

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

IN RE: NOMINATION PETITION OF  
Martin B. Flynn,  
Candidate for the DEMOCRATIC Nomination for  
Senator in the General Assembly,  
22nd Legislative District,  
Primary Election to be held May 19, 2026

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Jeffrey Lake, :  
Petitioner/Objector, :

v. :  
: No. \_\_\_\_\_ M.D. 2026  
:

Martin Flynn, :  
Respondent. :

PETITION TO SET ASIDE NOMINATION PETITION

TO THE HONORABLE JUDGES OF THE COMMONWEALTH COURT OF  
PENNSYLVANIA:

Petitioner, Jeffrey Lake, by filing this Petition, respectfully states as follows:

I. PARTIES

1. Petitioner Jeffrey Lake is an adult individual residing at 411 N State St Apt L3, Clarks Summit, PA, 18411, and is a qualified elector of Lackawanna County, Pennsylvania. Petitioner is a registered and enrolled member of the Democratic Party and resides within the 22nd Legislative District
2. Respondent Martin Flynn is a candidate who filed a nomination petition seeking placement on the Democratic Primary ballot for the office of Senate in the General Assembly, 22nd Legislative District.

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" 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 the Borough of Dunmore, which is divided into multiple election wards/precincts (12 Precincts across 5 Wards). An excerpt of Lackawanna County's election district/polling site listings showing the multiple Borough of Dunmore districts is attached as Exhibit "B."
11. An "election district" is the voting district/precinct where electors vote at a polling place; because the Borough of Dunmore 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 Borough of Dunmore 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 the Borough of Dunmore, 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, 22nd 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, 22nd Legislative District;
- C. Grant such other relief as the Court deems just and proper.

Respectfully submitted,

Jeffrey Lake  
411 N State St Apt L3, Clarks Summit, PA, 18411  
(570) 212 - 9683  
info@jeffreylakeforpa.com  
Pro Se

VERIFICATION

I, Jeffrey Lake, 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 17, 2026 /s/ Jeffrey Lake

CERTIFICATE / AFFIDAVIT OF SERVICE

I certify that on March 17, 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) Martin Flynn, by:

First-class mail  Email  Other:

\_\_\_\_\_ Address/Email used: 211 Hill St,  
Dunmore, PA, 18512

Date: March 17, 2026 /s/ Jeffrey Lake

## EXHIBIT LIST

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

Exhibit “B” – Lackawanna County Election Districts / Polling Sites, Borough of Dunmore 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 BUREAU OF ELECTIONS</b> <small>210 NORTH OFFICE BLDG. HARRISBURG, PA 17120</small>	<b>OFFICE USE ONLY</b> <small>2026001744</small> 
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Name: Flynn, Martin, B  
Last Name First Name Middle Name or Initial Suffix

Residential Address: 211 Hill Street  
Street Address

City: Dunmore State: PA Zip Code: 18512

Municipality (City, Boro, or Township): Dunmore 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: SENATOR IN THE GENERAL ASSEMBLY

District Number (if applicable): 22nd Senatorial District

Email address: \_\_\_\_\_

Name as it is to appear on the Ballot: Marty Flynn

**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 1 day of March 2026

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

*Lynn Lynne Bisber*  
Signature of Official Administering Affirmation

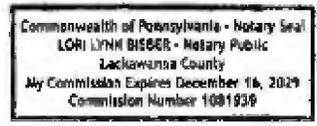
*Lynn*  
Official Title

*Marty Flynn*  
Signature of Candidate

570 4992596  
Telephone Number

My commission expires December 16, 2029

LACKAWANNA  
County of Residence



## Exhibit B

### Excerpt from Lackawanna County Election Districts/Polling Sites list

#### DUNMORE BOROUGH

1	1	Dunmore Community Center – 1414 Monroe Avenue
1	2	Sherwood Youth Association Park – 700 Sherwood Avenue
1	3	Greater Scranton YMCA – 706 N. Blakely Street
2	1	Dunmore Community Center – 1414 Monroe Avenue
2	2	Dunmore Community Center – 1414 Monroe Avenue
3	1	Dunmore Presbyterian Church – 137 Chestnut Street
3	2	Dunmore Community Center – 1414 Monroe Avenue
5		St. Rocco's Church Hall – 122 Kurtz Street
6	1	Dunmore Community Center – 1414 Monroe Avenue
6	2	Dunmore Community Center – 1414 Monroe Avenue
6	3	Dunmore Community Center – 1414 Monroe Avenue
6	4	Dunmore Community Center – 1414 Monroe Avenue

## 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!**

**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

In Re: Nom. Pet Martin B Flynn; Obj: Jeffrey Lake : New Case  
:   
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**PROOF OF SERVICE**

I hereby certify that this 17th day of March, 2026, I have served the attached document(s) to the persons on the date(s) and in the manner(s) stated below, which service satisfies the requirements of Pa.R.A.P. 121:

**Service**

Served: Flynn, Martin B  
Service Method: First Class Mail  
Service Date: 3/17/2026  
Address: 211 Hill St  
Dunmore, PA 18512  
Phone: 570-499-2596  
Representing: Respondent Flynn, Martin B

/s/ Jeffrey Lake

\_\_\_\_\_  
*(Signature of Person Serving)*

Person Serving: Lake, Jeffrey  
Attorney Registration No:  
Law Firm:  
Address: 410 N State St  
L3  
Clarks Summit, PA 18411  
Pro Se: Petitioner Lake, Jeffrey