

# Supreme Court of Pennsylvania

Court of Common Pleas

Civil Cover Sheet

LUZERNE

County



For Prothonotary Use Only:

Docket No: 202607908

TIME STAMP

The information collected on this form is used solely for court administration purposes. This form does not supplement or replace the filing and service of pleadings or other papers as required by law or rules of court.

SECTION A	<b>Commencement of Action:</b> <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Petition <input type="checkbox"/> Transfer from Another Jurisdiction <input type="checkbox"/> Declaration of Taking	
	Lead Plaintiff's Name: WALTER L. GRIFFITH, JR.	Lead Defendant's Name: Christopher Belles
	Are money damages requested? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Dollar Amount Requested: <input checked="" type="checkbox"/> within arbitration limits (check one) <input type="checkbox"/> outside arbitration limits
	Is this a <i>Class Action Suit</i> ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Is this an <i>MDJ Appeal</i> ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Name of Plaintiff/Appellant's Attorney: <u>J. Chadwick Schnee, Esq.</u> <input type="checkbox"/> Check here if you have no attorney (are a Self-Represented [Pro Se] Litigant)	

SECTION B	<b>Nature of the Case:</b> Place an "X" to the left of the <b>ONE</b> case category that most accurately describes your <b>PRIMARY CASE</b> . If you are making more than one type of claim, check the one that you consider most important.		
	<b>TORT (do not include Mass Tort)</b> <input type="checkbox"/> Intentional <input type="checkbox"/> Malicious Prosecution <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Nuisance <input type="checkbox"/> Premises Liability <input type="checkbox"/> Product Liability (does not include mass tort) <input type="checkbox"/> Slander/Libel/ Defamation <input type="checkbox"/> Other: _____	<b>CONTRACT (do not include Judgments)</b> <input type="checkbox"/> Buyer Plaintiff <input type="checkbox"/> Debt Collection: Credit Card <input type="checkbox"/> Debt Collection: Other _____ <input type="checkbox"/> Employment Dispute: Discrimination <input type="checkbox"/> Employment Dispute: Other _____ <input type="checkbox"/> Other: _____	<b>CIVIL APPEALS</b> Administrative Agencies <input type="checkbox"/> Board of Assessment <input type="checkbox"/> Board of Elections <input type="checkbox"/> Dept. of Transportation <input type="checkbox"/> Statutory Appeal: Other _____ <input type="checkbox"/> Zoning Board <input type="checkbox"/> Other: _____
	<b>MASS TORT</b> <input type="checkbox"/> Asbestos <input type="checkbox"/> Tobacco <input type="checkbox"/> Toxic Tort - DES <input type="checkbox"/> Toxic Tort - Implant <input type="checkbox"/> Toxic Waste <input type="checkbox"/> Other: _____	<b>REAL PROPERTY</b> <input type="checkbox"/> Ejectment <input type="checkbox"/> Eminent Domain/Condemnation <input type="checkbox"/> Ground Rent <input type="checkbox"/> Landlord/Tenant Dispute <input type="checkbox"/> Mortgage Foreclosure: Residential <input type="checkbox"/> Mortgage Foreclosure: Commercial <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Other: _____	<b>MISCELLANEOUS</b> <input type="checkbox"/> Common Law/Statutory Arbitration <input checked="" type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Mandamus <input type="checkbox"/> Non-Domestic Relations <input type="checkbox"/> Restraining Order <input type="checkbox"/> Quo Warranto <input type="checkbox"/> Replevin <input type="checkbox"/> Other: _____
	<b>PROFESSIONAL LIABILITY</b> <input type="checkbox"/> Dental <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional: _____		

Updated 1/1/2011

J. Chadwick Schnee, Esquire (PA 306907)  
Schnee Legal Services, LLC  
74 E. Main Street, #648  
Lititz, PA 17543  
(717) 400-5955  
Fax: (717) 882-5271  
[chadwick@schneelegal.com](mailto:chadwick@schneelegal.com)

*Attorney for Plaintiffs Walter L. Griffith, Jr. and Benjamin Herring*

---

WALTER L. GRIFFITH, JR. and BENJAMIN	:	
HERRING,	:	
Plaintiffs,	:	IN THE COURT OF COMMON PLEAS
	:	OF LUZERNE COUNTY,
	:	PENNSYLVANIA
	:	
	:	CIVIL ACTION – LAW
v.	:	
	:	NO. <u>202607908</u>
CHRISTOPHER BELLES, individually,	:	
Defendant.	:	

