

BEFORE THE DULY CONSTITUTED ELECTORAL BOARD

IN THE MATTER OF THE OBJECTIONS OF:)	
)	
Jerry L. Jackson,)	
)	
Petitioner-Objector,)	19-EB-MUN-028
)	
v.)	CASE NO. _____
)	
Garry McCarthy,)	
)	
Respondent-Candidate.)	

2018 DEC -3 PM 4:56
 CHICAGO BOARD OF
 ELECTION COMMISSIONERS

OBJECTOR'S PETITION

NOW COMES, Jerry L. Jackson, (the "Objector"), and pursuant to §10-8 of the Illinois Election Code, 10 ILCS 5/1-1, et seq., states as follows:

Introduction

The Objector, Jerry L. Jackson, states that she resides at 9819 S. Maryland Avenue in the City of Chicago, Zip Code 60628, and that she is a duly qualified, registered, and legal voter of the City of Chicago, County of Cook, State of Illinois, the political subdivision in which Respondent-Candidate, Garry McCarthy (the "Candidate") is to be voted upon. Objector states that Objector's interest in filing the following objections is that of a citizen desirous of seeing that the election laws governing the filing of nomination papers for the office of Mayor of the City of Chicago in the County of Cook, State of Illinois, are properly complied with, and that only qualified candidates appear on the ballot for said office as a candidate at the February 26, 2019 Municipal General Election ("Election").

Therefore, the Objector makes the following objections, upon information and belief, to the Nomination Papers of Garry McCarthy as a candidate for the office of Mayor of the City of Chicago in the County of Cook, State of Illinois, to be voted upon at the February 26, 2019 Municipal General Election.

1. Nomination Papers must truthfully allege the qualifications of the candidate, must contain the statutorily required minimum amount of true and genuine signatures of duly qualified, registered, and legal voters in the political subdivision or district in which Candidate seeks nomination or election, must be gathered and presented in the manner provided for in the Illinois Election Code, and must be otherwise executed in the form provided by law.
2. The Candidate has filed Nomination Papers that purport to contain signatures of duly qualified, legal, and registered voters of the political subdivision or district in which the Candidate seeks elective office in excess of the statutory minimum and, further purport to

have been gathered, presented and executed in the manner provided by the Illinois Election Code.

3. 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 and found invalid, being in violation of the statutes, and/or established case law, in such cases made and provided. Statute and established case law hold these provisions to be mandatory and strictly construed; failing to comply with even one of them will result in the petitions' invalidation.
4. As set forth herein, the Nomination Papers are insufficient in law and fact for the following reasons:

Petition Signature Objections

5. The Objection and Appendix-Recapitulation Sheets attached hereto and incorporated herein as "Group Exhibit A" set out the following objections to the Candidate's nomination papers.
6. The Nomination Papers contain petition sheets with the names of persons who are not registered voters at the addresses shown opposite their respective names, as is set forth specifically in the Objection and Appendix-Recapitulation Sheet attached hereto and incorporated herein, under the heading, Column a., "Signer not registered at address shown", in violation of the Illinois Election Code.
7. The Nomination Papers contain the names of persons who did not sign said papers in their own proper persons, and said signatures are not genuine signatures of registered voters at the addresses shown opposite their names and are forgeries, as is set forth specifically in the Objection and Appendix-Recapitulation Sheet attached hereto and incorporated herein, under the heading, Column b., "Signature not genuine signature of registered voter", in violation of the Illinois Election Code.
8. The Nomination Papers contain petition sheets with the names of persons for whom addresses are stated that are not in the Political Subdivision or District that the Candidate is seeking elective office and such signatures are not valid, as is set forth specifically in the Objection and Appendix-Recapitulation Sheet attached hereto and incorporated herein, under the heading, Column c., "Signer resides outside district", in violation of the Illinois Election Code.
9. The Nomination Papers contain the names of persons for whom the signer's address is missing or incomplete as is set forth specifically in the Objection and Appendix-Recapitulation Sheet attached hereto and incorporated herein, under the heading, Column d., "Signer's address missing or incomplete", in violation of the Illinois Election Code.
10. The Nomination Papers contain the names of persons who have signed the Nomination Papers more than one time as is set forth specifically in the Objection and Appendix-

Recapitulation Sheet attached hereto 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.

