

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

IN RE: NOMINATION PETITION OF
Summer Lee, Candidate for the DEMOCRATIC Nomination for
Representative In Congress in the,
12th U.S. Congressional District of Pennsylvania,
Primary Election to be held May 19, 2026

William Parker,

Petitioner/Objector,

v.

No. _____ M.D. 2026

Summer Lee,

Respondent

PETITION TO SET ASIDE NOMINATION PETITION

TO THE HONORABLE JUDGES OF THE COMMONWEALTH COURT OF
PENNSYLVANIA:

Petitioner, William Parker, by filing this Petition, respectfully states as follows:

I. PARTIES

1. Petitioner William Parker is an adult individual residing in Pittsburgh, PA, and is a qualified elector of Allegheny County, Pennsylvania. Petitioner is a registered and enrolled member of the Democratic Party and resides within the 12th U.S. Congressional District of Pennsylvania.

2. Respondent Summer Lee is a candidate who filed a nomination petition seeking placement on the Democratic Primary ballot for the office of Representative In Congress in the 12th U.S. Congressional District of Pennsylvania.

II. JURISDICTION & TIMELINESS

3. This Court has jurisdiction over this Petition because the nomination petition at issue was filed with the Secretary of the Commonwealth for a state-level office, and objections are 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" and "Candidate's 303 Nomination Petitions pages" submitted as part of Respondent's filing, shown in Exhibits "A, B."

6. The "(Residential Address, Street Address, City, Zip Code, Municipality, Voting Precinct Name)" fields on Respondent's Candidate's Affidavit are omitted, redacted and ultimately they have been crossed out. See Exhibit A.

7. The "(Residential Street Address)" on Candidate's Nominations Petitions is incorrect, misleading and replaced with a Mailing Address of 907 West Street, Suite 236, which is also clearly listed as a mailing address on Candidate's Affidavit. In violation of Pennsylvania law under 25 P.S. § 2867. See Exhibit B.

8. The Respondent's mailing address of 907 West Street, Suite 236 IS NOT a Residential Address, it's an office space that belongs to an organization named Pittsburgh United. See

Exhibit C.

9. The Respondent's actual "Summer Lee for Congress" Campaign Mailing Address is listed on Respondent's campaign website www.SummerforPa.com at 80 M St, SE, Suite 100 Washington, DC 20003. See Exhibit E.

10. Petitioner further avers that the Respondent's Candidate's Affidavit and all of the Candidate's Nomination Petitions, as submitted, are incomplete, incorrect, misleading and or facially defective.

IV. LEGAL GROUNDS FOR RELIEF

11. 25 P.S. § 2870 Section 910 of the Pennsylvania Election Code requires each candidate to file a sworn to and notarized affidavit of candidacy containing the information required by statute.

12. 25 P.S. § 2870 Section 910(b) of the Pennsylvania Election Code requires that a candidate's affidavit state the candidate's Residential Street Address, including the City, Borough, Town, or Township, Zip Code and Voting Precinct Name.

13. 25 P.S. § 2870 Section 910 of the Pennsylvania Election Code requires each candidate to collect a required amount of signatures from electors in the District in which they are running for office.

14. Respondent filed a Candidate's Affidavit on the Department of State, which includes missing fields for "Residential Street Address, including the City, Borough, Town, or Township, Zip Code and Voting Precinct Name (including Ward & Division, if applicable)."

15. Respondent's sworn to and notarized affidavit leaves the "Residential Street Address,

including the City, Borough, Town, or Township, Zip Code and Voting Precinct Name” fields omitted, redacted and ultimately crossed out.

16. In an attempt to mislead the public and or hide information from the public the Respondent used a mailing address listed on Candidate’s Affidavit in place of Candidate’s actual Residential Street Address on all 303 pages of the Candidate’s Nomination Petitions.

17. Respondent’s Residential Street Address, including the Municipality, City, Borough, Town, or Township, Zip Code and Voting Precinct Name is unknown.

18. The Candidate’s Affidavit which requires all statewide Candidates running for office in Pennsylvania to list and provide their Residential Street Address, including the Municipality, City, Borough, Town, or Township, Zip Code and Voting Precinct Name have been omitted and or redacted precluding the public from information which identifies the Candidate and the Candidate’s actual Residential Street Address and Voting Precinct.

