



# Illinois State Board of Elections

2329 S. MacArthur Blvd  
Springfield, Illinois 62704  
217/782-4141  
Fax: 217/557-9749

## Objection Receipt

### Objection :

Objection Number: 22SOEBGP547

Objection Filed: 3/21/2022 3:23PM

Hearing Date: 3/29/2022 10:30:00AM

Electoral Board: SBE

### Objector(s) :

ALAN R. PALMER



LAURA LABARBERA



### Candidate(s) :

BRAD SCHNEIDER  
349 WOODLAND ROAD  
HIGHLAND PARK, IL 60035

10TH CONGRESS  
DEMOCRATIC

**BEFORE THE DULY CONSTITUTED ELECTORAL BOARD FOR THE  
HEARING AND PASSING UPON OF OBJECTIONS TO NOMINATION PAPERS OF  
CANDIDATES FOR THE OFFICE OF REPRESENTATIVE IN CONGRESS OF THE  
STATE OF ILLINOIS FOR THE 10<sup>TH</sup> CONGRESSIONAL DISTRICT**

LAURA LABARBERA and ALAN R. PALMER,

Petitioners-Objectors,

v.

BRAD SCHNEIDER,

Respondent-Candidate.

No.: 22 SOEBGP547

**VERIFIED OBJECTORS' PETITION**

**INTRODUCTION**

LAURA LABARBERA and ALAN R. PALMER, (the "Objectors"), for and in support of their Verified Objectors' Petition state as follows:

1. Objector LAURA LABARBERA resides at [REDACTED], in the City of Lake Forest, Lake County, Illinois 60045 in the 10<sup>th</sup> Congressional District of the State of Illinois and is a duly qualified, legal and registered voter at that address.

2. Objector ALAN R. PALMER resides at [REDACTED] in the City of Lake Forest, Lake County, Illinois 60045 in the 10<sup>th</sup> Congressional District of the State of Illinois and is a duly qualified, legal and registered voter at that address.

3. The Objectors' interest in filing this petition ("Petition") is that of voters who desire that the laws governing the filing of nomination papers for the Office of Representative in Congress of the State of Illinois for the 10<sup>th</sup> Congressional District are properly complied with and that only qualified candidates, appear on the ballot for said office.

## OBJECTIONS

4. The Objectors make the following objections to the purported nomination papers (the “Nomination Papers”) of BRAD SCHNEIDER (“Schneider” or “Candidate”) as a candidate for nomination to the office of Representative in Congress of the State of Illinois for the 10<sup>th</sup> Congressional District (the “Office”) to be voted on at the General Primary Election on June 28, 2022 (the “Election”). The Objectors state that the Nomination Papers are insufficient in fact and law for the following reasons:

5. Section 7-10 of the Illinois Election Code requires that a petition for nomination must include a statement of candidacy that:

“shall set out the address of such candidate, the office for which he is a candidate, shall state that the candidate is a qualified voter of the party to which the petition relates . . . and shall be subscribed and sworn to by such candidate by some officer authorized to take acknowledgement of deeds in the State.” 10 ILCS 5/7-10.

The statement of candidacy must be in substantially the following form:

“I, ....., being first duly sworn, say that **I reside** at .... Street in the city (or village) of ....., in the county of ....., State of Illinois; that **I am a qualified voter** therein and am a qualified primary voter of the ... party; that I am a candidate for nomination (for election in the case of committeeperson and delegates and alternate delegates) to the office of .... to be voted upon at the primary election to be held on (insert date); that I am legally qualified (including being the holder of any license that may be an eligibility requirement for the office I seek the nomination for) to hold such office and that I have filed (or I will file before the close of the petition filing period) a statement of economic interests as required by the Illinois Governmental Ethics Act and I hereby request that my name be printed upon the official primary ballot for nomination for (or election to in the case of committeepersons and delegates and alternate delegates) such office.” 10 ILCS 5/7-10 (emphasis added).

6. No person shall be entitled to be registered in and from any precinct unless such person shall by the date of the election next following have resided in the State and within the precinct 30 days and be otherwise qualified to vote at such election. 10 ILCS 5/4-2.

7. The Candidate's Statement of Candidacy states that:

"I, Brad Schneider, being first duly sworn (or affirmed), say that **I reside at 349 Woodland Road, in the City of Highland Park, Zip Code 60035**, in the County of Lake, State of Illinois; that **I am a qualified voter therein** and am a qualified primary voter of the Democratic Party; that I am a candidate for nomination to the office of Representative in Congress of the State of Illinois for the 10th Congressional District, to be voted upon at the primary election to be held on June 28, 2022; that I am legally qualified (including being the holder of any license that may be an eligibility requirement for the office I seek the nomination for) to hold such office and I hereby request that my name be printed upon the official Democratic Primary ballot for nomination for such office."