---

**COMPLAINT**  
**(Violation of Pennsylvania Constitutional Right to Privacy; Petitioner Intimidation;**  
**Invasion of Privacy; Injunctive Relief)**

Plaintiffs Walter L. Griffith, Jr. and Benjamin Herring, (“Plaintiffs”), by and through this undersigned counsel, J. Chadwick Schnee, Esq. of Schnee Legal Services, LLC, bring this Complaint against Christopher Belles (“Defendant”), individually, and aver as follows:

**NATURE OF THE ACTION**

1. This action arises from Defendant’s deliberate, public disclosure of the names and home addresses of citizens who exercised their constitutional right to sign or associate with a referendum petition seeking the repeal of Luzerne County Ordinance No. 2026-11 (“Ordinance”). Defendant, a sitting member of the Luzerne County Council, published this private information on Facebook on or about June 30, 2026, in his individual capacity.

2. The referendum petition process is a fundamental right of democratic self-governance guaranteed by the Luzerne County Home Rule Charter (“Charter”) and rooted in Article I, Sections 1 and 2 of the Pennsylvania Constitution. The right to sign a referendum petition (like the right to vote) carries with it an expectation of privacy and freedom from intimidation.

3. Defendant’s publication of the signers’ names and home addresses was not a lawful disclosure of public records; rather, it was an act of targeted exposure designed to identify, and thereby deter, citizens from participating in the referendum process. The disclosure chills the exercise of a fundamental constitutional right at the most critical moment: when the petition deadline is imminent and signature collection is active.

4. Plaintiffs seek a permanent injunction requiring Defendant to immediately remove the post and all copies thereof, to refrain from any further disclosure of petition signers’ personal information, and to issue a retraction; as well as declaratory relief, damages pursuant to 42 U.S.C. § 1983, and such other relief as equity demands.

#### **PARTIES**

5. Plaintiff Walter L. Griffith, Jr. is an adult individual residing at 348 Highland Avenue, Trucksville, Pennsylvania 18708. He is a registered voter in Luzerne County, a member and chair of the Petitioners Committee for the Referendum of Ordinance No. 2026-11, and one of the individuals whose name and address was publicly posted by Defendant.

6. Plaintiff Benjamin Herring is an adult individual residing in Luzerne County, Pennsylvania at 410 Raspberry Road, Duryea, PA 18642. He is a registered voter in Luzerne County, a member of the Petitioners Committee for the Referendum of Ordinance No. 2026-11, and one of the individuals whose name and address was publicly posted by Defendant.

7. Defendant is an adult individual with an office at 200 N. River Street, Wilkes-Barre, PA 18711, Luzerne County, Pennsylvania. Defendant serves as a duly elected member of the Luzerne County Council. He is sued here solely in his individual capacity. The conduct described herein was undertaken by Defendant personally, on his own Facebook page, and was not authorized, directed, or ratified by the Luzerne County Council or by Luzerne County. Luzerne County is not a party to this action.

### **JURISDICTION AND VENUE**

8. This Court has subject matter jurisdiction pursuant to 42 Pa.C.S. § 931. Jurisdiction to grant injunctive and declaratory relief exists under 42 Pa.C.S. § 931, Pa. R.C.P. 1531, and the Pennsylvania Declaratory Judgments Act, 42 Pa.C.S. §§ 7531-7541. This Court has jurisdiction over Plaintiffs' federal claim under 42 U.S.C. § 1983, as Pennsylvania courts of common pleas exercise concurrent jurisdiction over such claims. *See Howlett v. Rose*, 496 U.S. 356, 358 (1990).

9. Venue is proper in this Court under Pa. R.C.P. 1006, as Defendant resides in Luzerne County and all acts giving rise to this action occurred in or originated from Luzerne County.

### **STATEMENT OF FACTS**

#### **A. The Referendum Petition and the Petitioners Committee**

10. On June 9, 2026, the Luzerne County Council voted 7 to 4 to adopt Ordinance No. 2026-11, the Luzerne County Human Relations Ordinance. Defendant voted for the Ordinance.

