IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
MACON COUNTY, ILLINOIS

JIM ROOT, Petitioner, v. TONY "CHUBBY" BROWN, as a candidate for Sheriff of Macon County; and JOSH TANNER, as Macon County Clerk Constituting the Election Authority for Macon County, for the General Election held on November 6, 2018, Respondents.	)	*For Court Use Only* Case No. 2018-MR-1027

RESPONDENT TONY "CHUBBY" BROWN'S PREHEARING STATEMENT

NOW COMES the Respondent, TONY "CHUBBY" BROWN, as a candidate for Sheriff of Macon County, by and through his attorneys, Giffin, Winning, Cohen & Bodewes, P.C., and hereby states the following:

1. On November 20, 2018, the County Clerk of Macon County proclaimed the results of the November 6, 2018 General Election for the office of Sheriff of Macon County to be:

Candidate	**Total**
Tony "Chubby" Brown	19,655
Jim Root	19,654

2. As indicated in *Petitioner's Submission as to Remaining Contested Ballots*, a total of 39,738 ballots were declared cast on November 6, 2018.

3. Respondent agreed to a hand recount of all precincts countywide, and, on June 25, 2020, an *Agreed Order* was entered herein, which authorized a full

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manual recount under the supervision and direction of the Macon County Clerk to be conducted of all ballots cast in the November 6, 2018 General Election.

4. On July 24, 2020, the Macon County Clerk filed his *Underlying Report on Recount*, which revealed that a total of 39,739 ballots counted as follows:

	Total
Tony "Chubby" Brown	18,982
Jim Root	18,964
Undervotes	395
Overvotes	4
Contested Ballots	1,337
Uncounted Ballots	57

For clarity, Respondent notes that the *Underlying Report on Recount* identified 1 more ballot than the total proclaimed on November 20, 2018. The reason for this remains unclear.[1]

5. Since the countywide hand recount, the parties have relied primarily on copies of the 1,394 remaining ballots for analysis of the issues herein. The July recount was conducted over several days and, for Respondent BROWN at least, necessarily required the involvement of numerous volunteers, who obtained copies of the remaining contested and uncounted ballots and provided the copies to Respondent BROWN and/or his attorneys. (It is assumed that the process of obtaining copies was not substantially different for Petitioner ROOT.) Counsel for Petitioner kindly provided the parties with Bates-stamped copies of the ballots in his possession for purposes of reference and discussion, which were ultimately submitted to the Court on December 8, 2020 and identified as Petitioner's Demonstrative

[1] See footnote 6, *infra*.

Exhibits 1 & 2 on December 10, 2020. Inasmuch as the actual ballots themselves provide better evidence than the copies, see *Pullen v. Mulligan*, 138 Ill. 2d 21, 72 (1990) ("The ballots, however, are the original evidence of the votes cast."), Respondent is unable to confidently provide precise calculations as Petitioner did in his prehearing submission without going through each of the 1,394 ballots that the Macon County Clerk reported to remain contested or uncounted. Even though we believe that we reconciled the copies of the unresolved ballots that Respondent obtained from various volunteers during the recount with the Bates-stamped copies that Petitioner's counsel shared, it goes without saying that the copies are not the ballots themselves, and we have not foreclosed the possibility that there may be one or more innocent and inadvertent errors with the Bates-stamped copies when compared to the actual ballots. For example, 3 ballots included in Demonstrative Exhibits 1 & 2 as "Decatur 31 000005", "Decatur 31 000006", and "Early Voting Segregated Ballots – Box 2 000008" appear to be undervotes (*i.e.*, no markings indicating a voter preference for either candidate), but it is unclear whether these 3 ballots were among the 1,394 remaining "Contested Ballots" and "Uncounted Ballots" or whether they may have been excluded from that count and inadvertently included within Demonstrative Exhibits 1 & 2.[2] In addition, some of the copies were incomplete, cut off, contained extraneous writings from unknown authors, or may have contained writings on the backsides that were not apparent from the copies. As such, for all of these reasons, Respondent is only able to provide approximations, estimations, and general

[2] See footnote 4, *infra*.

arguments or theories with the aid of reference to Petitioner's Demonstrative Exhibits 1 & 2.

