

PH

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

16CV1891  
JUDGE DARRAH  
MAG. JUDGE ROWLAND

JAN KOWALSKI,

Plaintiff,

-against-

COOK COUNTY OFFICERS' ELECTORAL BOARD,  
DAVID ORR in his official capacity as Cook County  
Clerk and Chairman, ANITA ALVAREZ, in her official  
capacity as Cook County State's Attorney and Member,  
AND DOROTHY BROWN, in her official capacity as  
Clerk of the Circuit Court of Cook County and Member,

Defendants.

**Complaint for Violation of Civil Rights  
§1983; Violation of the Voting Rights  
Act of 1965; and Violation of Civil RICO  
§1962(c)**

Case No. \_\_\_\_\_

Jury Trial: ☒ Yes ☐ No  
(check one)

**COUNT I: COMPLAINT FOR CIVIL RIGHTS VIOLATION UNDER 42 U.S.C. §1983;**  
**COUNT II: COMPLAINT FOR VIOLATION OF SECTION 2 OF THE VOTING RIGHTS ACT**  
**OF 1965; AND**  
**COUNT III: COMPLAINT FOR VIOLATION OF THE RACKETEER INFLUENCED AND**  
**CORRUPT ORGANIZATIONS ACT ("RICO") UNDER 18 U.S.C. §1962(C)**

**I. The Parties to This Complaint**

**A. The Plaintiff(s)**

1. Plaintiff-Candidate, JAN KOWALSKI ("Jan"), is a resident and registered voter in the City of Chicago, County of Cook and State of Illinois.
2. She is a candidate for election to the Office of the Recorder of Deeds, County of Cook, State of Illinois at the March 15, 2016 Primary Election, and she was a respondent before the Cook County Electoral Board.

**B. The Defendant(s)**

**FILED**

FEB 02 2016

FEB 02 2016

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

3. Defendant, COOK COUNTY OFFICERS ELECTORAL BOARD ("COEB"), is a statutory entity with the power to determine the validity of nomination papers pursuant to the objection procedures set forth in Article 10 of the Illinois Election Code.
4. Defendant, ANITA ALVAREZ, in her official capacity as Cook County State's Attorney and COEB Member.
5. Defendant, DOROTHY BROWN, in her official capacity as Cook County Clerk of the Circuit Court and COEB Member.
6. Defendant, DAVID ORR, in his official capacity as Cook County Clerk and COEB Member and Chairman of the COEB.
7. Defendants, ALVAREZ, BROWN and ORR, have all been COEB Members since at least December 2012.
8. In 2012, ALVAREZ, BROWN and Cook County Recorder of Deeds Incumbent, all presently Democratic candidates for the March 2016 Primary, were lauded by Governor Quinn as the "Dream Team".
9. BROWN is the employer of Recorder Incumbent's husband. BROWN's current re-election website, [friendsofdorothybrown.org](http://friendsofdorothybrown.org), still proudly touts her connection with Recorder Incumbent. The website printout is attached hereto as **Exhibit "A"**.
10. ALVAREZ provided legal advice to the Recorder Incumbent in 2012 to assess if the hiring of Incumbent's sister and niece was permissible. In 2012, ALVAREZ provided a verbal opinion to Recorder Incumbent that the Cook County Board of Ethics had no jurisdiction over the Recorder of Deeds Office. Further, the Ethics Ordinance did not apply to her. In 2014, the Recorder Incumbent confirmed that her sister and niece were hired on the basis of ALVAREZ's advice. See Cook County Board of Ethics Notice of Determination dated 10/29/14, *In the Matter of Karen A. Yarbrough, Recorder Cook County Recorder of Deeds*, Case No. 2013 I 0001 attached hereto as **Exhibit "B"**.
11. Objector is the party who brought the objections against Jan. Objector is a former Village of Maywood trustee and chair of the Finance Committee under Recorder Incumbent's husband's

administration. Respondent-Objector resigned after a report indicated she misused public funds for more than 20 business trips over four years and for donating public funds to a political fundraiser. ALVAREZ declined to prosecute Jaycox. See Walberg, Matthew, Chicago Tribune article "Maywood trustee misused public funds, report says" October 30, 2013 attached hereto as **Exhibit "C"**.

## **II. Basis for Jurisdiction**

12. The hearing of the COEB was held on December 30, 2015 in Chicago, Cook County, Illinois and jurisdiction is proper in the Circuit Court of Cook County.

13. All acts and events occurred in Cook County, Illinois and jurisdiction is proper in Cook County, Illinois.

## **III. Facts Common To All Counts**

14. On November 30, 2015, Plaintiff-Candidate, JAN KOWALSKI ("Jan"), timely filed her Petition for Nomination to the Office of the Recorder of Deeds, County of Cook, State of Illinois ("Nomination Petition").

15. Jan's Nomination Petition contains no less than 13,430 signatures by registered voters in Cook County gathered over the course of ninety (90) days preceding that date contained on 1,374 pages

16. The statutorily-mandated minimum number of signatures by registered Cook County voters which is required for a candidate to be placed on the March 15, 2016 Primary Ballot for the Office of the Cook County Recorder of Deeds is 5,365.

17. Jan's Nomination Petition contains 8,065 MORE signatures than the 5,365 required minimum – nearly triple the minimum number of signatures.

18. The COEB invalidated 8,600 of Jan's Nomination Petition signers 95% of which are African-American voters from Chicago's south side.

19. On December 7, 2015, Objector, Audrey Jaycox, filed her Objector's Petition alleging that Jan's Nomination Petition was insufficient.

20. On December 15, 2015, the COEB adopted Rules of Procedure which are attached hereto as "Exhibit D."

21. From December 17, 2015 at 9:00 a.m. through December 22, 2015 at 6:27 p.m., a “Rule 6 records examination” was conducted by employees of the COEB.

22. During the Rule 6 records examination, the COEB procedures denied Jan a number of substantive rights including:

- a. Jan’s senior citizen supporter being excluded as a watcher;
- b. Presence of several high-ranking Cook County Recorder of Deeds employees as watcher for Objector, including during normal business hours;
- c. Presence of convicted Federal felon, James Blassingame, convicted in Operation Silver Shovel, as watcher for Objector;
- d. COEB employees failed to preserve Jan’s Objections. The partisan politics of the ELECTORAL BOARD employees thwarted Jan’s Objections;
- e. COEB employees failed to attempt good faith search for Jan’s Nomination Petition signers;
- f. COEB employees failed to have available updated voter registration records. More specifically, the COEB voter’s registration records are not synchronized and seamless nor identical with the City of Chicago voter’s registration records. A random sampling of the City of Chicago voter’s registration records was able to locate a significant number in the Chicago system, the voter’s registration records that were “not in system” for purposes of nominating petitions in the County system. See Exhibit “N” attached hereto and incorporated herein which contains the Chicago voters that the COEB’s system was not able to locate in its system.
- g. COEB employees failed to overrule the objection to Jan’s own signature. While Jan was issued a voter’s registration card on August 31, 2015 by the Cook County Board of Election Commissioners, the COEB employees failed to find her voter registration record in the computerized files during the records examination and Jan’s own signature was determined not valid by the improperly trained COEB employees. Jan’s August 31, 2015

Voter's Registration Card is attached hereto and incorporated herein as Exhibit "F1".

Jan's certified Voter Registration Number 016P501 is attached hereto and incorporated herein as Exhibit "F2".

- h. COEB Staff Attorney, Christina T. Lynch, publicly reprimanded Jan, on Sunday, 12/20/15, when Jan voiced her objection to the watcher for the Objector ordering the COEB employee to sustain signatures.

23. On December 17, 2015 at 6:47 p.m., Jan was provided with a Petition Summary Report. The report contains the following: "I acknowledge the completion of the records examination at 12/17/2015 6:47:49 PM." The December 17, 2015 Petition Summary Report is attached hereto as "Exhibit G" and incorporated herein as though set forth fully.

24. On December 18, 2015 at 6:49 p.m., Jan was provided with a Petition Summary Report. The report contains the following: "I acknowledge the completion of the records examination at 12/18/2015 6:49:52 PM." The December 18, 2015 Petition Summary Report is attached hereto as "Exhibit H" and incorporated herein as though set forth fully.

25. On December 21, 2015 at 4:59 p.m., Jan was provided with a Petition Summary Report. The report contains the following: "I acknowledge the completion of the records examination at 12/21/2015 4:59:43 PM." The December 21, 2015 Petition Summary Report is attached hereto as "Exhibit I" and incorporated herein as though set forth fully.

26. On December 22, 2015 at 6:27 p.m., Jan was provided with a Petition Summary Report. The report contains the following: "I acknowledge the completion of the records examination at 12/22/2015 6:27:06 PM." The December 22, 2015 Petition Summary Report is attached hereto as "Exhibit J" and incorporated herein as though set forth fully. The Petition Summary Report reflects "total remaining 0." The Petition Summary Report reflects that Jan's Nomination Petition was 554 signatures fewer than required. Twenty-four (24) hours after this date and time would have been December 23, 2015 at 6:27 p.m. However, the COEB closed at 5:00 p.m. on December 23, 2015.

27. On December 23, 2015 at 7:16 a.m., Jan, through counsel inquired of COEB Staff Attorney, Christina T. Lynch, whether the December 22, 2015 report was the final report. By 2:53 p.m. on December 23, 2015, Jan through counsel again inquired of COEB's Staff Attorney, Christina T. Lynch, whether she had received verification whether the December 22, 2015 Petition Summary Report was the final report. The December 23, 2015 emails are attached hereto as Exhibit "K" and incorporated herein as though set forth fully.

28. On December 23, 2015 at 3:45 p.m., counsel for Jan was advised, in person by COEB's Staff Attorney, Christina T. Lynch, that the December 22, 2015 Petition Summary Report was the final report. Twenty-four (24) hours after this date and time would have been December 24, 2015 at 3:45 p.m. However, the COEB's Offices closed on December 24, 2015, Christmas Eve, at 3:00 p.m. and didn't re-open until December 26, 2015.

29. Jan subsequently determined, on January 28, 2016, when the COEB filed the Administrative Record in the Circuit Court of Cook County, County Department, County Division, Case No. 2016 COEL 1, which contained the complete 97 page Petition Page Report that the "Rule 6 records examination" was **not** final as the COEB had failed to count twenty-three (23) pages of Jan's Nomination Petition and failed to review two hundred thirty (230) signatures of Jan's Nomination Petition.

30. A mere forty-eight (48) minutes after receiving this oral verification of the "final report," on December 23, 2015 at 4:33 p.m., counsel for Jan filed her Emergency Motion to Extend the Deadline for Rule 8 Motion. The December 23, 2015 emergency motion is attached hereto as Exhibit "L" and incorporated herein as though set forth fully.

31. The COEB hearing officer forwarded the emergency motion to Objector's counsel on December 23, 2015 at 6:30 p.m. not asking Objector's position but rather telegraphing Objector's position, "The board employees that conducted The Record Examination, to my understanding, hand on each side a copy of the final report at the time the record exam was completed. Please advise that's your position." [Emphasis added].

32. The COEB's hearing officer denied Jan's Emergency Motion.

33. On December 24, 2015, Jan filed Candidate's Motion to Reconsider Hearing Officer's Order re: Candidate's Emergency Motion to Extend Time to File Rule 8 Motion.
34. On December 24, 2015, Jan timely filed her Candidate's Rule 8 Motion.
35. On December 28, 2015, the COEB Hearing Officer denied Jan's Motion to Reconsider and recommended to the COEB that it sustain Objector's Petition and declare Jan's Nomination Petition invalid.
36. On December 30, 2015, the COEB ostensibly issued its Decision. The Decision bears the signature of Daniel Madden for ORR; Donald Pechous for ALVAREZ; and Gloriz Legette for BROWN. A copy of the Electoral Board Decision is attached hereto as "Exhibit M" and incorporated herein as though set forth fully.
37. Rule 12 requires Decisions to be "executed by members of the Board. In the event that the Board is sitting with only two members, and the two members do not agree as to the validity of any objection, that objection shall not be sustained."
38. Rule 13 notes that "[o]ne member of the Board may attend sessions by audio or video conferencing, when the other two members are physically present at the session."
39. On December 30, 2015, no Board Member was physically present or present by audio or video conferencing.
40. At the December 30, 2015 proceedings, argument was provided by counsel for Objector and Jan.
41. Immediately following argument, counsel for Jan was handed the previously typed COEB Decision bearing the signatures of Daniel P. Madden, Donald J. Pechous and Gloria Legette, not one of which is a member of the ELECTORAL BOARD.
42. The December 30, 2015, COEB Decision sustained the objection as to Jan's Nomination Petition and removed Jan's name, from the March 15, 2016 primary ballot.
43. On January 4, 2015, Jan timely filed her Petition for Administrative Review of the December 30, 2015 COEB Decision.
44. The Decision of the COEB violates JAN's, procedural and substantive due process rights:



- a. ALVAREZ, having personal bias, interest or motive, should have recused herself;
- b. ALVAREZ should not and cannot be allowed to choose if her 2012 running mate runs unopposed in 2016;
- c. ALVAREZ failed to vote in person, telephone or video at the Electoral Board Meeting violating Rule 13;
- d. ALVAREZ cannot delegate her statutory duties to a proxy;
- e. BROWN, having personal bias, interest or motive, should have recused herself;
- f. BROWN employs the incumbent's husband as an employee;
- g. BROWN should not and cannot be allowed to choose if her 2012 running mate runs unopposed in 2016;
- h. BROWN failed to vote in person, telephone or video at the Electoral Board Meeting violating Rule 13;
- i. BROWN cannot delegate her statutory duties to a proxy;
- j. ORR failed to vote in person, telephone or video at the Electoral Board Meeting violating Rule 13;
- k. ORR cannot delegate his statutory duties to a proxy;
- l. Not one single duly-elected County official accountable to the voters of Cook County tendered his or her vote in person in contravention to the Rules of Procedure;
- m. The COEB was improperly constituted.
- n. The COEB failed to render a proper decision.
- o. COEB Staff Attorney, Christina T. Lynch, being personally biased, should have been disqualified and the failure to do so impermissibly tainted the Hearing Officer's impartiality;
- p. COEB's record examination procedure contravened Rule 7 by failing to note Candidate's Objections;

- q. COEB's record examination procedure contravened Rule 6 by failing to allow Jan's designated and duly authorized representative present at the comparison of registration records.
  - r. COEB's record examiners failed to appropriately locate registered voters and failed to compare the signatures on Jan's Nomination Petition with the registration records.
  - s. The computerized registration records of the COEB failed to contain the accurate addresses of registered voters.
  - t. The COEB's Petition Summary Reports were inaccurate with the number of pages, signatures and objections varying daily, notwithstanding these numbers were readily known and ascertainable when the records examination commenced.
  - u. The COEB violated Rule 8 when it failed to timely confirm completion of the records examination until 3:45 on 12/23/15 (said examination having completed at 6:27 p.m. on 12/22/15);
  - v. The COEB violated Rule 8 when it failed find Jan's Rule 8 Motion filed on 12/24/15, within 24 hours after the 12/23/15 "confirmation", to be timely and failed to rule on Jan's timely-filed Rule 8 Motion.
  - w. The COEB violated Rule 11 and abused its discretion in failing to find the interests of fairness and substantial justice did not permit the presentation of new or additional evidence and the re-opening of the hearing.
45. The COEB Decision violates the Cook County voters' procedural and substantive due process rights:
- a. The COEB failed to timely update and maintain its computerized records to accurately reflect voter's addresses;
  - b. The COEB Decision disallowing 8,619 of Jan's 13,430 signatures systematically disenfranchised qualified Cook County voters primarily 95% African-American and impermissible effects "Jim Crow" disenfranchisement.

- c. The COEB Decision impermissibly violated Cook County voters' most fundamental constitutional right to vote in contravention to the first and fourteenth amendments to the United States Constitution and Illinois Constitution.

**COUNT I: COMPLAINT FOR CIVIL RIGHTS VIOLATION UNDER 42 U.S.C. §1983;**

46. Jan incorporates Paragraphs 1 through 45 set forth above as though contained herein fully.
47. Jan has suffered a violation of her constitutionally protected rights under the First and Fourteenth Amendments to the United States Constitution and under the Illinois Constitution.
48. Jan suffered injury caused by the COEB, acting under color of state law, unconstitutionally implementing or executing a policy, custom, usage, regulation, rule, or decision promulgated by the COEB.
49. ALVAREZ deprived Jan of her federal rights and acted under color of state law.
50. ALVAREZ's actions in refusing to recuse herself was willful and intentional conduct that undermined the voting process.
51. BROWN deprived Jan of her federal rights and acted under color of state law.
52. BROWN's actions in refusing to recuse herself was willful and intentional conduct that undermined the voting process.
53. ORR deprived Jan of her federal rights and acted under color of state law.
54. The COEB has engaged in unconstitutional practices contravening Section 1983 and Section 1985, 42 USC 1983 and 1985.
55. The political climate, custom and usage of the COEB including using outdated voter registration information has systematically disenfranchised 8,500 voters from Jan's Nominating Petition being 95% African-American voters and constitutes class-based or racial hostility pursuant to Section 1983 and 1985.
56. The COEB's disqualification of Jan's 8,500 Nomination Petition signers severely burdened Jan's First and Fourteenth Amendment rights under the United States Constitution.
57. The disenfranchisement of 8,500 largely African-American signers of Jan's Nomination Petition by using outdated voter's registration records operates to severely restrict first and fourteenth amendment

rights which restriction is not narrowly drawn to advance the state's interest in minimizing party splintering, excessive factionalism, and ballot clutter. Clearly, ballot clutter will not be a problem since the Incumbent would be allowed to run unopposed.

58. The denial of Jan's timely-filed Rule 8 Motion denied Jan right to due process of law and the ability to demonstrate that the 8,500 disenfranchised voters were validly registered voters in Cook County.

59. Jan has suffered injury as a proximate result of ALVAREZ, BROWN, ORR and the COEB actions in contravention of Section 1983 and 1985.

WHEREFORE, the Plaintiff, JAN KOWALSKI, respectfully requests that this Honorable Court award nominal damages, compensatory damages and punitive damages; and for such other relief as the court deems just and proper.

**COUNT II: COMPLAINT FOR VIOLATION OF SECTION 2 OF THE VOTING RIGHTS ACT OF 1965**

60. Jan incorporates Paragraphs 1 through 45 above, as though set forth fully herein.

61. Section 2 of the Voting Rights Act, 42 U.S.C. Section 1973(2), prohibits the use of any voting procedure or practice which results in a denial or abridgement of the right to vote on account of race or color.

62. The Voting Rights Act is a restatement of the protections afforded by the 15<sup>th</sup> Amendment. *Mobile v. Bolden*, 446 U.S. 55 (1980).

63. In the context of the totality of the circumstances, the COEB's standards, practices and procedures resulted in the denial of a racial minority an equal opportunity to participate in the political process.

64. The deliberate failure of the COEB to maintain updated, seamless, and synchronized voter's registration data for nominating petitions demonstrates a lack of responsiveness to the particularized needs of the Petitioner-Candidate's African-American voters. African-American voters, who due to historical, social and economic factors, may well have households more transient than other voters. The

higher mobility of the African-American voters along with the COEB's failure to maintain updated and synchronized records causes an inequality in the opportunities enjoyed by black and other voters to elect their preferred representatives.

65. Section 2 prohibits local officials from maintaining procedures that purposefully discriminate on the basis of race or color.

66. The procedure of the COEB in deliberately failing to synchronize county and city voting records has been maintained with the intent to harm minority voting strength.

WHEREFORE, the Plaintiff, JAN KOWALSKI, respectfully requests that this Honorable Court award nominal damages, compensatory damages and punitive damages; treble damages; attorneys' fees and for such other and further relief as this Court deems just and equitable.

