

EXHIBIT C



DENNY HOSKINS, CPA

SECRETARY OF STATE
STATE OF MISSOURI

September 26, 2025

Richard von Glahn

RE: Rejection of first proposed referendum petition

Dear Mr. von Glahn:

Please be advised that the Secretary of State's office, pursuant to Section 116.332.4, RSMo, has rejected the form of your petition that was submitted to this office on September 12, 2025, following the Attorney General's recommendation. A copy of the Attorney General's Opinion Letter, 302-2025, is enclosed for your records.

In her Opinion Letter, the Attorney General stated one reason for the recommended rejection as to form. After reviewing the Attorney General's Opinion Letter, this office has determined that the sample petition sheet you submitted was insufficient as to form for the following reason:

The petition is not in the form prescribed by Section 116.030, RSMo.

For specific details as to this insufficiency in form, you may consult the enclosed Opinion Letter. Should you have any questions regarding this matter, please feel free to contact this office at (573) 751-2301 or (800) 669-8683.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Kirkpatrick".

Director of Elections

Enclosure



ATTORNEY GENERAL OF MISSOURI

CATHERINE L. HANAWAY

September 25, 2025

OPINION LETTER NO. 302-2025

The Honorable Denny Hoskins, CPA
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Hoskins:

This opinion letter responds to your request dated September 14, 2025 for our review under § 116.332, RSMo, of the sufficiency as to form of a referendum submitted on September 12, 2025 by Richard von Glahn, version 1 (2026-R001).

We conclude that the petition must be rejected as insufficient as to form, because the petition is not in the form prescribed by § 116.030, RSMo. Among the requirements to form contained in § 116.030, RSMo, is the requirement that the referendum petition be submitted “on any law” passed by the General Assembly. This requirement is reiterated in § 116.050, which provides, among other things, that the form of referendum petitions must “conform to the provisions of . . . Article III, Section 50 of the Constitution.” Article III, Section 50 allows only for either initiative petitions or referendum petitions on “laws” passed by the State of Missouri.

The referendum petition sample sheet purports to collect signatures for a referendum on House Bill No. 1 of the 103rd General Assembly, 2nd Extraordinary Session (“HB 1”). Article III, Section 31 of the Missouri Constitution provides, however, that a bill passed by the Missouri House of Representatives and Senate does not become “a law” until it is either “approved by the governor” or until the bill is not “returned by the governor within the time limits prescribed by this section.” HB 1 has not been signed by Governor Kehoe.

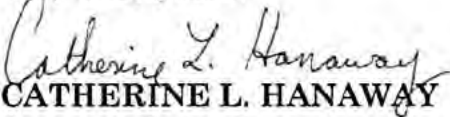
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Nor has time to return HB 1 expired. Article III, Section 31 makes clear that, because neither of these events have occurred, HB 1 is not currently a “law” under the Constitution and laws of Missouri. Consequently, the submitted referendum petition does not comply with the requirement to form that it refer to a “law” that the petition is seeking a referendum on, and it must therefore be rejected as insufficient to form.

Because of our rejection of the form of the petition for the reasons stated above, we have not reviewed the petition to determine whether additional deficiencies exist. Pursuant to § 116.332.4, RSMo, the Secretary of State is authorized to review this opinion and “make a final decision as to the approval or rejection of the form of the petition.”

Very truly yours,


CATHERINE L. HANAWAY
Attorney General



DENNY HOSKINS, CPA

SECRETARY OF STATE
STATE OF MISSOURI

September 26, 2025

Richard von Glahn



RE: Rejection of second proposed referendum petition

Dear Mr. von Glahn:

Please be advised that the Secretary of State's office, pursuant to Section 116.332.4, RSMo, has rejected the form of your petition that was submitted to this office on September 12, 2025, following the Attorney General's recommendation. A copy of the Attorney General's Opinion Letter, 303-2025, is enclosed for your records.

In her Opinion Letter, the Attorney General stated one reason for the recommended rejection as to form. After reviewing the Attorney General's Opinion Letter, this office has determined that the sample petition sheet you submitted was insufficient as to form for the following reason:

The petition is not in the form prescribed by Section 116.030, RSMo.

For specific details as to this insufficiency in form, you may consult the enclosed Opinion Letter. Should you have any questions regarding this matter, please feel free to contact this office at (573) 751-2301 or (800) 669-8683.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Kirkpatrick".

Director of Elections

Enclosure



ATTORNEY GENERAL OF MISSOURI

CATHERINE L. HANAWAY

September 25, 2025

OPINION LETTER NO. 303-2025

The Honorable Denny Hoskins, CPA
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Hoskins:

This opinion letter responds to your request dated September 14, 2025 for our review under § 116.332, RSMo, of the sufficiency as to form of a referendum submitted on September 12, 2025 by Richard von Glahn, version 2 (2026-R002).

