

**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

**IN RE: THE NOMINATION PETITIONS OF** : **ELECTION MATTER**  
**NORBERTO DOMINGUEZAS A DEMOCRATIC** :  
**CANDIDATE FOR STATE REPRESENTATIVE** : **DOCKET NO:**  
**IN THE 22<sup>nd</sup> LEGISLATIVE DISTRICT** : **MD 2022**

**PETITION TO SET ASIDE NOMINATING PETITIONS**

AND NOW, come Petitioners, by their counsel, Lawrence M. Otter, Esquire, and file the within Objections to Nomination Petition and, in support thereof avers as follows:

1. Exclusive jurisdiction over the subject matter of this Petition is vested in the Commonwealth Court of Pennsylvania by the provisions of the **Pennsylvania Election Code, 25 P. S. § 2937**, and the provisions of the **Judicial Code, 42 Pa. C. S. A. § 764**.
2. One Petitioner is John Santana, who resides at 925 Chew St, Allentown, PA and is a duly registered and enrolled Democratic elector of the Commonwealth of Pennsylvania who votes and resides in the 22<sup>nd</sup> Legislative District.
3. One Petitioner is Carmen Urbaez, who resides at 925 Chew St, Allentown, PA and is a duly registered and enrolled Democratic elector of the Commonwealth of Pennsylvania who votes and resides in the 22<sup>nd</sup> Legislative District.
4. One Respondent is Norberto Dominguez a candidate for State Representative in the 22<sup>nd</sup> Legislative District who as of March 28, 2022, allegedly resides at , 415 Allen Rd., Allentown, PA 18102 .
5. One Respondent is the Secretary of the Commonwealth, whose office is located at 305 North Office Building, Harrisburg, Pennsylvania.

6. On or about March 28, 2022, Nominating Petitions and Papers were filed with the Pennsylvania Department of State, Bureau of Elections, nominating Respondent, Norberto Dominguez as a Democratic candidate for State Representative in the 22<sup>nd</sup> Legislative District.
7. The nominating Petitions and Papers are purported to consist of 18 petition pages and allegedly containing 350 lines of signatures of electors supporting the nomination of Norberto Dominguez, Respondent.
8. Three Hundred (300) valid signatures of qualified electors who reside within the 139<sup>th</sup> Legislative District are required by statute, **25 P. S. §2872.1 (14)** to support the Nominating Petitions and Papers of Norberto Dominguez, in the Democratic Primary Election scheduled for May 17, 2022.
9. The Nominating Petitions and Papers of Respondent, Norberto Dominguez, are invalid and inadequate in that they contain less than 300 valid signatures and because of various inadequacies and deficiencies as outlined in a spreadsheet attached hereto and incorporated as **Exhibit A**.
10. **Exhibit A** lists 157 challenges to the 350 lines in Dominguez's petitions. The challenges are as listed but the NR (45) and NRA (72) objections and line strikes (20) are over 51 lines which is sufficient to remove Respondent from the ballot

**WHEREFORE**, Petitioner prays this Honorable Court to set aside the Nominating Petitions and Papers of Respondent, Norberto Dominguez, for failure to obtain the minimum number of valid signatures (300) for the office of State Representative and to order that her name not appear on the ballot for nomination as the Democratic Party candidate for State Representative in the

22<sup>nd</sup> Legislative District.

Respectfully submitted,

/s/ Lawrence M. Otter, Esq.

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LAWRENCE M. OTTER, ESQUIRE  
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IN THE COMMONWEALTH COURT OF PENNSYLVANIA

IN RE: THE NOMINATION PETITIONS OF : ELECTION MATTER  
NORBERTO DOMINGUEZAS A DEMOCRATIC :  
CANDIDATE FOR STATE REPRESENTATIVE : DOCKET NO:  
IN THE 22<sup>nd</sup> LEGISLATIVE DISTRICT : MD 2022

ORDER

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2022, it is hereby **ORDERED**  
**that** the Nominating Petitions and Papers of Norberto Dominguez as a Candidate for State  
Representative in the 22nd Legislative District be and hereby are stricken and dismissed, and

FURTHER ORDERED

that the name of respondent Norberto Dominguez not appear on the ballot for the May 17, 2022  
Primary Election for the Democratic Party candidate for State Representative in the 22nd  
Legislative District.

BY THE COURT

\_\_\_\_\_  
J.

**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

**IN RE: THE NOMINATION PETITIONS OF                                    : ELECTION MATTER  
NORBERTO DOMINGUEZAS A DEMOCRATIC                                 :  
CANDIDATE FOR STATE REPRESENTATIVE                               : DOCKET NO:  
IN THE 22<sup>nd</sup> LEGISLATIVE DISTRICT   :                       MD 2022**

**CERTIFICATE OF SERVICE**

Lawrence M. Otter, Esquire, counsel for Petitioner, hereby certifies that a true and correct copy of the within Petition with proposed order affixed thereto was duly served by Federal Express Overnight Mail, postage prepaid or as otherwise noted on April 4 , 2022 upon the following:

BY HAND

Secretary of the Commonwealth  
305 North Office Building  
Harrisburg, PA 17120-0029

/s/ Lawrence M. Otter. Esq.

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LAWRENCE M. OTTER, ESQUIRE  
ATTORNEY FOR PETITIONERS  
PO BOX 575  
SILVERDALE, PA 18962  
267-261-2948  
Email: [larryotter@hotmail.com](mailto:larryotter@hotmail.com)

# EXHIBIT A

The objection petition shall specify objections to individual signature lines in nomination petitions or papers and these shall be set forth in an EXCEL® or other similar spreadsheet format. Objector may use the downloadable spreadsheet provided on the Court's website at:  
<http://www.pacourts.us/courts/commonwealth-court/>.