**COUNT VII: COMPLAINT FOR VIOLATION OF THE RACKETEER INFLUENCED AND  
CORRUPT ORGANIZATIONS ACT ("RICO")**

67. Petitioner-Candidate, JAN KOWALSKI, incorporates Paragraphs 1 through 45 above, as though set forth fully herein.

68. Section 1964(c) of the Racketeer Influenced and Corrupt Organizations Act (RICO) provides for a private civil action to recover treble damages by any person injured in his business or property "by reason of a violation of section 1962."

69. The COEB engaged in conduct as defined in Section 18 U.S.C. §1962(c).

70. The COEB is an enterprise as defined in Section 18 U.S.C. §1962(c).

71. The COEB has engaged in racketeering activity as defined in Section 18 U.S.C. §1962.

72. The conduct of the COEB enterprise has engaged in a pattern of racketeering activity as defined in Section 18 U.S.C. §1962 by its repeated violation of the Voting Rights Act of 1965, Section 1983 and 1985 and the first, eighth, fourteenth and fifteenth amendments to U.S. Constitution and Illinois Constitution Amendments.

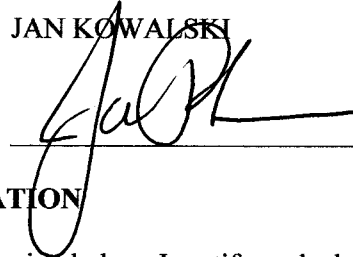
73. Defendants, ORR, ALVAREZ and BROWN, received income directly or indirectly from their conduct on the ELECTORAL BOARD.

74. Defendants, ORR, ALVAREZ and BROWN, violated Section 18 U.S.C. §1962(c) by knowingly agreeing to facilitate a scheme that includes the operation of a RICO enterprise.

75. As a direct and proximate result of Defendants' operation of a RICO enterprise, the Petitioner-Candidate, JAN KOWALSKI, has been injured in her business and property.

WHEREFORE, the Plaintiff, JAN KOWALSKI, respectfully requests that this Honorable Court award nominal damages, compensatory damages and punitive damages; treble damages; attorneys' fees and for such other and further relief as this Court deems just and equitable.

JAN KOWALSKI




**CERTIFICATION**

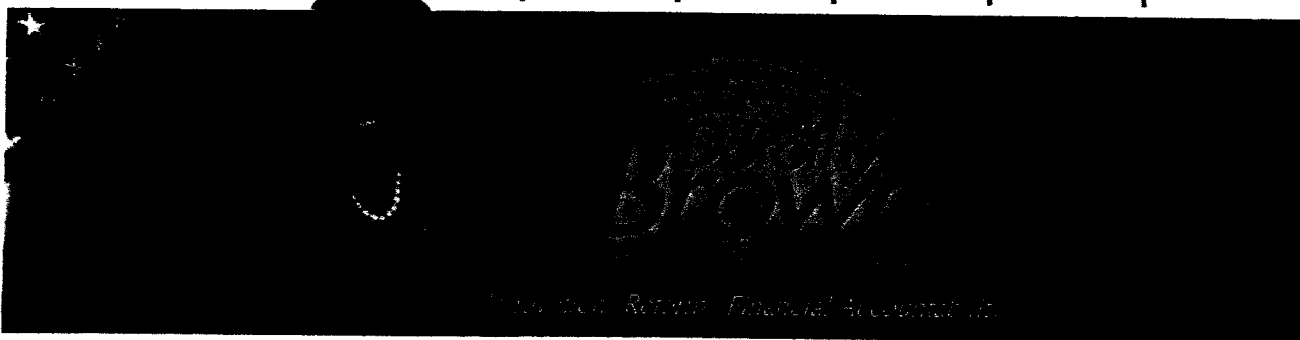
Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 2/2, 2016

Signature of Plaintiff 

Printed Name of Plaintiff Jan Kowalski

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## News

### Capacity Crowd Salute Brown, Alvarez and Yarbrough During Women's Empowerment Event

*Governor Quinn calls slate "Dream Team"*

(Chicago) Political leaders, judicial candidates and supporters filled the Union Hall of Operating Engineers-Local 399, to capacity on Thursday, March 8, 2011 to celebrate the Women's Empowerment event, honoring the first-ever female slate of candidates for Cook County offices. The event was held to kick off Women's History Month celebrated during the month of March.

The event honored Clerk of the Circuit Court of Cook County, Dorothy Brown, State's Attorney Anita Alvarez, and State Representative Karen Yarbrough, candidate for Cook County Recorder of Deeds, who are running together countywide. Actress, playwright and director, **Regina Taylor**, was the special guest who provided remarks about the women and women's history month. "It's important as a woman to know your voice," said Taylor.

Illinois Governor Pat Quinn, Former U.S. Senator Carol Moseley Braun, Former Cook County President Bobbie Steele, and Chicago City Treasurer Stephanie Neely were also in attendance. Governor Pat Quinn expressed his support for the all-female slate, saying, "This is the dream team right here," referring to Brown, Alvarez and Yarbrough. He continued, "I wanted to come here tonight because every time I look up, I see Dorothy Brown setting an excellent example for education and for doing the right thing. This county is larger than 35 states. Running a court system and keeping track of the records in this court system is very hard and very important for justice; and we believe in equal justice under the law ..... so we have to have Dorothy back there." said Governor Pat Quinn

"Under my leadership we not only reduced expenditures, but we raised the revenue to the county by over \$350 million, improved customer service.... we created a mortgage foreclosure surplus portal on our website, and launched electronic filing for court cases."

As Clerk of the Circuit Court I do more than safeguard your records, I fight for you." said Clerk Dorothy Brown.

Brown is running for her fourth term as Clerk of the Circuit Court of Cook County in the primary to be held on March 20.

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Campaign Headquarters: 22 W. Washington Street, Suite 1523, Chicago, Illinois 60602, 773.231.0844

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**COOK COUNTY BOARD OF ETHICS**

69 West Washington, Suite 3040  
Chicago, Illinois 60602

IN THE MATTER OF

Karen A. Yarbrough, Recorder  
Cook County Recorder of Deeds

Case No. 2013 I 0001

**NOTICE OF DETERMINATION**

On May 1 2013, the Cook County Board of Ethics ("Board") received a written complaint alleging that Cook County Recorder of Deeds Karen A. Yarbrough ("Recorder Yarbrough") violated the anti-nepotism provision of the Cook County Ethics Ordinance ("Ethics Ordinance") by hiring her niece to work as an attorney in the Office of the Cook County Recorder of Deeds ("CCRD"). Based on this complaint, the Board undertook an investigation of the allegations and now finds that Recorder Yarbrough did violate Section 2-582(a) of the Ethics Ordinance by employing a relative in an agency over which Recorder Yarbrough exercises authority, supervision and control.

That finding, however, is less remarkable than its result. In the nearly 18 months since the Board opened this matter, Recorder Yarbrough's niece has not only left the County's payroll, but Recorder Yarbrough has committed herself and CCRD to written revisions of CCRD's *Shakman*-monitored Personnel Policy and Procedures Manual ("Manual") to include an express prohibition on the hiring or supervising of relatives. In light of Recorder Yarbrough's commendable progress on this issue and other mitigating circumstances, the Board exercises its authority to not issue additional fines or sanctions.

**INVESTIGATION SUMMARY**

An investigation directed by the Board found evidence of the following:

On May 1, 2013, Cook County Independent Inspector General ("OIIG") Patrick M. Blanchard submitted a copy of OIIG Summary Report IIG13-0045 to the Board, alleging, *inter alia*, that Recorder Yarbrough had hired her niece, Chloë Pedersen (née Woodard), as CCRD Labor Counsel. On May 10, 2013, the Board issued a Notice of Investigation to Recorder Yarbrough, informing her of the alleged violation of the Ethics Ordinance, and requesting her assistance and cooperation with the Board's investigation. On May 31, 2013, Recorder Yarbrough, who at the time was being represented before the Board by Ms. Pedersen, refused to participate in the investigation. Ltr. of C. Pedersen to K. Foxx (May 31, 2013).

Nonetheless, the Board confirmed that Ms. Pedersen was Recorder Yarbrough's niece. A Lexis Comprehensive Person Report indicates an association between Ms. Pedersen and her mother, Denise Williams. A similar report on Denise Williams traces Denise to Recorder

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Yarbrough's father, Donald Williams. While there is the potential for error in the algorithm that Lexis uses to generate potential relatives and associates from common addresses and other shared entries in various public records, Recorder Yarbrough's subsequent counsel (initially Edmund Michalowski and later James Gleffe) allayed any concern of mistaken identity by confirming the familial relationship between Recorder Yarbrough and Ms. Pedersen.

The Board's investigation also confirmed that Ms. Pedersen was employed by CCRD during a time period when Recorder Yarbrough controlled the agency. Records from the Comptroller's Office indicate that Ms. Pedersen became a County employee in the legal Division of CCRD on December 2, 2012. Ms. Pedersen was employed in this capacity for 454 days until her separation from service on February 28, 2014. Records from the Bureau of Human Resources indicate that Ms. Pedersen served as Labor Counsel and later Chief Legal Counsel to the CCRD. Recorder Yarbrough was sworn into office in December 2012 after being elected Recorder of Deeds in November 2012.

After learning that Ms. Pedersen was no longer in Recorder Yarbrough's employ, the Board offered Recorder Yarbrough the opportunity to reconsider her initial non-cooperative stance. Through new counsel (Mr. Gleffe), Recorder Yarbrough represented to the Board in a letter dated September 22, 2014, that prior to hiring Ms. Pederson, CCRD sought the legal opinion of the Cook County State's Attorney's Office ("CCSAO") to assess if the hire was permissible under existing law. In 2012, CCSAO provided a verbal opinion to Recorder Yarbrough that this Board had no jurisdiction over CCRD and the Ethics Ordinance did not apply to her as a separately elected County officer.

In addition, per Mr. Gleffe's September 22, 2014 letter, Recorder Yarbrough confirmed that Ms. Pedersen was hired in December 2012 on the basis of CCSAO's advice. Recorder Yarbrough further elucidated that Ms. Pederson's employment attracted scrutiny from the OIIG and this Board, and so Ms. Pedersen chose to leave CCRD in February 2014. Finally, Recorder Yarbrough "committed that she will not hire any relatives for employment at CCRD." Ltr. of J. Gleffe to R. Hakim (Sept. 22, 2014).

Mr. Gleffe appeared on Recorder Yarbrough's behalf at the Board's September 24, 2014 meeting to answer questions from the Board regarding the circumstances of Ms. Pedersen's employment and Recorder Yarbrough's proposal to not hire relatives going forward. On October 23, 2014, Mr. Gleffe provided the Board with a letter on behalf of Recorder Yarbrough addressing issues the Board raised as concerns, including a clarification that Recorder Yarbrough's commitment to not employ her own relatives at CCRD "extends to all CCRD staff." Ltr. of J. Gleffe to R. Hakim (Oct. 23, 2014). Mr. Gleffe also stated that "[b]ased on the comments and feedback of the Board, CCRD is currently in the process of updating the CCRD Ethics Policy to include [written] provisions that prohibit the hiring of, or contracting with relatives." *Id.* In addition, Recorder Yarbrough proposed requiring each person participating in a hiring decision at CCRD to certify that he or she is not a relative of the applicant. Mr. Gleffe explained that because CCRD's *Shakman* Compliance Administrator ("RCA") must review any changes, updating the Manual to reflect this new commitment could take some time, but Recorder Yarbrough would submit the proposed policy changes to the RCA within the next 10 days.

## DISCUSSION

The Ethics Ordinance prohibits County officials from “participat[ing] in a hiring decision,” “employ[ing] or advocat[ing] for employment” on behalf of “any person who is a relative of said official” with respect to “any agency over which such official . . . exercises authority, supervision or control.” Cook County Code of Ordinances (“County Code”), § 2-582(a). Relatives include, for the purpose of this provision, an official’s niece. *Id.* at § 2-582(f). As the Board has explained in previous Section 2-582 cases:

[the anti-nepotism provision of the Ethics Ordinance] was enacted because the hiring and or employing of family members as County employees undermines the public trust. Rather than promote an open and transparent governmental hiring process, this conduct promotes the opposite, a closed and opaque process. The Board finds that allowing this conduct to proceed unchecked and unchallenged bestows an unfair advantage onto those with familial connections, and that this conduct is in direct contravention of the letter and spirit of the Cook County Ethics Ordinance which this Board has been entrusted to enforce by the Cook County Board of Commissioners.

Board of Ethics Notice of Determination (“Bd.E Not.”), 11 I 0001(I), \*2 (June 20, 2012).

In this case, there is no dispute of fact as to whether Recorder Yarbrough has exercised authority, supervision and control over CCRD since being sworn in as the Cook County Recorder of Deeds in December 2012. Further, the Board’s investigation leaves no doubt that Ms. Pedersen was employed by CCRD during Recorder Yarbrough’s term of office and that Ms. Pedersen was (and is) Recorder Yarbrough’s relative. As such, the Board determines that Recorder Yarbrough violated Section 2-582(a) of the Ethics Ordinance by employing Ms. Pedersen in CCRD from December 2, 2012 to February 28, 2014.

In rendering this determination, the Board is not impugning the service that Ms. Pedersen rendered the County during her term of public employment. The Board has no evidence before it that would lead it to believe that Ms. Pedersen was anything other than a diligent and dedicated public servant while at CCRD, but the prohibition against County officials, appointees and employees hiring their relatives is strict. While it is true that nepotism typically bestows an unearned advantage on those with familial connections, the Ethics Ordinance does not provide an exception for exceptionally well qualified individuals. Nor, in the absence of a scienter requirement, does it excuse County officials who may have hired a relative on the basis of erroneous legal advice.

Instead the requirements of the Ethics Ordinance are absolute and universal. No County official, appointee or employee may hire a relative into his or her County agency. Any transgression of this simple and plain prohibition is a violation of the law.

Recorder Yarbrough does not contest any of the facts that form the basis of the Board’s determination here, but has nonetheless moved for a finding of no violation on the basis of the length of the Board’s investigation into this violation. An investigation by the Board begins with a written complaint. Cook County Board of Ethics Amended Rules and Regulations (“Bd. E.”),

Rule (“R.”) 5.1. The Board’s Rules instruct the Executive Director to determine within thirty days of receipt whether there is reasonable cause for an investigation. Bd.E.R. 5.10(A). If the Executive Director believes there is cause to proceed, the Board’s Rules state that “[a]n Investigation of an alleged violation of the Ethics Ordinance shall be completed no later than one (1) year from the date the Investigation was initiated.” Bd.E.R. 5.3. “The Board may extend the one (1) year time limit for completion of the Investigation when there is good cause show[n] to warrant such an extension.” *Id.*

Here, the Board received a written allegation from the OIIG that Recorder Yarbrough had violated the Ethics Ordinance on May 1, 2013. Within 30 days, then-Executive Director MaryNic Foster determined that there was reasonable cause to initiate an investigation and issued a Notice of Investigation to Recorder Yarbrough on May 10, 2013. However, the Board did not receive the Report of Investigation in this matter until September 17, 2014. Recorder Yarbrough’s reliance on what she characterizes as a four-month delay in completing the investigation, however, is misplaced.

As this Board has explained previously, “Rule 5.3 sets out the Board’s expectations for its staff with respect to the scope and timeline of any pending investigation; it does not create a statute of repose or substantive right for litigants to a resolution of matters pending before the Board by a date certain.” Bd.E Not., 12 I 0001, \*3 (April 16, 2014). Moreover, the one-year target the Board has established for its staff assumes that an investigation respondent has complied with his or her obligation under the Ethics Ordinance to cooperate with the Executive Director in that investigation. *See* County Code, § 591(7) (“The executive director shall investigate alleged violations of this article. County agencies, employees and officials shall cooperate with the Board and the executive director. Information necessary to any investigation shall be made available to the Executive Director upon written request.”). Recorder Yarbrough declined to participate in this investigation until after the Executive Director submitted his Report of Investigation recommending that this Board find a violation of the Ethics Ordinance. Recorder Yarbrough cannot now gain the advantage of a delay that is of her own creation.<sup>1</sup> Such a delay is certainly good cause for an extension of time to complete an investigation under Rule 5.3.

#### RECOMMENDATION

The Board has the authority to assess fines up to \$5,000 per violation of Section 2-582. *See* County Code, § 2-602(d). However, the Board has determined that such penalties are unnecessary in this case.

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<sup>1</sup> Recorder Yarbrough’s reliance on *McElroy v. Cook County*, 281 Ill. App. 3d 1038 (1st Dist. 1996) (cited in Ltr. of J. Gleffe to R. Hakim (Oct. 28, 2014)) is similarly misplaced. Even if Rule 5.3 were more than an internal directive, Recorder Yarbrough would have to show that she was denied the opportunity to be heard and that the delay in completing the investigation prejudiced her defense in order to have a viable due process argument. *See Cooper v. Dept. of Children & Family Servs.*, 234 Ill. App. 3d 474, 486 (4th Dist. 1992). Recorder Yarbrough has done (and can do) neither. She was offered repeated opportunities over the months of this investigation to participate, and her counsel has not even theorized an injury to Recorder Yarbrough arising from the Executive Director submitting his report to this Board in September instead of May.

The injury to the public trust is not ongoing. Ms. Pedersen is no longer a County employee. Whether on her own initiative or at Recorder Yarbrough's suggestion, the evidence before the Board is that Ms. Pedersen moved on in response to this investigation (and others) so as to not distract CCRD from its efforts to better serve the public. In addition, although CCSAO's erroneous pre-hiring advice does not excuse Recorder Yarbrough's violation of the Ethics Ordinance, that Recorder Yarbrough sought it out demonstrates that she was attempting to conform her conduct to the law before deciding to hire Ms. Pedersen.<sup>2</sup>

More importantly, the injury to the public trust is unlikely to reoccur. Recorder Yarbrough has committed to adopting a written anti-nepotism policy for inclusion in CCRD's *Shakman*-monitored personnel manual. This policy closely mirrors Section 2-582 of the Ethics Ordinance and prohibits individuals in CCRD from employing or contracting with their relatives. While sanctions are sometimes necessary to punish nonconformity with the law, the true aim of the Board's enforcement of the Ethics Ordinance is to encourage County officials, appointees and employees to conduct themselves in an ethical and lawful manner. By internalizing a policy that prevents both herself and her supervisees from hiring their relatives into CCRD on a going forward basis, Recorder Yarbrough has provided, albeit somewhat belatedly, a model response to an ethics complaint.

The Board offers its assistance to Recorder Yarbrough in following through with her commitment to present the draft proposals included in Mr. Gleffe's October 23, 2014 letter to the RCA within the next 10 days. *See* Ltr. of J. Gleffe to R. Hakim, Exhs A-B (Oct. 23, 2014). Pursuant to Section 2-591(9) of the Ethics Ordinance, the Board requests only that CCRD provide this Board with written confirmation that these (or substantially similar) proposed amendments were submitted to the RCA for review within 30 days of receipt of this notice.

