IN THE COMMONWEALTH COURT OF PENNSYLVANIA

IN RE: THE NOMINATION PETITIONS OF WILLIAM ANDERSON AS A DEMOCRATIC CANDIDATE FOR STATE REPRESENTATIVE IN THE 24th LEGISLATIVE DISTRICT	: ELECTION MATTER : DOCKET NO:
ORDER	
AND NOW, thisday of	, 2022, it is hereby
ORDERED that the Nominating Petitions and Pa	apers of William Anderson as
a Candidate for State Representative in the $24^{ m th}$ L	egislative District be and
hereby are stricken and dismissed, and it is hereb	y FURTHER ORDERED that
the name of respondent William Anderson not app	pear on the ballot for the May
17, 2022 Primary Election for the Democratic Part	ty candidate for State
Representative in the 24th Legislative District.	
BY THE CO	OURT
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IN THE COMMONWEALTH COURT OF PENNSYLVANIA

IN RE: THE NOMINATION PETITIONS OF WILLIAM ANDERSON AS A DEMOCRATIC CANDIDATE FOR STATE REPRESENTATIVE IN THE 24th LEGISLATIVE DISTRICT

ELECTION MATTER

DOCKET NO:

_____i

PETITION TO SET ASIDE NOMINATING PETITIONS OF WILLIAM ANDERSON

AND NOW, come Petitioners, by their counsel, Steve Masters, Esquire, and file the within Objections to the Nomination Petitions of William Anderson 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 Nicole M Sylvester who resides at 4251 Bryn Mawr Road, Pittsburgh, PA 15219 and is a duly registered and enrolled Democratic elector of the Commonwealth of Pennsylvania who votes and resides in the 24th Legislative District.
- 3. Another Petitioner is Loreal RJ Snell who resides at 152 Fairmount Street S, Apt 3, Pittsburgh, PA 15206 and is a duly registered and enrolled Democratic elector of the Commonwealth of Pennsylvania who votes and resides in the 24th Legislative District.

- 4. Another Petitioner is Christopher Paul Sandvig who resides at 847 Jancey Street, Pittsburgh, PA 15206 and is a duly registered and enrolled Democratic elector of the Commonwealth of Pennsylvania who votes and resides in the 24th Legislative District.
- 5. One Respondent is William Anderson, a candidate for State Representative in the 24th Legislative District, who allegedly resides at 7035 Chaucer Street, Pittsburgh PA 15208.
- 6. Another Respondent is Leigh M. Chapman, the acting Secretary of the Commonwealth, whose office is located at 305 North Office Building, Harrisburg, Pennsylvania.
- 7. On or before March 27, 2022, Nominating Petitions and Papers were filed with the Pennsylvania Department of State, Bureau of Elections, nominating Respondent, William Anderson, as a Democratic candidate for State Representative in the 24th Legislative District.
- 8. The nominating Petitions and Papers are purported to consist of 27 petition pages and allegedly containing 493 lines of signatures of electors supporting the nomination of William Anderson, Respondent.
- 9. Three Hundred (300) valid signatures of qualified electors who reside within the 24th Legislative District are required by statute, 25 P. S. §2872.1 (14) to support the Nominating Petitions and Papers of William Anderson, in the Primary Election scheduled for May 17, 2022.

The Nominating Petitions and Papers of Respondent, William 10.

Anderson, 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".

Exhibit A lists 326 challenges to the 493 lines in Anderson's petitions. 11.

12. Pursuant to 25 P.S. §2937, Objectors hereby object to the nominating

petitions of Respondent William Anderson, are prepared to substantiate these

objections via testimony and evidence presented at a prompt hearing as mandated by

25 P.S. §2937, and seek to have the Respondent Anderson's nomination petitions set

aside in accordance with the governing law and Anderson removed from the May 17,

2022 primary ballot as a Democratic Party candidate for the Pennsylvania State

House for the 24th Legislative District, in addition to all other relief in law and equity

which may be deemed just, including costs.

Respectfully submitted,

JustLaws PLLC

By:

Steve Masters, Esquire Attorney ID No. 52060

621 West Mount Airy Avenue

Philadelphia PA 19119

484.483.3344

steve@justlaws.org

Date: April 3, 2022

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CERTIFICATE OF SERVICE

I, Steve Masters, Esquire, hereby certify that I am this day serving copies of the foregoing PETITION TO SET ASIDE NOMINATING PETITIONS OF WILLIAM ANDERSON upon the persons and in the manner indicated below, which service satisfies the requirements of the March 25, 2022 order of the Commonwealth Court, Docket No. 126 Misc. Dkt. No. 3:

Service by both hand delivery and by email on or before April 4, 2022 addressed as follows:

Kathleen Marie Kotula, Esquire Room 306 North Office Building 401 North Street Harrisburg, PA 17120-0500 kkotula@pa.gov

Counsel for Respondent, Secretary of the Commonwealth

Service by email on or before April 4, 2022 addressed as follows:

William Anderson willworks4you@gmail.com

I understand that any false statements herein are made subject to the penalties of 18 Pa. Cons. Stat. Ann. § 4904 (relating to unsworn falsification to authorities).