11. The Nomination Papers contain the signatures of various individuals who had previously signed a nominating petition of another candidate for the same office, thereby precluding them from petitioning for the Candidate's attempt to access the ballot at the 2019 Municipal General Election in the City of Chicago, as more fully set forth in the Supplemental Appendix-Recapitulation, marked "**Group Exhibit B**," and attached hereto and made a part hereof, all of said signatures being in violation of the statutes in such cases made and provided.
12. The Objection and Appendix-Recapitulation sheets have designated "Sheet Numbers," which reference Candidate's petition sheet numbers. An "X" or "√" placed on a line of the Appendix-Recapitulation indicates that an objection is made to the corresponding signature line of the referenced petition sheet for the reasons stated above, as well as the other specific allegations made in this Objector's Petition. The Objections made on **Group Exhibit B** are also made as if made within this Objector's Petition as specified above.

Notary & Circulator Objections

13. In addition to the above-mentioned objections and those more fully set forth below, the Objection and Appendix-Recapitulation sets forth the following objections to Candidate's nomination papers related to purported circulators and notaries.
14. The Nomination Papers contain petition sheets which bear a circulator's affidavit which is not signed by the circulator, in violation of the Illinois Election Code, and every signature on such sheets is invalid, as is set forth in the Objection and Appendix-Recapitulation Sheet attached hereto and incorporated herein, under the heading "Circulator did not sign petition".
15. The Nomination Papers contain petition sheets which bear a circulator's affidavit which is not signed by the circulator in his/her own proper person, and such signatures are not genuine and are forgeries, and every signature on such sheets is invalid, as is set forth in the Objection and Appendix-Recapitulation Sheet attached hereto and incorporated herein, under the heading, "Circulator's signature not genuine".
16. The Nomination Papers contain Petition Sheets that bear a circulator's affidavit that is false because it is signed by a Circulator who does not reside at the address given, and every signature on such sheet is invalid, as is set forth in the Objection and Appendix-Recapitulation Sheet attached hereto and incorporated herein, under the heading "Circulator does not reside at address shown".
17. The Nomination Papers contain petition sheets that bear a circulator's affidavit on which the circulator's address is incomplete and not provided in accordance with the mandatory

provisions of the Election Code, and every signature on such sheets is invalid, as is set forth in the Objection and Appendix-Recapitulation Sheet attached hereto and incorporated herein, under the heading, "Circulator's address is incomplete or missing".

18. The Nomination Papers contain petition sheets which bear a circulator's affidavit on which the circulator did not personally appear before the Notary Public to subscribe or acknowledge his/her signature as circulator in the presence of said Notary Public, and every signature on such sheets is invalid, as is set forth in the Objection and Appendix-Recapitulation Sheet attached hereto and incorporated herein, under the heading, "Circulator did not appear before Notary".
19. The Nomination Papers contain petition sheets that bear a circulator's affidavit that does not contain the full, mandatory, requisite, sworn and certified statement from the circulator, in violation of the Illinois Election Code and every signature on such sheets is invalid, as is set forth in the Objection and Appendix-Recapitulation Sheet attached hereto and incorporated herein, under the heading, "Circulator affidavit incomplete."
20. The Nomination Papers contain Petition Sheets that were not circulated by the signatory circulator, but were in fact circulated by other parties, and as such, the Circulator's Affidavit is false, and in violation of the Illinois Election Code, and thus renders each and every signature on the aforesaid petition signature sheets invalid, as is more fully set forth in the Objection and Appendix-Recapitulation Sheet, attached hereto and incorporated herein, under the heading, "Purported circulator did not circulate sheet."
21. The Nomination Papers contain petition sheets which bear a circulator's affidavit with a notarial jurat bearing the name of a person who purportedly notarized said sheets, but for which in fact the circulator's affidavit was sworn to before another person who purported to be the Notary Public whose seal and signature appears on said sheet, and every signature on such sheets is invalid, as is set forth in the Objection and Appendix-Recapitulation Sheet attached hereto and incorporated herein, under the heading, "Purported Notary did not notarize sheet".
22. The Nomination Papers contain petition sheets which bear a circulator's affidavit which does not fully set forth the date, dates or range of dates on which the sheet was circulated, and which also does not state that no signatures were obtained more than 90 days before the last day for filing the petition, and every signature on such sheets is invalid, as is set forth in the Objection and Appendix-Recapitulation Sheet attached hereto and incorporated herein, under the heading, "Dates of circulation not given or incomplete".
23. The Nomination Papers contain petition sheets which bear a circulator's affidavit which is not properly sworn to before a Notary Public or other appropriate officer, in that the notarial jurat lacks proper form, and every signature on such sheets is invalid, as is set forth in the Objection and Appendix-Recapitulation Sheet attached hereto and incorporated herein, under the heading, "Circulator's affidavit not properly notarized".

