IN THE COMMONWEALTH COURT OF PENNSYLVANIA

IN RE NOMINATION PAPERS OF No.

CONSTITUTION PARTY, JAMES N. CLYMER, STEVEN E. SYLVESTER, MAGILL, JUSTIN ALAN L.

GOODRICH, SR., TROY BOWMAN,

AND BERNARD SELKER

ASHLEY BOOP

Objector

NOTICE TO PLEAD

TO THE CONSTITUTION PARTY:

You are hereby notified to file a written response to the enclosed Petition to Set Aside the Nomination Papers within twenty (20) days or such other time as the Court may establish or a judgment may be entered against you.

Respectfully submitted,

Date: August 8, 2024 /s/Walter S. Zimolong

 $\overline{\text{Walter S. Z}}$ IMOLONG III, ESQ. Attorney I.D. No. 89151 wally@zimolonglaw.com JAMES J. FITZPATRICK III, ESQ. ATTORNEY I.D. No. 320497 james@zimolonglaw.com

Zimolong, LLC

P.O. Box 552 Villanova, PA 19085

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

IN RE NOMINATION PAPERS OF : No.

CONSTITITION PARTY, JAMES N. CLYMER, STEVEN E. SYLVESTER, JUSTIN L. MAGILL, ALAN R.

GOODRICH, SR., TROY BOWMAN,

AND BERNARD SELKER

:

ASHLEY BOOP

:

Objector

:

PETITION TO SET ASIDE NOMINATION PAPERS

Pursuant to 25 P.S. § 2937, Petitioner/Objector, Ashley Boop, submit this Petition to Set Aside the Nomination Papers of the Constitution Party and avers as follows:

PARTIES AND JURISDICTION

- 1. Petitioner/Objector, Ashley Boop is a qualified elector of the Commonwealth of Pennsylvania, a citizen of the Commonwealth, and a taxpayer of the Commonwealth, who resides in Lancaster.
- 2. The Court has original jurisdiction over this Petition under 42 Pa.C.S. § 764(2) and 25 P.S. § 2937.

BACKGROUND

- 3. On August 1, 2024, the Constitution Party, a political body, filed nomination papers with the Secretary of the Commonwealth seeking to nominating the following persons as candidates for the statewide offices:
 - a. James N. Clymer ("Clymer") President,
 - b. Steven E. Sylvester ("Sylvester") Vice-President,
 - c. Justin L. Magill ("Magill") Attorney General,
 - d. Alan R. Goodrich, Sr. ("Goodrich") Auditor General,
 - e. Troy Bowman ("Bowman") Treasurer, and
- f. Bernard Selker ("Selker") United States Senator (the "Constitution Party Nomination Papers") and asking the Commonwealth to place the names of those individuals on the ballot for the November 5, 2024 General Election. Copies of the Constitution Party Nomination Papers affidavits are attached at Exhibit "A."
- 4. The Constitution Party Nomination Papers also identify nineteen (19) individuals for Presidential Electors. *Id*.

- 5. Each proposed candidate is a candidate for statewide office.
- 6. The Constitution Party Nomination Papers should be set aside because they do not append candidate's affidavits for each proposed candidate.
- 7. Under the Pennsylvania Election Code, the Constitution Party is qualified as a political body because it did not have a candidate that obtained at least two percent of the largest vote cast for any candidate for statewide office in the last general election. 25 P.S. § 2831(c).
- 8. The Pennsylvania Election Code requires nomination papers of a political body to include "an affidavit of each candidate nominated." 25 P.S. 2911(e).
- 9. The Constitution Party Nomination Papers fail to include affidavits of candidate affidavits for Clymer and Sylvester, the candidates identified on the Constitution Party Nomination Papers for President and Vice-President, respectfully.
- 10. "[I]t has long been the case that a candidate's failure to present and file an affidavit of candidacy with his or her nomination paper is a fatal defect necessitating its rejection. *In re Scroggin*, 237 A.3d 1006, 1019 (Pa. 2020).

11. Accordingly, the Court should set-aside the entire slate of candidates appearing on the Constitution Party Nomination Papers.

PRAYER FOR RELIEF

WHEREFORE, Petitioner/objector respectfully request that Court enter an order under 25 P.S. § 2937:

- (a) Sustaining Petitioner's Objections to the Constitution Party

 Nomination Papers;
- (b) Setting aside the Constitution Party Nomination Papers;
- (c) Directing the Secretary of the Commonwealth not to certify the names of candidates appearing on the Constitution Party Nomination Papers for the November 5, 2024 General Election as a candidates for President, Vice-President, Attorney General, Auditor General, Treasurer, or United States Senator;
- (d) Directing the Constitution Party to pay costs and fees of the proceedings pursuant to this Court's discretion under 25 P.S. § 2937; and
- (e) Granting all further and necessary relief.

Respectfully submitted,

Date: August 8, 2024

/s/Walter S. Zimolong
Walter S. Zimolong III, Esq.
Attorney I.D. No. 89151
wally@zimolonglaw.com
James J. Fitzpatrick III, Esq.
Attorney I.D. No. 320497
james@zimolonglaw.com
Zimolong, LLC
P.O. Box 552
Villanova, PA 19085-0552
Tele: 215-665-0842

Attorneys for petitioner/objector

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving the foregoing document upon the persons and in the manner indicated below, which service satisfies the requirements of Pa.R.A.P. 121 and the Pennsylvania Election Code:

Via Email and Hand Delivery

Secretary of the Commonwealth Pennsylvania Department of State 401 North Street Harrisburg, PA 17120

Via Court's Website as per July 19, 2023 Standing Order Constitution Party

Respectfully submitted,

Date: August 8, 2024

/s/Walter S. Zimolong
Walter S. Zimolong III, Esq.
Attorney I.D. No. 89151
wally@zimolonglaw.com
James J. Fitzpatrick III, Esq.
Attorney I.D. No. 320497
james@zimolonglaw.com
Zimolong, LLC
P.O. Box 552
Villanova, PA 19085-0552
Tele: 215-665-0842

Counsel for Petitioner/objector

CERTIFICATE OF COMPLIANCE

I, Walter S. Zimolong, counsel for petitioner, certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than nonconfidential information and documents.

