

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

JOEL BROWN)
Plaintiff,)
)
Vs.)
)
RAQUELL MITCHELL,)
Respondent,)

Case No.

2019 DEC -9 PM 4:21
WILL COUNTY CLERK
WILL COUNTY, ILLINOIS

FILED

Now comes JOEL BROWN hereinafter referred to as the ("Objector"), and states as follows:

1. JOEL BROWN resides at 1254 Pullman Road, Apt. 305, Village of Romeoville, 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 Primary Election to be held on March 17, 2020, and states that the Nomination Papers are insufficient in law and in fact for the following reasons:

A. Candidate Mitchell does not have the requisite number of signatures from qualified primary electors to appear on the Republican Primary Ballot

Candidates who wish to appear on the Republican Primary Ballot for County Board District 3 must submit thirty-seven (37) signatures of qualified primary voters who live in the District in order to qualify to appear on the ballot. Said signatures must include the voters address in order to be valid. Candidate Mitchell submitted exactly fifty-seven (57) signatures in her Nomination Papers, however, not all the signatures that she submitted are valid. When the invalid signatures are subtracted, Candidate Mitchell submitted only thirty-three (33) valid signatures. The following are not signatures from qualified primary electors who live in County Board District 03:

- 1. Page 4, Line 1 – Signer’s address is outside of County Board District 3
- 2. Page 4, Line 2 – Signer’s address is outside of County Board District 3
- 3. Page 4, Line 3 – Signer’s address is outside of County Board District 3

4. Page 4, Line 4 – Signer’s address is outside of County Board District 3
5. Page 4, Line 5 – Signer’s address is outside of County Board District 3
6. Page 4, Line 6 – Signer’s address is outside of County Board District 3
7. Page 4, Line 7 – Signer’s address is outside of County Board District 3
8. Page 4, Line 8 – Signer’s address is outside of County Board District 3
9. Page 4, Line 9 – Signer’s address is outside of County Board District 3
10. Page 4, Line 10 – Signer’s address is outside of County Board District 3
11. Page 5, Line 1 – Signer’s address is outside of County Board District 3
12. Page 5, Line 2 – Signer’s address is outside of County Board District 3
13. Page 5, Line 4 - Signer’s address is outside of County Board District 3
14. Page 5, Line 5 - Signer’s address is outside of County Board District 3
15. Page 5, Line 9 - Signer does not provide an address
16. Page 6, Line 6 – Signer does not provide an address
17. Page 6, Line 7 – No Signer associated with address
18. Page 6, Line 8 – Singer’s address is outside of County Board District 3
19. Page 6, Line 9 – Signer’s address is outside of County Board District 3
20. Page 7, Line 2 – Signer does not provide an address
21. Page 7, Line 9 – Signer’s address is outside of County Board District 3
22. Page 7, Line 10 – Signer’s address is outside of County Board District 3
23. Page 8, Line 1 – Signer’s address is outside of County Board District 3
24. Page 8, Line 2 – Signer not registered to vote at address

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


- A. The signatures that Candidate Mitchell submitted from persons who live outside of County Board District 3 be stricken.
- 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 2020 Republican Primary ballot.
- C. 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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joel@reederbrownlaw.com

All communications for the Objector, Joel Brown, should be directed to his attorney’s attention.


Respectfully submitted,



Joel Brown

VERIFICATION

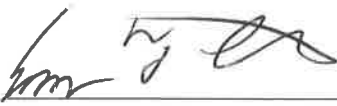
The undersigned as Objector, first being duly sworn on oath, now deposes and says that she has read this **VERIFIED OBJECTORS PETITION** and that the statements therein are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that she verily believes the same to be true and correct.



Joel Brown

County of Will)
) ss.
State of Illinois)

Subscribed to and sworn to me by Joel Brown on this 09th day of December, 2019.



Signature of Notary Public

