

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

IN RE: THE NOMINATION PETITIONS OF WILLIAM ANDERSON AS A DEMOCRATIC CANDIDATE FOR STATE REPRESENTATIVE IN THE 24 th LEGISLATIVE DISTRICT	: : : : : : :	ELECTION MATTER DOCKET NO: _____
--	---------------------------------	--

ORDER

AND NOW, this _____ day of _____, 2022, it is hereby
ORDERED that the Nominating Petitions and Papers of William Anderson as
a Candidate for State Representative in the 24th Legislative District be and
hereby are stricken and dismissed, and it is hereby **FURTHER ORDERED** that
the name of respondent William Anderson not appear on the ballot for the May
17, 2022 Primary Election for the Democratic Party candidate for State
Representative in the 24th Legislative District.

BY THE COURT

J.

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

IN RE: THE NOMINATION PETITIONS OF	:	ELECTION MATTER
WILLIAM ANDERSON AS A DEMOCRATIC	:	
CANDIDATE FOR STATE REPRESENTATIVE	:	DOCKET NO:
IN THE 24 th LEGISLATIVE DISTRICT	:	

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.

10. The Nominating Petitions and Papers of Respondent, William 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".

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

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

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

EXHIBIT "A"

7	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T
8	Page	Line	County	NR	NRA	NRD	NRDS	OC	ILL	LIO	DUP	IHA	N/I	PRI	Other	Describe Other	S/S	V/S	S/CT	V/CT
231	16	25	Allegheny			X														
232	16	26	Allegheny			X														
233	16	27	Allegheny			X														
234	16	28	Allegheny			X														
235	16	29	Allegheny			X														
236	16	30	Allegheny			X														
237	17	1	Allegheny			X														
238	17	2	Allegheny			X														
239	17	3	Allegheny			X														
240	17	7	Allegheny			X														
241	18	1	Allegheny			X														
242	18	2	Allegheny			X														
243	19	1	Allegheny			X														
244	20	1	Allegheny			X														
245	20	2	Allegheny			X														
246	20	3	Allegheny			X			X											
247	20	4	Allegheny						X											
248	20	5	Allegheny			X														
249	20	6	Allegheny			X														
250	21	1	Allegheny			X						X								
251	21	2	Allegheny			X						X								
252	21	3	Allegheny			X			X											
253	21	4	Allegheny			X			X											
254	21	5	Allegheny			X														
255	21	6	Allegheny						X											
256	21	7	Allegheny			X														
257	21	8	Allegheny			X														
258	21	9	Allegheny			X			X											
259	21	10	Allegheny			X														
260	21	11	Allegheny			X			X											
261	21	12	Allegheny			X			X											
262	21	13	Allegheny			X			X						X	Unregistered Address				
263	21	14	Allegheny			X														
264	21	15	Allegheny			X			X											
265	21	16	Allegheny			X			X			X								
266	21	17	Allegheny						X											
267	21	18	Allegheny						X											
268	21	19	Allegheny												X	Unregistered Address				

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T
7	Specific Grounds for Objection																			
8	Page	Line	County	NR	NRA	NRD	NRDS	OC	ILL	LIO	DUP	IHA	N/I	PRI	Other	Describe Other	S/S	V/S	S/CT	V/CT
307	25	1	Allegheny												X	Date Tampered				
308	25	2	Allegheny									X								
309	25	3	Allegheny									X								
310	27	3	Allegheny		X															
311	27	4	Allegheny		X	X						X								
312	27	5	Allegheny		X	X						X								
313	27	6	Allegheny									X								
314	27	7	Allegheny									X								
315	23	1	Allegheny												X	Petition Circulator Not Registered Democrat				
316	23	2	Allegheny												X	Petition Circulator Not Registered Democrat				
317	23	3	Allegheny												X	Petition Circulator Not Registered Democrat				
318	23	4	Allegheny												X	Petition Circulator Not Registered Democrat				
319	23	5	Allegheny												X	Petition Circulator Not Registered Democrat				
320	23	6	Allegheny												X	Petition Circulator Not Registered Democrat				
321	23	7	Allegheny												X	Petition Circulator Not Registered Democrat				
322	23	8	Allegheny												X	Petition Circulator Not Registered Democrat				
323	23	9	Allegheny												X	Petition Circulator Not Registered Democrat				
324	23	10	Allegheny												X	Petition Circulator Not Registered Democrat				
325	23	11	Allegheny												X	Petition Circulator Not Registered Democrat				
326	23	12	Allegheny												X	Petition Circulator Not Registered Democrat				
327	23	13	Allegheny												X	Petition Circulator Not Registered Democrat				
328	23	14	Allegheny												X	Petition Circulator Not Registered Democrat				
329	23	15	Allegheny												X	Petition Circulator Not Registered Democrat				
330	23	16	Allegheny												X	Petition Circulator Not Registered Democrat				
331	23	17	Allegheny												X	Petition Circulator Not Registered Democrat				
332	26	1	Allegheny												X	Statement of Circulator Unsigned				
333	26	2	Allegheny												X	Statement of Circulator Unsigned				
334	26	4	Allegheny												X	Statement of Circulator Unsigned				

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.

1. 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
LIO =	Line Information Omitted
DUP =	Duplicate
IHA =	Line Information in Hand of Another
N/I =	Nickname/Initial
PRI =	Printed Signature
Other =	Any ground for objection not listed above (specify the 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:
 - a. 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.
 - b. 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 **not** 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
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