Date: August 8, 2024

/s/ Walter S. Zimolong
Walter S. Zimolong, Esq.
ZIMOLONG, LLC
wally@zimolonglaw.com
353 W. Lancaster Avenue,
Suite 300
Wayne, PA 19087
P: (215) 665-0842

VERIFICATION

I, ASNEY BOOP, verify that that the facts contained in the foregoing are true and correct based upon my knowledge, information, and belief. However, while the facts are true and correct based upon my knowledge, information, and belief, the words contained in the foregoing are those of counsel and not mine. I understand that statements herein are made subject to the penalties set forth in 18 Pa. C.S.A. §4904 relating to unsworn falsification to authorities.

EXHIBIT "A."

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF STATE Bureau of Elections



POLITICAL BODY CANDIDATE'S AFFIDAVIT

COUNTY OF TIGAL	. (0	
Name: Goodrick , Last Name	Alan	,	K.	<u>, 5-</u>
Residential Address: 209 N. Holden			Middle Name or Initial	Suffix
		State: PA	Zip Code: 1694	<u> </u>
Municipality (City, Boro, or Township): 05		•	Gender: F	
Mailing Address (if different from residential):				,
City:		State:	Zip Code:	
Election District of Candidate (district where re	gistered to vote):			
Office for which you are seeking nomination:	A. J. to 1	neneral		-
Email address: Grandrich @ ju	no · um			
Email address: 67 good vich 6 ju Name as it is to appear on the Ballot:	Bub G000	rich		·-· -
have I been nominated by any other nomination or municipal election I shall not be a registered thirty (30) days prior to the primary up to and it a candidate for election at a special election I at a candidate for an office which I already hold, to this affidavit. Sworn (or affirmed) and subscribed before me	and enrolled men neluding the day of um not a registered the term of which	nber of a political of the following ge I and enrolled mer is not set to expire I swear (or	party at any time dur meral or municipal el mber of a political pa	ing the period of ection, or if I am rty; that I am not the office subject parts as required
		- ,	rr	
day of20	_	asy	nch iel	
Signature of Officer Administering Affirmation	_		Signature of Candidate	
		(814)	258.5218	
Official Title		- /	Telephone Number	
My commission expires		T100	County of Residence	
			County of Residence	<u> </u>
	OFFICE USE (NLY		
COUNTY CODE \$ 200.00				



Bureau of Elections 717-787-5280

CANDIDATE DECLARATION to be attached to CANDIDATE'S AFFIDAVIT where notarized statement is not available

CANDIDATE DECLARATION - I declare that my residence, my election district and the title of the office for which I desire to be a candidate are as contained in the attached document, 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 the accompanying affidavit.

I declare under penalty of perjury under the law of the Commonwealth of Pennsylvania that the foregoing is true and correct.

Signed on the 31 (date) day of July (month),	2024	(year), at	
Trogs Gunty, Pennsylv4county or other location, and state),	USA	(country).	2024
Alan R. Gooden Se (printed name)		1) 1) 1)	B
argueil		Organia Garage Garage Garage Garage	70
(signature)		ام _ن دا	

	MMONWEALTH OF PENNSYLVANIA C-1 (Rev. 01/24) STATEMENT OF FINANCIAL INTERESTS SEE INSTRUCTIONS FOR ADDITIONAL DETAILS PENNSYLVANIA STATE ETHICS COMM (717) 783-1610 - TOLL FREE 1-800-9	
01		_
	GOODRICH ALAN RSR	<u>'</u>
02	ADDRESS office (business or governmental) or home City USCULA State Zip Code Area Code Phone PA 16942-0013 E14, 258-5218	_
_	NOTE: IF YOU ARE INCLUDING ATTACHMENTS, DO NOT INCLUDE ANYTHING THAT BEARS YOUR SOCIAL SECURITY NUMBER OR FINANCIAL ACCOUNT NUMBER	
03	STATUS Check applicable box or boxes, more than one box may be marked.	_
	A Candidate (including write-in) C Public Official (Current) D Public Employee (Current) E Check this box if you are filling as a solicitor box if you are filling as a solicitor box if you are filling as a solicitor an original fill	
04	PUBLIC OFFICE OR PUBLIC EMPLOYMENT (i.e. administrator, member, Commissioner, job title, etc.) seeking hold held	_
Α	TOWNSHIPSUPERVISUR	7
	seeking hold beld	
В	AUDITORGENERAL	
 05	GOVERNMENTAL BODY in which you are/were an Official, Employee, Candidate or Nominee (e.g., dept, agency, authority, borough; board, commission, county, school district, twp,	 _etc \
A	USCEDLATOWNSHIP	
В	PENNSYLVANIA	
06	OCCUPATION OR PROFESSION (This may be the same as block 4) 07 YEAR SEE INSTRUCTIONS	_
\mathcal{C}	hristian School Principal Information in blocks 8-15 represents disclosure for the calendar year listed here: 2 0 2 3	
08	REAL ESTATE INTERESTS involved in transactions with the commonwealth, any of its agencies, or a political subdivision If NONE, check this box	X
09	CREDITORS TO WHOM IS OWED MORE THAN \$6,500	又
	Name: Address: Interest Rate	
10	DIRECT OR INDIRECT SOURCES OF INCOME OF \$1,300 OR MORE, including (but not limited to) all employment If NONE, check this box	$\overline{}$
10	Wesley Academy 117 Coates Avenue, Elkland, PA 16520 (OFFICIAL LISE ONLY)	
	Name: U.S. Army - retired Address: Ft Ben Harrison, IN	
11	GIFTS VALUED AT \$250 OR MORE IN THE AGGREGATE 106 S. Tuscarura, Usceola, PA 16942 If NONE, check this box	$\overline{\mathbf{X}}$
l	Source of Gift Value of Gift	7
ļ	Address of Source of Gift Circumstances (including description) of Gift	١
12	TRANSPORTATION, LODGING OR HOSPITALITY WHERE ACTUAL EXPENSES EXCEEDED \$650 IN THE AGGREGATE Source (Name and Address) If NONE, check this box Value	×
13	OFFICE, DIRECTORSHIP OR EMPLOYMENT IN ANY BUSINESS If NONE, check this box	
	Business Entity (Name and Address) Chairman, Cuates Heritage House + Museum III E Main St. Elkland, PA 16920 Board Member, Tinga County Housing Authority Mansfield, PA 16933 Position Held (i.e., officer, direct employee, etc.)	tor,
14	FINANCIAL INTEREST IN ANY LEGAL ENTITY IN BUSINESS FOR PROPIT If NONE, check this box	K
	Business (Name and Address) Interest Held (i.e., 5%, 10%, etc.)	z.)

