

ELECTION

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

DEPARTMENT OF STATE
MAR 15 2026 10:34

IN RE: THE NOMINATION PETITIONS OF
TODD CRAWLEY AS A DEMOCRATIC
CANDIDATE FOR STATE REPRESENTATIVE

: ELECTION MATTER
:
: DOCKET NO:
: 109 MD 2026

PETITION TO SET ASIDE NOMINATION PETITIONS

AND NOW, come Petitioners, by their counsel, Lawrence M. Otter, Esquire, and file the within Petition and, in support thereof avers as follows:

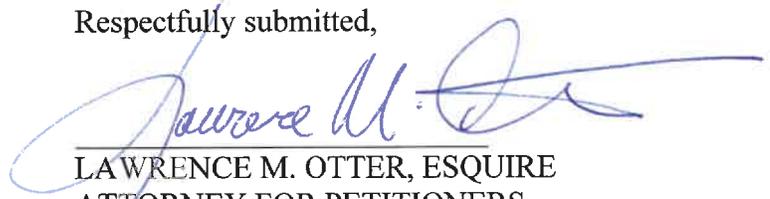
1. Exclusive jurisdiction over the subject matter of this Petition is vested in the Commonwealth Court of Pennsylvania by the provisions of the **Pennsylvania Election Code, 25 P. S. § 2937**, and the provisions of the **Judicial Code, 42 Pa. C. S. A. § 764**.
2. One Petitioner is Brandon Bloss who resides at 14 Sickles Drive, East Berlin, PA and is a duly registered and enrolled Democratic elector of the Commonwealth of Pennsylvania who votes and resides in the 193rd Legislative District.
3. One Petitioner is Heather Fisher who resides at 22 Center Square, New Oxford, PA 17350 and is a duly registered and enrolled Democratic elector of the Commonwealth of Pennsylvania who votes and resides in the 193rd Legislative District.
4. One Respondent is Todd Crawley a Democratic candidate for State Representative in 193rd Legislative District who as of March 10, 2026, allegedly resides at 500 N. Earl St., Shippensburg Township, PA .
5. One Respondent is the Secretary of the Commonwealth, whose office is located at 305 North Office Building, Harrisburg, Pennsylvania.

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6. On or about March 10, 2026 Nominating Petitions were filed with the Pennsylvania Department of State, Bureau of Elections, nominating Respondent, Todd Crawley as a Democratic candidate for State Representative in the 193rd Legislative District.
7. The nominating Petitions are purported to consist of 18 petition pages and allegedly containing 345 lines of signatures of electors supporting the nomination of Todd Crawley, Respondent.
8. Three Hundred (300) valid signatures of qualified electors who reside within the 87^h Legislative District are required by statute, **25 P. S. §2872.1 (14)** to support the Nominating Petitions of Todd Crawley in the Democratic Primary Election scheduled for May 19, 2026.
9. The Nominating Petitions of Respondent Todd Crawley 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.**
10. **Exhibit A** lists challenges to 65 lines in Todd Crawley's petitions.

WHEREFORE, Petitioner prays this Honorable Court to set aside the Nominating Petitions of Respondent, Todd Crawley for failure to obtain 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 Democratic Party candidate for State Representative in the 193rd Legislative District.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Lawrence M. Otter", with a long horizontal flourish extending to the right.

LAWRENCE M. OTTER, ESQUIRE
ATTORNEY FOR PETITIONERS
PA ATTORNEY ID 31383
PO Box 575
Silverdale, PA 18962
267-261-2948
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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/>.

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

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S
1	Directions for completing spreadsheet:																		
2	1. For each signature line that is challenged as invalid complete the information indicated for columns A through C.																		
3	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).																		
4	3. When "Other" (column R) is used, specify the exact nature of the objection in the "Describe Other" cell (column S).																		
5	4. Do not make any marks in columns T through W.																		
6	5. See the Election Spreadsheet Directions tab below for detailed directions and a legend of the objection codes.																		
7	Specific Grounds for Objection																		
8	Page	Line	County	NR	NRA	NRCP	NRD	NRDS	OC	ILL	LIO	DUP	IHA	N/I	PRI	DCS	SAC	Other	Describe Other
9		1	6 Cumberland										x						
10		1	7 Cumberland										x						
11		3	7 Cumberland			x					x								
12		3	8 Cumberland								x								
13		3	10 Cumberland			x													
14		4	2 Cumberland		x														
15		4	7 Cumberland	x	x														
16		5	2 Adams									x							
17		6	14 Cumberland								x								
18		6	16 Cumberland			x													
19		6	21 Cumberland								x								
20		6	22 Cumberland								x								
21		6	23 Cumberland								x								
22		6	24 Cumberland								x								
23		6	25 Cumberland								x								
24		6	26 Cumberland								x								
25		6	27 Cumberland								x								
26		6	28 Cumberland								x								
27		6	29 Cumberland								x								
28		6	30 Cumberland								x								
29		7	4 Cumberland								x								
30		7	5 Cumberland										x						
31		7	6 Cumberland										x						
32		8	11 Adams								x								
33		8	14 Adams								x								
34		8	14 Adams								x								
35		8	26 Adams								x								
36		9	2 Adams									x							
37		9	6 Adams									x							
38		9	9 Adams		x		x	x											
39		10	3 Adams									x							
40		10	13 Adams								x				x				
41		10	18 Adams								x								
42		10	29 Adams									x							

