

NICHOLE MISSINO, LEAH HOOPES

And

GREGORY STENSTROM, *ALL PRO SE*

Petitioners

v.

**DELAWARE COUNTY BOARD OF
ELECTIONS**

And,

**DELAWARE COUNTY BUREAU OF
ELECTIONS,**

And,

DELAWARE COUNTY

And,

IN THEIR OFFICIAL CAPACITIES

JAMES M. PARKS,

And

JOHN P. MCBLAIN

And

JAMES P. ALLEN,

And

ROBERT WRIGHT,

And

WILLIAM F. MARTIN,

And,

ASHLEY LUNKENHEIMER,

IN THE DELAWARE COUNTY COURT
OF
COMMON PLEAS, PENNSYLVANIA

No.: CV-2022-008091

CIVIL ACTION, CIVIL LAW, ELECTION
LAW

AMENDED COMPLAINT

DISCOVERY REQUESTED

EVIDENTIARY HEARING REQUESTED

JURY TRIAL REQUESTED

And,

SCOTT ALBERTS,

And,

CHRISTINE REUTHER,

And,

MONICA TAYLOR,

And,

ELAINE P. SCHAEFER,

And,

KEVIN M. MADDEN,

And,

RICHARD R. WOMACK, JR

Respondents

AMENDED COMPLAINT

1. For the reason enumerated in previously submitted ANSWER TO DEFENDANTS' PRELIMINARY OBJECTIONS, Plaintiffs dutifully amend their Complaint by adding as named Defendants: Delaware County, James P. Allen, Robert Wright, James M. Parks, William F. Martin, John P. McBlain, Ashley Lunkenheimer, Scott Alberts, Christine Reuther, Monica Taylor, Elaine P. Schaefer, Kevin M. Madden, and Richard Womack, Jr.
2. The added Defendants named in their persons, are so named in their official capacities as government representatives, officials and named agents of the corporate bodies of the other Defendants, all with specific nexus to the complaint.
3. During three injunctive hearings related to the complaint, and 15.5 hours of

testimony, statements were elicited from, and presented by, witnesses that the newly named Defendants gave explicit orders, or were directly aware of, or collaborated in said orders, to their subordinate employees of the County, subordinate contractors, and other outside agents, to commit violations of law.

4. Specifically, Laureen Hagan, Delaware County Clerk of Elections, testified during the injunctive hearing of November 21st, 2022, that she had received orders from James P. Allen, Director of Elections; and, Robert Wright, County IT Director; and “the solicitors” while looking toward Defendants’ table, to break federal and state laws regarding sending mail in ballots to unverified voters, and the recording of same. Presiding Judge Dozor immediately sustained Defendants’ objection to Plaintiffs’ immediate follow-up question to name said solicitors, hence the necessity to name all of the presumed solicitors in this amendment pending further proceedings.
5. James P. Allen, Director of Elections, testified of committing further election law violations, that he either made unilaterally, or at the direction of newly named Defendants..
6. Plaintiffs can only presume that “the solicitors,” who are subordinates of the Board of Elections Executive Members, who are, in turn, subordinates of the Delaware County Council, must have, or should have, provided orders and direction to violate federal and state laws with the knowledge and consent of their respective chains of command, hence the addition of their names, in person, in their official capacities.
7. Among multiple matters related to the cause of action, for further discovery, deposition, and evidentiary hearings will be the examination of Delaware County Fiduciary Bond contracts and requirements, which presumably include that no knowing violations of laws be made, or caused to be made, by authorized agents of the County without notice, communication, legal opinion, correspondence with, or approval by, County Fiduciary Bonding agents and Bond holders.

Respectfully submitted:



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GREGORY STENSTROM

Date: 21DEC2022

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VERIFICATION

We, Nichole Mission, Leah Hoopes and Gregory Stenstrom, hereby verify the statements made in the foregoing pleadings are true correct to the best of our knowledge, information, and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa. C.S. section 4904 relating to unsworn falsification to authorities.

Respectfully submitted:



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