# IN THE COMMONWEALTH COURT OF PENNSYLVANIA

IN RE:

**ELECTION MATTER** 

DOCKET

THE NOMINATION PETITIONS OF

DUSTIN MORRIS AS A CANDIDATE

FOR DEMOCRATIC STATE COMMITTEE

TOP PERHESYLVANIA

127 APR -4 PH 4: 29

# PETITION TO SET ASIDE NOMINATING PETITIONS FOR THE POSITION OF DEMOCRATIC STATE COMMITTEE MEMBER

**AND NOW,** COMES PETITIONER JACQUE WHAUMBUSH, A DULY QUALIFIED ELECTOR OF PHILADELPHIA COUNTY SEEKING TO SET ASIDE THE NOMINATING PETITIONS OF DUSTIN MORRIS.

- 1. EXCLUSIVE JURISDICTION OVER THE SUBJECT MATTER OF THIS PETITION IS VESTED IN THE COMMONWEALTH COURT OF PENNSYLVANIA BY THE PROVISIONS OF THE PENNSYLVANIA ELECETION CODE, 25P.S. 2937 AND THE PROVISIONS OF THE JUDICIAL CODE, 42 PA C.C.A. 764
- 2. PETITIONER JACQUE WHAUMBUSH RESIDES AT 967 CLYDE LANE PHILADELPHIA PA. 19128 IS DULY REGISTERED AND IS AN ENROLLED DEMOCRATIC ELECTOR OF THE COMMONEALTH OF PENNSYLVANIA.
- 3. RESPONDENT DUSTIN MORRIS, RESIDES AT 7703 KEIFFER STREET PHILADELPHIA PA IS A DULY REGISTERED AND ENROLLED DEMOCRATIC ELECTOR OF THE COMMONWEALTH OF PENNSYLVANIA.
- 4. ON OR ABOUT MARCH 28, 2022 NOMINATING PETITIONS WERE FILED WITH THE PENNSYLVANIA DEPARTMENT OF STATE, NOMINATING RESPONDENT DUSTIN MORRIS AS A CANDIDATE OF PHILADEPHIA AS A CANDIDATE FOR THE DEMOCRATIC STATE COMMITTEE.
- 5. THE NOMINATING PETITIONS CONSIST OF 6 PAGES AND CONTAINED 117 SIGNATURES
- 6. THE NOMINATING PETITIONS ARE INVALID AND DEFECTIVE IN THAT THEY CONTAIN LESS THAN THE 100 VALID SIGNATURES REQUIRED FOR THIS NAME TO APPEAR ON THE BALLOT FOR THE POSITION STATE OF COMMITTEE.
- 7. THE NOMINATING PETITIONS CONTAIN A MULTITUDE OF DEFICIENCIES.
- 8. EXHIBIT A. ATTACHED HERETO, OUTLINES THE 25 CHALLENGES TO THE NOMINATING PETITIONS OF KYLE HANAHAN.

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**WHEREFORE,** PETITIONER JACQUE WHAUMBUSH RESPECTFULLY REQUEST THIS HONORABLE COURT TO SET ASIDE THE NOMINATING PETITIONS OF KYLE HANAHAN FOR FAILURE TO SUBMIT THE LEGAL REQUIRED NUMBER OF VALID QUALIFIED SIGNATURES OF ELECTORS.

RESPECTFULLY SUBMITTED

JA¢QUE WHAUMBUSH

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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/.

2. Spreadsheet columns shall include, for each challenged signature line: 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:

NR = Not Registered

NRD= Not Registered in District

NRDS = Not Registered on Date Signed

NRA = Not Registered at address

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

DCA = Defective Circulator Affidavit

**SAC = Signed After Circulator's Affidavit Dated** 

Other = Any ground for objection not listed above

SEE EXCEL SPREADSHEET FOLLOWING

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ATTENTIONI

A. This Petition may be used to submit for Nomination the Name of One Candidate for One Office Only.

B. Complete all Blank Spaces Prior to Circulation.

C. Provide a District only if the Candidate must run in a Senatorial District or a District defined by Party Rules.

D. Please refer to the instruction page provided with this petition for detailed information about completion of this form.