The undersigned hereby affirms that the foregoing information is true and correct to the best of said person's knowledge, information and belief, said affirmation being made subject to the penalties prescribed by 18 Pa.C.S. §4904 (unsworn falsification to authorities) and the Public Official and Employee Ethics Act, 65 Pa.C.S. §1109(b). as Enter Current Date 31 July 2124

BUSINESS INTERESTS TRANSFERRED TO IMMEDIATE FAMILY MEMBER

15

Business (Name and Address)

Transferee (Name and Address)

Signature.

If NONE, check this box

Interest Held Relationship Date Transferred

THIS FORM IS CONSIDERED DEFICIENT IF ANY BLOCK ABOVE IS NOT COMPLETED. MAKE A COPY FOR YOUR RECORDS.

WHO MUST FILE, WHERE TO FILE, AND WHEN TO FILE

	WHO MUST FILE	ORIGINAL COPY	ADDITIONAL FILINGS*	WHEN TO FILE
A .	STATUS BLOCK A - CANDIDATES Statewide State Senate State House Supreme Court Superior Court Common Pleas Court Traffic Court Municipal Court Commonwealth Court	State Ethics Commission	Append to nomination petition when filed with the State Bureau of Elections 210 North Offlice Building Harrisburg, PA 17120-0029	ON OR BEFORE THE LAST DAY
	Constables / Deputy Constables	State Ethics Commission		FOR FILING
	Countywide City Borough Township Municipality (home rule charter)	File with the Clerk/ Secretary in the Municipality in which you are a candidate	Append to nomination petition when filed	A PETITION TO APPEAR ON THE BALLOT FOR ELECTION
	Magisterial District Judges	File with the County in which the Magisterial District is located	with County Board of Elections	
	School Director	File in the School District where you are a candidate		·
	Announced Write-in	For state office file with		Within 30 days of official certification of having been nominated or elected
	Unannounced Write-in Winners of Nominations	State Ethics Commission. For county or local office file with governing authority	No additional copy required	unless such person declines the nomination or office
	Unannounced Write-in Winners of Elections	of political subdivision.	,,,	within that time frame.
В.	STATUS BLOCK B - NOMINEE State Level	State Ethics Commission	File with the Official or Body vested with the power of	10 days before official or body approves or rejects
	County/Local Level	Governing authority of political subdivision	confirmation	the nomination.
C.	STATUS BLOCK C - PUBLIC OFFICIAL Commonwealth Public Officials such as: Members of Boards and Commissions (including alternates/designees); Heads of executive, legislative and independent agencies, boards and commissions; and persons appointed to positions designated as offices.	State Ethics Commission	File with <u>each</u> Agency, Board, Commission, Department, or Government Body in which employed or to which appointed. (make additional copies if needed)	
	State House Member State Senate Member	State Ethics Commission	File with the House Chief Clerk or Senate Secretary (whichever applies)	-
	Local Public Officials serving in/as: Counties; Boroughs; Townships; Home Rule Municipalities; Municipal Authorities; School Districts Incumbent Judges and Magisterial District Judges who are not candidates file a Statement of Financial Interests for Judicial Officers with the Administrative Office of Pennsylvania Courts (AOPC).	File only with the governing authority of the respective local political subdivision	Additional copy is not required to be filed (unless serving in multiple capacities, then file with <u>each</u> entity as required)	FILE NO LATER THAN MAY 1 OF EACH YEAR A POSITION IS HELD AND OF THE YEAR
	Constables / Deputy Constables	State Ethics Commission		AFTER LEAVING SUCH
D.	STATUS BLOCK D - PUBLIC EMPLOYEE Commonwealth PUBLIC EMPLOYEE (Executive, Leg. & Independent Agencies)	File only with your Employer		A POSITION.
	County City Borough Township Municipal (home rule) Municipal Authority School District	File only with your political subdivision	No additional copy required	
E.	STATUS BLOCK E - SOLICITOR	File with the governing authority of each political subdivision for which you are Solicitor	Additional copy is not required to be filed (unless serving in multiple capacities, then file with <u>each</u> entity as required)	

^{*} FILER IS RESPONSIBLE FOR MAKING ANY ADDITIONAL COPIES.