19. The Department of State’s Candidate’s Affidavit instructions treat completion of the affidavit fields, including Residential Street Address, the Municipality, City, Borough, Town, or Township, Zip Code and Voting Precinct Name, as part of proper filing, and provide guidance on determining the correct voting precinct. See Exhibit D.

20. Because the Respondent omitted and or redacted and ultimately crossed out the Residential Street Address, including the Municipality, City, Borough, Town, or Township, Zip Code and Voting Precinct Name, Petitioner cannot fully determine from the face of the affidavit the candidate's actual residency, and Petitioner should not be required to assume or supply missing

information that the candidate and all candidates running for office in Pennsylvania are required to provide at the time of filing.

21. Petitioner avers that, the omission and or redaction of the Candidate's Residential Street Address, including the Municipality, City, Borough, Town, or Township, Zip Code and Voting Precinct Name from the Candidate's Affidavit is a defect apparent on the face of the accompanying affidavit and renders the affidavit incomplete, invalid and void.

22. Petitioner asserts that the omission or redaction of the Residential Street Address, including the Municipality, City, Borough, Town, or Township, Zip Code and Voting Precinct Name is a defect apparent on the face of Respondent's accompanying Candidate's Affidavit, rendering the affidavit incomplete, invalid, void and materially defective under 25 P.S. § 2937, 25 P.S. § 2867 and Section 977.

23. All of The Electors who signed and printed their name on the Respondent's Candidate Nomination Petitions did so believing that the correct Name, Occupation and Residence were set forth above as stated on all 303 pages of the Respondent's Candidate Nomination Petitions.

24. Because the Candidate's Affidavit is incomplete and the Candidate's Residential Street Address listed on all 303 pages of the Candidate's Nomination Petitions is misleading and incorrect, 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 Congress in the 12th Congressional District of Pennsylvania.

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. Strike and Reject Respondent's Candidate Affidavit.
- C. Strike and Reject All of Respondent's Candidate Nomination Petition pages 1 through 303.
- D. 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 Congress in the 12th U.S. Congressional District of Pennsylvania;
- E. Grant such other relief as the Court deems just and proper.

Respectfully submitted,



/s/ William Parker

10 Old Clairton Road Suite 12A-248

Pittsburgh, PA 15236

Allegheny County, 12th U.S. Congressional District of Pennsylvania

Email: Mobilize@Vote4WillParker.Com

Date: March 14, 2026

VERIFICATION

Pro Se VERIFICATION I, William Parker, 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.



/s/ William Parker

10 Old Clairton Road Suite 12A-248

Pittsburgh, PA 15236

Allegheny County, 12th U.S. Congressional District of Pennsylvania

Email: Mobilize@Vote4WillParker.Com

Date: March 14, 2026

CERTIFICATE / AFFIDAVIT OF SERVICE

I certify that on March 14, 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

Summer Lee, by:

First-class mail Email Other: _____

Address/Email used: 907 West Street, Suite 236, Wilkinsburg, PA, 15221



/s/ William Parker

10 Old Clairton Road Suite 12A-248

Pittsburgh, PA 15236

Allegheny County, 12th U.S. Congressional District of Pennsylvania

Email: Mobilize@Vote4WillParker.Com

Date: March 14, 2026

EXHIBIT LIST

Exhibit “A” – Copy of Respondent’s Candidate’s Affidavit page showing omitted and or redacted “Residential Street Address, including the Municipality, City, Borough, Town, or Township, Zip Code and Voting Precinct Name” fields.

Exhibit “B” – Copy of Respondent’s Candidate’s Nomination Petitions pages 1-303 showing “Mailing Address listed on Candidate’s Affidavit inserted and used as Candidate’s Residential Street Address.”

Exhibit “C” – Screenshot Image of Respondent’s listed Mailing Address 907 West Street, Suite 236, Wilkinsburg, PA 15221 belonging or registered to an organization named Pittsburgh United.

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

Exhibit “E” – Screenshot Image of Respondent’s actual “Summer Lee for Congress” Campaign Mailing Address listed at 80 M St, SE, Suite 100 Washington, DC 20003.