6. Accordingly, Respondent, for purposes of this Prehearing Statement, will simply outline for the Court his position on the various issues raised by Petitioner in *Petitioner's Submission as to Remaining Contested Ballots*, as well as outline his objections and positions as to certain other ballots and ballot types, and will reserve his calculations until after the actual ballots have been marked as exhibits, specific ballots have been objected to by the parties, and copies of all 1,394 ballots have been provided by the Court or the Circuit Clerk's office for reference, so that such calculations can be outlined in his written closing argument that the parties have previously agreed to provide. According to Respondent's preliminary calculations, however, Respondent believes that he would win by 18 if every vote were counted. Nonetheless, Respondent recognizes that the law provides that, for various reasons, a number of the 1,394 remaining ballots ought not be counted. In summary, it is Respondent's position that all 1,394 of the remaining ballots should be counted unless (1) there is a specific objection as to a particular ballot raised for the Court's determination and (2) the law provides that, for whatever reason and without exception, the vote should not be counted.

Marking Ballots & Voter's Intent

7. With regard to the 1,394 contested ballots and uncounted ballots, Respondent agrees, in general, with Petitioner's position that a mark through the oval or box to the left of a candidate's name is not sufficient, in and of itself, to invalidate a vote for either candidate. Counsel for the parties met for 2 days in

October to review the Bates-stamped copies that Petitioner's counsel shared of the contested ballots and uncounted ballots (now Petitioner's Demonstrative Exhibits 1 & 2). Without having reviewed, analyzed, and counted the actual ballots, but instead relying on the October review (and subsequent reviews) of Demonstrative Exhibits 1 & 2, Respondent does not disagree that, judged by the foregoing standard, the Court can anticipate that approximately 1,169± ballots should be removed from contention.[3] would remain undetermined. However, Respondent reserves the right to amend these calculations once, as noted above, the actual ballots have been marked as exhibits, specific ballots have been objected to by the parties, and copies of all 1,394 ballots have been provided by the Court or the Circuit Clerk's office for reference. Such calculations will be outlined in Respondent's written closing argument that the parties have agreed to provide.

8. On December 10, 2020, Petitioner maintained his objections as to a ballot from Decatur 13 (marked as Exhibit 15-D) and a ballot from Decatur 18 (marked as Exhibit 15-F), contending that the marks within the ovals or boxes to the left of Respondent BROWN's name were insufficient to constitute votes. Petitioner, in *Petitioner's Submission as to Remaining Contested Ballots*, contends that there are

[3] In *Petitioner's Submission as to Remaining Contested Ballots*, the term "stipulate" and variations thereof are used throughout the filing. Inasmuch as there have not been any written stipulations presented to the Court, Respondent believes that the term is being used in common parlance to indicate a general, informal, and non-binding lack of disagreement. To the extent that Respondent would be deemed bound by such assertions, Respondent objects to the use of such terms.

2 undervotes.[4] On December 10, 2020, counsel for Petitioner asserted that Exhibit 15-D and Exhibit 15-F should be deemed undervotes, even though both ballots contain markings in the oval or box to the left of Respondent BROWN's name. Respondent asserts that both ballots contain markings that evidence the clearly ascertainable intent of the voters to vote for Respondent BROWN based on the totality of the circumstances and should, therefore, count as votes for Respondent BROWN. See 10 ILCS 5/24B-9.1(b).