COMMONWEALTH OF PENNSYLVANIA

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF STATE

Bureau of Elections



POLITICAL BODY CANDIDATE'S AFFIDAVIT

COUNTY OF ERIE
 JUSTIN
 LUKE

 First Name
 Middle Name or Initial
 Name: MAGILL Suffix Last Name 38th Street 4541 West Residential Address: State: <u>PA</u> Zip Code: <u>16506</u> ERTE Municipality (City, Boro, or Township): MILLCREEK Gender: F ☑ M ☐ NB ☐ Mailing Address (if different from residential): State: Zip Code: MILLCREEK 3 Election District of Candidate (district where registered to vote): Office for which you are seeking nomination:

ATTORNEY GENERAL

Email address:

jmagill @ magill-law 821. com

Name as it is to appear on the Ballot:

JUSTIN L. MAGILL CANDIDATE'S AFFIDAVIT - 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 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 my name has not been presented as a candidate by nomination petitions for any public office to be voted for at the ensuing primary election, nor have I been nominated by any other nomination papers for any such office; that if I am a candidate for election at a general or municipal election I shall not be a registered and enrolled member of a political party at any time during the period of thirty (30) days prior to the primary up to and including the day of the following general or municipal election, or if I am a candidate for election at a special election I am not a registered and enrolled member of a political party; that I am not a candidate for an office which Lalready hold, the term of which is not set to expire in the same year as the office subject to this affidavit. I swear (or affirm) to the above parts as required Sworn (or affirmed) and subscribed before me this by the laws applicable to the office I seek. Signature of Candidate Signature of Officer Administering Affirmation 814-964-1052 Official Title Telephone Number ERIE My commission expires County of Residence OFFICE USE ONLY 200,00 COUNTY CODE AMOUNT RECEIVED 5 7 POLITICAL **OFFICE** DISTRICT NUMBER OF PARTY **PAPERS** COMMENTS VERIFY CHECKER INPUT B.F.

.

.

in the second



Bureau of Elections 717-787-5280

CANDIDATE DECLARATION to be attached to CANDIDATE'S AFFIDAVIT where notarized statement is not available

CANDIDATE DECLARATION - I declare that my residence, my election district and the title of the office for which I desire to be a candidate are as contained in the attached document, 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 the accompanying affidavit.

I declare under penalty of perjury under the law of the Commonwealth of Pennsylvania that the foregoing is true and correct.

Signed on the 31st (date) day of July (month), 2024	(year), at	
Erie, PA (county or other location, and state), USA	(country).	;
Justin Magill		202
(printed name)		
Spund Maji		1
(signaturé)	And the second s	
		<u>ယု</u> ား

(rev. 2/21)

74.4				
			,	
		÷		
		•		
		•		

COMMONWEALTH OF PENNSYLVANIA SEC-1 (Rev. 01/24)		FINANCIAL INTEREST	(717	SYLVANIA STATE ETHICS COMMISSIC 7) 783-1610 • TOLL FREE 1-800-932-09
01 LAST NAME		FIRST NAME		MI SUFFIX
MAGILL		JUSTIN	ı I I	L L
02 ADDRESS office (business or governmenta 2820 W. 23RD ST., STE100	l) or home City ERIE	SI P <i>P</i>	tate Zip Code A 16506	Area Code Phone (814) 461-6414
NOTE: IF YOU ARE INCLUDING ATTACHMENTS,	DO NOT INCLUDE ANYTHING	THAT BEARS YOUR SOCIAL SECURI	TY NUMBER OR FINA	NCIAL ACCOUNT NUMBERS.
03 STATUS Check applicable box or boxes, mo		-	- M	Check this box if you
	Public Official (Current) Dublic Official (Former)	D Public Employee (Current) D Public Employee (Former)	E	ling are amending
04 PUBLIC OFFICE OR PUBLIC EMPLOYMENT		Commissioner, job title, etc.) seeki		
A A T T O R N E Y	G E N E R	A L		
		seeki	na hole	d Ineld
В ;				
05 GOVERNMENTAL BODY in which you are/were	an Official Employee Candidate	or Nominee (e.g., dept. agency, authority b	porough board commis	sion county-school district two etc.)
Α				The state of the s
В				
06 OCCUPATION OR PROFESSION (This may be ATTORNEY	e the same as block 4)	07 YEAR SEE INSTRUCTION Information in blocks 8-15 re	presents 2	0 2 3
		disclosure for the calendar ye	ar listed here.	
08 REAL ESTATE INTERESTS involved in trans	actions with the commonweal	th, any of its agencies, or a political s	ubdivision	If NONE, check this box
				If NONE, check this box
09 CREDITORS TO WHOM IS OWED MORE THA		10 Rox 3809	61	Interest Rate
Name.		Bloomination, MN 5	5438	5.598 , 9.498
10 DIRECT OR INDIRECT SOURCES OF INCOM	E OF \$1,300 OR MORE, includin			If NONE, check this box
Name: MAGILL LAW L	H	2820 W 730	St.	(OFFICIAL USE ONLY)
Name: MATLL CAW C	Add	ess: 2820 W. 23rd Erie, PA 1650	26	
11 GIFTS VALUED AT \$250 OR MORE IN THE A	···	E110,811 1000		If NONE, check this box
Source of Gift			-	Value of Gift
Address of Source of Gift		Circumstances (in	cluding description) of Gif	t
12 TRANSPORTATION, LODGING OR HOSPITA	ALITY WHERE ACTUAL EXPE	NSES EXCEEDED \$650 IN THE AGGR	REGATE	If NONE, check this box
Source (Name and Address)				Value
13 OFFICE, DIRECTORSHIP OR EMPLOYMENT Business Entity (Name and Address)	IN ANY BUSINESS			If NONE, check this box Position Held (i.e., officer, director,
				employee, etc.)
14 FINANCIAL INTEREST IN ANY LEGAL ENTIT Business (Name and Address)	Y IN BUSINESS FOR PROFIT			If NONE, check this box
MAGILL LAW LTD., 2820	0 W. 23RD ST.	, ERIE, PA 16506		Interest Held (i.e., 5%, 10%, etc.)
15 BUSINESS INTERESTS TRANSFERRED TO Business (Name and Address)	IMMEDIATE FAMILY MEMBER		Interest He Relationshi	
Transferee (Name and Address)			Date Trans	

Enter Current Date_ Signature. THIS FORM INCONSIDERED DEFICIENT IF ANY BLOCK ABOVE IS NOT COMPLETED. MAKE A COPY FOR YOUR RECORDS.

