

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

In re: The Nomination Petition filed by :  
Hiel E. Bartlett as Candidate for Member :  
of the Republican State Committee : No. 133 M.D. 2026  
McKean County (District 42) :  
: :  
Objections of: Patrick Warnick :

BEFORE: HONORABLE MICHAEL H. WOJCIK, Judge

OPINION NOT REPORTED

MEMORANDUM OPINION  
BY JUDGE WOJCIK

FILED: March 20, 2026

**MEMORANDUM and ORDER**

Presently before the Court is the Petition to Set Aside the Nomination Petition of Hiel E. Bartlett (Petition to Set Aside and Candidate, respectively) as a candidate for Member of the Republican State Committee McKean County (District 42) in the General Primary Election to be held on May 19, 2026. The counseled Petition to Set Aside was filed by Patrick Warnick (Objector).

Pursuant to Section 912.1(25) of the Pennsylvania Election Code (Election Code),<sup>1</sup> a candidate for Member of the Republican State Committee McKean County (District 42) must present at least 100 valid signatures of registered and enrolled electors of the candidate's political party. On or before March 10, 2026,

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<sup>1</sup> Act of June 3, 1937, P.L. 1333, added by the Act of December 12, 1984, P.L. 968, *as amended*, 25 P.S. §2872.1(25). Section 912.1(25) of the Election Code states: "Candidates for nomination of offices as listed below shall present a nominating petition containing at least as many valid signatures of registered and enrolled members of the proper party as listed below: . . . . [P]arty offices to be filled by a vote of the electors in counties of the sixth class at large: One hundred." *See also* Section 910 of the Election Code, 25 P.S. §2870.

Candidate filed a Nomination Petition with the Secretary of the Commonwealth to appear on the Primary Election Ballot for that office. On March 17, 2026, Objector filed the instant Petition to Set Aside alleging that the Nomination Petition is invalid because Candidate proffered 59 invalid signatures out of 120 signatures total in his Nomination Petition. For example, *inter alia*, Objector argues that some signatures were supplied by electors not registered in Candidate’s party; not registered at the given address; or after the Statement of Circulator was dated. *See* Petition to Set Aside, Exhibits B-C; 25 P.S. §§2868-2869.

On March 18, 2026, this Court entered a Scheduling and Case Management Order (CMO) scheduling a hearing on the Petition to Set Aside for March 23, 2026, at 10:00 a.m., and imposing certain duties and obligations upon Objector and Candidate. Relevant now, the CMO mandated: “Objector and Candidate or Candidate’s representative . . . shall meet to review each and every challenged signature line.” CMO at 3.A. We likewise directed “Objector and Candidate [to] file a stipulation of the parties that identifies: . . . (e) each and every signature line to be stricken as invalid . . . if the parties can reach such a stipulation.” *Id.* at 3.B.(e).

To this end, and in compliance with the CMO, the parties filed a Stipulation with this Court on March 19, 2026. The Stipulation identified the following. Candidate submitted 120 signatures in his Nomination Petition; of these 120 signatures, Objector has contested 59 of them, leaving 61 signatures uncontested. Critical now, Objector and Candidate also “stipulated and agreed . . . that each and every one of the said [59] signature lines to which a challenge/objection has been filed . . . is a valid challenge/objection and that all of the said [59] signatures shall be stricken from the Nomination Petition[] filed by

[Candidate . . .” Stipulation at 2. Candidate agreed that he would not attempt to rehabilitate any of the challenged signature lines and stipulated that he did not plan on attending this Court’s March 23, 2026 hearing. Consequently, Objector and Candidate stipulated that Candidate’s Nomination Petition should be set aside and Candidate should not appear on the May 19, 2026 General Primary Election ballot as a candidate for Member of the Republican State Committee McKean County (District 42). We adopt the above-referenced averments contained in the parties’ March 19, 2026 Stipulation,<sup>2</sup> and Objector’s Petition to Set Aside will be granted.

Accordingly, we issue the following order:

### **ORDER**

AND NOW, this 20th Day of March, 2026, it is hereby ORDERED:

1. Based on the parties’ Stipulation, the Nomination Petition of Hiel E. Bartlett as Candidate for Member of the Republican State Committee McKean County (District 42) in the General Primary Election to be held on May 19, 2026, does not contain 100 valid signatures of qualified and enrolled electors as required by Section 912.1(25) of the Election Code, 25 P.S. §2872.1(25); and the Petition to

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<sup>2</sup> The parties additionally stipulated that Objector would bear the costs of this action, because Candidate averred “he intended no willful violation of the Election Code and because of his good faith in acknowledging the validity of all [59] signature line challenges . . .” Stipulation at 3. Pursuant to Section 977 of the Election Code, this Court may “make such order as to the payment of the costs of the proceedings, including witness fees, as it shall deem just.” 25 P.S. §2937; *see also In re Farnese*, 17 A.3d 357, 370 (Pa. 2011) (An award of costs under Section 977 is “consonant with the general policy of the American Rule,” *i.e.*, “**litigants are responsible for their own litigation costs** and may not recover them from an adverse party **unless there is** express statutory authorization, **a clear agreement of the parties**, or some other established exception.”) (quotations omitted and emphasis added). As indicated, we will adopt the averments in the parties’ Stipulation including the parties’ agreement relating to costs.

Set Aside the said Nomination Petition of Hiel E. Bartlett is GRANTED. *See also* Section 977 of the Election Code, 25 P.S. §2937 (defective nomination petitions shall be set aside).

2. The Secretary of the Commonwealth of Pennsylvania is directed to REMOVE the name of Hiel E. Bartlett as a Candidate for Member of the Republican State Committee McKean County (District 42) from the ballot in the General Primary Election to be held on May 19, 2026.

3. The hearing scheduled to take place on March 23, 2026 at 10:00 a.m. in Courtroom No. 815 of the City-County building at 414 Grant Street, Pittsburgh, Pennsylvania is CANCELLED.

4. Per the Stipulation, Objector Patrick Warnick shall bear the costs of this action. The parties may file a bill of costs in this Court as outlined above.

5. The Prothonotary shall notify the parties hereto and their counsel of this order and shall also certify a copy hereof to the Secretary of the Commonwealth of Pennsylvania forthwith.

*Michael H. Wojcik*  
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MICHAEL H. WOJCIK, Judge