

LAUREN STALEY FERRY

WILL COUNTY CLERK



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IN THE MATTER OF:

OBJECTORS PETITION OF GRETA MITCHELL WILLIAMS OBJECTION TO THE NOMINATION PAPERS OF RAQUEL MITCHELL, CANDIDATE FOR THE NOMINATION OF THE REPUBLICAN PARTY TO THE OFFICE OF WILL COUNTY BOARD DISTRICT 3.

CALL OF WILL COUNTY OFFICERS ELECTORAL BOARD

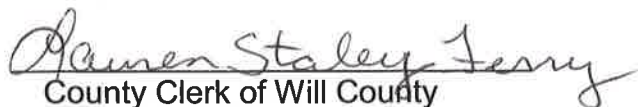
This call is hereby directed to Honorable Lauren Staley Ferry, County Clerk of Will County, Illinois; Honorable James Glasgow, State's Attorney of Will County, Illinois; Honorable Andrea Lynn Chasteen, Circuit Clerk of Will County, Illinois Greta Mitchell Williams, individual who filed the Objector's Petition herein; and Raquel Mitchell, the candidate whose petitions are objected to:

Please be advised that the Will County Officers Electoral Board is required to meet and hear and pass upon the aforesaid Objection to Raquel Mitchell as a candidate for the nomination of the Republican Party to the office of Will County Board District 3, which said hearing is set for Thursday, June 11, at 9:30 a.m. at the Will County Courthouse, 14 W. Jefferson St., Joliet in Courtroom 121 at which time the said County Officers Electoral Board will consider:

1. The question of whether or not said Electoral Board has jurisdiction under Illinois law to hear said Objector's Petition.
2. The question as to whether or not the Nomination papers of Raquel Mitchell as a candidate for the nomination of the Republican Party to the office of Will County Board District 3 are in proper form and whether or not the petition on file is valid and whether the objections thereto should be sustained.

at which said place and time you and any other interested person shall be present.

Will County Officers Electoral Board

By: 
County Clerk of Will County

DATED: 6/9/2020

BEFORE THE DULY CONSTITUTED BOARD FOR THE HEARING AND PASSING UPON OF OBJECTIONS TO THE NOMINATING PETITIONS FOR THE OFFICE OF WILL COUNTY BOARD MEMBER DISTRICT 03

GRETA MITCHELL WILLIAMS)
Plaintiff,)
)
Vs.)
RAQUEL MITCHELL,)
Respondent,)

Case No.

WILL COUNTY CLERK
WILL COUNTY, ILLINOIS
2020 JUN -8 PM 4:27

FILED

VERIFIED OBJECTORS PETITION

Now comes GRETA MITCHELL WILLIAMS hereinafter referred to as the ("Objector") and states as follows:

1. GRETA MITCHELL WILLIAMS resides at 734 Bethel Avenue, Bolingbrook, IL 60490, in the County of Will and State of Illinois, is duly qualified, registered and a legal voter at such address; and his 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 the office of County Board Member District 03, County of Will, State of Illinois are properly complied with, and that only qualified candidates who have followed the law appear upon the ballot for said office and that candidates and parties are not allowed to circumvent the law.
2. The Objector states that 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.
3. The Objector makes the following objections to the purported nomination papers of RAQUEL MITCHELL, (hereinafter referred to "RAQUEL") as a candidates for the office of County Board Member District 03, County of Will, State of Illinois (hereinafter referred to as "CB 03") to be voted for at the General Election to be held on November 03, 2020, and states that the Nomination Papers are insufficient in law and in fact for the following reasons:

A. Candidate Mitchell cites the wrong nominating committee in her signature pages

1. No candidate appeared on the March 17, 2020 primary ballot for the either of the Will County Board District 3 positions.
2. Vacancies in nomination when no candidate appeared on the party's primary ballot are governed by paragraph 910 ILCS 5/7-61. *Wisnasky-Bettore vs. Pierce, 965 N.E.2d 1103.*
3. 5/7-61 further requires that when no candidate has appeared on the party's primary ballot, if the party does nominate someone to fill that ballot spot that person must be nominated by the appropriate committee.
4. Here the appropriate committee to nominate a person to fill either of the Republican vacancies in nomination for County Board District 3 is the Will County District 03 Committee of the Republican Party. 10 ILCS 5/7-8.

