

NON-PRECEDENTIAL DECISION - SEE SUPERIOR COURT O.P. 65.37

COMMONWEALTH OF PENNSYLVANIA : IN THE SUPERIOR COURT OF
: PENNSYLVANIA

V.

KASHEEM ABDULLAH AIKEN

Appellant

: No. 1079 MDA 2025

Appeal from the Judgment of Sentence Entered July 9, 2025
In the Court of Common Pleas of Dauphin County Criminal Division at
No(s): CP-22-CR-0001747-2024

BEFORE: KUNSELMAN, J., LANE, J., and FORD ELLIOTT, P.J.E.*

MEMORANDUM BY LANE, J.:

FILED: OCTOBER 23, 2026

Kasheem Abdullah Aiken (“Aiken”) appeals from the judgment of sentence imposed following his jury convictions of possession with intent to manufacture a controlled substance¹ (“PWID”) and related drug offenses. After careful review, we reverse the convictions, vacate the judgment of sentence, and remand.

By way of background, we first note that Aiken had pending charges at three Dauphin County trial dockets, all related to Brianna Malseed (“Brianna”), the mother of his child.² At the first docket, the Commonwealth charged Aiken

* Retired Senior Judge assigned to the Superior Court.

¹ **See** 35 P.S. § 780-113(a)(30).

² At the time of the July 9, 2025 sentencing in this case, the other three dockets were “still pending.” N.T., 7/9/25, at 5-6.

with intimidation of a witness and related offenses, for allegedly threatening Brianna at a preliminary hearing “in an effort to get her to withhold or change her testimony.”³ N.T., 11/6/24, at 8, 10. The second docket involved a charge of simple assault against Brianna.⁴ At the third docket, the Commonwealth charged Aiken with discharging a firearm into an occupied structure, conspiracy, and related offenses, arising from “shootings between August” and October 2023, where he fired a gun into homes where he believed Brianna was present.⁵ ***Id.*** at 11.

The charges at the present docket, CP-22-CR-0001747-2024, prosecuted in Dauphin County, arose from a controlled drug purchase in Lehigh County. In October 2023, Aiken and Brianna checked into a motel room in or near Allentown. In the parking lot, Brianna made an exchange with a confidential informant cooperating with the Pennsylvania State Police. Brianna provided the state troopers with the motel room key. They entered the room, encountered Aiken, and discovered drugs and drug paraphernalia.⁶

A state trooper filed a police criminal complaint in Lehigh County, charging Aiken with the instant drug offenses. For reasons not apparent from

³ The trial docket number is CP-22-CR-0000961-2024.

⁴ The trial docket number is CP-22-CR-0000963-2024.

⁵ The trial docket number is CP-22-CR-0000967-2024.

⁶ According to Aiken, he was “picked up on” all four dockets on the same day. N.T., 1/7/25, at 7.

the record, the charges transferred to Dauphin County. Although the certified record transmitted on appeal does not include the preliminary hearing transcript, the parties agree that Aiken did **not** raise any challenge to venue prior to or at the preliminary hearing.⁷ **See** Aiken's Brief at 12; **see also** Commonwealth's Brief at 10. The magisterial district court bound the charges over to the Dauphin County Court of Common Pleas (the "trial court").

Although the trial court appointed counsel to represent Aiken, he has proceeded *pro se*, with an assistant public defender as stand-by counsel, through many of the proceedings. At this juncture, we note the trial docket does not include any docket entry for a written ruling on Aiken's venue and subject matter jurisdiction challenges. The parties, however, made statements on the record at several hearings. We recount the relevant procedural history in detail.

On November 6, 2024, the Honorable Deborah Curcillo conducted a **Grazier**⁸ hearing. All four Dauphin County trial dockets appear on the cover page of this transcript. The Commonwealth indicated, without explanation, that it would proceed to trial on the instant docket only, then scheduled for

⁷ Upon informal inquiry by this panel, the trial court has advised that it did not have the notes of testimony to the preliminary hearing.

⁸ **See Commonwealth v. Grazier**, 713 A.2d 81 (Pa. 1998) (requiring an on-the-record determination that a defendant waives their right to counsel knowingly, intelligently, and voluntarily).

early December. **See** N.T., 11/6/24, at 18. Aiken, acting *pro se*, argued: “[The instant] docket does not hold jurisdiction to Dauphin County because the charge was caught in Bethlehem [*sic*].” **Id.** The trial court advised Aiken to file a formal motion and stated it would address it “before trial.” **Id.** at 19-20. Aiken did not file a written motion at this time.