NAME OF OFFICE: MEMBER OF DEMOCRATIC STATE COMMITTEE

DISTRICT NUMBER: Philadelphia County 7th Senatorial District (District 507)

(Complete only if the Candidate must run in a Senatorial District or a District defined by Party Rules.)

YEAR OF PRIMARY: 2022

CANDIDATE'S NAME(PRINT OR TYPE NAME): Dustin Morris

OCCUPATION: Executive Director PA Banking and Insurance Commitee

RESIDENTIAL STREET ADDRESS: 7703 Keiffer Street

CITY, BOROUGH OR TWP.: Philadelphia

COUNTY OF SIGNERS: PHILADELPHIA 51

PARTY OF SIGNERS: Democratic

To the SECRETARY OF THE COMMONWEALTH:

We, the undersigned, all of whom severally declare that we are qualified electors of the County and of the political district set forth above, that we are registered and enrolled members of the Political Party set forth above, and have signed no petition inconsistent herewith, do hereby petition the Secretary of the Commonwealth to have the candidate whose Name, Occupation and Residence are as set forth above, certified to the County Board of Elections of said County or Counties in said District, to be printed on the Primary Ballot of said Party, for the Year and Office set forth above.

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11.	Judy Sharyna	Judy short ma	3507	BUNYSIO	e Phila	3/56/22
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13.	Jum May	ARMON, MIKLOSEY	4772	MANAMA	AL Phile	3/24/32
14.	Ruchel Beak	Rachel Beale	4777	Managantes	ve Philadelphia	03/26/21
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C. Provide a District only if the Candidate must run in a Senatorial District or a District defined by Party Rules.

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(Complete only If the Candidate must run in a Senatorial District or a District defined by Party Rules.)

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CANDIDATE'S NAME(PRINT OR TYPE NAME): Dustin Morris

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RESIDENTIAL STREET ADDRESS: 7703 Keiffer Street

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PARTY OF SIGNERS: Democratic

OFFICIAL USE ONLY

To the SECRETARY OF THE COMMONWEALTH:

We, the undersigned, all of whom severally declare that we are qualified electors of the County and of the political district set forth above, that we are registered and enrolled members of the Political Party set forth above, and have signed no petition inconsistent herewith, do hereby petition the Secretary of the Commonwealth to have the candidate whose Name, Occupation and Residence are as set forth above, certified to the County Board of Elections of said County or Counties in said District, to be printed on the Primary Ballot of said Party, for the Year and Office or to the house of said Party, for the Year and Office set forth above.

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10.	Dilling	David Murray	3640	Stantonst	Phila	3/26/22
11.	typ How	Kyle Harehan	4718	follost	Phila	3/4/22
12.	/Mu	Mury Di Sayan	3812	Terroust	Plula	3/26/20
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14.	Staron Me menomin	Sharon My Meramis	7701	Keilfest	Phila	3/26/22
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1 County of Petition-Signers' Residence	DA S. NORRIS				
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A. This Petition may be used to submit for Nomination the Name of One Candidate for One Office Only.

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OCCUPATION: Executive Director PA Banking and Insurance Commitee

RESIDENTIAL STREET ADDRESS: 7703 Keiffer Street

CITY, BOROUGH OR TWP.: Philadelphia

COUNTY OF SIGNERS: PHILADELPHIA 51

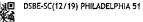
PARTY OF SIGNERS: Democratic

OFFICIAL USE ONLY

To the SECRETARY OF THE COMMONWEALTH:

We, the undersigned, all of whom severally declare that we are qualified electors of the County and of the political district set forth above, that we are registered and enrolled members of the Political Party set forth above, and have signed no petition inconsistent herewith, do hereby petition the Secretary of the Commonwealth to have the candidate whose Name, Occupation and Residence are as set forth above, certified to the County Board of Elections of said County or Counties in said District, to be printed on the Primary Ballot of said Party, for the Year and Office set forth above.

