IN THE COMMONWEALTH COURT OF PENNSYLVANIA

IN RE: THE NOMINATION PETITIONS OF : ELECTION MATTER
TOM WEBB AS A REPUBLICAN   :
CANDIDATE FOR STATE REPRESENTATIVE : DOCKET NO:
IN THE 108TH LEGISLATIVE DISTRICT   :   7 7 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 William Krohn who resides at 2014 Housels Run Rd., Milton, PA 17842 and is a duly registered and enrolled Republican elector of the Commonwealth of Pennsylvania who votes and resides in the 108th Legislative District.

3. One Petitioner is Robert Boyer, who resides at 340 Vine St., Sunbury, PA 17801 and is a duly registered and enrolled Republican elector of the Commonwealth of Pennsylvania who votes and resides in the 108th Legislative District.
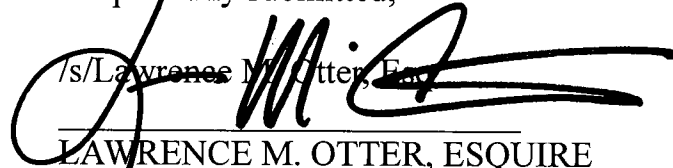
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4. One Respondent is Tom Webb, a candidate for State Representative in 108th Legislative District who as of February 13, 2024, allegedly resides at 105 Carroll Rd., Sunbury, PA 17801

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, Tom Webb, as a Republican candidate for State Representative in the 108th Legislative District.

7. The nominating Petitions are purported to consist of 31 petition pages and allegedly containing 360 lines of signatures of electors supporting the nomination of Respondent Tom Webb.

8. Three Hundred (300) valid signatures of qualified electors who reside within the 108th Legislative District are required by statute, **25 P. S. §2872.1 (14)** to support the Nominating Petitions of Tom Webb in the Primary Election scheduled for April 23, 2024.

9. The Nominating Petitions of Respondent Tom Webb are invalid and inadequate in that they contain less than 300 valid signatures and because

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of various inadequacies and deficiencies as outlined in a spreadsheet

attached hereto and incorporated as **Exhibit A.**

10.   In addition, there are various circulators deficiencies found in the

circulator's affidavits on pages 1, 3, 4, 5, 6, 7,13, 14,15, 16 and 17. The

circulator is not registered Republican at the Address listed in her

affidavit, the county does not match the county of the electors,

11. Service upon the candidate was effectuated pursuant to the Order of this

Court by the positing 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 106th Legislative District.

Respectfully submitted,

/s/Lawrence M. Otter, Esq.

LAWRENCE M. OTTER, ESQUIRE
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IN THE COMMONWEALTH COURT OF PENNSYLVANIA

IN RE: THE NOMINATION PETITIONS OF   : ELECTION MATTER
TOM WEBB AS A REPUBLICAN   :
CANDIDATE FOR STATE REPRESENTATIVE : DOCKET NO:
IN THE 108TH LEGISLATIVE DISTRICT   :   MD 2024

ORDER

AND NOW, this _____ day of _____, 2024, it is hereby

ORDERED that the Nominating Petitions of Tom Webb, as a Candidate for State

Representative in the 108th Legislative District be and hereby are stricken and

dismissed, and

FURTHER ORDERED

that the name of respondent Tom Webb, not appear on the ballot for the April 23,

2024 Primary Election for the Republican Party candidate for State Representative

in the 108th Legislative District.

BY THE COURT

_____
J.

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IN THE COMMONWEALTH COURT OF PENNSYLVANIA

IN RE: THE NOMINATION PETITIONS OF   : ELECTION MATTER
TOM WEBB AS A REPUBLICAN   :
CANDIDATE FOR STATE REPRESENTATIVE : DOCKET NO:
IN THE 108TH 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

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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):

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

SEE EXCEL SPREADSHEET FOLLOWING

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Directions for completing spreadsheet:

1. For each signature line that is challenged as invalid complete the information indicated for columns A through C.
2. Indicate the ground or grounds that allegedly render the signature line invalid by inserting an "X" in the appropriate column (columns D through R).
3. When "Other" (column R) is used, specify the exact nature of the objection in the "Describe Other" cell (column S).
4. Do not make any marks in columns T through W.
5. See the Election Spreadsheet Directions tab below for detailed directions and a legend of the objection codes.

