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No. 121472

OCT 21 2016

CLERK
SUPREME COURT
CHICAGO OFFICE

IN THE
SUPREME COURT OF ILLINOIS

MARYAM AHMAD,)
)
 Petitioner,)
)
 v.)
)
 ILLINOIS STATE BOARD OF)
 ELECTIONS, and CHICAGO BOARD OF)
 ELECTION COMMISSIONERS, and its)
 Members, MARISEL A. HERNANDEZ,)
 Chairwoman, WILLIAM J. KRESSE, &)
 JONATHAN T. SWAIN, and DAVID ORR,)
 in his official capacity as COOK COUNTY)
 CLERK, and RHONDA CRAWFORD,)
)
 Respondents.)

FILED⁰¹

OCT 21 2016

CHICAGO
SUPREME COURT CLERK

EMERGENCY MOTION FOR SUPERVISORY ORDER OR
FOR WRIT OF PROHIBITION OR MANDAMUS

For Leave to File

MARYAM AHMAD, Petitioner, by and through her attorneys, Odelson & Sterk, Ltd, and pursuant to Article VI § 4(a) of the Illinois Constitution, Illinois Supreme Court Rules 383 and 381(a) respectfully request this Court for a Supervisory Order or a Writ of Prohibition or *Mandamus*. Petitioner seeks the Supervisory Order or Writ of Prohibition or *Mandamus* to compel the Illinois State Board of Elections (“SBOE”), the Chicago Board of Elections (“CBOE”), and the Cook County Clerk (“County Clerk”), collectively, the “Election Authorities,” to remove Rhonda Crawford (“Crawford”) from the ballot of the November 8, 2016 General Election, and to suppress and not count any votes cast for her, if this Court suspends her license to practice law, or otherwise finds her not qualified to be a candidate for Judge. In support of her Motion, Petitioner

states as follows:

The Constitution of the State of Illinois broadly declares that “the general administrative and supervisory authority over all courts is vested in the Supreme Court.” *Ill. Const. 1970, art VI, § 16*. Illinois Supreme Court Rule 383 provides the requirements for a motion for supervisory order, asking the Supreme Court to invoke its supervisory authority. *Illinois Supreme Court Rule 383(a) (b)*. The Illinois Constitution also permits the Illinois Supreme Court to exercise original jurisdiction over Prohibition and *Mandamus* cases. *Ill. Const. 1970, art VI, § 4(a); Illinois Supreme Court Rule 381(a)*.

There is a great and urgent interest of the People of the State of Illinois, County of Cook, City of Chicago, and all voters in the 1st Judicial Subcircuit of Cook County, in having legally qualified judges elected. This case is extraordinary because at the time the SBOE, the CBOE, and the Cook County Clerk certified Crawford as a candidate, she was, to their knowledge, a legally qualified candidate, licensed to practice law. It was only after the certification, with the filing of the ARDC petition to suspend Crawford’s license immediately, that facts are now before this Court that jeopardize her license and ability to qualify under Article VI Section 11 of the Illinois Constitution to be a judicial candidate. Because the election is approximately 2 weeks away and early voting has already commenced, Petitioner is asking this Court to use its administrative and supervisory authority over the quasi-judicial offices of the SBOE, the CBOE, and the Cook County Clerk to remove Crawford from the ballot, or in the alternative, to suppress and not count any votes cast for her through early voting or on election day. To do so, Petitioner asks that this Court accept jurisdiction over this supervisory, prohibitive and *mandamus* action.

INTRODUCTION

Defendant Illinois State Board of Elections certified Defendant Crawford as the Democratic Candidate for Judge, Vanessa Hopkins vacancy, in the 1st Judicial Subcircuit for the November 8, 2016 General Election, after she won the March 15, 2016 primary election. (Ex. A). At the time of the certification, Defendant Crawford was a legally qualified candidate for this position since she was an attorney in good standing with the Illinois Attorney Registration and Disciplinary Commission (“ARDC”).

Defendant Election Authorities have certified Petitioner Ahmad as a Write-In Candidate for Judge, Vanessa Hopkins vacancy, in the 1st Judicial Subcircuit for the November 8, 2016 General Election. Ahmad, who is also a voter in this judicial race, is a qualified candidate for this position, an attorney in good standing with the ARDC, and currently a sitting Judge by appointment of this Court.

Defendants, CBOE and the Cook County Clerk, are the Election Authorities for the 1st Judicial Subcircuit. *10 ILCS 5/1 – 3 (8)* (West, 2016). The SBOE is the statewide election authority for state candidates, including judges. Their duties, as Election Authorities, are ministerial and includes ballot access issues, election management, and all matters related to candidates who qualify for the ballot in the City of Chicago and suburban Cook County.

On or about October 7, 2016, the ARDC charged Rhonda Crawford with a three-count misconduct complaint entitled, “*In the Matter of Rhonda Crawford*,” 2016PR00115. (Ex. B). The complaint alleges that on August 11, 2016, in Courtroom 098 of the Markham courthouse Crawford engaged in criminal conduct, conduct involving dishonesty, fraud deceit or misrepresentation, and conduct prejudicial to the administration of justice.

On October 13, 2016, the ARDC filed a *Petition for Interim Suspension* with this Court in

the case of *In the Matter of Rhonda Crawford*, Supreme Court No. M.R. 28341. (Ex. C). In their petition, the ARDC asks this Court to immediately suspend Crawford's license to practice law while the disciplinary action is pending, and to "restrain and enjoin (Crawford) from taking the judicial oath of office or assuming the office of judge, or take such other action as this Court deems just." (*See*, Ex. C, pg. 17). In addition to the facts alleged in the ARDC complaint, the ARDC informed this Court of Crawford's deceitful actions during the investigation of the allegations. "(Crawford's) lack of judgment in impersonating a judge, her subsequent dishonesty in failing to correct those who misunderstood her role, her lack of genuine remorse about the prejudice her actions have caused to the legal system, . . . and her failure to voluntarily remove her name from the judicial ballot, reflect her fundamental lack of eligibility to maintain a license to practice law." (Ex C, pg. 11). The ARDC stressed that a suspension until further Order of the Court "is required for the purposes of protecting the public, the integrity of the profession and the administration of justice." *Id.* at 17.

The Constitution of the State of Illinois provides that Judges must be licensed attorneys in the State. *Ill. Const. 1970, art VI, § 11*. If Defendant Crawford's license is suspended from the practice of law, she will not be eligible to be a judge in Illinois. A valid license to practice law requires the attorney not be disciplined for conduct relating the person's "skill, fitness or competency to practice law." *Applebaum v. Rush Univ. Med. Ctr.*, 231 Ill.2d 429, 441 (2008). In their petition, the ARDC maintains that their allegations against Crawford "alleges facts demonstrating that (Crawford) does not have the fitness, in as much as she lacks the ability to conduct herself in a manner that engenders respect for the law and the profession, the judgment, and the honesty, to maintain a valid license." (*See*, Ex. C, pg. 14).

SUPERVISORY ORDER

As a creature of statute, the Election Authorities possess only those powers conferred upon it by law. Any power or authority it exercises must find its source within the law pursuant to which it was created. *Delgado v. Board of Election Com'rs of City of Chicago*, 224 Ill.2d 481, 485 (2007). Any action or decision taken by an administrative agency in excess of, or contrary to its authority, is void. *Id.* As a general rule, the Court will not issue a supervisory order “unless the normal appellate process will not afford adequate relief and the dispute involves a matter important to the administration of justice [citation] or intervention is necessary to keep an inferior tribunal from acting beyond the scope of its authority [citation].” *Id.* at 488-489. However, even when the inferior tribunal acted within its jurisdiction, where the case presents “important issues regarding the administration of justice and direct and immediate action is necessary to ensure that the Election Board adheres to the law and that any challenge to its decision in the circuit court comports with controlling principles of judicial review.” *Id.* at 489. In *Delgado*, this Court considered the eligibility of a convicted felon who attempted to run for the office of alderman in the City of Chicago. *Id.* at 482. This Court, in exercising its supervisory authority, recognized that the Election Board exceeded its authority and ordered a vacation of the Election Board’s order and to declare the candidate ineligible to run for office; “reject their nomination papers and remove names from the ballot or discount any votes cast for them.” *Id.* at 489.

Here, the SBOE, the CBOE and the County Clerk, initially certified the candidacy of Crawford. Notably, at the time that she was certified, Crawford had committed most of the dishonest acts which are now the basis for the disciplinary action. It wasn’t until more than a month later, a month closer to the election, that the ARDC made the allegations public. Based on these allegations, this Court now has been asked to immediately suspend her license to practice

law and enjoin her from taking the judicial oath of office or assuming the office of judge. With the election looming, there simply is no time to go through the normal judicial process of removing her from the ballot. It is critical this Court resolve this issue, which is the cornerstone of our judicial system, and goes to the very heart of the administration of justice. If this Court acts on the Petition filed by the ARDC and suspends Crawford as a licensed attorney, she will not be qualified to be a judge. The Court's intervention is necessary to keep the Election Authorities from now acting beyond the scope of its authority – counting votes for a candidate who will no longer be qualified for the office which she seeks.

If Crawford's license is suspended pursuant to the ARDC request, then it is respectfully requested that this Court use its Supervisory Authority to order the Election Authorities to remove Rhonda Crawford from the ballot and/or suppress and not count any votes already cast for her, or to be cast, at the November 8, 2016 election.

WRIT OF PROHIBITION

A Writ of Prohibition is an extraordinary judicial process whereby a superior court may prevent inferior tribunals or persons from exercising a jurisdiction with which they have not been vested by law. For a Writ of Prohibition to be issued, the action to be prohibited must be judicial or quasi-judicial in nature; the jurisdiction of the tribunal against which the Writ is sought must be inferior to that of the issuing court; the action to be prohibited must be either outside the tribunal's jurisdiction or, if within its jurisdiction, beyond its legitimate authority; and the petitioner must be without any other adequate remedy. *People ex rel. No. 3 J.&E. Discount, Inc., v. Whitler*, 81 Ill.2d 473, 479-480 (1980); *Orenic v. Illinois State Labor Relations Board*, 127 Ill. 2d 453, 468 (1989). Actions of an administrative official, such as a director and a hearing officer, may be sufficiently judicial in nature to be subject to a Writ of Prohibition. *Orenic*, at 468.