24. The Nomination Papers contain petition sheets that bear a circulator's affidavit on which the circulator did not personally appear before the Notary Public to subscribe or acknowledge his/her signature as circulator in the presence of said Notary Public, and every signature on such sheets is invalid, as is set forth in the Objection and Appendix-Recapitulation Sheet attached hereto and incorporated herein, under the heading, "Circulator did not appear before Notary", in violation of the Illinois Election Code and the Notary Public Act.
25. The Nomination Papers contain petition sheets that bear a circulator's affidavit that is not sworn to before a Notary Public or other appropriate officer, and every signature on such sheets is invalid, as is set forth in the Objection and Appendix-Recapitulation Sheet attached hereto and incorporated herein, under the heading, "Sheet not notarized by Notary or appropriate officer".
26. The Nomination Papers contain petition sheets that bear a circulator's affidavit that is not properly sworn to before a Notary Public or other appropriate officer, in that the notarial jurat lacks the proper form as prescribed by Illinois law, and every signature on such sheets is invalid, as is set forth in the Objection and Appendix-Recapitulation Sheet attached hereto and incorporated herein, under the heading, "Notary incomplete."
27. The Nomination Papers contain petition sheets that do not contain a proper notarization in that the date is missing from the notarial jurat in violation of the Election Code and the Notary Public Act, and every signature on such sheets is invalid, as is set forth in the Objection and Appendix-Recapitulation Sheet attached hereto and incorporated herein, under the heading, "Date of notary missing."
28. The Nomination Papers contain petition sheets which bear a circulator's affidavit with a Circulator who either was not of legal age to circulate petition, or that bears a circulator's affidavit which is false signed by a circulator who is not a U.S. Citizen, and every signature on such sheets is invalid, as is set forth in the Objection and Appendix-Recapitulation Sheet attached hereto and incorporated herein under the heading "Circulator not qualified under the law".
29. The Nomination Papers contain petition signature sheets with other violations of the Illinois Election Code, as more fully set forth in the Objection and Appendix-Recapitulation, attached hereto and made a part hereof, under the heading, "Other," with the violation specified, all of said signatures being invalid, in violation of the Illinois Election Code.
30. The Nomination Papers contain petition sheets circulated and/or notarized by individuals whose petition sheets demonstrate a pattern of fraud and disregard of the Election Code to such a degree that every signature on every petition sheet purportedly circulated by said individuals are invalid, and should be invalidated, in order to protect the integrity of the electoral process. Specifically, but without limitation, the disregard of the Election Code is evidenced by certain purported circulators' submission of petition sheets that contain signatures that were not placed on the petition sheet or sheets by the voters in

their own proper person but were signed by other individual(s) and numerous signatures on said purported circulator's petition sheets appear to be not genuine, and such signatures appear to have been forged and written in the same hand and exhibit evidence of that one or a number of individuals simply printed voters' names or forged voters' signatures; that numerous petition sheets were submitted contain the names of purported petition signers whose name appears on many of the petition sheets purportedly circulated by the same circulator and on the petition sheets of other circulators and, on information and belief, the excessively high number of duplicate names were intentionally added as a means to undermine the electoral process in violation of the Illinois Election Code; that numerous petition sheets were submitted where the petition signers did not sign in the presence of the purported circulator and the purported circulator was not the true circulator of the petition sheet; and numerous petition sheets were notarized for alleged circulators who did not personally appear before the notary and swear or affirm their oath, all in flagrant violation and disregard of the Election Code.