In the spirit of the newly opened lines of communication between this Board and CCRD, it would be remiss to conclude without noting one remaining point of disagreement between the Board and Recorder Yarbrough. Prior to assuming a more cooperative stance, Recorder Yarbrough initially refused to participate in this investigation on the belief that the Ethics Ordinance did not apply to her as a separately elected County official. *See* Ltr. of C. Pedersen to K. Foxx (May 31, 2013). She later refined her position to be that she was beyond the jurisdiction of the Ethics Ordinance with respect to at least Section 2-582 – an instance in which the County's ethics rules are more stringent than their state analogs. *See* Ltr. of D. Gallagher to K. Yarbrough (July 14, 2014) (citing the State Officials and Employee Ethics Act, 5 ILCS 430/70-5). And today, although she is taking meaningful action towards prohibiting nepotism in CCRD, Recorder Yarbrough continues to reserve the right to contest the Board's jurisdiction to enforce the Ethics Ordinance with respect to her office. *Ltr. of J. Gleffe to R. Hakim* (Sept. 22, 2014). While the Board hopes that self-enforcement of the proposed anti-nepotism policy within CCRD will, as a practical matter, obviate the need to do so, this Board stands ready to enforce Section

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<sup>2</sup> Going forward, the Board invites Recorder Yarbrough to seek advisory opinions from this Board on any matters pertaining to the Ethics Ordinance. *See* County Code, § 591(10). While the opinions of CCSAO regarding the Ethics Ordinance are interesting, it is the opinion of the administrative agency charged with enforcing a particular ordinance that takes precedence in the eyes of a reviewing court. *See, e.g., Bonaguro v. County Officers Electoral Board*, 158 Ill.2d 391, 399 (1994).

2-582 (and every other provision of the Ethics Ordinance) with respect to all County officials, appointees and employees, including those in CCRD.

The argument that the Ethics Ordinance does not apply to separately elected County officials is fallacious. The Ethics Ordinance by its own terms applies to all "officials" where that term is defined to include any elected or appointed "County official" without regards to compensation. County Code, §§ 2-562, 2-561. Per the 1970 Illinois Constitution, the Recorder of Deeds is a county official. 1970 Ill. Const., Art. VII, § 4(c).

The argument that broad application of the Ethics Ordinance to separately elected County officials is somehow unconstitutional is similarly misguided. The Illinois Constitution provides that all County officials, including separately elected County officials, "shall have those duties, powers and functions provided by law *and those provided by county ordinance.*" 1970 Ill. Const., Art. VII, § 4(d) (emphasis supplied). The clear intent of section 4(d) is that County officials are required to adhere to both State laws and County ordinances simultaneously, without the former necessarily pre-empting the latter.

Although some aspect of a County official's job may be governed by state law, this does not forever place every action that the County official takes outside of the jurisdiction of County government. To the contrary, state law expressly provides that while "[n]o county board may alter the duties, powers and functions of county officers that are specifically imposed by law," a county board, "*may . . . impose additional duties, powers and functions upon county officers.*" 55 ILCS 5/5-1087 (emphasis supplied). As Illinois courts increasingly recognize, *see, e.g., Blanchard v. Berrios*, 2013 CH 14300, \*10 (Circuit Court of Cook County, Jan. 15, 2014) (rejecting the argument that complying with the Independent Inspector General's Ordinance would unconstitutionally diminish the power of a separately elected County official because the Circuit Court "cannot say that investigating fraud or waste in Cook County government is beyond the scope of the home rule power granted to the County"), enacting ethics rules in an attempt to increase ethical behavior by its public officials, and to ensure that the public funds of a County are spent in an ethical manner, falls squarely within the very broad general power of a home-rule county "to regulate for the protection of the public health, safety, morals and welfare." Ill. Const., Art. VII, § 6(a) (1970). Compliance with the Ethics Ordinance is a constitutional additional duty imposed on separately elected County officials.

As such, while the Board will make every effort to ensure the success of a credible and enforceable internal ethics policy at CCRD, the Board will not ignore a subsequent complaint of unethical activity in any County agency. The Board is deeply encouraged by the newly opened lines of communication between itself and CCRD. It is the Board's hope that these lines of communication will remain open to resolve future complaints under the Ethics Ordinance more expeditiously.

#### CONCLUSION

For the forgoing reasons, with respect to the above-captioned matter, the Board of Ethics concludes that Recorder Yarbrough VIOLATED Section 2-582 of the Ethics Ordinance. The Board of Ethics declines to issue any fines or additional sanctions but has requested notification when CCRD's proposed written anti-nepotism policy is submitted to the RCA for review and

inclusion in the CCRD Manual within 30 days of receipt of this notice. Any request for reconsideration of this determination must also be made within 30 days of receipt of this notice.

October 29, 2014

So ordered  
COOK COUNTY BOARD OF ETHICS

A handwritten signature in dark ink, appearing to read "Roseann Oliver", written over a horizontal line.

Roseann Oliver  
Chairperson



## Maywood trustee misused public funds, report says

**Sheriff's office claims official used tax dollars for business trips**

October 30, 2013 | By Matthew Walberg, Chicago Tribune reporter

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The Cook County sheriff's office criticized a Maywood trustee for spending thousands of dollars in public money for more than 20 business ↗ trips over four years and for donating public funds ↗ to a political fundraiser.

The sheriff's department alleged in a report that Audrey Jaycox violated a village ordinance prohibiting elected officials from taking more than two work-related trips per year using public money.

It's gone. [Undo](#)

What was wrong with this ad?

- ☐ Inappropriate
- ☐ Repetitive
- ☐ Irrelevant

Google

Jaycox also "violated the state elections statute" earlier this year when she used \$200 in village funds to buy two tickets to a political event for state Sen. Kimberly Lightford, according to the sheriff's report.

This is the first report issued by the sheriff's office ↗ in its newly adopted role as an independent investigator for suburban governments.

C

The document ¶ alleges that Jaycox far outspent her annual discretionary fund ¶ in two of the four fiscal years in question — from 2010 to 2013 — with the bulk of the money going for travel to leadership conferences in such cities as Tampa, New Orleans and Washington.

Sheriff's officials said that none of the expenditures appear to have been for personal gain, but questioned how the trips served Maywood residents.

The sheriff's office forwarded the report to the Cook County state's attorney's ¶ office for review. The state's attorney did not respond to a request for comment.

Jaycox, a trustee since 2005, declined comment, saying she had not seen the report. According to the report, Jaycox said that village rules regarding discretionary funds and travel were discussed when she was elected, but were not reviewed often and no one questioned her about the trips.

Jaycox said the luncheon for Lightford was not political, but a fundraiser for "girls and women ¶," the report said.

Sheriff Tom Dart's office was brought in by the village in July, after he offered to serve as independent inspector general to every suburban municipality at no cost ¶.

Maywood Mayor Edwenna Perkins said that Jaycox should have known better.

"She knew the rules," Perkins said. "She's been a trustee since 2005, and she was chair of the finance committee."

Trustee Ronald Rivers said he believes Jaycox's trips are part of her efforts to boost the suburb, and called the allegations politically motivated.

"If people knew how much time she puts in," he said. "I think this is a witch hunt."

The report said documents ¶ suggest that other officials violated village rules on the use of public funds, and the sheriff's office said there may be other investigations.

The sheriff's office suggested the village beef up internal controls over how funds are spent and consider eliminating discretionary spending for trustees.

*mwalberg@tribune.com (mailto:mwalberg@tribune.com)*

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**RULES OF PROCEDURE ADOPTED BY THE COOK COUNTY OFFICERS  
ELECTORAL BOARD FOR THE HEARING AND PASSING UPON OF  
OBJECTIONS TO THE NOMINATION PAPERS OF CANDIDATES  
FOR OFFICES WHICH ARE COTERMINOUS WITH OR  
LESS THAN THE COUNTY OF COOK, STATE OF ILLINOIS**

Rule 1. Appearances and Appearance Forms. Appearance by an objector or by a candidate at the hearing on objections may be in person or by counsel. All parties appearing before the Board must file a completed Appearance form. On the Appearance form each party must provide the Board with a telephone number, an e-mail address and other contact information at which that party can be reached at any time during the day and at night. The parties must receive service of documents at the e-mail address provided, or make alternative arrangements for service. The Board will provide the parties with e-mail addresses at which papers may be served on the Board or upon its Hearing Officers. These rules also apply to cases before the Board involving objections to referendum petitions, and to proponents and opponents of the petitions.

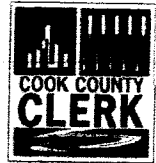
Rule 2. Initial Hearing. On the day set for the hearing of objections, both the objector and the candidate may be required to be present in person or by counsel and to be ready for the initial hearing or scheduling of their case. The Board may, at its discretion, waive the need for the parties to appear at the hearing on the initial day of the Board's sessions.

Rule 3. Scheduling and Hearing Officers. When appearance at the initial day of hearings is required, the Board will grant continuances of initial hearings on objections only for good cause shown. The Board may schedule proceedings in a case to extend beyond the initial day set for hearing. The Board may, in its sole discretion, on the day of the initial hearing of a case or thereafter, assign any part of a case to a Hearing Officer to conduct proceedings, hear evidence and arguments, recommend findings of law and fact, and report to the Board. The Hearing Officer shall have all powers of the Board provided in these Rules, except the power to issue subpoenas or issue a final decision.

D

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**Rule 4. Defaults.** If a *candidate* or *proponent of a question of public policy* fails to appear for the initial hearing at which appearance is required, a decision in the nature of a default judgment may be entered and the objections contained in the objector's petition shall be confessed against the candidate, but only upon a determination by the Board that the objector's petition sets forth valid grounds, a colorable claim, for the removal of the candidate's name from the ballot.

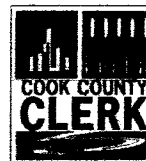
If an *objector* fails to appear for the initial hearing at which appearance is required, the Board may, in its sole discretion, default the objector and dismiss the objection. The Board has the sole discretion as to grant or deny a motion to withdraw an objection or objections. The Board may, in its sole discretion, require a preliminary showing of proof on the validity of any objection or may order a partial check of some portion of the allegations of an objection.

**Rule 5. Preliminary Motions.** Preliminary motions and objections to an objector's petition in the nature of a motion to strike the objections may be heard first or taken with the case-in-chief. If sufficient objections to an objector's petition are sustained, the objector's petition shall be overruled and the petitions held valid. If objections to a portion of an objector's petition are sustained, that part of the objector's petition shall be overruled.

**Rule 6. Record Examinations.** The permanent voter registration records of the jurisdiction or jurisdictions involved shall be received as evidence with respect to all objections to which the material contained in such records is relevant. Relevant issues include, but are not limited to, whether the signer is a registered voter; whether the signer is a qualified elector; whether the signature on the petition is that of a registered voter whose signature it purports to be; whether the signer or the candidate are residents of the political subdivision involved for the period required; and whether the signer is registered to vote at the address shown beside the signature on the petition in question. The Board may make appropriate provisions when an election authority has computerized its registration records, or otherwise created electronically-stored registration records.

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When ordered by the Board or a Hearing Officer, petitions and objections shall be compared with those registration records by the Office of the County Clerk's Election Department or the Chicago Board of Election Commissioners or both. The objector and the candidate each shall have the right to have designated and duly authorized representatives present at such comparison during their good conduct. The comparison shall commence at the time specified by the Board or a Hearing Officer and the failure of the candidate, objector or their duly authorized representatives to timely appear for said comparison shall neither delay nor in any way affect the validity of the comparison. Notice to the parties will be given at a hearing before their assigned Hearing Officer, via the telephone numbers or e-mail addresses listed on their Appearance forms and notice may be given as late as 9:00 p.m. the evening before the scheduled record examination.

**Rule 7. Record Examination Objections.** Representatives of the objector or candidate may object to the findings of the election authority's representative, which objection shall be noted by the election authority's representative. In no case shall a review of the result of the examination of an individual record or the presentation of additional evidence as to that record be permitted when no objection to the finding was made and recorded at the time of the comparison. **It is the responsibility of the candidate or objector or their representatives to insure that any objection is recorded and preserved.**

**Rule 8. Review of Record Examination Objections.** Following the examination of the registration records, any candidate or objector who has made timely objections to the findings of the examinations and who requests so in writing, may have a further hearing as to the results of the records examination at a time fixed by the Board or Hearing Officer before the Board or the Hearing Officer rules on the findings from the examination. This request shall be styled "Rule 8 Motion". Such Motion must specify, for each finding objected to, the sheet, line, name and address of the petition signer, and other information as is appropriate including the basis of the objection to the finding. The information required in the Motion must be set forth fully therein and not by way of reference to, or incorporation of, any other document. The Motion must be delivered to the opposing party or parties and the Board within 24 hours after the completion of the examination, (or the latter of the examinations, if separate examinations are held by the County Clerk and the Chicago Board of Election Commissioners) without any additional action by the Board, an Election Authority or the parties. At the hearing on the Motion, the parties may present

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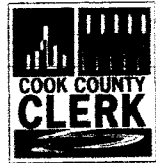
evidence including, but not limited to, affidavits as to the genuineness of signatures and live testimony. Affidavits presented to the Board must be sworn to, signed and notarized before a notary public.

In respect to motions under this Rule, and other matters the Board will consider such other evidence as may be submitted, including, but not limited to, other documentary evidence, affidavits, and oral testimony. In view of the fact that the Board must hear and pass upon objections within a limited time, extended examination and cross-examination of witnesses will not be permitted. The Board will not be bound by rules of procedure or rules of evidence which obtain in courts of law, although it may take guidance from such rules.

**Rule 8A. Subpoenas.** Subpoenas and subpoenas *duces tecum* will be issued under the authority of the Board only upon a vote of a majority of its members. When a case has been assigned to a Hearing Officer, a party must submit a written motion, either at a hearing or by email, for any subpoena, setting forth the particulars of the requested subpoena, justification for its issue and a copy of the requested subpoena. If presented at a hearing, the motion must be served on the opposing party at that hearing. If presented by email, the motion must be served on the opposing party by email simultaneously. The opposing party has 24 hours to file an objection to the motion by email with the Hearing Officer and the opposite party. A motion not objected to will be granted as a matter of course, through the process set out below. If an objection is received, the Hearing Officer shall issue a recommended ruling on the motion within 24 hours and forward the filings and the recommendation to the Board. The Board members shall consider them and each member shall make a determination of "Grant" or "Deny" on the motion and transmit the determination to the Chairman. If two or more members of the Board determine that the motion be granted, the Chairman shall be authorized to issue the subpoena(s).

**Rule 9. Scope of the Case.** Within the parameters of the law, the Board will only consider written objections and the written specifications of such objections to the original petitions, as set forth in the objector's petition as initially filed. The objector's petition may not be amended. No answer or response to the objector's petition need be filed.

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**Rule 10. Case Parameters.** All arguments of counsel and evidence must be confined to the points raised by the objections and specifications, if any, to the objector's petition, and by the objector's petition and specifications with respect to the nomination papers. The parties shall be limited to 15 minutes each for the presentation of their case, unless the Board extends the period of presentation.

**Rule 11. Request for Review of a Hearing Officer's Recommendation by the Board.** A candidate, proponent of a question of public policy, or objector who disagrees with the recommendation of a Hearing Officer may ask the Board to review the Hearing Officer's recommendation and hear additional arguments from the parties or their attorneys. To do so, a party must provide notice by email to the Board and to the opposing party within 24 hours of receiving the recommendation of the Hearing Officer. When such a notice has been served, all parties must appear before the Board on the date it schedules its public meeting to consider the Hearing Officer's recommendation in their particular case. The Board or a Hearing Officer may shorten the time required for notice to be served. A party may file a memorandum setting forth the basis for that party's disagreement with the recommendation of the Hearing Officer. The parties may not introduce new evidence for review as the Board will be bound by the record of proceedings before the Hearing Officer. The Board, however, will have discretion to determine if the interests of fairness or substantial justice permit the presentation of new or additional evidence or the re-opening of the hearing. A request for review by the Board under this Rule is not jurisdictional for purposes of judicial review of a decision of the Board under Section 10-10.1 of the Election Code.

**Rule 12. Decisions.** If the objections to the nomination papers, or sufficient part thereof, are sustained, the nomination papers will be held invalid, and the Board will state its findings in a decision in writing, noting the objections which it has sustained. A decision may be executed by members of the Board in counterparts. If the objections, or a sufficient part thereof, are overruled, the nomination papers will be held valid, and the Board will state its findings in a written decision. The written decision of the Board shall be served upon the parties pursuant to law. In the event that the Board is sitting with only two

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members, and the two members do not agree as to the validity of any objection, that objection shall not be sustained.

Rule 13. Electoral Board Sessions. After the Board initially convenes, it will be in session continuously until all objections transmitted to it have been considered and disposed of, and, if necessary, in the sole discretion of the Board, its session will be extended or recessed from time to time. One member of the Board may attend sessions by audio or video conferencing, when the other two members are physically present at the session.

Honorable David Orr, County Clerk of Cook County, Chairman

Honorable Anita Alvarez, State's Attorney of Cook County, Member

Honorable Dorothy Brown, Clerk of the Circuit Court of Cook County, Member

**COOK COUNTY OFFICERS ELECTORAL BOARD**

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, COUNTY DIVISION**

**JAN KOWALSKI,**

PETITIONER,

## VERSUS

COOK COUNTY OFFICERS ELECTORAL BOARD,

ANITA ALVAREZ; DOROTHY BROWN; and

DAVID ORR, Chairman; DAVID ORR, in his

official capacity as Cook County Clerk; and

**Audrey Jaycox, Objector,**

## RESPONDENTS.

No. \_\_\_\_\_

**AFFIDAVIT OF JAN KOWALSKI**

I, Jan Kowalski, under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, 735 ILCS 5/1-109 (2015), certify that the statements set forth in this instrument 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:

1. I am a resident of the State of Illinois.
2. I have personal knowledge of the facts set forth in this affidavit and, if called as a witness at trial or hearing, I can testify to them.
3. I am an attorney licensed to practice in the State of Illinois and my licensure is in good standing.
4. My business address is 1918 West Cermak, Chicago, Illinois 60608. My phone number is 773-696-9698. My email address is jdma22@hotmail.com.
5. On November 30, 2015, I filed with the Office of the Cook County Clerk my petition for nomination to the office of the Cook County Recorder of Deeds containing 1374 pages with space for 10 signatures per page. .
6. The election code requires 5,365 signatures by registered voters in Cook County in support of my petition for nomination.
6. On December 7, 2015, I was informed that a Ms. Audrey Jaycox had filed a challenge to my petition.

E

7. I subsequently learned through a simple google search that Ms. Jaycox was allegedly a former Village Trustee with the Village of Maywood who had resigned office amidst a report disclosing the Village had paid for 20 "business trips" Ms. Jaycox had made during her tenure as the Finance Committee chair and amid questionable Village expenditures including political fundraisers. I also learned there were allegations that Ms. Jaycox had her basement remodeled at no cost by the Village of Maywood Director of Public Works.

8. On Tuesday, December 15, 2015, I was advised by my attorney, Deborah Moldover, that I needed at least four people on my behalf present at the Board of Elections for a signature challenge on Wednesday, December 16, 2015 at 9:00 a.m.

9. I subsequently came to learn that a signature challenge or "binder check" involves a challenger, a hearing officer and a candidate having personnel available to go line-by-line through each of the 1353 pages of my nomination petition attempting to verify the signature and address of each signer.

10. On Wednesday, December 16, 2015, as I had Court in the Federal District Court for the Northern District of Illinois at 9:00 a.m., I had a senior citizen supporter and three of my campaign workers scheduled to be present until I could be available.

11. My senior citizen supporter was there at the Board of Election at 69 West Washington Street on the 5<sup>th</sup> Floor at 8:30 a.m. She signed in, was given a placard and told to wait.

12. Shortly after 9:00 a.m. an announcement was made that "Everyone can go back" and she proceeded, along with the other people present to go to the back computer room. However, my senior citizen supporter was told by an employee of the Board of Election, "Not you. Wait there." [pointing to the row of four chairs]. My senior citizen supporter waited until around 9:15 a.m. or so when another of my campaign workers arrived and saw her sitting there. He then ushered her back to the computer room.

13. No one advised her how the signature verification process was supposed to proceed.

14. My senior citizen supporter sat watching the hearing officer and the challenger going line-by-line signature-by-signature unbeknownst that she had three opportunities to locate the voter and unbeknownst she had the ability to "OBJECT" to the determination of the hearing officer.