Next, on December 2, 2024, the Honorable Jeffrey Engle presided over a proceeding that was scheduled to be jury selection for the instant docket. Aiken, appearing *pro se*, raised an objection citing subject matter jurisdiction, without explanation. **See** N.T., 12/2/24, at 7. The transcript indicates the Commonwealth’s response as follows: “Your Honor has ruled of any [*sic*] of his venue objections and . . . it’s not proper that they be raised at all before the jury.” **Id.** at 10. In any event, Aiken then requested assistance of counsel, and the trial court orally appointed standby counsel, who was present, to represent him. Counsel requested a continuance, as he had prepared to act as standby counsel only. The trial court granted a continuance to late January 2025.

The following day, December 3, 2024, Aiken filed a *pro se* motion to quash the information, which did not object to venue or subject matter jurisdiction.⁹ On January 7, 2025, Judge Curcillo held a hearing on this motion. Aiken, addressing the court personally, argued that previously, he

⁹ This motion challenged the sufficiency of the evidence and the Commonwealth’s alleged failure to sign or approve the criminal information.

asked Judge Engle “for a motion to be heard before the trial, [but] he denied it.” N.T., 1/7/25, at 4. Aiken explained:

[I]t’s about subject matter jurisdiction. I asked him for the venue being as though the [instant docket] was never caught in this county, and it shouldn’t be charged in this county.

It would be a violation of my right for a case to be tried in a different jurisdiction. That was my main thing. . . .

Id. The Commonwealth responded:

It was ruled by Judge Engle, if I recall, it’s not jurisdiction because the Dauphin County Court of Common Pleas has state-wide jurisdiction. It’s the question of venue. The issue of venue has been waived [by Aiken’s failure to act].

Id. at 9. The discussion moved on to other matters without further discussion.

Next, Aiken filed a *pro se* motion to dismiss counsel, as well as a *pro se* “Memorandum and Motion to Dismiss for Lack of Subject Matter Jurisdiction.” Neither motion challenged venue or subject matter jurisdiction.¹⁰

On February 24, 2025, Judge Curcillo held a hearing on the motions. Relevantly, the court acknowledged Aiken’s “motions on venue,” but stated, “I believe Judge Engle had already ruled on that issue and ruled that venue has been waived.” N.T., 2/24/25, at 3-4. The trial court thus denied relief but noted Aiken’s objection for the record. The Commonwealth reiterated that

¹⁰ The motion to dismiss generally argued that: (1) the laws cited in the complaint had no “enacting clause” and were thus unconstitutional or unenforceable; and therefore (2) “since they are not laws of this state, the [trial court] has no subject matter jurisdiction, as there can be no crime [for] failing to follow laws[] which do not constitutionally exist.” Memorandum and Motion to Dismiss for Lack of Subject Matter Jurisdiction, 1/21/25, at 22.

it would proceed to trial first only on the instant docket. **See id.** at 8. At this time, it explained: “Given the factual nature of the other charges, . . . with our desire to not revictimize the witness[, Brianna], she will be produced for trial when those cases come to trial.” **Id.**

The instant case proceeded to a jury trial in April 2025 before Judge Curcillo.¹¹ Brianna testified as a Commonwealth witness and denied having knowledge that drugs were present during the underlying drug purchase. The Commonwealth did not charge her in connection with this case. **See** N.T., 4/8-9/25, at 71. Aiken, proceeding *pro se*, testified on his own behalf. The jury found him guilty of all charges: two counts each of PWID — fentanyl and methamphetamine — and possession of a controlled substance, and one count of possession of drug paraphernalia.¹²

On July 9, 2025, the trial court imposed an aggregate sentence of eleven to twenty-two years’ imprisonment. Again, Aiken argued he could not be “guilty for a crime that never occurred in [this] jurisdiction,” and cited venue. N.T., 7/9/25, at 9. At this time, Aiken’s three other Dauphin County criminal dockets remained “pending.” **Id.** at 5-6. At Aiken’s request, the trial court appointed counsel.

¹¹ Aiken again orally raised the issue of “jurisdiction” at *voir dire*, arguing that he was not arrested or charged in Dauphin County. **See** N.T., 3/31/25, at 3. The trial court noted his argument for the record. **See id.** at 5.