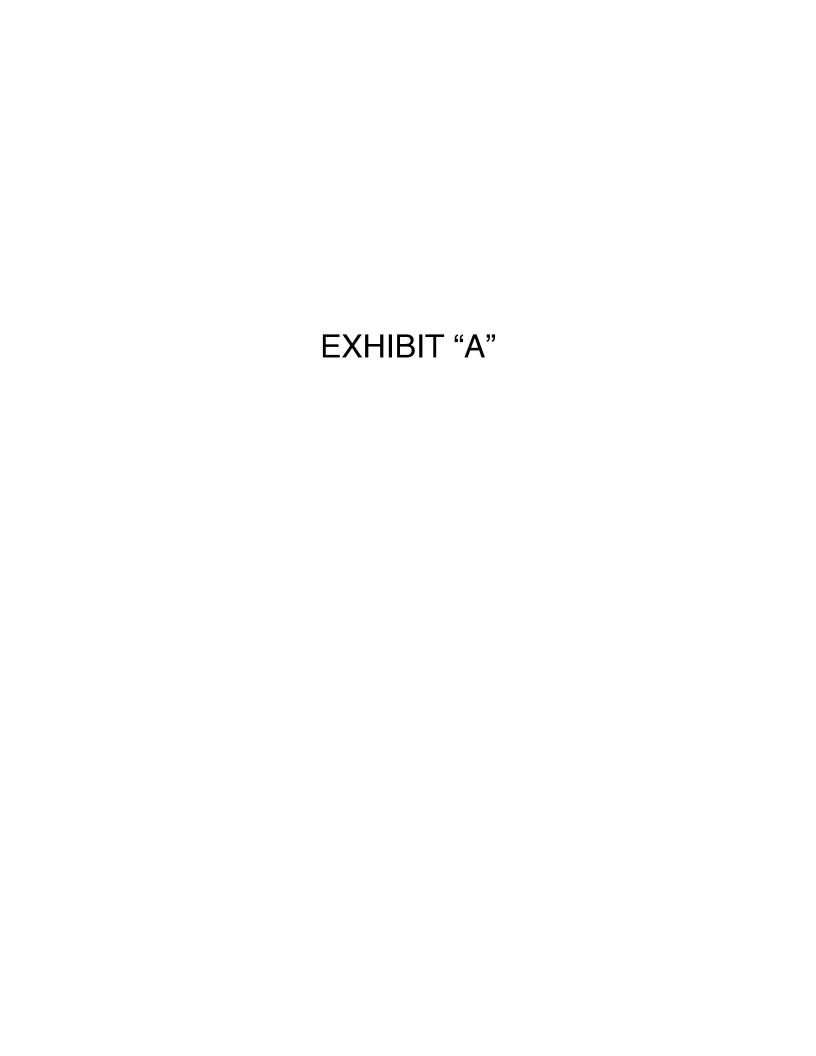
Respectfully submitted,

JustLaws PLLC

By:

Steve Masters, Esquire Attorney ID No. 52060 621 West Mount Airy Avenue Philadelphia PA 19119 484.483.3344 steve@justlaws.org

Date: April 3, 2022



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231	16	25	Allegheny			Χ														
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307	25		1 Allegheny												Χ	Date Tampered				
308	25		2 Allegheny									Χ								
309	25		3 Allegheny									Χ								
310	27		3 Allegheny		Χ															
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315	23		1 Allegheny												Χ	Petition Circulator Not Reg	gistered De	mocrat		
316	23		2 Allegheny												Χ	Petition Circulator Not Reg	gistered De	mocrat		
317	23		3 Allegheny												Χ	Petition Circulator Not Reg	gistered De	mocrat		
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320	23		6 Allegheny												Χ	Petition Circulator Not Reg	gistered De	mocrat		
321	23		7 Allegheny												Χ	Petition Circulator Not Reg	gistered De	mocrat		
322	23		8 Allegheny												Χ	Petition Circulator Not Reg	gistered De	mocrat		
323	23		9 Allegheny												Χ	Petition Circulator Not Reg	gistered De	mocrat		
324	23	1	0 Allegheny												Χ	Petition Circulator Not Reg	gistered De	mocrat		
325	23	1	1 Allegheny												Χ	Petition Circulator Not Reg	gistered De	mocrat		
326	23	1	2 Allegheny												Χ	Petition Circulator Not Reg	gistered De	mocrat		
327	23	1	3 Allegheny												Χ	Petition Circulator Not Reg	gistered De	mocrat		
328	23	1	4 Allegheny												Χ	Petition Circulator Not Reg	gistered De	mocrat		
329	23	1	5 Allegheny												Х	Petition Circulator Not Reg	gistered De	mocrat		
330	23	1	6 Allegheny												Х	Petition Circulator Not Reg	gistered De	mocrat		
331	23	1	7 Allegheny												X	Petition Circulator Not Reg	gistered De	mocrat		
332	26		1 Allegheny											ĺ	X	Statement of Circulator Un				
333	26		2 Allegheny											<u> </u>	X	Statement of Circulator Un	signed			
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ELECTION SPREADSHEET DIRECTIONS