11. Plaintiffs and other citizens exercised their right under Article X of the Charter to seek a referendum on the Ordinance. Under Section 10.06(A) of the Charter, an application

signed by at least one hundred (100) registered voters, stating the names and mailing addresses of the signatories, must be filed with the Office of Clerk of County Council to commence the referendum procedure.

12. On June 17, 2026, Plaintiffs filed the referendum application with the Clerk of the Luzerne County Council (“Clerk”). The application identified the members of the Petitioners Committee by name and mailing address, as required by Section 10.06(A).

13. The referendum application filed with the Clerk is a governmental record maintained by the Office of Clerk of County Council.

14. Luzerne County adopted and required an affirmation, executed under penalty of perjury, from members of the public seeking copies of the referendum application and referendum petition records, consistent with the privacy and use restrictions Pennsylvania law imposes on other categories of election-related records maintained by county government. *See* 25 Pa.C.S. §§ 1207(b), 1404(b)(3). By information and belief, this affirmation required requesters to state that the records “will not be used for purposes unrelated to elections, political activities or law enforcement” and would not be published on the Internet. *See generally Luzerne County requiring affirmation to prevent online sharing of petition to repeal non-discrimination ordinance*, THE CITIZENS' VOICE, June 29, 2026, attached hereto at Exhibit A.

15. Regardless of whether the Election Code's use restrictions apply of their own force to a referendum petition filed under the Charter, as opposed to a record maintained by the county board of elections, Luzerne County's own decision to condition access to the referendum application and petition records on execution of this affirmation created a reasonable and legitimate expectation, shared by Plaintiffs and other petition signatories, that their names and

home addresses would not be selectively extracted from the referendum application and broadcast to the public online.

16. Despite the requirement to complete the affirmation, by information and belief, Luzerne County permitted Defendant, by virtue of his status as a sitting member of County Council, to obtain the referendum applications and/or referendum petitions without completing the form required of all other requesters of such information. *See Petition to repeal Luzerne County non-discrimination ordinance posted online*, THE CITIZENS' VOICE, June 30, 2026, attached hereto at Exhibit B.

**B. Defendant's Public Disclosure**

17. On or about June 30, 2026, Defendant published a post on his personal Facebook page that publicly identified the names and home addresses of individuals who signed the referendum petition application filed with the Clerk's Office. *See June 30, 2026 post of Defendant at Exhibit C.*

18. Upon information and belief, Defendant obtained the names and addresses of the signatories from the referendum application filed with the Clerk's Office, either individually or in his capacity as a member of the Luzerne County Council.

19. The post acknowledged that "we have a fine tradition of a secret ballot," but the Defendant publicized the names and home addresses of Luzerne County residents who signed the referendum applications and/or referendum petitions because, in Defendant's view, these citizens "decide[d] to attempt to overturn the will of those elected ... [and] their privacy is outweighed by the greater need for transparency." *See Exhibit C.* The post included a link to an Internet address containing the names and home addresses of Luzerne County residents who signed the referendum application and/or referendum petition.

20. In other words, Defendant unilaterally determined that the individual Luzerne County residents who signed the referendum application and/or referendum petition no longer had any privacy interest in their private information being publicly disseminated outside of the protections afforded by the affirmation process described above.

21. Defendant's post was publicly accessible to all members of the public, including individuals who may harbor hostility toward those who seek to repeal the Ordinance.

22. As a direct result of Defendant's publication, Plaintiffs and other signatories have received hostile communications from members of the public, had their businesses and livelihoods threatened and have otherwise been harassed and intimidated as a result of exercising their right to petition guaranteed under the Pennsylvania Constitution.

23. Other registered voters who were considering signing the referendum petition have been dissuaded from doing so by Defendant's unilateral disclosure and the reaction it generated.

24. Additionally, certain individuals who have signed the referendum petition have asked to have their names and addresses removed from the petitions due to Defendant's public dissemination of the petition information.

25. The referendum petition deadline under Section 10.06(C) of the Charter is August 8, 2026. Defendant's publication occurred at the most critical juncture of the signature-collection period, when its chilling effect on potential signers is most acute.