EXHIBIT A

CANDIDATE'S AFFIDAVIT	PENNSYLVANIA DEPARTMENT OF STATE BUREAU OF ELECTIONS 210 NORTH OFFICE BLDG. HARRISBURG, PA 17120	OFFICE USE ONLY 2026002018
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Name: Lee Summer Lynn
Last Name First Name Middle Name or Initial Suffix

Residential Address: [REDACTED]
Street Address

City: [REDACTED] State: PA Zip Code: [REDACTED]

Municipality (City, Boro, or Township): [REDACTED] Gender: F M NB

Mailing Address (if different from residential): 907 West Street, Suite 236
Street Address

City: Pittsburgh State: PA Zip Code: 15221

Voting Precinct Name (including Ward & Division, if applicable): [REDACTED]

Office for which you are seeking nomination: REPRESENTATIVE IN CONGRESS

District Number (if applicable): 12th Congressional District

Email address: info@summerforpa.com

Name as it is to appear on the Ballot: Summer Lee

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 28 day of February, 2026

[Signature] Ryan Morley
Signature of Officer Administering Affirmation

Notary Public
Official Title

My commission expires May 11, 2026

I swear (or affirm) to the above part(s) as required by the law(s) applicable to the office I am seeking.

[Signature]
Signature of Candidate

4435678990
Telephone Number

ALLEGHENY
County of Residence

Commonwealth of Pennsylvania - Notary Seal
 Ryan Morley, Notary Public
 Allegheny County
 My commission expires May 11, 2026
 Commission Number 1528421
 Member, Pennsylvania Association of Notaries

EXHIBIT B

**Commonwealth of Pennsylvania
DEPARTMENT OF STATE**

OFFICIAL USE ONLY



ATTENTION
A. This Petition may be used to submit for nomination the Name of One Candidate for One Office Only.
B. Please refer to the instruction page provided with this petition for detailed information about completion of this form.

NAME OF OFFICE: REPRESENTATIVE IN CONGRESS

DISTRICT NUMBER: 12th Congressional District

YEAR OF PRIMARY: 2026

CANDIDATE'S NAME (PRINT OR TYPE NAME): Summer Lee

OCCUPATION: Member of Congress

RESIDENTIAL STREET ADDRESS: 907 West Street, Suite 236

CITY, BOROUGH OR TWP.: Wilkinsburg

COUNTY OF SIGNERS: ALLEGHENY 02

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.

SIGNATURE OF ELECTOR	PRINTED NAME OF ELECTOR	ADDRESS WHERE REGISTERED AND ENROLLED			DATE OF SIGNING
		House No.	Street or Road	City, Boro or Twp.	
	Brandon Bishop	118	Carver	Pittsburgh PA	2/17/26
	Michael Szwed	7137	Penn	Pittsburgh	2-17-26
	Will Bergmann	1204	MEADE	Pittsburgh	2-17-26
	DEBORAH JENKINS	522	Franklin	Pittsburgh	2/17/26
	Theresa Bartoszewicz	431	Peabody	Pittsburgh	2-17-26
	Leanne M. Libert	7217	MEADE	Pittsburgh	2-17-26
	Claire Pilarzski	404	Woodland Ave	Oakmont, PA	2/17/26
	Kimberly James	2051	Kandorze	Pittsburgh PA	2/17/26
	K. Swandling	1180S	DAYL	Pittsburgh PA	2/17/26
	Emily Jonas	442	S. Trenton	Pittsburgh	2/17/26
	Linda Brantley	200	N. Homewood	Pittsburgh	2/17/26
	Der-Ral Patterson	408	Lamar St	Pittsburgh	2/17/26
	Alan Herbaine	2124	Walnut St	Munhall	2/17/26
	Sam Murphy	7472	Penfield CT	Pittsburgh	2/17/26

Commonwealth of Pennsylvania
DEPARTMENT OF STATE

OFFICIAL USE ONLY



ATTENTION:
A. This Petition may be used to submit for Nomination the Name of One Candidate for One Office Only.
B. Please refer to the instruction page provided with this petition for detailed information about completion of this form.

NAME OF OFFICE: REPRESENTATIVE IN CONGRESS

DISTRICT NUMBER: 12th Congressional District

YEAR OF PRIMARY: 2026

CANDIDATE'S NAME(PRINT OR TYPE NAME): Summer Lee

OCCUPATION: Member of Congress

RESIDENTIAL STREET ADDRESS: 907 West Street, Suite 236

CITY, BOROUGH OR TWP.: Wilkensburg

COUNTY OF SIGNERS: WESTMORELAND 65

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.