By order of the Commonwealth Court of Pennsylvania, all Petitions to Set Aside Nomination Petitions or Papers (objection petitions) must be filed either in paper format (original and one copy) or by PACFile (the Pennsylvania appellate court electronic filing system). When individual elector signatures are challenged, the objection petition must be accompanied by a spreadsheet as specified in the Court's order and the directions below.

- The objection petition shall specify the objections to individual signature lines in nomination petitions or papers and these shall be set forth in this spreadsheet .
- 2. Spreadsheet columns shall include, for each challenged signature line: page number, line number, county, and the reason or reasons for each objection. The spreadsheet shall designate the grounds for objection using the following abbreviations:

NR = Not Registered

NRA = Not Registered At Address NRD = Not Registered in District

NRDS = Not Registered on Date Signed

OC =**Out of County**

III =Illegible

Line Information Omitted HO =

DUP = Duplicate

IHA= Line Information in Hand of Another

N/I =Nickname/Initial PRI = Printed Signature

Any ground for objection not listed above (specify the Other =

exact nature of the objection in the "Describe Other" cell)

Note: This list of abbreviations for the various grounds to object to a signature is also referred to as the "challenge codes key."

- 3. The objection petition shall clearly state the number of signature lines challenged as well as the total number of completed signature lines on the face of the nomination petitions or papers.
- 4. Any other objections, e.g., to circulator affidavits, candidate affidavits, etc., must be clearly and separately stated in the objection petition.
- 5. If filing the objection petition in paper format:
 - Objector shall attach to the objection petition as an exhibit a printed copy of the spreadsheet printed on 8 ½ x 14 inch paper, with all grid lines showing and column headings appearing on each printed sheet, and a printed copy of the challenge codes key.
 - In addition, Objector shall file two separate digital media devices (CD or USB flash drive), each containing an electronic version of the spreadsheet and the challenge

codes key. The electronic version of the spreadsheets on the each digital media devices must be enabled for editing by the Court, and may <u>not</u> be read-only or password protected.

- 6. If filing the objection petition by PACFile:
 - a. Along with the electronically filed objection petition, Objector shall file as an exhibit an electronic (PDF) version of the spreadsheet with all grid lines showing and column headings appearing on each sheet, and an electronic (PDF) version of the challenge codes key.
 - b. Within two days of submission of filing the objection petition and spreadsheet, Objector shall submit to the Court two paper copies of the electronically filed objection petition and spreadsheet and two separate digital media devices (CD or USB flash drive), each containing an electronic version of the spreadsheet and the challenge codes key. The electronic version of the spreadsheet on the each digital media device must be enabled for editing by the Court, and may not be read-only or password protected.
- 7. Regardless of the method of filing, in addition to the usual service requirements Objector shall serve upon Candidate one digital media device containing a read-only electronic version of the spreadsheet and challenge codes key.

VERIFICATION

The undersigned, CHRISTOPHER PAUL SANDVIG, a duly qualified and registered Democrat in the Commonwealth of Pennsylvania who resides in the 24th Legislative District, is a Petitioner in the foregoing Petition and verifies that the statements made in the foregoing Petition are true and correct to the best of his knowledge, information and belief.

The undersigned understands that statements therein are made subject to the penalties of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities.

Date: 4-3-22

Christopher Paul Sandvig

VERIFICATION

The undersigned, LOREAL RJ SNELL, a duly qualified and registered

Democrat in the Commonwealth of Pennsylvania who resides in the 24th Legislative

District, is a Petitioner in the foregoing Petition and verifies that the statements

made in the foregoing Petition are true and correct to the best of her knowledge,
information and belief.

The undersigned understands that statements therein are made subject to the penalties of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities.

Date: 4/3/22

LOREAL RJ SNELL

VERIFICATION

The undersigned, NICOLE M SYLVESTER, a duly qualified and registered Democrat in the Commonwealth of Pennsylvania who resides in the 24th Legislative District, is a Petitioner in the foregoing Petition and verifies that the statements made in the foregoing Petition are true and correct to the best of her knowledge, information and belief.

The undersigned understands that statements therein are made subject to the penalties of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities.

Date: April 3. 2022

NICOLE M SYLVESTER