9. It is anticipated that there will be at least 4 additional ballots that the Court will be called upon to ascertain the voters' intentions, which are summarized as follows (with references to Petitioner's Demonstrative Exhibits 1 & 2):

- Markings in the ovals or boxes to the left of both candidates' names (Long Creek 3 000010);
- An "X" touching the oval or box to the left of Petitioner ROOT's name and extending into the line on which Respondent BROWN's name is listed (Mt Zion 2 000023);
- A small mark in the oval or box to the left of Petitioner ROOT's name and a solidly filled oval or box to the left of Respondent BROWN's name (Hickory Point 10 000006);

[4] As noted, there are 3 ballots included in Demonstrative Exhibits 1 & 2 as "Decatur 31 000005", "Decatur 31 000006", and "Early Voting Segregated Ballots – Box 2 000008" that appear to be undervotes. *Petitioner's Submission as to Remaining Contested Ballots* indicates "2 ballots were clear undervotes". It is therefore believed that Petitioner is simply engaging in advocacy by characterizing Exhibit 15-D and Exhibit 15-F as the "clear undervotes".

- The oval or box to the left of Petitioner ROOT's name traced and a solidly filled oval or box to the left of Respondent BROWN's name (Long Creek 2 000006); and
- The oval or box to the left of Petitioner ROOT's name traced (Hickory Point 2 000009).

10. Two ballots have been contested because the voters placed an "X" to the right of the candidate's name. They are identified in Petitioner's Demonstrative Exhibits 1 & 2 as "Hickory Point 5 000010" and "Hickory Point 7 00036". The former placed an "X" on the line to the right of Respondent BROWN's name, and the latter placed an "X" on the line to the right of Petitioner ROOT's name. Accordingly, these two ballots offset and should not affect the Court's ultimate decision.

11. On December 10, 2020, the parties agreed that Exhibit 10-D should be counted as a vote for Respondent BROWN and that Exhibit 4-A and Exhibit 31-A should be counted as votes for Petitioner ROOT.

Uninitialed In-Precinct Ballots

12. On page 5 of *Petitioner's Submission as to Remaining Contested Ballots*, Petitioner has submitted that "uninitialed ballots cast in-precinct may not be counted." Respondent agrees with this assertion as a general proposition and agrees, as stated in open court on December 10, 2020, that uninitialed ballots cast in-precinct on election day, without more, ought not be counted. Based on this, there would be more than 100 in-precinct ballots cast in favor of either Respondent BROWN or Petitioner ROOT that should not be counted. On December 10, 2020, the following ballots were identified:

Brown		Root	
Exhibit 24-A	Exhibit 24-B	Exhibit 23-A	Exhibit 23-B
Exhibit 28-A	Exhibit 28-B	Exhibit 29-A	Exhibit 37-A
Exhibit 34-B	Exhibit 36-A	Exhibit 37-B	Exhibit 37-C
Exhibit 36-B	Exhibit 38-A	Exhibit 39-A	Exhibit 47-A
Exhibit 38-B	Exhibit 48-A	Exhibit 47-B	Exhibit 49-A
Exhibit 48-B	Envelope 53	Exhibit 58-B	Exhibit 58-C
Exhibit 57-A	Exhibit 59-A	Exhibit 58-D	Exhibit 60-A
Exhibit 65-A	Exhibit 76-A	Envelope 73	Exhibit 75-A
Exhibit 76-B	Exhibit 76-C	Exhibit 75-B	Exhibit 75-C
Exhibit 76-D	Exhibit 78-A	Exhibit 75-D	Exhibit 77-A
Exhibit 79-A		Exhibit 77-B	Exhibit 80-C

Again, Respondent reserves the right to supplement this list once the remaining ballots have been marked as exhibits, specific ballots have been objected to by the parties, and copies of all 1,394 ballots have been provided by the Court or the Circuit Clerk's office for reference. Such summary of ballots falling into this category of ballots will be provided in Respondent's written closing argument that the parties have agreed to provide.[5]