**COUNT I —**  
**VIOLATION OF THE PENNSYLVANIA CONSTITUTIONAL RIGHT TO PRIVACY**  
(Pennsylvania Constitution, Article I, §§ 1 and 8)

26. Plaintiffs incorporate by reference all prior averments as if fully set forth herein.

27. Pennsylvania courts analyze the scope of rights under the Pennsylvania Constitution independently of federal constitutional doctrine using the four-factor framework set

forth in *Commonwealth v. Edmunds*, 586 A.2d 887 (Pa. 1991). Applying that independent analysis, Pennsylvania's constitutional privacy protections, grounded in Article I, Section 1, extend to personal information that citizens are compelled to provide to government for a limited governmental purpose. *See generally Pennsylvania State Education Association v. Commonwealth*, 50 A.3d 1263 (Pa. 2012); *Denoncourt v. State Ethics Comm'n*, 470 A.2d 945 (Pa. 1983).

28. Article I, Section 8 of the Pennsylvania Constitution, which protects against unreasonable searches and seizures, has been construed to protect a broader right of privacy in personal information than its federal counterpart. *Commonwealth v. Edmunds*, 586 A.2d 887 (Pa. 1991).

29. Citizens who sign a referendum petition in the exercise of their constitutional right of self-governance have a reasonable expectation that their names and home addresses (provided to the government as required by law for the purpose of initiating a democratic process).

30. Defendant's disclosure was not made in the exercise of any legitimate governmental function. Defendant instead used information he was able to access by virtue of his position as a sitting member of County Council, without completing the affirmation required of other requesters, to further his own personal political ends.

31. Plaintiffs have suffered, and continue to suffer, harm to their privacy, reputation, and personal security as a proximate result of Defendant's disclosure, and are threatened with continuing harm absent injunctive relief. Plaintiffs seek declaratory and injunctive relief under this Count. Plaintiffs' claim for damages arising from this same conduct is asserted under Count III below, pursuant to 42 U.S.C. § 1983.

**COUNT II —**  
**VIOLATION OF THE RIGHT OF POLITICAL ASSOCIATION AND PETITION**  
(Pennsylvania Constitution, Article I, §§ 2 and 20)

32. Plaintiffs incorporate by reference all prior averments as if fully set forth herein.

33. Article I, Section 2 of the Pennsylvania Constitution vests all political power in the people and protects the right to alter or reform government through democratic processes, including referendum. Article I, Section 20 expressly protects the right “to apply to those invested with the powers of government for redress of grievances.” Signing a referendum petition is protected political activity at the core of both provisions.

34. Defendant, a government official, used information he was able to access by virtue of his official position to publish petitioners' identities for the purpose of, or with the effect of, exposing them to public criticism, intimidation, and retaliation, thereby chilling the exercise of the referendum right protected by Article I, Sections 2 and 20.

35. This conduct directly chills the exercise of constitutionally protected referendum rights by Plaintiffs and by others who might otherwise sign the petition. The chilling effect is particularly severe given the imminent August 8, 2026 deadline, when would-be signers face immediate reputational and personal-security consequences for signing.

36. Plaintiffs seek declaratory and injunctive relief for this violation of the Pennsylvania Constitution. Plaintiffs' related federal claim, and request for damages arising from the same conduct, is set forth in Count III below.

**COUNT III —**  
**VIOLATION OF THE FIRST AND FOURTEENTH AMENDMENTS TO THE**  
**UNITED STATES CONSTITUTION; 42 U.S.C. § 1983**  
(Pennsylvania Election Code, 25 P.S. § 3527; Pennsylvania Home Rule Charter and Optional  
Plans Law, 53 Pa.C.S. § 2962)

37. Plaintiffs incorporate by reference all prior averments as if fully set forth herein.

38. The First Amendment to the United States Constitution, applicable to the states through the Fourteenth Amendment, protects the right of political association and the right to petition government for redress of grievances. The government may not take action designed to chill the exercise of these rights, including the filing of referendum petitions. *Buckley v. American Constitutional Law Foundation, Inc.*, 525 U.S. 182 (1999) (striking disclosure requirements that chilled petition circulation).

39. The United States Supreme Court has recognized that even where petition signatories' information is technically a public record, an as-applied challenge may lie where the disclosure is used to threaten or harass signers. *Doe v. Reed*, 561 U.S. 186, 201 (2010) (citing *Citizens United v. Federal Election Commission*, 558 U.S. 310 (2010)).

40. Although Defendant's conduct was undertaken for his own personal political purposes and outside the scope of any authorized county function, his ability to access the referendum records without completing the affirmation required of other requesters depended on his status and office as a sitting member of County Council. Defendant's exercise of that official access to obtain and publish the information constitutes action under color of state law within the meaning of 42 U.S.C. § 1983, and Defendant is liable in his individual capacity for the resulting constitutional violation.

