

January 3, 2017

Via Facsimile, Electronic Mail and Regular Mail

Michael D. McHaney
Chief Judge's Office
221 S. 7th Street
Vandalia IL 62471

Via Hand-Delivery and Electronic Mail

Judge Allen Bennett
Fourth Judicial Circuit Court Judge
Shelby County Courthouse
301 East Main Street, P.O. Box 469
Shelbyville IL 62565

Re: Shelbyville Township Caucus Objections

Dear Chief Judge McHaney and Judge Bennett:

My name is Steve Shoaff and I am the Shelbyville Township Supervisor. Shelbyville Township received two objections to the Republican slate from their caucus. Enclosed please find those two objections. At the hearing on the objections, movant, Brad Halbrook, filed a Motion to Disqualify the Electoral Board under 10 ILCS 5/10-9, page 2. That statute requires a member of the electoral board to notify the "Chief Judge" when two or more members of the electoral board are disqualified because of the fact that they are candidates for the office with relation to which the objector's petitions are filed. The 3 member electoral board of Shelby Township consisted of 2 members who are "candidate[s] for the office with relation to which the objector's petition is filed." *Id.* I have enclosed herewith copies of the two Certificates of Nomination by Caucus, for the Republican and Democratic parties. On the Democratic slate, you will find Ron Koehler and Stanley Spesard – two members of the Electoral Board. The electoral board voted unanimously this morning to disqualify themselves from hearing the pending objections.

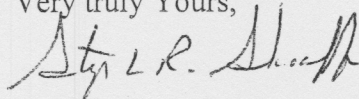
The purpose of this letter is to give notice, of the vacancies that need filled, to the "Chief Judge of the Circuit Court for the county wherein the electoral board hearing is being held." See 10 ILCS 5/10-9, page 2, enclosed herewith. We understand that the "Chief Judge of the Circuit Court" will fill the electoral board with public members of the Township by appointment, including designating the chairman of the electoral board.

As an aside, a question was broached by the public at the meeting this morning regarding who the attorney will be for the new electoral board. Enclosed please find the 6 separate pleadings filed by the two movants – Brad Halbrook and Corey Wells. Liz Nohren of Dove & Dove is counsel for Shelbyville Township and the prior electoral board asked her to be present for the hearings on objections. Attorney Nohren is leaving January 13 for 2 weeks to Hawaii. If

the new electoral board wishes to have counsel from Dove & Dove, Dustin Probst will be happy to meet with them for that representation. Otherwise, Dove & Dove continues to represent the current Township board, which is the same board slated by the Democratic Party, which is being challenged by the Republican's slated caucus. We just want Your Honors to be fully informed as to the status of the matter before moving forward, and to be sure that the new electoral board makes a decision regarding any representation by Dove & Dove or other counsel.

If you have absolutely any questions or require anything further in this matter, please feel free to contact the undersigned.

Very truly Yours,

A handwritten signature in dark ink, appearing to read "Stephen Shoaff", written in a cursive style.

Stephen Shoaff
916 West South Second Street
Shelbyville IL 62565
cellular phone: (217) 246-1240

cc: Robin Robertson, objector
Brad Halbrook, movant
Corey Wells, movant
Liz Nohren, Township counsel