

BEFORE THE DULY CONSTITUTED ELECTORAL BOARD FOR THE HEARING AND  
PASSING UPON OBJECTIONS TO NOMINATION PAPERS FOR CANDIDATES AT THE  
MARCH 20, 2018 GENERAL PRIMARY ELECTION

IN THE MATTER OF THE OBJECTIONS )  
OF RICKEY HENDON AND CHERITA LOGAN )  
TO THE NOMINATION PAPERS OF )  
**AHMED SALIM**, AS A CANDIDATE FOR )  
NOMINATION OF THE DEMOCRATIC PARTY )  
TO THE OFFICE OF REPRESENTATIVE IN )  
CONGRESS FOR THE 7TH CONGRESSIONAL )  
DISTRICT IN ILLINOIS TO BE VOTED )  
ON AT THE MARCH 20, 2018, PRIMARY ELECTION. )

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STATE BD OF ELECTIONS  
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**18-EB-CON-05**

OBJECTOR'S PETITION

NOW COME Rickey Hendon and Cherita Logan, hereinafter referred to as the "Objector," file their objections to the nomination papers of AHMED SALIM ("Candidate"), and challenge the legal and factual sufficiency of Candidate's nomination papers, and request that the name of Ahmed Salim not be printed upon the Democratic Party primary ballot at the March 20, 2018 general primary, and further state as follows.

1. Objector, Rickey Hendon, resides at 2800 W. Washington St., in Chicago, Cook County, Illinois 60612, and is a duly registered and qualified voter at that address.

2. Objector, Cherita Logan, resides at 154 N. Mason Ave., in Chicago, Cook County, Illinois 60644, and is a duly registered and qualified voter at that address.

3. The Objectors' interest in filing this objection is that of citizens and voters desirous of seeing to it that the election laws of Illinois governing the filing of nomination papers for the office of U.S. Representative for the 7<sup>th</sup> Congressional District of Illinois are properly complied with, and that only duly qualified candidates appear on the ballot for this office at the Democratic Party general primary election to be held on March 20, 2018.

4. Therefore your Objector makes the following objections to the nomination papers of Candidate and incorporates all Appendix-Recapitulation Sheets attached hereto as if fully stated herein, and states that the said nomination papers are insufficient in law and in fact for the following reasons.

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STATE BOARD OF ELECTIONS  
CLERK

5. Under the Illinois Election Code, the signatures of not less than 1,356 duly qualified, registered, and legal voters of the said 7<sup>th</sup> Congressional District of Illinois are required to be submitted. 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.

6. Objector states that the Candidate has filed petition signature sheets containing fewer than 1,356 signatures of allegedly duly qualified, legal, and registered voters of the 7<sup>th</sup> Congressional District of Illinois.

7. Objector further states that Candidate's Nomination Papers contain petition sheets with the names of persons who are not registered voters at the address written upon Candidate's petition sheets opposite their respective names, as set forth on the corresponding 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.

8. Objector further states that Candidate's 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 set forth on the corresponding Appendix-Recapitulation sheets attached and incorporated herein, under the heading, Column B "**Signer Signature Not Genuine,**" in violation of the Illinois Election Code.

9. Objector further states that Candidate's Nomination Papers contain petition sheets with the signatures and names of persons who reside outside of the boundaries of the 7<sup>th</sup> Congressional District in Illinois, and not duly registered and qualified voters within the 7<sup>th</sup> Congressional District of Illinois, as set forth on the corresponding Appendix-Recapitulation sheets attached and incorporated herein, under the heading, Column C "**Signer Resides Outside District,**" in violation of the Illinois Election Code.

10. Objector further states that Candidate's Nomination Papers contain petition sheets with the signatures and names of persons who did not properly and completely write their address on Candidate's Nomination Papers, and the address written upon Candidate's petition sheets opposite their respective names is missing or incomplete, as set forth on the corresponding Appendix-Recapitulation sheets attached and incorporated herein, under the heading, Column D **"Signer Address Missing or Incomplete,"** in violation of the Illinois Election Code.

11. Objector further states that Candidate's Nomination Papers contain petition sheets with the names of various individuals who have signed the petition more than once, and such duplicate signatures are invalid, as set forth on the corresponding Appendix-Recapitulation sheets attached and incorporated herein, under the heading, Column E **"Signer Signed Petition More Than Once at Sheet/Line Indicated,"** with a further notation therein of the sheet and line numbers of the alleged duplicate signature(s) in violation of the Illinois Election Code.

