

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

ANDREW IOANNIDIS,	:
	:
Petitioner	:
	:
v.	:
	:
TOM WOLF, in his official capacity as	:
Governor of the Commonwealth of	:
Pennsylvania	:
	:
KATHY BOOKVAR, in her official capacity	:
as Secretary of the Commonwealth of	:
Pennsylvania	:
	:
Defendants	:

NOTICE

YOU HAVE BEEN SUED IN COURT. If you wish to defend against the claims set forth in the following pages, you must take action within thirty (30) days after this Petition for Review and Notice are served, by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claimed in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Dauphin County Lawyer Referral Service
213 North Front Street
Harrisburg, PA 17101
(717) 232-7536

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Pennsylvania	:
	:
Defendants	:

NOTICE TO PLEAD

TO: TOM WOLF

You are hereby notified to file a written response to the enclosed petition for review within thirty (30) days from service hereof or a judgment may be entered against you.

Respectfully Submitted,

Dated: December 6, 2020

By: /s/ Andrew Ioannidis
457 Pleasant View Road
New Cumberland, PA 17070
ioannidisLaw@gmail.com
908-268-7571
Petitioner

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 Defendants :

NOTICE TO PLEAD

TO: KATHY BOOKVAR

You are hereby notified to file a written response to the enclosed petition for review within thirty (30) days from service hereof or a judgment may be entered against you.

Respectfully Submitted,

Dated: December 6, 2020

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STATEMENT OF JURISDICTION

2. This Court has original jurisdiction over this action pursuant to 42 Pa.C.S. §761(a)(1).

PARTY SEEKING RELIEF

3. Petitioner, Andrew Ioannidis, is an unaffiliated voter from York County.

PARTIES WHOSE ACTION IS AT ISSUE

4. Respondent Tom Wolf in his official capacity as Governor of the Commonwealth of Pennsylvania failed to uphold and enforce the law and certified inaccurate election results.
5. Respondent Kathy Bookvar in her official capacity as Secretary of the Commonwealth of Pennsylvania failed to uphold and enforce the law and certified inaccurate election results.

STATEMENT OF MATERIAL FACTS

6. The General Election was November 3, 2020.
7. Approximately **1,823,148** mail-in and/or absentee ballots were sent to voters in the Commonwealth.
8. Approximately **1,400,000** mail-in and/or absentee ballots were returned by purported voters in the Commonwealth.
9. Approximately **2,500,000** mail-in and/or absentee ballots were ultimately counted and certified by the Respondents.
10. Approximately **22,686** mail-in and/or absentee ballots were returned on the same day they were mailed to the purported voter in the Commonwealth.
11. Approximately **32,591** mail-in and/or absentee ballots were returned the day after they were mailed to the purported voter in the Commonwealth.

12. Approximately **20,000** mail-in and/or absentee ballots were returned before they were mailed to the purported voter in the Commonwealth.
13. Approximately **8,021** ballots, and approximately **30,000** mail-in and/or absentee ballots were submitted by dead people and counted by the Philadelphia County Board of Elections.
14. Approximately **4,984** mail-in and/or absentee ballots were counted that were never requested by a voter in the Commonwealth.
15. Approximately **144, 000 to 288,000** completed mail-in and/or absentee ballots were transported by a USPS agent, from a New York state USPS facility that did not have the capacity to process mail, through New Jersey, and into Dauphin and Lancaster Counties.
16. **100,000 to 120,000** illegal votes were injected via USB and/or USBVcard devices more than 24 times and counted. Approximately 61 of these USB and/or USBVcards cannot be accounted for.
17. The Governor and the Secretary illegally certified voting machines that changed up to **1,200,000** votes against non-democrats
18. Non-government organization(s) associated with Facebook Billionaire Mark Zuckerberg controlled the number of polling locations
19. Non-government organization(s) associated with Facebook Billionaire Mark Zuckerberg controlled the number of, and paid for, vote drop boxes.
20. Non-government organization(s) associated with Facebook Billionaire Mark Zuckerberg controlled the selection and paying of election staff.
21. Non-government organization(s) had the ability to modify the voting rolls.
22. The United States Postal Service instructed staff to backdate ballots that were received after Election day.
23. Non-democrat election observers were not allowed to observe the counting of the votes.
24. My wife and I had different polling locations despite sharing a residence.

