

HB 1	117
991	<u>Block: 290950140081017</u>
992	<u>Block: 290950140081018</u>
993	<u>Block: 290950140081019</u>
994	<u>Block: 290950140082004</u>
995	<u>Block: 290950140082005</u>
996	<u>Block: 290950141281023</u>
997	<u>Block: 290950141281030</u>
998	<u>VTD Sni-A-Bar 41 Subtotal</u>
999	<u>VTD: Sni-A-Bar 42</u>
1000	<u>VTD: Sni-A-Bar 43</u>
1001	<u>VTD: Sni-A-Bar 44</u>
1002	<u>VTD: Sni-A-Bar 45</u>
1003	<u>Block: 290950140021021</u>
1004	<u>Block: 290950140051020</u>
1005	<u>Block: 290950140051021</u>
1006	<u>Block: 290950140051022</u>
1007	<u>Block: 290950140051023</u>
1008	<u>Block: 290950140051024</u>
1009	<u>Block: 290950140051025</u>
1010	<u>Block: 290950140051026</u>
1011	<u>Block: 290950140051029</u>
1012	<u>Block: 290950140051030</u>
1013	<u>Block: 290950140051031</u>
1014	<u>Block: 290950140051032</u>
1015	<u>Block: 290950140051033</u>
1016	<u>Block: 290950140051034</u>
1017	<u>Block: 290950140051038</u>
1018	<u>Block: 290950140051043</u>
1019	<u>Block: 290950140051044</u>
1020	<u>Block: 290950140054011</u>
1021	<u>Block: 290950140054012</u>
1022	<u>Block: 290950140054013</u>
1023	<u>Block: 290950140054014</u>
1024	<u>Block: 290950140054017</u>
1025	<u>VTD Sni-A-Bar 45 Subtotal</u>
1026	<u>VTD: Sni-A-Bar 46</u>
1027	<u>VTD: Sni-A-Bar 47</u>

HB 1	118
1028	<u>VTD: Sni-A-Bar 48</u>
1029	<u>VTD: Sni-A-Bar 49</u>
1030	<u>VTD: Sni-A-Bar 50</u>
1031	<u>VTD: Sni-A-Bar 51</u>
1032	<u>VTD: Sni-A-Bar 52</u>
1033	<u>County Jackson MO Subtotal</u>
1034	<u>County: Johnson MO</u>
1035	<u>County: Lafayette MO</u>
1036	<u>County: Maries MO</u>
1037	<u>County: Miller MO</u>
1038	<u>County: Moniteau MO</u>
1039	<u>County: Morgan MO</u>
1040	<u>County: Osage MO</u>
1041	<u>County: Pettis MO</u>
1042	<u>County: Randolph MO</u>
1043	<u>County: Saline MO</u>
1044	<u>District 5 Total</u>
	<u>128.476. The sixth congressional district shall be composed of the following:</u>
2	<u>County: Adair MO</u>
3	<u>County: Andrew MO</u>
4	<u>County: Atchison MO</u>
5	<u>County: Buchanan MO</u>
6	<u>County: Caldwell MO</u>
7	<u>County: Carroll MO</u>
8	<u>County: Chariton MO</u>
9	<u>County: Clark MO</u>
10	<u>County: Clay MO</u>
11	<u>County: Clinton MO</u>
12	<u>County: Daviess MO</u>
13	<u>County: DeKalb MO</u>
14	<u>County: Gentry MO</u>
15	<u>County: Grundy MO</u>
16	<u>County: Harrison MO</u>
17	<u>County: Holt MO</u>
18	<u>County: Jackson MO</u>
19	<u>VTD: KC 1101</u>
20	<u>Block: 290950003001001</u>

HB 1 Official Court Document Not an Official Court Document Not an Official Court Document Not an Official Court Document

21 Block: 290950003001002  
 22 Block: 290950003001003  
 23 Block: 290950003001004  
 24 Block: 290950003001005  
 25 Block: 290950003001006  
 26 Block: 290950003001007  
 27 Block: 290950003001008  
 28 Block: 290950003001009  
 29 Block: 290950003001010  
 30 Block: 290950003001021  
 31 Block: 290950003002001  
 32 Block: 290950003002002  
 33 Block: 290950003002006  
 34 Block: 290950003002007  
 35 Block: 290950003002008  
 36 Block: 290950003002009  
 37 Block: 290950003002010  
 38 Block: 290950003002011  
 39 Block: 290950003003000  
 40 Block: 290950003003001  
 41 Block: 290950003003002  
 42 Block: 290950003003003  
 43 Block: 290950003003004  
 44 Block: 290950003003005  
 45 Block: 290950003003006  
 46 Block: 290950003003007  
 47 Block: 290950003003008  
 48 Block: 290950003003009  
 49 Block: 290950003003012  
 50 Block: 290950003003013  
 51 Block: 290950003003014  
 52 Block: 290950003003017  
 53 Block: 290950003003018  
 54 Block: 290950003003019  
 55 Block: 290950003003023  
 56 Block: 290950003003027  
 57 VTD KC 1101 Subtotal

HB 1 120

58 VTD: KC 1102  
 59 VTD: KC 1103  
 60 VTD: KC 1104  
 61 VTD: KC 1105  
 62 VTD: KC 1106  
 63 VTD: KC 1107  
 64 VTD: KC 1109  
 65 VTD: KC 1110  
 66 VTD: KC 1111  
 67 VTD: KC 1113  
 68 VTD: KC 1114  
 69 VTD: KC 1201  
 70 Block: 290950007002002  
 71 Block: 290950007002003  
 72 Block: 290950007002010  
 73 Block: 290950007002011  
 74 Block: 290950008001000  
 75 Block: 290950008001001  
 76 Block: 290950008001002  
 77 Block: 290950008001003  
 78 Block: 290950008001004  
 79 Block: 290950008001006  
 80 Block: 290950008001007  
 81 Block: 290950008003000  
 82 Block: 290950008003001  
 83 Block: 290950008003002  
 84 Block: 290950008003003  
 85 Block: 290950008003004  
 86 VTD KC 1201 Subtotal  
 87 VTD: KC 1202  
 88 VTD: KC 1203  
 89 VTD: KC 1204  
 90 VTD: KC 1312  
 91 VTD: KC 216  
 92 County Jackson MO Subtotal  
 93 County: Knox MO  
 94 County: Lewis MO

11B 1 121

95 County: Linn MO  
 96 County: Livingston MO  
 97 County: Macon MO  
 98 County: Marion MO  
 99 County: Mercer MO  
 100 County: Nodaway MO  
 101 County: Platte MO  
 102 County: Putnam MO  
 103 County: Ray MO  
 104 County: Schuyler MO  
 105 County: Scotland MO  
 106 County: Shelby MO  
 107 County: Sullivan MO  
 108 County: Worth MO  
 109 District 6 Total  
128,477. The seventh congressional district shall be composed of the following:  
 2 County: Barry MO  
 3 County: Christian MO  
 4 County: Greene MO  
 5 County: Jasper MO  
 6 County: Lawrence MO  
 7 County: McDonald MO  
 8 County: Newton MO  
 9 County: Stone MO  
 10 County: Taney MO  
 11 County: Webster MO  
 12 VTD: Benton  
 13 VTD: Diggins  
 14 VTD: Finley  
 15 VTD: Fordland  
 16 VTD: Grant  
 17 Block: 292254701022060  
 18 Block: 292254701022062  
 19 VTD Grant Subtotal  
 20 VTD: Hazelwood  
 21 VTD: Northview B  
 22 Block: 292254703022008

11B 1

122

23 Block: 292254703022012  
 24 Block: 292254703022013  
 25 Block: 292254703022014  
 26 Block: 292254703022030  
 27 Block: 292254703022031  
 28 Block: 292254703022032  
 29 Block: 292254703022033  
 30 Block: 292254703022034  
 31 Block: 292254703022035  
 32 Block: 292254703023007  
 33 Block: 292254703023008  
 34 Block: 292254703023009  
 35 Block: 292254703023010  
 36 Block: 292254703023011  
 37 Block: 292254703023012  
 38 Block: 292254703023013  
 39 Block: 292254703023028  
 40 Block: 292254703023029  
 41 Block: 292254703023030  
 42 Block: 292254703023031  
 43 Block: 292254703023032  
 44 Block: 292254703023035  
 45 Block: 292254703023036  
 46 Block: 292254703023037  
 47 Block: 292254703023038  
 48 Block: 292254703023039  
 49 Block: 292254703023040  
 50 Block: 292254703023041  
 51 Block: 292254703023042  
 52 Block: 292254703023046  
 53 Block: 292254703023047  
 54 Block: 292254703023048  
 55 Block: 292254703023049  
 56 Block: 292254703023050  
 57 Block: 292254703023051  
 58 Block: 292254703023052  
 59 Block: 292254703023053



HB 123

60 Block: 292254703023054  
 61 Block: 292254703023055  
 62 Block: 292254703023062  
 63 Block: 292254703023063  
 64 Block: 292254703023069  
 65 Block: 292254703023074  
 66 Block: 292254703023079  
 67 VTD Northview B Subtotal  
 68 County Webster MO Subtotal  
 69 District 7 Total  
 128,478. The eighth congressional district shall be composed of the following:  
 2 County: Bollinger MO  
 3 County: Butler MO  
 4 County: Cape Girardeau MO  
 5 County: Carter MO  
 6 County: Dent MO  
 7 County: Douglas MO  
 8 County: Dunklin MO  
 9 County: Howell MO  
 10 County: Iron MO  
 11 County: Jefferson MO  
 12 VTD: Airport  
 13 VTD: American Legion  
 14 VTD: Antonia  
 15 VTD: Arnold W-1  
 16 VTD: Arnold W-2  
 17 VTD: Arnold W-3  
 18 VTD: Arnold W-4  
 19 VTD: Athena  
 20 VTD: Barnhart  
 21 VTD: Brennan  
 22 Block: 290997002101000  
 23 Block: 290997002101015  
 24 Block: 290997002111000  
 25 Block: 290997002111001  
 26 Block: 290997002111002  
 27 Block: 290997002111005

HB 1

124

28 Block: 290997002111006  
 29 Block: 290997002111007  
 30 Block: 290997002111008  
 31 Block: 290997002111010  
 32 Block: 290997002111011  
 33 Block: 290997003031000  
 34 Block: 290997003031001  
 35 Block: 290997003031002  
 36 Block: 290997003031003  
 37 Block: 290997003031004  
 38 Block: 290997003031005  
 39 Block: 290997003031006  
 40 Block: 290997003031007  
 41 Block: 290997003031008  
 42 Block: 290997003031009  
 43 Block: 290997003031010  
 44 Block: 290997003031011  
 45 Block: 290997003031012  
 46 Block: 290997003031013  
 47 Block: 290997003031014  
 48 Block: 290997003031015  
 49 Block: 290997003031016  
 50 Block: 290997003032000  
 51 Block: 290997003032001  
 52 Block: 290997003032002  
 53 Block: 290997003032003  
 54 Block: 290997003032004  
 55 Block: 290997003032005  
 56 Block: 290997003032006  
 57 Block: 290997003032007  
 58 Block: 290997003032008  
 59 Block: 290997003032009  
 60 Block: 290997003032010  
 61 Block: 290997003032011  
 62 Block: 290997003032012  
 63 Block: 290997003032013  
 64 Block: 290997003032014

Not an Official Court Document Not an Official Court Document Not an Official Court Document Not an Official Court Document

