

NO. 26-CI-00_____
FILED ELECTRONICALLY

JEFFERSON CIRCUIT COURT
DIVISION _____ ()
JUDGE _____

JAMES CRAIG

PETITIONER

v. **PETITION TO DISQUALIFY SCHOOL BOARD CANDIDATE
PURSUANT TO KRS 118.176**

GAY PERRY-ADELMANN

RESPONDENTS

Serve: Gay Perry-Adelmann
9111 Hurstwood Court
Louisville, Kentucky 40222

and

JEFFERSON COUNTY BOARD OF ELECTIONS

Serve: David Yates, Chair
Jefferson County Board of Elections
527 West Jefferson Street
Louisville, Kentucky 40202

and

DAVID YATES, in his official capacity as
JEFFERSON COUNTY CLERK

Serve: David Yates, Chair
Jefferson County Board of Elections
527 West Jefferson Street
Louisville, Kentucky 40202

* * * * *

1. James Craig petitions this Court pursuant to KRS 118.176 to determine that
Respondent Gay Perry-Adelmann is not a bona fide candidate for the Jefferson County Board of
Education, District 3.

2. Petitioner further requests that the Court certify its findings to the Jefferson County Clerk and the Jefferson County Board of Elections, order Respondent's name stricken from the ballot and all official lists of candidates, enjoin election officials from placing or maintaining Respondent's name on the ballot, and enjoin election officials from tabulating or reporting any votes cast in her favor.

JURISDICTION AND VENUE

3. This Court has jurisdiction pursuant to KRS 118.176.

4. Venue is proper in the Commonwealth of Kentucky, Jefferson Circuit Court because Respondent resides in Jefferson County.

5. KRS 118.176 requires this Court to conduct an expedited summary proceeding to determine whether Respondent is a bona fide candidate.

PARTIES

6. Petitioner James Craig is a citizen of Jefferson County and a qualified voter eligible to vote in the District 3 School Board election. He is the former elected member of the Jefferson County Board of Education for District 3, residing at 10721 Colonial Woods Court, Louisville, Kentucky 40223.

7. Respondent Gay Perry-Adelmann filed as a candidate for the Jefferson County Board of Education, District 3. On her nominating petition, Adelmann lists her home address as 9111 Hurstwood Court, Louisville, Kentucky 40222. A copy of her petition is attached as Exhibit A.

8. Respondent Jefferson County Clerk is responsible for ballot preparation and election administration in Jefferson County.

9. Respondent Jefferson County Board of Elections administers elections in Jefferson County.

GOVERNING LAW AND FACTUAL BACKGROUND

10. KRS 160.210 requires that a candidate for a district seat on a county board of education be a voter residing within the district he or she seeks to represent. The statute provides: “To be eligible to be elected from a division, a candidate shall reside in that division.”

11. Kentucky law likewise authorizes any qualified voter entitled to vote for the office to challenge whether a candidate is a bona fide candidate under KRS 118.176.

12. Respondent filed a Nominating Petition seeking election to the Jefferson County Board of Education from District 3. A copy of the Nominating Petition is attached as Exhibit A.

13. At the time Respondent filed her candidacy and today, Respondent did and does not reside within Board District 3.

14. Publicly available governmental records, including the online LOGIC mapping tool offered in coordination between Louisville Metro Government and the Jefferson County Clerk’s Office, demonstrate that Respondent’s address is located within School Board District 2, not District 3. A copy is attached as Exhibit B.

15. Jefferson County Public School’s online school board member locator demonstrates that Respondent’s address is located within School Board District 2, not District 3. A copy is attached as Exhibit C.

16. Because Respondent resides outside District 3, she does not satisfy the statutory qualifications to serve as the District 3 board member.

17. Accordingly, Respondent is not a bona fide candidate for the office she seeks.

FIRST CLAIM FOR RELIEF

18. Petitioner incorporates all preceding paragraphs as if set forth fully herein.
19. KRS 118.176 authorizes this Court to determine whether Respondent is a bona fide candidate.
20. Because Respondent does not satisfy the statutory residency qualification for District 3, Respondent is legally ineligible to hold that office.
21. Allowing Respondent's name to remain on the ballot would cause immediate and irreparable injury by permitting an ineligible candidate to appear before the electorate.
22. Petitioner is entitled to declaratory and injunctive relief declaring Respondent is not a bona fide candidate and directing election officials to remove Respondent's name from the ballot and to not count any votes cast in her favor.

