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COMMONWEALTH COURT
OF PENNSYLVANIA
2024 FEB 20 PM 10:26

OTC ELECTION

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

IN RE: THE NOMINATION PETITIONS OF ANJU SINGH AS A DEMOCRATIC CANDIDATE FOR STATE REPRESENTATIVE IN THE 106TH LEGISLATIVE DISTRICT : **ELECTION MATTER**
: **DOCKET NO:**
: **83 MD 2024**

PETITION TO SET ASIDE NOMINATING PETITIONS

AND NOW, come Petitioners, by their counsel, Lawrence M. Otter, Esquire, and file the within Petition 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 **Pennsylvania Election Code, 25 P. S. § 2937**, and the provisions of the **Judicial Code, 42 Pa. C. S. A. § 764**.
2. One Petitioner is David S. Gash, who resides at 226 Hartley Rd Apt 2, Hershey, PA 17033, and is a duly registered and enrolled Democratic Party elector of the Commonwealth of Pennsylvania who votes and resides in the 106th Legislative District.
3. One Petitioner is Joseph S. Mihalik, who resides at 622 Linden St, Hershey PA 17033, and is a duly registered and enrolled Democratic Party elector of the Commonwealth of Pennsylvania who votes and resides in the 106th Legislative District.

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FEB 20 2024

DEPARTMENT OF STATE
EXECUTIVE OFFICE

12:13 pm

A.G.

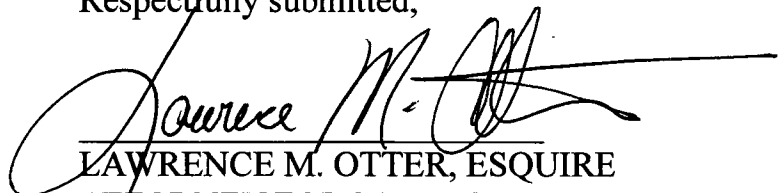
4. One Respondent is Anju Singh, a candidate for State Representative in 106th Legislative District who as of February 13, 2024, allegedly resides at 103 Cardinal Lane, Hummelstown, PA 17036
5. One Respondent is Al Schmidt, the Secretary of the Commonwealth, whose office is located at 305 North Office Building, Harrisburg, Pennsylvania.
6. On or about February 13, 2024, Nominating Petitions were filed with the Pennsylvania Department of State, Bureau of Elections, nominating Respondent, Anju Singh, as a Democratic candidate for State Representative in the 106th Legislative District.
7. The nominating Petitions are purported to consist of thirteen (13) petition pages and allegedly containing 321 lines of signatures of electors supporting the nomination of Respondent Anju Singh.
8. Three Hundred (300) valid signatures of qualified electors who reside within the 119th Legislative District are required by statute, **25 P. S. §2872.1 (14)** to support the Nominating Petitions of Anju Singh in the Primary Election scheduled for April 23, 2024.
9. The Nominating Petitions and Papers of Respondent Anju Singh are invalid and inadequate in that they contain less than 300 valid signatures

and because of various inadequacies and deficiencies as outlined in a spreadsheet attached hereto and incorporated as **Exhibit A**.

10. Service upon the candidate was effectuated pursuant to the Order of this Court by the posting of this petition on the Commonwealth Court Docket.

WHEREFORE, Petitioner prays this Honorable Court to set aside the Nominating Petitions of Respondent Anju Singh since he lacks the 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 106th Legislative District.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Lawrence M. Otter", is written over a horizontal line. The signature is stylized and extends to the right of the line.

LAWRENCE M. OTTER, ESQUIRE
ATTORNEY FOR PETITIONERS
PA ATTORNEY ID 31383
PO Box 575
Silverdale, PA 18962
267-261-2948
Email: larryotter@hotmail.com

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

**IN RE: THE NOMINATION PETITIONS OF : ELECTION MATTER
ANJU SINGH AS A DEMOCRATIC :
CANDIDATE FOR STATE REPRESENTATIVE : DOCKET NO:
IN THE 106TH LEGISLATIVE DISTRICT : MD 2024**

ORDER

AND NOW, this _____ day of _____, 2024, it is hereby

ORDERED that the Nominating Petitions of Anju Singh as a Candidate for State Representative in the 106th Legislative District be and hereby are stricken and dismissed, and

FURTHER ORDERED

that the name of respondent Anju Singh not appear on the ballot for the April 23, 2024 Primary Election for the Republican Party candidate for State Representative in the 106th Legislative District.

BY THE COURT

J.