Specific Grounds for Objection

#	Page	Line	County	NR	NRA	NRCP	NRD	NRDS	OC	ILL	LIO	DUP	IHA	N/I	PRI	DCS	SAC	Other	Describe Other	S/S	V/S	S/CT	V/CT
9	1	1	Montour								x					x							
10	1	2	Montour													x							
11	1	3	Montour													x							
12	1	4	Montour													x							
13	1	5	Montour					x								x							
14	1	6	Montour					x								x							
15	1	7	Montour					x								x							
16	1	8	Montour		x			x							1	x							
17	1	9	Montour					x							1	x		x	Cross Out				
18	1	10	Montour					x							1	x							
19	1	11	Montour					x							1	x							
20	1	12	Montour					x							1	x							
21	1	13	Montour					x							1	x							
22	1	14	Montour					x							1	x							
23	2	10	Montour			x									1	x							
24	3	1	Montour				x								1	x							
25	3	2	Montour													x							
26	3	3	Montour													x							
27	3	4	Montour													x							
28	3	5	Montour													x							
29	3	6	Montour													x							
30	3	7	Montour													x							
31	3	8	Montour													x							
32	3	9	Montour													x							
33	3	10	Montour													x							
34	3	11	Montour											x		x							
35	3	12	Montour							x						x							
36	3	13	Montour													x							
37	3	14	Montour													x							
38	3	15	Montour													x							
39	3	16	Montour													x							
40	3	17	Montour													x							
41	3	18	Montour													x							
42	3	19	Montour													x							
43	3	20	Montour						x							x							
44	3	21	Montour					x				x				x							
45	3	22	Montour					x				x				x							
46	3	23	Montour													x							
47	3	24	Montour													x							
48	3	25	Montour													x							
49	4	1	Montour													x							
50	5	1	Montour													x	x	x	No such city				
51	6	1	Montour													x							
52	6	2	Montour													x							
53	6	3	Montour													x							
54	6	4	Montour													x							
55	7	1	Montour													x							
56	7	2	Montour													x							

	Page	Line	County	Specific Grounds for Objection																			
				NR	NRA	NRCP	NRD	NRDS	OC	ILL	LIO	DUP	IHA	N/I	PRI	DCS	SAC	Other	Describe Other	S/S	V/S	S/CT	V/CT
57	7	3	Montour																				
58	7	4	Montour																				
59	8	1	Northumberland													x			Circulator Address				
60	8	2	Northumberland													x			Circulator Address				
61	8	3	Northumberland			x										x			Circulator Address				
62	9	2	Northumberland		x											x			page 16 line 15				
63	9	3	Northumberland		x							x				x			13 Line 2				
64	9	5	Northumberland		x							x											
65	9	7	Northumberland		x																		
66	9	9	Northumberland		x																		
67	9	14	Northumberland		x																		
68	9	15	Northumberland		x																		
69	9	16	Northumberland		x																		
70	9	17	Northumberland		x																		
71	9	18	Northumberland		x																		
72	9	19	Northumberland		x																		
73	9	20	Northumberland		x																		
74	9	21	Northumberland		x																		
75	9	22	Northumberland		x		x																
76	9	23	Northumberland		x	x	x																
77	9	24	Northumberland		x	x	x																
78	9	25	Northumberland		x																		
79	10	7	Northumberland		x																		
80	11	1	Northumberland		x									x									
81	11	2	Northumberland		x																		
82	11	4	Northumberland		x	x																	
83	11	5	Northumberland		x	x																	
84	11	6	Northumberland		x	x	x																
85	11	8	Northumberland		x		x							x									
86	11	9	Northumberland				x			x	x												
87	11	10	Northumberland															x	Voter Cross Out				
88	11	11	Northumberland			x												x	Voter Cross Out				
89	11	12	Northumberland						x														
90	11	14	Northumberland						x														
91	11	20	Northumberland																				
92	12	4	Northumberland										x										
93	12	5	Northumberland										x										
94	12	11	Northumberland								x					x							
95	12	12	Northumberland							x			x			x							
96	12	12	Northumberland										x			x							
97	12	17	Northumberland									x				x							
98	13	1	Northumberland											x		x							
99	13	2	Northumberland													x			Page 9 Line 3				
100	13	3	Northumberland													x							
101	13	4	Northumberland													x							
102	13	5	Northumberland													x							
103	14	1	Northumberland													x							
104	14	2	Northumberland													x							
105	14	3	Northumberland													x							
106	14	4	Northumberland													x							
107	14	5	Northumberland													x							
108	14	6	Northumberland													x							
109	14	7	Northumberland													x							
110	14	8	Northumberland													x							

