COPY

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

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DIANNE A. MCGUIRE)
NANCY HANS TURNER)
MARK VINCENT URDA)
)
Petitioners – Objectors,)
)
v.)
)
NAG JAISWAL,)
)
Respondent – Candidate.)
)

VERIFIED OBJECTOR'S PETITION

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 Nag Jaiswal ("Candidate" or "Mr. Jaiswal" as appropriate) and in support thereof state as follows:

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 Objector's interest in filing this Petition is that of a voter 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 appear on the ballot for said Office.

3. On October 28, 2024, Candidate filed nominating papers with the City of Naperville including fifty (out of fifty) petitions for a Consolidated Primary Election to be held April 1, 2025. As there is no Primary Election to be held April 1, 2025, all fifty of Mr. Jaiswal's petitions are ineffective as a matter of law. "Such petitions shall . . . contain, above the space for signature, an appropriate heading." (10 ILCS 5/10-4) An "appropriate heading" means "[t]he heading of the nomination petition pages must include information relative to the election." *2025 Candidate's Guide* (Illinois State Board of Elections, amended 8/1/2024; p.19). Stating the wrong election is not an appropriate heading because it does not include information relative to the actual election.

4. In addition to Candidate's petitions informing voters of his intent to run in a non-existent April 1, 2025 primary election, under 10 ILCS 5/7-12, "where the nomination is to be made for a municipal or township office," such petitions must be filed, "not more than 127 nor less than 120 days before the primary date," which would also mean his petitions were neither circulated nor filed within the time periods dictated by the dates listed on his fifty (50) petitions, or described in the notarized statements in each petition. Filing dates in the Election Code are strictly enforced. *DuPage County Election Comm. v. State Board of Elections*, 279 Ill.Dec. 695, 800 N.E.2d 1278, 345 Ill. App.3d 200 (2003).

5. Additionally, under 10 ILCS 5/10-4, each petition is legally mandated to, "be signed by the qualified voters in their own proper persons only, and opposite the signature of each signer his residence address shall be written or printed."

6. The nomination papers do not qualify Mr. Jaiswal for the ballot. Even beyond the fatal flaw outlined above Mr. Jaiswal's petitions fail on the following grounds:

a. Presuming the election to which Candidate was referring in his petitions was intended to be the 2025 Naperville City Council election, for which the actual consolidated primary date is February 25, 2025 (not April 1, 2025), the number of required signatures of qualified voters residing in the City of Naperville is 317.

b. Even a cursory review of Candidate's paperwork reveals that less than 317 purported "signatures" are valid.

c. Attached is a list of invalid lines, categorized from 1) not a qualified voter in the City of Naperville, to 2) no signature, to 3) no residence address either written or printed, to 4) duplicate signatures, to 5) improper attestation by circulator (entire pages 7, 10, 15, and 19 invalid).

d. Even striking just these submissions, Mr. Jaiswal lacks 317 signatures and thus cannot qualify for the ballot as a matter of law, let alone other non-qualified signatories that may come to light beyond this initial search. It is not difficult to ask signatories if they live in Naperville, to verify they are registered voters, and ask them to sign as well as include their printed address. It is not fair to uphold this legal standard for other candidates but not one.

Signature Pages Follow.

WHEREFORE, the Objectors request a hearing based on the facts set forth herein, and a ruling that the name Nag Jaiswal 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 (beyond the above and the attached spreadsheet) as such evidence comes to light.

Respectfully Signed

Dianne A. McGuire

Nancy Hans Turner

Mark Vincent Urda

Attachment 1:

List of deficient "signatures"

ATTACHMENT 1

Page 1 - Line 6 - Unable to Verify Registered Voter by this name at this address
Page 3 - Line 5 - Unable to Verify Registered Voter by this name at this address
Page 4 - Line 2 - Unable to Verify Registered Voter by this name at this address
Page 5 - Line 1 - Unable to Verify Registered Voter by this name at this address
Page 5 - Line 4 - Unable to Verify Registered Voter by this name at this address
Page 5 - Line 7 - Unable to Verify Registered Voter by this name at this address
Page 6 - Line 1 - Unable to Verify Registered Voter by this name at this address
Page 7 - Line 3 - Unable to Verify Registered Voter by this name at this address
Page 7 - Line 4 - Unable to Verify Registered Voter by this name at this address
Page 7 - Line 10 - Unable to Verify Registered Voter by this name at this address
Page 8 - Line 4 - Unable to Verify Registered Voter by this name at this address
Page 8 - Line 1 - Printed. No Signature.
Page 8 - Line 4 - Unable to Verify Registered Voter by this name at this address
Page 8 - Line 5 - Printed. No Signature.
Page 8 - Line 6 - Printed. No Signature.
Page 8 - Line 7 - Printed. No Signature.
Page 8 - Line 8 - Not in District. Listed Address is Bolingbrook.
Page 8 - Line 9 - Not in District. Listed Address in Bolingbrook.
Page 9 - Line 1 - Printed. No Signature.
Page 9 - Line 2 - Printed. No Signature.
Page 9 - Line 3 - Printed. No Signature.
Page 9 - Line 4 - Printed. No Signature.
Page 9 - Line 5 - Printed. No Signature. Unable to Verify Registered Voter by this name at this address
Page 9 - Line 6 - Printed. No Signature. Unable to Verify Registered Voter by this name at this address
Page 9 - Line 7 - Printed. No Signature.
Page 9 - Line 8 - Printed. No Signature.
Page 9 - Line 9 - Printed. No Signature.
Page 9 - Line 10 - Printed. No Signature.
Page 9 - Line 11 - Printed. No Signature.
Page 10 - Line 2 - Unable to Verify Registered Voter by this name at this address
Page 10 - Line 3 - Unable to Verify Registered Voter by this name at this address
Page 10 - Line 4 - Unable to Verify Registered Voter by this name at this address
Page 10 - Line 5 - Printed. No Signature.
Page 10 - Line 9 - Printed. No Signature.
Page 10 - Line 10 - Printed. No Signature.
Page 11 - Line 1 - Printed. No Signature. Unable to Verify Registered Voter by this name at this address
Page 11 - Line 2 - Printed. No Signature. Unable to Verify Registered Voter by this name at this address