Where the relief sought is prohibitory in nature, regardless of whether the Administrative agency has the duty or authority to act in accordance with a Writ of *Mandamus*, a Writ of Prohibition is an appropriate vehicle for awarding relief. *Id.* at 458-459. In addition, even where there are no allegations that the administrative official failed to perform an official duty, a Writ of Prohibition is appropriate where the action seeks to bar the official from performing an act, such as placing an initiative on the ballot. *Chicago Bar Association v. Illinois State Board of Elections*, 161 Ill.2d 502 (1994).

Delay in completion of administrative proceedings can lead to irreparable harm under some circumstances and is subject to a Writ of Prohibition. In *Orenic* a union petitioned the Labor Relations Board for an election to determine whether the union could represent court employees whom the union alleged were jointly employed by the county and the chief judge of the trial court. The chief judge petitioned the Supreme Court for a writ to prohibit the Board from certifying any bargaining unit which listed the county as a joint employer of judicial branch employees. *Orenic*, 127 Ill.2d at 459. This Court found that the chief judge showed that administrative review would not provide an adequate remedy.

The first element to be established is that the action sought to be prohibited is judicial or quasi-judicial in nature. The action sought is the removal of Crawford as a legal candidate and the suppression of any votes cast for her at the November 8, 2016 election. Both of these actions require judicial action and are not within the province of the Election Authorities. This Court is certainly superior to the tribunals who administer the ballot and voting mechanism in Illinois. Removal of Crawford from the ballot and the suppression of any votes cast for her is beyond the legitimate authority of the Elections Authorities, unless ordered by this Court. Petitioner Ahmad has no other remedy since the election is only 18 days away and no relief is available through the

administrative agencies or the lower courts.

WRIT OF MANDAMUS

A Writ of *Mandamus* commands a public official to perform some ministerial, nondiscretionary duty. *Doe v. Carlson*, 250 Ill. App. 3d 570 (2nd Dist, 1993). Mandamus will also be entertained, “in order to expunge a decision which an election board lacked jurisdiction to enter.” *Coldwell v. Nolan*, 167 Ill.App. 3d 1057 (1st Dist, 1988). To obtain *mandamus* relief, a party must show a clear, affirmative right to the requested relief, a clear duty of the defendant to act, and clear authority in the defendant to comply with the writ. *Lewis E. v. Spagnolo*, 186 Ill.2d 198 (1999) A court should issue a Writ of *Mandamus* where the “applicant has a legal right to its performance and can prove that a defendant has a legal obligation to act.” *Batka v. Board of Trustees of the Village of Orland Park Police Pension Fund*, 227 Ill.App.3d 735. A petitioner need not establish that she/he demanded action from a public official and the official refused as a prerequisite to mandamus where, as here, the enforcement of a public right is at stake. *Weisberg v. Byrne*, 92 Ill.App.3d 780, 785 (1st Dist., 1981).

Petitioner and other voters are entitled to be able to vote for a legally qualified candidate for Judge in the 1st Judicial Subcircuit. The allegations contained in the ARDC petition before this Court, which are substantiated by affidavits, court reported statements and other evidence, demonstrate that Crawford does not have the fitness or competency to practice law, let alone be a judge. Therefore, this Petitioner requests that if this Court suspends Crawford’s license to practice law pursuant to the request by the ARDC, then this Court shall direct the Election Authorities to remove her from the November 8, 2016 ballot, or in the alternative, suppress and not count any votes previously cast, or to be cast, at the November 8, 2016 election.

**CONTINUED IRREPARABLE HARM TO THE PUBLIC,
THE LEGAL PROFESSION, AND THE ORDERLY ADMINISTRATION OF JUSTICE**

Just as this Motion and Complaint were being completed, Rhonda Crawford was indicted by the Cook County State's Attorney and charged with Official Misconduct, a Class 3 felony, and False Impersonation, a Class A misdemeanor. While it is true that a Defendant is innocent until proven guilty, the allegations against Crawford have, in large part, been admitted. The admissions made to the ARDC (*See, Ex. C*), separate and apart from a criminal prosecution, are certainly damning as to the Rules of Conduct and the violations raised by the ARDC. In a further showing of no remorse and continued misrepresentation of the truth, Crawford, through her attorneys, issued a "Media Alert," blaming everyone but Crawford for her current situation. (*Ex. D*). In the "Media Alert," Crawford alleges the Democratic Party "is funding a prominent election attorney to work against Crawford." Counsel for Ahmad is the only election attorney working on Ahmad's behalf. He has not received any monies – nor been contacted by any "Democratic" official regarding these matters. The statement made by Crawford, through her attorneys, is a total falsehood. Many other statements are also false in the Media Alert, but counsel for Ahmad can speak to the allegations regarding attorney's fees, firsthand.

CONCLUSION

The basic, fundamental, core concepts of the judicial systems are at stake in this cause. If allowed to remain on the ballot, Rhonda Crawford will be elected Judge on November 8, 2016. Although Maryam Ahmad has secured a write-in position, it is a virtual impossibility for a write-in to defeat an opponent who is on the ballot in a large geographical election district. Thus, Illinois will again be embarrassed, throughout the world, this time by electing a lawyer under criminal indictment and facing disciplinary proceedings and possible disbarment or suspension by the ARDC and this Court.

The circumstances alleged are unique and disheartening. The admissions by Crawford to date are incriminating. This Court has acted, in the past, through its Supervisory Orders, to insure that the sanctity and administration of the judicial system is preserved.

It is that time, again.

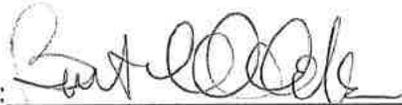
WHEREFORE, the Petitioner respectfully requests and suggests the Court enter the following:

1. A Supervisory Order that Rhonda Crawford be removed, as a legally qualified candidate, from the November 8, 2016 election ballot, and any votes cast for Rhonda Crawford be suppressed and not counted; or
3. Leave to file a Complaint for Writ of Prohibition or *Mandamus* be granted; and
4. For any other relief as justice requires.

Dated this 21st day of October, 2016.

Respectfully submitted,

MARYAM AHMAD, Petitioner

By: 
Burton S. Odelson, one of her Attorneys

Burton S. Odelson, #2090457
Mary Ryan Norwell, #6186978
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 JONATHAN T. SWAIN, and DAVID ORR,)
 in his official capacity as COOK COUNTY)
 CLERK, and RHONDA CRAWFORD,)
)
 Respondents.)

**AFFIDAVIT OF BURTON S. ODELSON
PURSUANT TO ILLINOIS SUPREME COURT RULE 311(b)**

I, BURTON S. ODELSON, being duly sworn and if called to testify would affirmatively state from my personal knowledge as follows:

1. I am an attorney in good standing, licensed to practice law by the Supreme Court of Illinois.
2. I am competent to testify to the matters stated in this affidavit based on my own personal knowledge.
3. I am one of the attorneys of record for the Petitioner, Maryam Ahmad. I served as counsel for the Petitioner before the Honorable Alfred Paul of the Circuit Court of the Cook County in the case of *Maryam Ahmad v. Chicago Board of Election Commissioners, et al./Rhonda*

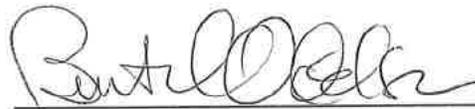
Crawford v. Chicago Board of Election Commissioners, et al., 2016 COEL 000019.

4. Expedited proceedings are necessary in this matter given the limited time between now and the General Election.

5. If the matter is not resolved prior to the election, some voters may be disenfranchised by voting for an ineligible candidate.

6. I have read the Plaintiff's Emergency Motion for Supervisory Order or for Writ of Prohibition or *Mandamus*, and incorporate same herein as if set forth in this Affidavit verbatim.

FURTHER AFFIANT SAYETH NAUGHT.



Burton S. Odelson

Subscribed and Sworn to before me
this 21st day of October, 2016.


NOTARY PUBLIC

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 JONATHAN T. SWAIN, and DAVID ORR,))
 in his official capacity as COOK COUNTY)
 CLERK, and RHONDA CRAWFORD,)
)
 Defendants.)

COMPLAINT FOR WRIT OF PROHIBITION OR MANDAMUS

NOW COMES MARYAM AHMAD, Plaintiff, by and through her attorneys, Odelson & Sterk, Ltd, and complains of the Defendants as follows:

JURISDICTION

1. This Court has jurisdiction over original actions for Writs of Prohibition and Mandamus pursuant to Article VI § 4(a) of the Illinois Constitution, Illinois Supreme Court Rules 383 and 381(a) to compel the Illinois State Board of Elections (“SBOE”), the Chicago Board of Elections (“CBOE”), and the Cook County Clerk (“County Clerk”), collectively, the “Election Authorities,” to remove Rhonda Crawford (“Crawford”) from the ballot of the November 8, 2016 General Election, and to suppress and not count any votes cast for her, if this Court suspends her license to practice law.

2. The Constitution of the State of Illinois broadly declares that “the general administrative and supervisory authority over all courts is vested in the Supreme Court.” *Ill. Const. 1970, art VI, § 16*. Illinois Supreme Court Rule 383 provides the requirements for a motion for supervisory order, asking the Supreme Court to invoke its supervisory authority. *Illinois Supreme Court Rule 383(a) (b)*. The Illinois Constitution also permits the Illinois Supreme Court to exercise original jurisdiction over Prohibition and *Mandamus* cases. *Ill. Const. 1970, art VI, § 4(a)*; *Illinois Supreme Court Rule 381(a)*.

THE PARTIES

3. Defendants, CBOE and the Cook County Clerk, are the Election Authorities for the 1st Judicial Subcircuit. *10 ILCS 5/1 – 3 (8)* (West, 2016). The SBOE is the statewide election authority for state candidates, including judges. Their duties, as Election Authorities, are ministerial and includes ballot access issues, election management, and all matters related to candidates who qualify for the ballot in the City of Chicago and suburban Cook County.