15. When I arrived around 10:30 a.m., my senior citizen supporter advised me what had happened and when I asked her if she had objected she said, "I didn't know I could," and broke down in sobs.

16. I met Mr. James Blassingame who sat on behalf of the challenger. Apparently, he had been convicted in Operation Silver Shovel.

17. I met, Mr. Cedric Giles, son of a prominent politician who had also been convicted in Operation Silver Shovel. I asked him why he was the highest paid employee of the Cook County Recorder of Deeds Office. I asked him why he earned more than the incumbent Recorder. I said that he must be the best deed recorder they had and asked him how many deeds he records, he responded, "Millions."

18. I met Jim Drobitsch a deputy clerk at the Office of the Recorder of Deeds. I asked why he wasn't working that week and whether the Recorder's Office had a use-it-or-lose-it vacation policy. He declined comment. I did not ask him about Mr. Christianson or his role in the politically-motivated firing which cost the county taxpayer's \$90,000.

19. I met one of Ms. Preckwinkle's top aides.

20. I met Brian Cross a deputy clerk at the Office of the Recorder of Deeds.

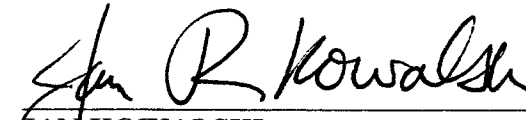
21. Some of the hearing officers would type in one address and if the name didn't appear would sustain the signature and go on – regardless of the fact that the handwritten address which were often signed on el, train and bus platforms and done hastily may well have been a 3, 5, 7 or 1 and regardless of whether the address were Eggleston or Ingleside.

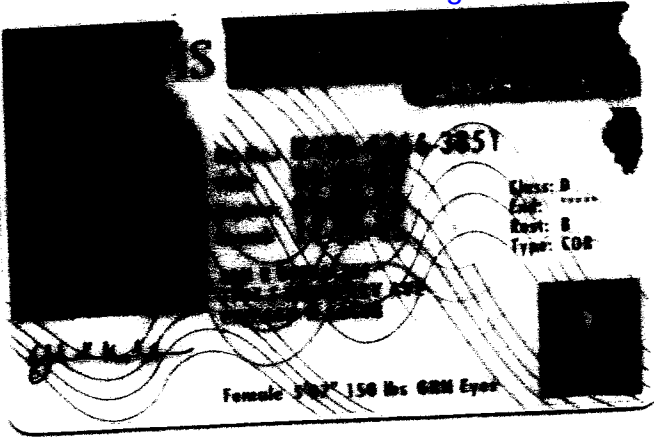
21. On Sunday, December 20, 2015, I was stationed with an employee of the Office of the Recorder of Deeds who was particularly vicious along with a new board of election employee. The watcher became very verbally abusive and argumentative, counting the number of attempts – attributing the election employees attempts as mine, disputing it was a "c" or a "p", attempting to bully and direct the election employee how to rule, "Of no, that's not a p" "Oh no, that's not the signature." The election employee was repeatedly being kow-towed and bullied by the watcher for the challenger. I repeatedly attempted to intercede. The managers in the room were repeatedly called over. Finally, a young female Caucasian woman quite obviously pregnant came into the room and approached me and began finger pointing and publicly chastising me. She said she had "been told" I was difficult. She said we'd have to come back on Monday. I said that that was fine as I was not going to have the challenger direct the election employee how to rule. We changed the employee without further incident.

22. Over the course of the seven-day process, the impartial election employees became clearly biased and openly antagonistic. Some of the more egregious examples included becoming signature experts such as disallowing Mr. Barnes signature because it was more like Mr. Bar-dash, disallowing another signature which was clearly legible while the voter signature card was a dash and disallowing another signature who had signed "Morgan Larry" instead of "Larry Morgan". Other examples included not allowing objections to be registered because, although timely orally made, the election employee had already clicked the boxes to go to the next entry. Finally, when coming across an alleged duplicate signature, leaving the station – going across the room – and coming back and clicking the box and going to the next entry without showing the alleged

duplicate to the watcher. After I had objected to this process and gotten up to look at the signature at the other station, when I came back, the hearing officer had already gone through two more signatures in my absence, without any objection.

23. At the beginning of the last day, Tuesday, December 22, 2015, Mr. Blassingame told one of my campaign workers that we were going to be 500 signatures short of the 5,365 required. I had gone over my numbers and, by my count, I was 260 signatures over the 5,365 required minimum. Coincidentally, the final tally that day reflected I was 554 short of the 5,365 required minimum signatures.

  
\_\_\_\_\_  
JAN KOWALSKI



Prec.	Ward	Cong.	State Sen.	State Rep.	Judicial	Cnty. Brd.	BOR
3	11	4	1	2	14	7	2

VoterID 016P501 Issue Date: 08/31/2015

KOWALSKI, JAN  
1711 S NEWBERRY AVE  
CHICAGO, IL 60608

F

MARISEL A. HERNANDEZ, *Chairwoman*  
WILLIAM J. KRESSE, *Commissioner*  
ONATHAN T. SWAIN, *Commissioner*



CHICAGO, ILLINOIS 60601  
(312)269-7900  
FAX (312)263-3649  
TTY (312)269-0027  
WWW.CHICAGOELECTIONS.COM  
E-mail Address: CBOE@CHICAGOELECTIONS.NET

LANCE GOUGH *Executive Director*

STATE OF ILLINOIS     )  
                                  )     SS  
COUNTY OF COOK     )

I, Lance Gough, Executive Director of the Board of Election Commissioners in the County and State aforesaid and keeper of the records and files of said Board, do hereby certify that the following named person is a registered voter. This individual is currently registered at the address indicated below;

NAME:                     JAN KOWALSKI  
  
ADDRESS:                 1711 S NEWBERRY AVE  
                              CHICAGO, ILLINOIS 60608  
  
REGISTRATION NO:        016P501

and that a copy of the original registration card and voter change information(if any) is attached, all of which appears from the records and files of said Board.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the Seal of said Board at my office in the City of Chicago, this  
8th day of January A. D. 2016

LANCE GOUGH  
*Executive Director*

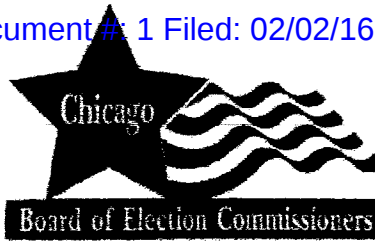
Commissioners

MARISEL A. HERNANDEZ, *Chairwoman*

WILLIAM J. KRESSE, *Commissioner*

JONATHAN T. SWAIN, *Commissioner*

LANCE GOUGH *Executive Director*



69 WEST WASHINGTON STREET  
CHICAGO, ILLINOIS 60602

(312)269 - 7900

FAX (312)263 - 3649

TTY (312)269 - 0027

WWW.CHICAGOELECTIONS.COM

E-mail Address: CBOE@CHICAGOELECTIONS.NET

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**Changes for 016P501 - JAN KOWALSKI**

Field Name	Old Value	New Value	Date
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MARISEL A. HERNANDEZ, Chairwoman

WILLIAM J. KRESSE, Commissioner

JONATHAN T. SWAIN, Commissioner

LANCE GOUGH Executive Director



CHICAGO, ILLINOIS 60602  
(312)269 - 7900  
FAX (312)263 - 3649  
TTY (312)269 - 0027  
WWW.CHICAGOELECTIONS.COM  
E-mail Address: CBOE@CHICAGOELECTIONS.NET

**Histories for 016P501 - JAN KOWALSKI**

Election Date	Party	Voting Method	
---------------	-------	---------------	--

Jan R Kowalski

Cook County Clerk  
Chicago Board of Election Commissioner

# Petition Summary Report

Last Printed  
12/17/2015  
6:47:49 PM

Petition: 2015COEBCC01  
Election: 031516

Objector Name: AUDREY JAYCOX  
Candidate Name: JAN KOWALSKI

Candidate Contact:	Signature Required:	5365
Phone:	Countywide Offices	
Fax:		
Objector Contact: AUDREY JAYCOX	Total Pages:	1355
Phone:	Total Signatures:	13430
Fax:	Total Objections:	10196
	Total Ruled On:	3564
	Total Remaining:	<del>6632</del>
	Total Sustained:	2919
	Total Overruled:	645
	For Review (Candidate):	1779
	For Review (Objector):	637
	Total Valid Signatures:	10511
	Total Unchallenged Sigs:	3234
	5146 Signatures greater than the required minimum	

I acknowledge the completion of the records examination at 12/17/2015 6:47:49 PM

Candidate Representative \_\_\_\_\_  
Objector Representative \_\_\_\_\_  
County / City Representative \_\_\_\_\_

6

Cook County Clerk  
Chicago Board of Election Commissioner

# Petition Summary Report

Last Printed  
12/17/2015  
6:47:49 PM

Petition: 2015COEBCC01  
Election: 031516

Objector Name: AUDREY JAYCOX  
Candidate Name: JAN KOWALSKI

**Candidate Contact:**

Phone:

Fax:

**Objector Contact:**

Phone:

Fax:

AUDREY JAYCOX

**Signature Required:**

5365

**Countywide Offices**

**Total Pages:**

1355

**Total Signatures:**

13430

**Total Objections:**

10196

**Total Ruled On:**

3564

**Total Remaining:**

~~6632~~

**Total Sustained:**

2919

**Total Overruled:**

645

**For Review (Candidate):**

1779

**For Review (Objector):**

637

**Total Valid Signatures:**

10511

**Total Unchallenged Sigs:**

3234

5146 Signatures greater than the required minimum

I acknowledge the completion of the records examination at 12/17/2015 6:47:49 PM

Candidate Representative

Objector Representative

County / City Representative

6

Cook County Clerk  
Chicago Board of Election Commissioner

# Petition Summary Report

Last Printed  
12/18/2015  
6:49:52 PM

Petition: 2015COEBCC01  
Election: 031516

Objector Name: AUDREY JAYCOX  
Candidate Name: JAN KOWALSKI

Candidate Contact:	
Phone:	
Fax:	
Objector Contact:	AUDREY JAYCOX
Phone:	
Fax:	
Signature Required:	5365
Countywide Offices	
Total Pages:	1354
Total Signatures:	13420
Total Objections:	10183
Total Ruled On:	5476
Total Remaining:	4707
Total Sustained:	4585
Total Overruled:	891
For Review (Candidate):	3777
For Review (Objector):	1088
Total Valid Signatures:	8835
Total Unchallenged Sigs:	3237
3470 Signatures greater than the required minimum	

I acknowledge the completion of the records examination at 12/18/2015 6:49:52 PM

Candidate Representative

Objector Representative

County / City Representative

H

Cook County Clerk  
Chicago Board of Election Commissioner

# Petition Summary Report

Last Printed  
12/21/2015  
4:59:43 PM

Petition: 2015COEBCC01  
Election: 031516

Objector Name: AUDREY JAYCOX  
Candidate Name: JAN KOWALSKI

Candidate Contact:	Signature Required:	5365
Phone:	Countywide Offices	
Fax:		
Objector Contact:	Total Pages:	1354
Phone:	Total Signatures:	13420
Fax:	Total Objections:	10174
	Total Ruled On:	8324
	Total Remaining:	1850
	Total Sustained:	7043
	Total Overruled:	1281
	For Review (Candidate):	7350
	For Review (Objector):	3605
	Total Valid Signatures:	6377
	Total Unchallenged Sigs:	3246
	1012 Signatures greater than the required minimum	

I acknowledge the completion of the records examination at 12/21/2015 4:59:43 PM

Candidate Representative

Objector Representative

County / City Representative

Cook County Clerk  
Chicago Board of Election Commissioner

# Petition Summary Report

Last Printed  
12/22/2015  
6:27:06 PM

Petition: 2013COEBCC01  
Election: 031516

Objector Name: AUDREY JAYCOX  
Candidate Name: JAN KOWALSKI

Candidate Contact:

Phone:

Fax:

Objector Contact:

Phone:

Fax:

AUDREY JAYCOX

Signature Required:

5365

Countywide Offices

Total Pages:

1353

Total Signatures:

13414

Total Objections:

10160

Total Ruled On:

10160

Total Remaining:

0

Total Sustained:

8603

Total Overruled:

1557

For Review (Candidate):

9115

For Review (Objector):

5424

Total Valid Signatures:

4811

Total Unchallenged Sigs:

3254

554 Signatures fewer than the required minimum

I acknowledge the completion of the records examination at 12/22/2015 6:27:06 PM

  
Candidate Representative  
  
Objector Representative  
  
County / City Representative



Deborah Moldover &lt;dmoldover@chicagoelectionlaw.com&gt;

**Jaycox v. Kowalski Records Examination Report**

4 messages

**Deborah Moldover** <dmoldover@chicagoelectionlaw.com>

Wed, Dec 23, 2015 at 7:16 AM

To: "Christina Lynch (County Clerk)" &lt;Christina.Lynch@cookcountyil.gov&gt;

Hi Christina,

Has there been a final report issued for the results from the records examination in Jaycox v. Kowalski (15 COEB CC01)? I received a Rule 8 motion from Mike Kasper, who is representing the objector, this morning, but have not yet gotten any word, except the text message of a picture of the end of the night print out from Ms. Kowalski around 7:15 last night.

Thank you so much,

Deborah

**Deborah Moldover****Ross D. Secler & Associates**

dmoldover@chicagoelectionlaw.com

Office: (312) 853-8000

Mobile: (312) 857-8084

Fax: (312) 853-8008

www.chicagoelectionlaw.com

\*\*\*\*\*

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**Christina Lynch (County Clerk)** <Christina.Lynch@cookcountyil.gov>  
To: Deborah Moldover <dmoldover@chicagoelectionlaw.com>

Wed, Dec 23, 2015 at 7:33 AM

Hi Deborah, have to check in with the record exam folks to see if they issued the final report on this one. I was not here at 7:15pm last night. She ended up with 4,811 valid signatures according to the petition summary report I just viewed.

Christina T. Lynch

Staff Attorney

Cook County Clerk, David Orr

69 W. Washington St., Suite 500

Chicago, IL 60602

312.603.6886 direct

K

773.531.3317 mobile  
312.603.9786 fax  
www.cookcountyclerk.com

---

**From:** Deborah Moldover <dmoldover@chicagoelectionlaw.com>  
**Sent:** Wednesday, December 23, 2015 7:16 AM  
**To:** Christina Lynch (County Clerk)  
**Subject:** Jaycox v. Kowalski Records Examination Report

[Quoted text hidden]

---

**Deborah Moldover** <dmoldover@chicagoelectionlaw.com>  
To: "Christina Lynch (County Clerk)" <Christina.Lynch@cookcountyil.gov>

Wed, Dec 23, 2015 at 7:36 AM

That's the number I have on the cover page she sent me a picture of as well. Thank you for look into this.  
[Quoted text hidden]

---

**Deborah Moldover** <dmoldover@chicagoelectionlaw.com>  
To: "Christina Lynch (County Clerk)" <Christina.Lynch@cookcountyil.gov>

Wed, Dec 23, 2015 at 2:53 PM

Hi Christina -

Just wanted to check back in on this - I have Jan working on creating a list of lines we'd like to bring up in a Rule 8 hearing, but it's hard to give her guidance on the timeline if we don't know if what we have is the final report.

Thanks,

Deborah  
[Quoted text hidden]



Deborah Moldover &lt;dmoldover@chicagoelectionlaw.com&gt;

**Emergency Motion - Jaycox v. Kowalski 15 COEB CC01**

4 messages

Deborah Moldover &lt;dmoldover@chicagoelectionlaw.com&gt;

Wed, Dec 23, 2015 at 4:33 PM

To: "Law Office of Christopher J. Agrella" <agrellalaw@comcast.net>, Michael Kasper <mjkasper60@me.com>, electoral.board@cookcountyiil.gov

Candidate files an emergency motion to extend the deadline for Rule 8 Motions. Candidate did not receive confirmation that the print out summary that was presented at the end of the records examination last night was final until 3:45 PM today when Candidate's counsel inquired in person with the County Clerk's Office when she was appearing on a different matter. Candidate's counsel has not received a PDF copy of the records examination summary as of 4:26 PM. In the interest of justice and fairness, Candidate requests that she have until tomorrow at 5 PM to file any Rule 8 Motion(s) in the above case.

Deborah Moldover

-

**Deborah Moldover****Ross D. Secler & Associates**

dmoldover@chicagoelectionlaw.com

Office: (312) 853-8000

Mobile: (312) 857-8084

Fax: (312) 853-8008

www.chicagoelectionlaw.com

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agrellalaw@comcast.net &lt;agrellalaw@comcast.net&gt;

Wed, Dec 23, 2015 at 6:30 PM

To: Michael Kasper <mjkasper60@me.com>, electoral.board@cookcountyiil.gov, Deborah Moldover <dmoldover@chicagoelectionlaw.com>, Christopher Agrella <ca6363@comcast.net>

Mr. Kasper,

Do you have any objection to this request?

The board employees that conducted The Record Examination, to my understanding, hand on each side a copy of the final report at the time the record exam was completed. Please advise that's your position,

Christopher Agrella  
Hearing Officer

Sent from my android device.

[Quoted text hidden]

[Quoted text hidden]

Michael Kasper &lt;mjkasper60@me.com&gt;

Wed, Dec 23, 2015 at 6:57 PM

To: agrellalaw@comcast.net

Cc: electoral.board@cookcountyiil.gov, Deborah Moldover &lt;dmoldover@chicagoelectionlaw.com&gt;, Christopher

Agrella <ca6363@comcast.net>

In this matter, the Objector's watchers were handed a Summary Report at the conclusion of the Records Examination yesterday. That Summary Report shows that the Candidate is 554 signatures below the statutory minimum. I am also told that the Summary Report was provided to both sides watchers at approximately 6:30 p.m. last evening. The Objector filed her Rule 8 Motion this morning.

While I would like to avoid being overly severe to the Candidate, I would also point out that the Candidate's Motion for Extension concedes that her side was provided with the Records Examination Summary Report last evening. Although there may have been some miscommunication on the Candidate's side, an extension of time now, after the deadline has passed, would obviously be prejudicial to my client.

In addition, Rule 8 of the Board's Rules of Procedure provides that the Rule 8 Motion must be filed "within 24 hours after the completion of the examination." Board Rule 8.

In contrast, the Chicago Officers Electoral Board rules provide that in cases before it, a similar Rule 8 Motion must be filed "not later than 5:00 pm on the first business day following completion of the records examination" or "by such other date and time established by the Electoral Board or hearing officer."

The absence of a similar provision in the County Officers Electoral Board leads to the conclusion that the hearing officer lacks authority to deviate from the established deadlines.

For these reasons, I cannot agree to the Candidate's Motion.

Mike Kasper  
[Quoted text hidden]

---

**Law Office of Christopher J. Agrella** <agrellalaw@comcast.net>

Thu, Dec 24, 2015 at 12:22 AM

To: Michael Kasper <mjkasper60@me.com>

Cc: electoral.board@cookcountyil.gov, Deborah Moldover <dmoldover@chicagoelectionlaw.com>, Christopher Agrella <ca6363@comcast.net>, "Christina Lynch (County Clerk)" <Christina.Lynch@cookcountyil.gov>

Counsel,

Enclosed please find my Order relative to the candidate's emergency motion to extend time to file Rule 8 Motion.

