

BEFORE THE DULY CONSTITUTED CHICAGO ELECTORAL BOARD

RONISHA DOBINE and)	
NINA STONER,)	
)	
Petitioners – Objectors,)	19-EB-MUN-012
v.)	No. _____
)	
NEAL SALES GRIFFIN,)	
)	
Respondent – Candidate.)	

OBJECTORS' PETITION

Objectors, RONISHA DOBINE and NINA STONER, referred to as "Objectors" file their Objectors' Petition challenging the legal and factual sufficiency and petition signers contained within the Nomination Papers submitted by NEAL SALES GRIFFIN, as follows.

1. Objector, RONISHA DOBINE, resides at 11946 S. Eggleston, Chicago, IL 60628, and is a duly qualified, legal and registered voter at this same address in Chicago, Illinois. Objector, NINA STONER, resides at 353 W. 120th St. Chicago, IL 60628, and is a duly qualified, legal and registered voter at this same address in Chicago, Illinois.

2. The Objectors' interest in filing this objection is that of citizens and voters desirous of seeing to it that the election laws of Illinois and the City of Chicago governing the filing of nomination papers for the office of Mayor of the City of Chicago are properly complied with, and that only duly qualified candidates appear on the ballot for this office at the municipal general election to be held on February 26, 2019.

3. The Objectors makes the following objections to purported nomination paper ("Nomination Papers") of NEAL SALES GRIFFIN as a candidate for the office of Mayor of the City of Chicago, County of Cook, State of Illinois ("Office") to be voted for at the City of Chicago municipal general election to be held on February 26, 2019 ("Election"). The Objectors

state that the Nomination Papers are insufficient in the fact and law for the reasons stated herein and on the attached Appendix-Recapitulation.

4. Pursuant to Illinois law, nomination papers for the office of Mayor of the City of Chicago must contain the signatures and addresses at least 12,500 duly qualified, registered and legal voters of the City of Chicago, Illinois collected in the manner prescribed by law. In addition, nomination papers must truthfully allege the qualifications of the candidate and be gathered and presented in the manner provided for in the Illinois Election Code.

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 addresses shown opposite their respective names, as is set forth specifically in the Appendix-Recapitulation sheets attached 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 petition sheets with the signatures and names of persons who did not personally sign the Nomination Papers in their own proper person, and that such signatures are not genuine signatures, but are forgeries, as is set forth specifically in the Appendix- Recapitulation attached 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 are not registered voters in Chicago, Illinois, as is set forth specifically in the Appendix-Recapitulation sheets attached and incorporated herein, under the heading, Column C. "Signer resides outside of District," where the term District refers to voting district of the City of Chicago, in violation of the Illinois Election Code.

8. The Nomination Papers contain petitions sheets with the names of persons who

have not properly written their voter address, or who have omitted their voter address, as is set forth specifically in the Appendix-Recapitulation attached 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 petitions sheets with the signatures, names and addresses of persons who have signed the same petition more than one time, as more fully set forth in the Appendix-Recapitulation attached 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.

10. The Nomination Papers contain petitions sheets with the signatures, names and addresses of persons who have signed the same petition in violation of the Election Code, or otherwise deviated from the requirements of the Election Code, as more fully set forth in the Appendix-Recapitulation attached and incorporated herein, under the heading Column F. "Other" in violation of the Illinois Election Code.

11. The Nomination Papers are insufficient because they contain fewer than 12,500 validly collected signatures of duly qualified and registered legal voters of the City of Chicago, Illinois, signed by such voters in their own proper person with proper addresses, as is set forth by the objections recorded in the Appendix-Recapitulation attached hereto and incorporated herein.

12. The attached Appendix Recapitulation is incorporated herein, and the objections made therein are a part of this Objectors' Petition, as if fully stated herein.

13. In addition, Objectors assert that there was a duplication of page numbers, all of which should be stricken as being in violation of the Election Code requirement that pages be sequentially numbered. Specifically, after sheet 1377, Candidate re-started numbering his sheets

with a second set of sheet numbers 1368, 1369, 1370, 1371, 1372, 1373, 1374, 1375, 1376, and 1377, each of which should be stricken, and no signatures counted from these sheets.

14. As such, the combined effect of the errors and deficiencies in Candidate's Nomination Papers renders them legally and factually insufficient, in their entirety, and Candidate has failed to comply with the requirements of the Election Code, and his name should not be printed upon the City of Chicago Municipal General Election to be held on February 26, 2019.

WHEREFORE, the Objectors request the following: (a) a hearing on the objections set forth herein; (b) an examination by the Chicago Board of Election Commissioners of the official records relating to voters in the City of Chicago; (c) a determination that the Nomination Papers are legally and factually insufficient; (d) a decision that the name NEAL SALES GRIFFIN shall not be printed upon the official ballot for the office of Mayor of the City of Chicago, to be voted upon at the Chicago Municipal General Election to be held on February 26, 2019.

Respectfully submitted by:

RONISHA DOBINE 11946 S. Eggleston, Chicago, IL 60628
NINA STONER 353 W. 120th St. Chicago, IL 60628

State of Illinois)
County of Cook) ss

VERIFICATION

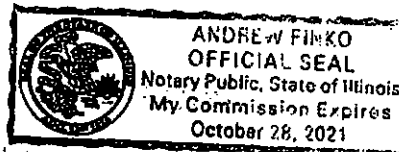
The undersigned, Objector, being duly sworn, under oath deposes and confirms on personal knowledge and belief, that the Candidate's nomination papers were reviewed and compared against the voter registration records kept by the Chicago Board of Election Commissioners, and the objections alleged in the Objectors' Petition are made in good faith based upon such review, and the factual statements in the Objectors' Petition are true and correct to the best of the undersigned's knowledge and belief, except as to matters therein stated to be on information and belief and as to such matters the undersigned believes the same to be true and correct.

Ronisha Dobine

Ronisha Dobine
11946 S. Eggleston
Chicago, IL 60628

Subscribed and sworn to before me
by the above-named signer on
November 28, 2018.

Andrew Finko
Notary Public



(seal)

State of Illinois)
County of Cook) ss

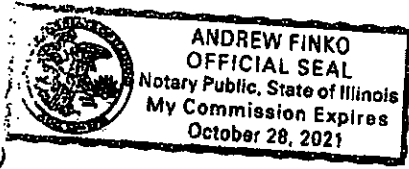
VERIFICATION

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Nina Stoner
Nina Stoner
353 W. 120th St.
Chicago, IL 60628

*Subscribed and sworn to before me
by the above-named signer on
November 28, 2018.*

Andrew Finko
Notary Public



(seal)