

**BEFORE THE DULY CONSTITUTED ELECTORAL BOARD FOR THE  
HEARING AND PASSING UPON OF OBJECTIONS TO NOMINATION  
PAPERS OF CANDIDATES FOR ELECTION TO THE OFFICE OF CITY  
COUNCIL, CITY OF NAPERVILLE, DUPAGE AND WILL COUNTIES,  
ILLINOIS**

DIANNE A. MCGUIRE )  
NANCY HANS TURNER )  
MARK VINCENT URDA )  
)  
Petitioners – Objectors, )  
v. )  
)  
**FARID MALIK SHABAZZ** )  
(from 2003-2024, per sworn statement v. 1, )  
Statement of Candidacy) )  
)  
**ALIAS** )  
**DAVID HUGHES** )  
(Birth-2003, *id.*) )  
)  
**ALIAS** )  
**FARID (NMN) SHABAZZ** )  
(With **no disclosed name change** to voters, )  
eighteen separate sworn statements, as )  
mandated by law, a/k/a v. 2) )  
)  
**ALIAS** )  
**DAVID HUGHES/FARID (NMN)** )  
**SHABAZZ** )  
(Name change effected **May 2023**, )  
per thirty-six sworn statements a/k/a v.3) )  
)  
**ALIAS** )  
**DAVID HUGHES/FARID (NMN)** )  
**SHABAZZ** )  
**\*Birth-March 2023, and March 2023-now** )  
Various sworn statements and DuPage )  
County Circuit Court records, a/k/a v. 4) )  
)  
Respondent – Attempted Candidate. )



11:58 am

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## VERIFIED OBJECTORS' PETITION

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Petitioners-Objectors, Dianne A. McGuire, Nancy Hans Turner, and Mark Vincent Urda (“Objectors”) pursuant to 10 ILCS 5/10-8 respectfully move this Board to nullify the candidacy of the above-referenced Attempted Candidate held himself out under different varieties of names and a/k/a identifiers to hundreds of voters and the City of Naperville, which also conflict with court filings uncovered in the Circuit Court of DuPage County, Illinois. Conflicting sworn statements, submitted by the candidate himself, showed **multiple names in overlapping timeframes**, no consistency in any filings, and **conflicting sworn statements** about (i) **whether** his name had ever changed, (ii) **when** if ever it had changed, and (iii) whether his candidacy should be under one name **without alias**, a different version of name **with alias**, or **an entirely different name** with a different date of assumption of alias altogether. The attempted candidacy is void, as a matter of law, under both of the prongs of 10 ILCS 5/10-5.1, because of 1) the glaring internal **inconsistencies** noted above, and 2) the **complete absence** of a proper affidavit explaining the name change (mandatory under Illinois law). Further, **none** of Attempted Candidates’ paperwork is consistent with name change proceedings revealed by DuPage County Court records.

1. Objector Dianne A. McGuire resides at 1235 Tennyson Lane, Naperville, Illinois 60540, Objector Nancy Hans Turner resides at 2148 Riverlea Circle, Naperville, Illinois 60565, Objector Mark Vincent Urda resides at 11 North Brainard Street, Naperville, Illinois 60540. All Objectors are duly qualified, legal and registered to vote at their addresses.

2. The Objectors’ interest in filing this Petition is that of a voters desirous that the laws governing the filing of nomination papers for the Office of City Council, Naperville, Illinois

are properly complied with, and that only qualified candidates, residents of Naperville, properly disclosing their known aliases to voters per state law, appear on the ballot for said Office.

3. In Illinois elections, “If a candidate has changed his or her name . . . within 3 years before the last day for filing the certificate of nomination or nomination papers for that office, whichever is applicable, then (i) the candidate's name on the certificate or papers must be followed by "formerly known as (list all prior names during the 3-year period) until name changed on (list date of each such name change)" and (ii) the certificate or paper must be accompanied by the candidate's affidavit stating the candidate's previous names during the period specified in (i) and the date or dates each of those names was changed; **failure to meet these requirements shall be grounds for denying certification of the candidate's name for the ballot** or removing the candidate's name from the ballot, as appropriate. 10 ILCS 5/10-5.1.

4. “The candidate’s name should appear **in exactly the same form on the petition sheets, Statement of Candidacy, and Loyalty Oath.**” *2025 Candidate’s Guide* issued by the Illinois State Board of Elections (as amended, 8/1/2024; p. 20).