SIGN THE FORM USING CURRENT DATE. DO NOT BACK DATE SIGNATURE.

The undersigned hereby affirms that the foregoing information is true and correct to the best of said person's knowledge, information and belief, said affirmation being made subject to the penalties prescribed by 18 Pa.C.S. 4904 (unsworn falsification to authorities) and the Public Official and Employee Ethics Act, 65 Pa.C.S. §1109(b).



DISCOVER BANK

28.24%

PO BOX 30939

SALT LAKE CITY, UT 84130-0939

(800) 347-7000

SYNCB/CARE CREDIT 32.99%

PO Box 71757

Philadelphia, PA 19176-1757

(866) 396-8254

UPGRADE INC

12.01%

275 BATTERY ST 22ND FL

SAN FRANCISCO, CA 94111-3305

(855) 997-3100

ALLY FINANCIAL

5.59% & 9.49%

PO Box 380901

Bloomington, MN 55438-0901

(800) 200-4622

DEPT OF ED

3.40-7.90%

121 S 13th St

Lincoln, NE 68508-1904

(888) 486-4722

			ı		
		× · ·			
,					
				•	

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF STATE Bureau of Elections



POLITICAL BODY CANDIDATE'S AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF Clario N		
Name: Selker, Bernock,	Middle Name or Initial	Suffix
Residential Address: 875 In white Rec	Man Man of Man	· · · · · · · · · · · · · · · · · · ·
City: Sige State: Re	Zip Code: <i>V</i>	2
Municipality (City, Boro, or Township): Millcreet Tup,	Gender: F □	M 🕱 NB □
Mailing Address (if different from residential):		<u> </u>
City: State:	Zip Code:	
Election District of Candidate (district where registered to vote):		creekTw
Office for which you are seeking nomination: US Sewate O	f Pai	· · · · · · · · · · · · · · · · · · ·
Email address: hmselkerir a gmail con	1	
practices in connection therewith; that I am aware of the provisions of Section 10 requiring pre-election and post-election reporting of campaign contributions and e presented as a candidate by nomination petitions for any public office to be voted have I been nominated by any other nomination papers for any such office; that if I	xpenditures; that my name for at the ensuing primary	has not been election, nor
thirty (30) days prior to the primary up to and including the day of the following a candidate for election at a special election I am not a registered and enrolled me a candidate for an office which I already hold, the term of which is not set to expit to this affidavit. I swear (of Sworn (or affirmed) and subscribed before me this by the law	I party at any time during t general or municipal election ember of a political party; t	the period of on, or if I am that I am not office subject as required
	I party at any time during to general or municipal election ember of a political party; to re in the same year as the over affirm) to the above parts	the period of on, or if I am that I am not office subject as required
thirty (30) days prior to the primary up to and including the day of the following a candidate for election at a special election I am not a registered and enrolled me a candidate for an office which I already hold, the term of which is not set to expit to this affidavit. I swear (of Sworn (or affirmed) and subscribed before me this by the law	I party at any time during to general or municipal election ember of a political party; to re in the same year as the over affirm) to the above parts	the period of on, or if I am that I am not office subject as required
thirty (30) days prior to the primary up to and including the day of the following a candidate for election at a special election I am not a registered and enrolled me a candidate for an office which I already hold, the term of which is not set to expit to this affidavit. I swear (or affirmed) and subscribed before me this by the law day of	l party at any time during to general or municipal election ember of a political party; to the in the same year as the or affirm) to the above party applicable to the office of the signature of Candidate	the period of on, or if I am that I am not office subject as as required I seek.
thirty (30) days prior to the primary up to and including the day of the following a candidate for election at a special election I am not a registered and enrolled me a candidate for an office which I already hold, the term of which is not set to expit to this affidavit. Sworn (or affirmed) and subscribed before me this by the law	l party at any time during the general or municipal elections of a political party; the in the same year as the or affirm) to the above particles applicable to the office of the signature of Candidate and the same year as the or affirm) and the same year as the or affirm) to the above particles applicable to the office of the signature of Candidate and the signature of	the period of on, or if I am that I am not office subject as as required I seek.
thirty (30) days prior to the primary up to and including the day of the following a candidate for election at a special election I am not a registered and enrolled me a candidate for an office which I already hold, the term of which is not set to expit to this affidavit. I swear (or affirmed) and subscribed before me this by the law day of	l party at any time during to general or municipal election ember of a political party; to the in the same year as the or affirm) to the above party applicable to the office of the signature of Candidate	the period of on, or if I am that I am not office subject as as required I seek.
thirty (30) days prior to the primary up to and including the day of the following a candidate for election at a special election I am not a registered and enrolled me a candidate for an office which I already hold, the term of which is not set to expit to this affidavit. Sworn (or affirmed) and subscribed before me this by the law	l party at any time during the general or municipal elections of a political party; the in the same year as the or affirm) to the above particles applicable to the office of the signature of Candidate and the same year as the or affirm) and the same year as the or affirm) to the above particles applicable to the office of the signature of Candidate and the signature of	the period of on, or if I am that I am not office subject as as required I seek.
thirty (30) days prior to the primary up to and including the day of the following a candidate for election at a special election I am not a registered and enrolled me a candidate for an office which I already hold, the term of which is not set to expit to this affidavit. I swear (content of the primary up to and including the day of the following and subscribed before me this to this affidavit. I swear (content of the primary up to and including the day of the following and the primary to the following and the primary up to and including the day of the following and the primary up to and including the day of the following and the primary up to and including the day of the following and the primary up to and including the day of the following and the primary up to and including the day of the following and the primary up to and including the day of the following and the primary up to and the primary up to an arrange of the primary up to a pri	l party at any time during the general or municipal elections of a political party; the in the same year as the or affirm) to the above particles applicable to the office of the signature of Candidate and the same year as the or affirm) and the same year as the or affirm) to the above particles applicable to the office of the signature of Candidate and the signature of	the period of on, or if I am that I am not office subject as as required I seek.