[5] In the interest of helping speed up the process on the afternoon of December 10, 2020, counsel for Respondent proposed to stipulate that, as a general matter, uninitialed ballots cast in-precinct on election day should not be counted. As counsel also attempted to clarify on that date, it is Respondent's position that there are certain in-precinct ballots that will be presented to the Court that, although they do not bear election judges' initials, should nonetheless be counted for other reasons. Because Respondent's effort to speed up the process seems to have failed, because counsel for Petitioner proceeded (and is expected) to continue to mark as exhibits all ballots cast in-precinct that are potentially objectionable because they lack election judges' initials, because counsel for Respondent's proposed stipulation was somewhat ineloquently stated and subject to exceptions, and because, for purposes of clarity, it seems that the better approach would be for any stipulation to be made in writing (such as by providing a table similar to the one above in Respondent's written closing argument, Respondent wishes to hereby withdraw any stipulation on the issue of uninitialed ballots to the extent that the Court will now allow him to do so.

Uninitialed Mail-In/Absentee Ballots & Early Vote Ballots

13. There are also two types of uninitialed ballots in dispute that were not cast in-precinct, mail-in/absentee ballots and early vote ballots. It is believed that it is Petitioner's position that uninitialed early vote ballots cannot be counted, while uninitialed mail-in/absentee ballots should be counted. Respondent does not agree with Petitioner's premise that "uninitialed ballots cast in-precinct may not be counted" should extend to early vote ballots.

14. In *Craig v. Peterson*, 39 Ill.2d 191 (1968), the Illinois Supreme Court announced an exception to the initialing requirement. A court will consider the initialing requirement to be merely directory and allow the counting of uninitialed absentee ballots if: "(1) the absentee ballots can be identified and distinguished from in-precinct ballots; and (2) the initialling *[sic]* requirement does not contribute to the integrity of the election process." *Pullen v. Mulligan*, 138 Ill. 2d 21, 52 (1990).

15. On December 10, 2020, there were several ballots identified that did not bear an election judge's initials, yet Petitioner conceded that they should be counted as votes for Respondent BROWN. Among those were one from Decatur 8 (marked as Exhibit 15-B), one from Decatur 18 (marked as Exhibit 6-D), and one from Hickory Point 3 (marked as Exhibit 14-L). In each of these instances, it was observed that (1) these ballots were found among the commingled early votes and mail-in/absentee ballots and (2) they had been folded. Thus, Petitioner presumably agreed that, because these ballots were folded, they must have been mail-in/absentee ballots and

should therefore be counted, based on established precedent (*i.e.*, the *Craig* exception).

16. Respondent contends, however, that it defies sound logic and good reason that the efficacy of a vote should be determined solely by whether a ballot was folded or not. In one situation, the postal service is used to deliver the ballot to the County Clerk's staff, and, in the other, the ballot is provided directly by voter himself or herself, who casts his or her vote under the supervision of the County Clerk's staff. Also, because the early votes and mail-in/absentee ballots were commingled, it is clear that they are treated similarly in Macon County. In fact, to some extent, the Election Code requires it to be so. See 10 ILCS 5/1-9 ("all grace period ballots, early voting ballots, vote by mail ballots, and provisional ballots to be counted shall be delivered to and counted at an election authority's central ballot counting location and not in precincts."). Thus, consistent with the holding in *Craig*, the early votes and mail-in/absentee ballots can be identified and distinguished from Macon County's in-precinct ballots, and, Respondent asserts, the initialing requirement for early votes in Macon County does not contribute to the integrity of the November 6, 2018 election process. See *DeFabio v. Gummersheimer*, 192 Ill. 2d 63, 66 (2000) (stating that the Illinois Supreme Court "has permitted relaxation of the mandatory initialing requirement under very limited circumstances. Specifically, this court has permitted the counting of only uninitialed absentee ballots that are easily distinguished from in-precinct ballots.").

