

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

IN RE: THE NOMINATION PERITIONS OF :ELECTION MATTER
DAVID MADSEN AS A DEMOCRATIC :
CANDIDATE FOR STATE REPRESENATIVE :DOCKET NO:
:

PETITION TO SET ASIDE NOMINATION PETITIONS

AND NOW, come Petitioner, by Shane A. STEELE, and file the within
Petition and, 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 **Pennsylvanian Election Code, 25 P.S.**
§ 2937, and the provision of the **Judicial Code, 42 Pa. C. S.**
A. § 764.
2. One Petitioner is Shane Steele who resides at 613 Barbara
Drive, Harrisburg, Pa and is a duly registered and enrolled
Democratic elector of the Commonwealth of Pennsylvania who
votes and resides in the 104th Legislative District.
3. One Respondent is Dave Madsen a Democratic candidate for State
Representative in 104th who as of March 10, 2026, allegedly
resides at 2304 Chestnut Street, Harrisburg City, PA.
4. One Respondent is the Secretary of the Commonwealth, whose
office is located at 305 North Office Building, Harrisburg,
Pennsylvania.
5. On or about March 10, 2026, Nominating Petitions were filed
with the Pennsylvanian Department of State, Bureau of
Elections, nominating Respondent, David Madsen as a Democratic

candidate for State Representative in the 104th Legislative District,

6. The nominating Petitions are purported to consist of 44 petition pages and allegedly containing 554 lines of signatures of electors supporting the nomination of David Madsen, Respondent.
7. Three Hundred (300) valid signatures of qualified electors who reside within the 104th Legislative District are required by statute, **25 P.S. §2872.1 (14)** to support the Nominating Petitions of David Madsen in the Democratic Primary Elections scheduled for May 19, 2026.
8. The Nominating Petitions of Respondent David Madsen are invalid and inadequate in that they contain less than 300 valid signatures and because of various inadequacies and deficiencies as outlined in the spreadsheet attached hereto and incorporated as **Exhibit A**.
9. **Exhibit A** lists challenges to 378 lines in David Madsen's petitions.

WHEREFORE, Petitioner prays this Honorable Court to set aside the Nomination Petitions of Respondent, David Madsen for failure to obtain 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 104th Legislative District,

Respectfully Submitted,



Shane A. Steele
Petitioner
613 Barbara Drive
Harrisburg, Pa 17111
717-599-8594
steele.a.shane@gmail.com

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

IN RE: THE NOMINATION PETITIONS OF
DAVID MADSEN AS A DEMOCRATIC

:ELECTION MATTER
:
CANDIDATE FOR STATE
REPRESENTATIVE
:DOCKET NO

ORDER

AND NOW, this _____ day of _____, 2026, it is hereby
ORDERED that the Nominating Petitions of David Madsen as a
Candidate for State Representative in the 104th Legislative
District be and hereby are stricken and dismissed, and

FURTHER ORDERED

that the name of respondent David Madsen not appear on the
ballot for the May 19, 2026 Primary Election for the Democratic
Party candidate for State Representative in the 104th Legislative
District.

BY THE COURT

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

IN RE: THE NOMINATION PETITIONS OF
DAVID MADSEN AS A DEMOCRATIC

:ELECTION MATTER
:
CANDIDATE FOR STATE
REPRESENTATIVE
:DOCKET NO

CERTIFICATE OF SERVICE

Shane A. Steele, Petitioner, hereby certifies that a true and correct copy of the within Petition with proposed order affixed thereto was duly served by Federal Express Overnight, postage or as otherwise noted on March 17, 2026 upon the following:

BY HAND
Secretary of the Commonwealth
305 North Office Building
Harrisburg, Pa 17120-0029


Shane A. Steele
Petitioner
613 Barbara Drive
Harrisburg, Pa 17111
717-599-8594
steele.a.shane@gmail.com

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/1 = 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

D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S
Specific Grounds for Objection															
NR	NRA	NRCP	NRD	NRDS	OC	ILL	LIO	DUP	IHA	N/I	PRI	DCS	SAC	Other	Describe Other
												X			
												X			
												X			
												X			
												X			