HB 1

125

65 Block: 290997003032015 Not an Official Court Document Not an Official Court Document  
 66 Block: 290997003033000  
 67 Block: 290997003033001  
 68 Block: 290997003033002 Not an Official Court Document Not an Official Court Document  
 69 Block: 290997003033003  
 70 Block: 290997003033004 Not an Official Court Document Not an Official Court Document Not an Official Court Document  
 71 Block: 290997003033005  
 72 Block: 290997003033006  
 73 Block: 290997003033007 Not an Official Court Document Not an Official Court Document Not an Official Court Document  
 74 Block: 290997003033008  
 75 Block: 290997003033009 Not an Official Court Document Not an Official Court Document Not an Official Court Document  
 76 Block: 290997003033010  
 77 Block: 290997003033011  
 78 Block: 290997003033012 Not an Official Court Document Not an Official Court Document Not an Official Court Document  
 79 Block: 290997003033013  
 80 Block: 290997003033014 Not an Official Court Document Not an Official Court Document Not an Official Court Document  
 81 Block: 290997003033015  
 82 Block: 290997003033016  
 83 Block: 290997003033017 Not an Official Court Document Not an Official Court Document Not an Official Court Document  
 84 Block: 290997003033018  
 85 Block: 290997003033019 Not an Official Court Document Not an Official Court Document Not an Official Court Document  
 86 Block: 290997003051000  
 87 Block: 290997003052000  
 88 Block: 290997003052026  
 89 VTD: Brennan Subtotal  
 90 VTD: Crystal City W-1  
 91 VTD: Crystal City W-2  
 92 VTD: Crystal City W-3  
 93 VTD: Crystal City W-4  
 94 VTD: Festus Outside  
 95 VTD: Festus W-1  
 96 VTD: Festus W-2  
 97 VTD: Festus W-3  
 98 VTD: Festus W-4  
 99 VTD: Flamm City  
 100 VTD: Hematite  
 101 VTD: Herculaneum

HB 1

126

102 VTD: Herculaneum W-2  
 103 VTD: Herculaneum W-3  
 104 VTD: Imperial  
 105 VTD: Imperial 2  
 106 VTD: Jefferson Heights  
 107 VTD: Jefferson R7  
 108 VTD: Kimmswick W-1  
 109 VTD: Lonedell  
 110 VTD: Mapaville  
 111 VTD: Marble Springs  
 112 VTD: Mastodon  
 113 VTD: Maxville  
 114 VTD: Meramec Heights  
 115 VTD: Miller  
 116 VTD: Murphy  
 117 VTD: North Jefferson  
 118 Block: 290997002112008  
 119 Block: 290997002112009  
 120 Block: 290997002112010  
 121 Block: 290997002112011  
 122 Block: 290997002112012  
 123 Block: 290997002112013  
 124 Block: 290997002112014  
 125 Block: 290997002112015  
 126 Block: 290997002112016  
 127 VTD North Jefferson Subtotal  
 128 VTD: Oakvale  
 129 VTD: Olympian Village  
 130 VTD: Otto  
 131 VTD: Pevely W-1  
 132 VTD: Pevely W-2  
 133 VTD: Pevely W-3  
 134 VTD: Pevely W-4  
 135 VTD: Platin  
 136 VTD: Riverview  
 137 VTD: Rock Creek  
 138 VTD: Rock Creek 1

HB 1 127

HB 1 128

139 VTD: Romaine Creek  
 140 VTD: Saline  
 141 VTD: Springdale  
 142 VTD: Sunrise  
 143 VTD: Valle  
 144 Block: 290997012006056  
 145 Block: 290997013002004  
 146 Block: 290997013002005  
 147 Block: 290997013002006  
 148 Block: 290997013003000  
 149 Block: 290997013003001  
 150 Block: 290997013003002  
 151 Block: 290997013003012  
 152 Block: 290997013003026  
 153 Block: 290997014012007  
 154 Block: 290997014012012  
 155 VTD Valle Subtotal  
 156 VTD: Victoria  
 157 Block: 290997010021006  
 158 Block: 290997010021008  
 159 Block: 290997010021019  
 160 Block: 290997010021021  
 161 Block: 290997010023004  
 162 Block: 290997010023005  
 163 Block: 290997010023006  
 164 Block: 290997010023012  
 165 Block: 290997010023013  
 166 Block: 290997010023029  
 167 Block: 290997010023030  
 168 Block: 290997010023035  
 169 VTD Victoria Subtotal  
 170 VTD: Windsor  
 171 County Jefferson MO Subtotal  
 172 County: Madison MO  
 173 County: Mississippi MO  
 174 County: New Madrid MO  
 175 County: Oregon MO

176 County: Ozark MO  
 177 County: Pemiscot MO  
 178 County: Perry MO  
 179 County: Phelps MO  
 180 County: Reynolds MO  
 181 County: Ripley MO  
 182 County: Scott MO  
 183 County: Shannon MO  
 184 County: St. Francois MO  
 185 County: Ste. Genevieve MO  
 186 County: Stoddard MO  
 187 County: Texas MO  
 188 County: Wayne MO  
 189 County: Wright MO  
 190 District 8 Total

128.479. Upon the passage and enactment of sections 128.471 to 128.478, and as  
 2 provided to the revisor of statutes, the revisor of statutes shall publish the graphical map  
 3 representation of the official congressional district boundaries as an appendix of the  
 4 Revised Statutes of Missouri.

✓

WRIT  
EXHIBIT 17

**WRIT**

**EXHIBIT 17**



# EXHIBIT 13





DENNY HOSKINS, CPA

SECRETARY OF STATE  
STATE OF MISSOURI

October 14, 2025

Richard von Glahn

9 Wilshire Terrace

Webster Groves, MO 63119

RE: Approval as to form of referendum petition regarding House Bill No. 1 (103<sup>rd</sup> General Assembly, 2<sup>nd</sup> Extraordinary Session) (2026-R004)

Dear Mr. von Glahn:

Please be advised that the Secretary of State, pursuant to Section 116.332.4, RSMo, has approved the form of your submitted referendum petition. This approval signifies that the petition complies with the technical requirements of Chapter 116 governing petition format, page layout, and affidavit language. A copy of the Attorney General's letter approving form is enclosed for your records.

Please note, however, that this approval is limited to form only. Under Sections 116.120 and 116.332, RSMo, and the Missouri Supreme Court's decision in *No Bans on Choice v. Ashcroft*, 638 S.W.3d 484 (Mo. banc 2022), the Secretary of State has an ongoing duty to ensure that referendum petitions comply with the constitutional and statutory prerequisites set forth in Article III, Sections 49 and 52(a) of the Missouri Constitution and Chapter 116.

Consistent with *No Bans on Choice*, proponents may begin circulating a referendum petition for signatures immediately upon approval as to form. However, after circulation and upon submission of signatures, the Secretary of State must examine the petition to determine whether it "complies with the Constitution and with this chapter." § 116.120.1, RSMo. If statutory or constitutional deficiencies become apparent during verification or before certification—such as failure to meet signature thresholds, improper timing under Article III, Section 52(a), or defects affecting the validity of the referendum—the Secretary may decline to certify the petition for placement on the ballot. Any such determination remains subject to judicial review.

Should you have any questions regarding this matter, please contact our office at (573) 751-2301 or (800) 669-8683.

Sincerely,

Director of Elections

Enclosure

James C. Kirkpatrick State Information Center

Elections Division • PO Box 1767 • Jefferson City, Missouri 65102 • (573) 751-2301

Administrative Rules • Business Services • Elections • Publications • Securities • State Archives • State Library • Wolfner Library

Writ Exhibits - Page 537



ATTORNEY GENERAL OF MISSOURI

CATHERINE L. HANAWAY

October 9, 2025

OPINION LETTER NO. 314-2025

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 29, 2025, for our review under § 116.332, RSMo, of the sufficiency as to form of a referendum petition for House Bill No. 1 (103<sup>rd</sup> General Assembly, 2<sup>nd</sup> Extraordinary Session) submitted by Richard von Glahn, version 4 (2026-R004).

We approve the petition as to form, but § 116.332 gives the Secretary of State final authority to approve or reject the petition. Therefore, our approval of the form of the petition does not preclude you from rejecting the petition.

Because our review of the petition is simply for the purpose of determining sufficiency as to form, the fact that we do not reject the petition is not to be construed as a determination that the petition is sufficient as to substance. Likewise, because our review is mandated by statute, no action that we take with respect to such review should be construed as an endorsement of the petition or of the objectives of its proponents, or the expression of any view respecting the adequacy or inadequacy of the petition generally.

Very truly yours,

*Catherine L. Hanaway*  
CATHERINE L. HANAWAY  
Attorney General

OP-2025-333

# WRIT EXHIBIT 18

# EXHIBIT 14





# Denny Hoskins, CPA

## Missouri Secretary of State

Media

FOR IMMEDIATE RELEASE

October 15, 2025

### Secretary of State Approves Redistricting Referendum for Circulation

Missouri Secretary of State Denny Hoskins announced that a referendum petition seeking to repeal recently enacted redistricting legislation has been approved for circulation.

The Secretary's approval authorizes the sponsor to begin collecting signatures from registered Missouri voters. Under Missouri law, no signatures gathered before this approval date are valid, and doing so constitutes a misdemeanor election offense.

"The process is clear," said Secretary Hoskins. "Every Missourian deserves confidence that ballot measures follow the law — not out-of-state agendas or confusion campaigns. Missouri values fairness and integrity, and this process reflects that."

The referendum, submitted under 2026-R004, seeks to refer to voters a bill passed during the 2025 Second Extraordinary Special Session of the Missouri General Assembly. The full text of the measure, the official ballot title, and the approved circulator instructions are available on the Secretary of State's website at [www.sos.mo.gov/elections/petitions](http://www.sos.mo.gov/elections/petitions).

To qualify for the November 2026 general election ballot, proponents must collect signatures from at least 5% of registered voters in six of Missouri's eight congressional districts by the statutory deadline.

"This office remains committed to transparency, accuracy, and protecting Missouri voters' trust in the democratic process," Hoskins said.

The approval packet has been attached for reference.

### About the Missouri Secretary of State's Office

The Secretary of State's Office oversees Missouri's elections, business registrations, securities, and state libraries and archives. For more information on the petition process, visit [sos.mo.gov/elections](http://sos.mo.gov/elections).

[2026-R004 Approval Packet.pdf](#)

# WRIT EXHIBIT 19

# EXHIBIT 15



# Denny Hoskins, CPA

## Missouri Secretary of State

Media

### FOR IMMEDIATE RELEASE

October 16, 2025

### Statement from Secretary of State Denny Hoskins Regarding Referendum Petitions

"Our office's duty is to uphold both the Constitution and the statutes that protect the integrity of Missouri's elections," said Secretary Hoskins. "We will continue to defend every citizen's right to petition their government—while also ensuring that those who deliberately commit fraud or forgery in the process are held accountable. Allowing out-of-state individuals to abuse the process and cheat undermines Missouri citizen's power in our political process."

The right of Missourians to speak freely and to petition their government is fundamental. Merely advocating for or discussing a referendum, or engaging with others about potential ballot issues, is not a crime and never has been. Nor is seeking signatures before the proposed referendum is approved as to form—even if those signatures cannot be counted due to noncompliance with statutory rules. The Secretary of State fully supports Missourians' constitutional rights to express their opinions and to organize around issues of public concern.

Recent statements from the Office have focused not on restricting that right, but on reminding the public of the specific criminal offenses that may occur during the signature-gathering phase of a referendum petition once circulation begins under Missouri law.

Those offenses—defined in Chapters 115 and 116 of the Missouri Revised Statutes—include:

- Signing a petition using any name other than one's own;
- Knowingly signing more than once for the same measure or election;
- Signing a petition while not a registered Missouri voter;
- Falsifying or forging signatures;
- Submitting petition sheets known to contain false or invalid signatures;
- Accepting or offering money or anything of value in exchange for a signature;
- Falsely swearing to a circulator's affidavit or notarization; and
- Knowingly filing false withdrawal or affidavit statements.

