



filed in this Court pursuant to the Pennsylvania Election Code and the Court's administrative orders governing election objections.

4. Respondent filed by March 10, 2026 (the filing deadline), and this Petition is filed within the objection period set forth by the Election Code and applicable Court orders.

### III. FACTUAL ALLEGATIONS

5. Respondent's nomination petition packet includes a "Candidate's Affidavit" submitted as part of Respondent's filing, shown in Exhibit "A."
6. The "Voting Precinct Name (including Ward & Division, if applicable)" field on Respondent's Candidate's Affidavit is left blank.
7. Petitioner further avers that the Candidate's Affidavit, as submitted, is incomplete and facially defective.

### IV. LEGAL GROUNDS FOR RELIEF

8. 25 P.S. § 2870 Section 910 of the Pennsylvania Election Code requires each candidate to file an affidavit of candidacy containing the information required by statute.
9. 25 P.S. § 2870 Section 910(b) of the Pennsylvania Election Code requires that a candidate's affidavit state the candidate's election district, including the city, borough, town, or township. Respondent filed a Candidate's Affidavit on the Department of State form, which includes a field for "Voting Precinct Name (including Ward & Division, if applicable)."
10. Respondent's affidavit leaves the "Voting Precinct Name" field blank. Respondent's municipality is Shenango Township, which is divided into multiple election districts/precincts (1st District through 6th District). An excerpt of Lawrence County's election district/polling site listings showing the multiple Shenango Township districts is attached as Exhibit "B."
11. An "election district" is the voting district/precinct where electors vote at a polling place; because Shenango Township contains multiple such districts, the omitted precinct is a missing identifier.

12. The Department of State's Candidate's Affidavit instructions treat completion of the affidavit fields, including precinct identification, as part of proper filing, and provide guidance on determining the correct voting precinct. Exhibit "C."
13. Because Respondent left the Voting Precinct Name field blank, Petitioner cannot determine from the face of the affidavit which Shenango Township election district/precinct Respondent claims, and Petitioner should not be required to supply missing information that the candidate was required to provide at the time of filing.
14. Petitioner avers that, given the existence of multiple voting precincts within Shenango Township, the omission of the voting precinct name from the Candidate's Affidavit is a defect apparent on the face of the accompanying affidavit and renders the affidavit incomplete.
15. Petitioner asserts that the omission of the voting precinct name is a defect apparent on the face of Respondent's accompanying Candidate's Affidavit, rendering the affidavit incomplete and materially defective under 25 P.S. § 2937 Section 977.
16. Because the Candidate's Affidavit is incomplete, Petitioner requests that Respondent's nomination petition be set aside and Respondent's name not be placed on the ballot for the Democratic Primary Election for Representative in the General Assembly, 9th Legislative District.

#### V. WHEREFORE CLAUSE

WHEREFORE, Petitioner respectfully requests that this Honorable Court:

- A. Schedule this matter for hearing in accordance with the Court's election-objection procedures;
- B. Enter an Order setting aside Respondent's Nomination Petition and directing that Respondent's name not appear on the Democratic Primary ballot for Representative in the General Assembly, 9th Legislative District;
- C. Grant such other relief as the Court deems just and proper.

Respectfully submitted,

Jordan Byers  
706 Neshannock Blvd, New Castle, PA, 16101

(724)-730-9609  
nfan974@gmail.com  
Pro Se

### VERIFICATION

I, Jordan Byers, verify that the facts set forth in this Petition are true and correct to the best of my knowledge, information, and belief. I understand that false statements herein are made subject to the penalties of the law.

Date: March 12, 2026 /s/ Jordan Byers

### CERTIFICATE / AFFIDAVIT OF SERVICE

I certify that on March 12, 2026, I served a true and correct copy of the foregoing Petition (and Exhibits) upon:

1) Secretary of the Commonwealth (Department of State), by:

First-class mail  Hand delivery  Other: \_\_\_\_\_

Address/Email used: Secretary of the Commonwealth, Office of the Secretary, 401 North Street, Room 302, Harrisburg, PA 17120

2) Shay Micco, by:

First-class mail  Email  Other: \_\_\_\_\_

Address/Email used: 2404 Old Butler Rd, New Castle, PA, 16101

Date: March 12, 2026 /s/ Jordan Byers

## EXHIBIT LIST

Exhibit “A” – Copy of Respondent’s Candidate’s Affidavit page showing blank “Voting Precinct Name” field.

Exhibit “B” – Lawrence County Election Districts / Polling Sites, Shenango Township districts.

Exhibit “C” - Pennsylvania Department Of State frequently asked questions for completion of the Candidate’s Affidavit.