Such circulators, and all signatures submitted by them, are those who circulated the sheets in which objections are made in "Column b" of the Objection and Appendix Recapitulation Sheets. In addition, and in conjunction with the "Objections to Circulator or Notary" made in the Objection and Appendix-Recapitulation Sheets, the following circulators, and all signatures submitted by them, and notaries public, and all sheet notarized by them, are hereby challenged for the reasons stated in this paragraph:

- 1) Adrienne Housing
- 2) Alfreda Lias
- 3) Aljimon McKinney
- 4) Anthony Aguirre
- 5) Anthony Shanks
- 6) Antonio DeBruce
- 7) Arnetta Featherstone
- 8) Arzell Myles
- 9) Candice Hunt
- 10) Carl Hill
- 11) Carl Tucker
- 12) Dana Edwards
- 13) Daniel Cox
- 14) David Moore
- 15) Dirk Acklin
- 16) Earnestine Humphries
- 17) Eddie Dorsey
- 18) Edronell Ware
- 19) Evelyn Walker
- 20) Floyd Hatchen/Hatcher
- 21) Freddron Mendoza
- 22) Gregory Dixon
- 23) Ivin Powell

- 24) James Laura
- 25) Jeron Lee
- 26) Jimmy Collins
- 27) John Keeler
- 28) Kelton Webb
- 29) Mattie Crawford
- 30) Mickey Rudolph
- 31) Natalie Saraceno
- 32) Samantha Nash
- 33) Samuel Ewing
- 34) Selby Oliver
- 35) Selina Patton
- 36) Sonja Jackson
- 37) Sylvester Sherrill
- 38) Tammie Vinson
- 39) Tanisha Scott
- 40) Timothy Lee
- 41) Tony Walls

The petition sheets purportedly circulated or notarized by the above Circulators reveal a pervasive and systematic attempt to undermine the integrity of the electoral process, wherein the Circulators did not witness the purported signers subscribe their names; said purported signers not signing their names in the presence of the purported Circulator invalidates all signatures on each and every sheet of each Circulator listed above. Consequently, this Electoral Board should void the entire nomination papers as being illegal and void in its entirety.

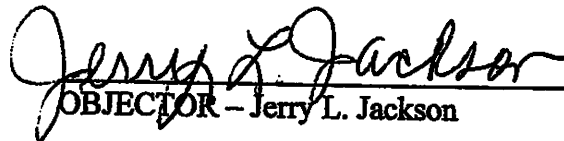
31. An "X" or "√" placed on a line at the bottom of the Objection and Appendix-Recapitulation Sheet indicates that an objection is made to all signatures on the referenced petition sheet for the reason specified next to the "X" and the corresponding reasons stated above.

Objections to Nomination Papers & Candidacy

32. Candidate filed Nomination Papers that are not sequentially numbered, in violation of the Illinois Election Code. Specifically, the petition signature sheets skip from number 99 to sheet number 200, which should render all sheets after sheet number 99 void. Additionally, and in the alternative, on numerous occasions, certain petition signature sheets are un-numbered, in violation of the Illinois Election Code and, as such, said sheets should be voided and all purported signatures thereupon are invalid. Finally, numerous petition signature sheets use the same petition sheet number and are not in sequential order. As such, said petition sheets were submitted in violation of the Illinois Election Code and are invalid and all purported signatures submitted on said petition sheets are null and void.

WHEREFORE, Objector prays that the nomination papers of Garry McCarthy as a candidate 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 General Municipal Election be declared to be insufficient and not in compliance with the laws of the State of Illinois, and that the Candidate's name be stricken and **NOT** appear on the February 26, 2019 Municipal General Election ballot, and that this Honorable Electoral Board enter its decision declaring that the name of Garry McCarthy as a candidate for the office of Mayor of the City of Chicago, County of Cook, State of Illinois, be **NOT** printed upon the official ballot for the Municipal General Election to be held on February 26, 2019.

Respectfully Submitted,


OBJECTOR - Jerry L. Jackson

Address: 9819 S. Maryland Avenue
Chicago, IL 60628

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 v.)
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 Garry McCarthy,)
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 Respondent-Candidate.)

OBJECTOR'S PETITION

GROUP EXHIBIT A

OBJECTION & APPENDIX-RECAPITULATION