

121472

No. 121472

10/28/2016

Supreme Court Clerk

IN THE  
SUPREME COURT OF ILLINOIS

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MARYAM AHMAD,	)	On Emergency Motion
	)	for Supervisory Order or
Petitioner,	)	for Leave to File Writ of
	)	Prohibition or <i>Mandamus</i>
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.	)	

**PETITIONER’S RESPONSE TO RHONDA CRAWFORD’S MOTION  
FOR EXTENSION OF TIME IN WHICH TO RESPOND TO EMERGENCY  
MOTION FOR SUPERVISORY ORDER OR FOR LEAVE TO FILE WRIT OF  
PROHIBITION OR MANDAMUS**

NOW COMES Petitioner, MARYAM AHMAD, by and through her attorneys, Odelson & Sterk, Ltd., and in Response to Rhonda Crawford’s Motion for Extension of Time in which to Respond to Petitioner’s Emergency Motion for Supervisory Order or for Leave to File Writ of Prohibition or *Mandamus*, states as follows:

1. Petitioner’s request to remove candidate Rhonda Crawford (“Crawford”), or to suppress any votes cast for her, was timely made after the request for Interim Suspension was made by the Attorney Registration and Disciplinary Commission (“ARDC”).
2. As specifically stated in the Emergency Motion for Supervisory Order or for Leave

to File Writ of Prohibition or *Mandamus*, “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 be cast at the November 8, 2016 election.” (*See*, Emergency Motion, p. 6).

3. The request for an extension of time in this matter, as well as the request for an extension of time to respond to the ARDC’s request to suspend, is done solely for the purpose of getting Crawford past the general election where she will, with near certainty, be elected.

4. The Emergency Motion was conditioned on action by the Court in response to the ARDC’s request to suspend Ms. Crawford. Thus, if this Court does not grant the relief requested by the ARDC, Crawford remains a candidate, on the ballot, and will be elected.

5. Further, if Crawford is suspended after the election, and is not able to serve as a judge, the lawful and fully qualified write-in candidate, Maryam Ahmad, will not be declared the winner since the vacancy will not occur until after the election. This will deprive her supporters and the electorate desiring to vote for a legally qualified candidate, the opportunity for representation by their choosing – rather than the Court filling the vacancy.

6. Due to the late filings by the ARDC, removal from the ballot does not remain as a viable option, but the suppression of any votes is certainly within the discretionary and administrative power of this Court.

7. Petitioner agrees with Crawford’s representation that suppression of votes is an “extreme” remedy. (*See*, Crawford’s Motion, p.2, ¶5). Her admission, however, that she donned a judicial robe, sat in the judge’s chair, and made “notations” on tickets in three cases (*See*, Respondent Rhonda Crawford’s Motion for Extension of Time to Respond to Administrator’s

Petition for Interim Suspension Pursuant to Supreme Court Rule 774(a)(2) or for Denial of Interim Suspension with the Clerk of the Attorney Registration and Disciplinary Commission in Chicago, Illinois, *In the matter of Rhonda Crawford*, S. Ct. No. M.R. 28341, p. 3, ¶12), is more “extreme” and most certainly calls into play the, “...concerns of adverse impact upon the public’s perception of the dignity and integrity of the judiciary...”. (See, Crawford’s Motion for Extension of Time, *In the matter of Rhonda Crawford*, S. Ct. No. M.R. 28341, p. 3, ¶10).

8. If Ms. Crawford “recognizes that the integrity of the judicial system must be maintained,” (See, Crawford’s Motion, p. 3, ¶6), she would not have acted as a judge and presided over three cases in the Markham courtroom.

9. The dignity of the judiciary is called into question by Crawford’s admitted acts. If this Court acts favorably on the ARDC’s request for an interim suspension, then Crawford is not qualified to be a candidate for judge. The voters of the 1<sup>st</sup> Judicial Subcircuit deserve a choice and the ability to vote for a legally qualified candidate.

WHEREFORE, Petitioner, MARYAM AHMAD, respectfully requests this Court enter an order denying Rhonda Crawford’s Motion for Extension of Time in which to Respond to Petitioner’s Emergency Motion for Supervisory Order or for Leave to File Writ of Prohibition or *Mandamus*, and for whatever other relief this Court deems just and fair.

Respectfully submitted,

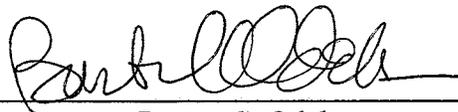
MARYAM AHMAD, Petitioner

By: /s/Burton S. Odelson  
Burton S. Odelson, one of her Attorneys

Burton S. Odelson, #2090457 ([attyburt@aol.com](mailto:attyburt@aol.com))  
Mary Ryan Norwell, #6186978 ([mnorwell@odelsonsterk.com](mailto:mnorwell@odelsonsterk.com))  
**ODELSON & STERK, LTD.**  
3318 W. 95<sup>th</sup> Street  
Evergreen Park, IL 60805  
(708) 424-5678 – office/(708) 424-5755 – fax

**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 PETITIONER'S RESPONSE TO RHONDA CRAWFORD'S MOTION FOR EXTENSION OF TIME IN WHICH TO RESPOND TO EMERGENCY MOTION FOR SUPERVISORY ORDER OR FOR LEAVE TO FILE 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.



