

EXHIBIT 2



215 S. WASHINGTON SQUARE, SUITE 200
LANSING, MI 48933-1816
TELEPHONE: (517) 371-1730
FACSIMILE: (844) 670-6009
<http://www.dickinsonwright.com>

ROBERT P. YOUNG JR.
RYoung@dickinsonwright.com
(517) 487-4780

April 18, 2018

Hon. Ruth Johnson
Secretary of State
Michigan Department of State
430 W. Allegan St.
Lansing, MI 48909

Re: Voters Not Politicians Ballot Proposal

Dear Secretary Johnson:

We are counsel for Citizens Protecting Michigan's Constitution ("CPMC"), a ballot question committee that opposes the revision of the Michigan Constitution set forth in the petition filed by Voters Not Politicians ("VNP").

The proposal in VNP's petition (the "VNP Proposal"), if approved by voters, would delete, add, or amend language in eleven sections across three articles of the Michigan Constitution of 1963 ("Constitution"), effecting sweeping changes to all three branches of state government as well as the electoral process itself. It would add approximately 3,375 words to and strike approximately 1,459 words in the Constitution, which would make it the largest ballot-initiated revision to the Constitution since its 1963 adoption.

Not only is the VNP Proposal massive in size, it also makes significant and fundamental changes to the core structures of Michigan's government. Among other changes, it would create a 13 member "independent" redistricting commission in the legislative branch, replace existing mandatory redistricting criteria with new non-mandatory criteria, and transfer the existing authority over redistricting from all three branches of government exclusively to the commission. The Michigan Supreme Court has recognized that "[a]ny change in the means by which the members of the Legislature are chosen in is a fundamental matter." *In re Apportionment of State Legislature-1982*, 413 Mich 96, 136-137; 321 NW2d 565 (1982).

Due to the massive size of the petition and the sweeping changes it seeks to enact, it is not susceptible to submission to the voters. The Michigan Constitution of 1963 differentiates between "amendments," which are mere corrections of detail, and "revisions," which are greater and more fundamental changes and which can only be accomplished by constitutional convention. See Const 1963, art 12, §§ 2, 3; *Citizens Protecting Michigan's Constitution v Sec'y*, 280 Mich App 273, 277; 761 NW2d 210 (2008). Because the VNP Proposal constitutes a "revision" to the Michigan Constitution, it cannot be accomplished by ballot-initiative. The People deserve the

Hon. Ruth Johnson
April 18, 2018
Page 2

benefits of the study, deliberation, and recommendations of a constitutional convention *before* they are asked to approve or reject such changes.

Additionally, the petition circulated by VNP in support of their proposal omitted multiple sections of the existing Constitution that would be abrogated if the VNP Proposal is adopted. These include: article 1, § 5; article 6, § 13; article 9, § 17; and article 11, § 1. The electors signing the petition thus were not advised of these abrogated provisions. This is contrary to Michigan law—i.e., section 482 of the Michigan Election Code, MCL 168.482—which requires that petitions circulating a proposed amendment to the Constitution republish all provisions of the existing Constitution that would be abrogated if the amendment were to be adopted. *Protect Our Jobs v Bd of State Canvassers*, 492 Mich 763, 791-792; 822 NW2d 534 (2012).

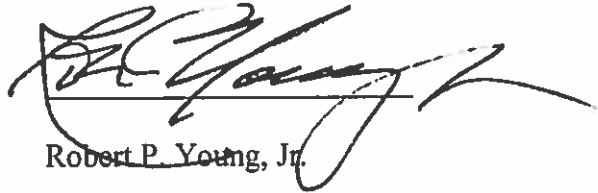
For each of these reasons, we believe that you have a clear legal duty to reject the petition filed by VNP, and to refuse to further process the petition or take any other action in furtherance of the VNP Proposal appearing on the 2018 General Election ballot.

In the event you do not agree, or in the event you do not intend otherwise to exercise your authority to reject the VNP Proposal, please advise us as soon as possible.

Thank you for your review.

Sincerely,

DICKINSON WRIGHT PLLC



Robert P. Young, Jr.

LANSING 37874-2 532298v2