Very truly yours,

Christopher J. Agrella

Hearing Officer

---

**From:** Michael Kasper [mailto:mjkasper60@me.com]

**Sent:** Wednesday, December 23, 2015 6:58 PM

**To:** agrellalaw@comcast.net

**Cc:** electoral.board@cookcountyil.gov; Deborah Moldover; Christopher Agrella

**Subject:** Re: Emergency Motion - Jaycox v. Kowalski 15 COEB CC01

[Quoted text hidden]



**Order 15 COEB CC 01.pdf**

309K

**BEFORE THE DULY CONSTITUTED ELECTORAL BOARD FOR THE HEARING  
AND PASSING UPON OBJECTIONS TO THE NOMINATION PAPERS OF  
CANDIDATES FOR THE NOMINATION TO COOK COUNTY RECORDER  
IN COOK COUNTY IN THE STATE OF ILLINOIS**

**AUDREY C. JAYCOX**  
**Petitioner-Objector;**

V.

**JAN KOWALSKI,**  
**Respondent-Candidate.**

**No. 15-COEB-CC01**

**CANDIDATE'S MOTION TO RECONSIDER HEARING OFFICER'S  
ORDER RE: CANDIDATE'S EMERGENCY MOTION TO EXTEND TIME TO FILE  
RULE 8 MOTION;  
CANDIDATE'S RULE 8 MOTION**

**NOW COMES**, Respondent-Candidate, JAN KOWALSKI, hereinafter referred to as “Candidate,” by and through her attorney Deborah Moldover, and pursuant to Rule 8 and Rule 11 of the Rules of Procedure Adopted by the Cook County Officers Electoral Board for the Hearing and Passing Upon of Objections to the Nomination Papers of Candidates for Offices Which Are Coterminous With or Less Than the County of Cook, State of Illinois (hereinafter referred to as “Rules of Procedure”) for a motion to reconsider the Hearing Officer’s Order re: Candidate’s Emergency Motion to Extend Time to File Rule 8 Motion, and for appeal of certain findings and decisions made during the records examination in this matter. In support thereof, Candidate states as follows:

## I. Introduction

1. Candidate received a print out from the results of the records examination at approximately 6:30 PM on December 22, 2015. Candidate was not notified at this time if this report was final, or if the results would be reviewed by a signature expert. Candidate did not

receive, and has yet to receive an electronic copy of this report.

2. Candidate's Counsel inquired via an e-mail sent at 7:16 AM on December 23, 2015 to the Cook County Clerk's Office if the report that Candidate received in paper form the previous evening was final. Candidate's Counsel received an e-mail from the Cook County Clerk's Office at 7:33 AM that they would have to check. Candidate's Counsel did not receive confirmation that the printed report that Candidate had received the previous evening was in fact final until approximately 3:45 PM on December 23, 2015.

3. Candidate filed an Emergency Motion to Extend Time to File Rule 8 Motion via e-mail at 4:33 PM on December, 23, 15. After receiving e-mail arguments from both sides, the Hearing Officer denied Candidate's Emergency Motion.

## II. Rule 11 Motion to Reconsider

4. Courts generally favor candidate eligibility and ballot access. *See Maksym v. Bd. of Election Comm'rs of City of Chicago*, 242 Ill.2d 303, 334 (2011) (Justices Freeman and Burke, specially concurring, citing *McGuire v. Nogaj*, 146 Ill.App.3d 280, 282 (1st Dist. 1986)). It is a substantial right that may not be lightly denied. *Welch v. Johnson*, 147 Ill.2d 40, 56 (1992); *Sullivan v. Cnty. Officers Electoral Bd. of DuPage Cnty.*, 225 Ill.App.3d 691, 693 (2d Dist. 1992); *Nolan v. Cook Cnty. Officers Electoral Bd.*, 329 Ill.App.3d 52, 768 N.E.2d 216, 219 (1st Dist. 2002). Courts have traditionally been very careful when construing language that would result in a restriction of the people's right to endorse and nominate the candidate of their choice. *See Nolan*, 768 N.E.2d at 219. In creating limitations, the state is required to employ the least drastic means to achieve its legitimate goals. *See Lubin v. Panish* 8212 6852, 415 U.S. 709, 716 (1974)

5. Rule 8 of the Rules of Procedure requires that any "Rule 8 Motion" must be filed within 24 hours after the completion of the examination. However, in the instant case, Candidate did not know with certainty that the examination had been completed until approximately 3:45 PM on December 23,

2015.<sup>1</sup> While Objector did file her “Rule 8 Motion” at 6:50 AM on December 23, 2015, there is no requirement that Candidate file with similar speed, only that Candidate file within the time provided for in the rules. Objector would not be unduly prejudiced for Candidate to receive until 3:45 PM on December 24, 2015 to file her Rule 8 Motion, 24 hours after Candidate received confirmation that the report she received, that was in a substantially similar format to previously issued preliminary reports, was in fact final. The interests of justice demand that this Board give due consideration to Candidate’s and the people’s substantial right to select the candidate they choose for nomination.

### III. Rule 8 Motion

6. Candidate has lodged timely objections to certain rulings and decisions made by Board staff during the records examination in this cause, and hereby requests the opportunity to present further evidence and argument in appeal of said rulings at an evidentiary hearing pursuant to Rule 8 of the adopted Rules of Procedure to present.

7. The specific petition signers for whom it is requested this Board give further analysis and consideration are listed in the spreadsheet below. The spreadsheet lists each objection that Candidate requests the Board to reconsider along with the corresponding petition sheet and line numbers, the purported signer’s name and address, an X in the appropriate column or columns designating the basis for each appeal and the corresponding exhibit number. Said letters designating the basis for each appeal correspond to the following descriptions:

- a. “A” means the signer is registered to vote at the address shown opposite their name (and, in many instances, the record examiner erroneously ruled that a completely different, registered person had signed the petition);
- b. “B” means the signature in question the genuine signature of the person who purportedly signed the petition signature sheet;

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<sup>1</sup> As there has been an extensive records examination in this case, a preliminary report has been issued at the end of each day of the records examination. It is unclear from the Rules of Procedure whether Cook County employs a forensic handwriting expert in the same manner as the City of Chicago. It is a reasonable assumption that the report handed to watchers at the end of the records examination that is in substantially the same form as the preliminary reports issued each day will not yet be final.

- c. "C" means the signer's does reside and is he/she registered to vote in the proper election district;
- d. "D" means the signer's address is not missing or incomplete and the objection against same should not have been sustained according to the Board's adopted Ruled of Procedure and the relevant statutes and case law;
- e. "E" means the signer's signature does not appear more than once in the petition sheet;
- f. "F" means the signer did not sign the petition of a different political party;

8. Candidate is requesting certified voter registration records and other documentary and testimonial evidence regarding the petition signers named herein to present to the Board during the evidentiary hearing.

Sheet	Line	A. Not registered	B. Signature not genuine	C. Outside District	D. Incomplete	E. Signed Multiple times	F. Signed for other party	Name	Address	City
11	7	X	X					DAVIS, FRANCISCO M	2247 W MONROE ST	CHICAGO
12	9	X	X					GONZALEZ, JESUS	2856 S MILLARD AVE	CHICAGO
14	1	X	X					BROWN, ANTHONY LEE	8001 S ALBANY AVE	CHICAGO
14	4	X	X					SINGLETON, PHOENIX A	5617 S CALUMET AVE	CHICAGO
14	7	X	X					OLAKOWSKI, LAURA S	2026 W OHIO ST	CHICAGO
15	6	X	X					SOLER, MARGARITA	4321 W PARKER AVE	CHICAGO
15	9	X	X					MONROIG, ANNABEL	5424 W SUNNYSIDE AVE	CHICAGO
16	10	X	X					WATERS, EUGENE	3640 S RHODES AVE	CHICAGO
17	4	X	X					HALL, KEVIN	125 DES PLAINES AVE	FOREST PARK
17	6	X	X					MILLER, MARK JAMES	659 W RANDOLPH	CHICAGO
17	7	X	X					MILLER, MORIAH C	659 W RANDOLPH ST	CHICAGO
18	10	X	X					MUJICIC, MIRZA	5740 N SHERIDAN RD	CHICAGO
19	1	X	X					PLIML, GEORGETTE MARIAN	2502 W AINSLIE ST	CHICAGO
19	7	X	X					BANKS, ROYNELL	2355 E 67TH STREET	CHICAGO
19	10	X	X					RICHARD, WILLIAM	3457 N PACIFIC AVE	CHICAGO
20	3	X	X					BAKER, CHASTEN E	2227 S RIDGEWAY AVE	CHICAGO
20	4	X	X					YURUKOVA STOICHKOVA, SILVIYA V	1208 LOIS AVE	PARK RIDGE
20	6	X	X					SHOOT, LAURA M	6201 W 93RD PL	OAK LAWN

20	9	X	X					WILLIAMS, TIFFANY RENEE	8120 S ESSEX AVE	CHICAGO
20	1 0	X	X					BOLDEN, NICOLE P	3401 W NORTH AVE	CHICAGO
24	7	X	X					WADE, RODNEY E	214 E 71ST ST	CHICAGO
26	4	X	X					RANDOLPH, SANDRA L	1505 FOREST AVE	CALUMET CITY
26	6	X	X					MC ELLIGOTT, ANDREW D	1521 FOREST RD	LA GRANGE PARK
27	4	X	X					MAUTHE, MARY J	429 SHERWOOD RD	LA GRANGE PARK
28	6	X	X					DOMINGUEZ, JOSE A	3336 S JUSTINE ST	CHICAGO
29	9	X	X					AWADALLAH, OTHMAN Y	5859 W 82ND ST	BURBANK
30	6	X	X					JONES, OTIS MAURICE	7237 S TROY ST	CHICAGO
30	8	X	X					CURTIS, JORDAN T W	701 ASH ST	FLOSSMOOR
30	9	X	X					PORTER, LATRINA	8354 S ADA ST	CHICAGO
32	6	X	X					GONZALEZ, MARIA A	4731 S LECLAIRE AVE	CHICAGO
32	8	X	X					FLORES, BRENDA K	1527 S 51ST CT	CICERO
33	1	X	X					PAVLUK, ANDREW J	1938 S HALSTED ST	CHICAGO
33	3	X	X					COWLEY, MANUS J	4142 N KENMORE AVE	CHICAGO
34	4	X	X					ZIECIK, ROBERT	3032 N SHEFFIELD AVE	CHICAGO
34	9	X	X					FLORES-LOPEZ, EVA	4205 S NORMAL AVE	CHICAGO
34	1 0	X	X					TAMER, ASTRID M	2145 W 19TH ST	CHICAGO
35	1	X	X					MARTINEZ, ROBERTO	2040 W CULLERTON ST	CHICAGO
35	6	X	X					DOYLE, MAUREEN E	810 MICHIGAN AVE	EVANSTON
35	8	X	X					KESKE, CARIN S	2331 N WAYNE AVE	CHICAGO
36	8	X	X					BRADFORD, NIKITA S	7243 S MICHIGAN AVE	CHICAGO
37	1	X	X					JOHNSON, PERRY W	7228 S TALMAN AVE	CHICAGO
37	3	X	X					GAUCIN, SANDRA	2659 S HAMLIN AVE	CHICAGO
39	2	X	X					ROGAN, MICHAEL B	9805 S KENTON AVE	OAK LAWN
42	1 0	X	X					HENRY, OLIVIA R	3630 N AVERS AVE	CHICAGO
47	1	X	X					LAWRENCE, DAVID HINTON	1339 W WALTON ST	CHICAGO
61	5	X	X					ADAMS, CAROLE G	4608 FRANKLIN AVE	WESTERN SPRINGS
61	8	X	X					MORRIS, DANIEL J	4900 CENTRAL AVE	WESTERN SPRINGS
81	4	X	X					LAMPKINS, NICOLE R	3939 W 71ST ST	CHICAGO
81	5	X	X					GORDON, SHELLEY L	1230 W 76TH ST	CHICAGO
86	7	X	X					ROWE, DEANNA	39 W 78TH ST	CHICAGO
92	6	X	X					COLEMAN, MICHAEL D	1649 W CHASE AVE GRDN	CHICAGO
92	9	X	X					STATES, ANDRE D	1319 S TROY ST	CHICAGO
93	7	X	X					KRAUS, DANA JOY	2253 W LELAND AVE	CHICAGO
98	4	X	X					ELLISON, JOCKEL E	6112 S SAINT LAWRENCE AVE	CHICAGO

10 0	4	X	X					JOHNSON, MELVIN L	7000 S WABATH	CHICAGO
10 2	4	X	X					JONES, EDDIE C	6622 S DORCHESTER AVE	CHICAGO
10 5	6		X					AUSTIN, CASSANDRA B	6214 S KING DR	CHICAGO
10 5	9		X					JONES, YOLANDA N	6659 S MINERVA AVE	CHICAGO
12 1	8		X					SUTTON, DEBRA	8023 S RHODES AVE	CHICAGO
12 6	2		X					BURKE, LORENZO	847 E 64TH PL	CHICAGO
13 1	7	X	X					JACKSON, ANTIANNA S	6030 S EBERHART	CHICAGO
13 2	1 0	X	X					ALLEN, TIANZA J	9126 S NORMAL AVE	CHICAGO
13 3	6		X					CAMPBELL, CHESTER K	7943 S COLES AVE	CHICAGO
13 3	7	X	X					NICHOLS, ANTHONY	1525 E 67TH PL	CHICAGO
14 0	4		X					BLAKELEY-HATCHER, SHERYL L	6149 S CHAMPLAIN AVE	CHICAGO
14 1	6		X					POWELL, PERCY L	400 E 41ST ST	CHICAGO
14 3	5		X					GRAY, ROBERTO L	6650 S WABASH AVE	CHICAGO
14 3	1 0		X					BECKLEY, JAMES J	6112 S CHAMPLAIN AVE	CHICAGO
14 5	1		X					WALKER, JOEL QUINCY	8537 S MARQUETTE AVE	CHICAGO
14 5	2		X					SPIVEY, DENISE	11346 S WENTWORTH AVE	CHICAGO
14 5	4		X					DANDRIDGE, JENNIFER UNIQUE	2001 S MICHIGAN AVE	CHICAGO
14 8	2		X					BRADFORD, COLONEL	6900 S CRANDON AVE	CHICAGO
14 9	5	X	X					RAMSEY, DEVANTE D	6616 S DREXEL AVE	CHICAGO
14 9	8		X					WOMACK, JOHN A	731 E 60TH ST	CHICAGO
15 3	1 0		X					HOSKINS-BOND, SHIRLEY D	6215 S CHAMPLAIN AVE	CHICAGO
15 7	3		X					RANDLE, EDWARD L	6133 S MICHIGAN AVE	CHICAGO
15 7	8	X						HALL, ROCHELLE	6246 S KING DR	CHICAGO
15 8	4	X						JACKSON, SAM	8244 S PAXTON	CHICAGO
15 8	7	X						COOKS, FREDDIE L	905 E 80TH ST	CHICAGO
15 8	8	X						BLACK, CLARICE	7510 S INGLESIDE AVE	CHICAGO
15 8	1 0	X						DEAN, CANDACE L	6362 S KING DR	CHICAGO
15 9	4	X						BROWN, ROMELL	4238 S CHAMPLAIN	CHICAGO
16 0	2		X					KELLEY, DORIS A	8029 S DOBSON AVE	CHICAGO
16 0	8		X					PAYNE, JAMES R	502 W 46TH ST	CHICAGO

16 1	3		X				JACKSON, VIRGINIA	401 E BOWEN	CHICAGO
16 1	4		X				GARNER, JANICE	7840 S ELLIS AVE	CHICAGO
16 1	6		X				GATES, DARNYECE M	731 E 90TH PL	CHICAGO
16 2	8	X					BEAL, JERMANE L	4510 W ADAMS ST	CHICAGO
16 3	1		X				JOHNSON, ANTONIO R	6425 S LOWE AVE	CHICAGO
16 3	2	X	X				JOHNSON, RICO B	10602 S LAFAYETTE AVE	CHICAGO
16 3	8	X					HOLLAND, VINCENT	8052 S HARVARD AVE	CHICAGO
16 5	3		X				VALDES, MANUEL A	7818 S KARLOV AVE	CHICAGO
16 5	4		X				VALDES, STEVE	7818 S KARLOV AVE	CHICAGO
16 6	1	X					HILL, DOMONIQUE F	1656 N MONITOR AVE	CHICAGO
16 6	3	X					STEWART, DIANA M	7043 S SAINT LAWRENCE	CHICAGO
16 6	4	X					STEWART, GAIL L	7043 S SAINT LAWRENCE	CHICAGO
16 6	5	X					BARNES, DEATRA G	7043 S SAINT LAWRENCE	CHICAGO
16 6	7	X					CLAY, ROBERT C	7041 S SAINT LAWRENCE AVE	CHICAGO
16 6	9		X				GOGGINS, BELINDA ANN	7105 S CHAMPLAIN AVE	CHICAGO
16 9	8		X				BILLUPS, DEBORAH L	7707 S GREEN ST	CHICAGO
17 0	5	X					MALONEY, DENISE	13148 S CORLISS AVE	CHICAGO
17 1	2	X					LAMPKINS, LAJUANA M	813 E MARQUETTE RD	CHICAGO
17 6	7		X				CAMPOS, GERARDO	2850 W CERMAK RD	CHICAGO
17 7	9		X				AVILA, PAUL RAYMOND	2838 W 23RD PL	CHICAGO
18 0	4	X	X				GAVINS, CAITLYNN S L	10439 S HOXIE AVE	CHICAGO
18 1	6		X				MOORE, LENORA A	6936 S DORCHESTER AVE	CHICAGO
18 7	1		X				MCMULLEN, JESSE	101 W 74TH ST	CHICAGO
30 2	1	X	X				ROACH, KATHERINE	1215 S SAWYER	CHICAGO
30 8	6		X				ALLEN, LADELL A	8842 S MAY ST	CHICAGO
30 9	8		X				JOHNSON, DAMIAN PATRICK	1030 N DEARBORN ST	CHICAGO
31 1	5		X				THOMAS, DAVID	6230 S DORCHESTER AVE	CHICAGO
31 1	8	X	X				COCHRAN, RENEE	1415 W 70TH ST	CHICAGO
31 2	2	X	X				ROBERTSON, VIRGINIA C	8257 S INGLESIDE AVE	CHICAGO
31 2	4	X	X				WRIGHT, NICHOLE NATASHA	7901 S PHILLIPS AVE	CHICAGO

31 3	1	X	X					MILLER, JAMES	6845 S EMERALD ST	CHICAGO
31 3	7		X					NELSON, CALINDA	11251 S HOMewood AVE	CHICAGO
31 6	5	X	X					HUDSON, BRIANA C	13261 S SAINT LAWRENCE AVE	CHICAGO
31 6	8		X					DENNIS, LESHAY M	11235 S KING DR	CHICAGO
32 7	8		X					HAWKINS, BARBARA J	6218 S INDIANA AVE	CHICAGO
32 7	9		X					WILLIAMS, MARISSA G	6124 S KING DR	CHICAGO
32 8	6		X					WALKER, JOHN H	853 E 82ND ST	CHICAGO
32 9	9		X					BANKS, TONIA D	6348 S WINCHESTER AVE	CHICAGO
33 0	1	X						EPps, ROBERT L	7622 S COLFAX AVE	CHICAGO
33 1	1		X					BRIGGS, CRYSTAL R	7739 EBERHART AVE	CHICAGO
33 5	2		X					COX, DENNIS	2219 E 68TH ST	CHICAGO
33 5	6		X					WATSON, ANGELA R	7808 S SOUTH SHORE DR	CHICAGO
33 7	6	X	X					WRIGHT, KEVIN	8153 S VERNON AVE	CHICAGO
33 7	8	X						WHITEHEAD, GREGORY MIDDLE	407 E 82ND STREET	CHICAGO
34 1	7	X	X					ENAU, MICHELLE C	2518 N KEDZIE AVE	CHICAGO
34 3	4	X	X					KANE, EMILIE R	2530 N SAWYER AVE	CHICAGO
35 2	8		X					ARZUAGA, ALFREDO	915 W WILSON AVE	CHICAGO
35 7	6	X						BINION, MARTIN JOEL	718 E 50TH PL	CHICAGO
35 9	7			X				HARRIS, DARNELL	5959 S INDIANA AVE	CHICAGO
37 3	1 0		X					SPRATT, BOBBIE C	1961 E 72ND ST	CHICAGO
38 1	1		X					HARRIS, ARKISHA S	1542 E 67TH PL	CHICAGO
38 9	1		X					HOOKEr, KATHY DAYE	808 E 61ST ST	CHICAGO
38 9	5	X	X					MOORE, SAMMIE L	641 E 71ST ST	CHICAGO
39 0	3	X	X					JOHNSON, GINA M	641 E 71ST ST	CHICAGO
39 1	9	X	X					SUTHERLIN, TONESHA	5505 W CORCORAN PL	CHICAGO
39 1	1 0	X	X					HENRY, IVY L	3116 W 64TH ST	CHICAGO
39 3	1	X	X					MATTHEWS, JESSICA	1720 W 99TH ST	CHICAGO
39 4	4	X	X					BROWN, DEDRE	6942 S CORNELL AVE	CHICAGO
39 6	7					X		WASHINGTON, KAREN	8249 S MARYLAND AVE	CHICAGO
39 7	5	X	X					BERRY, SANDRA R	6246 S KING DR	CHICAGO