"Every Missourian has the right to advocate, sign, and participate—but no one has the right to cheat," Hoskins said. "If any citizen witnesses violations of these laws in the field, they can report them at: [https://www.sos.mo.gov/elections/elections\\_integrity](https://www.sos.mo.gov/elections/elections_integrity)."

Each of these actions is a violation of state election law and may carry criminal penalties. The following table summarizes the applicable statutes and classifications:

Statute	Offense	Class / Penalty
§ 116.030 / .040	False or multiple signatures on petition	Class A Misdemeanor



<b>Statute</b>	<b>Offense</b>	<b>Class / Penalty</b>
§ 116.080	False circulator affidavit / forgery history	Class A Misdemeanor
§ 116.090	Petition signature fraud (false names, forged sheets, payments)	Class A Misdemeanor
§ 116.110	False signature-withdrawal statement	Class A Misdemeanor
§§ 115.631 – 115.637	False oath, bribery, intimidation, or election fraud (acts connected with suffrage)	Class One – Class Three Election Offense (Felony to Misdemeanor depending on conduct)
§ 115.639	Interfering with an employee's right to vote (three hours off work)	Class Four Election Offense (Misdemeanor)

The Secretary emphasized that transparency, accuracy, and lawful participation remain the guiding principles of the referendum and initiative processes.

If any Missouri citizen witnesses potential violations of these laws in the field, they are encouraged to report them at [www.sos.mo.gov/elections/elections\\_integrity](http://www.sos.mo.gov/elections/elections_integrity).

For additional information about Missouri's referendum petition procedures, visit [www.sos.mo.gov/elections/petitions](http://www.sos.mo.gov/elections/petitions).

# WRIT EXHIBIT 20

1 IN THE CIRCUIT COURT OF MISSOURI  
2 COLE COUNTY, DIVISION 4  
3 HONORABLE CHRISTOPHER K. LIMBAUGH

4 PEOPLE NOT POLITICIANS, )  
5 )  
6 and )  
7 ) Case No. 25AC-CC07128  
8 RICHARD VON GLAHN, )  
9 Plaintiffs, )  
10 vs. )  
11 MISSOURI SECRETARY OF STATE )  
12 DENNY HOSKINS, )  
13 Defendant. )

14 TRANSCRIPT OF PROCEEDINGS  
15 12-08-2025

16  
17 On December 8, 2025, the above cause came on for  
18 hearing before the HONORABLE CHRISTOPHER K. LIMBAUGH,  
19 Judge of Division 4 of the Circuit Court of Cole County,  
20 Missouri, in Jefferson City.

21  
22  
23  
24 Candice K. Perez, Certified Court Reporter  
25 Official Court Reporter, Division 9, 16th Judicial Circuit,  
Kansas City

A P P E A R A N C E S

1  
2  
3 Plaintiff, PEOPLE NOT POLITICIANS, et al, is represented by:  
4 CHARLES W. HATFIELD and  
5 GRETA BAX  
6 STINSON LLP  
7 230 West McCarty Street,  
8 Jefferson City, Missouri 65101  
9 chuck.hatfield@stinson.com  
10 alix.cossette@stinson.com  
11 573-636-6263

12  
13 Respondent, MISSOURI SECRETARY OF STATE DENNY HOSKINS, is  
14 represented by:  
15 WILLIAM JAMES SEIDLECK and  
16 JACQUELINE BRYANT  
17 MISSOURI ATTORNEY GENERAL'S OFFICE  
18 815 Olive Street, Suite 200  
19 St. Louis, Missouri 63101  
20 graham.miller@ago.mo.gov  
21 314-340-7652

22  
23 Intervenor, PUT MISSOURI FIRST, is represented by:  
24 MARC ELLINGER and  
25 STEPHANIE BELL  
26 Ellinger Bell LLC  
27 308 East High Street, Suite 300  
28 Jefferson City, Missouri 65101  
29 mellinger@ellingerlaw.com  
30 573-750-4100



1	Index	
2		Page
3	Monday, December 08, 2025	
4	BENCH TRIAL	
5	Plaintiff's Evidence	18
6	Plaintiff rests	23
7	Defense Evidence	23
8	Defense Rests	23
9	Intervenor's Evidence	23
10	Chrissy Peters	
11	Direct Examination by Mr. Ellinger	
12	24	
13	Cross-Examination by Mr. Hatfield	
14	53	
15	Redirect by Mr. Ellinger	
16	82	
17	Recross by Mr. Hatfield	
18	89	
19	Intervenor Rests	98
20	Plaintiffs' Argument	95
21	Defendant's Argument	112
22	Intervenor's Argument	128
23	Trial concluded	136
24	Reporter's Certificate	137
25		

1	<u>PLAINTIFF EXHIBITS</u>		
2	Plaintiffs'	Description	Offered Received
3	Exhibit No. 1	(Make Your Voice Heard)	18 19
4	Exhibit No. 2	(House Bill 1)	18 19
5	Exhibit No. 3	(Journal of the Senate)	18 19
6	Exhibit No. 4	(2026-R001)	18 19
7	Exhibit No. 5	(2026-R002)	18 19
8	Exhibit No. 6	(September letter)	18 19
9	Exhibit No. 7	(September letter No. 2)	18 19
10	Exhibit No. 8	(2026-R003)	18 19
11	Exhibit No. 9	(September letter No. 3)	18 19
12	Exhibit No. 10	(September letter No. 4)	18 19
13	Exhibit No. 11	(Rejection letter)	18 19
14	Exhibit No. 12	(2026-R004)	18 19
15	Exhibit No. 13	(Approval letter)	18 19
16	Exhibit No. 14	(Press release)	18 19
17	Exhibit No. 15	(Press release)	18 19
18	Exhibit No. 16	(Amended joint stip.)	19 23
19	Exhibit No. 17	(Amended joint stip.)	19 23

20

21

22

23

24

25

1 Court Document Not an Official Court Document Not an Official Court Document Not an O  
2 DEFENDANT EXHIBITS

3 Official Court Document Not an Official Court Document Not an Official Court Document

4 Not an Official Court Document Not an Official Court Document Not an Official Court Do

5 Document Not an Official Court Document Not an Official Court Document Not an Official

6 al Court Document Not an Official Court Document Not an Official Court Document Not an

7 an Official Court Document Not an Official Court Document Not an Official Court Document

8 Not an Official Court Document Not an Official Court Document Not an Official Court D

9 (No exhibits marked.)

10 Document Not an Official Court Document Not an Official Court Document Not an Official

11 al Court Document Not an Official Court Document Not an Official Court Document Not

12 an Official Court Document Not an Official Court Document Not an Official Court Document

13 Not an Official Court Document Not an Official Court Document Not an Official Court

14 Document Not an Official Court Document Not an Official Court Document Not an Official

15 al Court Document Not an Official Court Document Not an Official Court Document Not

16 an Official Court Document Not an Official Court Document Not an Official Court Document

17 Not an Official Court Document Not an Official Court Document Not an Official Court

18 Document Not an Official Court Document Not an Official Court Document Not an Official

19 al Court Document Not an Official Court Document Not an Official Court Document Not

20 an Official Court Document Not an Official Court Document Not an Official Court Document

21 Not an Official Court Document Not an Official Court Document Not an Official Court Docu

22

23

24

25

1	<u>INTERVENOR EXHIBITS</u>	
2	Intervenor's Description	Offered Received
3	Exhibit A (Certificate of sufficiency)	36 37
4	Exhibit B (Certificate of insufficiency)	36 37
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		



1 12/08/2025

2 THE COURT: Court calls case No. 25AC-CC07128. This  
3 is People Not Politicians versus Hoskins. Will the attorneys  
4 please introduce themselves and whom they represent.

5 MR. HATFIELD: Afternoon, Your Honor. For the  
6 plaintiffs, Chuck Hatfield and Greta Bax.

7 MR. SEIDLECK: Mr. Seidleck on behalf of the state  
8 defendant.

9 MS. BRYANT: Judge, Jaqueline Bryant on behalf of  
10 defendant Secretary Hoskins.

11 MR. ELLINGER: Marc Ellinger and Stephanie Bell on  
12 behalf of the Intervenor, Put Missouri First.

13 THE COURT: And we're here today for a bench trial on  
14 this matter; however, it's come to the Court's attention there  
15 might be a few pretrial matters we need to take up. So I'll  
16 ask for the plaintiffs first. Is there anything preliminary  
17 for the plaintiffs?

18 MR. HATFIELD: No, Your Honor. The Plaintiffs are  
19 ready for trial.

20 THE COURT: Is there anything preliminary for the  
21 defendants?

22 MR. SEIDLECK: No. Not for the -- the state, Your  
23 Honor.

24 MR. ELLINGER: For the intervenor, yes. We do have a  
25 preliminary matter.

1 THE COURT: Go ahead, sir.

2 MR. ELLINGER: So I guess I'll go back to where I was

3 before. The last time we were in front of you, there were a

4 number of motions. And-- and maybe just by virtue of kind of

5 going back and talking about the status of this -- on November

6 13<sup>th</sup>, intervenors got in the case and immediately filed

7 discovery to the Plaintiffs. We appeared in front of you on

8 November 18<sup>th</sup>, and at that time, the Plaintiffs said that

9 they would respond by the end of that week, November 21. When

10 they responded, as you may recall, they filed a motion of a

11 protective order, we filed a motion to compel. We had those

12 arguments last week, you ruled on them, you denied their

13 protective order, granted our motion to compel.

14 We've been diligently waiting for the documents to

15 arrive, and this morning, I think it was still morning,

16 but maybe two hours before the hearing, we received the

17 responses. Their responses are, we are not going to give

18 you anything. Worse than that with respect to the

19 signature pages, which was the issue that we spent the

20 predominance of the time arguing over, they said they're

21 going to turn them into the Secretary of State's office

22 sometime in the future -- later this week probably, I

23 assume -- and that we can get them in the normal course of

24 business with the Secretary of State.

25 So as a result, we've received zero documents; even

1           though we have only submitted I think eight requests or  
2           maybe ten requests for production of documents. They  
3           further didn't supplement any substantive detail in their  
4           interrogatory answers, but I think the documents are more  
5           important.

6           So, Judge, I would like to move for sanctions. I'll  
7           hand you a copy of this motion. As this Court knows,  
8           compliance with discovery is -- is required under our  
9           rules. There are consequences for not complying with  
10          discovery, and particularly the brazenness of refusing to  
11          comply with discovery even though there is a motion to  
12          compel sustained by this Court.

13          Pursuant to the rules, and we've cited them in here,  
14          Rule 6101(b), sanction is striking of pleadings. And  
15          we've cited a number of cases. There's -- there's a ton  
16          of law out there on this, Judge. If somebody refuses to  
17          comply with discovery after a motion to compel is issued,  
18          then the appropriate sanction is to strike their

19          pleadings. So we would move that you strike their  
20          pleadings, and that would require, since they have no  
21          pleadings on file, judgment to be entered for the  
22          Defendants and the Plaintiff -- excuse me -- and the  
23          Intervenors on the claims.

24                 THE COURT: All right. What's your position?

25                 MR. HATFIELD: So a couple of -- several of things.

1 First of all as you'll notice if you look at the request for  
2 production that we've got, they specifically advised us that we  
3 have 30 days to comply with the request for discovery. That is  
4 what they said in their request. You granted an order -- or  
5 you entered an order saying provide responses earlier,  
6 absolutely. Intervenor did not ask you to give a deadline on  
7 that, you gave no deadline on when that should be. We have not  
8 refused to comply with discovery.

9 We have now answered in a supplemental answer, every  
10 single interrogatory, which was half of the motion to  
11 compel. They may not like the answers, but we've now  
12 provided specific answers, including elaborating on some  
13 and in other cases where we had refused to answer,  
14 providing an answer. On the quest for production of  
15 documents, we have not refused to comply. We are in the  
16 process of gathering documents. We have said that we will  
17 make available those petition pages.