25. I was treated disparately by the Respondents.

26. My vote was debased and/or diluted by the Respondents.

COUNT 1 – WRIT OF MANDAMUS

27. Petitioners incorporate the foregoing paragraphs as if fully set forth at length.

28. Petitioner has a 14th amendment right to equal protection under the law.

29. Respondents have a duty to comply with the laws of the Commonwealth of Pennsylvania.

30. I was treated disparately by the Respondents.

31. My vote was debased and/or diluted by the Respondents.

32. Petitioner has no adequate remedy at law to redress the harm caused by Respondents' violation of the Pennsylvania Election Code and the United States Constitution.

33. Mandamus is necessary to prevent the substantial injury and immediate and irreparable harm that Petitioner would suffer if Respondents are permitted to violate the laws of the Commonwealth of Pennsylvania and the United States Constitution.

34. A greater injury would occur in refusing mandamus than granting it because refusing mandamus would uphold egregiously inaccurate election results and destroy citizens' faith in the electoral process.

COUNT 2 – Preliminary Injunction

35. Petitioners incorporate the foregoing paragraphs as if fully set forth at length.

COUNT 3 – Declaratory Judgment

36. Petitioners incorporate the foregoing paragraphs as if fully set forth at length.

WHEREFORE, Petitioner respectfully requests this Honorable Court to immediately enter an Order Declaring the 2020 General Election to be contested. Petitioner respectfully requests an immediate hearing to establish an expedited discovery schedule. Petitioner respectfully requests a writ of mandamus in his favor and against Respondents compelling Respondents to decertify the 2020 General Election results and compelling the Respondents to conduct a full audit and recount whereby only the legal votes are counted. Petitioner also respectfully requests an immediate, emergency writ of injunction in his favor and against Respondents prohibiting Respondents from taking any further action to perfect the certification of the results of the November 3, 2020, General Election in Pennsylvania for the offices of President and Vice President of the United States of America or certifying the remaining results of the Election for U.S. Senators and Representatives. More specifically, Petitioner seeks an injunction that prohibits the Executive-Respondents from taking official action to tabulate, compute, canvass, certify, or otherwise finalize the results of the Election as to the federal offices and that prohibits the Executive-Respondents from undertaking the following actions:

- I. Secretary Boockvar from taking official action pursuant to 25 Pa. Stat. §§ 3159, 3160, 3163, 3164, 3165, 3166; from receiving, tabulating, computing, canvassing, or laying before the Governor any certificate of election or the votes cast for any candidate for federal office in the Election; from taking official action pursuant to 25 Pa. Stat. § 2621(f) “[t]o receive from county boards of elections the returns of primaries and elections, to canvass and compute the votes cast for candidates” for federal offices; from “proclaim[ing] the results of such primaries and elections”; and from issuing certificates of election to the successful candidates at such elections;
- II. Governor Wolf from taking official action pursuant to 25 Pa. Stat. §§ 3160, 3163, 3165, 3166; from issuing any commission resulting from the Election as to federal offices; and from transmitting the returns of the Election to the President of the U.S. Senate or the

Speaker of the House of Representatives. To the extent that the above-prohibited actions have already taken place, Petitioners seek an injunction to restore the status quo ante, compelling Respondents to nullify any such actions already taken, until further order of this Court.

Respectfully submitted, this 6th day of December, 2020.

By: /s/ Andrew Ioannidis
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Petitioner

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CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently than non-confidential information and documents.

Respectfully Submitted,

Dated: December 6, 2020

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