39 7	6	X	X					THOMAS, ANDREA M	6204 S KING DR	CHICAGO
39 7	7	X						EDDINGTON, WAYNE	128 E 42ND ST	CHICAGO
40 3	2		X					JONES, JOYCE H	7622 S HOYNE AVE	CHICAGO
40 7	2		X					SMITH, CHARLOTTE A	315 E 55TH PL	CHICAGO
41 0	5		X					THORNTON, DELORES D	1200 E 78TH ST	CHICAGO
41 4	5		X					LABON, MARGARET JEAN	1310 E 74TH ST	CHICAGO
41 5	2		X					WILLIAMS, ANTHONY TONY	8537 SOUTH SAINT LAWRENCE AVE	CHICAGO
41 7	1 0		X					NAYLOR, PAMALA ANN	1624 E 85TH ST	CHICAGO
41 9	4		X					MCKINNEY, TYRAN L	441 W 104TH ST	CHICAGO
41 9	7		X					LEWIS, CEDRIC C	9141 S PHILLIPS AVE	CHICAGO
41 9	9		X					PULLIAM, JAMIERE T	8907 S UNIVERSITY AVE	CHICAGO
42 1	6		X					JEFFERSON, JACQUELINE	12243 S RACINE AVE	CHICAGO
42 3	9		X					JAMES, WYNONA	7003 S HARPER AVE	CHICAGO
42 4	3		X					GOODEN, KIMBERLY	9941 S PRINCETON AVE	CHICAGO
42 5	7		X					KING, RITA MARIA	9004 S DAUPHIN AVE	CHICAGO
42 6	3		X					JOHNSON, ROBERT DEMALLE	6728 S EAST END AVE	CHICAGO
43 0	1		X					ROBERTS, GERALD M	12039 S UNION AVE	CHICAGO
43 0	3		X					HEMPHILL, AERIAL LL	6413 OAKLEY AVE	CHICAGO
43 1	7		X					JOHNSON, QUENTIN M	2645 W 85TH PL	CHICAGO
43 3	2		X					ADKINS, WILLIAM WAYNE	7331 S SANGAMON ST	CHICAGO
43 3	6		X					WALLACE, VIVIAN M	1244 W 74TH ST	CHICAGO
43 8	2					X		LEWIS, JUNE P	2458 E 72ND ST	CHICAGO
43 8	3		X					PATTON, ROBERT V	2458 3 72ND ST	CHICAGO
44 6	2		X					MARTIN, SHONTIVA M	1433 E 66TH PL	CHICAGO
44 6	4		X					MEEKS, NORMA JEAN	6856 S DORCHESTER AVE	CHICAGO
44 6	1 0		X					LITTRICE, MONIQUE Y	6816 S DORCHESTER AVE	CHICAGO
44 7	8		X					PEGUES, JANNIFER	10436 S VERNON AVE	CHICAGO
44 7	9		X					PEGUES, BRITTANY JANAC	10436 S VERNON AVE	CHICAGO
44 9	3	X						DENSON, WILLIAM W	8050 S OGLESBY AVE	CHICAGO
44 9	5	X						SMITH, BIANCA	8552 S KINGSTON AVE	CHICAGO

45 4	5		X					WEATHERS, NATALIE	6246 S PARK SHORE EAST	CHICAGO
45 4	9	X	X					THOMPSON, ANGEL	9704 S PRAIRIE AVE	CHICAGO
45 9	4	X	X					MINES, CHRISTAN	1536 3 74TH ST	CHICAGO
45 9	8	X	X					THIGPEN, RENEECE	1517 3 62ND ST	CHICAGO
46 1	4		X					ROLAND, NICHOLAS O.D	1506 E 67TH ST	CHICAGO
46 1	8	X	X					MADKINS, TARONDA	8623 S KINGSTON AVE	CHICAGO
46 2	5	X	X					SILAS, TRYPHENA	1506 E 67TH ST	CHICAGO
46 3	7		X					JOHNSON, BRUCE D	6726 S CHAPPEL AVE	CHICAGO
46 9	4		X					MCAFEE, FELIX W	6749 S OGLESBY AVE	CHICAGO
47 0	9	X						MCDONALD, DOMINIQUE R	6749 S RIDGELAND AVE	CHICAGO
48 7	5		X					CALVERT, JAMES	3605 W 18TH ST	CHICAGO
51 0	4	X						SMITH, TERRANCE C	6117 S VERNON AVE	CHICAGO
51 0	5		X					WILLIAMS, JEROME	6729 S SAINT LAWRENCE AVE	CHICAGO
51 1	9	X						MAGEE, STEPHEN B	527 W 14TH PL	CHICAGO
51 2	6	X						GAVINS, MADELINE F	10439 S HOXIE AVE	CHICAGO
51 5	3		X					HOLLIMAN, MICHAEL A	1423 E 66TH PL	CHICAGO
51 8	9	X						WALLS, JAMAL	6629 S DREXEL AVE	CHICAGO
51 8	1	X						GRANT, CORTEZ D	6411 S MARSHFIELD AVE	CHICAGO
52 0	2		X					JACKSON, DARIUS D	2539 E 77TH ST	CHICAGO
52 1	6		X					WOODS, MARY E	6731 S JEFFERY BLVD	CHICAGO
52 1	8	X	X					ISAAC, SHARON DENISE	7838 S ABERDEEN ST	CHICAGO
52 2	6		X					HOLLEY, LOLA B	6121 S VERNON AVE	CHICAGO
52 3	8		X					WALLS, SHARON R	6244 S KING DR	CHICAGO
52 5	1	X						WARD, TAWANA	6136 S KIMBARK AVE	CHICAGO
52 6	1	X						EVANS, LAJUANDA	6600 S PRAIRIE AVE	CHICAGO
52 6	6	X	X					GRIFFIN, SANDRA A	6117 S VERNON AVE	CHICAGO
52 7	3	X						DRAKE, DEONE	8216 S VERNON AVE	CHICAGO
52 8	1	X						TRAYLOR, PAMELA V	6921 S CRANDON AVE	CHICAGO
53 2	9		X					NEWTON, LAKESHA	1643 E 67TH ST	CHICAGO
53 2	1		X					BUSCH-MARTIN, SHARDAE ELISE	6746 S EAST END AVE	CHICAGO

53 3	2		X				MARTIN-HARDEMAN, TINOSHA D	6749 S RIDGELAND AVE	CHICAGO
53 3	4		X				LUSTER, DARRON	21 E 77TH ST	CHICAGO
53 3	6		X				HUGHES, GEORGE S	7123 S DREXEL AVE	CHICAGO
53 5	4	X					HAYES, MICHAEL DAVID	6117 S EVANS AVE	CHICAGO
53 6	2	X					PERKINS, VELMA A	1465 E 66TH PL	CHICAGO
53 8	2	X					WOODARD, LATONYA	6720 S CORNELL AVE	CHICAGO
53 8	3	X					SIMS, ALVERA	4812 S KOLIN AVE	CHICAGO
53 9	2		X				SMITH, MARVIN D	8100 S ESSEX AVE	CHICAGO
53 9	5		X				ROBINSON, SANDRA L	4436 S LAVERGNE AVE	CHICAGO
57 1	2		X				PARKER, HASHEEM J	7940 S GREENWOOD AVE	CHICAGO
57 2	1 0	X	X				EDMOND, TAMMY L	2402 E 77TH ST	CHICAGO
57 3	7		X				PEARSON, DAVID	11537 S S PERRY AVE	CHICAGO
58 0	7		X				CURRY, MICHAEL C	4947 S MICHIGAN AVE	CHICAGO
58 1	1 0		X				WEST, MAURICE	945 W 117TH ST	CHICAGO
58 3	4		X				ORANGE, RAY ANTHONY	8034 S PERRY AVE	CHICAGO
58 4	9	X					MAYBERRY, LOUIS	60 E 36TH PL	CHICAGO
58 5	9	X	X				BROWN, LE ANTHONY D	6424 S KING DR	CHICAGO
58 6	1	X	X				DAVIS, ROSALIND D	432 E 47TH ST	CHICAGO
58 8	8		X				DAVIS, DESHAWN J	22 E 119TH PL	CHICAGO
58 8	1 0	X					WILMINGTON, TRACEY RENEE	4718 S ELLIS AVE	CHICAGO
59 0	5		X				BELL, LESLIE J	1420 E 67TH PL	CHICAGO
59 0	6	X					TAYLOR, EDDIE JAMON	1420 E 67TH PL	CHICAGO
59 6	1	X					WILSON, SAMANTHA MARIE	6812 S DANTE AVE	CHICAGO
59 7	3	X					WILLIAMS, SEDGWICK	6223 W WABANSIA AVE	CHICAGO
59 7	8		X				WILSON, MICHAEL L	1735 E 67TH ST	CHICAGO
59 8	1 0	X	X				JOHNSON, ANDREW J	6237 S EBERHART AVE	CHICAGO
59 9	1	X					CHAPEL, ANDREA	6746 S EAST END AVE	CHICAGO
59 9	8	X					SCOTT, TRAVIS	3060 E 79TH ST	CHICAGO
60 0	8	X	X				RINGSWALD, RICHARD A	4314 S WABASH AVE	CHICAGO
60 4	2		X				THOMPSON-TUCKER, ANNICIA D	8210 S JEFFERY BLVD	CHICAGO

60 4	6		X					EASTERLING, AUBREY A	8135 S VERNON AVE	CHICAGO
60 4	9	X	X					HINES, MATTIE M	8349 S DREXEL AVE	CHICAGO
60 5	2		X					DIXON, SAUNDRA G	9343 S LASALLE ST	CHICAGO
60 5 0	1	X	X					PINKNEY, MIKELA M	1627 N LAWNSDALE AVE	CHICAGO
60 6	3	X	X					BLACK, DARNELL	7208 S CORNELL AVE	CHICAGO
60 6	5		X					RIDDLE, ALBERT J	6734 S PAXTON AVE	CHICAGO
60 6	6	X						WELLS, ROMMIE L	6852 S JEFFERY BLVD	CHICAGO
60 6	8		X					WILLIAMS, PATRICK	6819 S RIDGELAND AVE	CHICAGO
60 7	1	X	X					CLARK, SHERRY K	37 W 110TH ST	CHICAGO
60 7	2	X	X					JONES, ANGELA	10756 S WENTWORTH AVE	CHICAGO
60 7	3	X	X					MOORE, SHANAE T	1231 S EMERALD ST	CHICAGO
61 1	9		X					THORNTON, HERMAN	7505 S CALUMET AVE	CHICAGO
61 2	7		X					THIGPEN, NOBLE RICHARD	7717 S CALUMET AVE	CHICAGO
61 2	8		X					WILLIAMS, TERRI ANN	7717 S CALUMET AVE	CHICAGO
62 7	2		X					ANDERSON, JOHNNIE M	6360 S MINERVA AVE	CHICAGO
62 7	3		X					ANDERSON, BELINDA S	1505 E 67TH PL	CHICAGO
62 7	4		X					CARIDINE, ARTHUR	1520 E 69TH ST	CHICAGO
62 7	5		X					CARIDINE, ROSIE LEE	1520 E 69TH ST	CHICAGO
62 7	8		X					DAVIS, ROVONDO	6838 S HARPER AVE	CHICAGO
62 7	9	X	X					BLANKS, GINA R	6822 S CLYDE AVE	CHICAGO
62 9	1		X					SINGLETARY, TRINA ANN	7757 S PEORIA ST	CHICAGO
62 9	5	X	X					BATTLE, BOBBY LEE	5724 S PRINCETON AVE	CHICAGO
63 0	1	X	X					COLLINS, CHRISTOPHER J	2638 W CORTLAND ST	CHICAGO
63 0	2	X	X					BOYLAND, ANDREW	4626 N MAGNOLIA AVE	CHICAGO
63 0 0	1	X	X					SMITH, EBONY	9712 S AVENUE M	CHICAGO
63 1	1	X						JAMES, GLORIA J	1053 N LAVERGNE AVE	CHICAGO
63 4	1		X					WILLIS, SYEDA E	6735 S CHAPPEL AVE	CHICAGO
63 4	2	X						MILLS, JAMES CAREL	6218 S EVANS AVE	CHICAGO
63 9	6		X					JOHNSON, TERRELL	6809 S WOOD ST	CHICAGO
64 0	9		X					PHELPS, JULIUS J	1701 W LAKE ST	CHICAGO

64 1	6		X					GARDNER, MARVIN L	6935 S KING DR	CHICAGO
64 5	9		X					WARLICK, DELRIDGE C	6842 S PAXTON AVE	CHICAGO
64 8	9		X					WALKER, DOMINIQUE S	8005 S SOUTH SHORE DR	CHICAGO
64 8	1 0		X					BIRGANS, ANGELA	7855 S ESCANABA AVE	CHICAGO
64 9	2	X	X					HOLLIS, DEANTRA	1538 E 67TH PL	CHICAGO
64 9	3	X	X					TURNER, DIXON L	6717 S CLYDE AVE	CHICAGO
64 9	7	X	X					MELTON, ROBERT F	4755 S INDIANA AVE	CHICAGO
64 9	8		X					WORD, ARAYA LANETTE	6336 S EBERHART AVE	CHICAGO
65 0	3	X	X					HAYES, MICHAEL DAVID	6117 S EVANS AVE	CHICAGO
65 0	7	X	X					MERNIC, EMINA	6133 N KIMBALL AVE	CHICAGO
65 1	3	X	X					HARRISON, LEONARD S	6150 S DAMEN AVE	CHICAGO
65 2	9	X	X					HAYES, MICHAEL DAVID	6117 S EVANS AVE	CHICAGO
65 3	1	X	X					KNOWLES, DIANE E	1520 E 68TH ST	CHICAGO
65 4	6	X	X					BLAND, ANDRE LASALLE	217 E 68TH ST	CHICAGO
65 5	1		X					COLLINS, BRENDA LEE	7109 S EBERHART AVE	CHICAGO
65 5	5		X					DAWKINS, IRIS	7257 S YATES AVE	CHICAGO
65 6	1		X					SECSON, THOMAS L	1333 W NORTH SHORE AVE	CHICAGO
65 6	5		X					TOLLIVER, MARSLEA D	3510 S RHODES AVE	CHICAGO
65 7	1 0	X	X					SIVELS, ANDREA R	7214 S PEORIA ST	CHICAGO
65 8	2	X	X					JOHNSON, DEBRA	9300 S HALSTED ST	CHICAGO
65 8	9	X	X					HOWARD, RUBEN	6523 X S LOWE AVE	CHICAGO
66 0	7		X					SANDERS, DORRIE RENEE	2727 S INDIANA AVE	CHICAGO
66 2	5		X					GORDON, YOLANDA	8030 S LASALLE ST	CHICAGO
66 3	2	X	X					HANDY, EMMANUEL J	7404 S SOUTH SHORE DR	CHICAGO
66 5	8		X					WILCHER, GRACE J	7952 S MARQUETTE VE	CHICAGO
66 6	2		X					WHITE, ANDREA D	4416 S UNIVERSITY AVE	CHICAGO
66 6	1 0	X	X					JOHNSON, ANNIE	12241 S EMERALD ST	CHICAGO
66 7	1		X					BARROIS, LENNIS M	10206 S HOXIE AVE	CHICAGO
66 9	7		X					SCULLARK, LASHUN D	1859 E 71ST ST	CHICAGO
67 3	1	X	X					WILLIAMS, TRACY JEAN	6705 S MICHIGAN AVE	CHICAGO

67 5	9	X	X					CROWDER, THEODORE HOUSTON	225 E MARQUETTE RD	CHICAGO
67 6	2	X						BROOMFIELD, DARIAN J	539 N HARDING AVE	CHICAGO
67 6 0	1	X	X					SMALLWOOD, THERESA	4821 N CENTRAL PARK AVE	CHICAGO
67 9	5		X					WALKER, ARTHUR K	1632 N HUMBOLDT BLVD	CHICAGO
67 9	6	X						WALTON, EMELDA	6912 S LAFLIN ST	CHICAGO
67 9	8	X						WALTON, BRUCE	6917 S LAFLIN ST	CHICAGO
68 0	7	X	X					MOSS, VYNA M	7925 S EVANS AVE	CHICAGO
68 1	4	X						FLEMING, JEROME	103 W 112TH ST	CHICAGO
68 2	6	X	X					WRIGHT, CLARENCE J	1727 E 83RD ST	CHICAGO
68 4	5	X	X					WILLIAMS, SAMONE	6052 S WOLCOTT AVE	CHICAGO
68 5	5	X	X					JOHNSON, STANLEY L	2225 E 70TH ST	CHICAGO
68 5	6	X						ELAM, JACK	7270 S SOUTH SHORE DR	CHICAGO
68 8	1	X						MCDUFFY, YVONNE T	9202 S UNIVERSITY AVE	CHICAGO
68 8	2		X					HEAD, JEROME A	6811 S JEFFERY BLVD	CHICAGO
68 9	8		X					LEWIS, TARNESHA T	5700 S INDIANA AVE	CHICAGO
69 4	1		X					ZAVALA, FREDDY	3755 W 57TH PL	CHICAGO
69 5	4	X	X					WILSON, ATTALLAH ATIA	7553 S YATES AVE	CHICAGO
69 5	6		X					DAVIS, MARIAH S	8143 S BENNETT AVE	CHICAGO
69 8	9		X					MCRUFFUS, MICHELLE D	10242 S NORMAL AVE	CHICAGO
70 1	7	X	X					WATSON, ANGELA R	7408 S SOUTHSHORE DR 114	CHICAGO
70 1	8		X					THOMPSON, DENISE A	1742 E 72ND ST 3	CHICAGO
70 2	5		X					WINTERS, SHIRLIE	3711 S VINCENNES AVE 412	CHICAGO
70 2	7	X	X					LOFTON, KIMBERLY A	7536 S EAST END AVE	CHICAGO
70 6	4		X					ORTIZ, NANCY	6211 S VERNON AVE	CHICAGO
70 6	8		X					TOWNSEND, HATTIE L	9621 S BRENNAN AVE	CHICAGO
70 7	4		X					SULLIVAN, RAY D	9832S MANISTEE AVE	CHICAGO
70 9	8	X						JAMES, CHARLES E	661 W 117TH PL	CHICAGO
71 0	4		X					LITTLE, LEONA	8008 S RHODESAVE	CHICAGO
71 0	7		X					KING, SHERI D	661 W 117TH PL H	CHICAGO
71 0	1 0		X					LOCKETT, TOMMY	7039 S SANGAMON ST	CHICAGO

