

In Re: Nomination Petition of Amen Brown as
Democratic Candidate for Representative in the
General Assembly for the 10th District of
Philadelphia

ELECTION MATTER

No:

Objection of: Sajda Blackwell

PETITION TO SET ASIDE NOMINATION PETITION

Petitioner, Sajda Blackwell, by and through counsel, respectfully aver the following:

1. The Petitioner is a duly qualified elector resident in the same listed Judicial District and party as the Candidate.
2. The respondent is the above reference Democratic Candidate for Representative in the General Assembly, District 10.
3. On or before March 28, 2022, the Candidate filed Nomination Petitions with the Department of State.
4. Candidate signed the affidavit and affixed his current address in Philadelphia as 33 S. Ruby St. A copy is attached as *Exhibit A*.
5. The qualification requirements to run for public office as Representative in General Assembly are 21 years of age, 4 year inhabitant of State, 1 year inhabitant of District, and U.S Citizen for 4 years.
6. Candidate’s current address is in the old 190th District and the new 10th District.
7. While Candidate’s previous address, 3600 Conshohocken Ave, is both in the old and new 190th district, not in the 10th district.
8. Candidate changed addresses on December 20, 2021 and remained in the 190th District with the new address until the new districting.
9. Accordingly, Candidate has only been in the 10th District for approximately 3 months and does not have the required time to run as Representative in General Assembly for the 10th District and instead should be running for the 190th District.
10. Furthermore, there is reason to believe that Candidate does not actually reside at 33 S. Ruby Street, which furthers the point that he is not qualified to run for the 10th District.
11. The affidavit states: “I do swear (or affirm) that my residence, my election district and the name of the office for which I desire to be a candidate are as specified below, that I am eligible for said office, and that I will not knowingly violate any election law or any law regulating and limiting nomination” *DSBE-PBCA*
12. As a current elected official, Candidate is aware of the requirements necessary to run and qualify for office in any particular district and has not met those requirements in violation of his signed affidavit.

13. Section 910 of the Election Code, 25 P.S. §2870, provides that nomination petitions must contain a Candidates Affidavit.
14. Since Candidate's Affidavit is false and deceptive in nature, it is therefore not amendable and is void.
15. Therefore, Candidate's nomination petitions do not contain a Candidate Affidavit and Candidate is not eligible for placement on the ballot.
16. Petitioner requests that Candidate's nomination petitions are set aside.
17. Petitioner respectfully reserve the right to add such additional objections as are appropriate at the time of hearing.


WHEREFORE, for each of the aforementioned reasons, the Nomination Petition therefore fails to conform to the requirements of the Election Code, 25 P.S. §2870 et seq., and must be set aside and the Candidate's name not be placed on the ballot or stricken from the ballot. Furthermore, there is a request for attorney's fees in the amount \$4000 due to the bad faith, fraud and ethical violations with the actions taken and all cost and fees associated with the filing of this petition and any other damages allowable under the law.

Respectfully submitted,

Date: March 31, 2022

/s/ Terri M. Booker, Esquire
Terri M. Booker, Esquire
TMB ESQUIRE, LLC
PO BOX 13363
Philadelphia, Pa 19101
267.709.4592
Attorney for Sadja Blackwell

Exhibit A

CANDIDATE'S AFFIDAVIT	PENNSYLVANIA DEPARTMENT OF STATE BUREAU OF ELECTIONS 210 NORTH OFFICE BLDG. HARRISBURG, PA 17120	OFFICE USE ONLY 3022000881 
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Name: Brown Amen _____
Last Name First Name Middle Name or Initial Suffix

Residential Address: 33 S Ruby Street, APT 1
Street Address

City: Philadelphia State: PA Zip Code: 19139

Municipality (City, Boro, or Township): Philadelphia Gender: F M NB

Mailing Address (if different from residential): _____
Street Address

City: _____ State: _____ Zip Code: _____

Voting Precinct Name (including Ward & Division, if applicable): Philadelphia 60th Ward 4th Division

Office for which you are seeking nomination: REPRESENTATIVE IN THE GENERAL ASSEMBLY

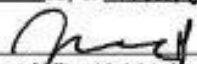
District Number (if applicable): 10th Legislative District

Email address: _____

Name as it is to appear on the Ballot: Amen Brown

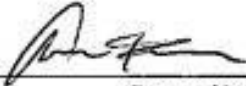
CANDIDATE AFFIDAVIT - I do swear (or affirm) that my residence, my election district and the title of the office for which I desire to be a candidate are as specified above, that I am eligible for said office, that I will not knowingly violate any election law or any law regulating and limiting nomination 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

21st day of March 20 22

Signature of Officer Administering Affirmation
Notary Public
Official Title

My commission expires 1-25-2025

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


Signature of Candidate
267 581 8127
Telephone Number

PHILADELPHIA
County of Residence