4. Defendant Crawford is the Democratic Candidate for Judge, Vanessa Hopkins vacancy, in the 1st Judicial Subcircuit for the November 8, 2016 General Election, after she won the March 15, 2016 primary election. At the time of the certification, Defendant Crawford was a legally qualified candidate for this position since she was an attorney in good standing with the Illinois Attorney Registration and Disciplinary Commission (“ARDC”).

5. Defendant Election Authorities have certified Plaintiff Ahmad as a Write-In Candidate for Judge, Vanessa Hopkins vacancy, in the 1st Judicial Subcircuit for the November 8, 2016 General Election. Ahmad, who is also a voter in this judicial race, is a qualified candidate for this position, an attorney in good standing with the ARDC, and currently a sitting Judge by appointment of this Court.

INTRODUCTION

6. There is a great and urgent interest of the people of the State of Illinois, County of Cook, City of Chicago, and all voters in the 1st Judicial Subcircuit of Cook County, in having legally qualified judges elected. This case is extraordinary because at the time the SBOE, the CBOE, and the Cook County Clerk certified Crawford as a candidate, she was, to their knowledge, a legally qualified candidate, licensed to practice law. It was only after the certification, with the filing of the ARDC petition to suspend Crawford license immediately, that facts are now before this Court that jeopardize her license and ability to qualify under Article VI Section 11 of the Illinois Constitution to be a judicial candidate. Because the election is approximately 2 weeks away and early voting has already commenced, Plaintiff is asking this Court to use its administrative and supervisory authority over the quasi-judicial offices of the SBOE, the CBOE, and the Cook County Clerk to remove Crawford from the ballot, or in the alternative, to suppress and not count any votes cast for her through early voting or on election day.

7. On or about October 7, 2016, the ARDC charged Rhonda Crawford with a three-count misconduct complaint entitled, "*In the Matter of Rhonda Crawford*," 2016PR00115. (Motion Ex. B). The complaint alleges that on August 11, 2016, in Courtroom 098 of the Markham courthouse Crawford engaged in criminal conduct, conduct involving dishonesty, fraud, deceit or misrepresentation, and conduct prejudicial to the administration of justice.

8. On October 13, 2016, the ARDC filed a *Petition for Interim Suspension* with this Court in the case of *in the Matter of Rhonda Crawford*, Supreme Court No. M.R. 28341. (Motion Ex. C). In their petition, the ARDC asks this Court to immediately suspend Crawford's license to practice law while the disciplinary action is pending, and to "restrain and enjoin (Crawford) from taking the judicial oath of office or assuming the office of judge, or take such other action as this

Court deems just.” (See, Motion Ex. C, pg. 17). In addition to the facts alleged in the ARDC complaint, the ARDC informed this Court of Crawford’s deceitful actions during the investigation of the allegations. “(Crawford’s) lack of judgment in impersonating a judge, her subsequent dishonesty in failing to correct those who misunderstood her role, her lack of genuine remorse about the prejudice her actions have caused to the legal system, . . . and her failure to voluntarily remove her name from the judicial ballot, reflect her fundamental lack of eligibility to maintain a license to practice law.” (See, Motion Ex. C, pg. 11). The ARDC stressed that a suspension until further Order of the Court “is required for the purposes of protecting the public, the integrity of the profession and the administration of justice.” *Id.* at 16.

9. The Constitution of the State of Illinois provides that Judges must be licensed attorneys in the State. *Ill. Const. 1970, art VI, § 11*. If Defendant Crawford’s license is suspended from the practice of law, she will not be eligible to be a judge in Illinois. A valid license to practice law requires the attorney not be disciplined for conduct relating the person’s “skill, fitness or competency to practice law.” *Applebaum v. Rush Univ. Med. Ctr.*, 231 Ill.2d 429, 441 (2008). In their petition, ARDC maintains that their allegations against Crawford “alleges facts demonstrating that (Crawford) does not have the fitness, in as much as she lacks the ability to conduct herself in a manner that engenders respect for the law and the profession, the judgment, and the honesty, to maintain a valid license.” (See, Motion Ex. C, p. 14)

WRIT OF PROHIBITION

10. Plaintiff incorporates Paragraphs 1-9 herein by reference.

11. A Writ of Prohibition is an extraordinary judicial process whereby a superior court may prevent inferior tribunals or persons from exercising a jurisdiction with which they have not been vested by law. For a Writ of Prohibition to be issued, the action to be prohibited must be

judicial or quasi-judicial in nature; the jurisdiction of the tribunal against which the Writ is sought must be inferior to that of the issuing court; the action to be prohibited must be either outside the tribunal's jurisdiction or, if within its jurisdiction, beyond its legitimate authority; and the Plaintiff must be without any other adequate remedy. *People ex rel. No. 3 J.&E. Discount, Inc., v. Whitler*, 81 Ill.2d 473, 479-480 (1980); *Orenic v. Illinois State Labor Relations Board*, 127 Ill. 2d 453, 468 (1989). Actions of an administrative official, such as a director and a hearing officer, may be sufficiently judicial in nature to be subject to a Writ of Prohibition. *Orenic*, at 468.

12. Where the relief sought is prohibitory in nature, regardless of whether the Administrative agency has the duty or authority to act in accordance with a Writ of *Mandamus*, a Writ of Prohibition is an appropriate vehicle for awarding relief. *Id.* at 458-459. In addition, even where there are no allegations that the administrative official failed to perform an official duty, a Writ of Prohibition is appropriate where the action seeks to bar the official from performing an act, such as placing an initiative on the ballot. *Chicago Bar Association v. Illinois State Board of Elections*, 161 Ill.2d 502 (1994).

13. Delay for completion of administrative proceedings can lead to irreparable harm under some circumstances and is subject to a Writ of Prohibition. In *Orenic* a union petitioned the Labor Relations Board for an election to determine whether the union could represent court employees whom the union alleged were jointly employed by the county and the chief judge of the trial court. The chief judge petitioned the Supreme Court for a writ to prohibit the Board from certifying any bargaining unit which listed the county as a joint employer of judicial branch employees. *Orenic*, 127 Ill.2d at 459. This Court found that the chief judge showed that administrative review would not provide an adequate remedy.

14. The first element to be established is that the action sought to be prohibited is

judicial or quasi-judicial in nature. The action sought is the removal of Crawford as a legal candidate and the suppression of any votes cast for her at the November 8, 2016 election. Both of these actions require judicial action and are not within the province of the Election Authorities. This Court is certainly superior to the tribunals who administer the ballot and voting mechanism in Illinois. Removal of Crawford from the ballot and the suppression of any votes cast for her is beyond the legitimate authority of the Elections Authorities, unless ordered by this Court. Plaintiff Ahmad has no other remedy since the election is only 18 days away and no relief is available through the administrative agencies or the lower courts.

WRIT OF MANDAMUS

15. Plaintiff incorporates Paragraphs 1-14 herein by reference.

16. A Writ of *Mandamus* commands a public official to perform some ministerial, nondiscretionary duty. *Doe v. Carlson*, 250 Ill. App. 3d 570 (2nd Dist, 1993). Mandamus will also be entertained, “in order to expunge a decision which an election board lacked jurisdiction to enter.” *Coldwell v. Nolan*, 167 Ill.App. 3d 1057 (1st Dist, 1988). To obtain *mandamus* relief, a party must show a clear, affirmative right to the requested relief, a clear duty of the defendant to act, and clear authority in the defendant to comply with the writ. *Lewis E. v. Spagnolo*, 186 Ill.2d 198 (1999) A court should issue a Writ of *Mandamus* where the “applicant has a legal right to its performance and can prove that a defendant has a legal obligation to act.” *Batka v. Board of Trustees of the Village of Orland Park Police Pension Fund*, 227 Ill.App.3d 735. A Plaintiff need not establish that she/he demanded action from a public official and the official refused as a prerequisite to mandamus where, as here, the enforcement of a public right is at stake. *Weisberg v. Byrne*, 92 Ill.App.3d 780, 785 (1st Dist., 1981). Though *mandamus* is extraordinary, we may consider a petition for the writ when it presents an issue that is novel and of crucial importance to

the administration of justice, even if all the normal requirements for the writ's award are not met initially. *Knuepfer v. Fawell*, 96 Ill.2d 284, 291 (1983); *Orenic, supra* at 462.

17. Plaintiff and other voters are entitled to be able to vote for a legally qualified candidate for Judge in the 1st Judicial Subcircuit. The allegations contained in the ARDC petition before this Court, which are substantiated by affidavits, court reported statements and other evidence, demonstrate that Crawford does not have the fitness or competency to practice law, let alone be a judge. Therefore, this Plaintiff requests that if this Court suspends Crawford's license to practice law pursuant to the request by the ARDC, then this Court shall direct the Election Authorities to remove her from the November 8, 2016 ballot, or in the alternative, suppress and not count any votes previously cast, or to be cast, at the November 8, 2016 election.

CONCLUSION

The basic, fundamental, core concepts of the judicial systems are at stake in this cause. If allowed to remain on the ballot, Rhonda Crawford will be elected Judge on November 8, 2016. Although Maryam Ahmad has secured a write-in position, it is a virtual impossibility for a write-in to defeat an opponent who is on the ballot. Thus, Illinois will again be embarrassed, throughout the world, as electing a lawyer under criminal indictment and facing disciplinary proceedings and possible disbarment or suspension by the ARDC and this Court.

The circumstances alleged are unique and disheartening. The admissions by Crawford to date are incriminating. This Court has acted, in the past, through its Supervisory Orders, to insure that the sanctity and administration of the judicial system is preserved.

It is that time, again.

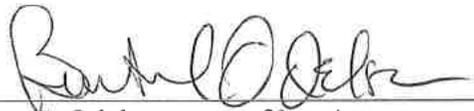
WHEREFORE, for the foregoing reason, Plaintiff respectfully requests that this Court enter a Writ of Prohibition or *Mandamus* ordering the following:

1. Rhonda Crawford be removed, as a legally qualified candidate, from the November 8, 2016 election ballot;
2. That any votes cast for Rhonda Crawford be suppressed and not counted; and
3. For any other relief as justice requires.

