

**BEFORE THE DULY CONSTITUTED ELECTORAL BOARD FOR THE HEARING
AND PASSING UPON OBJECTIONS TO THE NOMINATION PAPERS FOR
CANDIDATES FOR THE OFFICE OF UNITED STATES PRESIDENT**

BRANT DAVIS,)	
)	
Objector,)	
)	
vs.)	Case No.
)	
HILLARY RODHAM CLINTON,)	
)	
Candidate.)	

VERIFIED OBJECTOR’S PETITION

NOW COMES the Objector, **BRANT DAVIS** (“Objector”), and states that Objector resides at 1635 West Beach, Unit 2, in the City of Chicago, Cook County, Illinois 60622, and that he is a registered, qualified, legal voter of the State of Illinois, and his interest in filing this objection is that of citizen desirous of seeing that the Laws of the State of Illinois governing the filing of such petitions for nomination are fully and properly complied with and that only those petitions which do properly comply therewith have their names printed upon the ballot to be voted upon at the General Primary Election to be held March 15, 2016 (the “Election”). In support thereof, Objector makes the following objections:

1. Candidate Hillary Rodham Clinton’s (“Candidate”) Petition for Nomination (“Petition”) must include at least 3,000 valid signatures of legal voters in order for her name to appear on the ballot for the Election.
2. The Petition contains sheets and signatures which do not comply with the requirements of the law and, as a result, those sheets and signatures must not be counted towards the minimum signature requirement for Candidate.

3. The Petition contains certain sheets which are invalid in their entirety because the Circulator's Affidavit was not properly "sworn to before some officer authorized to administer oaths in this State." Specifically, the Circulator's Affidavits on these sheets fail to identify the county in which the affidavit was executed and/or notarized. The specific sheets which are invalid under this paragraph are as follows: 169, 207, 209, 212, 217, 289, 310, 333, 343, 344, 346, 363, 399, 408, 418, 473, 476, 490, and 492.

4. Page 212 of the Petition is invalid because the Circulator did not identify the Circulator's "street address or rural route number, as the case may be, as well as the county, city, village or town, and state."

5. Pages 216, 357, and 489 of the Petition are invalid and fail to satisfy the requirements of the Election Code because the address specified for the Circulator on each page does not appear to correspond to a residence.

6. Pages 6, 40, 53, 117, 247, 291, 340 and 440 of the Petition are invalid because the Circulator's name, signature, and street address are illegible, making it unreasonably difficult or impossible to identify and locate the Circulator from the face of the document.

7. The Petition contains petition sheets which are invalid because they were not properly "sworn to before some officer authorized to administer oaths in this State." The oaths and/or notarizations on these pages are legally insufficient and invalid because each fails to specify the complete date on which the document was notarized. The petition sheets which are invalid under this paragraph are as follows: 124, 349, 350, 375, and 385.

8. The Petition contains petition sheets which are invalid because they were not properly "sworn to before some officer authorized to administer oaths in this State." The oaths and/or notarizations on these pages are legally insufficient and invalid because the notary failed

to affix an official stamp or seal and because the notary's signature is illegible. The Petition sheets which must be invalidated under this paragraph are as follows: 42, 52, 62, 72, 83, 134, 144.

9. The Petition contains individual signatures which must be invalidated because they contain illegible addresses and other defects which render them invalid. These signatures along with their individual sheet and line numbers are contained in the attached Appendix under the heading "The following 206 page numbers and line numbers, denoted as (page#)/(line#), have an illegible address, along with other defects, that render them incapable of verifying the alleged registrants."

10. The Petition contains individual signatures which must be invalidated because they fail to contain complete addresses for signers which render those signatures invalid. These signatures along with their individual sheet and line numbers are contained in the attached Appendix under the heading "The following 221 page numbers and line numbers, denoted as (page#)/(line#) have insufficient information in the printed address, along with other defects, that do not match a particular alleged registrant."

11. The Petition contains signature lines which were left blank. These lines are contained in the attached Appendix under the heading "The following 41 page numbers and line numbers, denoted as (page#)/(line#) were left blank."