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

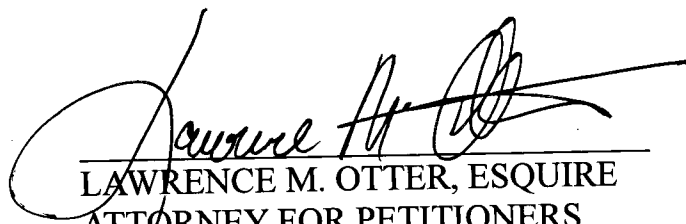
**IN RE: THE NOMINATION PETITIONS OF : ELECTION MATTER
ANJU SINGH AS A DEMOCRATIC :
CANDIDATE FOR STATE REPRESENTATIVE : DOCKET NO:
IN THE 106TH LEGISLATIVE DISTRICT : MD 2024**

CERTIFICATE OF SERVICE

Lawrence M. Otter, Esquire, counsel for Petitioner, hereby certifies that a true and correct copy of the within Petition with proposed order affixed thereto was duly served on February 20, 2024 upon the following:

BY HAND

Secretary of the Commonwealth
305 North Office Building
Harrisburg, PA 17120-0029



LAWRENCE M. OTTER, ESQUIRE
ATTORNEY FOR PETITIONERS
PO BOX 575
SILVERDALE, PA 18962
267-261-2948

Email: larryotter@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/>.

Spreadsheet columns shall include, for each challenged signature line on the nomination petition/paper: 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 (challenge codes key):

NR –	Not Registered
NRA –	Not Registered at Address
NRCP –	Not Registered in Candidate's Party
NRD –	Not Registered in District
NRDS –	Not Registered on Date Signed
OC –	Out of County
ILL –	Illegible
LIO –	Line Information Omitted
DUP –	Duplicate
IHA –	Line Information in Hand of Another
N/I –	Nickname/Initial
PRI –	Printed Signature
DCS –	Defective Circulator Statement
SAC –	Signed After Circulator's Statement Dated
Other –	Any ground for objection not listed above

SEE EXCEL SPREADSHEET FOLLOWING

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	
1	Directions for completing spreadsheet:																								
2	1. For each signature line that is challenged as invalid complete the information indicated for column A through C.																								
3	2. Indicate the ground or grounds that allegedly render the signature line invalid by inserting an "X" in the appropriate column (columns D through R).																								
4	3. When "Other" (column R) is used, specify the exact nature of the objection in the "Describe Other" cell (column S).																								
5	4. Do not make any marks in columns T through W.																								
6	5. See the Election Spreadsheet Directions tab below for detailed directions and a legend of the objection codes.																								
7	Page	Line	County	NR	NRA	NRCP	NRD	NRDS	OC	ILL	LIO	DUP	IHA	W/I	PRI	DCS	SAC	Other	Describe Other	S/S	V/S	S/CT	V/CT		
8	9	1	5 Dauphin								X							X	Other	Describe Other					
9	10	1	10 Dauphin								X							X	Other	Describe Other					
10	11	1	24 Dauphin								X							X	Name Mat	Summer Jo Hartlieb					
11	12	1	28 Dauphin								X							X	Other	Describe Other					
12	13	1	29 Dauphin								X							X	Other	Describe Other					
13	14	1	30 Dauphin								X							X	Other	Describe Other					
14	15	2	14 Dauphin								X							X	Other	Describe Other					
15	16	3	1 Dauphin								X							X	Other	Describe Other					
16	17	3	29 Dauphin								X							X	Other	Describe Other					
17	18	5	5 Dauphin								X							X	Other	Describe Other					
18	19	5	8 Dauphin								X							X	Other	Describe Other					
19	20	6	2 Dauphin								X							X	Other	Describe Other					
20	21	6	9 Dauphin								X							X	Other	Describe Other					
21	22	6	13 Dauphin								X							X	Other	Describe Other					
22	23	6	15 Dauphin								X							X	Other	Describe Other					
23	24	6	18 Dauphin								X							X	Other	Describe Other					
24	25	7	22 Dauphin								X							X	Other	Describe Other					
25	26	7	24 Dauphin								X							X	Other	Describe Other					
26	27	8	1 Dauphin								X							X	Other	Describe Other					
27	28	8	7 Dauphin								X							X	Other	Describe Other					
28	29	8	22 Dauphin								X							X	Other	Describe Other					
29	30	9	4 Dauphin								X							X	Other	Describe Other					
30	31	9	6 Dauphin								X							X	Other	Describe Other					
31	32	9	12 Dauphin								X							X	Other	Describe Other					
32	33	9	18 Dauphin								X							X	Other	Describe Other					
33	34	9	22 Dauphin								X							X	Other	Describe Other					
34	35	9	28 Dauphin								X							X	Other	Describe Other					
35	36	9	29 Dauphin								X							X	Other	Describe Other					
36	37	11	13 Dauphin								X							X	Other	Describe Other					
37	38	11	14 Dauphin								X							X	Other	Describe Other					
38	39	11	16 Dauphin								X							X	Other	Describe Other					
39	40	11	17 Dauphin								X							X	Other	Describe Other					
40	41	11	25 Dauphin								X							X	Other	Describe Other					
41	42	12	3 Dauphin								X							X	Other	Describe Other					
42	43	12	9 Dauphin								X							X	Other	Describe Other					
43	44																			Describe Other					
44	45																			Describe Other					
45	46																			Describe Other					
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