Dated this 21st day of October, 2016.

Respectfully submitted,

MARYAM AHMAD, Plaintiff

By: 
Burton S. Odelson, one of her Attorneys

Burton S. Odelson, #2090457
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VERIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that he has read the Complaint for a Writ of Prohibition or *Mandamus* and the statements set forth therein are true and correct, except as to matter therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.



Burton S. Odelson

Subscribed and Sworn to before me
this 21st day of October, 2016.



NOTARY PUBLIC



GENERAL ELECTION CERTIFICATE

REVISED 08/29/2016 11:40 AM

UNITED STATES OF AMERICA,)
) SS. OFFICE OF THE STATE BOARD OF ELECTIONS
STATE OF ILLINOIS)
)

To the County Clerk of COOK County:

We, the undersigned, Members of the State Board of Elections, of the State of Illinois, pursuant to law, do hereby certify that the following is a full, true and correct list of the names of all persons nominated to office, as specified in the certifications of nomination and nomination papers filed in the office of the State Board of Elections, to be voted for by the electors at the General Election to be held on Tuesday, the 8th day of November, 2016, in the county of COOK:

FOR PRESIDENT AND VICE PRESIDENT OF THE UNITED STATES

(Vote for one)

DEMOCRATIC	(HILLARY RODHAM CLINTON (TIMOTHY MICHAEL KAINE
REPUBLICAN	(DONALD J. TRUMP (MICHAEL R. PENCE
LIBERTARIAN	(GARY JOHNSON (BILL WELD
GREEN	(JILL STEIN (AJAMU BARAKA

FOR UNITED STATES SENATOR

(Vote for one)

DEMOCRATIC	TAMMY DUCKWORTH
REPUBLICAN	MARK STEVEN KIRK
LIBERTARIAN	KENTON McMILLEN
GREEN	SCOTT SUMMERS



FOR JUDGE OF THE CIRCUIT COURT
 COOK COUNTY JUDICIAL CIRCUIT
 FIRST SUBCIRCUIT
 (To fill the vacancy of the Hon. Vanessa A. Hopkins)
 (Vote for one)

DEMOCRATIC	RHONDA CRAWFORD
REPUBLICAN	No Candidate

FOR JUDGE OF THE CIRCUIT COURT
 COOK COUNTY JUDICIAL CIRCUIT
 SECOND SUBCIRCUIT
 (To fill the vacancy of the Hon. Drella Savage)
 (Vote for one)

DEMOCRATIC	D. RENEE JACKSON
REPUBLICAN	No Candidate

FOR JUDGE OF THE CIRCUIT COURT
 COOK COUNTY JUDICIAL CIRCUIT
 FOURTH SUBCIRCUIT
 (To fill the vacancy of the Hon. William J. Kunkle)
 (Vote for one)

DEMOCRATIC	EDWARD J. KING
REPUBLICAN	No Candidate

FOR JUDGE OF THE CIRCUIT COURT
 COOK COUNTY JUDICIAL CIRCUIT
 FIFTH SUBCIRCUIT
 (To fill the vacancy of the Hon. Loretta Eadie-Daniels)
 (Vote for one)

DEMOCRATIC	LEONARD MURRAY
REPUBLICAN	No Candidate

FILED

OCT - 7 2016

BEFORE THE HEARING BOARD
OF THE
ILLINOIS ATTORNEY REGISTRATION
AND
DISCIPLINARY COMMISSION

**ATTY REG & DISC COMM
CHICAGO**

In the Matter of:

RHONDA CRAWFORD,

Attorney-Respondent,

No. 6281226.

Commission No.

2016PR00115

COMPLAINT

Jerome Larkin, Administrator of the Attorney Registration and Disciplinary Commission, by his attorney, Wendy J. Muchman and Shelley M. Bethune, pursuant to Supreme Court Rule 753(b) complains of Respondent, Rhonda Crawford, who was licensed to practice law in Illinois on November 6, 2003, and alleges that Respondent has engaged in the following conduct, which subjects Respondent to discipline pursuant to Supreme Court Rule 770:

COUNT I

(Dishonesty as a result of handling cases on a judge's call while dressed in judicial robes and seated on the judge's chair behind the bench)

1. From August 2011 to August 2016, Respondent was employed as a Law Clerk/Staff Attorney for Office of the Chief Judge of the Circuit Court of Cook County. From August 2011 until May 2015, Respondent worked at the Daley Center Courthouse and was responsible for research and writing assignments given to her by Chief Judge Timothy Evans. In May 2015, Respondent was transferred to the Markham Courthouse in the Sixth Municipal District ("Markham"), where she maintained her position as Law Clerk/Staff Attorney and was responsible for research and writing assignments given to her by any of the judges at Markham. Judge Marjorie Laws ("Judge Laws"), the presiding judge in Markham, was Respondent's



supervisor at Markham.

2. At no time has Respondent held the office of Judge or Associate Judge in Illinois pursuant to Article VI of the 1970 Illinois Constitution. As a result, at no time was Respondent authorized to act as a Judge or Associate Judge in a Circuit Court of this State of Illinois.

3. In March 2016, Respondent won the primary election for the office of judge in the Circuit Court of Cook County, First Judicial Subcircuit. Respondent is currently unopposed on the general election ballot for November 2016. Subsequent to winning the primary election, Respondent began observing judges at Markham during their court calls in preparation for the likely possibility that she would be elected to the office of judge in November 2016.

4. On August 11, 2016, Judge Valarie Turner ("Judge Turner") was assigned to Courtroom 098 in Markham ("Courtroom 098") for court calls scheduled to begin at 9:00 a.m., 10:30 a.m., and 1:00 p.m. On August 11, each of the three court calls involved traffic tickets that had been issued in the Village of Dolton. The Village of Dolton prosecutor working in Courtroom 098 that day was Luciano Panici, Jr. ("Panici, Jr.").

5. On August 11, 2016, at approximately 9:00 a.m., Respondent was seated in the witness box to the left of the judge's bench in Courtroom 098. Shortly thereafter, Judge Turner entered Courtroom 098 wearing her judicial robe, took the bench, and began the 9:00 a.m. call. Respondent remained seated in the witness box throughout the 9:00 a.m. and 10:30 a.m. calls, between which there was no recess.

6. At approximately 12:00 p.m., the court recessed for lunch. At that time, Judge Turner introduced Respondent to Panici, Jr. and asked, "Have you met Judge Crawford?" Respondent did not correct Judge Turner's statement that she was a judge. Panici, Jr. introduced himself to Respondent and left Courtroom 098.

7. Judge Turner's statement that Respondent was a judge in paragraph six, above, was false because Respondent was not a judge on August 11, 2016, nor has she ever been a judge.

8. Respondent knew that Judge Turner's statement in paragraph six, above, was false because she knew she was not a judge. Respondent's failure to correct Judge Turner's statement in paragraph six, above, was dishonest and misleading.

9. At approximately 1:00 p.m., Panici, Jr. returned to Courtroom 098 for the afternoon call beginning at 1:00 p.m. At that time, Officer Derrell White also arrived at Courtroom 098 for the afternoon call. Officer White sat in a chair in a row of chairs located to the left of and slightly behind the witness box. Respondent again sat in the witness box to the left of the judge's bench. Judge Turner began the afternoon call at approximately 1:00 p.m.

10. At some time near the end of the 1:00 p.m. call, Judge Turner announced to the people in Courtroom 098, "We're going to switch judges" and gave her judicial robe to Respondent. Respondent did not correct Judge Turner's reference to her as a judge and put on Judge Turner's robe in plain view of the people in Courtroom 098.

11. Judge Turner's reference to Respondent as a judge in paragraph ten, above, was false because Respondent was not a judge on August 11, 2016, nor has she ever been a judge.

12. At the time Judge Turner referred to Respondent as a judge in paragraph ten, above, Respondent knew Judge Turner's statement was false because she knew she was not a judge. Respondent's failure to correct Judge Turner's reference to her as a judge in front of the people in Courtroom 098 was dishonest and misleading.

13. After putting on Judge Turner's robe, Respondent sat down on the bench and began purporting to preside over at least three cases on the 1:00 p.m. call. Judge Turner stood

behind Respondent.

14. As a result of Judge Turner's previous introduction of Respondent, at the time Respondent put on Judge Turner's robe and began purporting to preside over cases, Panici Jr. believed Respondent was a judge.

15. After Respondent had put on Judge Turner's robe and sat on the bench, the court clerk called the case of defendant Maliq Giles ("Giles"), ticket YE-334-458. At Giles' request, Respondent purported to continue the matter until October 26, 2016. Respondent reflected her purported decision by writing "MD 10-26-16" on the back of ticket YE-334-458.

16. After Giles' matter, the court clerk called the case of defendant Angel LaSalle ("LaSalle"), ticket YE-334-458. When LaSalle stepped up to the bench, Respondent said to LaSalle, "Officer is not in court." Panici, Jr. then made a motion to continue the matter. Respondent turned to Judge Turner and asked, "Can I deny his motion?" Judge Turner replied, "Yes, you can deny the motion" and Respondent purported to deny the motion. Panici, Jr. then made a motion to non-suit the matter, which Respondent purported to grant. Respondent then reflected her purported decision by writing "ONIC" (Officer Not In Court) and "MCNS" (Motion City Non-Suit) on the back of ticket YE-334-458.

17. At some point while Respondent was wearing Judge Turner's robe and seated on the bench, she called the case of defendant Kendrah Blackshear ("Blackshear"), ticket YE-250-620. Blackshear stepped up to the bench before Respondent and presented a valid driver's license. Panici, Jr. made a motion to non-suit the matter and Respondent purported to grant the motion.

18. At the time Blackshear stepped up in front of Respondent, described in paragraph 17, above, Blackshear believed Respondent was a judge as a result of the facts that Respondent

was wearing a judicial robe, sitting behind the bench in the Judge's chair, and presiding over cases being called by the clerk.

