

BEFORE THE STATE OBJECTIONS PANEL

In re: Nomination Petition for Primary Election of Jeff Shipley, candidate for State Representative for the 87th District.

OBJECTIONS TO NOMINATION PETITION:

I, the undersigned elector who resides in the 87th District of the Iowa House of Representatives (to be elected for the 90th General Assembly of the State of Iowa), object pursuant to Iowa Code § 43.24 to the Nomination Petition for Primary Election filed by Jeff Shipley as a candidate for State Representative. Shipley filed his petition, along with an Affidavit of Candidacy, in the office of the Secretary of State on March 14, 2022. Shipley seeks the nomination of the Republican party.

I. Requirements of a valid petition.

A candidate for State Representative needs signatures from not less than 50 eligible electors who are residents of the district on his nominating petition. Iowa Code § 45.1(5). Iowa Code § 43.14(2)(c) states that a signature line on a nomination petition “shall not be counted if an eligible elector supplies only a partial address or a post office box address, or if the signer’s address is obviously outside the boundaries of the district.” The Secretary of State’s candidate guide helpfully explains this requirement:

All signers must include the following information:

- A signature (the signature may be printed)
- **The address of their residence**

This must include a house number, street name, and city. Providing only a post office box is not sufficient. A signer who is homeless should describe where the signer lives or write “homeless”.

[§43.14(2), 43.15(1)]

(Secretary of State 2022 Primary Candidate Guide 8). In addition, “[a] signature line shall not be counted if any of the required information is crossed out or redacted at the time the nomination papers are filed with the state commissioner...” Iowa Code § 45.5(2)(d). Iowa Code § 43.15(3) also requires signers of petitions to include the “date of signing.”

II. Shipley submitted 53 signatures. Five of those signatures are invalid, leaving him with 48 signatures and having failed to qualify for the primary ballot.

Shipley’s nomination petitions consist of nine pages:

Page number:	Number of signatures:
1	4
2	7
3	7
4	6
5	19
6	2
7	4
8	1
9	3
Total:	53

The following signatures are invalid:

Page number:	Line number:	Objection:
1	4	The residence located at 2431 220th St., Fairfield, is not located in the 87th House District.
2	1	Improperly dated signature (date listed is 3-13-52).
2	3	The building located at 602 E. Washington Ave., Fairfield is a multi-unit building. There is no unit number listed. Partial addresses are not valid.
3	3	The building located at 205 W. Briggs Ave., Fairfield is a multi-unit building. There is no unit number listed. Partial addresses are not valid.
4	5	Partial address, city is not legibly listed.

The residence located at 2431 220th St., Fairfield, is in the current Senate District 42. A copy of the district map is attached. This district includes Buchanan Township in Jefferson County, except for those portions that are in the Fairfield city limits. Also included is the lookup of this address for the current General Assembly. The house is shown on the North side of the Buchanan-Cedar township line in Jefferson County. Finally, the map for House District 87, effective for the elections this year for the 90th General Assembly is attached. The new district excludes Buchanan Township. These three documents are included as Exhibit B.

The building located at 602 E. Washington, Fairfield, is a multi-unit building. As shown in Exhibit C, the building has multiple mailboxes, one for each unit. Exhibit C

is taken from Google Maps. Because the signer provided a partial address, the signature is not valid.

The building located at 205 W. Briggs, Fairfield, is also a multi-unit building. As shown in Exhibit D, the building is a traditional apartment building. Exhibit D is also taken from Google Maps. It should also be noted that several other individuals who lived at this location signed Shipley's petition and properly listed a unit number. See, Page 1, line 1; Page 4, line 2; and Page 5, line 12.

IV. Conclusion

Shipley has failed to qualify for the Republican primary for State Representative because he has not complied with the requirement to submit 50 or more signatures. The State Objection Panel should sustain the objections and direct that Shipley's name not appear on the primary ballot.

Respectfully submitted:

Thomas Wenstrand
Henry County

ATTORNEY FOR OBJECTOR:



Alan R. Ostergren
Alan R. Ostergren, PC
500 Locust Street, Suite 199
Des Moines, Iowa 50309
(515) 207-0134
alan.ostergren@ostergrenlaw.com