

**IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT  
MCLEAN COUNTY, ILLINOIS**

ROBERT SHORAGA	)	
	)	
Plaintiff.	)	
	)	23-MR-_____
TOWN OF NORMAL, ANGIE HUONKER,	)	
	)	
Defendants.	)	

**EMERGENCY VERIFIED PETITION FOR  
TEMPORARY RESTRAINING ORDER**

NOW COMES, Petitioner, Robert Shoraga, (hereinafter referred to as “Candidate”) by and through his attorneys Thomas G. DeVore, and the Silver Lake Group, Ltd., and for his Verified Petition for Temporary Restraining Order against Respondents, Town of Normal (hereinafter referred to as the “Town”) and Angie Huonker (hereinafter referred to as “Huonker”), (collectively both shall be hereinafter referred to as the “Respondents”) and hereby alleges as follows:

1. Contemporaneously with the filing of this Petition the Candidate has filed a Verified Complaint for Mandamus, which verified complaint is hereby incorporated herein as if it has been specifically plead.
2. The Candidate has a right to have his nominating papers certified to the county election officials so that his name appears on the April 2023 ballot.
3. There can be no doubt the Defendants are disregarding state law by proclaiming their local election code is superior.
4. The Illinois legislature has mandated the office for with the Candidate is seeking to be on the ballot is elected by the residents of the Town.
5. None of the Defendants have any lawful authority to refuse to certify the nominating papers of

the Candidate merely because the election code of the Town fails to recognize this elected office as required by state law.

6. The Candidate has no adequate remedy at law in which to seek relief from the irreparable harm to be caused by failure to certify the Candidates nominating papers to the county election officials by January 26, 2023.
7. By the time this Court resolves this matter on the merits it will be too late and the candidate will have lost her right to be on the ballot irreversibly.
8. Should the Court ultimately rule in favor of the Defendants, the county clerk has some ability to address that issue on or before the middle of February.
9. The Candidate has proven a likelihood of success on the merits that the Defendants all lack authority to refuse to certify the Candidates nominating papers for this elected office.
10. The citizens of the Town have a right under Illinois law to choose their candidate for this office by election.
11. The Candidate has a right to be placed on the ballot as no defects have been raised in the nominating papers for any failure to comply with the Illinois Election Code.
12. For all these reasons, balancing the equities in this cause bodes completely in favor of granting the Candidate the emergency requested relief.

WHEREFORE, the Candidate herein request that this court enter an Order:

- A. Finding the Candidate has a right to have their name placed on the ballot given there has been no facial defect raised in the nominating papers as required by the Illinois Election Code;
- B. Finding the Defendants, under the facts presented herein, are not lawfully authorized to disregard state law.
- C. Finding no adequate remedy at law exists to address this matter before the deadline of January

26, 2023.

- D. Finding the Candidate has proven a likelihood of success on the merits as Illinois law is clear this is an elected office for which the Town cannot disregard.
- E. Enter a temporary restraining order enjoining the Town and/or Huonker to certify the Candidates name to appear on the ballot for the sought elected office with the county election officials before January 26, 2023.
- F. For such other relief as this Court deems just and proper.

Respectfully submitted,

/s/ Thomas G. DeVore  
IL Bar No. 06305737  
Silver Lake Group, Ltd.  
118 N. 2nd St.  
Greenville, IL 62246  
Telephone - 618-664-9439  
[tom@silverlakelaw.com](mailto:tom@silverlakelaw.com)

## VERIFICATION

Under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct except as to matters therein stated to be on information and belief, if any, and as to such matters the undersigned certifies as aforesaid that the undersigned verily believes the same to be true.

Date: January 04, 2023

By: /s/ Robert Shoraga  
ROBERT SHORAGA

Thomas G. DeVore  
Counsel for Plaintiffs  
IL Bar No. 06305737  
Silver Lake Group, Ltd.  
118 N. 2nd St.  
Greenville, IL 62246  
Telephone - 618-664-9439  
Facsimile 618-664-9486  
[tom@silverlakelaw.com](mailto:tom@silverlakelaw.com)