19. After the 1:00 p.m. call concluded, Respondent returned Judge Turner's judicial robe to her. At that time, Officer White approached Respondent to congratulate her on her judgeship. Officer White asked Respondent if she would be assigned to Markham and Respondent replied that she was in Markham now but would probably be assigned downtown.

20. Respondent's statement to Officer White referenced in paragraph 19, above, was false and misleading because she was not a judge assigned to Markham on August 11, 2016.

21. Respondent knew that her statement to Officer White referenced in paragraph 19, above, was false and misleading because she knew she was not a judge assigned to Markham.

22. After being apprised of what had occurred, Judge Laws conducted an investigation of Respondent's conduct. As a result of that investigation, Judge Laws placed all three tickets referred to in paragraphs 15-17, above, back on the court's docket. On September 1, 2016, Judge Laws heard all three matters, tickets YE-334-458 (Giles), YE-334-458 (LaSalle), and YE-250-620 (Blackshear). Panici, Jr. was the prosecutor and motioned to non-suit each matter. Judge Laws granted the motions and dismissed the tickets nunc pro tunc to August 11, 2016.

23. By reason of the conduct described above, Respondent has engaged in the following misconduct:

- a. conduct involving dishonesty, fraud, deceit, or misrepresentation, by conduct including donning a judicial robe and purporting to preside over the remainder of the court call on August 11, 2016 in Courtroom 098 without the authority to do so, purporting to enter judicial orders without authority to do so, and conduct including failing to correct Judge Turner's reference to her as a judge, in

violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010); and

- b. conduct that is prejudicial to the administration of justice, by conduct including presiding over matters on August 11, 2016 when she had no authority to do so and causing the court to have to conduct an investigation and call back the three cases to put them back on the Court's docket, in violation of Rule 8.4(d) of the Illinois Rules of Professional Conduct (2010).

COUNT II

(Criminal conduct of official misconduct and false personation of public officer)

24. The Administrator re-alleges paragraphs one through 22 of Count I, above.

25. At all times alleged in this complaint, there was in full force and effect Section 33-3(a)(2) of the Illinois Compiled Statutes, which states that a public employee commits official misconduct, a Class 3 felony, when, in her official capacity, she knowingly performs an act which she knows she is forbidden by law to perform.

26. At all times alleged in this complaint, there was in full force and effect Section 17-2(b)(2) of the Illinois Compiled Statutes, which states that a person commits a false personation, a Class A misdemeanor, if she knowingly and falsely represents herself to be a public official or public employee.

27. By reason of the conduct described above, Respondent has engaged in the following misconduct:

- a. committing a criminal act that reflects adversely on the lawyer's honesty, trustworthiness or fitness as a lawyer in other respects, by engaging in the crimes of official misconduct and false personation of a public officer, in violation of Section 33-3 and Section 32-5 of the Illinois Compiled Statutes, and in violation of Rule 8.4(b) of the Illinois Rules of Professional Conduct (2010).

COUNT III
(False statements in a disciplinary investigation)

28. The Administrator re-alleges paragraphs one through 22 of Count I, above.

29. On August 12, 2016, the Administrator received a request for investigation of Respondent from Panici, Jr. related to Respondent's conduct on August 11, 2016. Based on the information in Panici, Jr.'s request for investigation, the Administrator initiated investigation number 2016IN03486 into Respondent's conduct.

30. On September 22, 2016, Respondent appeared at her counsel's office to give her sworn statement in relation to investigation number 2016IN03486. At that sworn statement, Respondent made the following statements regarding her conduct on August 11, 2016:

- a. That putting on Judge Turner's robe did not mislead people in Courtroom 098 to think that she was, in fact, a judge; and
- b. That it was clear, based on how things were happening in Courtroom 098 on August 11, 2016, that Judge Turner was trying to teach Respondent.

31. Respondent's statements in paragraph 30, above, were false because Respondent knew that Judge Turner had introduced her as "Judge Crawford" to Panici, Jr. earlier that day and that Judge Turner announced to Courtroom 098 that they would be "switching judges," and that, therefore, the people in Courtroom 098 thought she was a judge.

32. At the time Respondent made the statements referred to in paragraph 30, above, she knew that her statements were false.

33. By reason of the conduct described above, Respondent has engaged in the following misconduct:

- a. conduct involving dishonesty, fraud, deceit, or misrepresentation, by conduct including giving false testimony at her sworn statement on September 22, 2016,

in violation of Rule 8.4(c) of the Illinois Rules of Professional Conduct (2010).

WHEREFORE, the Administrator requests that this matter be referred to a panel of the Hearing Board of the Commission, that a hearing be conducted, and that the Hearing Panel make findings of fact, conclusions of fact and law, and a recommendation for such discipline as is warranted.

Respectfully submitted,

Jerome Larkin, Administrator
Attorney Registration and
Disciplinary Commission

By: 
Shelley M. Bethune

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IN THE SUPREME COURT OF ILLINOIS

In the Matter of:)
)
RHONDA CRAWFORD,) Supreme Court No. M.R.
)
Attorney-Respondent,) Commission No. 2016PR00115
)
No. 6281226.)

PETITION FOR INTERIM SUSPENSION
PURSUANT TO SUPREME COURT RULE 774(a)(2)

Jerome Larkin, Administrator of the Attorney Registration and Disciplinary Commission by his attorneys, Wendy J. Muchman and Shelley M. Bethune, pursuant to Supreme Court Rule 774(a)(2), and this Court's inherent and plenary authority over the practice of law and the administration of the Courts, respectfully requests that this Court issue a rule for Respondent, Rhonda Crawford, to show cause why she should not be suspended until further order of the Court or suspend Respondent on the Court's own motion, and restrain and enjoin Respondent from taking the judicial oath of office or assuming the office of judge, or take such other action as this Court deems just, for having engaged in conduct which threatens irreparable harm to the public, the legal profession and to the orderly administration of justice. In support, the Administrator states:

I. SUMMARY

1. A three-count complaint is pending before the Hearing Board of the Commission against Respondent in *In the Matter of Rhonda Crawford*, 2016PR00115. (Exh. 1, Complaint.) The complaint alleges that on August 11, 2016, in Courtroom 098 of the Markham courthouse ("Courtroom 098"), Respondent engaged in criminal conduct, conduct involving dishonesty, fraud, deceit or misrepresentation, and conduct prejudicial to the administration of justice when she knowingly and falsely donned Judge Valarie Turner's judicial robe during the 1:00 p.m.



court call, took the bench, and purported to preside over the remaining cases on the call, notwithstanding the fact that she was not, and has never been, a judge. (See Exhs. 2, 3 and 4 respectively, affidavits of Luciano Panici, Jr., Officer Derrell White, and Kendrah Blackshear.) Additionally, on two occasions on August 11, 2016, Respondent failed to correct Judge Turner's introduction of her as a judge to persons in Courtroom 098 whom she had never met before. At the time of this misconduct, Respondent was employed by the Office of Chief Judge as a staff attorney assigned to the Honorable Marjorie C. Laws, the Presiding Judge of the Sixth Municipal District. Respondent is currently an unopposed candidate on the ballot for the November 2016 general election for the office of judge in the Circuit Court of Cook County, First Judicial Subcircuit, and has refused to voluntarily remove her name from the ballot.

2. The evidence in this matter shows that Respondent's misconduct and her position as an unopposed candidate for the office of judge in the Circuit Court of Cook County and her refusal to remove her name from the ballot demonstrates that continued practice by Respondent threatens irreparable injury to the public, the legal profession, and the orderly administration of justice. Moreover, persuasive evidence exists to support the allegations in the complaint. The evidence consists of Respondent's admissions and affidavits of the Judge Laws; the Honorable Luciano Panici; Luciano Panici, Jr., the prosecutor for the Village of Dolton; Derrell White, a part-time police officer for the Village of Dolton; and Kendrah Blackshear.

II. PROCEDURAL BACKGROUND

3. On October 7, 2016, the Administrator filed a complaint with the Hearing Board alleging that on August 11, 2016, Respondent engaged in criminal conduct, conduct involving dishonesty, fraud, deceit or misrepresentation, and conduct prejudicial to the administration of justice when she put on a judicial robe and purported to preside over at least three cases in

Courtroom 098 without having the authority to do so and made a misrepresentation to the Administrator in a sworn statement during the investigation of that conduct. (Exh. 1.)

III. PERSUASIVE EVIDENCE SUPPORTS THE CHARGES

4. In August 2011, the Office of Chief Judge Timothy Evans, the Chief Judge of the Circuit Court of Cook County, hired Respondent as a staff attorney and assigned her to work at the Daley Center courthouse. (Exh. 5, Affidavit of Judge Laws.) In May 2015, Respondent was transferred to Markham, at which time Judge Laws became her supervisor. (Exh. 5.) Respondent's job responsibilities included research for the judges in the Sixth Municipal District. (Exh. 6, Respondent's sworn statement, pp. 16:21-17:3, 21:22-22:9.)

5. In March 2016, Respondent won the primary election for the office of judge in the First Judicial Subcircuit of the Circuit Court of Cook County. (Exh. 5.) Respondent is unopposed on the ballot for the November 8, 2016 general election. (Exh. 5.) If elected on November 8, 2016, Respondent would be scheduled to be sworn in as a judge on December 5, 2016.

6. At some time in March 2016, Judge Laws told Respondent that as long as she did not have any outstanding assignments, she could observe how the different judges at Markham handled their calls. (Exh. 5, Exh. 6, pp. 36:15-37:7.)

7. On August 11, 2016, shortly before 9:00 a.m., Respondent went to Courtroom 098 at the Markham courthouse ("Courtroom 098") and sat in the witness box located to the left of the judge's bench. (Exh. 2, Exh. 6, p. 37:19-23; Exh. 7, Affidavit of Jack Kelly and pictures of Courtroom 098.) The judge assigned to Courtroom 098 that day was Judge Valarie Turner, and Respondent went to observe Judge Turner handle the court call. (Exh. 6, p. 34:9-19.)