5. Rather than choosing a consistent strategy for petitioning, Candidate presented two competing (and entirely different) stories to voters: In **eighteen separate petition sheets**, each sworn to and under oath by the attempted candidate himself, he held himself out to have been named “Farid Shabazz” **specifically swearing to have never to be known by any other name** in the past three years. He signed each sheet, under oath, attesting to the veracity of the statements contained therein. At the very same time, he collected sheets from voters who were told a **different story**, about him wanting to be listed as “Farid Shabazz” and having changed his name in May of 2023 (also an incorrect statement). However, none of hundreds of inconsistent stories told to voters

are consistent with the story he presented to the city, or the courts for that matter, or the version of himself which would end up on the ballot were he to be allowed to continue.

6. On October 24, 2024, Attempted Candidate improperly filed nominating papers with the City of Naperville requesting to be on the ballot under the name “Farid Malik Shabazz,” which is inconsistent with all of his petition sheets (which are themselves inconsistent). The filings showed that on October 22, 2024, Attempted Candidate executed an official statement, sworn under oath, titled “Statement of Candidacy,” in which he claimed the name Farid Malik Shabazz, and claimed to have been known as David Hughes until he legally changed it in 2003. **Zero** signatories to any petitions were presented with information consistent with **either** the name being listed or the alias being assumed in 2003.

7. **Zero** signatories to any of the petitions signed consented to a candidate with the name “Malik” being listed on the ballot for the election, as is requested in the Statement of Candidacy.

8. **Zero** signatories to any of the petitions signed contained information consistent with the name change date cited in the Statement of Candidacy, and now requested to be on the ballot.

9. The internal inconsistencies between the candidates sworn statements, what he presented to voters, and how he asks to be presented on the ballot, caused the Objectors to review court records, and learn that a name change was apparently effected for Attempted Candidate on a date that matches none of the stories presented above (also listing him under an **Aurora** address). In other words, **none** of the candidate paperwork, **none** of the various stories told to signatories, and **none** of the sworn statements match the actual legal record.

10. As stated above, “If a candidate has changed his or her name . . . within 3 years before the last day for filing the certificate of nomination or nomination papers for that office, whichever is applicable, then (i) the candidate's name on the certificate or papers must be followed by "formerly known as (list all prior names during the 3-year period) until name changed on (list date of each such name change)" and (ii) the certificate or paper must be accompanied by the candidate's affidavit stating the candidate's previous names during the period specified in (i) and the date or dates each of those names was changed; **failure to meet these requirements shall be grounds for denying certification of the candidate's name for the ballot** or removing the candidate's name from the ballot, as appropriate. 10 ILCS 5/10-5.1. The **only** exceptions are name changes resulting from adoption to assume an adoptive parent's or parents' surname, marriage or civil union to assume a spouse's surname, or dissolution of marriage or civil union or declaration of invalidity of marriage or civil union to assume a former surname or a name change that conforms the candidate's name to his or her gender identity.” Candidate **meets** none of these requirements or exceptions.

11. As Illinois law requires candidates who changed their name within three years before the filing date to include an **affidavit** as to the name change when filing petitions, attempted Candidate chose to entirely **ignore** this legal requirement, barring his candidacy for that reason alone. “Failure to meet these [name change disclosure] requirements shall be grounds for denying certification of the candidate’s name for the ballot.” *2025 Candidate’s Guide* issued by the Illinois State Board of Elections (as amended, 8/1/2024; p. 20).

12. Even had Attempted Candidate included a proper affidavit, his submission would still be void as a matter of law due to the mismatch between what he is now claiming, what he told some voters, what he told other voters, and what court records show to be the actual case. At least

four separate versions of sworn statements, regarding something as fundamental as the person voters are choosing to represent them, would then be in existence. As stated above and required by Illinois, “The candidate’s name should appear **in exactly the same form on the petition sheets, Statement of Candidacy, and Loyalty Oath.**”

13. Earlier this year, in *Rice v. Cook Cnty. Officers Electoral Bd.*, 2024 IL App (1st) 240230-U, the appellate court upheld the affirmance by the Cook County Circuit Court of the Cook County Officers Electoral Board’s decision to prevent a candidate’s name from appearing on the ballot due to the failure of the candidate to comply with three-year name disclosure requirement of 10 ILCS 5/7-10.2, which is identical to 10 ILCS 5/10-5.1. It is difficult to imagine a more important or consequential requirement than the accuracy of a candidate’s name and change history. The candidate’s current and former names are the only means by which voters can do research to learn about a candidate, or follow news about a candidate. Without an accurate name to go on, voters can be easily misled and misinformed.