·



Bureau of Elections 717-787-5280

CANDIDATE DECLARATION to be attached to CANDIDATE'S AFFIDAVIT where notarized statement is not available

CANDIDATE DECLARATION - I declare that my residence, my election district and the title of the office for which I desire to be a candidate are as contained in the attached document, 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 the accompanying affidavit.

I declare under penalty of perjury under the law of the Commonwealth of Pennsylvania that the foregoing is true and correct.

Signed on the $\frac{29\%}{2024}$ (date) day of $\frac{3}{4}$ (month), $\frac{2024}{2024}$ (year), at	
Clarion, Pao (county or other location, and state), USA (country).	202
Bernard Selker	
(printed name)	-17
(signature)	မှာ ကွ

DSBE-PBCA (rev. 2/24)

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF STATE Bureau of Elections



POLITICAL BODY CANDIDATE'S AFFIDAVIT COMMONWEALTH OF PENNSYLVANIA COUNTY OF LANCASTER Suffix Residential Address: 1627 RINGEDALE ORIVE LANCISTER State: PA Zip Code: 17601 Municipality (City, Boro, or Township): MANHEIM TOWNSHIP Gender: F \(\text{Gender: F} \) M \(\text{M} \) NB \(\text{NB} \) Mailing Address (if different from residential): State: __Zip Code: __ Election District of Candidate (district where registered to vote): MANAEIM TOWNSHIP Office for which you are seeking nomination: Email address: TBBOWMANGE COMATL.COM Name as it is to appear on the Ballot: TROY BOWMAN CANDIDATE'S AFFIDAVIT - 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 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 my name has not been presented as a candidate by nomination petitions for any public office to be voted for at the ensuing primary election, nor have I been nominated by any other nomination papers for any such office; that if I am a candidate for election at a general or municipal election I shall not be a registered and enrolled member of a political party at any time during the period of thirty (30) days prior to the primary up to and including the day of the following general or municipal election, or if I am a candidate for election at a special election I am not a registered and enrolled member of a political party; that I am not a candidate for an office which I already hold, the term of which is not set to expire in the same year as the office subject to this affidavit. I swear (or affirm) to the above parts as required Sworn (or affirmed) and subscribed before me this by the laws applicable to the office I seek. 31 day of JULY 20 24 Signature of Candidate Signature of Officer Administering Affirmation 7)7-278-7422 Telephone Number Official Title LANCASTER My commission expires_ OFFICE USE ONLY 200.00 COUNTY CODE AMOUNT RECEIVED R E ς OFFICE POLITICAL NUMBER OF DISTRICT PARTY **PAPERS** COMMENTS

INPUT

VERIFY

B.F.

CHECKER



Bureau of Elections 717-787-5280

CANDIDATE DECLARATION to be attached to CANDIDATE'S AFFIDAVIT where notarized statement is not available

CANDIDATE DECLARATION - I declare that my residence, my election district and the title of the office for which I desire to be a candidate are as contained in the attached document, 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 the accompanying affidavit.

I declare under penalty of perjury under the law of the Commonwealth of Pennsylvania that the foregoing is true and correct.

Signed on the $3/37$ (date) day of $3/24$ (month), 202	24 (year), at
LANCASTER, PA (county or other location, and state), US	A (country).
TROY BOWMAN	
(printed name)	1 j
Trock	engeneral engeneral en Speka
(signature)	TO THE STATE OF TH