71 3	2		X					RAINES, RALPH O	11351 S MAY ST	CHICAGO
71 8	4		X					LEWIS, VIVIAN R	5940 S PRAIRIE AVE 4	CHICAGO
72 2	7		X					SIMMONS, DONALD L	6100 S CHAMPLAIN AVE 3F	CHICAGO
72 3	4		X					JONES, JAMES E	6155 S EBERHART AVE APT 3B	CHICAGO
72 4	5		X					PLEASANT, JASMINE L	1639 E 67TH ST 7-J	CHICAGO
72 6	3		X					SHIELDS, JEREMIAH D	6205 S KIMBARK AVE 3N	CHICAGO
72 7	3		X					COLLINS, MARY B	6714 S BLACKSTONE AVE 3	CHICAGO
72 7	4		X					FINLEY, MICHAEL C	6714 S BLACKSTONE AVE 3	CHICAGO
72 7	1 0		X					WALKER, AMY	6001 S VERNON AVE 101	CHICAGO
72 8	6		X					HARRIS, DARNELL	5959 S INDIANA AVE 306	CHICAGO
72 9	9		X					JACKSON, TIFFANY L	6244 S KING DR 303	CHICAGO
73 1	6		X					FITZGERALD, ZACKIA CARITA	3251 W MAYPOLE AVE B1	CHICAGO
73 2	6		X					THURMOND, SONJA A	6231 S KIMBARK AVE	CHICAGO
73 9	6		X					MURRAY, LANNY	9511 S MERRION AVE	CHICAGO
74 2	6		X					RODRIGUEZ, MIRELLA	2719 S HAMLIN AVE 2	CHICAGO
74 3	5		X					STEPS, RENAE	7320 S PHILLIPS AVE 3E	CHICAGO
74 3	8		X					KENDALL, DESIREE	7803 S CORNELL AVE 1	CHICAGO
74 3	1 0		X					BLACKWELL, CVITA MARIA	1749 E 72ND PL 2	CHICAGO
74 4	3		X					EWELL, RAYMOND A	52 W 78TH ST	CHICAGO
74 4	4		X					BELL, DESMOND E	8216 S VERNON AVE 1FL	CHICAGO
74 4	5		X					HOWARD, TERRENCE L	824 E 53RD ST	CHICAGO
74 5	4	X						COLEMAN, BOBBIE J	8650 S ELIZABETH ST 2B	CHICAGO
74 5	7		X					WASHINGTON, LETICIA D	1140 E 81ST PL 2W	CHICAGO
74 5	9	X						COCHRAN, DAWN M	10327 S FOREST AVE	CHICAGO
74 6	2		X					PETTY, SHANEQUE MONIQUE	10236 S YALE	CHICAGO
74 6	6		X					STEWART, SCOTT KEVIN	1046 E 100TH PL	CHICAGO
74 7	4		X					LEE, ALBERT A	9717 S DOBSON AVE	CHICAGO
74 7	9	X						LEWIS, GENEVIEVE O	6732 S CHAPPEL AVE 1C	CHICAGO
74 9	8		X					BUTTELL, JOYCE	2710 E 83RD ST 3A	CHICAGO
75 0	1		X					RHODES, RICKEY J	6953 S MERRILL AVE B1	CHICAGO

75 3	1 0		X					CATHEY, JACKIE MARIE	115 E 68TH ST 2A	CHICAGO
75 4	7	X						GILMORE, KAREN	2020 W 79TH PL	CHICAGO
75 5	6	X						RIVERS, DOROTHY	1546 W 55THPL 2FL	CHICAGO
75 6	9	X						WILLIAMS, ALMA J	902 W MARGATE TER UN-38	CHICAGO
75 8	1		X					MILLER, RONNIKA R	408 E 72ND ST 2FL	CHICAGO
76 0	3		X					THOMAS, RUBINA	6248 W ADDISON ST 2	ISON ST 2F
76 1	8		X					JHACKSON, DEMIDA M	9405 S LOOMIS ST	CHICAGO
76 2	1 0			X				SWING, MARIA A	7102 S JEFFERY BLVD	CHICAGO
76 3	5	X						GIBSON, EDWARD E	8533 S EUCLID AVE	CHICAGO
76 7	2		X					BROWN, BERNARD ZACHARY	7047 S MERRILL AVE 406	CHICAGO
76 8	4	X	X					BOBO, IZAAH D	10844 S INDIANA AVE	CHICAGO
76 9	9	X						WINN, GREGORY	7926 S LOWE AVE	CHICAGO
76 9 0	1 0		X					HUSSEY, JABAR D	7211 S CONSTANCE AVE	CHICAGO
77 1	4		X					WILLIAMS, CARNELL N	2358 E 70TH PL 103	CHICAGO
77 2	2		X					CATHRON-DIX, LOUISE J	2124 E 69TH ST 3FL	CHICAGO
77 3	3		X					TRUITT-BATTEAST, SHERYL	8104 S COLFAX AVE	CHICAGO
77 3	6	X						MARZETTE, DANNY	7443 S JEFFERY BLVD #IN	CHICAGO
78 2	8		X					NORTHINGTON, SHEILA	6812 S CORNELL AVE 2S	CHICAGO
78 6	2		X					BURKS, DENISE R	1641 E 67TH ST	CHICAGO
78 6	4		X					SCOTT, BEVERLY	1516 E 70TH ST	CHICAGO
78 7	3		X					MONTGOMERY, MALLORY M	1423 W 80TH ST 1	CHICAGO
79 4	1		X					STANLEY, NAAMAN M	7912 S PRAIRIE AVE	CHICAGO
79 5	9		X					MCINTOSH, BREANNA M	4361 S PRINCETON AVE	CHICAGO
79 6	1		X					BERRY, ALONZO D	1137 E 79TH PL 3	CHICAGO
79 6 0	1 0		X					JACKSON, ETHEL JEAN	8429 S BRANDON AVE	CHICAGO
79 7	7		X					EVANS, NATALYNN	3632 S PARNELL AVE 2F	CHICAGO
79 8	6		X					WILLIAMS, GWENDOLYN	7642 S LANGLEY AVE 2	CHICAGO
80 1	5		X					EPPS, DORIS E	3001 E 83RD ST	CHICAGO
80 2	5	X	X					LIMEHOUSE, ANDRE	124 W 108TH PL	CHICAGO
80 9	1 0		X					YOUNG, KEISHUNDRA R	1754 N LONG AVE	CHICAGO

81 0	2		X					BELL, ADDIE MARIE	2931 S FEDERAL ST	CHICAGO
81 6	3		X					STEWART, TASHA T	6832 S CAMPBELL AVE	CHICAGO
82 0	2		X					WELCH, TIFFANY M	6422 S KING DR	CHICAGO
82 0	3		X					POORE, MARQUITA S	1139 W 107TH ST	CHICAGO
82 1 0	1 0		X					WILLIAMS, GRETTA	3720 S DEARBORN ST	CHICAGO
82 2	3		X					MCCOY, TEANIKA AISHA	6641 S DREXEL AVE	CHICAGO
82 5	8		X					ROBISON, MICHAEL T	7412 S BLACKSTONE AVE	CHICAGO
82 6	5		X					SYKES, LARRY	7554 S EBERHART AVE	CHICAGO
82 8	3		X					WILSON, STEVE	1448E 75TH ST	CHICAGO
82 9	2		X					CLAY, ALBERT	405 S BLACKSTONE AVE	CHICAGO
82 9	3		X					CADE, CYNTHIA G	6832 S MERRILL AVE	CHICAGO
82 9	4		X					HUDSON, AL WHIT	1637 E 72ND ST	CHICAGO
82 9	5		X					JACKSON, LAJUAN D	4800 S CALUMET AVE	CHICAGO
82 9	7		X					PORTER, DARRYL	7300 S BLACKSTONE AVE	CHICAGO
83 0	3		X					MORRISON, KEVIN	7624 S RIDGELAND AVE	CHICAGO
83 1	2		X					HUNTER, GERALD G	1649 E 67TH ST	CHICAGO
83 5	5	X	X					COLLINS, MICHAEL	7341 S UNIVERSITY AVE	CHICAGO
83 6	7		X					FINLEY, MICHAEL C	6714 S BLACKSTONE AVE	CHICAGO
84 0	9		X					POORE, JOAN	8308 S INGLESIDE AVE	CHICAGO
84 0	1 0		X					OWENS, STEPHANIE T	1515 E 74TH PL	CHICAGO
84 1	7		X					LEFLORE, LEVESTER	7436 S EAST END AVE	CHICAGO
84 3	4		X					PEARSON, TIFFANY	107 W 110TH ST	CHICAGO
84 3	7		X					HUNTER, MAUSHEA R	9837 S MARYLAND AVE	CHICAGO
84 5	3		X					SMITH, LARRY D ARTHUR	159 E 111TH ST	CHICAGO
84 6	2		X					SMITH, LARRY D ARTHUR	159 E 111TH ST	CHICAGO
84 9 0	1 0		X					BAILEY, HENRY EARL	212 W 112TH PL	CHICAGO
85 0	3		X					BENNETT, WILLIAM EDWARD	6720 S CORNELL AVE	CHICAGO
85 0	6		X					COLEMAN, DORIS A	133 E MARQUETTE RD	CHICAGO
85 1	5		X					BELL, GREGORY THOMAS	333 E 55TH PL	CHICAGO
85 2	5		X					JINADU, MARY J	6810 S EAST END AVE	CHICAGO

85 5	5		X					WALKER, DEANNE ELEANORA	7110 S TROY ST	CHICAGO
85 8	7		X					TSAOUSSS, PATRICIA	6347 N LEGETT AVE	CHICAGO
86 0	1		X					COOPER, DOROTHY M	1528 E 67TH PL	CHICAGO
86 1	3		X					OJEDA, JAMES G	8949 S EXCHANGE AVE	CHICAGO
86 2	4		X					OUTLAND, RHONDA J	7701 S KINGSTON AVE	CHICAGO
86 2	6		X					DUNN, LATOYA L	4852 S VINCENNES AVE	CHICAGO
86 3	8		X					TUCKER, SHAQUILLE	5037 W MONROE ST	CHICAGO
86 5	7		X					REAP, KEITH A	7300 S SOUTH SHORE DR	CHICAGO
87 1	4		X					FRAZIER, DERRICK L	6348 S RHODES AVE	CHICAGO
87 4	2		X					BENTON, FRANCES L	5042 S CALUMET AVE	CHICAGO
88 2	2		X					HARRIS, JAMES A	7942 S ELIZABETH ST	CHICAGO
88 2	3		X					BOWMAN-PATTERSON, MARLENE	8324 S PAXTON AVE	CHICAGO
88 4	3		X					IVEY, NEDRIA	11719 S LOWE AVE	CHICAGO
88 4	5		X					MYLES, ALICIA L	818 W VERMONT AVE	CHICAGO
88 4	6		X					HAYES, KANISHA R	907 E 92ND PL	CHICAGO
88 4	8		X					CARTER, QUINDALE MAREL	10130 S ABERDEEN ST	CHICAGO
88 5	2		X					BAKER, BERTRAM J	6644 S JUSTINE ST	CHICAGO
88 6	5		X					LEWIS, ADDISON E	1949 W PATTERSON AVE	CHICAGO
88 9	3		X					MATHIS, ANTONIO D	5208 W WASHINGTON BLVD	CHICAGO
89 2	5		X					VALLEJO, RUDY	10912 S BUFFALO AVE	CHICAGO
89 4	5		X					MANSHECK, BRITTANY E	4323 S DEARBORN ST	CHICAGO
89 6	1		X					PUGH, CAROL A	9432 S THROOP ST	CHICAGO
89 6	9	X						BEAL, JERMAINE L	4510 W ADAMS ST	CHICAGO
89 6	1 0		X					BUSH, BRENDA	7446 S KING DR	CHICAGO
89 7	2	X	X					JONES, ARMENTRA	4401 S MICHIGAN AVENUE	CHICAGO
89 7	8		X					THOMAS, ANGEL LAJOI	349 E 45TH ST	CHICAGO
90 0	3	X						ROBINSON, SHELBY CARRIE	4914 S CORNELL AVE	CHICAGO
90 0	5					X		MYLES, DONTAYE D	412 W 56TH ST	CHICAGO
90 0	7		X					TATE, SEDENA M	3601 S LAKE PARK AVE	CHICAGO
90 1	1 0		X					GOSA-BROWN, KRISANDRA	2647 W 86TH PL	CHICAGO

90 4	1		X					REESE, TINA M	5000 S INDIANA AVE	CHICAGO
90 4	2		X					ADAMS, RORY LEONARD	11247 S VERNON AVE	CHICAGO
90 4	8		X					SMITH, EUGENE R	6246 S KING DR	CHICAGO
90 5	3		X					MITCHELL, J C	218 W 93RD ST	CHICAGO
90 5	5		X					COURTNEY, CLEMON	1521 S WABASH AVE	CHICAGO
90 5	6		X					LANE, AYUNNA MYANN	4432 S STTE ST	CHICAGO
90 8	3		X					CURRY, TAMISHAE LASHUN	6752 S WOLCOTT AVE	CHICAGO
90 8	6	X	X					ALLEN, SAMANTHA TAMEKA	11023 S VERNON AVE	CHICAGO
90 9	3		X					SALTER, HOMBRELA S	1638 S DRAKE AVE	CHICAGO
90 9	4		X					MARTINEZ, BIANKA ISABELLA	1525 S SANGAMON ST	CHICAGO
90 9	8		X					GUNTY, JOSHUA MARCUS	4929 S CAMPBELL AVE	CHICAGO
91 3	6	X						MCCLELLAN, KEVIN EARL	5817 S WABASH AVE	CHICAGO
91 4	1	X	X					BRANTLEY, CENNERIA V	3528 W 12TH PL	CHICAGO
91 7	9	X						SEAY, DANTE D	605 E BOWEN AVE	CHICAGO
92 2	8	X						THOMAS, CLARISSA S	7836 S THROOP ST	CHICAGO
92 2	1 0		X					INGEBRETSON, DANIEL J	3068 N AVERS AVE	CHICAGO
92 3	6	X						MINOR, JULIE ESTHER	1342 W HOWARD ST	CHICAGO
92 3	9		X					DAVIS, AHMANI M	6531 S INGLESIDE AVE	CHICAGO
92 4	5	X						STEPHENS, TERRELL	2214 N SACRAMENTO AVE	CHICAGO
92 4	9	X						BROOKS, SAMANTHA	2530 N SACRAMENTO AVE	CHICAGO
92 6	3		X					HASAN, LAZANE	6127 S INDIANA AVE	CHICAGO
92 9	3	X						PALMER, JASIAH U M	8702 S BURLEY AVE	CHICAGO
93 1	7	X	X					HERBERT, WILLIE C	4343 S GREENWOOD AVE	CHICAGO
93 2	7	X	X					BLACKMAN, WILLIAM A	7822 S SOUTH SHORE DR	CHICAGO
93 3	3	X	X					NELSON, JESSIKA R	216 S CALIFORNIA AVE	CHICAGO
93 7	7		X					PETERMON, BARBARA A	2910 W 64TH ST	CHICAGO
93 8	3	X	X					RILEY, RYAN C	9635 S UNIVERSITY AVE	CHICAGO
94 1	7		X					MABRY, LASHUANA VALENTINA	2373 E 70TH ST	CHICAGO
94 5	6		X					PATTON, ROBERT V	2458 E 72ND ST	CHICAGO
94 8	4		X					HOPKINS, MICHAEL	715 E 61ST ST	CHICAGO

94 9	1	X	X					PALOMINO, RICO GUADALUPE	3748 W 83RD ST	CHICAGO
94 9	9	X	X					CID, MADILEN	5855 N WASHTENAW AVE	CHICAGO
95 1	7		X					LAMARR, TMARA P	7014 S MERRILL AVE	CHICAGO
95 4	7	X	X					CLARK, CHERYL	7131 S YALE AVE	CHICAGO
95 6 0	1	X	X					WILLIAMS, KRYSTAL N	7209 S MERRILL AVE	CHICAGO
95 9	6	X	X					DELEMORE, MARLENE F	7639 S CHAPPEL AVE	CHICAGO
96 0	6	X	X					HOLLIS, NINA M	8050 S INGLESIDE AVE	CHICAGO
96 2	2	X	X					BOLDON, TEARRA PATRESHA	8229 S WOODLAWN AVE	CHICAGO
96 2	6	X	X					CARTHON, TINA MARIE	6253 S MICHIGAN AVE	CHICAGO
96 2	9	X	X					BRELAND, DONNELL PIERRE	901 W 63RD ST	CHICAGO
96 3	9		X					HARRIS, LINDA LORRAINE	611 E 74TH ST	CHICAGO
96 5	7	X	X					BRAMLETT, MARLIN	6941 S PAXTON AVE	CHICAGO
96 7	2	X	X					SMITH, NECKO J	6925 S EMERALD ST	CHICAGO
96 8	5	X	X					HODGES, JOE E	6831 S SANGAMON ST	CHICAGO
97 0	6	X						SMITH, ROBERT	7700 S KINGSTON AVE	CHICAGO
97 2	2	X	X					WONSEY, VIOLA C	7208 S VERNON AVE	CHICAGO
97 2	5	X	X					MITCHELL, DONALD	9936 S GREEN ST	CHICAGO
97 2	1 0	X	X					LACEY, DANIELLE OLIVIA T	4926 S WASHINGTON PARK CT	CHICAGO
97 3	9	X	X					FRAZIER, JAMES E	6532 VERNON AVE	CHICAGO
97 8	5	X						THOMAS, CAREY D	1645 W LE MOYNE ST	CHICAGO
97 9	8	X	X					BRADLEY, HEATHER RENEE	355 E OHIO ST	CHICAGO
98 0	3	X	X					BROWN, HILLIAN H	9920 S WENTWORTH AVE	CHICAGO
98 0	8	X						DAVIS, ISAAC J	4722 S DREXEL AVE	CHICAGO
98 3	3	X	X					DUROJAIYE, SEGUN K	844 E 40TH ST	CHICAGO
98 3	4		X					FRAZIER, DANTE G	5459 S EVERETT AVE	CHICAGO
98 4	8	X	X					MARCHAN, ESMERALDA Y	3549 S WESTERN AVE	CHICAGO
98 4	1 0		X					SANCHEZ, MATTHEW	4527 S SAINT LOUIS AVE	CHICAGO
98 5	5	X	X					WARFIELD, KIMBERLY ANN	8739 S PARNELL AVE	CHICAGO
98 9	3		X					HUNTER, RITA D	6253 S MICHIGAN AVE	CHICAGO
98 9	4	X	X					HUNTER, RETA DELORES	6253 S MICHIGAN AVE	CHICAGO