41. This conduct directly chills the exercise of constitutionally protected referendum and petition rights guaranteed under the First and Fourteenth Amendments to the United States Constitution, actionable pursuant to 42 U.S.C. § 1983.

42. As a direct and proximate result of Defendant's conduct, Plaintiffs are entitled to compensatory damages, punitive damages based on Defendant's willful and wanton disregard for

Plaintiffs' constitutional rights, and reasonable attorneys' fees and costs pursuant to 42 U.S.C. § 1988, in addition to declaratory and injunctive relief.

**COUNT IV —  
INVASION OF PRIVACY (PUBLIC DISCLOSURE OF PRIVATE FACTS)**  
(Restatement (Second) of Torts § 652D; Pennsylvania Common Law)

43. Plaintiffs incorporate by reference all prior averments as if fully set forth herein.

44. Pennsylvania recognizes the tort of invasion of privacy by public disclosure of private facts. *Harris v. Easton Publishing Co.*, 335 Pa. Super. 141, 160 (1984).

45. The elements of this tort are: (1) publicity given to (2) private facts concerning plaintiff (3) that would be highly offensive to a reasonable person and (4) that are not legitimately of public concern.

46. Plaintiffs' home addresses, provided to the government subject to the county's own affirmation requirement described above, are private facts within the meaning of this tort. Although the referendum application is a governmental record, the selective extraction and mass publication of signers' home addresses by a government official for political purposes, without completing the affirmation required of other requesters, is qualitatively different from the mere existence of the record.

47. The public disclosure of Plaintiffs' home addresses in the context of politically charged public commentary is highly offensive to a reasonable person and exposes Plaintiffs to harassment and potential physical risk.

48. Plaintiffs signed the referendum application for the limited purpose of exercising their civic rights, not to have their home addresses broadcast publicly by an elected official.

49. Defendant's publication of Plaintiffs' private information constitutes a tortious invasion of privacy for which Plaintiffs are entitled to damages and injunctive relief.

**COUNT V — PERMANENT INJUNCTION**  
(42 Pa.C.S. § 931; Pa. R.C.P. 1531)

50. Plaintiffs incorporate by reference all prior averments as if fully set forth herein.

51. Plaintiffs have no adequate remedy at law. The ongoing public availability of the home addresses of individuals who signed referendum applications and/or petitions in connection with their protected petition activity exposes them to continuing harassment and chills their exercise of constitutional rights in a way that cannot be remedied by money damages alone.

52. Permanent injunctive relief requiring Defendant to remove the post, to refrain from any further disclosure of the identity or contact information of referendum petition signatories, and to issue a public retraction is necessary and appropriate to remedy and prevent the continuing harm to Plaintiffs.

**PRAYER FOR RELIEF**


**WHEREFORE**, Plaintiffs respectfully request that this Court:

- (a) Enter a permanent injunction requiring Defendant to immediately remove from Facebook and all other online and public venues any post or publication identifying the names and/or home addresses of referendum petition signatories;
- (b) Enter a permanent injunction enjoining Defendant from further disclosing, publishing, or disseminating the names, home addresses, or any other personal identifying information of any referendum petition signatory;
- (c) Order Defendant to issue a public retraction and notice of removal;
- (d) Declare that Defendant’s conduct violated Plaintiffs’ rights under the Pennsylvania Constitution, the United States Constitution, and Pennsylvania law;
- (e) Award Plaintiffs compensatory damages, pursuant to 42 U.S.C. § 1983 and Pennsylvania common law, in an amount to be determined at trial;
- (f) Award Plaintiffs punitive damages, pursuant to 42 U.S.C. § 1983 and Pennsylvania common law, based on Defendant’s willful and wanton disregard for Plaintiffs’ constitutional rights;
- (g) Award Plaintiffs attorneys’ fees and costs pursuant to 42 U.S.C. § 1988 and applicable law;
- (h) Grant such other and further relief as this Court deems just and appropriate.