Page 11 - Line 3 - Printed. No Signature. Unable to Verify Registered Voter by this name at this address
Page 11 - Line 4 - Printed. No Signature.
Page 11 - Line 5 - Printed. No Signature. Unable to Verify Registered Voter by this name at this address
Page 11 - Line 6 - Unable to Verify Registered Voter by this name at this address
Page 11 - Line 7 - Printed. No Signature. Unable to Verify Registered Voter by this name at this address
Page 11 - Line 8 - Printed. No Signature. Unable to Verify Registered Voter by this name at this address
Page 11 - Line 10 - Unable to Verify Registered Voter by this name at this address
Page 12 - Line 2 - Unable to Verify Registered Voter by this name at this address
Page 12 - Line 7 - Unable to Verify Registered Voter by this name at this address
Page 14 - Line 10 - Not in District. Listed Address in Aurora.
Page 17 - Line 1 - Unable to Verify Registered Voter by this name at this address
Page 17 - Line 4 - Printed. No Signature.
Page 17 - Line 6 - Printed. No Signature.
Page 17 - Line 8 - Unable to Verify Registered Voter by this name at this address
Page 18 - Line 2 - Unable to Verify Registered Voter by this name at this address
Page 20 - Line 1 - Duplicate Signature with Page 17, Line 7
Page 20 - Line 9 - Unable to Verify Registered Voter by this name at this address
Page 20 - Line 10 - Unable to Verify Registered Voter by this name at this address
Page 22 - Line 2 - Not in District. Listed Address in Plainfield.
Page 26 - Line 5 - Unable to Verify Registered Voter by this name at this address
Page 27 - Line 6 - Printed. No Signature.
Page 29 - Line 1 - Unable to Verify Registered Voter by this name at this address
Page 29 - Line 3 - Unable to Verify Registered Voter by this name at this address
Page 29 - Line 9 - Unable to Verify Registered Voter by this name at this address
Page 30 - Line 3 - Unable to Verify Registered Voter by this name at this address
Page 30 - Line 5 - Printed. No Signature. Unable to Verify Registered Voter by this name at this address.
Page 30 - Line 6 - Printed. No Signature. Unable to Verify Registered Voter by this name at this address.
Page 30 - Line 7 - Printed. No Signature.
Page 31 - Line 2 - Not in District. Listed Address in Plainfield.
Page 31 - Line 3 - Printed. No Signature.
Page 31 - Line 8 - Not in District. Listed Address in Aurora.
Page 33 - Line 1 - Unable to Verify Registered Voter by this name at this address
Page 33 - Line 3 - Not in District. Listed Address is Unincorporated.
Page 33 - Line 4 - Not in District. Listed Address is Unincorporated.
Page 33 - Line 8 - Unable to Verify Registered Voter by this name at this address
Page 34 - Line 3 - Printed. No Signature.
Page 35 - Line 5 - Not in District. Listed Address in Aurora.
Page 36 - Line 4 - Incomplete Address

Page 36 - Line 5 - Incomplete Address
Page 36 - Line 6 - Incomplete Address
Page 36 - Line 7 - Incomplete Address
Page 36 - Line 8 - Incomplete Address
Page 36 - Line 9 - Incomplete Address
Page 37 - Line 8 - Unable to Verify Registered Voter by this name at this address
Page 37 - Line 9 - Unable to Verify Registered Voter by this name at this address
Page 39 - Line 1 - Unable to Verify Registered Voter by this name at this address
Page 39 - Line 2 - Printed. No Signature.
Page 39 - Line 3 - Printed. No Signature.
Page 39 - Line 4 - Printed. No Signature.
Page 39 - Line 7 - Printed. No Signature.
Page 40 - Line 3 - Not in District. Listed Address in Aurora.
Page 40 - Line 4 - Not in District. Listed Address in Aurora.
Page 40 - Line 8 - Unable to Verify Registered Voter by this name at this address
Page 41 - Line 8 - Not in District. Listed Address in Montgomery.
Page 43 - Line 6 - Unable to Verify Registered Voter by this name at this address
Page 44 - Line 7 - Unable to Verify Registered Voter by this name at this address
Page 45 - Line 1 - Printed. No Signature.
Page 45 - Line 2 - Printed. No Signature.
Page 45 - Line 3 - Printed. No Signature.
Page 45 - Line 4 - Printed. No Signature.
Page 45 - Line 5 - Unable to Verify Registered Voter by this name at this address
Page 45 - Line 6 - Unable to Verify Registered Voter by this name at this address
Page 45 - Line 10 - Printed. No Signature.
Page 46 - Line 2 - Unable to Verify Registered Voter by this name at this address
Page 46 - Line 3 - Unable to Verify Registered Voter by this name at this address
Page 49 - Line 9 - Printed. No Signature.

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

ELIZABETH A. WENDT
(seal) OFFICIAL SEAL
Notary Public - State of Illinois
My Commission Expires Jul 12, 2025

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

ELIZABETH A. WENDT
OFFICIAL SEAL
Notary Public - State of Illinois
My Commission Expires Jul 12, 2025

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

ELIZABETH A. WENDT
(seal)
OFFICIAL SEAL
Notary Public - State of Illinois
My Commission Expires Jul 12, 2025

Notary Public