12. Objector further states that Candidate's Nomination Papers contain petition sheets with various purported signatures which are legally defective and deficient for a variety of reasons, (together with an appropriate further reason) attached hereto and made a part hereof, all of said signatures being in violation of the statutes in such cases made and provided. These objections include, but are not limited to improper, partial, incomplete, or no address; names stricken or crossed out from the sheets; use of only a partial name; and improper use of name; or individual signature lines being left unfilled or blank or containing a name that has been crossed off, eradicated, stricken, or removed, and are further set forth on the corresponding Appendix-Recapitulation sheets attached and incorporated herein, under the heading, Column F **"Other,"** all of said signatures being in violation of the statutes in such cases made and provided.

13. Objector further states that Candidate's Nomination Papers contain petition sheets with various purported circulator signatures which are legally defective and deficient for a variety of reasons, as set forth on the corresponding Appendix-Recapitulation sheets attached and incorporated herein, at the lower portion, with a mark next to a description being an objection as

to the circulator and/or notary of the designated sheet number shown at the top of each Appendix-Recapitulation sheet, as if fully set forth herein, including but not limited to:

- Circulator is under 18 years of age
- Circulator did not sign petition sheet
- Circulator does not reside at address shown
- Circulator is not US Citizen
- Circulator's signature not genuine (pattern of fraud)
- Circulator's address is incomplete
- Circulator circulated for a candidate of another party
- Circulator's affidavit not properly notarized
- Purported circulator did not circulate sheet
- Circulator did not appear before notary
- Sheet not notarized
- Dates of circulation not given
- Dates of circulation incomplete
- Purported notary did not notarize sheet
- [Other]

14. Objector further states that the said nominating petition contains petition signature sheets listed in the Appendix-Recapitulation sheets which are attached and incorporated herein in which the circulator of those particular sheets certifies under oath that each circulator resided at the designated address written on each petition sheet, when, in fact, said circulator did not reside at the address written in the circulator's oath but actually resided at and/or was registered to vote from a different address, making those particular Circulator Affidavits false and perjurious (*see* 10 ILCS 5/7-10; *Buckley v. American Constitutional Law Foundation, Inc.*, 525 U.S. 182, 119 S.Ct. 636, 644 (1999) ("address at which he resides, including the street name and number, the city or town [and] the county" preserves subpoena power); *Tobin for Governor v. Illinois State Board of Elections*, 105 F.Supp.2d 882, 887, (N.D.Ill. 2000) (circulators "must state their addresses on the affidavit"); *Krislov v. Rednour*, No. 96 C 674, 1999 WL 1794035, \*2 (N.D.Ill. July 7, 1999) (state "can police circulators by the fact that they list their addresses on the affidavits")), and rendering each and every one of the signatures on such petition signature sheets so designated in the Appendix-Recapitulation, invalid, as more fully set forth in the Appendix-Recapitulation under the line items listed on lower portion, attached hereto and made a part hereof, all of said signatures being in violation in the statutes in such cases made and provided.

15. Objector further states that the said nominating petition contains petition signature sheets listed in the Appendix-Recapitulation sheets which are attached and incorporated herein in which the notarial *jurat* upon each listed petition sheet is defective and void in its entirety and all signatures thereon are invalid because the sheet has not been properly signed and/or sealed by the Notary Public, the absence of such signature being a fatal defect, as more fully set forth in the Appendix-Recapitulation, as more fully set forth in the Appendix-Recapitulation under the line items listed on lower portion, attached hereto and made a part hereof, all of said signatures being in violation in the statutes in such cases made and provided.

16. Objector further states that the said nominating petition contains petition signature sheets listed in the Appendix-Recapitulation sheets which are attached and incorporated herein in which the circulator has failed to sign in person, before a notary public, the Circulator Affidavit and take the oath, as required by law, on the line indicated for the "signature of person making this affidavit," rendering each and every signature on the aforesaid sheet invalid, as more fully set forth in the Appendix-Recapitulation under the line items listed on lower portion, attached hereto and made a part hereof, all of said signatures being in violation in the statutes in such cases made and provided.

17. Objector also states that petition signature sheets contain forged and false signatures, including the signature(s) of deceased persons, and are legally void in their entirety and indicate a pattern of fraud by the Candidate, and all of Candidate's sheets should be stricken and not counted.