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3.	WR /	Jackic Brady	259	Hermitage	Phla	3 19/22
4. Isen	ell. Klemas-Brady	Irene M. Klemas-Brady	259	Hermitage	Philadelphia	3/19/22
5. And	w Bu	JIM BRENHAN	273	Hermitare	Poula	OBLABOR
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1 County	of Petition-Signers' Residence	Phila.				
	d Name of Circulator	Morris				
-	er and Street of Circulator 770	3 Kriffer S-				
	dorough or Twp. Phila	121	Zip Code P	1128		
	NOTE: THIS S	TATEMENT MUST BE COMPLETED AFT	TER ALL SIGNAT	TURES HAVE BEEN O	BTAINED.	







A. This Petition may be used to submit for Nomination the Name of One Candidate for One Office Only.

8. Complete all Blank Spaces Prior to Circulation.

C. Provide a District only if the Candidate must run in a Senatorial District or a District defined by Party Rules.

D. Please refer to the instruction page provided with this petition for detailed information about completion of this form. this form.

NAME OF OFFICE: MEMBER OF DEMOCRATIC STATE COMMITTEE

DISTRICT NUMBER: Philadelphia County 7th Senatorial District (District 507)

(Complete only if the Candidate must run in a Senatorial District or a District defined by Party Rules.)

YEAR OF PRIMARY: 2022

CANDIDATE'S NAME(PRINT OR TYPE NAME): Dustin Morris

OCCUPATION: Executive Director PA Banking and Insurance Committee

RESIDENTIAL STREET ADDRESS: 7703 Keiffer Street

CITY, BOROUGH OR TWP.: Philadelphia

COUNTY OF SIGNERS: PHILADELPHIA 51

PARTY OF SIGNERS: Democratic

OFFICIAL USE ONLY

To the SECRETARY OF THE COMMONWEALTH:

We, the undersigned, all of whom severally declare that we are qualified electors of the County and of the political district set forth above, that we are registered and enrolled members of the Political Party set forth above, and have signed no petition inconsistent herewith, do hereby petition the Secretary of the Commonwealth to have the candidate whose Name, Occupation and Residence are as set forth above, certified to the County Board of Elections of said County or Counties in said District, to be printed on the Primary Ballot of said Party, for the Year and Office set forth above.

	SIGNATURE OF ELECTOR	PRINTED NAME	ADDRE	SS WHERE REGISTE	RED AND ENROLLED	
		OF ELECTOR	House No.	Street or Road	City, Boro or Twp.	DATE OF SIGNING
1/	lances Mobighh	FRANCIS MCLAUGU	Un 346	P QUEEN LA	PHILA	3/20/20
2. R	r my	Robert Mades	3437	5 unings	111 211	3/22/22
<u>3.</u>	me Mague	MNEMAGUIR	349	COWRAG	Phila	3/20/20
	-727	ANDREW LUEllO	V 342	1 CONRAD	PHILLA	922/22
5.	inda 5 Morris	UNDASWORD	53420	2 DIVISION	5T. Phila	3-22-02
6. of	Time p. Carus	PIANCECARUSO	3450	arnwrono	PhILA	3-22-20
<u> 7 B</u>	arol A. Whottaker	Courol A. Whittaki	452	erawford	Phila.	338/22
8.	arbara Jerrel	Q BARBARA FERR	£11 344	8 CRAWFORD	PHLA	3/22/20
9. SN	usta Kutherford	SANDER PATHERBA	1 - 10	CRAWFOLD	PHIM	3/22/22
10.	DAN DI	MHARY J. LANGER	3567	INDIAN QUE	EN Phila	3/25/22
11.	lizabeth Men	Elizabeth McFARIA	Ne 3503	Coverdge	-Phila	3/23/as
12. 6	Seth Bottinger	Foith Bottingen	3429	surved	Phila	3/03/2022
13. 4	rece Givens	Tyrea Givens	3314	Operwell	Phila	03/23/22
14.	athlees with	Kathber Shunk	3446	Bluman	Phila	BAR
	SBE-SC(12/19) PHILADELPHIA 51	Department of State			Page_5_	Side 1 Bill