ſ	LACT	A RAE												EID	ST NAR	n=								8,51	QI I	FFIX
	LASTN	T	N/ N	T	1	T	T	T	1	T	T	T	7				Y		T	T	ſ	Γ	ТП	D	1	TEIA
_	ВО	W	M A	N	<u>L</u>	<u> </u>	<u> </u>		<u> </u>	<u> </u>		<u> </u>		T	R	<u>ol</u> .	<u> </u>		<u> </u>	<u> </u>	<u> </u>	<u></u>	Щ.		<u> </u>	
	ADDRES 1627 RID		•		gove	rnme	ntal)	or hor	me		ı	City LANC	ASTE	R				St PA	ate	Zip (1760	Code 1		\rea Cod (717		Pho -7422	ne
C	TE: IF YOU	JARE	NCLUDII	NG ATT	TACH	MENT	S, DO	тои с	INCL	UDE	ANYT	HING	THAT	BEARS	YOUR	soc	IAL S	ECURIT	Y NUN	IBER	OR FI	NAN	CIALAC	COUN	IUN TI	MBER
	STATUS	1	ck applic				more	\Box	one bo		-		d. D	Пь	ıblic Er	anlove	aa (Cı	urrent\	Εĺ	7.	heck t	hie h	.O.Y	b	heck tox if y	ou
	в	Nomi	•	adding	WINC	,	С		Public		•	,	D		ıblic Er		•	•		if	you a	re filiı	ng		re ame n origi	
	PUBLIC	OFFICE	OR PU	BLIC E	MPLC	YME	NT	(i.e.	admini	istrato	or mei	mber.	Comm	issione	iob tit	e. etc	2)	seeki	na			old		hel	d	
Γ							Ī	Ţ				Ī				1		1	Ň		\equiv		123	<u> </u>		1
L		<u> </u>					L	<u> </u>	<u>. i</u>	<u> </u>	<u> </u>	L						seeki	LI			nold		hel	7 3	
ſ		<u> </u>	1				Ι	T		I	[Γ-						Seekii	'9 	-		ioiu	次 法		T	T:
L			L				<u> </u>	<u> </u>	<u></u>	L	<u> </u>	<u> </u>				Щ		L	ll	. j			1 1		<u> </u>	
	GOVERN	MENTA	L BODY	in whi	ch you	are/w	rere a	n Offici	ial, Em	ploye	e, Can	didate	or Nor	ninee (e	g., dep	, agen	псу, аг	thority, b	orough	board	l, comi	missio	7		ol distri	ct, twp
											<u> </u>	<u></u>													- 10 z	
																					1			. CH	詳	
	REAL ES	TATE	NTERES		/ \ olved		ansac	tions	with t	the co	mmo	nweal	th, an	dis v of its	agenc	ies, o	ra po	olitical s	ubdivi	sion			If NONE	chec	k this	box
	CREDITO	ORS TO	WHOM	TS inv	olved	I in tra	THAN	1 \$6,50			·	-	ress:		agenc	ies, o	rapo	olitical s	ubdivi	sion			If NONE	, chec		
	CREDITO	ORS TO	WHOM M MORT	IS OW	eD M	ORE FINA	THAN	1 \$6,5 0	DRD C	RED	<u>ir</u>	Add	ress:	y of its			-	-	ubdivi	sion	-	 [If NONE	, chec Rate	k this	box
	CREDITO	ORS TO	WHOM M MORT	IS OW	eD M	ORE FINA	THAN	1 \$6,5 0	DRD C	RED	<u>ir</u>	. Add	ress:	y of its	ed to) a	l emp	loyme	ent					If NONE	, chec	k this	box
	CREDITO	DRS TO	WHOM M MORT	IS OW GAGE	ED M	ORE FINA	THAN	1 \$6,5 0	DRD C	RED	<u>ir</u>	Add ncludir	ress:	y of its	ed to) al	lemp	oloymo	ent WYON	11551	NG	PA		If NONE	, chec	k this	box
	CREDITO	DRS TO	WHOM M MORT RECT S	IS OW GAGE	ED M	ORE FINA	THAN	1 \$6,5 0	DRD C	RED	<u>ir</u>	Add ncludir	ress:	y of its	ed to) al	lemp	oloymo	ent	11551	NG	PA		If NONE	, chec	k this	box
	CREDITO	DRS TO EEDON DR IND HE LC /ERS	WHOM M MORT RECT S OMIS OUTL	IS OW GAGE OURCI COM	ED M	ORE FINA	THAN NCIA	I \$6,50 AL, FO OF \$1	,300 C	RED	<u>ir</u>	Add ncludir	ress:	y of its	ed to) al	lemp	oloymo	ent WYON	11551	NG	PA		If NONE	, check Rate , check AL USI	k this	box box Y)
	CREDITO Name: FR DIRECT O Name: Th BREW	DRS TO EEDON DR IND HE LC /ERS	WHOM M MORT RECT S OMIS OUTL	IS OW GAGE OURCI COM	ED M	ORE FINA	THAN NCIA	I \$6,50 AL, FO OF \$1	,300 C	RED	<u>ir</u>	Add ncludir	ress:	y of its	ed to) al	lemp	oloymo	ent WYON	11551	NG	PA		If NONE Interest If NONE	, check Rate , check AL USI	k this	box box Y)
	CREDITO Name: FR DIRECT O Name: Th BREW	DRS TO	WHOM M MORT RECT S OOMIS OUTL AT \$250	IS OW GAGE OURCI COM	ED M	ORE FINA	THAN NCIA	I \$6,50 AL, FO OF \$1	,300 C	RED	<u>ir</u>	Add ncludir	ress:	y of its	ed to) al	Iemp RKR E, L	RD, \	ent WYON	IISSI R P	NG A			If NONE Interest If NONE	, check Rate , check AL USI	k this	box box Y)
	CREDITO Name: FR DIRECT O Name: Th BREW GIFTS W Source of	DRS TO	RECT SOOMIS OUTL AT \$250	IS OW GAGE OURCI CON ET	ED M. ES OF	ORE FINA	THAN NCIA	# \$6,50 OF \$1	,300 C	DR MC	DRE, ii	Addin	ng (but	not limit	ed to) al	I emp	aloymo	ent WYON CASTE	IIISSI ER PA	NG A		I I	If NONE Interest If NONE (OFFICIAL Value	check	k this	box box Y)
	CREDITO Name: FR DIRECT O Name: Th BREW GIFTS W. Source of	DRS TO EEDON DR IND: HE LC /ERS ALUED Gift Gource of	WHOM M MORT RECT S OMIS OUTL AT \$250 Gift	IS OW GAGE OURCI CON ET	ED M. ES OF	ORE FINA	THAN NCIA	# \$6,50 OF \$1	,300 C	DR MC	DRE, ii	Addin	ng (but	not limit	ed to) al	I emp	aloymo	ent WYON CASTE	IIISSI ER PA	NG A		I I	If NONE Interest If NONE (OFFICIAL If NONE Value	check	k this	box box Y)
	CREDITO Name: FR DIRECT O Name: Th BREW GIFTS W. Source of	DRS TO EEDON DR IND: HE LC /ERS ALUED Gift Gource of	WHOM M MORT RECT S OMIS OUTL AT \$250 Gift	IS OW GAGE OURCI CON ET	ED M. ES OF	ORE FINA	THAN NCIA	# \$6,50 OF \$1	,300 C	DR MC	DRE, ii	Addin	ng (but	not limit	ed to) al	I emp	aloymo	ent WYON CASTE	IIISSI ER PA	NG A		f Gift	If NONE Interest If NONE (OFFICIA Value If NONE	check Rate Check C	k this ONL	box Y)
language of the same of the sa	CREDITO Name: FR DIRECT O Name: Th BREW GIFTS W. Source of	DRS TO EEDON INDICATE TO THE LC INDICATE TO THE LC INDICATE TO THE LC INDICATE TO THE INDICATE	WHOM MORT RECT S OMIS OUTL AT \$250 Gift TON, LO Address)	IS OW GAGE OURCI COM ET OR MO	ED M., EDI	ORE FINAL FI	DME (J \$6,50 AL, FC OF \$1	,300 C	DR MC	DRE, it	Addin	ng (but	not limit	ed to) al	I emp	aloymo	ent WYON CASTE	IIISSI ER PA	NG A		f Gift	If NONE Interest If NONE (OFFICIAL Value	check	k this ONL k this k this k this	box box box box
	CREDITO Name: FR DIRECT O Name: Th BREW GIFTS W Source of TRANSP Source (Na	DRS TO EEDON DR INDICATE TO THE LCC // ERS ALUED Gift ORTAT DIRECT DIREC	WHOM M MORT RECT S OMIS OUTL AT \$250 Gift TON, LO Address) TORSHII arrie and A	IS OW	ED M., EDI	ORE FINAL FI	DME (I \$6,50 AL, FC OF \$1 GREG	,300 C	DR MC	UAL 1	Add 11	ng (but	not limit	ed to) al	I emp	aloymo	ent WYON CASTE	IIISSI ER PA	NG A		f Gift	If NONE Interest If NONE (OFFICIA Value If NONE Position i	checi	k this K this ONL k this k this k this k this	box box box box box c, direct
	CREDITO Name: FR DIRECT O Name: Th BREW GIFTS W. Source of Address of S TRANSP Source (Na OFFICE, Business E	DRS TO EEDON DR INDICATE ALUED Gift ORTAT DIRECT CONTRACT (Name and ALINT) Name are assisted to the contract of the contract o	WHOM MORT RECT S OMIS OUTL AT \$250 Gift TON, LO Address) TORSHII ame and A EREST I d Address	IS OWNER OF TRANS	ED M ES OF	ORE FINAL FI	THAN NCIA	I \$6,50 AL, FC OF \$1 ITY W	,300 C	DR MC	UAL I	Adddin Adddin Adddin Adddin Adddin Adddin Adddin Adddin Adddin Addin Add	g (but	not limit	ed to) al	I emp	aloymo	ent WYON CASTE	IIISSI ER PA	NG A		Gift	If NONE Interest If NONE (OFFICIA Value If NONE Value If NONE If NONE If NONE Interest F	check	k this CONL k this k this	box box box box c, direct box 0%, etc

