STATE OF INDIANA)	ST. JOSEPH CIRCUIT/SUPERIOR COURT
ST. JOSEPH COUNTY)	CAUSE NO. 71C01-1805-MI-000168
IN RE: THE NOMINATION OF THE DEMOCRATIC PARTY TO OFFICE OF SHERIFF OF ST. JOSEPH COUNTY:	
TIM CORBETT,)
Petitioner,)
-And-	
BILL REDMAN,	
Respondent,)
WILLIAM (BILL) THOMPSON	J,)
Respondent.)

VERIFIED PETITION FOR RECOUNT

Petitioner, Tim Corbett ("Corbett"), by his undersigned attorneys, respectfully submits this Verified Petition for Recount ("Petition") pursuant to Indiana Code § 3-12-6-1 et seq. Corbett requests a recount of the votes cast in the primary election held on May 8, 2018 for the nomination of the Democratic Party to the office of Sheriff of St. Joseph County. In support of the Petition, Corbett states as follows:

1. The office for which Corbett desires a recount is the nomination of the Democratic Party to the Office of Sheriff of St. Joseph County, as voted for in the primary election held on May 8, 2018.

- 2. Corbett desires a recount in every precinct in St. Joseph County. A list of those 225 precincts is set forth on Exhibit A attached hereto and incorporated herein.
- 3. The certified results of the election in each precinct and overall are set forth in Exhibit B attached hereto and incorporated herein.
 - 4. Corbett is entitled to a recount under I.C. § 3-12-6-1.
- 5. The nomination of the Democratic Party to the Office of Sheriff of St. Joseph County was voted upon in each of the precincts set forth in paragraph 2 and Exhibit A of this Petition.
- 6. The name of each candidate for the nomination as set forth on the ballot for the election and the address of each candidate for the nomination as set forth in the records of the St. Joseph County Election Board are as follows:
 - a. Tim Corbett 50893 Sharpstone Ct., Granger IN 46530;
 - b. Bill Redman 5711 Trippel Dr., Mishawaka, IN 46545; and
 - c. William (Bill) Thompson, 1304 Apple Ridge Ct., South Bend, IN 46614.
- 7. Corbett in good faith believes that the votes cast for the nomination were not correctly counted and returned.
- 8. Corbett desires a recount of the votes cast in every precinct in St. Joseph County for the nomination of the Democratic Party to the Office of Sheriff of St. Joseph County in the May 8, 2018, primary election.

- 9. Pursuant to I.C. § 3-12-6-21.5, Corbett requests that the ballot cards in each precinct set forth in paragraph 2 and Exhibit A be counted manually.
- 10. Corbett herewith furnishes the cash deposit required by I.C. § 3-12-6-10(a) and (b) as the difference between the number of votes cast for the candidate nominated and Corbett is not more than 1% of the total votes cast for all candidates for nomination to the office. The total cash deposit furnished is \$2,250.00 as there are 225 precincts to be recounted.

WHEREFORE, Corbett respectfully requests that this Court:

- a. Grant the Petition and order a manual recount of every precinct in St. Joseph County for the May 8, 2018, primary election for the nomination of the Democratic Party to the office of Sheriff of St. Joseph County, pursuant to the recount procedures set forth by statute in I.C. § 3-12-6-1 et seq.
- b. Grant such further relief pursuant to I.C. § 3-12-6-1 et seq. and as otherwise may be just and proper.

Respectfully submitted:

<u>/s/ William R. Groth</u>

Daniel H. Pfeifer (5720-71)

William R. Groth (#7325-49)

David T. Vlink (#30182-45)

Attorneys for the Petitioner, Tim Corbett

FILLENWARTH DENNERLINE GROTH & TOWE, LLP 429 E. Vermont Street, Suite 200 Indianapolis, IN 46202

Phone: (317) 353-9363

PFEIFER, MORGAN & STESIAK 53600 N. Ironwood Drive

South Bend, IN 46635 Phone: (574) 272-2870

Fax: (574) 271-4329

Fax: (317) 351-7232

E-mail: wgroth@fdgtlaborlaw.com

dvlink@fdgtlaborlaw.com

VERIFICATION

I affirm under the penalties for perjury that the foregoing representations in this Petition are true and accurate to the best of my knowledge and belief.

Tim Corbett, Petitioner