

# OTC

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# ELECTION

## IN THE COMMONWEALTH COURT OF PENNSYLVANIA

**IN RE: Nomination Petition of** : Commonwealth Court  
**Rick Krajewski for the office of** : Election Matter  
**State Representative for the 188th** : February 2024 Term  
**Legislative District** : No. 73 MD 2024

RECEIVED COURT  
 COMMONWEALTH PENNSYLVANIA  
 2024 FEB 20 AM 11:20

**PETITION TO SET ASIDE NOMINATION PETITION OF RICK KRAJEWSKI FOR THE OFFICE OF REPRESENTATIVE IN THE GENERAL ASSEMBLY**

**NOW COMES a Farmer with a Pitchfork & Native Son of Southwest and West Philadelphia, BORN and RAISED, who respectively avers the following:**

1. Tony Dphax King is a duly qualified elector, who was born and raised in **Southwest and West Philadelphia**, owns a home in Southwest Philadelphia and has always been a registered voter of the Democratic Party in Ward 27, Division 12.

2. The Respondent, a **CARPETBAGGER** who was born and raised in the borough of **South Bronx, New York City**, is the above referenced Candidate for Representative in the General Assembly.

RECEIVED

FEB 20 2024

DEPARTMENT OF STATE  
EXECUTIVE OFFICE

11:00 am

3. On or before Tuesday, February 13, 2024, the above referenced Candidate filed a Candidate's Affidavit and Candidate Declaration together with a 54-page Nomination Petition (page 52 missing) for the Office of Representative in the General Assembly for the 188th Legislative District. A copy of the Candidate's Affidavit and Candidate's Declaration is attached hereto as Exhibit "A" and Exhibit "B."

4. For the reasons set forth below, this Humble Petitioner Prays that The Honorable Court Set Aside the Nominating Petition of the above-named Candidate for the Office of State Representative to represent Southwest and West Philadelphia.

5. Pursuant to the Pennsylvania Election Code, each Candidate must file with his nomination petition an affidavit stating "(b) his election district, giving city, borough, town or township" (see **25 Pa. Statute §2870**).

6. The Respondent filed his Candidate's Affidavit stating that his "City, Boro or Township" is PHILADELPHIA.

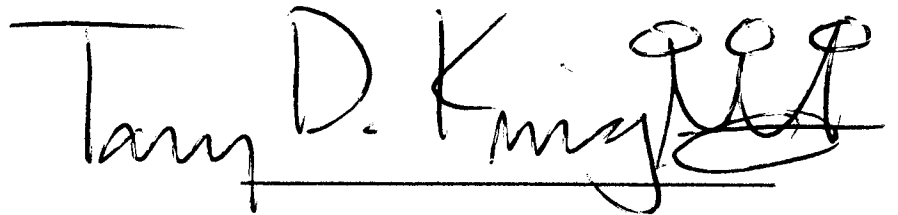
7. The 188th has a poverty rate of almost 30%. Instead of paying \$10.00 to help a local NOTARY business in our poverty stricken district, the two-term incumbent from South Bronx, New York City, opted to file the FREE Candidate's Declaration.

In addition, the Respondent's Declaration states that his election district, city, borough or township is DAUPHIN COUNTY, PA which is two hours from the City of Philadelphia, PA.

8. As a result, this Petitioner and life-long resident of the 188th Legislative District Prays that The Honorable Court finds that the Candidate's Affidavit and Candidate's Declaration are CONTRARY and therefore fails to conform to the requirements of the Pa. Election Code, 25 Pa. Stat. §2870 and must be Set Aside and the Candidate's name NOT be placed on the ballot for the Tuesday, April 23, 2024 Primary Election.

**WHEREFORE**, Petitioner Prays that this Honorable Court will ponder the inconsistency of the Candidate's Affidavit and Candidate Declaration and Set Aside the Nomination Petition of the above-named Respondent or any other Relief that this Honorable Court deems appropriate.