THIS FORM IS CONSIDERED DEFICIENT IF ANY BLOCK ABOVE IS NOT COMPLETED. MAKE A COPY FOR YOUR RECORDS.

SIGN THE FORM USING CURRENT DATE. DO NOT BACK DATE SIGNATURE.

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

In Re: Nomination Papers of Constitution Party, et al. : New Case

and in the manner(s) stated below, which service satisfies the requirements of Pa.R.A.P. 121:

:

:

PROOF OF SERVICE

I hereby certify that this 8th day of August, 2024, I have served the attached document(s) to the persons on the date(s)

Service

Served: Bowman, Troy

Service Method: Email

Email: goodrichenterprises@juno.com

Service Date: 8/8/2024

Address:

Representing: Respondent Bowman, Troy

Served: Clymer, James N

Service Method: Email

Email: goodrichenterprises@juno.com

Service Date: 8/8/2024

Address:

Representing: Respondent Clymer, James N

Served: Constitution Party

Service Method: Email

Email: goodrichenterprises@juno.com

Service Date: 8/8/2024

Address:

Representing: Respondent Constitution Party

Served: Goodrich, Alan R, Sr.

Service Method: Email

Email: goodrichenterprises@juno.com

Service Date: 8/8/2024

Address:

 $Representing: \qquad \qquad Respondent \quad Goodrich, \, Alan \, R \, , \, Sr.$

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

PROOF OF SERVICE

(Continued)

Served: Magill, Justin L

Service Method: Email

Email: goodrichenterprises@juno.com

Service Date: 8/8/2024

Address:

Representing: Respondent Magill, Justin L

Served: Selker, Bernard

Service Method: Email

Email: goodrichenterprises@juno.com

Service Date: 8/8/2024

Address:

Representing: Respondent Selker, Bernard

Served: Sylvester, Steven E

Service Method: Email

Email: goodrichenterprises@juno.com

Service Date: 8/8/2024

Address:

Representing: Respondent Sylvester, Steven E

/s/ Walter S. Zimolong, III

(Signature of Person Serving)

Person Serving: Zimolong, Walter S., III

Attorney Registration No: 089151

Law Firm:

Address: Po Box 552

Villanova, PA 19085

Representing: Petitioner Boop, Ashley