14. Compliance with the name requirements imposed by 10 ILCS 5/7-10.2 is strictly enforced and not a matter where this Board has discretion to accept less than full compliance. When an election board allows a candidate to appear on a ballot without strict compliance with the name requirements, the courts will reverse the board’s decision and remove the candidate from the ballot. *Oberholtzer v. Cook County Officers Electoral Board*, 2020 IL App (1st) 200218-U (“The Candidate’s failure to [comply with the name requirements] violated the terms of section 7-10.2 of the Election Code, which invalidates her nomination papers, *necessitating* her removal from the ballot” (emphasis supplied)); *Jackson-Hicks v. E. St. Louis Bd. of Election Comm’rs*, 28 N.E.3d 170, 2025 IL 118929 (“a candidate’s failure to comply with mandatory provisions of the

Election Code governing nomination papers will therefore render the nomination papers invalid and require that the candidate's name be removed from the ballot)” (citations omitted)).

15. The written portion of the Objection thus far is premised on the fact that the entire candidacy is void as a matter of law. Were Attempted Candidate to cobble together some fifth or sixth version of events in an attempt to resurrect his candidacy, Objectors also reserve the right to all valid challenges such as Naperville residency, validity of signatures, etc. **See Attached sheet listing obvious errors on Attempted Candidate’s petition sheets.** Attempted Candidate’s multiple stories about his name make it hard to determine if residency requirements are met. Objectors reserve the right to challenge Candidate’s Naperville residency as additional information may come to light in sorting out the story regarding who he is.

16. Additionally, the Board, as an arm of government, should consider how to approach the issue with the attempted candidate of why a non-Naperville address was apparently doctored to appear to be a Naperville address on page 12, line 1, page 12, line 4, page 29, line 6, on a page which are again a sworn statements.

17. In Illinois election law, “When statutory language is plain and unambiguous, the statute must be applied as written without resort to aids of statutory construction, and the court will not read into it exceptions, conditions, or limitations that the legislature did not express.” *Jackson-Hicks v. E. St. Louis Bd. of Election Comm'rs*, 28 N.E.3d 170, 2025 IL 118929 (2015)., citing *Maksym v. Board of Election Commissioners*, 242 Ill. 2d 303, 318 (2011). “The requirements of the Illinois Election Code are mandatory, not directory.” *Purnell v. Municipal Electors Board*, Cook County, No. 1-95-0292 (1995), citing *Jones v. Municipal Officers Electoral Board* (1983), 112 Ill. App.3d 926, 930, 446 N.E.2d 256.

18. Fundamentally, the Petitioners are requesting the Board to simply enforce the law. Voters deserve to know who they are signing petitions for. Sworn statements collected under oath should be consistent, especially when they are signed on the same day. A ballot should match the Statement of Candidacy and the names on the petitions circulated. All should match the actual legal orders issued by a court of law, particularly in something as fundamental as a candidate's identity.

WHEREFORE, the Objectors request a hearing based on the facts set forth herein, and a ruling that the Attempted Candidate shall not appear and not be printed on the ballot for election to the Office of City Council, City of Naperville, DuPage and Will Counties, in 2025. Furthermore, Objectors reserve the right to present evidence of further improprieties or discrepancies between listed "signatures" and actual voter rolls as such evidence comes to light.