2. Spreadsheet columns shall include, for each challenged signature line: page number, line number, county, and the reason or reasons for each challenge. The spreadsheet shall designate the grounds for objection using the following abbreviations:

**NR = Not Registered**

**NRD= Not Registered in District**

**NRDS = Not Registered on Date Signed**

**NRA = Not Registered at address**

**OC = Out of County**

**Ill = Illegible**

**LIO = Line Information Omitted**

**DUP = Duplicate**

**IHA = Line Information in Hand of Another**

**N/I = Nickname/Initial**

**PRI = Printed Signature**

**DCA = Defective Circulator Affidavit**

**SAC = Signed After Circulator's Affidavit Dated**

**Other = Any ground for objection not listed above**

SEE EXCEL SPREADSHEET FOLLOWING














<b>CANDIDATE'S AFFIDAVIT</b>	<b>PENNSYLVANIA DEPARTMENT OF STATE BUREAU OF ELECTIONS</b> 210 NORTH OFFICE BLDG. HARRISBURG, PA 17120	<b>OFFICE USE ONLY</b> 2022000849 
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Name: Dominguez, Norberto, E., Jr.  
Last Name First Name Middle Name or Initial Suffix

Residential Address: 415 Allen Street  
Street Address

City: Allentown State: PA Zip Code: 18102

Municipality (City, Boro, or Township): Allentown Gender: F  M  NB

Mailing Address (if different from residential): \_\_\_\_\_  
Street Address

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Voting Precinct Name (including Ward & Division, if applicable): Allentown Ward 10 District 1

Office for which you are seeking nomination: REPRESENTATIVE IN THE GENERAL ASSEMBLY

District Number (if applicable): 22nd Legislative District

Email address: contactnorberto@gmail.com

Name as it is to appear on the Ballot: Norberto E. Dominguez Jr.

**CANDIDATE AFFIDAVIT** - I do swear (or affirm) that my residence, my election district and the title of the office for which I desire to be a candidate are as specified above, that I am eligible for said office, that I will not knowingly violate any election law or any law regulating and limiting nomination and election expenses, and prohibiting corrupt practices in connection therewith; that I am aware of the provisions of Section 1626 of the Pennsylvania Election Code requiring pre-election and post-election reporting of campaign contributions and expenditures; that unless I am a candidate for Judge of a Court of Common Pleas, the Philadelphia Municipal Court or the office of school board in a district where that office is elective or the office of magisterial district judge, my name has not been presented as a candidate by nomination petitions of any other party for the same office; that if I am a candidate for any office of a political party I am a registered and enrolled member of such party; that if I am a candidate for Committee Delegate or Alternate Delegate to the National Convention the name of the candidate to whom I am committed is as indicated on my nomination petition and that my signature on the Delegate's Statement was affixed to each page of my nomination petition prior to circulation of same; that I am not a candidate for an office which I already hold, the term of which is not set to expire on the same year as the office subject to this affidavit.

Sworn to and subscribed before me this

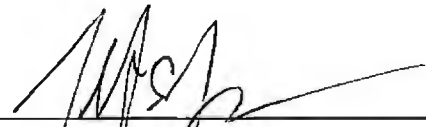
\_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_

\_\_\_\_\_  
Signature of Officer Administering Affirmation

\_\_\_\_\_  
Official Title

My commission expires \_\_\_\_\_

I swear (or affirm) to the above part(s) as required by the law(s) applicable to the office I am seeking.

  
 \_\_\_\_\_  
Signature of Candidate

4845386256  
 \_\_\_\_\_  
Telephone Number

LEHIGH  
 \_\_\_\_\_  
County of Residence





# pennsylvania

## DEPARTMENT OF STATE

Bureau of Elections and Notaries  
717-787-5280

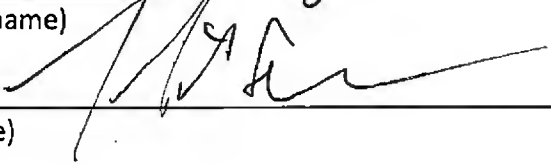
**CANDIDATE DECLARATION to be attached to CANDIDATE'S AFFIDAVIT  
where notarized statement is not available**

CANDIDATE DECLARATION - I declare that my residence, my election district and the title of the office for which I desire to be a candidate are as contained in the attached document, that I am eligible for said office, that I will not knowingly violate any election law or any law regulating and limiting nomination and election expenses, and prohibiting corrupt practices in connection therewith; that I am aware of the provisions of Section 1626 of the Pennsylvania Election Code requiring pre-election and post-election reporting of campaign contributions and expenditures; that unless I am a candidate for Judge of a Court of Common Pleas, the Philadelphia Municipal Court or the office of school board in a district where that office is elective or the office of magisterial district judge, my name has not been presented as a candidate by nomination petitions of any other party for the same office; that if I am a candidate for any office of a political party I am a registered and enrolled member of such party; that if I am a candidate for Committee Delegate or Alternate Delegate to the National Convention the name of the candidate to whom I am committed is as indicated on my nomination petition and that my signature on the Delegate's Statement was affixed to each page of my nomination petition prior to circulation of same; that I am not a candidate for an office which I already hold, the term of which is not set to expire on the same year as the office subject to the accompanying affidavit.

I declare under penalty of perjury under the law of the Commonwealth of Pennsylvania that the foregoing is true and correct.

Signed on the 28 (date) day of MARCH (month), 2022 (year), at  
Dauphin (county or other location, and state), USA (country).

Norberto E. Dominguez Jr  
(printed name)

  
(signature)