¹² **See** 35 P.S. § 780-113(a)(16), (32).

Aiken filed a timely counseled notice of appeal, and a court-ordered Pa.R.A.P. 1925(b) statement of errors complained of on appeal.¹³ The trial court has filed a Rule 1925(a) opinion, suggesting that Aiken has preserved a venue issue for appeal, and that venue in Dauphin County was **not** proper.

Aiken presents one issue for our review: “Did the court err in denying the motion to dismiss due to improper venue when the case had no facts involving [D]auphin County, and there is no record indicating that Dauphin County was the proper venue for a case occurring in [Lehigh] County?” Aiken’s Brief at 4.

This Court has explained:

Jurisdiction relates to the court’s power to hear and decide the controversy presented. All courts of common pleas have statewide subject matter jurisdiction in cases arising under the Crimes Code. . . .

Venue, on the other hand, refers to the convenience and locality of trial, or the right of a party to have the controversy brought and heard in a particular judicial district. . . . ***Venue in a criminal action properly belongs in the place where the crime occurred.***

. . . Venue challenges concerning the locality of a crime . . . stem from the Sixth Amendment to the United States Constitution and Article I, § 9 of the Pennsylvania Constitution, both of which ***require that a criminal defendant stand trial in the county in which the crime was committed***, protecting the accused from unfair prosecutorial forum shopping.[□] . . .

¹³ Initially, Aiken filed two *pro se* notices of appeal: (1) one after trial but before sentencing; and (2) one after sentencing. This Court quashed the former appeal and discontinued the latter. Ultimately, appointed counsel filed a timely notice of appeal.

Commonwealth v. Callen, 198 A.3d 1149, 1157-58 (Pa. Super. 2018) (paragraph break and emphases added and footnote and citation omitted). The Commonwealth bears “the burden of proving venue is proper.” ***Id.*** at 1158 (citation omitted).

Pennsylvania Rule of Criminal Procedure 130, “Venue; Transfer of Proceedings,” provides:

(A) Venue. ***All criminal proceedings in . . . court cases shall be brought before the issuing authority for the magisterial district in which the offense is alleged to have occurred . . .***, subject, however, to the following exceptions:

(1) A criminal proceeding may be brought before any issuing authority of ***any magisterial district within the judicial district*** whenever the particular place within the judicial district in which the offense is alleged to have occurred is unknown.

(2) When charges arising from the same criminal episode occur in more than one magisterial district within the same judicial district, the criminal proceeding on all the charges should be brought before one issuing authority in any one of the magisterial districts in which the charges arising from the same criminal episode occurred.

Pa.R.Crim.P. 130(A)(1)-(2) (emphases added).

Rule 134, “Objections to Venue,” provides in pertinent part:

(A) ***Objections to venue between magisterial districts*** shall be raised in the court of common pleas of the judicial district in which the proceeding has been brought, ***before completion of the preliminary hearing*** in a court case . . . , or such objections shall be deemed to have been waived.

Pa.R.Crim.P. 134(A) (emphases added).

Rule 578, "Omnibus Pretrial Motion for Relief," falls under a latter chapter within the rules. This rule generally requires "all pretrial requests for relief [to] be included in one omnibus motion." Pa.R.Crim.P. 578. The comment includes "change of venue" as an appropriate request for relief. Pa.R.Crim.P. 578, *comment*. The comment further provides that "the earliest feasible submissions and rulings on such motions are encouraged." ***Id.*** (unnecessary capitalization omitted).

This Court has interpreted the above rules as follows:

[T]he general rule is that "[v]enue in a criminal action properly belongs in the place where the crime occurred." Pa.R.Crim.P. 130(A). Nevertheless, some exceptions to this general rule exist, one of which is:

When charges arising from the same criminal episode occur in more than one judicial district, the criminal proceeding on all the charges may be brought before one issuing authority in a magisterial district within any of the judicial districts in which the charges arising from the same criminal episode occurred.

Pa.R.Crim.P. 130(A)(3); ***see also*** Pa.R.Crim.P. 555^[14] . . .

¹⁴ Rule 555(A) states:

(A) In all cases in which ***charges arising from a single criminal episode*** occur in more than one judicial district:

(1) If the charges are filed in more than one judicial district, ***at any time after the case is held for court, the proceedings may be transferred*** to one of the judicial districts.