8. On August 11, 2016, Luciano Panici, Jr. ("Panici, Jr."), the prosecutor for the Village of Dolton, was the prosecutor assigned to Courtroom 098, and he arrived to Courtroom 098 at approximately 9:00 a.m. (Exh. 2.) Respondent was sitting in the witness box when Panici, Jr. arrived. (Exh. 2; Exh. 7.)

9. The court calls in Courtroom 098 on August 11, 2016 were scheduled to begin at 9:00 a.m, 10:30 a.m., and 1:00 p.m. (Exh. 2.) During the 9:00 a.m. and 10:30 a.m. calls, Respondent remained seated in the witness box while Judge Turner handled the cases. (Exh. 2.)

10. At approximately 12:00 p.m., the court recessed for lunch. (Exh. 2.) At that time, Judge Turner introduced Panici, Jr. to Respondent and asked, "Have you met Judge Crawford?" (Exh. 2.) Respondent did not correct Judge Turner's statement that she was a judge, and Panici, Jr., who had not previously met Respondent, therefore believed that Respondent was a new judge at Markham. (Exh. 2.)

11. Shortly before 1:00 p.m., Panici, Jr. returned to Courtroom 098 for the afternoon call. Officer Derrell White ("White"), a part-time Village of Dolton police officer, also arrived to Courtroom 098 at approximately 1:00 p.m. (Exh. 3, Affidavit of Officer Derrell White.) White sat in the chairs located to the left of and slightly behind the witness box, where Respondent was again seated. (Exh. 3; Exh. 7.)

12. Judge Turner began the 1:00 p.m. call and initially handled the cases. (Exhs. 2 & 3.) Near the end of the call, Judge Turner announced, "We're going to switch judges." (Exh. 4, Affidavit of Kendrah Blackshear.) At that time, Judge Turner stood up and gave her judicial robe to Respondent, who put on the robe and sat down on the judge's chair behind the bench. (Exhs. 2, 3 & 4, Exh. 6, pp. 31:6-32:19.) Respondent did not decline to accept Judge Turner's robe or otherwise indicate that she was not a judge. (Exhs. 2, 3 & 4; Exh. 6, pp. 38:21-39:10.)

As a result of his introduction to Respondent earlier that day, Panici, Jr. believed Respondent was a new judge at Markham and did not question her authority to hear the remaining cases on the call. (Exh. 2.)

13. While wearing Judge Turner's robe and sitting in the judge's chair behind the bench, Respondent purported to hear the remaining matters on the 1:00 p.m. call as Judge Turner stood behind her. (Exhs. 2, 3 & 4; Exh. 6, pp. 31:6-34:7.) While Respondent was wearing Judge Turner's robe and sitting on the bench, the court clerk called the case of defendant Maliq Giles ("Giles"), ticket YE-334-458. (Exh. 2.) Respondent asked Giles if he had his insurance card, but he did not have it. (Exh. 6, p. 33:6-8.) On the motion of Giles, Respondent purported to continue the matter to October 26, 2016 and reflected her purported continuance by writing "MD 10-26-16" on the back of ticket YE-334-458. (Exh. 6, pp. 44:24-45:14; Exh. 8, Ticket YE-334-458, Maliq Giles.)

14. As the call continued, the clerk called the case of defendant Angel LaSalle ("LaSalle"), ticket YB-701-075. (Exh. 2.) When LaSalle stepped up to the bench, Respondent said to LaSalle, "Officer is not in court." (Exh. 6, p. 33:15-19.) Panici, Jr. made a motion to continue the matter, and Respondent turned to Judge Turner and asked, "Can I deny his motion?" (Exh. 2.) Judge Turner replied, "Yes, you can deny the motion." (Exh. 2.) Respondent then purported to deny Panici, Jr.'s motion and Panici, Jr. made a motion to non-suit the matter. (Exh. 2.) Respondent purported to grant Panici, Jr.'s motion to non-suit the matter and told LaSalle his ticket had been dismissed. (Exh. 6, p. 49:8-11.) Respondent reflected her purported dismissal by writing "ONIC" (Officer Not In Court) and "MCNS" (Motion City Non-Suit) on the back of ticket YB-701-075. (Exh. 6, p. 47:18-22; Exh. 9, Ticket YB-701-705, Angel LaSalle.)

15. At some point while Respondent was wearing Judge Turner's robe and sitting on the bench, the case of defendant Kendrah Blackshear, ticket YE-250-620, was called. (Exh. 4.) The Village of Dolton had issued Blackshear a traffic ticket on June 17, 2016 for her alleged failure to have a valid driver's license. (Exh. 4.) Blackshear stepped up to the bench before Respondent, believing that she was a judge. (Exh. 4.) Blackshear presented a valid driver's license to Panici, Jr., who then made a motion to non-suit the matter. (Exh. 4.) Respondent purported to grant the motion. (Exh. 4; Exh. 10, Ticket YE-250-620, Kendrah Blackshear.)

16. At the conclusion of the 1:00 p.m. call, after White had observed Respondent seated at the judge's bench, wearing a judicial robe and ruling on tickets, White approached Respondent to congratulate her, thinking that she was a judge. (Exh. 3, Affidavit of Officer Derrell White.) White asked Respondent if she would be assigned to Markham and Respondent replied that she was in Markham now, but would probably be assigned downtown. (Exh. 3.)

17. On August 11, 2016, at approximately 1:30 p.m., Panici Jr. left Courtroom 098 and went to the chambers of his father, the Honorable Luciano Panici. (Exh. 2; Exh. 11, Affidavit of Judge Luciano Panici.) Panici, Jr. told his father that he had just stepped up in front of a new judge and that he was surprised she did not know how to rule on a routine motion to continue. (Exhs. 2 & 11.) Judge Panici asked what new judge Panici, Jr. was referring to because there were no new judges at Markham. (Exhs. 2 & 11.) When Panici, Jr. indicated that he meant Respondent, Judge Panici informed Panici, Jr. that Respondent was not a judge. (Exhs. 2 & 11.) Judge Panici instructed Panici, Jr. to immediately report the incident to the presiding judge at Markham, Judge Laws. (Exhs. 2 & 11.)

18. Panici, Jr. then went to Judge Laws' office and requested to speak with her. (Exh. 2.) Panici, Jr. informed Judge Laws of what had just occurred in Courtroom 098. (Exhs. 2 & 5.)

Judge Laws became very upset and left her office to find Respondent and Judge Turner. (Exhs. 2 & 5.)

19. Judge Laws found Judge Turner in Judge Camille Willis' office, and she asked, "Val, is it true you let Rhonda Crawford wear your robe and hear cases?" (Exh. 5.) Judge Turner replied, "I thought she was a judge." (Exh. 5.) Judge Laws told Judge Turner to stay in Judge Willis' office until she returned. (Exh. 5.)

20. Judge Laws went to Courtroom 098 with Kara Srsha, the Court Coordinator at Markham, and, as they arrived, Respondent was coming out of the courtroom. (Exh. 5.) Judge Laws told Respondent, "You've been reported" as they walked back into Courtroom 098. (Exh. 5; Exh. 6, p. 51:3-9.) At that time, Respondent knew immediately that Judge Laws was referring to the fact that she took the bench wearing Judge Turner's robe. (Exh. 6, p. 53:13-18.) Judge Laws asked Respondent what tickets she had purported to rule on, and Respondent pointed to two tickets on the court clerk's desk. (Exh. 5.) Judge Laws asked Respondent if she had written on the back of the tickets and Respondent indicated that she had. (Exh. 5.) Judge Laws then told Respondent to meet her upstairs, and Judge Laws left to find Judge Turner. (Exh. 5.)

21. Judge Laws went back to Judge Willis' office and told Judge Turner that her conduct would have to be reported to the Judicial Inquiry Board. (Exh. 5.)

22. Judge Laws left Judge Willis' office and saw Respondent in the hallway. At that time, Respondent said, "I did it. I did it." (Exh. 5; Exh. 6, p. 53:1-9.) Judge Laws asked Respondent, "Why would you want to risk your career for something like this?" and Respondent replied, "It's the robe isn't it? He's just mad because I denied his motion for continuance." (Exh. 5; Exh. 6, p. 52:1-5.) Judge Laws told Respondent she would have to report the incident and Respondent replied, "Wow." (Exh. 5.)

23. Judge Laws then immediately reported Respondent's conduct and Judge Turner's conduct to Chief Judge Evans. (Exh. 5.)

24. On August 12, 2016, Judge Laws informed the Clerk's Office and the Sheriff's Office of the incident. On August 15, 2016, Judge Laws sent a report of Judge Turner's conduct to the Judicial Inquiry Board and a report of Respondent's conduct to Human Resources for the Office of the Chief Judge. (Exh. 5.) The Office of the Chief Judge and Panici Jr. both reported Respondent's conduct to the Attorney Registration and Disciplinary Commission. (Exh. 5.)

25. On August 26, 2016, Respondent was terminated from her position as staff attorney with the Office of the Chief Judge. (Exh. 6, pp. 59:24-60:5.)

26. As a result of Judge Laws' investigation into what occurred on August 11, 2016, Judge Laws placed the below three traffic tickets back on the court's docket. On September 1, 2016, Judge Laws heard the matters and dismissed them *nunc pro tunc* to August 11, 2016:

- a) YE-250-620 (Kendrah Blackshear)
- b) YB-701-075 (Maliq Giles)
- c) YE-334-458 (Angel LaSalle)

(Exh. 12, Transcripts of Judge Laws.) On the same date, the Office of the Clerk of the Circuit Court of Cook County sent letters to Kendrah Blackshear, Maliq Giles, and Angel LaSalle informing them that their tickets had been dismissed. (Exh. 13, Letters to Defendants.)

27. On September 23, 2016, Counsel for the Administrator issued a subpoena for Judge Turner's appearance and sworn testimony at the Commission's Chicago office on September 29, 2016 in connection with the investigation initiated based on the reports of Panici, Jr. and the Office of the Chief Judge. (Exh. 14, Subpoena to Judge Valarie Turner.) Counsel for the Administrator thereafter agreed to reschedule Judge Turner's appearance at the request of her counsel.

