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COMMONWEALTH COURT  
OF PENNSYLVANIA  
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# OTC ELECTION

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

IN RE: THE NOMINATION PETITIONS OF : ELECTION MATTER  
RAYNE REITNAUER AS A DEMOCRATIC :  
CANDIDATE FOR STATE REPRESENTATIVE : DOCKET NO:  
IN THE 130<sup>TH</sup> LEGISLATIVE DISTRICT : 80 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 James D. Wade who resides at 926 North reading Ave (Box 14), New Berlinville, PA 19645 and is a duly registered and enrolled Democratic elector of the Commonwealth of Pennsylvania who votes and resides in the 130<sup>th</sup> Legislative District.
3. One Petitioner is Christa Collins, 1574 County Line Rd., Gilbertsville, PA 19525 and is a duly registered and enrolled Democratic elector of the Commonwealth of Pennsylvania who votes and resides in the 130<sup>th</sup> Legislative District.

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4. One Respondent is candidate Rayne Reitnauer for State Representative in 130th Legislative District who as of February 13, 2024, allegedly resides at 8 Jade Lane, Hereford, PA 18056.
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 were filed with the Pennsylvania Department of State, Bureau of Elections, nominating Respondent, Rayne Reitnauer, as a Democratic candidate for State Representative in the 130<sup>th</sup> Legislative District.
7. The Nominating Petitions are purported to consist of 21 petition pages and allegedly containing 335 lines of signatures of electors supporting the nomination of Respondent Reitnauer.
8. Three Hundred (300) valid signatures of qualified electors who reside within the 130<sup>th</sup> Legislative District are required by statute, **25 P. S. §2872.1 (14)** to support the Nominating Petitions of Rayne Reitnauer in the Primary Election scheduled for April 23, 2024.
9. The Nominating Petitions and Papers of Respondent Rayne Reitnauer 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 Rayne Reitnauer 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 Democratic Party candidate for State Representative in the 130<sup>th</sup> Legislative District.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'L. M. Otter', written over a horizontal line.

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  
RAYNE REITNAUER AS A DEMOCRATIC       :  
CANDIDATE FOR STATE REPRESENTATIVE : DOCKET NO:  
IN THE 130<sup>TH</sup> LEGISLATIVE DISTRICT       :                   MD 2024**

**ORDER**

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

**ORDERED** that the Nominating Petitions of Rayne Reitnauer, as a Candidate for State Representative in the 130th Legislative District be and hereby are stricken and dismissed, and

**FURTHER ORDERED**

that the name of respondent Rayne Reitnauer, not appear on the ballot for the April 23, 2024 Primary Election for the Democratic Party candidate for State Representative in the 130th Legislative District.

**BY THE COURT**

J.

IN THE COMMONWEALTH COURT OF PENNSYLVANIA


IN RE: THE NOMINATION PETITIONS OF : ELECTION MATTER  
RAYNE REITNAUER AS A DEMOCRATIC :  
CANDIDATE FOR STATE REPRESENTATIVE : DOCKET NO:  
IN THE 130<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