17. In this case, the integrity of the November 6, 2018 election process is not implicated by Petitioner's pleadings at issue herein. As in *Craig*, the only irregularity

with regard to early vote ballots complained of is the absence of the election judges' initials. Although Petitioner's *Verified Election Contest Petition* initially contained generalized and non-specific allegations of fraud, all allegations of fraud were stricken by the Court in its June 28, 2019 *Memorandum Opinion and Order* because such allegations were unsupported by specific facts. Since the June 2019 Order was entered, Petitioner has never amended his Petition or requested leave to do so. Thus, as such, there are no allegations before the Court that any ballots were illegally cast. See *Pullen*, 138 Ill. 2d at 52-53 ("the initials provide the only means by which the election officials can identify and separate the legally cast from the illegally cast in-precinct ballots."). Accordingly, voter fraud and the integrity of the November 6, 2018 election process in Macon County are not implicated by the pleadings at issue herein. See *id.*, 138 Ill. 2d at 53 ("Here, as in *Craig*, neither party questioned the legitimacy of the uninitialed absentee ballots or alleged any fraud or other irregularity. Accordingly, under the reasoning adopted in *Craig*, application of the initialing requirement is not necessary to preserve the integrity of the election process.").

18. Moreover, put into historical context, it makes sense that the holding in *Craig* and its progeny ought to be extended to early voting. Early voting is governed by Article 19A of the Election Code. 10 ILCS 5/19a-5, *et seq.* Article 19A was added by Public Act 94-645, § 5, which became effective August 22, 2005. In short, *Craig*, *Pullen*, and other cases discussing the *Craig* exception were decided prior to Article 19A becoming effective, and there are no reported decisions regarding the *Craig*

exception to the initialing requirement as applied to early ballots that were not cast in-precinct.

19. Respondent contends that all uninitialed early vote ballots should be counted. See Appendix 1 hereto.

"Substantial Compliance" & Actions of Election Judges

20. Returning to in-precinct ballots, there were 4 ballots identified on December 10, 2020 that had writing in the boxes for the election judges' initials but, nonetheless, did not bear election judge's initials. A Decatur 22 ballot (Exhibit 63-A) had "22" written in the space for the election judge's initials. A Decatur 19 ballot (Exhibit 58-A) had "19" written in the space for the election judge's initials. Finally, 2 Decatur 30 ballots (Exhibit 80-A & Exhibit 80-B) had "30" written in the spaces for the election judge's initials. On December 10, 2020, counsel for Petitioner submitted that these ballots should be counted under the doctrine of substantial compliance. (Petitioner's Demonstrative Exhibits 1 & 2 contains another similar ballot identified as "Hickory Point 7 000035".)

21. If the Court accepts Petitioner's "substantial compliance" argument, then an electronic in-precinct ballot was found in Decatur 12 but indicates that it is a Decatur 1 ballot. This ballot is identified by Petitioner's Demonstrative Exhibits 1 & 2 as "Decatur 12 000009". Respondent believes that the evidence will establish that the Decatur 1 and Decatur 12 precincts are not collocated, meaning that these precincts do not share a polling place. Respondent also believes that the evidence will establish that this ballot is the result of a touchscreen system, and this particular voter could (or must) have entered "Decatur + 1 + Enter" instead of "Decatur + 1 + 2

+ Enter". Respondent also believes that the evidence will establish that the voting machine would have allowed a voter registered in Decatur 12 to vote a Decatur 1 ballot but would not have counted it.[6] Insofar as Petitioner has advocated the counting of ballots based on substantial compliance, Respondent submits that this particular voter substantially complied in casting his vote, and the vote should be counted.