5. The Will County Republican Central Committee is not the appropriate Committee to nominate a candidate to fill a Republican vacancy on the general election ballot for Will County Board District 03.

6. The headings on Candidate Mitchell's Nominating Petitions state that she was nominated by the Will County Republican Central Committee.

7. The Circulator's Affidavit of Candidate Mitchell's Nominating Petitions states that Candidate Mitchell was nominated by the Will County Republican Central Committee.

8. On Sheet 9 of her Nominating Petitions Candidate Mitchell swears that she was selected as the Nominee by the Will County Republican Central Committee.

WHEREFORE, based upon the foregoing the Objector prays this Honorable Hearing Board for the following relief:

- A. That Candidate Mitchell's Nominating Petitions be stricken as legally insufficient and that her name be removed from the November 03, 2020 General Election Ballot.
- B. Raquel Mitchell's Nomination Papers for County Board District 03, be declared insufficient and not in compliance with the laws of the State of Illinois, that said Nominations Papers be invalidated, and that Raquel Mitchell's name not appear on the November 03, 2020 General Election ballot.
- C. That Objector Williams objection be sustained and that Candidate Mitchell's Nominating Petitions be declared invalid.
- D. Any other relief this Hearing Board deems equitable and just.

B. The required notice for the required meeting of the appropriate nominating committee was not sent

9. The Objector re-alleges the allegations made in subparagraphs 1 through 8 of paragraph A above.

10. 10 ILCS 5/7-9 requires that notice of any special committee meeting be in writing and be given with at least five-day notice.

11. Based upon Candidate Mitchell's sworn statement on Sheet 9 of her Nominating Petitions Objector believes that the required notice for the meeting to nominate a Republican to the Republican County Board District 03 vacancy was sent to the Will County Republican Central Committee.

12. That the Will County Republican Central Committee is not the appropriate committee to nominate a person to fill the Republican County Board District 3 vacancy.

WHEREFORE, based upon the foregoing the Objector prays this Honorable Hearing Board for the following relief:

- A. That Candidate Mitchell's Nominating Petitions be stricken as legally insufficient and that her name be removed from the November 03, 2020 General Election Ballot.

- B. Raquel Mitchell's Nomination Papers for County Board District 03, be declared insufficient and not in compliance with the laws of the State of Illinois, that said Nominations Papers be invalidated, and that Raquel Mitchell's name not appear on the November 03, 2020 General Election ballot.
- C. That Objector Williams objection be sustained and that Candidate Mitchell's Nominating Petitions be declared invalid.
- D. Any other relief this Hearing Board deems equitable and just.

C. That there are inconsistencies within Candidate Mitchell's Notice of Appointment and Resolution to Fill A Vacancy

13. The Objector re-alleges the allegations made in subparagraphs 1 through 8 of paragraph A above.

14. Candidate Mitchell's Notice of Appointment and Resolution to Fill A Vacancy in Nomination states, in paragraph two (2), that the Republican Party did not nominate a second candidate in the two candidate District 03, and that Candidate Mitchell was nominated to fill the one vacancy in the Office of Will County Board Member in District 3.

15. That no candidate appeared on the March 17, 2020 Republican Party primary ballot.

16. That paragraph four (4) of the Notice of Appointment and Resolution states that there was only one vacancy for a Republican on the General Election ballot.

17. That there are in fact two vacancies for a Republican on the General Election ballot.

18. That paragraphs two (2) and four (4) of Candidate Mitchell's Notice of Appointment and Resolution to Fill A Vacancy in Nomination conflict with each other.