98 9	9		X					FOSTER, CURTIS O	10421 S MORGAN ST	CHICAGO
99 2	2		X					MASON, DOVELLA	6147 S TROY ST	CHICAGO
99 2	9	X	X					THOMAS, LATOYA S	6253 S MICHIGAN AVE	CHICAGO
10 02	5		X					DAVIS, MICHAEL	4753 N MONTICELLO AVE	CHICAGO
10 04	6		X					SPRAGGINS, TIFFANY A	7642 N BOSWORTH AVE	CHICAGO
10 05	1		X					SPIGHT, KATHLEEN	7450 N ROGERS AVE	CHICAGO
10 05	1 0		X					LOO HERNANDEZ, DIGNA ISABEL	1656 W JONQUIL TER	CHICAGO
10 06	6		X					GREEN, BELINDA	4850 S LAKE PARK AVE	CHICAGO
10 08	4		X					HORTING, KAREN R	1111 S WA ASH AVE	CHICAGO
10 09	2		X					HIBBARD, MARK C	1111 S WABASH AVE	CHICAGO
10 10	9		X					ANSARI, SARTAJ B	111 S WABASH AVE	CHICAGO
10 11	6		X					HENRY, DEBORAH D	4250 S PRINCETON AVE	CHICAGO
10 11	9		X					HENRY, DEBORAH D	4250 S PRINCETON AVE	CHICAGO
10 13	1		X					SMITH, SHARON Y	320 3 21ST ST	CHICAGO
10 13	2		X					PUCKETT, RYAN H	320 E 21ST ST	CHICAGO
10 13	5		X					TARTT, NANCY	320 E 21ST ST	CHICAGO
10 13	9		X					CUSICK, MICHAEL WILLIAM	320 E 21ST ST	CHICAGO
10 13	1 0		X					GRIGGS, SHANTE L	320 E 21ST ST	CHICAGO
10 14	1		X					BLONN, MARY K	320 E 21ST ST	CHICAGO
10 14	2		X					DANCY, BARBARA L	320 E 21ST ST	CHICAGO
10 14	5		X					HASAN, JOSEF	320 E 21ST ST	CHICAGO
10 14	6		X					BLONN, MARY K	320 E 21ST ST	CHICAGO
10 14	7		X					BOTTARI, CARMELO	320 E 21ST ST	CHICAGO
10 14	8		X					KEHOE, TAYLOR J	320 E 21ST ST	CHICAGO
10 14	9		X					MARTIN, ANGELA R	320 E 21ST ST	CHICAGO
10 14	1 0		X					CRUSOR, WILLIAM T	320 E 21ST ST	CHICAGO
10 15	4		X					LETT, CHRISTOPHER D	320 E 21ST ST	CHICAGO
10 16	3		X					CURTIS, MARCIA F	1250 S MICHIGAN AVE	CHICAGO
10 16	4		X					WARD, WILLIAM P	1250 S MICHIGAN AVE	CHICAGO
10 19	1		X					COUCH, MARGARET	4530 S WOODLAWN AVE	CHICAGO

10 19	3	X					MLLER, CURTIS	4530 S WOODLAWN AVE	CHICAGO
10 19	5	X					BERKS, PAUL J	4530 S WOODLAWN AVE	CHICAGO
10 20	3	X					BELCHER, BRENDA	4227 S OAKENWALD AVE	CHICAGO
10 20	6	X					MCKENNY, LUELLA	4227 S OAKENWALD AVE	CHICAGO
10 21	1	X					CARTER, AARON E	1060 E 41ST ST	CHICAGO
10 21	4	X					GARNER, DIEGO M	1060 E 41ST ST	CHICAGO
10 21	9	X					SOSA, DAWN R	1060 E 41ST ST	CHICAGO
10 23	3	X					JONES, CARL	3515 S COTTGE GROVE AVE	CHICAGO
10 24	1	X					HALL, ETHEL M	4250 PRINCETON AVE	CHICAGO
10 24	3	X					SIMS, IDELLA	4250 S PRINCETON AVE	CHICAGO
10 24	5	X					ESTES, YOLANDA M	4250 S PRINCETON AVE	CHICAGO
10 24	6	X					FARRELL, CLYDE	4250 S PRINCETON AVE	CHICAGO
10 24	7	X					GILMORE, LAMONT R	4250 S PRINCETON AVE	CHICAGO
10 24	8	X					SIMPSON, LEON	4250 S PRINCETON AVE	CHICAGO
10 24	9	X					HILL, RUDOLF A	4250 S PRINCETON AVE	CHICAGO
10 24	1 0	X					HOLDEN, STEVEN	4250 S PRINCETON AVE	CHICAGO
10 25	1	X					DAVER, ANTONIA	740 E 43RD ST	CHICAGO
10 25	2	X					BROWN, CHARLES	740 E 43RD ST	CHICAGO
10 25	3	X					BROWN, GWENDOLYN P	740 E 43RD ST	CHICAGO
10 25	4	X					BROWN, CHARLES	740 E 43RD ST	CHICAGO
10 26	1	X					ADAMS, LARRY	740 E 43RD ST	CHICAGO
10 26	4	X					BARNES, ALICE J	740 E 43RD ST	CHICAGO
10 26	6	X					BROWN, ALONZA	740 E 43RD ST	CHICAGO
10 26	9	X					BOWENS, VIRGINIA	740 E 43RD ST	CHICAGO
10 27	2	X					HOBBS, JAMES E	4250 S PRINCETON AVE	CHICAGO
10 27	3	X					SMITH, ANTHONY	4250 S PRINCETON AVE	CHICAGO
10 27	4	X					BROWN, JOHN D	4250 S PRINCETON AVE	CHICAGO
10 27	5	X					HARDY, CHARLES B	4250 S PRINCETON AVE	CHICAGO
10 27	6	X					GOLDWYN, MARK A	4250 S PRINCETON AVE	CHICAGO
10 27	7	X					GAINES, MARIE	4250 S PRINCETON AVE	CHICAGO

10 27	8	X					HOBBS, JAMES E	4250 S PRINCETON AVE	CHICAGO
10 27	9	X					GRAVES, LC	4250 S PRINCETON AVE	CHICAGO
10 28	2	X					GATHINGS, FRANCES E	4800 S LAKE PARK AVE	CHICAGO
10 28	4	X					ATKINS, JOY S	4800 S LAKE PARK AVE	CHICAGO
10 28	5	X					GASTON, GINA B	4800 S LAKE PARK AVE	CHICAGO
10 28	7	X					HAWK, MARY Y	4800 S LAKE PARK AVE	CHICAGO
10 28	8	X					AKIN, LYDIA W	4800 S LAKE PARK AVE	CHICAGO
10 28	9	X					BOSTON, LORRAINE	4800 S LAKE PARK AVE	CHICAGO
10 28 0	1	X					GATHING, VICTORIA SCOTT	4800 S LAKE PARK AVE	CHICAGO
10 29	1	X					PALMER, SONIA	4800 S LAKE PARK AVE	CHICAGO
10 29	2	X					ATKINS, RHONDA M	4800 S LAKE PARK AVE	CHICAGO
10 29	3	X					AVERY, KELI M	4800 S LAKE PARK AVE	CHICAGO
10 29	4	X					BAILEY, DEMETRIUS	4800 S LAKE PARK AVE	CHICAGO
10 29	5	X					BEAVER, ELOWEISE	4800 S LAKE PARK AVE	CHICAGO
10 29	6	X					ERVIN, MEL	4800 S LAKE PARK AVE	CHICAGO
10 29	7	X					GOLORKY, FRED	4800 S LAKE PARK AVE	CHICAGO
10 29	8	X					GRAVES, IONE L	4800 S LAKE PARK AVE	CHICAGO
10 29	9	X					HALL, LONNE M	4800 S LAKE PARK AVE	CHICAGO
10 29	1 0	X					HAWK, MARY Y	4800 S LAKE PARK AVE	CHICAGO
10 30	1	X					ADAMS, GOBIE	740 E 43RD ST	CHICAGO
10 30	2	X					BARNES, WILLIE E	740 E 43RD ST	CHICAGO
10 30	3	X					HOLMES, MARVIN	740 E 43RD ST	CHICAGO
10 30	4	X					HILLMAN, JERRY LEE	740 E 43RD ST	CHICAGO
10 30	5	X					JONES, CARL LEE	740 E 43RD ST	CHICAGO
10 30	6	X					MARTIN, KIM R	740 E 43RD ST	CHICAGO
10 30	8	X					HAYES, JUANITA	740 E 43RD ST	CHICAGO
10 30 0	1	X					LINDSEY, EDDIE J	740 E 43RD ST	CHICAGO
10 31	2	X					ALLEN, CODY D	4747 S KING DR	CHICAGO
10 31	3	X					BRANCH, DARKEYA	4747 S KING DR	CHICAGO
10 31	4	X					BOSTON, JAMES	4747 S KING DR	CHICAGO

10 31	7	X					BANKS, GEORGE B	4747 S KING DR	CHICAGO
10 32	9	X					ALEX, GREGORY C	4747 S KING DR	CHICAGO
10 33	3	X					CASTILLO, CESAR I	4816 S LAMON AVE	CHICAGO
10 33	4	X					MARTINEZ, MELISSA	6828 S KEELER AVE	CHICAGO
10 33	5	X					BROWN, SARAH I	1428 W BERTEAU	CHICAGO
10 35	1	X					COX, MARVIS	4850 S LAKE PARK AVE	CHICAGO
10 36	2	X					LEE, EVONNE	4250 S PRINCETON AVE	CHICAGO
10 36	3	X					LI, YIP CHING	4250 S PRINCETON AVE	CHICAGO
10 36	5	X					CHANDLER, ISIAH	4250 S PRINCETON AVE	CHICAGO
10 36	7	X					JONES, JOHN	4250 S PRINCETON AVE	CHICAGO
10 36	8	X					AUSTIN, MARY A	4250 S PRINCETON AVE	CHICAGO
10 36	9	X					YOUNG, ROSETTA	4250 S PRINCETON AVE	CHICAGO
10 37	1	X					BOWMAN, RENA A	4747 S KING DR	CHICAGO
10 38	1	X					BOOKER, NINA	4747 S KING DR	CHICAGO
10 38	5	X					BOSTON, JAMES	4747 S KING DR	CHICAGO
10 39	7	X					HUNTLEY, LA QUITA	1912 S 10TH ST	MAYWOOD
10 42	2	X					MOORE, RICHARD LEWIS	6106 S EBERHART AVE	CHICAGO
10 42	3	X					PAYTON, OMAR S	7549 S YATES AVE	CHICAGO
10 42	5	S					SUGGS, MARY L	6754 S CRANDON AVE	CHICAGO
10 48	2	X					ROBINSON, ANTHONY	1951 N HUMBOLDT BLVD	CHICAGO
10 49	3	X					JENKINS, MARY C	10637 S CHAMPLAIN AVE	CHICAGO
10 49	5	X					PAGE, LAJANICE V	8449 S THROOP ST	CHICAGO
10 50	7	X					COYNE, MEG ANNE E	3945 W DAKIN ST	CHICAGO
10 52	9	X					STUBBS, PAULETTE	4750 N SHERIDAN RD	CHICAGO
10 63	2	X					POPE, CHRISTOPHER JAMES	7617 S SOUTH SHORE DR	CHICAGO
10 64	1	X					BROWN, FATIMA M	7229 S HOMAN AVE	CHICAGO
10 68	2	X					SHULTHEISZ, MARY JOAN	606 W 18TH ST	CHICAGO
10 77	7	X					WORDLAW, MARIETTA A	10510 S EDBROOKE AVE	CHICAGO
10 79	1	X					BRADLEY, DORIS M	31 W 109TH ST	CHICAGO
10 80	5	X					BAILEY, SHIRLEY J	1658 W WASECA PL	CHICAGO

10 88	4		X				THOMAS, DAVID	7110 S DOBSON AVE	CHICAGO
10 89	9		X				BRYANT, CHERIKA N	764 S SOUTH SHORE DR	CHICAGO
10 90	4		X				RATLIFF, MARQUETTA	1531 E 85TH PL	CHICAGO
10 93	1 0		X				MCRUFFUS, MICHELLE D	10242 S NORMAL AVE	CHICAGO
10 94	8		X				BOOZER, MARIE ANTOINET	115 E 104TH ST	CHICAGO
10 95	8		X				GRAHAM, MICHAEL J	10220 S MICHIGAN AVE	CHICAGO
10 98	5		X				PRICE, ANDREW L	3440 W POLK ST	CHICAGO
10 98	7		X				AVERY, DON	3440 W POLK ST	CHICAGO
10 98	9		X				INNIS, DANIEL	2323 N MEADE AVE	CHICAGO
13 00	6		X				GATES, CHARLIE	3500 S LAKE PARK AVE	CHICAGO
13 01	1		X				BOWIE, JOHN H	2425 W HOMER	CHICAGO
13 01	2		X				CHRISTMAS, STANLEY J	2434 W MOFFAT ST	CHICAGO
13 01	3		X				LUX, TRACY J	2434 W MOFFAT ST	CHICAGO
13 01	8		X				ENDO, MARY E	1130 S MICHIGAN AVE	CHICAGO
13 04	9		X				PADILLA HINOJOSA, ARMANDO	5444 W SCHUBERT AVE	CHICAGO
13 09	1	X					KARKAZIS, SHIRLEY J	2662 RIVER RD	RIVER GROVE
13 10	1		X				METRO, MELISSA C	2530 W CARMEN AVE	CHICAGO
13 10	4	X	X				SERPICO, SHANNON L	1606 DIVISION ST	MELROSE PARK
13 10	8		X				VIRUET, KAYLA M	1410 N 12TH AVE	MELROSE PARK
13 12	9	X	X				WILSON, JADE	10404 S TRIPP AVE	OAK LAWN
13 13	1		X				BOBENHOUSE, DOUGLAS R	952 N WOOD ST	CHICAGO
13 13	4		X				LAKEN, TIMOTHY W	851 N WOLCOTT AVE	CHICAGO
13 13	5		X				PEREZ, NOEMI	1953 N CAMPBELL AVE	CHICAGO
13 13	6		X				WARING, LAURA VICGTORIA LEIGH	1968 N MILWAUKEE AVE	CHICAGO
13 13	7		X				NEWSON, DEWAYNE	344 W 43RD ST	CHICAGO
13 13	8		X				BURNS, EDNA M	2644 N HOYNE AVE	CHICAGO
13 13	9		X				YOUNG, MAURICE E	344 W 43RD ST	CHICAGO
13 13	1 0		X				DIAZ, JOSE R	2649 N HOYNE AVE	CHICAGO
13 15	2		X				SHAW, ARITHA B	1316 BURNHAM AVE	CALUMET CITY
13 15	5		X				DINGLE, MERRIL L	7235 S JEFFERY BLVD	CHICAGO

13 15	7		X					TRIPLETT, RONALD R	12018 S UNION AVE	CHICAGO
13 15	8		X					HAYNES, LINDIA G	11314 S WALLACE ST	CHICAGO
13 17	2		X					RAY, DOROTHY M	8031 S HALSTED ST	CHICAGO
13 17	9		X					KENNERSON, NICOLE	7927 S CAMPBELL AVE	CHICAGO
13 18	5	X	X					BINION, NICOLE UNIQUE	640 N CENTRAL AVE	CHICAGO
13 18	6		X					FLEMING, STINELL A	1309 W 73RD L	CHICAGO
13 18	7		X					CAMPBELL, MARTHA JANE	814 E 65TH ST	CHICAGO
13 22	1		X					MITCHELL, MARQUIETTA R	525 E 91ST ST	CHICAGO
13 29	4		X					WILLIAMS, JOHN W	2210 E 68TH ST	CHICAGO
13 34	3		X					FIGURES, EBONY I	12111 S NORMAL AVE	CHICAGO
13 34	4		X					ROBERTS, LATONYA S	12217 S PEORIA ST	CHICAGO
13 40	1		X					LACEY, EBONY ALEXIS	5912 W WASHINGTON BLVD	CHICAGO
13 41	6		X					CARELLI, AMANDA	7817 W BELMONT AVE	ELMWOOD PARK
13 51	2		X					WASHINGTON, ROBERT	11321 S WENTWORTH AVE	CHICAGO
13 52	8		X					BROOKS, BRIAN	11321 S WENTWORTH AVE	CHICAGO
13 67	6		X					CIVITO, TINA MARIE	806 S LEAVITT ST	CHICAGO
13 69	3		X					ADAMS, DOMINIQUE NICOLE	2971 S FEDERAL ST	CHICAGO
13 71	8		X					WESTBROOK, JUJUANIS J	4106 W 21ST PL	CHICAGO
13 72	1		X					DIAGNE, MOUHAMMED N	3114 W MARQUETTE RD	CHICAGO
13 73	3		X					SHERMAN, ROGER G	1610 W WALLEN AVE	CHICAGO

**WHEREFORE**, for the reasons stated above, Candidate, JAN KOWALSKI, respectfully prays:

- g. this honorable Electoral Board grant this Rule 11 Motion to reconsider;
- h. this honorable Electoral Board grant this Rule 8 Motion, schedule an evidentiary hearing pursuant to Rule 8 of the adopted Rules of Procedure, protect the integrity of the electoral process by finding the staff at the records examination in error and strike certain signatures of purported petition signers

at issue herein;

- i. and for any such other and further relief as the Electoral Board may consider proper.

Respectfully Submitted,

/s/ Deborah Moldover  
Attorney for Candidate-Respondent

Deborah Moldover, Esq.  
**ROSS D. SECLER & ASSOCIATES**  
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Chicago, Illinois 60602  
Telephone: (312) 853-8000  
Facsimile: (312) 853-8008  
[dmoldover@chicagoelectionlaw.com](mailto:dmoldover@chicagoelectionlaw.com)

**Certificate of Service**

The undersigned, an attorney, certifies that she filed this Motion to Reconsider Hearing Officer's Order re: Candidate's Emergency Motion to Extend Time to File Rule 8 Motion; Candidate's Rule 8 Motion via email delivery to Hearing Officer Agrella and Objector's Counsel Michael Kasper in accordance with the Rules of Procedure adopted in this proceeding, on or before 5:00 pm on December 24, 2015.

By: /s/ Deborah Moldover  
Deborah Moldover

M

1. The said Electoral Board has been legally constituted according to the laws of the State of Illinois;
2. Objections to the nomination papers of the candidate herein were duly filed;
3. A Call to the hearing on said objections was duly issued and was caused to be served upon the members of the Electoral Board, the objector and the candidate, by mail and by personal service as provided by Statute;
4. An initial public hearing was held on these objections on Monday, December 14, 2015;
5. There were present at such hearings the following persons, among others:
  - a) Honorable David Orr, by Daniel P. Madden, Honorable Anita Alvarez, by Donald J. Pechous, and Honorable Dorothy Brown, by Gloria Legette;
  - b) Objector, by Counsel
  - c) Candidate, by Counsel
6. All evidence, if any, that was tendered by those appearing at the hearing was heard and considered by the Board;
7. All arguments, if any, that were made at the hearing were considered by the Board;
8. The Board having heard oral argument and having considered all evidence, if any, **HEREBY MAKES THE FOLLOWING FINDINGS:**

The Board has received and reviewed the Recommendation of the Hearing Officer (which is attached) and agrees with its conclusion and rationale. The Board specifically agrees with and adopts the determinations of the Hearing Officer on the Candidate's Motions in respect to Rule 8. The Board adopts the findings of the Hearing Officer as the findings of the Board and sustains the Objection herein based on the Candidate's failure to have a sufficient number of valid signatures.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that the objections of Audrey C. Jaycox, to the nomination papers of Jan Kowalski, candidate for the office of Recorder of Deeds of Cook County, located in the County of Cook, State of Illinois are hereby sustained in conformity with the findings in paragraph 8. The said nomination papers are hereby declared invalid, the name of Jan Kowalski, candidate for the Recorder of Deeds of Cook County, shall not be printed on the ballot for the Primary Election to be held on Tuesday, March 15, 2016.

DATED; at Chicago, Illinois this 30<sup>th</sup> day of December, 2015

DAVID ORR, Chairman

by:

  
Daniel P. Madden

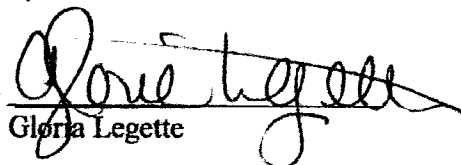
ANITA ALVAREZ, Member

by:

  
Donald J. Pechous

DOROTHY BROWN, Member

by:

  
Gloria Legette