Respectfully submitted,

SCHNEE LEGAL SERVICES

By: \_\_\_\_\_

  
J. Chadwick Schnee, Esq.  
PA ID 306907  
Schnee Legal Services, LLC

Date: July 2, 2026

74 E. Main Street, #648  
Lititz, PA 17543  
(717) 400-5955  
Fax: (717) 882-5271  
[chadwick@schneelegal.com](mailto:chadwick@schneelegal.com)  
*Attorney for Walter L. Griffith, Jr.  
and Benjamin Herring, Plaintiffs*

**CERTIFICATE OF COMPLIANCE**

I 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 non-confidential information and documents.



---

J. Chadwick Schnee, Esq.  
PA ID 306907

## VERIFICATION

I, Walter L. Griffith, Jr., verify that I am a Plaintiff in this action. I have read the foregoing Complaint and the facts averred therein are true and correct to the best of my knowledge, information, and belief. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. § 4904, relating to unsworn falsification to authorities.

/s/ Walter L. Griffith, Jr.  
Walter L. Griffith, Jr.

Dated: July 2, 2026

## VERIFICATION

I, Benjamin Herring, verify that I am a Plaintiff in this action. I have read the foregoing Complaint and the facts averred therein are true and correct to the best of my knowledge, information, and belief. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. § 4904, relating to unsworn falsification to authorities.

/s/ Benjamin Herring  
Benjamin Herring

Dated: July 2, 2026

# **EXHIBIT A**

LOCAL NEWS

# Luzerne County requiring affirmation to prevent online sharing of petition to repeal non-discrimination ordinance



Former Luzerne County controller Walter Griffith and Luzerne County Council clerk Sharon Lawrence review petitions on Tuesday, June 23, 2026. (JASON ARDAN / STAFF PHOTOGRAPHER)



By **MICHAEL P. BUFFER** | [mbuffer@citizensvoice.com](mailto:mbuffer@citizensvoice.com) | The Citizens'

Voice

● Opt-Out Signal Honored

Getting your **Trinity Audio** player ready...

Luzerne County is requiring anyone requesting digital records of the referendum petition to repeal Luzerne County's new non-discrimination ordinance to sign an affirmation they won't publish the records online.

The affirmation also says the records won't be used "for commercial and other purposes, except purposes related to elections, political activities and law enforcement" as required by state law. The affirmation form cites legal citations that prevent the general public or organizations from publicly uploading, sharing or posting voter registration data online.

Comments posted on social media over the weekend expressed concerns about people who signed the referendum petition being doxxed or harassed. Last week, a repeal referendum committee handed in petition forms with 1,899 signatures. At least 1,161 valid signatures from registered voters were required, which is 1% of the total number of votes cast in Luzerne County in the last gubernatorial election.

Luzerne County is providing a USB flash drive with referendum petition records at: Clerk of Council's office, Courthouse, 200 North River St, Wilkes-Barre, 570-825-1634; and Office of Law, 200 Old Train Station Rd., Wilkes-Barre, 570-760-3199.

A post on the county website says to please call first. Supplies are limited, and there's no fee or charge for the flash drive.

The next step in the referendum process outline in the county home rule charter is getting at least 11,615 signatures — 10% of county votes cast in the 2022 gubernatorial election — in 60 days. If that's done, council would have 30 days to consider repealing the ordinance, and if council does not repeal the ordinance, the county election board would place the repeal referendum on the ballot of the next election.

County council voted on June 9 to approve the ordinance that establishes comprehensive, anti-discrimination requirements for employment, housing, education, health care and public accommodations. The ordinance  
~~empowers a county human relations commission to make determinations~~

---

Critics have argued a county non-discrimination ordinance is unnecessary because of state and federal laws that already prohibit discrimination. Under the ordinance, a person who violates it would be guilty of a summary offense and face a fine of not less than \$100 nor more than \$500.

The ordinance is modeled after other county ordinances that fill gaps in state law and explicitly list sexual orientation and gender identity as protected classes. Supporters have said county commissions make it easier and faster to report and resolve discrimination complaints.

## MORE FROM OUR NEWSROOM

**2026 >**  
**June >**  
**29**

# **EXHIBIT B**

LOCAL NEWS

## Petition to repeal Luzerne County non-discrimination ordinance posted online



Former Luzerne County controller Walter Griffith, left, and Tyler Meyers enter with a box of petitions in the Luzerne County Courthouse on Tuesday, June 23, 2026.  
(JASON ARDAN / STAFF PHOTOGRAPHER)



● Opt-Out Signal Honored

Getting your **Trinity Audio** player ready...