28. At her sworn statement, Respondent maintained that everyone in the courtroom knew she was not a judge, despite the evidence to the contrary, including her interactions with Judge Turner (who introduced Respondent as a judge) and Officer White, (who congratulated Respondent and asked about her future assignment). (Exh. 6, pp. 39:15-40:22, pp. 56:15-57:5.) Rather than showing genuine remorse, Respondent fluctuated between acknowledging that she made mistakes on August 11, 2016 and insisting that she did nothing wrong, in part asserting that her conduct was excused because Judge Turner was standing behind her. (Exh. 6, p. 60:10-61:22, pp. 89:11-91:23.) In addition, on September 22, 2016, the morning of her sworn statement, Respondent gave a press conference, at which time she implied that she had done nothing wrong because “the judge stood over [her] the entire time” and she was “always under the direction of a judge.” (Exh. 15, Transcript of Press Conference and Website of Press Conference Video; see at <http://www/chicagotribune.com/news/local/breaking/ct-judge-clerk-speaks-out-20160922-story.html>.) However, as Respondent acknowledged, there is nothing in the Court’s rules that allows would-be judges to carry out the functions of a judicial officer under the supervision of an acting judge as its Rule 711 allows law students to perform certain legal services under the supervision of a licensed attorney. (Exh. 6, pp. 70:13-74:16.) At the press conference, Respondent stressed that she intends to win the election and become a judge. (Exh. 15, p. 4.)

29. As of the date of filing of this petition, Respondent is an unopposed candidate on the ballot for the November 2016 general election for the office of judge. (Exh. 5.) Although Counsel for the Administrator inquired of Respondent and her counsel at the outset of the Administrator’s investigation whether Respondent would voluntarily remove her name from the ballot, Respondent has declined to do so, and has indicated that she intends to become a judge.

(Exh. 6, p. 61:10-15; Exh. 15.) If Respondent is elected on November 8, 2016, she is expected to be sworn in as a judge on December 5, 2016.

IV. ARGUMENT

30. Rule 774(a)(2) allows the Administrator to petition the Court to issue a rule to show cause, and provides that the Court may suspend an attorney, where a complaint has been voted by the Inquiry Board; the attorney-respondent has committed a violation of the Rules of Professional Conduct involving fraud or moral turpitude or threatening irreparable injury to the public, his or her clients, or to the orderly administration of justice; and there appears to be persuasive evidence to support the charges. In addition to a suspension pursuant to the Administrator's petition for a rule to show cause, Rule 774(a) provides that during the pendency of a disciplinary proceeding the court may suspend an attorney on its own motion.

31. Respondent's misconduct meets the requirements for an interim suspension under Rule 774(a)(2). The Inquiry Board has voted that a complaint be filed against Respondent, and that complaint is pending before the Hearing Board. (Exhibit 1). Respondent's own admissions and the supporting affidavits of Panici, Jr., Judge Panici, Judge Laws, Kendrah Blackshear, and Derrell White provide persuasive evidence to support the charges that Respondent engaged in criminal conduct, conduct involving dishonesty, fraud, deceit or misrepresentation, and conduct prejudicial to the administration of justice. The available evidence demonstrates that Respondent engaged in dishonest and fraudulent conduct when, on August 11, 2016, she knowingly purported to preside over cases in a courtroom at the Markham courthouse without the authority to do so, and when she failed to correct Judge Turner's introduction of her as judge to the people in Courtroom 098. Moreover, Respondent's refusal to remove her name from the ballot for the November 8, 2016 general election for the office of judge, and her insistence that everyone in the courtroom knew she was not a judge in spite of every indication to the contrary, poses a threat of

irreparable injury to the public, the legal profession, and the orderly administration of justice, due to Respondent's failure to understand the importance of the judicial oath and the gravity of her conduct.

32. Respondent's lack of judgment in impersonating a judge, her subsequent dishonesty in failing to correct those who misunderstood her role, her lack of genuine remorse about the prejudice her actions have caused to the legal system, (for example when Judge Laws had to recall the tickets at issue,) and her failure to voluntarily remove her name from the judicial ballot, reflect her fundamental lack of eligibility to maintain a license to practice law. When the Character and Fitness Committee, appointed by this Court, determines that an applicant is eligible to practice law in this State pursuant to Supreme Court Rule 708, the Committee considers a number of factors, including the following: ... (3) the ability to exercise good judgment in conducting one's professional business; (4) the ability to conduct oneself with the highest degree of honesty, integrity, and trustworthiness in all professional relationships and with respect to all legal obligations; (5) the ability to conduct oneself with respect for and in accordance with the law and Illinois Rules of Professional Conduct; ...and (10) the ability to conduct oneself properly and in a manner that engenders respect for the law and the profession. (Sup. Ct. Rule 708(c).) Respondent's conduct is not limited to what occurred on August 11, 2016 in Courtroom 098. It includes her subsequent insistence that the fact that Judge Turner was standing behind her mitigates her conduct, her dishonesty in failing to correct the misimpression of those who thought she was a judge, her refusal to remove her name from the ballot, and her ill-advised decision to hold a press conference that only brought further embarrassment to the legal profession. (Exhs. 2, 3, 4, 6, p. 61:10-15, & 15.) These actions demonstrate Respondent's fundamental lack of eligibility to maintain a license to practice law, insofar as they reflect

Respondent's lack of good judgment, lack of honesty and integrity, lack of respect for the law and the Illinois Rules of Professional Conduct, and lack of ability to conduct herself in a manner that engenders respect for the law and profession. (Sup. Ct. Rule 708(c).)

33. It is not unprecedented in this State for this Court to enjoin an attorney from taking the oath of office as a judge. In *In re Joseph Edward McDermott*, M.R. 4121, 86 CH 255 (November 26, 1986), this Court restrained and enjoined Joseph McDermott from taking the oath of office as a judge or from otherwise entering upon the duties of a judge in the Circuit Court of Cook County until good cause was shown. *In re Joseph Edward McDermott*, M.R. 4121, 86 CH 255 (November 26, 1986). McDermott was under investigation by the United States Attorney, was the subject of an investigation by the Commission, and had been found to be in contempt of court in grand jury proceedings in the Northern District of Illinois for refusing to testify. During the course of the criminal proceedings in *United States v. LeFevour*, 84 CR 837, an individual, James LeFevour, testified that on numerous occasions McDermott paid money on his own behalf and that of other attorneys in order to obtain favorable rulings on cases. On November 4, 1986, McDermott was elected to the office of judge of the Circuit Court of Cook County, and he was scheduled to assume the duties of circuit judge on December 1, 1986. In order to prevent irreparable injury to the public and to the administration of justice as a consequence of McDermott assuming the office of judge, this Court ordered, on November 19, 1986, that McDermott show cause why he should not be suspended from the practice of law until further order of the court and restrained from taking the oath or assuming office as a circuit court judge. On November 26, 1986, this Court entered an order restraining and enjoining McDermott from taking the oath of office as a judge until further order of the Court and until good cause was demonstrated for the vacation of the Order and continuing the rule to show cause until further

order of court. On December 17, 1986, the Court allowed the motion by Joseph Edward McDermott pursuant to Supreme Court Rule 762 to strike his name from the roll of attorneys licensed to practice law in Illinois.

34. As this Court did in *McDermott*, the facts of the present case warrant an interim suspension against Respondent in order to prevent irreparable injury to the legal profession, the public and to the administration of justice as a result of Respondent assuming the office of judge. Further, the facts warrant this Court to enjoin and restrain Respondent from taking the oath or assuming the office of judge on December 5, 2016 in the event of her eventual election.

35. Section 11 of Article VI of the 1970 Constitution of the State of Illinois provides, in relevant part, as follows:

No person shall be eligible to be a Judge or Associate Judge unless he is a United States citizen, a licensed attorney-at-law of this State, and a resident of the unit which selects him.

If Respondent is suspended from the practice of law, she will not be eligible to be a judge in Illinois, since she will not be able to practice law and, therefore, will not meet the eligibility requirements of the Constitution of the State of Illinois. In construing provisions of a constitution, it is a general rule that the words shall be given the meaning which they bear in ordinary use. *People ex rel. Watseka Tel. Co. v. Emmerson*, 302 Ill. 300 (1922). The constitution should be read and understood according to the most natural and obvious meaning of the language, in order to avoid eliminating or extending its operation, and where words of the constitution are clear, explicit, and unambiguous, there is no need for a court to engage in construction. *Maddux v. Blagojevich*, 233 Ill. 2d 508, 523 (2009). Additionally, this Court's decision in the case of *Applebaum v. Rush Univ. Med. Ctr.*, 231 Ill. 2d 429 (2008), while factually unrelated to the issues before the Court in this case, has some language that is

instructive on the meaning of the word “licensed” in the context of Illinois attorneys. In that case, which involved whether or not a lawyer’s registration status rendered his filing of a complaint for a client a nullity, the Court stated that a valid license to practice law requires the attorney not be disciplined for conduct relating to the person’s “skill, fitness or competency to practice law.” 231 Ill. 2d at 441. This petition alleges facts demonstrating that Respondent does not have the fitness, in as much as she lacks the ability to conduct herself in a manner that engenders respect for the law and the profession, the judgment, and the honesty, to maintain a valid license.

36. Other courts have resolved similar situations and determined that a lawyer suspended from the practice of law is not entitled to be a judge. In February 1973, the Supreme Court of New Hampshire ordered that Mack Mussman could not continue to sit as a justice of the Littleton District Court where he was suspended from the practice of law in New Hampshire. *In re Mussman*, 113 N.H. 54 (1973). The court noted that if Mussman was not entitled to confidence in his integrity as a lawyer, public confidence in him as a judge was unwarranted. *Id.* at 57. The court concluded that in the interest of preserving the integrity and impartiality of the judiciary, justice required that Mussman should not continue to sit as a justice of the Littleton court. *Id.*

37. Similarly, in August 2016, the United States District Court for the Northern District of Indiana determined that a disbarred lawyer could not serve in the position of judge. *Lehman v. Individual Members of the Ind. Electoral Comm’n*, No. 3:16-CV-458-JVB-CAN, 2016 U.S. Dist. LEXIS 104470 (N.D. Ind. August 8, 2016). On February 19, 2014, the Supreme Court of Indiana suspended Joseph Lehman from the practice of law, effective April 3, 2014. *Lehman*, at 1. On July 13, 2016, Lehman asked the District Court to order the Indiana Electoral

Commission to place his name on the upcoming general election ballot for the office of judge. *Id.* On July 21, 2016, the Supreme Court of Indiana disbarred Lehman. *Id.* The District Court reasoned that because Lehman had been disbarred, he was ineligible to serve in the position of judge under the Indiana Constitution, which provides that a judge “shall have been duly admitted to practice law by the Supreme Court of Indiana.” *Id.* at 2.