18 When we were here on Thursday, just a few business  
19 days ago, I told Your Honor, as the transcript will  
20 reflect, that it would have been impossible to actually  
21 gather up. If I read the discovery requests as broadly as  
22 they seem to read them, it would have been impossible to  
23 comply with those. And so we're not in contempt of any  
24 order because we didn't have an order that specifically  
25 told us when we had to produce the documents. We still



1 believe that we have time to produce the documents. We're  
2 happy to have a conversation about that if we need to.  
3 We've also, Your Honor, within the last hour, filed a  
4 writ in the Court of Appeals, asking the Court of Appeals  
5 to review Your Honor's decisions with respect to certain  
6 of those requests. When the motion to compel was argued  
7 last Thursday, intervenor knew there was a trial date.  
8 They didn't ask Your Honor to order the production by any  
9 particular time; they didn't ask for any particular day;  
10 they have not asked us for any depositions; we've had no  
11 communications about exactly what they wanted us to  
12 produce first and when. We've actually had no requests  
13 for depositions at all in this case.  
14 So we don't think we're in contempt of any particular  
15 order of the Court. I think that the standard on that is  
16 that the Intervenor would have to show you something  
17 specifically that we've refused to comply with. We  
18 understand we've been compelled to comply with discovery,  
19 and we are intending to do that. If the Court of Appeals  
20 denies the writ, and we're intending to do that by the end  
21 of the week whether or not they do that. So that's --  
22 that's where we are.

23 THE COURT: I'll allow for a brief response to that.

24 MR. ELLINGER: Thank you, Judge. I think the brief  
25 response is summed up best in their own words in their

1 supplemental response. This has to do with the petition pages.  
2 Plaintiffs will file, quote, "Signed petition pages," close  
3 quote, with defendant Secretary of State, later this week. At  
4 that time intervenors may obtain the answer to this question  
5 from those business records as the rule allows. So in other  
6 words, we can get them from the Secretary of State, not from  
7 the intervenors. That is refusing to comply. That is not  
8 saying we'll comply later, that is refusing to comply, Judge.  
9 And the fact that they've filed a writ on that in it of itself  
10 probably stay the whole case, depending the outcome of that  
11 writ.

12 THE COURT: I thought we were pretty clear on when  
13 this needed to be figured out, at least verbally. I mean I  
14 guess maybe there wasn't a specific deadline in the order, but  
15 I mean, Mr. Hatfield, you had argued that these weren't -- that  
16 they would be impossible to produce because they would have to  
17 be produced by the trial date. So I feel like -- I mean you  
18 made that argument. I believe I'm --

19 MR. HATFIELD: --

20 THE COURT: -- saying this correctly.

21 MR. HATFIELD: I believe technically what I said is I  
22 cannot do it by the trial date. I pulled the transcript on  
23 that, but I believe what I said is there would be no way to do  
24 it --

25 THE COURT: So -- so you know --

1 MR. HATFIELD: That's still true.

2 THE COURT: So that's my point is that you knew when  
3 these were supposed to be produced; and moreover, you knew what  
4 exactly we were talking about.

5 MR. HATFIELD: Well, with respect, Judge, I did not.

6 I -- I told you that it be impossible to do it by the trial  
7 date. I then got an order compelling me to produce, that did  
8 not specify exactly when. I thought you were acknowledging  
9 that we might not be able to do it by Monday morning by not  
10 entering a particular date. I mean I'm -- I'm used to a person  
11 moving to compel requesting the documents be produced within  
12 five days, ten days or whatever. We are -- we are going to  
13 produce petition pages. We are allowed under the rule to refer  
14 the requester to business records and documents, and let them  
15 inspect those business records and documents, which is exactly  
16 what we intend to do.

17 Like I said, I can't. It's physically impossible to,  
18 when we got your order Thursday night to get those  
19 documents. Even if I -- as we've said in the responses,  
20 even if I understood exactly what I was looking for, it  
21 would be physically impossible to have them to intervenors  
22 today. I think I made that clear on Thursday.

23 THE COURT: That's not my recollection of how -- I  
24 mean I understand that you made that argument, but I put in the  
25 order. And your response doesn't seem like you're wanting to

1 comply with that until there are already public documents; but  
2 then you put in a request, they're already public documents  
3 because they're filed with the Secretary of State. Then why  
4 ask for the additional protective order to have "Attorneys'  
5 eyes only," put on these?

6 MR. HATFIELD: Because of the request for contracts  
7 with third-parties that are gathering signatures; which are  
8 associational -- that's First Amendment associational issues;  
9 and because of the request for validity reports, which we don't  
10 think are at all relevant here, and which we think intervenor  
11 could use for other purposes if they had copies of our validity  
12 reports, so that's why I wanted that. I mean the documents  
13 that are going to be filed publicly -- I mean they're  
14 sunshineable (spelled phonetically) documents. They're --  
15 they're open records. We've always been clear on that --

16 THE COURT: Not yet though. Right?

17 MR. HATFIELD: They will be when they're filed.

18 THE COURT: Well, right.

19 MR. HATFIELD: Well, so I read the motion to compel  
20 again over the weekend, and I understood it to be clarifying  
21 that it was asking for the public documents. The -- the -- the  
22 documents that aren't going to be filed with the Secretary of  
23 State -- I -- I -- I mean I think in its broadest reading,  
24 that's what they were asking for, but I understood them to be  
25 requesting documents that were going to be filed and that were



1 filed so -- and -- and I don't know which ones are going to be  
2 filed. I'm -- I'm going to know which ones my clients intend  
3 to file, probably within the next 24 hours. I don't know which  
4 ones the Secretary is going to allow to be filed. Not an Official

5 So anyways that's the story. I mean I pulled the  
6 transcript. So I said, "So even if I could identify the  
7 records, the burden to get all of that ready, and again we  
8 have a trial on Monday, I mean it's impossible." So it's  
9 disproportionate to the needs of the case. So I mean --

10 THE COURT: But did you even attempt?

11 MR. HATFIELD: I did. I asked the client, "If I  
12 needed to produce these documents, can you get those together  
13 for us?" We've got two problems: Number one is what they want  
14 is signatures that were on pages at a certain period of time.  
15 We don't keep the documents that way. The client doesn't  
16 organize them based on when they were signed. Indeed you have  
17 signature pages that sometimes would have a signature that was  
18 responsive to their request, and then at the bottom of the  
19 page, it's going to have another signature that's outside of  
20 the request. So to go back, yes. I asked the client, "Can we  
21 go back and identify which pages these would be?" They don't  
22 know exactly which pages that those would be. We could try to  
23 do it based on when people have signed and -- and go through  
24 that way; but again, we're allowed to produce the documents and  
25 let them figure that out. So I mean that's what I think I'm

1 probably going to have to do as soon as I can get all of those  
2 documents together.

3 Don't forget they're trying to organize them to turn  
4 them into the Secretary of State, which requires  
5 organizing them by county, stamping them, et cetera. So  
6 they've got a lot going on, but I did ask them if we could  
7 get those documents together and I can't -- they couldn't  
8 get it done by today, as I -- as I predicted on Thursday.

9 THE COURT: Anything else on that, Mr. Ellinger?

10 MR. ELLINGER: Yeah, Judge. I mean if you're  
11 inclined not to strike their pleadings, which I think is the  
12 appropriate response under Rule 61.01, then we should at least  
13 continue the trial until we can get those documents, which may  
14 be in a week or two; although, my opposing counsel and his  
15 responses where we asked for just copies of signed signature  
16 pages said we can get them from the Secretary of State's  
17 office. Now I've been involved in these matters for many  
18 years, so has opposing counsel, and he knows that you can't get  
19 them the day after they're filed at the Secretary of State's  
20 office because they have to go through and process them, they  
21 have to make images of them. So he's basically taking the  
22 burden of an issue that he put at issue in this case,  
23 shuffling -- refusing to respond to his discovery obligations  
24 and shuffling that burden onto the Secretary of State's office.

25 So for those reasons, I think you should strike his

1 pleadings and we should be done here. If you're not  
2 inclined to do so, then I think you should continue this  
3 case until there is a certificate from him that he has  
4 produced all of those documents as requested. Or I guess  
5 if there's writ pending, which we have not been served a  
6 copy of, so I don't have a copy of it --  
7 MR. HATFIELD: You might check Casenet.  
8 MR. ELLINGER: Yeah. Well, we have not received a  
9 notice of it as of the last time I checked, which is an hour  
10 before I came in this courtroom. So if there is a writ, then  
11 we stay it pending the writ too.  
12 THE COURT: Okay. I'm going to take the motion for  
13 sanctions under advisement. We're going to proceed with the  
14 trial today. I don't know if we will conclude. I will show  
15 that the trial is not concluded today just yet. I'm going to  
16 see what happens, see what the arguments are, see what evidence  
17 is brought -- brought up. If for some reason I think that you  
18 are prejudiced by not having received this discovery yet, so  
19 much so that it could affect the -- having a meaningful effect  
20 on the outcome of the case, then we may continue this trial for  
21 further evidence for a later date. I don't know. We're just  
22 going to have to see how it goes today, but the motion for  
23 sanctions is under advisement at this time. Is there anything  
24 else preliminary for the respondents?  
25 MR. ELLINGER: Not from intervenors, Judge.

1 THE COURT: Okay. Petitioner may begin with  
2 evidence.

3 MR. HATFIELD: Thank you, Your Honor. As Your Honor  
4 has heard many types of cases like this where I don't think  
5 there's a lot of evidence to be had. So the first issue that  
6 on December 3rd of 2025, Casenet will reflect that all of the  
7 parties, the Plaintiffs, the State Defendants and the  
8 Intervenors, signed what is titled an amended joint stipulation  
9 of facts and exhibits. Your Honor, just for the record, I  
10 would point out that as is customary, at least in cases I've  
11 been in, that amended joint stipulation reads, "The parties  
12 stipulate to the admission of the following facts and exhibits.  
13 By agreeing to stipulate to these facts and exhibits, the  
14 parties do not concede that such facts and exhibits are  
15 relevant or necessary for the Court to resolve this matter."

16 THE COURT: Yeah. It's just towards their  
17 admissibility, correct.

18 MR. HATFIELD: That -- that's exactly right, Judge.  
19 So I would move the admission of the amended joint stipulation  
20 of facts and exhibits filed on December 5th and signed by  
21 attorneys for all of the parties.

22 THE COURT: Any objection?

23 MR. SEIDLECK: No objection, Judge.

24 MR. ELLINGER: No objection, Judge.

25 MR. HATFIELD: And just to be clear, Judge, that

1 document also includes 15 exhibits that I -- I consider part of  
2 the stipulations. So I just want to be clear that you show all  
3 of those exhibits admitted as well.

4 THE COURT: I'm sorry. What -- what are their  
5 numbers?

6 MR. HATFIELD: Numbers 1 through 15. I can tell you  
7 what they are if that helps, but it is in the stip.

8 THE COURT: Okay. For the record, Exhibits 1 through  
9 15 have been admitted.

10 (Exhibits 1-15 admitted into evidence.)

11 MR. HATFIELD: Your Honor, then on August 28, 2025,  
12 Casenet will reflect that the Secretary of State, the  
13 Defendant, and the Plaintiffs filed a joint stipulation of  
14 facts as well, which contains the same disclaimer that we don't  
15 agree that they're relevant or necessary that we move the  
16 admission of those facts. And I would move the admission of  
17 the joint stipulation entered on August 28<sup>th</sup> of '25.

