

# OTC

# ELECTION

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

IN RE: THE NOMINATION PETITIONS OF : ELECTION MATTER  
 BOBBY JEFFRIES AS A REPUBLICAN :  
 CANDIDATE FOR STATE REPRESENTATIVE : DOCKET NO:  
 IN THE 106<sup>TH</sup> LEGISLATIVE DISTRICT : 78 MD 2024

### PETITION TO SET ASIDE NOMINATING PETITIONS

AND NOW, come Petitioners, by their counsel, Lawrence M. Otter, Esquire, and file the within 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 David S. Roeting, who resides at 54 Sweet Arrow Dr., Hummelstown, PA 17036, and is a duly registered and enrolled Republican elector of the Commonwealth of Pennsylvania who votes and resides in the 106<sup>th</sup> Legislative District.
3. One Petitioner is Michael J. Davies, who resides at 525 Constitution Dr, Middletown, PA 17507, and is a duly registered and enrolled Republican elector of the Commonwealth of Pennsylvania who votes and resides in the 106th Legislative District.

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DEPARTMENT OF STATE  
EXECUTIVE OFFICE

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 OF PENNSYLVANIA  
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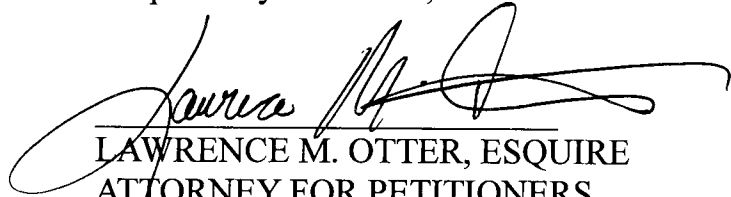
4. One Respondent is Bobby Jeffries, a candidate for State Representative in 106<sup>th</sup> Legislative District who as of February 13, 2024, allegedly resides at .
5. One Respondent is Al Schmidt, the Secretary of the Commonwealth, whose office is located at 305 North Office Building, Harrisburg, Pennsylvania.
6. On or about February 13, 2024, Nominating Petitions and Papers were filed with the Pennsylvania Department of State, Bureau of Elections, nominating Respondent, Bobby Jefferis, as a Republican candidate for State Representative in the 106<sup>th</sup> Legislative District.
7. The nominating Petitions and Papers are purported to consist of various petition pages and allegedly containing 339 lines of signatures of electors supporting the nomination of Jeffries, Respondent.
8. Three Hundred (300) valid signatures of qualified electors who reside within the 119<sup>th</sup> Legislative District are required by statute, **25 P. S. §2872.1 (14)** to support the Nominating Petitions of Bobby Jeffries in the Primary Election scheduled for April 23, 2024.
9. The Nominating Petitions and Papers of Respondent Jeffries 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. Service upon the candidate was effectuated pursuant to the Order of this Court by the posting of this petition on the Commonwealth Court Docket.

**WHEREFORE**, Petitioner prays this Honorable Court to set aside the Nominating Petitions of Respondent Bobby Jeffries since he lacks the minimum number of valid signatures (300) for the office of State Representative and to order that his name not appear on the ballot for nomination as the Republican Party candidate for State Representative in the 106<sup>th</sup> Legislative District.

Respectfully submitted,



LAWRENCE M. OTTER, ESQUIRE  
ATTORNEY FOR PETITIONERS  
PA ATTORNEY ID 31383  
PO Box 575  
Silverdale, PA 18962  
267-261-2948  
Email: [larryotter@hotmail.com](mailto:larryotter@hotmail.com)

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

IN RE: THE NOMINATION PETITIONS OF : ELECTION MATTER  
BOBBY JEFFRIES AS A REPUBLICAN :  
CANDIDATE FOR STATE REPRESENTATIVE : DOCKET NO:  
IN THE 106<sup>TH</sup> LEGISLATIVE DISTRICT : MD 2024

ORDER

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2024, it is hereby

**ORDERED that** the Nominating Petitions of Bobby Jeffries, as a Candidate for State Representative in the 106<sup>th</sup> Legislative District be and hereby are stricken and dismissed, and

**FURTHER ORDERED**

that the name of respondent Bobby Jeffries not appear on the ballot for the April 23, 2024 Primary Election for the Republican Party candidate for State Representative in the 106th Legislative District.

**BY THE COURT**

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

**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

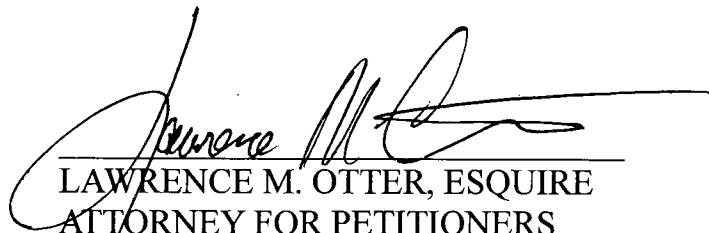
**IN RE: THE NOMINATION PETITIONS OF : ELECTION MATTER  
BOBBY JEFFRIES AS A REPUBLICAN :  
CANDIDATE FOR STATE REPRESENTATIVE : DOCKET NO:  
IN THE 106<sup>TH</sup> LEGISLATIVE DISTRICT : MD 2024**

**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 on February 20, 2024 upon the following:

BY HAND

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



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/>.

Spreadsheet columns shall include, for each challenged signature line on the nomination petition/paper: 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 (challenge codes key):

<b>NR –</b>	<b>Not Registered</b>
<b>NRA –</b>	<b>Not Registered at Address</b>
<b>NRCP –</b>	<b>Not Registered in Candidate's Party</b>
<b>NRD –</b>	<b>Not Registered in District</b>
<b>NRDS –</b>	<b>Not Registered on Date Signed</b>
<b>OC –</b>	<b>Out of County</b>
<b>ILL –</b>	<b>Illegible</b>
<b>LIO –</b>	<b>Line Information Omitted</b>
<b>DUP –</b>	<b>Duplicate</b>
<b>IHA –</b>	<b>Line Information in Hand of Another</b>
<b>N/I –</b>	<b>Nickname/Initial</b>
<b>PRI –</b>	<b>Printed Signature</b>
<b>DCS –</b>	<b>Defective Circulator Statement</b>
<b>SAC –</b>	<b>Signed After Circulator's Statement Dated</b>
<b>Other –</b>	<b>Any ground for objection not listed above</b>

SEE EXCEL SPREADSHEET FOLLOWING