	Page	Line	County	NR	NRA	NRCP	NRD	NRDS	OC	ILL	LIO	DUP	IHA	N/I	PRI	DCS	SAC	Other	Describe Other	S/S	V/S	S/CT	V/CT
												Specific Grounds for Objection											
111	14	9	Northumberland													x							
112	14	10	Northumberland													x							
113	14	11	Northumberland													x							
114	14	12	Northumberland		x	x										x							
115	14	13	Northumberland		x	x										x							
116	14	14	Northumberland													x							
117	14	15	Northumberland													x							
118	14	16	Northumberland										x			x							
119	14	17	Northumberland										x	x		x							
120	15	1	Northumberland										x	x		x							
121	15	2	Northumberland													x							
122	15	3	Northumberland													x							
123	15	4	Northumberland													x							
124	15	5	Northumberland		x											x							
125	15	6	Northumberland										x			x							
126	16	1	Northumberland	x									x			x							
127	16	2	Northumberland	x									x			x							
128	16	3	Northumberland	x												x							
129	16	4	Northumberland		x											x							
130	16	5	Northumberland		x											x							
131	16	6	Northumberland			x										x							
132	16	7	Northumberland			x										x							
133	16	8	Northumberland			x										x		x	Date Problem				
134	16	9	Northumberland			x										x		x	Date Problem				
135	16	10	Northumberland	x												x							
136	16	11	Northumberland													x							
137	16	12	Northumberland													x							
138	16	13	Northumberland													x							
139	16	14	Northumberland													x							
140	16	15	Northumberland									x				x							
141	16	16	Northumberland	x												x		x	page 9 Line 2				
142	16	17	Northumberland													x							
143	16	18	Northumberland												x	x		x	signature match				
144	16	19	Northumberland		x								x	x		x							
145	16	20	Northumberland		x								x			x							
146	16	21	Northumberland										x			x							
147	16	22	Northumberland	x									x			x							
148	16	23	Northumberland													x							
149	16	24	Northumberland			x										x							
150	17	1	Northumberland													x							
151	17	2	Northumberland													x							
152	17	3	Northumberland													x							
153	17	4	Northumberland													x							
154	17	5	Northumberland													x							
155	17	6	Northumberland													x							
156	17	7	Northumberland													x		x	Voter Cross Out				
157	17	8	Northumberland													x							
158	17	9	Northumberland													x							
159	17	10	Northumberland													x							
160	17	11	Northumberland													x							
161	17	12	Northumberland													x							
162	17	13	Northumberland													x							
163	17	14	Northumberland													x							
164	17	15	Northumberland											x		x							

	Page	Line	County	NR	NRA	NRCP	NRD	NRDS	OC	ILL	LIO	DUP	IHA	N/I	PRI	DCS	SAC	Other	Describe Other	S/S	V/S	S/CT	V/CT
165	17	16	Northumberland																				
166	17	17	Northumberland			x																	
167	17	18	Northumberland																				
168	17	19	Northumberland																				
169	18	3	Northumberland		x																		
170	18	5	Northumberland	x	x	x																	
171	18	6	Northumberland		x	x																	
172	18	8	Northumberland		x																		
173	18	10	Northumberland												x								
174	18	13	Northumberland		x									x									
175	20	1	Northumberland								x												
176	20	2	Northumberland											x									
177	20	5	Northumberland								x					x		x	Voter Cross out				
178	20	6	Northumberland								x					x		x	Voter Cross out				
179	20	9	Northumberland	x	x											x							
180	21	8	Northumberland		x	x																	
181	21	9	Northumberland		x	x																	
182	21	10	Northumberland		x	x																	
183	22	2	Northumberland		x	x																	
184	22	3	Northumberland		x	x																	
185	22	4	Northumberland		x	x																	
186	22	5	Northumberland		x									x									
187	22	7	Northumberland		x													x	No Last Name				
188	22	14	Northumberland		x	x																	
189	22	16	Northumberland		x	x																	
190	22	21	Northumberland		x	x																	
191	22	24	Northumberland		x									x				x	Name incorrect				
192	23	1	Northumberland		x	x																	
193	23	2	Northumberland		x	x																	
194	23	3	Northumberland		x	x																	
195	23	6	Northumberland x																				
196	23	7	Northumberland		x	x																	
197	23	9	Northumberland		x																		
198	27	8	Northumberland			x												x	Name Incorrect				
199	27	9	Northumberland		x	x						x											
200	27	11	Northumberland		x							x											
201	28	2	Northumberland		x	x																	
202	28	3	Northumberland		x	x																	
203	28	6	Northumberland		x	x																	
204	28	7	Northumberland		x	x																	
205	28	8	Northumberland											x									
206	28	10	Northumberland				x																
207	29	1	Northumberland		x																		
208	29	2	Northumberland															x	Voter Crossout				
209	29	4	Northumberland		x																		
210	29	8	Northumberland		x													x	Spelled name wrong				
211	29	9	Northumberland		x	x																	
212	29	10	Northumberland		x									x									
213	29	11	Northumberland		x	x																	
214	29	15	Northumberland		x																		
215	29	16	Northumberland		x																		
216	29	18	Northumberland	x	x																		
217	29	23	Northumberland	x																			
218	29	24	Northumberland											x									

	Page	Line	County	NR	NRA	NRCP	NRD	NRDS	OC	ILL	LIO	*Specific Grounds for Objection*											
												DUP	IHA	N/I	PRI	DCS	SAC	Other	Describe Other	S/S	V/S	S/CT	V/CT
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X
219	29	28	Northumberland																					
220	30	3	Northumberland																					
221	31	2	Northumberland																					
222	31	3	Northumberland			x	x																	
223	31	3	Northumberland																					
224		4	Northumberland																					
225																							
226																							
227																							
228																							
229																							
230															x								
231																							
232																							
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