(2) If all the charges are filed in one judicial district, ***at any time after the case is held for court, the***

(Footnote Continued Next Page)

The “single criminal episode” test originates from Pennsylvania’s compulsory joinder statute. **See** 18 Pa.C.S.A. § 110(1)(ii)[.] As we have held:

. . . If a number of charges are logically or temporally related and share common issues of law and fact, a single criminal episode exists. When we ascertain whether a number of statutory offenses are “logically related” to one another, the court should initially inquire as to whether there is a substantial duplication of factual, and/or legal issues presented by the offenses. . . .

Callen, 198 A.3d. at 1160 (footnote and some citations omitted).

In **Commonwealth v. Succì**, 173 A.3d 269 (Pa. Super. 2017), the Commonwealth charged the defendant in Bucks County with home improvement fraud and related offenses, for conduct committed in Bucks County, Philadelphia, and New Jersey. **See id.** at 271-78. In a pretrial omnibus motion, the defendant unsuccessfully sought dismissal of the counts arising in Philadelphia. **See id.** at 283. After the jury found him guilty, the defendant appealed to this Court and argued, *inter alia*, that the Bucks County Court of Common Pleas was an improper venue for some of the crimes committed in Philadelphia and New Jersey. **See id.** at 279. This Court held that defendant waived his arguments concerning the New Jersey-related charges for failure to include them in his pretrial motion. **See id.** at 283-84.

proceedings may be transferred to another one of the judicial districts.

Pa.R.Crim.P. 555(A)(1)-(2) (emphasis added).

Here, Aiken avers that the trial court erred in denying relief on his venue challenge. In support, Aiken first argues that he timely objected. He observes that while “the record is somewhat unclear, . . . the basis of Judge Engle’s” denial of relief was procedural — that he objected to venue after the preliminary hearing. Aiken’s Brief at 12. Aiken maintains that Rules of Criminal Procedure 130 and 134 apply to venue challenges “between the magisterial districts” only. ***Id.*** at 18 (emphasis omitted). Aiken contends these rules are silent on, and thus do not limit, challenges to “venue as it relates to the court of common pleas.” ***Id.*** Meanwhile, Aiken asserts, Rules 578 and 584 specifically permit a venue challenge in the court of common pleas *via* a pretrial motion. On the merits, Aiken asserts that the Commonwealth bore the burden of establishing venue and here, it “did not advocate that venue was proper in [this] case.” ***Id.*** at 26. Aiken reiterates that the crime occurred in Lehigh County and involved “no criminal acts in Dauphin County.” ***Id.*** at 28.

The Commonwealth responds that Aiken has waived a challenge to venue. First, it avers that Aiken objected only to the trial court’s subject matter jurisdiction and not to venue, which is a distinct issue. Additionally, citing Rule 134(A), the Commonwealth insists that “a challenge to venue must be raised in the court of common pleas prior to the completion of the end of

the preliminary hearing.”¹⁵ Commonwealth’s Brief at 9. **See** *Commonwealth v. Morales*, 80 A.3d 1177, 1179 (Pa. 2013) (applying Pa.R.A.P. 302(a) to hold the defendant appellee waived an issue for failure to raise it before the trial court).

In its Rule 1925(a) opinion, the trial court explained that Aiken’s venue “challenge was previously denied by [Judge] Engle, and [the] court declined to revisit the issue.” Trial Court Opinion, 10/6/25, at 2 (unnecessary capitalization omitted). The court suggested, however, that Aiken is entitled to relief. It first found that he timely objected, as he raised the issue “several times” before trial. *Id.* at 4. On the merits, the court found, pursuant to Rule 555, that the underlying charges did **not** “constitute[] a single criminal episode that occurred across multiple counties.” *Id.* Additionally, while Aiken

¹⁵ On appeal, the Commonwealth also avers that “Rule 584 is not related to whether pertinent acts occurred within the county.” Commonwealth’s Brief at 13. Instead, “Rule 584 motions require proof that a fair and impartial jury trial cannot be held in that county,” and here, Aiken did not raise any such “fair and impartial” claim. *Id.* Additionally, the Commonwealth contends that: (1) the instant case and Aiken’s other three Dauphin County dockets have “similar related conduct,” as Brianna was a victim or witness in all; (2) Aiken did not live in Lehigh County, but rather Franklin County, and “his residence was closer to Dauphin County than” Lehigh County; and (3) and “consolidation of those dockets in a single county benefited both parties.” *Id.* at 10-11 (unnecessary capitalization omitted).