18 THE COURT: Any objection?

19 MR. ELLINGER: Yes, Judge, we object. Intervenor  
20 were not parties to that first stipulation. We don't agree to  
21 it, and in fact we sought discovery based upon some of the  
22 things that are included in that stipulation. Discovery once  
23 again hasn't been produced as of today. It is not a unanimous  
24 stipulation of facts; therefore, I think you should have -- any  
25 facts that are in there that he wants in the record, he should



1 have to put a witness on and prove them. And therefore, we  
2 would object to the admission of that -- that particular  
3 stipulation because it's not unanimous, it's a side deal  
4 between two parties. As an intervenor we're not -- we are not  
5 involved in that. And I would note, that particular  
6 stipulation references numbers of signatures that they have.  
7 THE COURT: So essentially what you're saying is that  
8 you're not stipulating to it.  
9 MR. ELLINGER: Right.  
10 THE COURT: And so you want to have them lay the  
11 foundation and any other necessary requirements to admit  
12 this -- well, I guess I can't call them stipulations, but those  
13 statements into evidence. Is that --  
14 MR. ELLINGER: Yeah.  
15 THE COURT: -- what you're asking for?  
16 MR. ELLINGER: Yeah. Everything that's in the  
17 proposed stipulation, you've got two of these that we're  
18 talking about, so the one that he has now moved admission for.  
19 Everything that's in that I think needs to be substantiated by  
20 evidence, unless it's been superseded by the amended joint  
21 stipulation of which there was no objection and all parties  
22 agreed to. There are other provisions and terms in the  
23 stipulation he's moving that were not agreed to by the  
24 Intervenor. I think with respect with those to put them into  
25 the record, you would have to have testimony to do so, but many

1 of those are self-servings statements.

2 THE COURT: Okay. Since it's not stipulated to,  
3 what's your plan?

4 MR. HATFIELD: So two things: First of all, they are  
5 statements or admission stipulations of the Secretary of State,  
6 and of the Plaintiff that have been agreed to as being  
7 statements in these cases of both parties. I think that's  
8 admissible evidence just sort of on its face; but second,  
9 Judge, I mean just to be candid, I don't know whether we really  
10 need them. Most of them are in the amended joint stipulation  
11 that Mr. Ellinger has agreed to. Under Rule 73.01 in a Judge  
12 tried case, you are advised to take it into evidence. Even if  
13 you find that it's not admissible, you are advised to take that  
14 evidence into the record for the sake of completeness, and so  
15 that the Court of Appeals can review it.

16 So if Your Honor does not believe that joint  
17 stipulation is admissible as evidence of statements of the  
18 Secretary of State and the Plaintiffs in this case, then  
19 we'd ask under Rule 73.01(a) that you go ahead and make it  
20 part of the record.

21 MR. ELLINGER: And, Judge, under 73.01(a), I think  
22 they still have to establish a foundation for the -- statements  
23 that are in there; and they have to do that with a witness, not  
24 with just signatures of two attorneys that aren't all the  
25 attorneys agreeing to it.

1 MR. HATFIELD: I mean you can read 73.01(a) that  
2 says, if you find it not admissible -- it doesn't say on what  
3 grounds -- if you find it not admissible -- well, let's read  
4 it.

5 THE COURT: Here is what we'll do. I'll let it in,  
6 but I'll decide what, if any, weight to give him.

7 MR. HATFIELD: There you go.

8 THE COURT: Which stipulation? I want to be clear  
9 for the record which one this is.

10 MR. HATFIELD: Filed on October 28th of '25.

11 COURT REPORTER: Judge, are we marking this exhibit?

12 THE COURT: I think it would be cleaner --

13 MR. HATFIELD: I think that's a great idea.

14 THE COURT: -- to mark these stipulations as  
15 exhibits.

16 MR. HATFIELD: So, Your Honor, with everybody's  
17 agreement, can we mark the amended joint stipulation of facts  
18 and exhibits -- that's the December 3rd one that was not  
19 objected to and Your Honor admitted -- can we mark that as  
20 joint Exhibit 1?

21 MR. SEIDLECK: Yes.

22 MR. ELLINGER: Yes.

23 THE COURT: Well, we already have Exhibits 1 through  
24 15.

25 MR. HATFIELD: We -- yes.

1 THE COURT: So should we say 16?

2 MR. HATFIELD: Yes or say A.

3 THE COURT: I just don't want to have multiple of

4 Exhibit 1. Okay. December 3rd amended stipulation is Exhibit

5 16, and the October 21st -- am I saying that correctly?

6 MR. HATFIELD: October 28th, Judge.

7 THE COURT: Forgive me. It is Exhibit 17.

8 (Exhibit 16 and 17 admitted into evidence.)

9 MR. HATFIELD: So just to be clear with Exhibit 17,

10 Judge, you admitted it --

11 THE COURT: Yes.

12 MR. HATFIELD: -- subject to your -- your --

13 THE COURT: Yes. I'll decide what weight to give it.

14 MR. HATFIELD: All right. Okay.

15 THE COURT: And I think that it is already noted for

16 the record, but that it is not stipulated to by intervenors.

17 MR. HATFIELD: Yes, understood. So with those two

18 admitted, Judge, plaintiff rests as it relates to evidence.

19 I'd love to explain it to you a little bit when my time comes.

20 THE COURT: Yes, sir. All right. Thank you. Okay.

21 Evidence for the respondents.

22 MR. SEIDLECK: No evidence from the state, Your

23 Honor, aside from the joint stipulation.

24 (Defendant rests.)

25 MR. ELLINGER: I do have evidence, Judge.

1 THE COURT: Yes, sir. You may proceed.

2 MR. ELLINGER: Thank you. Judge, intervenor would  
3 call Chrissy Peters.

4 THE COURT: You can come up here to the stand.  
5 Before you sit, raise your right hand.

6 (Witness sworn in.)

7 THE COURT: You can take the witness stand. Proceed  
8 when your ready.

9 MR. ELLINGER: Thank you, Judge.

10 (Direct examination.)

11 BY MR. ELLINGER:

12 Q. Would you please state your name for the record.

13 A. Chrissy Peters.

14 Q. And what is your current position?

15 A. I'm director of elections for the Secretary of  
16 State's office.

17 Q. What is the role for director of elections for the  
18 Secretary of State's office?

19 A. So we oversee the elections division under the  
20 Secretary of State's office and implement the statewide voter  
21 registration system; we oversee candidate filing; we oversee  
22 chapter 115 and 116; we do certifications of elections for the  
23 state level; we process initiative petitions and referendums,  
24 and other things.

25 Q. How long have you served in that position?



1 A. I've been in this position since 2017, but with the  
 2 Secretary of State's office elections division since 2018.

3 Q. And what were your prior positions in the elections  
 4 division?

5 A. MCVR elections specialist, elections coordinator, and  
 6 elections operations manager.

7 Q. So as the election director, what are your duties?

8 A. So my duties is just to oversee the responsibility of  
 9 the -- the tasks of the elections division as a whole. I  
 10 have -- we have a staff. And so with the staff of the  
 11 elections division, we do the things that I mentioned prior, in  
 12 addition to like fiscal note responsibilities and other things  
 13 that -- grants -- administering grants and so on.

14 Q. Okay. Tell me about the voter database. You  
 15 mentioned that. What's your role with respect to the voter  
 16 database?

17 A. So the Secretary of State's office, they maintain and  
 18 secure the statewide voter registration database, but the -- we  
 19 have a 116 local election authorities that will input voter  
 20 information, elections information, and district information  
 21 from that local level, and they maintain voter roles; and then  
 22 the statewide system also provides candidate filing and  
 23 election by reporting for any of the state elections that we  
 24 conduct. The local election authorities also use that  
 25 statewide voter registration database for local elections.

1 While we might not have issues or questions -- or issues or  
2 candidates on local elections, we will provide guidance and  
3 oversight to assist the local election authorities.

4 Q. And then you talked about overseeing elections -- the  
5 statewide elections --

6 A. Yes.

7 Q. -- I presume you're referring to. Is that correct?

8 A. Yes.

9 Q. Okay. And -- and what is the role in overseeing  
10 elections?

11 A. So the role in overseeing elections is we will  
12 process ballot measures -- statewide ballot measures; we will  
13 conduct candidate filing; and we will certify to the local  
14 election authorities as a political subdivision, any candidates  
15 and/or questions that have to be on the ballot to conduct those  
16 local elections, and in addition to the statewide ballot  
17 measures and/or candidates.

18 Q. You mentioned that you have -- you oversee the  
19 elections related to statewide initiatives for referendums.

20 Right?

21 A. Yes.

22 Q. What are your duties with respect to initiative and  
23 referendum petitions?

24 A. So initiative petitions, that process starts in the  
25 beginning when an individual may produce a sample page to our

1 office for certification. And so when we receive a sample page  
2 for a statewide initiative petition, we will go through the  
3 process of working with the Attorney General's office for  
4 approval to form; we will work with the auditor's office for  
5 fiscal impact, and during that process, that takes some time;  
6 and then at the end, we will certify that initiative petition  
7 for circulation.

8 Q. Okay. Let's kind of break those down in steps.

9 A. Okay.

10 Q. So when a person brings a proposed signature where --  
11 can we use referendum petitions for this purpose?

12 A. --

13 Q. -- brings a proposed referendum petition to your  
14 office, what steps do you follow initially with that?

15 A. So we will accept it, and then we have a couple days  
16 before we send it over to the AG's office for approval to form.

17 Q. Okay.

18 A. And then after that step is complete, then we also --  
19 we send that out to the auditor for a fiscal note impact. And

20 then in the meantime, as those things -- as correspondence and

21 things get approved, we are communicating with the individual

22 who submitted to our office, information and correspondence

23 until we get through to the point where we have ballot

24 language, we have approved ballot language, and the Secretary

25 of State approves it for circulation at that time.

1 Q. So I think you said you accept it when they first  
2 bring it to you.

3 A. Correct. It would be filed.

4 Q. Okay. And then you go through this process with the  
5 Attorney General's office to get approval as to form.

6 A. That's the first, yes.

7 Q. Okay. Does sometimes the Attorney General reject  
8 petitions as to form?

9 A. Yes.

10 Q. And what's the role of your office in the event that  
11 the Attorney General rejects the petition as to form?

12 A. We will notify the -- the filer of the information  
13 that was provided to our office from the Attorney General's  
14 office, and then we will issue a correspondence letter saying  
15 that it was rejected as to form.

16 Q. Just so I'm clear, when you say correspondence  
17 letter, what do you mean?

18 A. It's just like a cover letter that will summarize  
19 what the Attorney General's office has stated, but additionally  
20 we attach the Attorney General's letter.

21 Q. Okay. And does the -- to the best of your knowledge,  
22 do you defer to the decisions of the Attorney General in that  
23 case?

24 A. Yes.

25 Q. Okay. So after you do the processing to prove as to  
28

1 form -- and I think you said you're involved in the ballot

2 title and the fiscal note summary too. Right?

3 A. Correct.

4 Q. Okay. I don't think that's at issue in this case, so

5 we won't waste any --

6 A. Okay.

7 Q. -- time. At some point presumably, sometimes these  
8 petitions are submitted with signatures. Is that right?

9 A. So once we approve the initiative petition for  
10 circulation, then they can gather signatures. And yes, there

11 will be a time when people will submit petitions with  
12 signatures to our office.

13 Q. Okay. What's the process that you follow when

14 someone submits those signed initiative -- or referendum  
15 petitions?

