

IN THE CIRCUIT COUR FOR ANNE ARUNDEL COUNTY

PETITION OF IAN SCHLAKMAN *
1101 St. Paul Street, #2009 *
Baltimore, Maryland 21202 *

and *

FRANK W. RICHARDSON *
2624 St. Paul Street. Apartment 1A *
Baltimore, Maryland 21218 *

FOR JUDICIAL REVIEW OF THE *
DECISION OF MARYLAND STATE *
BOARD OF ELECTIONS *
151 West Street, Suite 200 *
Annapolis, Maryland 21401 *

* * * * *

SWORN PETITION FOR JUDICIAL REVIEW

Ian Schlakman and Frank W. Richardson (collectively “Petitioners”), by their attorney, petition this Court pursuant to Maryland Rule 7-202 and Maryland Election Law Code 9-209 for judicial review of the decision of the Maryland State Board of Elections (“Board”) to include the name of Dan Sparaco on the ballot for the November 8, 2016, General Election as a candidate for the Baltimore City Council in Councilmanic District 12.

Mr. Schlakman and Mr. Richardson were not parties to the agency decision. However, Mr. Schlakman and Mr. Richardson have standing to seek judicial review of the content of the ballot pursuant to Maryland Election Law Code § 9-209. Both Mr. Schlakman and Mr. Richardson are registered voters in Baltimore City and also are candidates for the Baltimore City Council in Councilmanic District 12. Mr. Schlakman and Mr. Richardson challenge the Board’s decision to include Mr. Sparaco’s name on the General Election ballot on the ground that Mr. Sparaco, a candidate who sought nomination by petition pursuant to Maryland Election Law Code § 5-703

failed to file a Declaration of Intent by the February 3, 2016, deadline specified by Maryland Election Law Code § 5-703(c)(3)(ii), and, thus, is ineligible to be listed as a candidate on General Election ballot for the Baltimore City Council in Councilmanic District 12.



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VERIFICATION

**I, IAN SCHLAKMAN, swear under penalty of perjury that the contents of the forgoing
Petition are true and correct**



IAN SCHLAKMAN
Dated: September 16, 2016

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 16th day of September, 2016, a copy of the foregoing
Petition for Judicial Review was hand delivered, to:

Jeffrey L. Darsie
Assistant Attorney General of Maryland
200 St. Paul Place, 20th Floor
Baltimore, Maryland 21202




H. MARK STICHEL

ATTORNEY FOR PETITIONERS

MARYLAND RULE 20-201(f) CERTIFICATE

I HEREBY CERTIFY that this submission does not contain any restricted information.



H. MARK STICHEL

ATTORNEY FOR PETITIONERS