12. The Petition contains individual signatures which must be invalidated because they contain an illegible city or other defects which render those signatures invalid. These signatures along with their individual sheet and line numbers are contained in the attached Appendix under the heading "The following 71 page numbers and line numbers, denoted as

(page#)/(line#) have an illegible city name along with other defects, that render them incapable of verifying the alleged registrants.”

13. The Petition contains individual signatures which must be invalidated because they fail to contain complete addresses for signers which render those signatures invalid. Specifically, the signatures objected to in this paragraph do not contain a city for the signer. These signatures along with their individual sheet and line numbers are contained in the attached Appendix under the heading “The following 16 page numbers and line numbers, denoted as (page#)/(line#) improperly omitted city name.”

14. The Petition contains individual signatures which must be invalidated because they fail to include a county or the county is illegible. These signatures along with their individual sheet and line numbers are contained in the attached Appendix under the heading “The following 22 page numbers and line numbers, denoted as (page#)/(line#) #) have an illegible County name along with other defects, that render them out of compliance with applicable law” and “The following 28 page numbers and line numbers, denoted as (page#)/(line#) improperly omitted County name.”

15. The Petition contains individual signatures which were executed multiple times. These signatures along with their individual sheet and line numbers are contained in the attached Appendix under the heading “The following 4 page numbers and line numbers, denoted as (page#)/(line#) were duplicated elsewhere in the petition.”

16. The Petition contains individual signatures which must be invalidated because they are entirely illegible. These signatures along with their individual sheet and line numbers are contained in the attached Appendix under the heading “The following 276 page numbers and line numbers, denoted as (page#)/(line#) have an illegible registrant name, along with other

defects, that render them incapable of verifying the alleged registrants” and “The following 55 page numbers and line numbers, denoted as (page#)/(line#) have an illegible registrant name, along with other defects, that render them incapable of verifying the alleged registrants.”

17. The Petition contains individual signatures which must be invalidated because they list a post office box as the address as the alleged signer. These signatures along with their individual sheet and line numbers are contained in the attached Appendix under the heading “The following 5 page numbers and line numbers, denoted as (page#)/(line#) impermissibly list a post office box as the address of the alleged registrant.”

18. The Petition contains individual signatures of people whose registered address is other than that listed on the Petition. These signatures along with their individual sheet and line numbers are contained in the attached Appendix under the heading “The following 308 page numbers and line numbers, denoted as (page#)/(line#), impermissibly includes an individual whose registered address is other than that listed on the nominating form.”

19. The Petition contains signatures of individuals who are not registered voters. These signatures along with their individual sheet and line numbers are contained in the attached Appendix under the heading “The following 308 page numbers and line numbers, denoted as (page#)/(line#), impermissibly includes an individual whose registered address is other than that listed on the nominating form.”

20. The minimum number of signatures required for the Petition is 3,000. Based on the above signatures which must be stricken from the Petition, the Petition falls below the minimum signature requirement and thus must not appear on the ballot for the Election.

21. The Appendix is incorporated herein and the objections made therein are hereby

made a part of this Verified Objectors' Petition. Each specific objection is identified by sheet number and line number.

WHEREFORE, Objector, **BRANT DAVIS**, prays that the objections outlined herein be sustained, that the **PETITION FOR NOMINATION** be declared invalid under the applicable laws, and that the name of Candidate not appear on the ballot for the General Primary Election to be held on March 15, 2016.

Respectfully submitted,
BRANT DAVIS

Objector

OBJECTOR VERIFICATION

STATE OF ILLINOIS)
) SS.
COUNTY OF COOK)

The undersigned, BRANT DAVIS, upon oath deposes and says that he is one of the Objectors identified in the above Verified Objectors’ Petition, that he has reviewed the allegations contained in said Petition and is familiar with the matters alleged therein and that such allegations are true and correct to the best of his knowledge.

Objector Brant Davis

Subscribed and Sworn to before me
this 13th day of January, 2016.

NOTARY PUBLIC