					Page_	Side 2
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1:	5. Th -	JOHN IN KETCY	3434	BODDER	PHLACEPUR	0/23/22
1	6. Kichard Adarby	Richard W. Gor	lear 3605	Haywoods	. Philadelphia	3/23/22
1	1. Dein Wesses	giña Weiro	3843	Corrad	ML	3/23/22
1	8. Tal Gardy	Pat Garphell	3/58	Bowner	Ohela	3/28/22
1	9. July Cooke	Tracey Cooke	3421	Conrad	Phila	3/23/20
	10. Jacquelle John	Vacquelin Rince	43417	conned	phila	3/33/4000
2	1. Qual & Coyne	Richard BOYNE	3414	MIOVALE	PHILA	3/22/22
2	2. Bergadette New Jaughle	BERNADETTE APLAUS	EULIN 346	9 QUOLL	fungerum.	3/23/22
_2	3. Kracis Mc Jany	hi Francis MY	3469 .	queen La	Phila PA	3/13/17
_2	4 Koni Mc Jaughe	A Kevn McLaughln	3617	Gypsy Law	Phila, Ph	3/23/22
2	25. Jandre Mortimore	SAHORA HONTINORE	3538	SEN BUEEU	- PHILA	5/23/22
2	26. Maly Jules Deav	of Wary Frances Dev	1443513	New Que	_ Phila	3/23/22
_2	17. Muset Derany	MARGARET DEVINEY	8513	New Queen	PHILA	3/33/22
2	28. of fun Huf O	THOMAS Hen d	3354	YAUK	PHILA	3/23/22
2	29. Million Gleun	Melissatiollower	f 33/p2	Viax	Philatelphu	3/23/22
3	30. aoch	Thotan Musho:	3471	Bow man	Phroley	313/2
		STATEMENT OF CIRCUI	LATOR		CIRCULATOR SHOULD CO	
t	state that I am a qualified elector of the Con nomination petition; that my residence is as s thereof; that their respective residences are of knowledge and belief, the signers are qualifie in this petition, and that they are residents in	et forth below; that the signers to the correctly stated therein; that each sind electors, duly registered and enrol	ne faregoing p igned on the d lled members	ecicion signed une sa are set opposite his	me with full knowledge of or her name: that to the b	est of my
1	Further, I state the information set forth here subject to the penalties of 18 Pa.C.S. § 4904 (	in is true and correct to the best of (relating to unsworn falsification to a	my knowledge authorities).	e, information and be	ellef, and that this stateme	ent is made
	1 County of Petition-Signers' Residence	hila				
1	2 Printed Name of Circulator	Mens				
١	3 Signature of Circulator	on Peler	34-		•	
	4 Number and Street of Circulator  5 City, Borough or Twp.	PA	Zip Code	101128		
1				•	•	
	NOTE: THIS S	STATEMENT MUST BE COMPLETED AFT	TER ALL SIGNA	TURES HAVE BEEN O	BTAINED.	







ATTENTION!

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	SIGNATURE OF ELECTOR	PRINTED NAME	ADDRE	SS WHERE REGISTE	RED AND ENROLLED	国を開 大学(A) 国を国
		OF ELECTOR	House No.	Street or Road	City, Boro or Twp.	DATE OF SIGNING
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2.2	pp e soin,	MADON CHASA	2901	MARKONCHA	42-841/0860	2222
3.	Joda Wrest	LUM WRIGHT	13961	Feithert of	Phila, Ra.	862/22
4/0	F Selly	Returnellow.	3901	Market	Phila.	3/27/2
5.	but Sould.	HARRIET KUIGHT	3901	Marziset,	THILA CA.	3- 22-22
	baloted Ore h-	Inste Clark	3901	MALLES	Phila la	3-22-22
7.	arean Cartie	LOREAN CARTER	340)	523 Market St	Philm. Bo	3-22-22
в. О	thingullann	ARTHORIUM! ams	39/	MARKES	Psila Pa	5-22-22
9. (	Lann	3701119	3001	1918/st	1/2/12	32/-21
10.	lavate West	Claudette Wood	390/	MARIET	Phila 1A	3-22-62
11/	avid Rives	Savid Berns	3501	Maket.	Ph /a /4	3-22-22
12/0	anne James	JOADDE JAMES	3901	MARKETST	PHILA PA.	3/22/25
13.kg	ر عامس	arelove Ana	54a	Markel	thic Pc	3/22/27
14.	James	Tanul	H Kelvill	Micrallyment	Phil. AA	3/22/22
	DSBE-SC(12/19) PHILADELPHIA 51	Department of State			Page 6	ide 1 III