PRAYER FOR RELIEF

Wherefore, Petitioner respectfully requests:

1. An expedited hearing pursuant to KRS 118.176;
2. A declaration that Respondent is not a bona fide candidate for Jefferson County Board of Education District 3;
3. An order declaring Respondent's Notification and Declaration null and void;
4. Certification of the Court's ruling to the Jefferson County Clerk and Jefferson County Board of Elections;
5. An injunction prohibiting election officials from tabulating or certifying votes for Respondent; and
6. Costs expended herein and all other appropriate relief.

Respectfully submitted,

s/ James Craig

James Craig, KBA #90413

The Craig Firm

Waterfront Plaza Building, Suite 1808

325 West Main Street

Louisville, KY 40202

(502) 544-5667

james@craigfirm.com

Pro se

CERTIFICATE OF SERVICE

I certify that on July 14, 2026, a copy of the foregoing was filed electronically with the Clerk of Court using the KCOJ e-filing system and was served, pursuant to CR 4 and 5, to the following:

Gay Perry-Adelmann
9111 Hurstwood Court
Louisville, Kentucky 40222
sv.nomad.421@proton.me

s/ James Craig

Pro se



NOMINATING PETITION

(Certain Independent candidates or Non-Partisan candidates required to file with County Clerk)

This Space for Filing Officer Only

RECEIVED

2026 JUN -1 P 1:47

JEFFERSON COUNTY CLERK
ELECTION CENTER

To David Yates Commonwealth of Kentucky, Jefferson County:
(County Clerk)

We, the undersigned petitioners, being voters of the same district or jurisdiction from which the candidate seeks nomination, and being at least 2 in number, hereby petition you to cause to be printed on the official

ballot of said county/counties _____ of the Commonwealth of Kentucky at the primary/regular election

to be held on Nov 3 2026 the name of Gay Perry-Adelmann who
(Month) (Day)

resides at 9111 Hurstwood Ct Louisville, KY 40222,
(Residential Address) (City, State, Zip)

whose email address or post office box address is sv.nomad.421@proton.me,
(Post Office Box Address or Email Address)

as a candidate for the office of JCPS BOE district 3

I, Gay P. ~~Perry~~ Adelmann, hereby declare that I
(Name of candidate in full as desired on ballot as provided in KRS 118.129)

possess all the constitutional and statutory requirements for the office for which I have filed.

Gay Perry-Adelmann
(Signature of Candidate)

AFFIDAVIT FOR SCHOOL BOARD CANDIDACY AND MEMBERSHIP

COMMONWEALTH OF KENTUCKY

COUNTY OF Jefferson

I, Gay P. Adelman, after being duly sworn, state as follows:
(Name of Candidate)

1. That I certify that I possess the eligibility requirements as set forth in KRS 160.180 for membership on a board of education. I understand that no person shall be eligible to membership on a board of education:

Unless the person has attained the age of twenty-four (24) years; and unless the person has been a citizen of Kentucky for at least three (3) years preceding his or her election and is a voter of the district for which he or she is elected; and who holds any elective federal, state, county or city office; or who, at the time of his or her election, is directly or indirectly interested in the sale to the board of books, stationery, or any other property, materials, supplies, equipment, or services for which school funds are expended; or who has been removed from membership on a board of education for cause; or who has a *relative employed by the school district and is elected after July 13, 1990. However, this shall not apply to a board member holding office on July 13, 1990, whose relative was not initially hired by the district during the tenure of the board member.

*** Relative means: father, mother, brother, sister, husband, wife, son and daughter.**

And, I do further state the following:

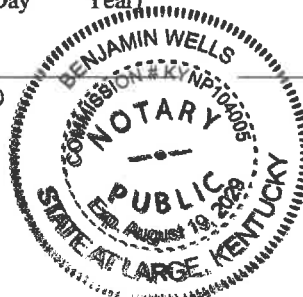
2. That I certify that I have completed the twelfth (12th) grade or the equivalent as determined by passage of the twelfth (12th) grade equivalency examination (GED).
3. That I am providing this certificate under penalty of perjury.