The record does not indicate that the Commonwealth raised these arguments before the trial court, and the Commonwealth does not claim on appeal that it did. Accordingly, we do not consider them. **See** Pa.R.A.P. 302(a) (providing that “[i]ssues not raised in the trial court are waived and cannot be raised for the first time on appeal”).

had “several active dockets” in Dauphin County, “the instant docket was tried separately.” **Id.** Finally, the court noted there was no “documentation filed by the Commonwealth that demonstrate[d] a mutual transfer between Lehigh County and Dauphin County.” **Id.**

After careful review of the record, we determine Aiken is entitled to relief. We first determine that he timely objected to venue. We disagree with the Commonwealth’s conclusion that Rule 134(A) requires all venue challenges “must be raised in the court of common pleas prior to the completion of the end of the preliminary hearing.” Commonwealth’s Brief at 9-10 (*citing* Pa.R.Crim.P. 134(A)). The Commonwealth ignores the plain language of the earlier portion of the same rule — “objections to venue **between magisterial districts**.”¹⁶ Pa.R.Crim.P. 134(A) (emphasis added and unnecessary capitalization omitted). **See also Commonwealth v. Davis**, 242 A.3d 923, 931 (Pa. 2020) (stating that: (1) statutory interpretation is a question of law, and our standard of review is *de novo*; (2) the plain language of rule is the best indication of its intent; and (3) “[w]hen the words of a statute are clear and free from all ambiguity, the letter of it is not to be disregarded under the pretext of pursuing its spirit”). Meanwhile, as Aiken points out, Rule 134(A) is silent as to venue between judicial districts,

¹⁶ The other two subsections of Rule 134 also refer to an “objection to venue **between magisterial districts**” and “improper venue **between magisterial districts**.” Pa.R.Crim.P. 134(B)-(C) (emphases added).

or the courts of common pleas. Thus, we determine Rule 134(A), by its own language, applies to a venue challenge before a particular magisterial district within a judicial district.

Meanwhile, we agree with Aiken that Rule 578, which falls under a different chapter than Rules 130 and 134,¹⁷ specifically allows a venue challenge, post-preliminary hearing, in an omnibus pretrial motion. **See** Pa.R.Crim.P. 578 & *comment* (providing that a “change of venue” is an “appropriate” request for relief in an omnibus pretrial motion). **See also** Pa.R.Crim.P. 584(A) (providing that “[a]ll motions for change of venue or for change of venire shall be made to the court in which the case is currently pending”). We reiterate that this Court has approved the procedure of challenging venue in an omnibus pretrial motion.¹⁸ **See Succi**, 173 A.3d at 283.

Here, Aiken made oral objections on the record at several pre-trial hearings, arguing that the underlying drug purchase occurred in Lehigh County and thus the case was improperly in Dauphin County. **See** N.T.,

¹⁷ Rule 130 and 134 both fall within Chapter 1 of the rules, entitled “Scope of Rules, Construction and Definitions, Local Rules,” Part C, “Issuing Authorities, Venue, Location, and Recording of Proceedings.” Rule 578, on the other hand, falls under Chapter 5, “Pretrial Procedures in Court Cases,” Part G(1), “Motions Procedures.”

¹⁸ We acknowledge that in **Succi**, however, this Court determined that the defendant waived an appellate challenge to venue in New Jersey, because his omnibus pretrial motion did not include it. **See Succi**, 173 A.3d at 283.

11/6/24, at 18; N.T., 12/2/24, at 7; N.T., 1/7/25, at 4. We acknowledge that "a *pro se* appellant enjoys no special benefit" and a "layperson choosing to represent [himself] in a legal proceeding must, to some reasonable extent, assume the risk that [his] lack of expertise and legal training will prove [his] undoing." ***Commonwealth v. Westlake***, 295 A.3d 1281, 1286 n.8 (Pa. Super. 2023) (citation omitted). Although Aiken did not file an omnibus pretrial motion challenging venue, and he unartfully referred to "subject matter jurisdiction," the gist of his arguments was clear. Thus, we proceed to review the merits of his claim.