Respectfully Signed

  
Dianne A. McGuire

  
Nancy Hans Turner

  
Mark Vincent Urda

Attachment 1:

Sheet of deficient "signatures"



# Attachment 1

Page 1 - No Name Change Listed  
Page 2 - No Name Change Listed  
Page 3 - No Name Change Listed  
Page 4 - No Name Change Listed  
Page 5 - No Name Change Listed  
Page 6 - Line 1 - Unable to Verify Registered Voter by this name at this address  
Page 6 - Line 5 - Unable to Verify Registered Voter by this name at this address  
Page 6 - Line 7 - Unable to Verify Registered Voter by this name at this address  
Page 6 - Line 9 - Voter is not registered to vote at this address  
Page 6 - Line 10 - Unable to Verify Registered Voter by this name at this address  
Page 7 - No Name Change Listed  
Page 8 - No Name Change Listed  
Page 9 - Line 1 - Unable to Verify Registered Voter by this name at this address  
Page 9 - Line 3 - Unable to Verify Registered Voter by this name at this address  
Page 9 - Line 10 - Illegible. Unable to Verify.  
Page 10 - Line 1 - Incomplete Address  
Page 10 - Line 2 - Incomplete Address  
Page 10 - Line 3 - Incomplete Address  
Page 10 - Line 4 - Incomplete Address  
Page 10 - Line 5 - Incomplete Address  
Page 10 - Line 6 - Incomplete Address  
Page 10 - Line 7 - Incomplete Address  
Page 10 - Line 8 - Voter Lives in Unincorporated Naperville  
Page 10 - Line 9 - Voter Lives in Unincorporated Naperville  
Page 10 - Line 10 - Incomplete Address  
Page 11 - Line 1 - Incomplete Address  
Page 12 - Line 1 - Voters Lives in Aurora. Crossed Out Aurora and Put in Naperville.  
Page 12 - Line 4 - Voters Lives in Aurora. Crossed Out Aurora and Put in Naperville.  
Page 12 - Line 5 - Address is in Aurora.  
Page 12 - Line 10 - Unable to Verify Registered Voter by this name at this address  
Page 13 - Line 8 - Unable to Verify Registered Voter by this name at this address  
Page 14 - Line 4 - Unable to Verify Registered Voter by this name at this address  
Page 14 - Line 6 - Printed Name. No Signature. Unable to Verify Registered Voters by this name at this address  
Page 14 - Line 7 - Unable to Verify Registered Voter by this name at this address  
Page 15 - No Name Change Listed  
Page 16 - Line 2 - Unable to Verify Registered Voter by this name at this address  
Page 17 - Line 3 - Unincorporated Naperville  
Page 17 - Line 4 - Unable to Verify Registered Voter by this name at this address  
Page 17 - Line 10 - Unable to Verify Registered Voter by this name at this address  
Page 19 - Line 1 - Unable to Verify Registered Voter by this name at this address  
Page 19 - Line 7 - No Address Listed. Phone Number Listed.  
Page 19 - Line 9 - Unable to Verify Registered Voter by this name at this address  
Page 19 - Line 10 - Unable to Verify Registered Voter by this name at this address

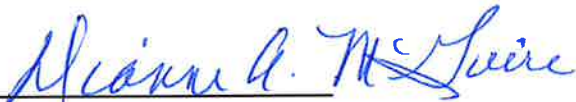
Page 20 - Line 9 - Unable to Verify Registered Voter by this name at this address  
Page 20 - Line 10 - No Signature. Printed Name Only.  
Page 22 - Line 3 - Unable to Verify Registered Voter by this name at this address  
Page 23 - Line 6 - Unable to Verify Registered Voter by this name at this address  
Page 23 - Line 7 - Unable to Verify Registered Voter by this name at this address  
Page 23 - Line 9 - Unable to Verify Registered Voter by this name at this address  
Page 24 - Line 7 - Incomplete Address  
Page 25 - Line 1 - Incomplete Address  
Page 25 - Line 9 - Unable to Verify Registered Voter by this name at this address  
Page 26 - Line 1 - Incomplete Address  
Page 26 - Line 2 - Incomplete Address  
Page 26 - Line 3 - Incomplete Address  
Page 26 - Line 4 - Incomplete Address  
Page 26 - Line 5 - Incomplete Address  
Page 26 - Line 6 - Incomplete Address  
Page 26 - Line 8 - No Signature. Printed Name Only.  
Page 27 - Line 9 - Retail Property Address. Unable to Verify Registered Voter by this name at this address  
Page 28 - Line 1 - Incomplete Address  
Page 28 - Line 6 - Aurora Address  
Page 29 - Line 2 - Unable to Verify Registered Voter by this name at this address  
Page 29 - Line 6 - Wheaton Address  
Page 29 - Line 7 - North Lake Address  
Page 31 - Line 5 - Unable to Verify Registered Voter by this name at this address  
Page 32 - Line 4 - Unable to Verify Registered Voter by this name at this address  
Page 32 - Line 5 - Unable to Verify Registered Voter by this name at this address  
Page 33 - Line 9 - Unable to Verify Registered Voter by this name at this address  
Page 34 - Line 9 - Unable to Verify Registered Voter by this name at this address  
Page 35 - Line 9 - Unable to Verify Registered Voter by this name at this address  
Page 37 - No Name Change Listed  
Page 38 - No Name Change Listed  
Page 39 - Wrong Election Date (April 25, 2025)  
Page 41 - No Name Change Listed  
Page 42 - No Name Changed Listed  
Page 43 - No Name Change Listed  
Page 44 - No Name Change Listed  
Page 45 - Line 8 - Unable to Verify Registered Voter by this name at this address  
Page 45 - Line 9 - Unable to Verify Registered Voter by this name at this address  
Page 46 - No Name Change Listed  
Page 47 - No Name Change Listed  
Page 49 - Line 1 - No Signature. Printed Name Only.  
Page 49 - Line 3 - No Signature. Printed Name Only.  
Page 49 - Line 4 - No Signature. Printed Name Only.  
Page 49 - Line 5 - No Signature. Printed Name Only.