16 A. So the processes is we will coordinate with them on  
17 logistics, but we will work with petitioner, and they will have  
18 to submit all of their signature pages with full ballot

19 language, to our office. It has to be organized by county and

20 folders, and it's typically a large volume because this is a

21 usually statewide initiative, so we will work with them. Once

22 we have received all of the boxes into our office, we will then

23 work with them to issue a box receipt at that point to make a

24 determination of how many boxes they have submitted, when the

25 official box receipt has been issued, and then that is when it



1 becomes in our possession, and we will then start processing  
2 the steps for next steps. Do you want me to talk about that  
3 or --  
4 Q. No. Since you said processing, why don't you explain  
5 what the next steps are?  
6 A. Processing next steps so that typically there is a --  
7 there is an opportunity where an initiative petition signature  
8 page will be attached to full ballot language. We have to prep  
9 that for processing with our scanning team. And so there are  
10 several things that we look for. We look for that the  
11 circulator affidavit is complete and we make sure that the  
12 ballot language is attached. If either one of those are not  
13 something that is in place, we set those to the side because  
14 they would be not valid; and then the rest we just separate the  
15 signature page in itself, maintain the folders that they are  
16 submitted to, and prep it for our scanning team. Our scanning  
17 team now then will scan those documents into our statewide  
18 petition database. And once they scan those, they scan it in  
19 by county and they receive a Bates number that is issued by  
20 our -- by our technology. And then once that is in place, then  
21 we -- if we have one petition filed -- one to two petition  
22 files, we have two weeks to get that out to the local election  
23 authorities -- the local election authorities to help verify if  
24 the individuals who signed the petition are registered voters,  
25 not registered voters, so on and so forth.

1 Q. Okay. You send these scans. Is that a fair  
2 statement?

3 A. Yes, they get scanned in.

4 Q. You send these scans to local election authorities.

5 What's the process of the Secretary of State's office that the  
6 elections division does after those scans go out to the local  
7 election authorities?

8 A. So the scans, because of technologies and  
9 efficiencies we've built into the Secretary of State's  
10 office -- so scans are the -- they -- they live in the  
11 database. They live in the statewide petition database. So we  
12 turn on that statewide petition pages for local election  
13 authorities and line by line review if an individual is  
14 registered to vote or not registered to vote, and then we -- we  
15 can track their progress and we can review each individual  
16 county's process.

17 Now another thing that the technology allows for us  
18 to do, is determine how many signatures are submitted by a  
19 county. And so we have found ourselves in the past to be  
20 mindful of people's resources and time, if there is not a  
21 sufficient number of signatures collected in a particular  
22 congressional district to begin with, that they don't even meet  
23 the threshold by law, then we would not send out the signature  
24 for verification to those particular counties in a particular  
25 congressional district to -- to be mindful of resources and

1 time.

2 Q. Okay. And then you mentioned that you -- you turn on  
3 the system, I think was the term you used.

4 A. That's correct. We'll turn it on so that the local  
5 election authorities can view. And when they log in with their  
6 credentials, they will see the pages assigned to their county  
7 as the county user.

8 Q. Is that the first point at which the database -- I  
9 don't know if that's the right term -- of all the scans, is  
10 complete and available when you turn it on for the local  
11 election authorities?

12 A. Yes. I would say that that's when it's -- it's ready  
13 to go.

14 Q. Okay.

15 A. Yes.

16 Q. Okay. And so can any average person access that  
17 database?

18 A. No.

19 Q. So then the election -- the local election  
20 authorities -- you might explain what the local election  
21 authorities are.

22 A. So a local election authority, we have 116 in our  
23 state, most of them are elected as the County Clerk. But in  
24 our larger jurisdictions, they would be a board of elections  
25 that appoints both a Democratic and a Republican director, and

1 they are the election authority for those particular larger  
 2 jurisdictions. But the -- for the majority it is County  
 3 Clerk's County. Not an Official Court Document

4 Q. And in years past, you -- actual physical photocopies  
 5 would have gone to those local election authorities. Right?

6 A. Those -- yes, that did happen in the past.

7 Q. Under the current system, do the local election  
 8 authorities have physical copies of signature pages?

9 A. They do not.

10 Q. Okay. So at -- what happens -- well, what do the  
 11 local election authorities report back to you?

12 A. So the local election authorities, when they log into  
 13 the system and they select the petition that they're working  
 14 on, it serves as a line by line review of everything that is  
 15 scanned in for that county. So in the event that a page has  
 16 four signatures within blank lines and/or crossed out lines --  
 17 like we're going to process each line on that page; but  
 18 essentially, they're going to look at the data that's provided  
 19 on the signature line for name, address, and a combination of,  
 20 to do a search in our statewide system; and then the state --  
 21 the statewide system -- the Missouri statewide system will pull  
 22 up the most three recent signatures that are on file so that  
 23 they can do a signature verification to determine if that  
 24 person is registered to vote and if their signature matches;  
 25 and then they mark it to move on to the next line. And that is

1 just a continuous process until there is no more lines left to  
2 process. And it is designed so that multiple users can be in  
3 the system in a county. And with the new technology, even  
4 state users can assist -- state -- the Secretary of State's  
5 office can assist.

6 Q. Okay. And then do you get something back from the  
7 local election authority?

8 A. We do get notification back from the local election  
9 authority when they have completed their work. And so then  
10 what the system does is generates a summary report that will  
11 tell us how many signatures were registered, not registered; if  
12 you -- if you have a county that's in a split congressional  
13 district; how many of those are assigned to one particular  
14 congressional district; and then if there were invalid  
15 signatures, duplicates, if there was -- I'm trying to think of  
16 what the -- how it lines -- how it lines out. But anyways,  
17 it's a report that is generated once they are complete with  
18 their process on their side.

19 Q. And does that report kind of generally follow your  
20 regulations in the talk about processing signatures?

21 A. Yes.

22 Q. Okay. So after all the LEA's have completed their  
23 process, what's the next step for your office?

24 A. So because we are serving 116 local election  
25 authorities, we will track the progress by congressional



1 district. And as we compile that data and that information, we  
2 also do -- if -- if time allows, we also do a quality control  
3 process to ensure that the work on the County Clerk's side is  
4 consistent with what we are seeing statewide. The quality  
5 control has been a -- a -- a blessing for making sure that we  
6 are certifying information and data accurately to reflect  
7 what's being collected and sent to our office.

8 Q. Okay. And then do you issue something formally?

9 A. So once all of that is complete, there would be a  
10 certificate of sufficiency or a certificate of insufficiency.

11 MR. ELLINGER: Okay. Judge, can I approach the  
12 witness, please?

13 THE COURT: Continuing permission granted.

14 BY MR. ELLINGER:

15 Q. I'm handing you what's been marked as intervenor's --  
16 excuse me, Exhibit INT-A. Do see that?

17 A. Yes.

18 Q. Do you recognize this document?

19 A. So this is a certificate of sufficiency of a petition  
20 that was issued on August 13<sup>th</sup> of 2024, for an initiative  
21 petition.

22 Q. And what's the process internally that you guys go  
23 through to come up with these two pieces of paper after you get  
24 the local election returns?

25 A. So the second page is because we have to track things

1 by congressional. You know, we do have a spreadsheet that we  
 2 track progress as things come in from local election  
 3 authorities. And we will show the number of signatures needed,  
 4 which is determined after an election, and -- determined on 5  
 5 percent, and then the signatures verified in that district and  
 6 the number of valid signatures from the number of signatures  
 7 that are verified. So this is all going to be -- reflect our  
 8 internal tracking by congressional district of signatures  
 9 verified as they come back from the local election authorities.

10 Q. Okay. What about the first page?

11 A. The first page is a certificate of sufficiency of  
 12 petition that will simply talk about the official ballot title,  
 13 which of course in the previous process before we approve it  
 14 for circulation, the official ballot title will already have  
 15 been determined. So then we are just addressing the petition  
 16 is going to -- the sufficient number of valid signatures; and  
 17 therefore, it will be placed on the ballot for that particular  
 18 election.

19 MR. ELLINGER: Okay. Judge, I move for the admission  
 20 of intervenor's Exhibit A.

21 THE COURT: Any objection?

22 MR. HATFIELD: None from plaintiff.

23 THE COURT: A will be admitted.

24 (Exhibit A admitted into evidence.)

25 BY MR. ELLINGER:

1 Q. Then you mention something called the certificate of  
2 insufficiency.

3 A. Correct.

4 Q. What's the certificate of insufficiency?

5 A. So in our analysis, if we determine that there was  
6 not enough signatures collected in congressional districts,  
7 then our office's position would be to certify an insufficiency  
8 of the petition, and that would not go on the ballot.

9 Q. I'm showing you what's been marked as intervenor's  
10 Exhibit B.

11 MR. HATFIELD: No objection to the admission of  
12 Exhibit B.

13 THE COURT: Are you moving to --

14 MR. ELLINGER: --

15 THE COURT: -- admission?

16 MR. ELLINGER: I'll move Exhibit B then.

17 THE COURT: All right, B will be admitted.  
18 (Exhibit B admitted into evidence.)

19 BY MR. ELLINGER:

20 Q. Do you recognize this document?

21 A. Yes.

22 Q. Okay. And what role do you play with respect to  
23 preparing this document?

24 A. So if this is -- so if we're going to issue a  
25 certificate of insufficiency, the same process works as far as

1 creating the certificate of insufficiency for the Secretary to  
 2 sign and pretty much has the same official ballot title on it,  
 3 but then it goes on to say since it was insufficient, it will  
 4 not be placed on the ballot. We also give them a breakdown  
 5 again, of the results of the verification of the signatures and  
 6 the process, and then just a cover letter that myself as the  
 7 director of elections would sign to go with that --

8 Q. Okay.

9 A. Correspondence.

10 Q. And I'm turning to the last page of intervenor's  
 11 Exhibit B. Is this that tracking by various counties?

12 A. Correct. This is the compilation of our tracking of  
 13 the results by each congressional district internally, as the  
 14 process goes through.

15 Q. And I noticed on the second page, the one that has  
 16 the pretty seal on it, really the biggest difference is that it  
 17 says, "I certify that this petition does not contain enough."  
 18 So basically it's the number of valid signatures.

19 A. Correct.

20 Q. Is that basically the difference between them?

21 A. Well, that is the difference. Right? One is going  
 22 to go -- a sufficient is going to go on the -- on the ballot  
 23 for voting, and the insufficient will not make the threshold  
 24 for it to go on the ballot.

25 Q. So looking at intervenor's Exhibit A, which is a

1 certificate of sufficiency --

2 A. Yes.

3 Q. Can that certificate be issued until the verification  
4 process for signatures is done?

5 A. Right. We -- we do the certificate of sufficiency  
6 and insufficiency after we complete the review of the  
7 verification signatures.

8 Q. And who makes the final decision to certify if a  
9 petition is sufficient?

10 A. We utilize the information provided by our local  
11 election authorities, perform quality control, and then the  
12 Secretary will make that determination based on the information  
13 the elections division will provide.

14 Q. Do you know of anyone else in the office that could  
15 issue the certificate if the secretary didn't want to?

16 A. I am not aware.

17 Q. And with respect to intervenor's Exhibit B, the  
18 certificate of insufficiency, who makes the final decision to  
19 sign for that document?

20 A. That would be the Secretary as well.

21 Q. So you're aware that there are some referendum  
22 petitions in question is the reason you're here today.

23 A. Yes.

24 Q. Okay. And were you involved in the initial  
25 processing for lack of a better term of those proposed



1 referendum petitions?

2 A. Yes. In my normal course of business, that would be  
3 part of our role in the elections division, yes.

4 Q. And do you recall -- do you recall when the first  
5 petition is filed?

6 A. Yes.

7 Q. When was that?

8 A. Oh you want a date. Not off of the top of my head.

9 MR. ELLINGER: Judge, inside the stipulation -- the  
10 amended joint stipulation, there are a number of documents. I  
11 guess they're exhibits technically. I don't know what the most  
12 convenient way of handling this is because this has all been  
13 filed inside the system.

14 MR. HATFIELD: You don't have to, Marc, but --

15 MR. ELLINGER: That's okay. I can provide the whole  
16 book to her, or I can pull parts out. How would you like it?  
17 You have it on your computer so.