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	-	SIGNATURE OF ELECTOR	PRINTED NAME	ADDRE	SS WHERE REGISTE	RED AND ENROLLED			
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15.	4	erolding Mos	Geraldine Man	39011	Varhet 8139	Lhila 19,19,	3/24	/ IQ	
16,	Ju	sty & Branch	Runtis A BRANCH	3901 7/	collect at 1	208 //	3/22/3	12	
17	96	in the Pica)	(We n-49h Drew	3901	Mark-48	M Malaya	3-22	) 2;	
18	Tru	cilla Bradley	DRUCILLA BRADLE	3901	MKT822	Phila, PA	3/22		
19.	Mi	chelle Johnson	m'chelle Johnson	3901	Majet9+ 512	Phila PA	3-22-	22	
ź0.	Py	ther benning of	ARTHUR SUM MERS	3901	MARKET-ST	PHILD DA	J-29-7	22	
2n	را ماہدر	tafardell	JUANITA BANDAIL	314	Warket I	Piela PA	3-12-	てええ	
// <sub>22</sub> .	My.	2 Lad Bonn	s MicHAELBON	15-370	MARKE	SI, Pa	3-22	20	
23.	de	2 A M	Lee J Ay	#03i0	Masket if	Asila, PA,	3-22	ર્ડે	
24.	Bo	namin Chadwid	Benjamin Chadwid	3901	5 My Ket	Philato	3-22.	222	
25.	1/0	in Brown	1/An Brown	214	3901 Marko:	Sr Philas	2,3%	32 <u>=</u>	
26.	12 V 1	¿ Harvey	Elie Harvey	3901	Market ST	Phila, R.	322	. ع ع ْ	
27,	A-71	mi Clown	Annie Gover	618	market &	pHila.PA.	3- 72-	ረኒ	
28.	Hn	war Clycland	HILLESOS Cleveland	3901	Harkerts	Lhila Par	3-22-2	'ک	
29.	110	uline Jesums	Maylane Timos	3901	Market	Thila.	3-22	-27	
30,	Da	Ma Toxes	Marcella Jones	3901	NarKet	Phils Pa	g	_	
	•		STATEMENT OF CIRCUL	_ATOR		CIRCULATOR SHOULD CO 1 - 5 BELOV			
I state that I am a qualified elector of the Commonwealth; that I am duly registered and enrolled as a member of the political party designated in this nomination petition; that my residence is as set forth below; that the signers to the foregoing petition signed the same with full knowledge of the contents thereof; that their respective residences are correctly stated therein; that each signed on the date set opposite his or her name; that to the best of my knowledge and belief, the signers are qualified electors, duly registered and enrolled members of the political party and of the political district designated									
Fur	ther, I s	tate the information set forth herei	the County specified in number one in is true and correct to the best of <i>j</i>	глу knowledge	, information and be	elief, and that this stateme	nt is made		
subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).									
1	•	lame of Circulator	AD M St	216	4.				
3 5	ignature	e of Circulator	sottl 2M	بمال	g\$/	•			
1		and Street of Circulator	SOL Morre	& Y	1017/1	•	:		
50	ity, Bor	ough or Twp	AN CHARLES	Zip Code	1-1107		•		
	NOTE: THIS STATEMENT MUST BE COMPLETED AFTER ALL SIGNATURES HAVE BEEN OBTAINED.								