Page 49 - Line 7 - Unable to Verify Registered Voter by this name at this address  
Page 50 - No Name Change Listed  
Page 51 - No Name Change Listed  
Page 52 - Line 1- Incomplete Address  
Page 53 - Line 2 - Unable to Verify Registered Voter by this name at this address  
Page 53 - Line 3 - No Signature. Printed Name ONLY.  
Page 53 - Line 6 - Unable to Verify Registered Voter by this name at this address  
Page 53 - Line 7 - Unable to Verify Registered Voter by this name at this address  
Page 54 - Line 1 - Incomplete Address  
Page 54 - Line 2 - Incomplete Address  
Page 54 - Line 4 - Unable to Verify Registered Voter by this name at this address  
Page 54 - Line 6 - Unable to Verify Registered Voter by this name at this address  
Page 54 - Line 7 - Unable to Verify Registered Voter by this name at this address  
Page 54 - Line 8 - Unable to Verify Registered Voter by this name at this address

**VERIFICATION**

State of Illinois, )  
 )  
County of DuPage ) SS  
 )  
 )

The undersigned, being first duly sworn, deposes and states that the undersigned is a Petitioner-Objector in the above Verified Objector's Petition, and that the undersigned has read the contents thereof, and that the allegations therein are true to the best of the undersigned's knowledge and belief.

  
\_\_\_\_\_  
Dianne A. McGuire  
Petitioner-Objector

Subscribed and sworn to before me, a Notary Public, by Dianne A. McGuire on

NOVEMBER 3, 2024




  
\_\_\_\_\_  
Notary Public

**VERIFICATION**

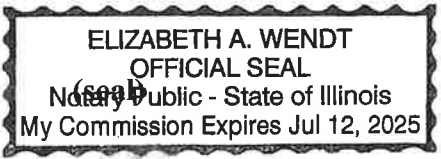
State of Illinois,                     )  
   )  
County of DuPage                    )     SS  
   )  
   )

The undersigned, being first duly sworn, deposes and states that the undersigned is a Petitioner-Objector in the above Verified Objector’s Petition, and that the undersigned has read the contents thereof, and that the allegations therein are true to the best of the undersigned’s knowledge and belief.

  
\_\_\_\_\_  
Nancy Hans Turner  
Petitioner-Objector

Subscribed and sworn to before me, a Notary Public, by Nancy Hans Turner on

NOVEMBER 3, 2024



  
\_\_\_\_\_  
Notary Public

**VERIFICATION**

State of Illinois,                                    )  
  )  
County of DuPage                                )     SS  
  )  
  )

The undersigned, being first duly sworn, deposes and states that the undersigned is a Petitioner-Objector in the above Verified Objector's Petition, and that the undersigned has read the contents thereof, and that the allegations therein are true to the best of the undersigned's knowledge and belief.



Mark Vincent Urda  
Petitioner-Objector

Subscribed and sworn to before me, a Notary Public, by Mark Vincent Urda on

NOVEMBER 3, 2024



  
Notary Public