19. That the conflict between paragraph two (2) and four (4) of the Notice of Appointment and Resolution to fill a Vacancy in Nomination make the Notice of Appointment unclear and confusing.

WHEREFORE, based upon the foregoing the Objector prays this Honorable Hearing Board for the following relief:

- A. That the Notice for Appointment and Resolution to Fill A Vacancy in Nomination be stricken, and that Candidate Mitchell's name be removed from the November 03, 2020 General Election Ballot
- B. Raquel Mitchell's Nomination Papers for County Board District 03, be declared insufficient and not in compliance with the laws of the State of Illinois, that said Nominations Papers be invalidated, and that Raquel Mitchell's name not appear on the November 03, 2020 General Election ballot.
- C. That Objector Williams objection be sustained and that Candidate Mitchell's Nominating Petitions be declared invalid.
- D. Any other relief this Hearing Board deems equitable and just.

D. That there are inconsistencies between Candidate Mitchell's Notice of Appointment and Resolution to Fill A Vacancy in Nomination and her Nominating Papers

20. The Objector re-alleges the allegations made in paragraphs 1 through 19 above
21. That Candidate Mitchell's Notice of Appointment and Resolution to Fill a Vacancy in nomination states that she was nominated by the Will County Board District 03 Committee of the Republican Party.
22. That Candidate Mitchell's Nominating Papers state that she was nominated by the Will County Republican Central Committee.
23. That the Notice of Appointment and Nominating Papers are inconsistent as to which committee nominated Candidate Mitchell.
24. That the inconsistencies between the Notice of Appointment and Nominating Papers confuse the voters and are fatal to Candidate's nomination.

WHEREFORE, based upon the foregoing the Objector prays this Honorable Hearing Board for the following relief:

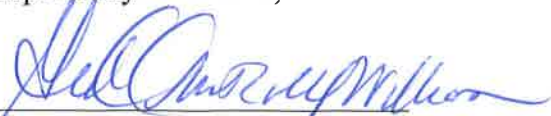
- A. That the Notice for Appointment and Resolution to Fill A Vacancy in Nomination be stricken, and that Candidate Mitchell's name be removed from the November 03, 2020 General Election Ballot
- B. Raquel Mitchell's Nomination Papers for County Board District 03, be declared insufficient and not in compliance with the laws of the State of Illinois, that said Nominations Papers be invalidated, and that Raquel Mitchell's name not appear on the November 03, 2020 General Election ballot.
- C. That Objector Williams objection be sustained and that Candidate Mitchell's Nominating Petitions be declared invalid.
- D. Any other relief this Hearing Board deems equitable and just.

The Objector in this matter will be represented by:

Joel P. Brown
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Fx: 779-227-6135
joel@reederbrownlaw.com

All communications for the Objector, GRETA MITCHELL WILLIAMS, should be directed to her attorney's attention.

Respectfully submitted,



GRETA MITCHELL WILLIAMS

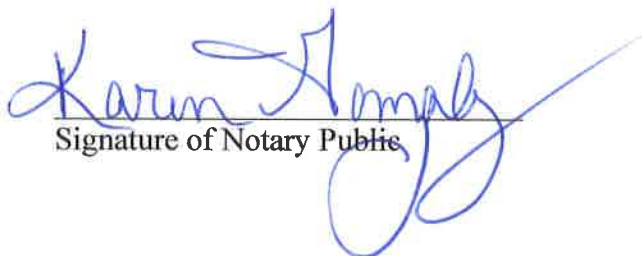
VERIFICATION

The undersigned as Objector, first being duly sworn on oath, now deposes and says that she has read this **VERIFIED OBJECTORS PETITION** and that the 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 she verily believes the same to be true and correct.


GRETA MITCHELL WILLIAMS

County of Will)
) ss.
State of Illinois)

Subscribed to and sworn to me by GRETA MITCHELL WILLIAMS on this 08th day of November, 2020.


Signature of Notary Public