*Obedient & Humble Public Servant,*

A handwritten signature in black ink that reads "Tony D. King" followed by a stylized flourish.

**TONY DPHAX KING**

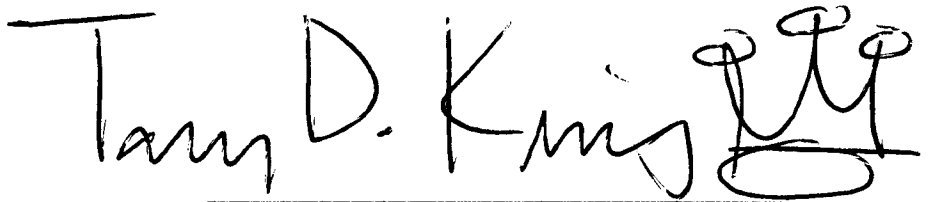
Date 2/20/24

**VERIFICATION**

I, **TONY DPHAX KING**, hereby verify that the facts contained in the Petition To Set Aside are true and correct to the best of my knowledge, information and belief.

I understand that the statements made herein are made subject to the provisions of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.

*Obedient & Humble Public Servant,*

A handwritten signature in black ink that reads "Tony D. King". The signature is written in a cursive style with a horizontal line underneath the name.

**TONY DPHAX KING**

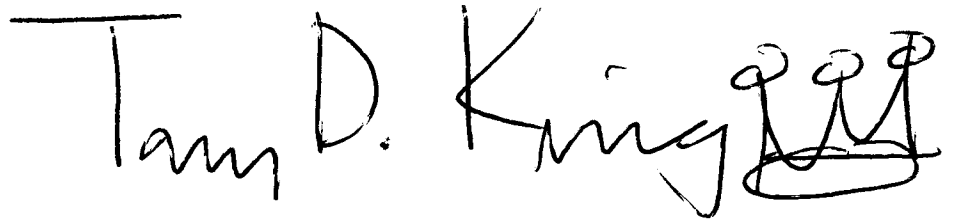
Date 2/20/24

**AFFIDAVIT OF SERVICE**

Per the July 19, 2023 **ORDER** of the Commonwealth Court of PA:

THE POSTING OF AN OBJECTION PETITION ON THE WEBPAGE SHALL CONSTITUTE SERVICE ON THE CANDIDATE WHOSE NOMINATION PETITIONS/PAPERS HAVE BEEN CHALLENGED. ALL CANDIDATES ARE UNDER A CONTINUING OBLIGATION TO CHECK THE WEBPAGE TO DETERMINE IF AN OBJECTION PETITION HAS BEEN FILED TO THEIR NOMINATION PETITION/PAPERS.


*Obedient & Humble Public Servant,*

Handwritten signature of Tony D. King in black ink, written over a horizontal line.

**TONY DPHAX KING**

Date 2/20/24

# EXHIBIT A

<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>
		2024000541 

Name: Krajewski, Rick, C  
Last Name First Name Middle Name or Initial Suffix

Residential Address: 241 S 49th St Unit 319  
Street Address

City: Philadelphia State: PA Zip Code: 19139

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

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

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

Voting Precinct Name (including Ward & Division, if applicable): Ward 46 Division 22

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

District Number (if applicable): 188th Legislative District

Email address: rick@rickforphilly.com

Name as it is to appear on the Ballot: Rick Krajewski

**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.

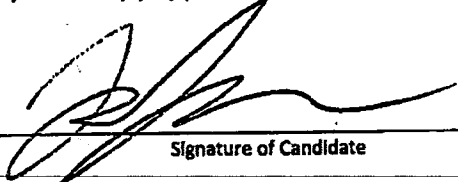
Sworn to and subscribed before me this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_

\_\_\_\_\_  
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

2156170224  
Telephone Number

PHILADELPHIA  
County of Residence

EXHIBIT B



**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 5th (date) day of Feb (month), 2024 (year), at

Dauphin (county or other location, and state), USA (country).  
County, PA

Rick Krajewski:  
(printed name)

(signature)