We first observe the lack of pertinent information in the record. As stated above, the state trooper filed a police criminal complaint in Lehigh County, but the reasons for transferring the charges to Dauphin County are not apparent from the record. There is no documentation in the record showing the transfer from Lehigh County. At no point in the trial court proceedings did the Commonwealth offer an explanation. Instead, the Commonwealth's sole response to Aiken's venue challenge was that Judge Engle had already ruled on it. The Commonwealth did not dispute that the entirety of the underlying controlled drug purchase occurred in Lehigh County. Significantly, the Commonwealth opted to try this case separately from the other three dockets, distinguishing "the factual nature of the other charges" and explaining its desire to avoid "revictimiz[ing]" Brianna. N.T., 2/24/25, at 8. On this record, we cannot conclude that the Commonwealth met its burden

of establishing proper venue. **See Callen**, 198 A.3d at 1158; **see also id.** at 1160 (explaining that a “single criminal episode” exists when “a number of charges are logically or temporally related and share common issues of law and fact”).

Furthermore, the record does not include this supposed initial ruling by Judge Engle. As summarized above, Aiken orally raised venue at a hearing on November 6, 2024 before Judge Curcillo, who advised him to file a motion. **See** N.T., 11/6/24, at 18-20. At the next hearing, on December 2, 2024 before Judge Engle, Aiken again objected to venue, and the Commonwealth responded: “Your Honor **has ruled of any** of his venue objections and . . . it’s not proper that they be raised at all before the jury.” N.T., 12/2/24, at 10 (emphasis added). This statement, as transcribed, is not clear as to whether Judge Engle had ruled on venue, especially in the absence at that time of any written motion by Aiken. In any event, there is no prior order nor docket entry indicating that any trial judge had issued a ruling on venue. Nevertheless, at subsequent hearings, voir dire, as well as sentencing, the parties and Judge Curcillo proceeded on the premise that Judge Engle had ruled on the issue, and Judge Curcillo denied relief on that basis. **See also** Trial Court Opinion, 10/6/25, at 2 (explaining that Judge Engle had already ruled on venue and the trial court “declined to revisit the issue”). On this record, we cannot determine the trial court’s initial reason for denying Aiken’s venue challenge, nor even conclude that an initial ruling was entered.

For the foregoing reasons, on this particular record, we determine that Aiken is entitled to relief. We emphasize: the lack of any documentation transferring the Lehigh County charges to Dauphin County; the lack of any explanation, at the time of transfer or in any of the trial court proceedings by the Commonwealth for the transfer; the lack of a record for an initial ruling on venue; the trial court's explanation that it denied relief because of this supposed initial ruling; and the lack of any other reasoning on the merits for the court's denial of relief.

At this juncture we briefly consider the Commonwealth's additional contention, raised for the first time on appeal, that Aiken did not claim any prejudice. **See** Commonwealth's Brief at 13. In support, the Commonwealth reasons that "Rule 584 motions require proof that a fair and impartial jury trial cannot be held in that county." **Id.** Rule 584(A) provides:

All motions for change of venue . . . shall be made to the court in which the case is currently pending. Venue . . . may be changed by that court ***when it is determined after hearing that a fair and impartial trial cannot otherwise be had in the county where the case is currently pending.***

Pa.R.Crim.P. 584(A). The Pennsylvania Supreme Court has stated: "Our criminal procedural rules provide a system in which defendants can seek transfer of proceedings to another judicial district due to prejudice or pre-trial publicity." **Callen**, 198 A.3d at 1157 (citation omitted).

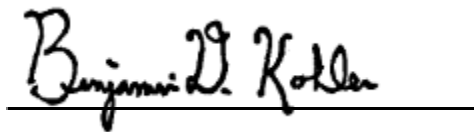
While Aiken did not explicitly cite prejudice in his oral objections to venue, we incorporate our above discussion on the lack of a record in this

matter, and decline to deny relief on this basis. Aiken did not seek to transfer venue in the first instance; instead, the Lehigh County charges had already transferred to Dauphin County before the preliminary hearing, and in the trial court proceedings he objected to it.

For the foregoing reasons, we reverse Aiken's convictions, vacate the judgment of sentence, and remand for transfer of this case to Lehigh County. ***See Succi***, 173 A.3d at 284 (explaining that dismissal is not the proper remedy for improper venue, and instead, we "transfer[] cases to another judicial district when improper venue is determined").

Convictions reversed. Judgment of sentence vacated. Case remanded for further proceedings consistent with this memorandum. Jurisdiction relinquished.

Judgment Entered.

A handwritten signature in black ink, reading "Benjamin D. Kohler", is written over a horizontal line.

Benjamin D. Kohler, Esq.
Prothonotary

Date: 10/23/2026