

SUPREME COURT OF PENNSYLVANIA

Commonwealth of Pennsylvania v. Monte Lowrey

No. 57 MAP 2025 · No. 57 MAP 2025 · Decided June 18, 2026

SUMMARY

This concurring statement addresses the Pennsylvania Supreme Court's dismissal of the Commonwealth's appeal in a case involving whether Pennsylvania's turn-signal statute applies to a vehicle exiting a parking lot onto a roadway. Justice Wecht agrees with the dismissal and criticizes the statute's drafting and lack of clarity, which he states creates unnecessary burdens for law enforcement, lawyers, and courts.

CASE DETAILS

COURT	Supreme Court of Pennsylvania
WRITING FOR THE COURT	Justice David N. Wecht
JURISDICTION	Supreme Court of Pennsylvania
DECIDED	June 18, 2026
DOCKET	57 MAP 2025
DISPOSITION	dismissed
PROCEDURAL POSTURE	The Commonwealth appealed the Pennsylvania Superior Court's order vacating Lowrey's judgment of sentence. The Supreme Court of Pennsylvania dismissed the appeal, and Justice Wecht filed a concurring statement.
PRECEDENTIAL VALUE	Published concurring statement; the author's reasoning is nonbinding standing alone.
PARTIES	Commonwealth of Pennsylvania v. Monte Lowrey

TOPICS

- statutory interpretation
- appellate procedure
- criminal procedure

PRACTICE AREAS

- criminal law
- appellate practice
- statutory interpretation

QUESTIONS PRESENTED

1. Whether 75 Pa.C.S. § 3334(a) applies to a motorist's failure to signal when exiting a parking lot and turning onto a roadway.
2. Whether the Commonwealth's appeal should be dismissed.

HOLDINGS

1. The relevant statutory signaling requirement applies to movements occurring 'upon' a roadway and does not apply to a motorist's action when turning from a parking lot onto that roadway.
2. The appeal should be dismissed.

KEY QUOTATIONS

“This case is an example of how poor draftsmanship and a maddening lack of clarity on the part of the General Assembly lead to a waste of judicial and law enforcement resources.” (2)

“Absent legislative revision of semi-coherent and often internally inconsistent statutes, police officers, lawyers, and judges alike are forced to guess at lawmakers’ meaning.” (2)

FACTUAL BACKGROUND

Monte Lowrey was charged with failing to use his vehicle's turn signal when exiting from a parking lot onto a roadway. The relevant statute provides that, '[u]pon a roadway,' a driver must signal before turning, changing lanes, or entering the traffic stream from a parked position. Justice Wecht agreed with the Superior Court's conclusion that the statute applies only to movements occurring upon a roadway, not to the motorist's action of turning onto the roadway.

PROCEDURAL HISTORY

Lowrey was charged with failing to use a vehicle turn signal when exiting a parking lot onto a roadway and was sentenced by the Bucks County Court of Common Pleas. The Superior Court, at No. 1297 EDA 2024, entered an order on March 12, 2025, vacating the judgment of sentence entered on April 3, 2024. The Commonwealth appealed to the Supreme Court of Pennsylvania, which dismissed the appeal.

DISPOSITION

dismissed

OPINION

WECHT, DAVID N., J, concurring.

[J-44-2026] IN THE SUPREME COURT OF PENNSYLVANIA MIDDLE DISTRICT COMMONWEALTH OF PENNSYLVANIA,: No. 57 MAP 2025 Appellant: Appeal from the Order of the: Superior Court at No. 1297 EDA: 2024, entered on March 12, 2025, v.: Vacating the Judgment of: Sentence of the Bucks County: Court of Common Pleas, Criminal MONTE LOWREY,: Division, at No. CP-09-CR-: 0001289-2023, entered on April Appellee: 3, 2024.:

ARGUED: May 20, 2026 CONCURRING STATEMENT JUSTICE WECHT FILED: June 18, 2026 In this case, appellee Monte Lowrey was charged with failure to use his vehicle's turn signal when exiting from a parking lot onto a roadway.

Because the relevant statute applies only to movements that occur “upon” a roadway, rather than actions that a motorist takes when turning onto that roadway, 1 the Superior Court reversed Lowrey’s judgment of sentence.

The Commonwealth appeals from that decision, and I agree with today’s order dismissing that appeal notwithstanding the efforts invested by many in briefing and argument. This case is an example of how poor draftsmanship and a maddening lack of clarity on the part of the General Assembly lead to a waste of judicial and law enforcement 1 See 75 Pa.C.S. § 3334(a) (“Upon a roadway no person shall turn a vehicle or move from one traffic lane to another or enter the traffic stream from a parked position unless and until the movement can be made with reasonable safety nor without giving an appropriate signal in the manner provided in this section.”). resources.

Absent legislative revision of semi-coherent and often internally inconsistent² statutes, police officers, lawyers, and judges alike are forced to guess at lawmakers’ meaning. Such guesswork devours time and money as debate ensues over the General Assembly’s failure to convey its instructions clearly. 2 Consider, for example, the fact that, while the statutory provision applies only “[u]pon a roadway”, it also addresses entry into “the traffic stream from a parked position.” 75 Pa.C.S. §3334(a).

[J-44-2026, 57 MAP 2025] - 2