We conclude that the petition must be rejected as insufficient as to form, because the petition is not in the form prescribed by § 116.030, RSMo. Among the requirements to form contained in § 116.030, RSMo, is the requirement that the referendum petition be submitted “on any law” passed by the General Assembly. This requirement is reiterated in § 116.050, which provides, among other things, that the form of referendum petitions must “conform to the provisions of . . . Article III, Section 50 of the Constitution.” Article III, Section 50 allows only for either initiative petitions or referendum petitions on “laws” passed by the State of Missouri.

The referendum petition sample sheet purports to collect signatures for a referendum on House Bill No. 1 of the 103rd General Assembly, 2nd Extraordinary Session (“HB 1”). Article III, Section 31 of the Missouri Constitution provides, however, that a bill passed by the Missouri House of Representatives and Senate does not become “a law” until it is either “approved by the governor” or until the bill is not “returned by the governor within the time limits prescribed by this section.” HB 1 has not been signed by Governor Kehoe. Nor has time to return HB 1 expired. Article III, Section

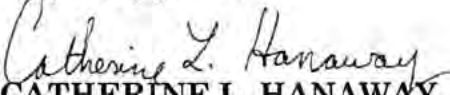
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31 makes clear that, because neither of these events have occurred, HB 1 is not currently a “law” under the Constitution and laws of Missouri. Consequently, the submitted referendum petition does not comply with the requirement to form that it refer to a “law” that the petition is seeking a referendum on, and it must therefore be rejected as insufficient to form.

Because of our rejection of the form of the petition for the reasons stated above, we have not reviewed the petition to determine whether additional deficiencies exist. Pursuant to § 116.332.4, RSMo, the Secretary of State is authorized to review this opinion and “make a final decision as to the approval or rejection of the form of the petition.”

Very truly yours,


CATHERINE L. HANAWAY
Attorney General



DENNY HOSKINS, CPA

SECRETARY OF STATE
STATE OF MISSOURI

September 26, 2025

Richard von Glahn
[REDACTED]

RE: Rejection of third proposed referendum petition

Dear Mr. von Glahn:

Please be advised that the Secretary of State's office, pursuant to Section 116.332.4, RSMo, has rejected the form of your petition that was submitted to this office on September 15, 2025, following the Attorney General's recommendation. A copy of the Attorney General's Opinion Letter, 304-2025, is enclosed for your records.

In her Opinion Letter, the Attorney General stated one reason for the recommended rejection as to form. After reviewing the Attorney General's Opinion Letter, this office has determined that the sample petition sheet you submitted was insufficient as to form for the following reason:

The petition is not in the form prescribed by Section 116.030, RSMo.

For specific details as to this insufficiency in form, you may consult the enclosed Opinion Letter. Should you have any questions regarding this matter, please feel free to contact this office at (573) 751-2301 or (800) 669-8683.

Sincerely,

Director of Elections

Enclosure



ATTORNEY GENERAL OF MISSOURI

CATHERINE L. HANAWAY

September 25, 2025

OPINION LETTER NO. 304-2025

The Honorable Denny Hoskins, CPA
Missouri Secretary of State
James C. Kirkpatrick State Information Center
600 West Main Street
Jefferson City, MO 65101

Dear Secretary Hoskins:

This opinion letter responds to your request dated September 14, 2025 for our review under § 116.332, RSMo, of the sufficiency as to form of a referendum submitted on September 12, 2025 by Richard von Glahn, version 3 (2026-R003).

We conclude that the petition must be rejected as insufficient as to form, because the petition is not in the form prescribed by § 116.030, RSMo. Among the requirements to form contained in § 116.030, RSMo, is the requirement that the referendum petition be submitted "on any law" passed by the General Assembly. This requirement is reiterated in § 116.050, which provides, among other things, that the form of referendum petitions must "conform to the provisions of . . . Article III, Section 50 of the Constitution." Article III, Section 50 allows only for either initiative petitions or referendum petitions on "laws" passed by the State of Missouri.

The referendum petition sample sheet purports to collect signatures for a referendum on House Bill No. 1 of the 103rd General Assembly, 2nd Extraordinary Session ("HB 1"). Article III, Section 31 of the Missouri Constitution provides, however, that a bill passed by the Missouri House of Representatives and Senate does not become "a law" until it is either "approved by the governor" or until the bill is not "returned by the governor within the time limits prescribed by this section." HB 1 has not been signed by Governor

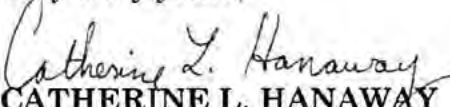
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Kehoe. Nor has time to return HB 1 expired. Article III, Section 31 makes clear that, because neither of these events have occurred, HB 1 is not currently a “law” under the Constitution and laws of Missouri. Consequently, the submitted referendum petition does not comply with the requirement to form that it refer to a “law” that the petition is seeking a referendum on, and it must therefore be rejected as insufficient to form.

Because of our rejection of the form of the petition for the reasons stated above, we have not reviewed the petition to determine whether additional deficiencies exist. Pursuant to § 116.332.4, RSMo, the Secretary of State is authorized to review this opinion and “make a final decision as to the approval or rejection of the form of the petition.”

Very truly yours,


CATHERINE L. HANAWAY
Attorney General