Statement of Candidacy (emphasis added).

8. The Candidate's nominating petition sheets presented to petition signers state that:

"We, the undersigned, members of and affiliated with the DEMOCRATIC Party and qualified primary electors of the DEMOCRATIC Party, in the 10TH Congressional District of the State of Illinois, do hereby petition that BRAD SCHNEIDER, **who resides at 349 Woodland Road, in the City of Highland Park, Zip Code 60035**, County of Lake and State of Illinois, shall be a candidate of the DEMOCRATIC Party for the nomination for the office of REPRESENTATIVE IN CONGRESS OF THE STATE OF ILLINOIS FOR THE 10TH CONGRESSIONAL DISTRICT, to be voted for at the primary election to be held on June 28, 2022."

Nominating Petition (emphasis added).

9. The Candidate has filed a false Statement of Candidacy and has made a false statement on each and every one of the petition signature sheets to the affect that he resides at "349 Woodland Road in the City of Highland Park, Zip Code 60035." At all times relevant, there has been no valid certificate of occupancy from the City of Highland Park. The Candidate's false representations of his residency are in violation of 10 ILCS 5/7 10, making the nomination papers invalid and the Candidate disqualified from, and ineligible to seek and serve in, the office the nomination papers are filed.

10. The Candidate has filed a false Statement of Candidacy and has made a false statement on each and every one of the petition signature sheets by stating that he is a qualified

voter at “349 Woodland Road in the City of Highland Park, Zip Code 60035.” At all times relevant, the Candidate has not resided at that address and his voter registration at that address is invalid. Such false representations as a qualified voter are in violation of 10 ILCS 5/7-10, making the nomination papers invalid and the Candidate disqualified from, and ineligible to seek and serve in, the office the nomination papers are filed.

11. For these reasons, the Candidate’s statement of candidacy and nomination petitions sheets are false and invalid. The Candidate’s name should not appear on the ballot for the office of Representative in Congress of the State of Illinois for the 10<sup>th</sup> Congressional District for the upcoming primary election.

**WHEREFORE**, the Objectors request a hearing on the objections stated herein, an examination by the Electoral Board of the official records relating to the matters alleged herein, a ruling that the Nomination Papers are invalid as not lawful, and a ruling that the name of Brad Schneider shall not appear on the ballot for nomination of the Democratic Party to the office of Representative in Congress of the State of Illinois for the 10<sup>th</sup> Congressional District for the General Primary Election on June 28, 2022.

**OBJECTORS**



By one of their attorneys

Keri-Lyn J. Krafthefer  
Daniel J. Bolin  
Amber Samuelson  
**ANCEL GLINK, P.C.**  
140 S. Dearborn #600  
Chicago, Illinois 60603  
630 399 5464  
[kkrafthefer@ancelglink.com](mailto:kkrafthefer@ancelglink.com)  
[dbolin@ancelglink.com](mailto:dbolin@ancelglink.com)  
[asamuelson@ancelglink.com](mailto:asamuelson@ancelglink.com)

STATE OF ILLINOIS) ) SS.  
COUNTY OF LAKE ) )

The undersigned, LAURA LABARBERA, upon oath deposes and says that she is one of the Objectors identified in the attached Verified Objector's Petition, that she has reviewed the allegations contained in said Petition and is familiar with the matters alleged therein, and that such allegations are true.

  
\_\_\_\_\_  
Objector

Subscribed and Sworn to before  
me by Laura LaBarbera this 21st  
Day of March, 2022.

  
\_\_\_\_\_  
NOTARY PUBLIC

(seal)

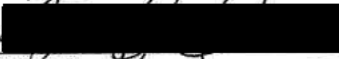


STATE OF ILLINOIS) ) SS.  
COUNTY OF LAKE )

The undersigned, ALAN R. PALMER, upon oath deposes and says that he is one of the Objectors identified in the attached Verified Objector's Petition, that he has reviewed the allegations contained in said Petition and is familiar with the matters alleged therein, and that such allegations are true.

  
\_\_\_\_\_  
Objector.

Subscribed and Sworn to before  
me by Alan R. Palmer this 21st  
Day of March, 2022.

  
\_\_\_\_\_  
NOTARY PUBLIC  
(seal)