18 THE COURT: It's up to you.

19 BY MR. ELLINGER:

20 Q. I'm going to hand you --

21 MR. ELLINGER: What number was this? Did we decide  
22 this was 16?

23 THE COURT: The amended stipulation is 16.

24 BY MR. ELLINGER:

25 Q. I'm going to hand you -- well, it hasn't been marked,

1 but it's been admitted as Exhibit 16.

2 A. Okay.

3 Q. Okay.

4 A. Okay.

5 Q. And we'll flip through this real quickly.

6 A. Okay.

7 Q. Can you take a look at the tab for Exhibit 4?

8 A. Okay.

9 Q. Do you recognize what the exhibit that Exhibit 4 is?

10 A. This is the petition cover sheet, statement of  
11 committee organization, and the proposed referendum signature  
12 page, and the full one.

13 Q. Okay. And is this the petition that was denominated,  
14 2026-R001?

15 A. Yes.

16 Q. And can you tell by looking at Exhibit 4, what day it  
17 was filed?

18 A. It was filed on September 12<sup>th</sup>.

19 Q. Okay. Then I would ask you to flip to the tab that  
20 is Exhibit 5.

21 A. Okay.

22 Q. Okay. What is Exhibit 5?

23 A. It will be the second one filed on September 12<sup>th</sup> as  
24 well.

25 Q. Okay. And is this the one known as 2026-R002?

1 A. That is correct.

2 Q. Then could you flip to Exhibit 8?

3 A. Okay.

4 Q. And what is Exhibit 8?

5 A. It is the initiative petition, submission and cover

6 page, the committee of organization, the signature -- sample

7 signature page and the full ballot language submitted on

8 September 15, 2025.

9 Q. Okay. And is that the one designated as 2026-R003?

10 A. That's correct.

11 Q. Okay. And then I'd ask you to flip to Exhibit 12.

12 A. Okay.

13 Q. Do you recognize Exhibit 12?

14 A. Yes. So this would be submitted on September 29<sup>th</sup>.

15 It is the petition cover page, the committee of organization,

16 the signature -- the sample signature page, and the full ballot

17 language.

18 Q. Okay. And is this the referendum petition known and

19 marked -- designated as 2026-R002 -- referendum petition

20 identified as 2026-R004?

21 A. That's correct.

22 Q. Okay. And each of these are separate referendum

23 petitions. Correct?

24 A. They were filed separately.

25 Q. Okay. All right. Could you turn to Exhibit 11,

1 please?

2 A. Okay.

3 Q. Do you recognize Exhibit 11?

4 A. Yes.

5 Q. Okay. Who prepared this document?

6 A. This document was prepared in our normal course of  
7 business with legal executive and elections division.

8 Q. And what is this letter?

9 A. This is a rejection of the first proposed referendum  
10 petition.

11 Q. Okay. And there's a -- if you flip the next page --

12 A. Yes.

13 Q. What is this?

14 A. That's the opinion letter issued by the Attorney  
15 General's office in respect to our -- well, the first petition  
16 filed -- or the first referendum filed with the Secretary of  
17 State's office.

18 Q. Okay. And if you'll flip back two more pages,  
19 there's another letter. In that same exhibit, just continue  
20 going.

21 A. Oh. In the same exhibit --

22 Q. In the same exhibit, yup.

23 A. I'm going to -- okay.

24 Q. Okay. Do you see another letter there?

25 A. Yes.

1 Q. And what is that?

2 A. So that's also the rejection of the second proposed  
3 referendum petition from our office.

4 Q. Okay. And then there's an Attorney General's opinion  
5 attached to that too.

6 A. That's correct.

7 Q. Okay. And you all rely on the Attorney General's  
8 opinion?

9 A. That's --

10 Q. -- and rejection.

11 A. That's correct.

12 Q. Okay. And then if you'll flip a couple more pages,  
13 there's another letter.

14 A. Okay. Rejection of third proposed referendum  
15 petition, sent by our office.

16 Q. Okay. And is that -- that also has an Attorney  
17 General's opinion attached to it.

18 A. That is correct.

19 Q. Okay. And I think you said this is done in the  
20 normal course of business.

21 A. Yes.

22 Q. Okay. And how often have you had to send rejection  
23 letters for various initiative petitions?

24 A. There are several times in an initiative petition  
25 process that there are going to be rejection letters sent,



1 based on the information provided by the Attorney General's  
 2 office. We -- the Secretary of State's office can sometimes  
 3 also reject it to form in the process that I'm aware.

4 Q. And if you look at these letters -- and you're  
 5 familiar with them.

6 A. Yes.

7 Q. Do they reject any signatures?

8 A. No. They -- no.

9 Q. Okay. Let me ask you to flip to Exhibit 13.

10 A. Okay.

11 MR. ELLINGER: Judge, if you need physical copies, I  
 12 can provide those to you.

13 THE COURT: I've got it pulled up.

14 MR. ELLINGER: Okay.

15 THE COURT: Thank you.

16 BY MR. ELLINGER:

17 Q. Do you recognize this letter?

18 A. Yes.

19 Q. Okay. And what -- what is this letter?

20 A. So this letter was issued on October 14<sup>th</sup>, and is the  
 21 approval to form, the referendum petition 2026-R004.

22 Q. Okay. And what does it mean when you approve a  
 23 petition for circulation?

24 A. So this was an approval to form only.

25 Q. Okay.

1 A. This letter was an approval to form, based on the  
2 information provided by the AG's opinion, and then issued to  
3 the petitioner.

4 Q. Okay. And why is it important to send them a letter  
5 that it's been approved?

6 A. It is part of the process. It's part of our  
7 deadlines, and it's just to let them know that -- you know, we  
8 have approved them to form. There are other steps that still  
9 take place, but that's the first step for us to continue with  
10 the ballot title language and the auditor's response.

11 Q. Okay. And is this a document that you would normally  
12 send an approval as to form letter to --

13 A. An approval as to form letter is a normal document  
14 that we would send in the initiative petition process, yes.

15 Q. Okay. So I'd like you to take a look at the  
16 next-to-last paragraph. That's the paragraph that begins,  
17 "Consistent with No Bans on Choice." Do you see that  
18 paragraph?

19 A. Yes.

20 Q. And I'd like you to kind of go down a few lines to  
21 the line that says, "However," do you see that?

22 A. (No response.)

23 Q. However, after circulation --

24 A. Yes.

25 Q. So tell me what that line says.

1 A. "So however, after circulation and a consummation of  
2 signatures, the Secretary of State's -- the Secretary of State  
3 must examine the petition to determine whether it complies,"  
4 quote, "with the Constitution, and with this chapter," end  
5 quote, referencing 116.120.1 RSMo. Do you want me to continue?

6 Q. Yes, please.

7 A. If statutory or constitutional deficiencies become  
8 apparent during verification or before certification; such as  
9 failure to meet signature thresholds, improper timing under  
10 Article 3, Section 52(a), or defects affecting the validity of  
11 the referendum, the Secretary may decline to certify the  
12 petition for placement on the ballot. Any such determination  
13 remains subject to a judicial review.

14 Q. Okay. So has the Secretary of State rejected this  
15 referendum petition from appearing on the ballot in November?

16 A. No.

17 Q. Does this letter make any determination as to whether  
18 a referendum petition will or won't be on the ballot in  
19 November?

20 A. No.

21 Q. What actions have to be done by your office, and I  
22 guess by the proponents, before we get to a determination as to  
23 whether a referendum would appear on the ballot?

24 A. So once the petition -- or the referendum is filed  
25 with signatures for verification, I spoke to earlier all of the

1 processes that take place through our office under the local  
2 election authorities verification, and then we track  
3 sufficiency and insufficiency based on information provided by  
4 local election authorities. We have to perform quality  
5 control, and then we would issue a certificate of insufficiency  
6 or sufficiency at that time.

7 Q. And sometimes initiative petitions that are approved  
8 as to form, they're never -- they're never signature submitted.  
9 Right?

10 A. Well, yes. Yes. That -- yes. A lot of times we  
11 will approve for circulation or to form, and the petitions are  
12 not circulated, and they are not --

13 Q. So -- so the failure to file within the timeliness  
14 windows that are laid out in the Constitution would be an  
15 example of a reason it would not appear on the ballot.

16 A. If they do not turn them in, that is correct.

17 Q. Okay. Similarly if they failed to meet the signature  
18 threshold, would it appear on the ballot?

19 A. If it was determined that the number of signatures  
20 were insufficient, then we would issue that certificate of  
21 insufficiency and it would not be on the ballot.

22 Q. Okay. And I guess there could be other defects  
23 related to the petition that might occur. A determination will  
24 be made after the verification of signatures.

25 A. Right. So we do review for making sure that the full

1 ballot language is attached, making sure that we are -- the  
2 affidavit and the circulator is -- is complete. Those types of  
3 things are also reviewed. If signatures are collected on those  
4 types of pages, then they would not be valid signatures.

5 Q. And is that --

6 A. It's all part of that process, yes.

7 Q. And then I'll call your attention to the last line  
8 that -- that's a paragraph, "Any such determination remains  
9 subject to judicial review." Did I read that right?

10 A. Yes.

11 Q. So if there is a rejection for some reason after and  
12 a certificate of insufficiency issue, what does the proponent  
13 have the opportunity to do?

14 A. So after we determine sufficiency or insufficiency,  
15 anybody has the opportunity -- I mean it might not be anybody,  
16 but there can be a challenge to that filed with the petition to  
17 the courts within ten days after our sufficiency or  
18 insufficiency certification.

19 Q. Okay. Has the Secretary issued a certificate of  
20 sufficiency or insufficiency with respect to any of the four  
21 referendum petitions?

22 A. No.

23 Q. Okay. Does this letter reject any signatures?

24 A. No.

25 Q. Speaking of, what happens after a certificate of



1 insufficiency? Have there been judicial actions brought in the  
2 past?

3 A. Yes.  
4 Q. And have some of those measures appeared on the

5 ballot?  
6 A. Yes.

7 Q. So there is -- you can go to court and get relief.  
8 A. Yes.

9 Q. Speaking to the current referendum petitions, have  
10 any signed referendum petitions been submitted to the Secretary  
11 of State's office as of today?

12 A. Not as of today.

13 Q. Okay. And you would know if they were submitted.

14 A. Unless it's happening now, yes. I would know.

15 Q. You would probably get a message if it was happening  
16 now. Wouldn't you?

17 A. Oh yes.

18 Q. Has the Secretary of State's office processed any  
19 signature pages for any referendum petitions this cycle?

20 A. No.

21 Q. Has any final decision about the sufficiency or  
22 insufficiency been made by the Secretary of State's office on  
23 any of the referendum petitions in this cycle?

24 A. No.

25 Q. If signature pages are submitted in the future, will

1 your office follow that process that you addressed earlier?

2 A. Yes.

3 Q. And after that process is completed, who decides to  
4 issue the certificate of sufficiency or insufficiency?

5 A. The Secretary of State.

6 Q. And since you've been at the Secretary's office, has  
7 a certificate of sufficiency or insufficiency ever been issued  
8 before the signature verification process was completed?

9 A. No.

10 Q. Do you have any knowledge of when the proponents  
11 began collecting signatures?

12 A. Just might what I -- what I might have read in media  
13 articles.

14 Q. No one from the proponents came to you and said, "I'm  
15 out circulating signatures today."

16 A. No. I am aware that signatures are being collected,  
17 yes. Yes.

18 Q. But not what day they started.

19 A. I don't. I'm not aware of what day they started.

20 Q. Okay. Between September 15 and September 28, within  
21 that window --

22 A. Okay.

23 Q. -- were there any signatures on referendum petitions  
24 submitted to your office?

25 A. No.

1 Q. Okay. Do you know if there were any signatures on  
 2 initiative -- or excuse me -- referendum petitions had been  
 3 collected at that point in time?