38. In 2009, the Florida Supreme Court determined that a circuit court judge-elect who was suspended from the practice of law could not be commissioned to assume the role of a judge since, as a result of his suspension, he did not satisfy the constitutional eligibility requirement of that office that he be “a member of the bar.” *In re Advisory Opinion to Governor Re Elected Judge*, 17 So.3d 265 (2009)¹. The Florida Supreme Court noted that based on cases from other state supreme courts, it is the “common sense understanding” that where bar membership is an eligibility requirement for judicial office, one may not be a judge in a court in which one’s own practice as a lawyer would be disallowed. See *State ex. Rel. Willis v. Monfort*, 93 Wash. 4, 159 P. 889, 891 (1916) *267 (“No person is eligible to the office of judge of the superior court unless...he is, at the time he becomes a candidate or is required to qualify as such judge, entitled practice in the courts of this state.”); see also *Johnson v. State Bar of Cal.*, 10 Cal. 2d 212, 72 P.2d 1191, 1193 (1937) (“[c]ertainly an attorney who has been suspended from the practice of law during this period cannot successfully claim to be eligible.”); *Cornett v. Judicial Ret. & Removal Comm’n*, 625 S.W. 2d 564 (KY. 1981) (stating that a person under temporary suspension from the practice of law cannot serve as a judge).

39. Pursuant to Supreme Court Rule 774(a), in order to protect the public and uphold the integrity of the profession, the Administrator requests that this Court issue a rule for

¹ Although advisory opinions are not binding judicial precedent in Florida, they are frequently very persuasive and usually adhered to by courts in that state. *Barley v. S. Fla. Water Mgmt. Dist.*, 823 So. 2d 73, 82 (Fla. 2002).

Respondent to show cause why she should not be suspended until further order of the Court and, if this Court determines that the rule to show cause should be enforced, that the Court also restrain and enjoin Respondent from taking the judicial oath of office or assuming the office of judge on December 5, 2016.

V. CONCLUSION

40. Based on the information set forth above, and the pending disciplinary case against Respondent, *In the Matter of Rhonda Crawford*, 2016PR00115, the Administrator has established grounds for this Court to suspend Rhonda Crawford until further order of the court and restrain and enjoin her from taking the judicial oath of office or assuming the office of judge. A suspension until further order of the Court pursuant to Supreme Court Rule 774(a) is required for the purposes of protecting the public, the integrity of the profession and the administration of justice.

WHEREFORE, the Administrator respectfully requests that this Court pursuant to Supreme Court Rule 774(a)(2), and this Court's inherent and plenary authority over the practice of law and the administration of the Courts, issue a rule for Respondent, Rhonda Crawford, to show cause why she should not be suspended until further order of the Court or suspend Respondent on the Court's own motion, and restrain and enjoin Respondent from taking the judicial oath of office or assuming the office of judge, or take such other action as this Court deems just.

Respectfully submitted,

Jerome Larkin, Administrator
Attorney Registration and
Disciplinary Commission

By: /s/ Wendy J. Muchman
 /s/ Wendy J. Muchman

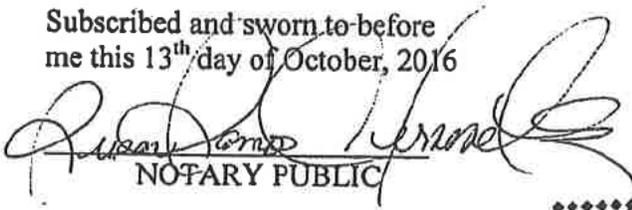
By: /s/ Shelley Bethune
 Shelley Bethune

VERIFICATION

I, Wendy J. Muchman, an attorney, being first duly sworn, state that the allegations contained in the Administrator's Petition for Interim Suspension Pursuant to Supreme Court Rule 774 are true and correct to the best of my knowledge and belief.


Wendy J. Muchman

Subscribed and sworn to before
me this 13th day of October, 2016


NOTARY PUBLIC



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MEDIA ALERT
October 20, 2016

For More Information Contact:
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Indictment Of Rhonda Crawford – The Democratic Party’s Triangle Offense To Steal An Election

A Statement From The Committee To Elect Rhonda Crawford For Judge

Attorney Rhonda Crawford was indicted by the Cook County Grand Jury on October, 19, 2016, which is just the latest move in the Triangle Offense by the Democratic Party of Cook County to disenfranchise thousands of voters on the South Side of Chicago and in the South Suburbs.

The first move in the Triangle Offense occurred between titans in the Democratic Party in connection with the election for Chief Judge of the Circuit Court. As reported by various news outlets, Rhonda Crawford became a pawn in the battle of former Alderman Tom Allen to unseat Chief Judge Tim Evans. The biggest player in the robe incident involving Crawford is Judge Valerie Turner who *gave* her robe to Crawford. Crawford publicly admitted her role in the incident and apologized. Turner has not been seen or heard from since. The play by the party is to keep Turner silent and allow her to quietly retire, presumably using her 5th Amendment rights if she were ever called to explain what happened in her courtroom, thereby leaving Crawford as roadkill, while everyone else associated with the incident runs for cover.

The second move in the Triangle Offense involves the Democratic Party’s unprecedented campaign for a write-in candidate against Crawford, even though she legitimately won the Democratic primary in March over her challenger. The Party is backing the write-in candidate by: asking Alderman to encourage their constituents to vote for the write-in candidate; funding a prominent election attorney to work against Crawford; and, funding the candidacy of the write-in candidate so that the party can keep control of the person who wins the judgeship.



The third and latest move in the Triangle Offense involves the indictment filed by Cook County State's Attorney Anita Alvarez. The incident involving Ms. Crawford at the Markham Courthouse took place on August 11, 2016, which means that any statute of limitations would run on August 11, 2017, at the earliest. Thus, there was no legal need to file the indictment on October 19, 2016.

The timing of the indictment two weeks before the election is simply an attempt to disenfranchise voters on the South Side and in the South Suburbs. Whether it was her failed effort to delay the release of the Laquan McDonald video, or this current attempt to prevent Ms. Crawford from winning her election, principles of justice and the residents of Cook County deserve better.

Besides the fact that Alvarez has chosen to indict Crawford (and apparently overlook Judge Turner), this indictment also serves as a parting gift to the incoming State's Attorney, because the case will certainly not go to trial before Alvarez is long gone. Crawford is surely the smallest player in this latest installment of Democratic Machine politics in Cook County. The voters on the South Side of Chicago and the South Suburbs will not be disenfranchised. Rhonda Crawford will continue to fight the good fight and win the election.

###

No. _____

**IN THE
SUPREME COURT OF ILLINOIS**

MARYAM AHMAD,)
)
 Petitioner,)
)
 v.)
)
 ILLINOIS STATE BOARD OF)
 ELECTIONS, and CHICAGO BOARD OF)
 ELECTION COMMISSIONERS, and its)
 Members, MARISEL A. HERNANDEZ,)
 Chairwoman, WILLIAM J. KRESSE, &)
 JONATHAN T. SWAIN, and DAVID ORR,)
 in his official capacity as COOK COUNTY)
 CLERK, and RHONDA CRAWFORD,)
)
 Respondents.)

NOTICE OF FILING AND SERVICE

TO: See attached Service List

PLEASE TAKE NOTICE that on **October 21, 2016**, the undersigned caused to be filed with the Clerk of the Illinois Supreme Court, **PETITIONER'S EMERGENCY MOTION FOR SUPERVISORY ORDER OR FOR WRIT OF PROHIBITION OR MANDAMUS**, a copy of which is hereby served upon you.

By:  _____
One of Petitioner's Attorneys

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CERTIFICATE OF SERVICE

I, Burton S. Odelson, an attorney, certify that on October 21, 2016, I caused a true and correct copy of **PETITIONER'S EMERGENCY MOTION FOR SUPERVISORY ORDER OR FOR WRIT OF PROHIBITION OR MANDAMUS** to be served upon counsel of record as indicated in the below Service List.



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Rhonda Crawford
363 Hoxie Avenue
Calumet City, IL 60409
Via U.S. Mail

**IN THE
SUPREME COURT OF ILLINOIS**

MARYAM AHMAD,)
)
 Petitioner,)
)
 v.)
)
 ILLINOIS STATE BOARD OF)
 ELECTIONS, and CHICAGO BOARD OF)
 ELECTION COMMISSIONERS, and its)
 Members, MARISEL A. HERNANDEZ,)
 Chairwoman, WILLIAM J. KRESSE, &)
 JONATHAN T. SWAIN, and DAVID ORR,)
 in his official capacity as COOK COUNTY)
 CLERK, and RHONDA CRAWFORD,)
)
 Respondents.)

[PROPOSED] ORDER

This matter coming before the Court on Plaintiff's Emergency Motion for Supervisory Order or for Writ of Prohibition or *Mandamus*, due notice having been given, and the Court having been duly advised, IT IS HEREBY ORDERED THAT:

1. Plaintiff's Emergency Motion for Supervisory Order is GRANTED/DENIED; if granted, this Court will Order the Election Authorities to removed Rhonda Crawford, as a legally qualified candidate, from the November 8, 2016 election ballot, and any votes cast for Rhonda Crawford will be suppressed and not counted.

2. Leave to File a Complaint for Writ of Prohibition is GRANTED/DENIED.

3. Leave to File a Complaint for Writ of *Mandamus* is GRANTED/DENIED.

ENTERED: _____
JUSTICE

DATED: _____

Prepared by:

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