SIGNATURE OF ELECTOR	PRINTED NAME OF ELECTOR	ADDRESS WHERE REGISTERED AND ENROLLED			DATE OF SIGNING
		House No.	Street or Road	City, Boro or Twp.	
<i>Allen Kiconic</i>	Allen Kiconic	422	Bony Hill	Mono	2-22-26
<i>Deborah Watt</i>	Deborah Watt	4411	Good Ferry Rd	Murrysboro	2-22-26
<i>Walter P Geben</i>	WALTER P Geben	3481	RT 136	ARONA	2-22-26
<i>E. Schottler</i>	Elizabeth Schottler	124	McMahon Dr.	Penn Township	2-22-26
<i>Sandra V. Andus</i>	Sandra V Andus	205	Acacia Cir	Hempfield	2-22-26
<i>Norma Skilly</i>	Norma Skilly	450	L. Kingdon	Hempfield	2-22-26
<i>Sharon A Lukacs</i>	Sharon A Lukacs	1	Smith Hill Circle	SEWICKLEY TWP	2/22/26
<i>Emeray E. Lukacs</i>	Emeray E. Lukacs	1	SMITH HILL CIRCLE	SEWICKLEY TOWNSHIP	2/22/2026
<i>Thomas J. Kuhn</i>	Thomas J. Kuhn	973	RT 981	SMITHTON PA	2-22-26
<i>Justine Kuhn</i>	Justine Kuhn	973	RT 981	Smithton, Pa	02-22-26
<i>Deborah S Nance</i>	Deborah S Nance	4009	Park View Ct	Penn TWP	2-22-26
<i>Carol A Williams</i>	Carol A. Williams	244	Hutchinson Rd	Sewickley Twp	2/22/26
<i>Patricia Sucko</i>	Patricia Sucko	1112	10th St	Irwin	2/22/26
<i>Michelle J. Doyon</i>	Michelle J. Doyon	501	Parker Ave.	Scottsdale	2-22-26



EXHIBIT C

https://pittsburghunited.org/contact/

[Submit Message →](#)


Phone
412-231-8648


Address
Pittsburgh United
907 West St., Suite 236
Pittsburgh, PA 15212


Email
info@pittsburghunited.org

EXHIBIT D

INSTRUCTIONS FOR COMPLETION OF THE CANDIDATE'S AFFIDAVIT

IMPORTANT – PENNSYLVANIA LAW REQUIRES THIS FORM TO BE FILED WITH YOUR NOMINATION PETITION. A SEPARATE AFFIDAVIT MUST BE FILED FOR EACH OFFICE FOR WHICH YOU ARE SEEKING NOMINATION.

FREQUENTLY ASKED QUESTIONS

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 would enter the borough or township not the city. Your address may be Harrisburg but you reside in Lower Paxton Township. 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.

What if I want correspondence sent to another address?

- If you wish to have correspondence sent to an address other than your residential address, then please complete the MAILING ADDRESS field. 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 may be used such as Dr., Esq., Rev., etc.

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 WAITING IN LONG LINES AND POSSIBLE PROBLEMS WITH YOUR PAPERWORK!

EXHIBIT E

https://summerforpa.com/home/

A

The screenshot shows the home page of the Summer Lee for Congress website. The page has a black background with yellow text and accents. At the top left is the logo "SUMMER LEE FOR CONGRESS". To the right is a navigation menu with links: HOME (underlined), ISSUES, ENDORSEMENTS, DISTRICT, VOTER INFO, NEWS, ABOUT, STORE, and a partially visible "V" link. Below the navigation is a yellow horizontal bar. The main content area features the "SUMMER LEE FOR CONGRESS" logo in large yellow letters. Below the logo are links for "Privacy Policy", "Media Center", and "Contact". Further down is the text "Donate by Mail: 80 M St, SE, Suite 100, Washington, DC 20003". At the bottom are icons for Facebook, Twitter, and Instagram. A yellow-bordered box at the very bottom contains the text "PAID FOR BY SUMMER LEE FOR CONGRESS".

CERTIFICATE / AFFIDAVIT OF SERVICE

I certify that on March 14, 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

Summer Lee, by:

First-class mail Email Other: _____

Address/Email used: 907 West Street, Suite 236, Wilkinsburg, PA, 15221



/s/ William Parker

10 Old Clairton Road Suite 12A-248

Pittsburgh, PA 15236

Allegheny County, 12th U.S. Congressional District of Pennsylvania

Email: Mobilize@Vote4WillParker.Com

Date: March 14, 2026