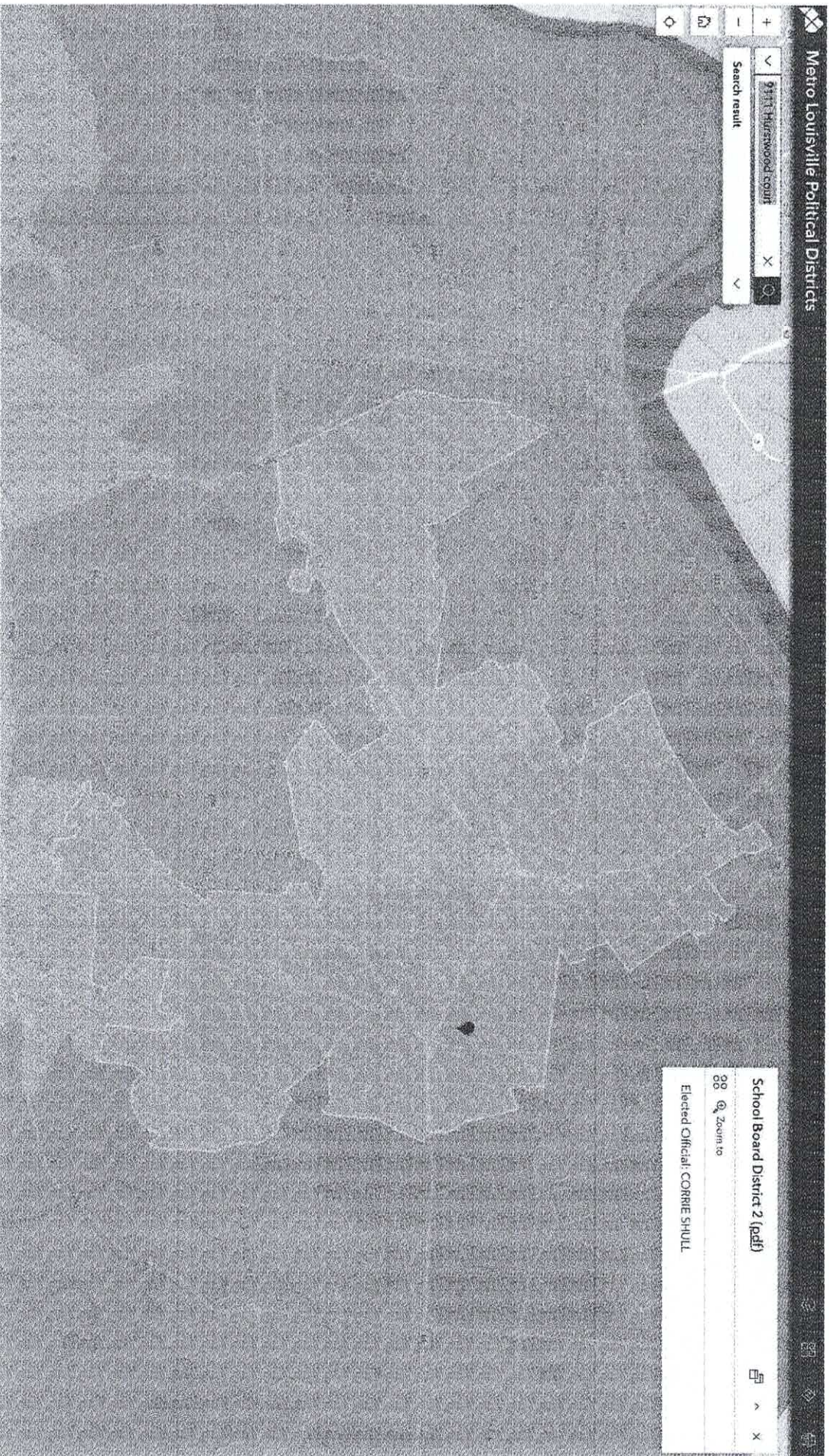
Gay Perry Adelman
(Signature of Candidate)

Subscribed and sworn to before me by Gay Perry Adelman
on this date of 05 29 2026.
(Month Day Year)

[Signature]
(Signature of Notary Public)

19 Aug 2029
(Commission Expiration Date)





Find a Board District

Enter an address below to identify its board district.