Exhibit A

<b>CANDIDATE'S AFFIDAVIT</b>	<b>PENNSYLVANIA DEPARTMENT OF STATE</b> <b>BUREAU OF ELECTIONS</b> 210 NORTH OFFICE BLDG. HARRISBURG, PA 17120	<b>OFFICE USE ONLY</b> 2026001805 
------------------------------	---	---

Name: Micco, Shay  
Last Name First Name Middle Name or Initial Suffix

Residential Address: 2404 Old Butler rd  
Street Address

City: New Castle State: PA Zip Code: 16101

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

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

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

Voting Precinct Name (including Ward & Division, if applicable): \_\_\_\_\_

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

District Number (if applicable): 9th Legislative District

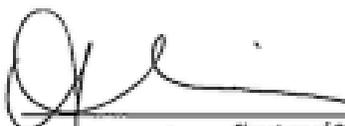
Email address: Shaymicco@gmail.com

Name as it is to appear on the Ballot: Shay Micco

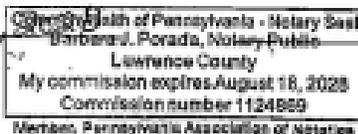
**CANDIDATE AFFIDAVIT** - I do swear (or affirm) that my residence, my election district and the title of the office for which I desire to be a candidate are as specified above, that I am eligible for said office, that I will not knowingly violate any election law or any law regulating and limiting nomination 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 \_\_\_\_\_ I swear (or affirm) to the above part(s) as required by the law(s) applicable to the office I am seeking.

9 day of March 2026  
  
 \_\_\_\_\_  
Signature of Officer Administering Affirmation  
Notary Public  
Official Title

  
 \_\_\_\_\_  
Signature of Candidate  
724 761 4157  
Telephone Number

My commission expires Aug 18, 2028



LAWRENCE  
County of Residence

**Exhibit B**

**Excerpt from Lawrence County Election Districts/Polling Sites list**

**LAWRENCE COUNTY ELECTION DISTRICTS  
75 PRECINCTS**

SHENANGO TOWNSHIP	1ST DIST	SAVANNAH UNITED METHODIST CHURCH 84 SAVANNAH GARDNER RD., NEW CASTLE
	2ND DIST	SHENANGO SPORTS COMPLEX 2550 ELLWOOD ROAD., NEW CASTLE
	3RD DIST	SHENANGO SPORTS COMPLEX 2550 ELLWOOD ROAD., NEW CASTLE
	4TH DIST	CASTLEWOOD ALLIANCE CHURCH 660 HARMONY BAPTIST RD., NEW CASTLE
	5TH DIST	SHENANGO TOWNSHIP MUNICIPAL BUILDING 1000 WILLOWBROOK RD., NEW CASTLE
	6TH DIST	INDEPENDENT METHODIST CHURCH 1921 NEW BUTLER ROAD, NEW CASTLE

## Exhibit C

### **FREQUENTLY ASKED QUESTIONS FOR COMPLETION OF THE CANDIDATE'S AFFIDAVIT**

**IMPORTANT** – PENNSYLVANIA LAW REQUIRES THIS FORM TO BE FILED WITH YOUR NOMINATION PETITION UNLESS YOU ARE SEEKING NOMINATION FOR THE OFFICE OF PRESIDENT OF THE UNITED STATES. A SEPARATE AFFIDAVIT MUST BE FILED FOR EACH OFFICE FOR WHICH YOU ARE SEEKING NOMINATION.

#### **What is my residential address?**

- Your residential address pertains to where you actually reside.

#### **What if my address is a PO BOX?**

- You cannot use a PO BOX for your residential address. You must provide a street name and number.

#### **What is my municipality?**

- Your municipality is the city, borough, or township in which you actually reside. For example, if you live in a city that has boroughs or townships, you will enter the borough or township not the city. For example, if your address is in Harrisburg, but you reside in Lower Paxton Township, then you would enter Lower Paxton Township as the municipality.

#### **How do I know the name of my voting precinct?**

- The appropriate ward, district or precinct for your residence is printed on your voter registration card. Failure to answer this question correctly could result in a rejection or challenge. If you have any questions, contact your county election office or visit <http://www.vote.pa.gov/status>.

#### **What if I want correspondence sent to another address?**

- If you wish to have correspondence sent to an address other than your residential address, please complete the MAILING ADDRESS field when completing the Candidate Survey. This address may include a PO BOX.

#### **What if I don't want my middle name to appear on the ballot?**

- Please complete the section titled, NAME AS IT IS TO APPEAR ON BALLOT. Please note, no titles such as Dr., Esq., Rev., etc. may be used.

**REMINDERS:** Please complete all the fields on the affidavit. **REMEMBER TO HAVE YOUR AFFIDAVIT NOTARIZED PRIOR TO FILING YOUR PAPERWORK.**

PLEASE **FILE EARLY** TO AVOID LONG WAIT TIMES AND POSSIBLE PROBLEMS WITH YOUR PAPERWORK!