

# ELECTION

## IN THE COMMONWEALTH COURT OF PENNSYLVANIA

IN RE: :  
: ELECTION MATTER  
THE NOMINATING PETITIONS OF :  
: DOCKET  
COLETTE LEECH AS A CANDIDATE :  
: 137 MD 2022  
FOR REPUBLICAN STATE COMMITTEE :

**PETITION TO SET ASIDE NOMINATING  
PETITIONS AND PAPERS OF COLETTE LEECH  
FOR THE POSITION OF REPUBLICAN STATE COMMITTEE MEMBER**

**AND NOW**, Comes Petitioner, Tonya Clark, a duly qualified elector for the County of Bedford, seeking to set aside the Nominating Petitions and Papers of Colette Leech, and in support there of, 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) Petitioner Tonya Clark resides at 2825 Chalybeate Road, Bedford, PA and is a duly registered and enrolled Republican elector of the Commonwealth of Pennsylvania who votes and resides in the County of Bedford, Pennsylvania.

3) Respondent Colette Leech, a candidate for Republican State Committee Member in Bedford County, Pennsylvania, resides at 3692 Cortland Road, New Paris, PA.

4) Respondent Veronica Degraffenreid is the Secretary of the Commonwealth has office located at 305 North Office Building, Harrisburg, PA.

5) On or about March 28, 2022, Nominating Petitions and Papers were filed with the Pennsylvania Department of State, nominating Respondent Colette Leech as a

RECEIVED  
COMMONWEALTH COURT  
OF PENNSYLVANIA  
2022 MAR 31 PM 3:04

Candidate for Republican State Committee Member representing Bedford County, Pennsylvania.

6) The nominating Petitions and Papers consisted of 5 pages and contained 107 signatures of purported eligible electors supporting the nomination of Respondent Colette Leech.

7) One hundred (100) valid signatures of qualified electors who reside within the County of Bedford are required by statute to support the nomination of Colette Leech in order for her to appear on the ballot for the position of State Committee Member. **25 P. S. §2872.1 (30).**

8) The Nominating Petitions and Paper of Respondent Colette Leech are invalid and defective in that they contain less than the required 100 valid signatures of legally eligible voters.

9) The Nominating Petitions and Papers of Respondent Colette Leech contain a multitude of deficiencies, including, but not limited to voters not registered as members of the Republican Party, as outlined in the spreadsheet attached hereto and incorporated as Exhibit A.

10) Exhibit A, attached hereto, outlines the 26 challenges to the Nominating Petitions and Papers of Respondent Colette Leech.

**WHEREFORE**, Petitioner Tonya Clark, respectfully request this Honorable Court set aside the Nominating Petition and Papers of Colette Leech for failure to submit the legally required number of valid qualified signatures of electors for the position of Republican State Committee Member, and direct that her name not appear

on the ballot for the position of Republican State Committee Member in the upcoming election.

Respectfully submitted:



Tonya Clark

2825 Chalybeate Road

Bedford, PA 15522

814-934-7016

Email: [tclarkgopwoman@hotmail.com](mailto:tclarkgopwoman@hotmail.com)

**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

**IN RE:** :  
 :  
**THE NOMINATING PETITIONS OF** : **ELECTION MATTER**  
**COLETTE LEECH AS A CANDIDATE** : **DOCKET**  
**FOR REPUBLICAN STATE COMMITTEE** : **\_\_\_\_\_ MD 2022**

**ORDER OF COURT**

AND NOW, this \_\_\_\_\_ Day of April, 2022, it is hereby Ordered and Decreed that the Nominating Petitions and Papers of Colette Leech as a Candidate for Republican State Committee for the County of Bedford are hereby stricken, and the name of Colette Leech shall not appear on the ballot for the May 17, 2022 Primary Election.

BY THE COURT

\_\_\_\_\_  
J.

**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

**IN RE:** :  
 :  
**THE NOMINATING PETITIONS OF** : **ELECTION MATTER**  
**COLETTE LEECH AS A CANDIDATE** : **DOCKET**  
**FOR REPUBLICAN STATE COMMITTEE** : **\_\_\_\_\_ MD 2022**

**CERTIFICATE OF SERVICE**

I, Tonya Clark, do hereby certify that on March 31, 2022, I caused to be served by both Regular U.S. Mail and Certified Mail, a true and correct copy of the above captioned foregoing **PETITION TO SET ASIDE NOMINATING PETITIONS AND PAPERS OF COLETTE LEACH FOR THE POSITION OF REPUBLICAN STATE COMMITTEE MEMBER** on the following person and at the location described below:

Veronica Degraffenreid  
Secretary of the Commonwealth  
305 North Office Building, Harrisburg, PA.

I also served by email:

Colette Leech  
[kendyllskorner@gmail.com](mailto:kendyllskorner@gmail.com)

Date: **3-31-2022**



Tonya Clark  
2825 Chalybeate Road  
Bedford, PA 15522  
814-934-7016  
Email: [tclarkgopwoman@hotmail.com](mailto:tclarkgopwoman@hotmail.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**

**Il = 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**

Page Number	Line Number	County	Reason	*Other
	1	3 Bedford	NRA	
	1	5 Bedford	Other	NR Republican
	1	6 Bedford	Other	NR Republican
	2	1 Bedford	IHA	
	2	2 Bedford	IHA	
	2	11 Bedford	Other	NR Republican
	2	15 Bedford	PRI-IHA	
	3	12 Bedford	ILL	
	3	14 Bedford	Other - NRA	NR Republican
	3	15 Bedford	Other	NR Republican
	4	2 Bedford	NRA	
	4	18 Bedford	NRA	
	4	19 Bedford	NRA	
	4	21 Bedford	ILL	
	4	29 Bedford	NRA	
	4	30 Bedford	NR	
	5	2 Bedford	IHA	
	5	3 Bedford	IHA	
	5	4 Bedford	NRA	
	5	8 Bedford	NRA	
	5	9 Bedford	NR	
	5	11 Bedford	Other-IHA	name misspelled
	5	12 Bedford	Other-IHA	Inactive Status-name misspelled
	5	15 Bedford	NRA	
	5	29 Bedford	NI	
	5	30 Bedford	NRA-LIO	