22. There are several ballots that have notes written on them. For example, Exhibit 18-D has "Spoiled Ballot Duplicate #1" written in the upper left corner of the ballot, and it bears 2 election judges' initials. It is anticipated that there will be other ballots identified that bear election judges' initials and have written at the top of the ballot (with references to Petitioner's Demonstrative Exhibits 1 & 2):

- "Duplicated Damaged Ballot #1" (Hickory Point 7 000003)
- "Duplicated Damaged Ballot #2" (Hickory Point 7 000016)
- "Duplicated Damaged Ballot #3" (Hickory Point 7 000002)
- "Duplicated Damaged Ballot #4" (Hickory Point 7 000017)
- "Ballot – 2 Remake 2" (Long Creek 3 000002)
- "Ballot 4 Remake 4" (Long Creek 3 000011)
- "Ballot 5 Remake 5" (Long Creek 6 000047)
- "Ballot 6 Remake 6" (Long Creek 3 000012)
- "Ballot 7 Remake 7" (Long Creek 6 000049)
- "Remake 8" (Long Creek 6 000048)

[6] Perhaps this is why the *Underlying Report on Recount* identified 1 more ballot than the total proclaimed on November 20, 2018.

Under Petitioner's theory of "substantial compliance", these votes should all be counted as well. More importantly, however, these votes should not be left uncounted simply because an election judge wrote on the ballots and may have used incorrect terminology.

23. "A voter will not be disfranchised simply because some unauthorized person, regardless of his innocent intention, has deliberately placed marks on a ballot." *Pullen v. Mulligan*, 138 Ill. 2d 21, 69 (1990). "As a general rule, ignorance, inadvertence, mistake, or even intentional wrong on the part of election officials will not be permitted to disfranchise voters." *Id.*, 138 Ill. 2d at 70.

24. Respondent anticipates that the evidence herein will establish that, but for the actions of precinct-level election judges doing what they believed to be right to cure issues with validly-cast ballots, and had the election judges not felt the need to write out explanations on the ballots, these ballots would properly be counted. Established law provides that the voters should not be penalized by having their votes not count.

25. Along similar lines, Exhibit 34-A (an electronic ballot) has "Remade #1" written on the back of it but no election judge's initials. Although it was apparently cast in-precinct, it says "EARLY VOTING" at the top. There are several other in-precinct ballots that have "EARLY VOTING" written at the top of the electronic ballot and, like Exhibit 34-A, have "Remake #__" written on the back of them but no election judge's initials. They are currently identified by Petitioner's Demonstrative Exhibits 1 & 2 as "Hickory Point 7 000018", "Hickory Point 7 000019", and "Hickory Point 7

000020". It is anticipated that the testimony will establish that these ballots would have been remade at the Circuit Clerk's office on election night after the ballots were delivered from the precincts. Again, it appears that the voters who cast these ballots did everything that they were supposed to do, and, therefore, they should not be penalized due to the actions of well-intentioned election judges.

Ballots That Should Not Be Counted

26. "Our constitution states that '[t]he General Assembly by law shall * * * insure secrecy of voting and the integrity of the election process * * *.'" *Pullen*, 138 Ill. 2d at 68 (quoting Ill. Const.1970, art. III, § 4). The Appellate Court recently reaffirmed:

> Ballot secrecy is one of the most important protections for a voter because it ensures that a voter may vote his or her conscience, regardless of the person's public persona. For example, a person standing on a public street, wearing a shirt supporting "party A's" candidate and vocally encouraging others to vote for party A's candidate, is still protected from any potential consequences should he or she in fact choose to vote for party B's candidate. T-shirts and public proclamations do not have the effect of casting a vote for a candidate, only the ballot has that power. Therefore, ballot secrecy is of the utmost importance in protecting our system of democracy.

Oettle v. Guthrie, 2020 IL App (5th) 190306, ¶ 14.

27. There are 2 ballots that were cast in violation of voter secrecy. They are identified by Petitioner's Demonstrative Exhibits 1 & 2 as "Decatur 32 000007" and "Hickory Point 4 000003". Both are in-precinct electronic ballots, and election judges initialed the fronts of both ballots after they were printed and before they were deposited into the ballot box. By initialing the fronts of the ballots, the election judges

had plain view of voters' selections on the ballots, and ballot secrecy was not preserved.