Records related to the referendum petition to repeal Luzerne County's new non-discrimination ordinance are now online.

County Councilman Chris Belles posted the records on LimeWire.com, and a link is posted on his Facebook page, Chris Belles for Luzerne County Council. Belles said he didn't sign **an affirmation form stating he would not post the records online.**

The county is providing a USB flash drive with the records at no charge to anyone who signs the affirmation form. The petition includes the names and addresses of 1,899 persons who signed it, and social media posts have expressed concerns about people who signed the petition being doxxed or harassed.

"The new politics is transparency vs secrecy in government," Belles wrote on Facebook. "In this country, the United States, we have a fine tradition of a secret ballot. When people decide to attempt to overturn the will of those elected, they act publicly, they become public figures, and their privacy is outweighed by the greater need for transparency. That's what the Supreme Court decided in 2010. You don't get to harass or harm anyone, but you ultimately have a right to know who is trying to legislate and override the voters through referendum. I'm proud to help bring this to the surface for everyone to have the knowledge they need to participate in the process."

Last week, a repeal referendum committee handed in petition forms with 1,899 signatures. At least 1,161 valid signatures from registered voters were required, which is 1% of the total number of votes cast in Luzerne County in the last gubernatorial election.

---

The repeal committee is now trying to get at least 11,615 signatures — 10% of county votes cast in the 2022 gubernatorial election — in 60 days. If that’s done, council would have 30 days to consider repealing the ordinance, and if council does not repeal the ordinance, the county election board would place the repeal referendum on the ballot of the next election. It appears that would likely be the primary election in May 2027 due to deadlines to get ballot questions on the November general election ballot.

Walter Griffith, the lead repeal organizer who had served as a county councilman and controller, sent an email to council members on Monday afternoon and claimed releasing unredacted petition records “appears to violate the privacy rights of residents of Luzerne County.”

Griffith noted the referendum process “is a law and procedure provided by our Luzerne County Home Rule Charter” and is not based on the state election code. Under the state election code, the public is entitled to inspect and get copies of election ballot petitions without redactions, and the state posts candidate petitions online.

The referendum process outlined in the county home rule charter has not been attempted since the charter went into full effect in 2012. The repeal committee was established by meeting a charter requirement to collect at least 100 valid signatures from registered voters by the 14th day after the council adopted the ordinance.

Council voted June 9 to approve the ordinance that establishes comprehensive, anti-discrimination requirements for employment, housing, education, health care and public accommodations. The ordinance empowers a county human relations commission to make determinations on discrimination complaints, and council plans to approve another separate ordinance to establish the composition, powers and responsibilities of the human relations commission.

Critics have argued a county non-discrimination ordinance is unnecessary because of state and federal laws that already prohibit discrimination. Under the ordinance, a person who violates it would be guilty of a summary offense and face a fine of not less than \$100 nor more than \$500.

The ordinance is modeled after other county ordinances that fill gaps in

---

## MORE FROM OUR NEWSROOM

**2026 >**

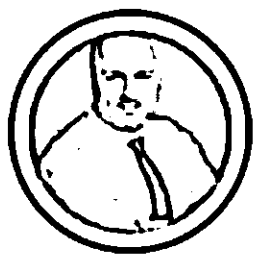
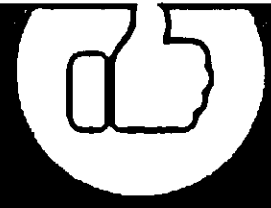
**June >**

**30**

# EXHIBIT C

All Photos Reels More ▾

Send message...



**Chris Belles for Luzerne County Co...**



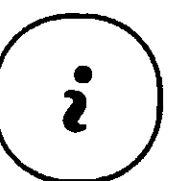
19h ·

The new politics is transparency vs secrecy in government. In this country, the United States, we have a fine tradition of a secret ballot. When people decide to attempt to overturn the will of those elected, they act publicly, they become public figures, and their privacy is outweighed by the greater need for transparency. That's what the Supreme Court decided in 2010. You don't get to harass or harm anyone, but you ultimately have a right to know who is trying to legislate and override the voters through referendum.

I'm proud to help bring this to the surface for everyone to have the knowledge they need to participate in the process. **#transparentNEPA**

limewire.com

limewire.com



4

Like

Comment

Share



**Chris Belles for Luzerne County Co**



Follow

Message