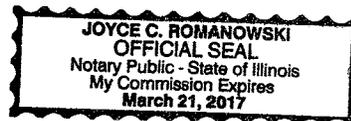

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 Burton S. Odelson

Subscribed and Sworn to before me  
this 28<sup>th</sup> day of October, 2016.




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 NOTARY PUBLIC


Burton S. Odelson, #2090457  
 Mary Ryan Norwell, #6186978  
**ODELSON & STERK, LTD.**  
 3318 W. 95<sup>th</sup> Street  
 Evergreen Park, IL 60805  
 (708) 424-5678 – office  
 (708) 424-5755 – fax  
[attyburt@aol.com](mailto:attyburt@aol.com)  
[mnorwell@odelsonsterk.com](mailto:mnorwell@odelsonsterk.com)

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CLERK, and RHONDA CRAWFORD,	)	
	)	
Respondents.	)	

**NOTICE OF FILING AND SERVICE**

TO: See attached Service List

PLEASE TAKE NOTICE that on **October 28, 2016**, the undersigned electronically filed with the Clerk of the Illinois Supreme Court, **PETITIONER’S RESPONSE TO RHONDA CRAWFORD’S MOTION FOR EXTENSION OF TIME IN WHICH TO RESPOND TO EMERGENCY MOTION FOR SUPERVISORY ORDER OR FOR LEAVE TO FILE WRIT OF PROHIBITION OR MANDAMUS**, a copy of which is hereby served upon you.

By: /s/Burton S. Odelson  
One of Petitioner’s Attorneys

Burton S. Odelson, #2090457  
Mary Ryan Norwell, #6186978  
**O DELSON & S TERK, LTD.**  
3318 W. 95<sup>th</sup> Street  
Evergreen Park, IL 60805  
(708) 424-5678 – office  
(708) 424-5755 – fax  
[attyburt@aol.com](mailto:attyburt@aol.com)  
[mnorwell@odelsonsterk.com](mailto:mnorwell@odelsonsterk.com)

\*\*\*\*\* Electronically Filed \*\*\*\*\*

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Supreme Court Clerk

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**CERTIFICATE OF SERVICE**

I, Burton S. Odelson, an attorney, certify that on October 28, 2016, I caused a true and correct copy of **PETITIONER'S RESPONSE TO RHONDA CRAWFORD'S MOTION FOR EXTENSION OF TIME IN WHICH TO RESPOND TO EMERGENCY MOTION FOR SUPERVISORY ORDER OR FOR LEAVE TO FILE WRIT OF PROHIBITION OR MANDAMUS** to be served upon the parties, *via e-mail*, at the e-mail addresses indicated in the below Service List.

/s/Burton S. Odelson

Burton S. Odelson

Burton S. Odelson, #2090457  
 Mary Ryan Norwell, #6186978  
**ODELSON & STERK, LTD.**  
 3318 W. 95<sup>th</sup> Street  
 Evergreen Park, IL 60805  
 (708) 424-5678 – office  
 (708) 424-5755 – fax  
[attyburt@aol.com](mailto:attyburt@aol.com)  
[mnorwell@odelsonsterk.com](mailto:mnorwell@odelsonsterk.com)

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**SERVICE LIST**

Mary Robinson  
*Attorney for Rhonda Crawford*  
 Robinson Law Group, LLC.  
 20 S. Clark St., Suite 1060  
 Chicago, IL 60603  
*Via E-Mail:* [mrobinson@robinlawillinois.com](mailto:mrobinson@robinlawillinois.com)

Adrian Vuckovich  
*Attorney for Rhonda Crawford*  
 Collins Bargione & Vuckovich  
 1 North LaSalle Street, Suite 300  
 Chicago, IL 60602  
*Via E-Mail:* [av@cb-law.com](mailto:av@cb-law.com)

Andrew Finko  
*Attorney for Rhonda Crawford*  
 180 W. Washington Street, Suite 400  
 Chicago, IL 60602  
*Via E-Mail:* [finkolaw@fastmail.fm](mailto:finkolaw@fastmail.fm)

Nadine J. Wichern, Assistant Attorney General  
*Attorney for Illinois State Board of Elections*  
 100 W. Randolph Street, 12<sup>th</sup> Floor  
 Chicago, IL 60601  
*Via E-Mail:* [CivilAppeals@atg.state.il.us](mailto:CivilAppeals@atg.state.il.us)  
[nwichern@atg.state.il.us](mailto:nwichern@atg.state.il.us)

Marie D. Spicuzza, Assistant State's Attorney  
*Attorney for David Orr, in his official capacity as Cook County Clerk*  
 Cook County State's Attorney's Office  
 500 Daley Center  
 Chicago, IL 60602  
*Via E-Mail:* [marie.spicuzza@cookcountyil.gov](mailto:marie.spicuzza@cookcountyil.gov)

James M. Scanlon  
*Attorney for Chicago Board of Election Commissioners and its Members*  
 27 N. Wacker Drive, Suite 502  
 Chicago, IL 60606  
*Via E-Mail:* [james.scanlon@jmsalaw.com](mailto:james.scanlon@jmsalaw.com)