28. In the vein of ballot secrecy, Section 24B-9.1 of the Election Code specifically provides that "a mark is an intentional darkening of the designated area on the ballot, and not an identifying mark." 10 ILCS 5/24B-9.1. "Our courts have consistently held that any deliberate marking of a ballot by a voter, not made to indicate his choice for a candidate, and which is effective as a mark by which his ballot may be distinguished, is a distinguishing mark which invalidates the ballot." *Pullen*, 138 Ill. 2d at 69. Here, the Court could review all 1,394 of the ballots before it and not find a single ballot that is similar to the one identified by Petitioner's Demonstrative Exhibits 1 & 2 as "South Wheatland 2 000006". On this ballot, the voter used asterisks. This ballot obviously contains identifying marks and should not be counted.

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Conclusion

WHEREFORE, the Respondent, TONY "CHUBBY" BROWN, as a candidate for Sheriff of Macon County, prays that this Court deny the Petitioner's *Verified Election Contest Petition*, enter judgment in his favor, and grant such other and further relief as may be equitable and just.

Respectfully Submitted,

TONY "CHUBBY" BROWN, as a candidate for Sheriff of Macon County, Respondent

By: /s/ Christopher E. Sherer
One of His Attorneys

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"Appendix 1"

Brown		Root	
Exhibit 6-A	Exhibit 6-B	Exhibit 5-A	Exhibit5-B
Exhibit 6-C	Exhibit 10-A	Exhibit 5-C	Exhibit 5-D
Exhibit 10-B	Exhibit 10-C	Exhibit 9-A	Exhibit 9-B
Exhibit 10-E	Exhibit 8-A	Exhibit 9-C	Exhibit 9-D
Exhibit 8-B	Exhibit 8-C	Exhibit 9-E	Exhibit 9-F
Exhibit 8-D	Exhibit 14-A	Exhibit 13-A	Exhibit 13-B
Exhibit 14-B	Exhibit 14-D	Exhibit 13-C	Exhibit 13-D
Exhibit 14-E	Exhibit 14-F	Exhibit 13-E	Exhibit 13-F
Exhibit 14-G	Exhibit 14-H	Exhibit 13-G	Exhibit 14-C
Exhibit 14-I	Exhibit 14-J	Exhibit 16-A	Exhibit 16-B
Exhibit 14-K	Exhibit 14-M	Exhibit 16-C	Exhibit 16-D
Exhibit 15-A	Exhibit 15-C	Exhibit 16-E	Exhibit 21-A
Exhibit 15-E	Exhibit 15-G	Exhibit 21-B	Exhibit 21-C
Exhibit 15-H	Exhibit 15-I	Exhibit 21-D	Exhibit 21-E
Exhibit 15-J	Exhibit 15-K	Exhibit 23-A	Exhibit 23-B
Exhibit 18-A	Exhibit 18-B		
Exhibit 18-C	Exhibit 18-E		
Exhibit 20-A	Exhibit 20-B		
Exhibit 20-C	Exhibit 20-D		
Exhibit 20-E	Exhibit 24-A		
Exhibit 24-B			

See Petitioner's Demonstrative Exhibits 1 & 2 (Early/Provisional Contested 000007).

CERTIFICATE OF FILING AND PROOF OF SERVICE

I hereby certify that on December 17, 2020, I caused to be submitted the foregoing document for filing with the Circuit Clerk for the Sixth Judicial Circuit, Macon County, Illinois by using the Odyssey eFileIL system.

I further certify that the following were served via email on the above date:

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Under penalties as provided by law pursuant to section 1-109 of the Illinois Code of Civil Procedure, I certify that the statements set forth in this instrument are true and correct to the best of my knowledge.

By: /s/ Christopher E. Sherer
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