

175 MO 2022

In The Commonwealth Court Of Pennsylvania

Matthew C. Schutter  
Plaintiff,

Case NO:

V.

Bethney Finch  
Defendant

RECEIVED  
COMMONWEALTH COURT  
OF PENNSYLVANIA  
2022 APR -4 AM 10:57

**Complaint**

Plaintiff, Matthew C. Schutter (hereinafter "Plaintiff") objects to the Defendants Bethney Finch's Republican Nomination Petition for the 132nd Legislative District Representative in the General Assembly. The Defendant Bethney Finch (hereinafter referred to as "Defendant"), and in support thereof alleges as follows:

**Venue And Jurisdiction**

1. Plaintiff is a registered Republican, and votes in South Whitehall Township within Lehigh County Pennsylvania.
2. Defendant is a registered Republican, and votes in South Whitehall Township within Lehigh County Pennsylvania.
3. Defendant filed a Republican Nomination Petition to run as a candidate for the 132nd Legislative District Representative in the General Assembly with the Pennsylvania Department of State.
4. Defendant did not file her statement of circulator correctly according to the election statute Title 25 P.S. 2869 on pages 1 through 23. Page 26 through 32. Page 35 through 43, and page 45. All pages mention the Defendant wrote Allentown in municipality which is incorrect.
5. Defendant has several invalid signatures on her Republican Nomination Petition making her fall short of the 300 required signatures for the 132nd Legislative District.
6. Plaintiff objects to the Defendant's Nomination Petition, and is in accordance within Title 25 P.S. 2937
7. Plaintiff used the spreadsheet this court provide to file his objections
8. Plaintiff prays that this court will set aside the Republican Nomination Petition of Bethney Finch for 132nd Legislative District Representative in the General Assembly.

9. Plaintiff seeks \$500.00 for his time of this lawsuit and research of the Defendant's Nomination Petition.

*Matthew C. Schutter*  
Matthew C. Schutter  
4346 Schaller Drive  
Allentown Pa, 18104  
484-464-7674  
mattschutter@gmail.com

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing document has been served upon :

Vernissa Degraffenwid  
210 North Office Building  
401 North St

Harrisburg PA 17120  
[Insert Attorney's Name/Address and Indicate Attorney for Appellant or Appellee]

by placing the same, postage prepaid in the United States Mail on this the 4<sup>th</sup> day of April, 2022

Matthew C. Schuman  
[Signature]

4344 S. Miller Drive  
Allentown PA 18104  
[Party's address]

[Indicate here if acting *pro se*]

DEPARTMENT OF STATE  
BUREAU OF CIL

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