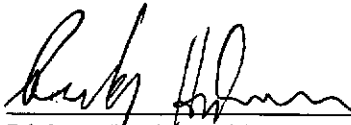
18. Your Objector states that there will be presented substantial, clear, unmistakable, and compelling evidence that establishes a "pattern of fraud and false swearing" with and "utter and contemptuous disregard for the mandatory provisions of the Election Code." In addition, an examination of the nominating petition as well as the results of the records examination hereunder will reveal a pervasive and systematic attempt to undermine the integrity of the electoral process. Consequently, your Objector states that this Electoral Board "cannot close its

eyes and ears” but will be compelled to void the entire nominating petition as being illegal and void in its entirety under the principles set forth in *Cunningham v. Schaefflein*, 2012 IL App (1st) 120529, ¶¶32 – 42, 969 N.E.2d 861; *Harmon v. Town of Cicero Municipal Officers Electoral Board*, 371 Ill.App.3d 1111, 864 N.E.2d 996 (1st Dist. 2007); *Canter v. Cook County Officers Electoral Board*, 170 Ill.App.3d 364, 523 N.E.2d 1299, 1300 – 1301 (1st Dist. 1988); *Huskey v. Municipal Officers Electoral Board for Village of Oak Lawn*, 156 Ill.App.3d 201, 509 N.E.2d 555, 556 – 558 (1st Dist. 1987); and *Fortas v. Dixon*, 122 Ill.App.3d 697, 462 N.E.2d 615, 617 (1st Dist. 1984). This allegation is made with specific reference to petition signature sheets identified on the Appendix-Recapitulation sheets, attached and incorporated herein, and, with investigation continuing. Your Objector will produce documentary and testimonial evidence that will establish *inter alia* that:

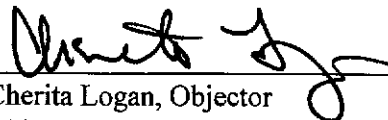
- (a) The purported circulator of the petition signature sheets listed in the Appendix-Recapitulation was not, in fact, the actual circulator.
- (b) Several signatures listed in the Appendix-Recapitulation were not placed on the petitions by the named voters in their own proper persons but were signed by other individuals, including a forged signatures.
- (c) The Candidate signed the Circulator Affidavit on several of these sheets listed in the Appendix-Recapitulation when, in fact, Candidate was not the true circulator.
- (d) Several signatures that appear on these sheets listed in the Appendix-Recapitulation were written by the same hand and are not genuine and are forgeries.
- (e) The circulators of various petition signature sheets listed in the Appendix-Recapitulation who were required to provide their true places of residence did not write their true place of residence, and do not in fact reside at the addresses contained in their Circulator Oaths, rendering such oaths false and perjurious.
- (f) The circulators of sheets listed in the Appendix-Recapitulation never actually appeared before the Notary Public to take the Circulator Oath, but instead presented these sheets to other persons who procured notarization after the fact and out of the presence of the circulators.
- (g) An excessively high percentage of signatures procured by circulator(s) listed in the Appendix-Recapitulation are not genuine, and demonstrate a willful and intentional disregard for the laws of Illinois and confirm a pattern of fraud.

17. Objector states that the nomination papers herein contested consist of various sheets supposedly containing the valid and legal signatures of individuals. The individual objections cited herein with specificity reduce the number of valid signatures below statutory minimum. In addition, the allegations contained in the foregoing paragraphs of this Objector's Petition render the entire nominating petition null and void.

WHEREFORE, your Objector respectfully requests the following: (a) that a hearing be held upon the objections set forth herein; (b) that an examination be undertaken of the official voter records be undertaken to determine the sufficiency of Candidate's purported signatures upon his nomination petitions; (c) that a determination be made that the Nomination Papers are legally and factually insufficient; (d) that this Electoral Board make a finding that the name of Ahmed Salim not be printed upon the official Democratic Party primary election ballot used at the March 20, 2018 general primary election, and (e) that this Electoral Board issue its decision declaring that the name of Ahmed Salim as a candidate of the Democratic Party NOT BE PRINTED on the OFFICIAL BALLOT for the Democratic Party at the Primary Election to be held on March 20, 2018.



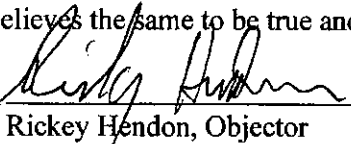
Rickey Hendon, Objector  
2800 W. Washington St.  
Chicago, IL 60612



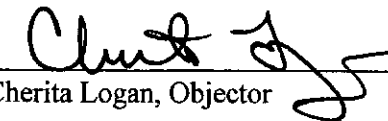
Cherita Logan, Objector  
154 North Mason Ave.  
Chicago, IL 60644

#### VERIFICATION

The undersigned as Objector, under penalties as provided in Section 1-109 of the Code of Civil Procedure affirm or verify that he/she has read this OBJECTOR'S PETITION and that the factual statements therein are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true and correct.



Rickey Hendon, Objector



Cherita Logan, Objector