4 A. I mean based on articles that I had read in my -- my  
 5 course of business, I would have known that they were  
 6 collecting signatures.

7 Q. Do you know how many they collected in that time  
 8 period?

9 A. I'm not aware of -- I -- I can't recall any numbers I  
 10 may or may not have seen.

11 Q. Okay. And between September 29<sup>th</sup> and October 14<sup>th</sup>,  
 12 have there been -- were there any signatures submitted for the  
 13 referendum petitions?

14 A. Not first-hand knowledge, just -- just what would  
 15 have been read in --

16 Q. Let me rephrase that.

17 A. Okay.

18 Q. Okay. So that -- for that window --

19 A. Yes.

20 Q. -- of September 29, 2025, through October 14<sup>th</sup> of  
 21 this year, were there any signed signature pages submitted to  
 22 the Secretary of State's office for the referendum petitions?

23 A. No.

24 Q. Okay. And do you know how many signatures the  
 25 proponents may have gathered in that window of time?

1 A. I would not have first-hand knowledge of that, no.

2 Q. Is there anyone in your office who would have that  
3 knowledge -- have the actual knowledge of that?

4 A. No.

5 MR. HATFIELD: Judge, calls for speculation.

6 THE COURT: She can answer to the best of her  
7 personal knowledge.

8 You can answer.

9 BY MR. ELLINGER:

10 A. Not that I'm aware of.

11 MR. ELLINGER: No further questions, Judge.

12 THE COURT: Does the other respondent have any  
13 questions for this witness?

14 MR. SEIDLECK: No questions, Your Honor.

15 THE COURT: Okay, cross.

16 (CROSS-EXAMINATION.)

17 BY MR. HATFIELD:

18 Q. Since the Judge went to Mr. Seidleck, is Mr. Ellinger  
19 your attorney?

20 A. No.

21 Q. Okay. You were -- you were very smooth there in your  
22 presentation, as you usually are. You -- you talked to  
23 Mr. Ellinger about what you were going to say today. Right?

24 A. There -- at normal course of prep, yes.

25 Q. Yeah. In other words, the intervenor and you talked,

1 and you -- he told you what you were -- he was going to ask

2 you, and you told him what you were going to say.

3 A. Yes. I would have discussed -- you know, what my

4 knowledge is of questions that he would be asking.

5 Q. And to your knowledge, did anybody at the Secretary

6 of State notify the Plaintiffs that you were having these

7 conversations with intervenor's counsel?

8 A. To my knowledge, I do not know.

9 Q. Okay. Nobody from any -- was anybody from the AG's  
10 office there when you had this conversation with Mr. Ellinger?

11 A. No.

12 Q. Just you and Mr. Ellinger talking about what you were  
13 going to say today. Right?

14 A. With discussion with -- with the Secretary of State's  
15 counsel.

16 Q. Okay. All right. Fair enough. I'm going to be a  
17 little less organized --

18 A. Okay.

19 Q. -- because I haven't had the pleasure. Ms. Peters,  
20 you are aware of a case called Missouri General Assembly versus  
21 Von Glahn and People Not Politicians in federal court?

22 A. Am I aware of that that? Yes, in general.

23 Q. Well, you filed an affidavit in that case. Correct?

24 A. That is correct.

25 Q. You filed an affidavit in support of the Attorney



1 General's request for preliminary injunction in that case.

2 Right?

3 A. An affidavit speaking to information that I could  
4 attest to, yes.

5 Q. Right. And what you want there, is you want the  
6 federal court to order that my client cannot turn in any of  
7 these initiatives. Right? Or these referendums I should say.

8 A. (No response.)

9 Q. If -- if -- you can answer yes or no. I'm not -- I  
10 mean whatever your answer is, it will be. But what you're  
11 asking the federal court, is for an injunction to prohibit my  
12 client from submitting referendum petitions. Is that right or  
13 wrong?

14 MR. ELLINGER: I'm going to object, Judge. I think  
15 it calls for a legal conclusion, and she's neither a lawyer or  
16 a party to that case. She just filed some testimony.

17 THE COURT: Are you asking whether she has a position  
18 on the lawsuit or a personal position?

19 MR. HATFIELD: I'm asking if she has knowledge as the  
20 deputy -- are you the deputy secretary still or did they change  
21 your title?

22 THE WITNESS: No --

23 MR. HATFIELD: As the director of elections, does she  
24 have knowledge of what the Secretary of State asked the federal  
25 court for in a case where she filed an affidavit.

1 THE COURT: Okay. Yes, ask that question. The  
2 objection is overruled.

3 THE WITNESS: Okay.

4 BY MR. HATFIELD:

5 Q. That's my question.

6 A. I am aware of the affidavit in which I signed. The  
7 other portion of that particular process is not something that  
8 I have been involved in, other than signing the affidavit --

9 Q. Okay.

10 A. -- and attesting to that.

11 Q. Well, okay. Then what was the point of the  
12 affidavit? I'll just let you -- rather than me dribbling this  
13 out -- what -- what was the point you were trying to make to  
14 the federal court when you filed this affidavit, under oath, in  
15 federal court?

16 MR. ELLINGER: To provide information from the  
17 position of our legal counsel, and the position of the  
18 responsibilities or documents that have been filed in the  
19 process of this referendum.

20 Q. Okay. I don't mean to draw this out, but I need to  
21 make sure I understand what you're saying. Was the affidavit  
22 your knowledge and words, or was it your legal counsel's?

23 A. No. It was -- it was reviewed -- it was reviewed --

24 Q. Sure.

25 A. -- and signed by me, yes.

1 Q. Right.

2 A. With information -- I -- the affidavit -- it's  
3 been -- it's been a while, so -- since I signed the affidavit,  
4 so I would have to view specific things on that affidavit in  
5 order for me to speak details to them.

6 Q. Your affidavit essentially -- tell me if I'm wrong --  
7 told the federal court that there would be harm or whatever  
8 word you want to use, problems for the Secretary of State if my  
9 client actually turned in the referendum. Fair?

10 A. I think it would be, at this point, fair for me to  
11 review the affidavit before I can specifically speak to the  
12 details of it.

13 Q. Okay.

14 A. I just -- I recall it talking about documents that  
15 have been filed with our office.

16 Q. Well, we're going to do that. One of the things that  
17 you said in that affidavit -- if you can remember, and if you  
18 can't, that's okay, tell the Judge.

19 A. Okay.

20 Q. Is that there -- you would have to devote a lot of  
21 resources and people to review any signatures.

22 A. Okay. That is correct.

23 Q. That is correct.

24 A. Yes.

25 Q. And in that affidavit, you assumed that there are

1 going to be signatures turned in.

2 A. That is correct, yes.

3 Q. And -- and you assumed that you were going to have  
4 extra administrative burdens because the Plaintiffs are in fact  
5 going to turn in signatures.

6 A. There will be resources you -- at our -- at our  
7 office and for local election authorities, that is correct.

8 Q. And based on your experiences, it was a reasonable  
9 assumption based on all you know about this referendum, that  
10 there are going to be signatures turned in.

11 A. That is my understanding, yes.

12 Q. And in -- and in fact, you have reason to believe  
13 that signatures will be turned in tomorrow.

14 A. Tomorrow, Wednesday or Thursday, yes.

15 Q. And you have made arrangements for my clients to  
16 actually turn in the signatures.

17 A. That's correct. We're still working through details,  
18 but there is -- yes. There has been conversations about  
19 logistics. That is correct.

20 Q. You've told them where to go, you've told them where  
21 you're going to put the signatures, you've sent them a form to  
22 fill out when they turn in the signatures.

23 A. Right, that's correct.

24 Q. And that's because you fully expect signatures to be  
25 turned in.

1 A. That is correct.

2 Q. All right. Now I'm going to work backwards. Mr.

3 Ellinger talked to you through a little bit. He had some

4 questions about timeframes; were any signatures submitted

5 during this period, were any signatures submitted during that

6 period.

7 A. Correct.

8 Q. And you said no.

9 A. Correct.

10 Q. The position of the Secretary of State is that my

11 clients have to wait and turn in all the signatures at once.

12 Correct?

13 A. For a referendum or initiative petition, that is

14 correct. The Secretary of State's office requires that all

15 signatures be submitted at one time.

16 Q. Yeah. I said my client just to bring it --

17 A. Sure.

18 Q. -- home, but this isn't a special rule. The

19 Secretary of State's position is, you can't do it in dribs and

20 drabs. I can't turn in my November signatures, and then later

21 turn in my December signatures.

22 A. That is correct.

23 Q. That is correct. So we got to wait till the end and

24 turn them all in at the same time. Right?

25 A. Yes.

1 Q. All right. Now I think we got this covered, but Mr.

2 Ellinger talked about whether you were aware that people are  
3 out there collecting, and you said -- tell me again.

4 A. I --

5 Q. Were you aware?

6 A. -- mean I am aware that people were out there  
7 collecting. I think I talked about media articles, but even  
8 social media --

9 Q. Sure.

10 A. I am aware.

11 Q. And -- and you've received a text from the Republican  
12 Party warning you about this. Right?

13 A. I have received that text.

14 Q. Yeah.

15 A. Yes.

16 Q. Saying that there are people out there gathering and  
17 that people should not give their personal information out.  
18 Right?

19 A. That text, yes, I received.

20 Q. And -- and did you do anything to check as to whether  
21 people were out there gathering?

22 A. Did I -- say that again.

23 Q. Did you do anything to investigate that text or the  
24 information you learned through that text?

25 A. Not -- not whether to confirm if people were



1 gathering signatures.

2 Q. All right. You are aware that the Missouri Attorney  
3 General has announced that there are folks that she suspects to  
4 be illegal aliens or undocumented immigrants gathering  
5 signatures. Correct?

6 MR. ELLINGER: Judge, I'm going to object. This is  
7 well beyond the scope of direct examination.

8 THE COURT: He -- he can cross-examine the witness on  
9 any issue that may be pertinent to the case or for impeachment  
10 purposes. The objection is overruled.

11 BY MR. HATFIELD:

12 Q. Are -- are you aware that the Attorney General has  
13 made an announcement that she is investigating or reviewing  
14 whether undocumented folks are out there gathering signatures?

15 A. I feel like I have seen this on a social media  
16 platform just in passing.

17 Q. All right. As director of elections for the  
18 Secretary of State, is that all you know about this reported  
19 allegation is that illegal people are gathering signatures in  
20 the referendum process?

21 A. That is all that I know at this time, yes.

22 Q. All right. Nobody has ever brought it to your  
23 attention.

24 A. No.

25 Q. All right. Again, I'm kind of going backwards.

1 A. Sure.

2 Q. Let's talk about certificate of insufficiency. Are  
3 you familiar with an initiative petition submitted by somebody  
4 named Mark Johnson (spelled phonetically)?

5 A. There has been initiative petitions submitted by Mark  
6 Johnson, yes.

7 Q. And I can't remember. Were you upstairs in Judge  
8 Walker's courtroom for some litigation on the Mark Johnson  
9 petition?

10 A. I don't think I was in that courtroom, no.

11 Q. Okay. You agree that in that case, the Secretary of  
12 State rejected Mr. Johnson's petition as insufficient before he  
13 submitted signatures. Correct?

14 A. That is correct.

15 Q. And that -- that was done through a letter from  
16 someone named Reinhardt (spelled phonetically). Right?

17 A. Yes.

18 Q. So when you told Mr. Ellinger that only the Secretary  
19 of State could issue a certificate of insufficiency, do -- do  
20 you agree that Mr. Johnson does not have a certificate of  
21 insufficiency?

22 A. I would have to review that particular letter, but I  
23 don't think that that was -- a certificate of sufficiency or  
24 insufficiency is based on the review of the signatures --

25 Q. Right.

1 A. -- to determine if something can be put on the  
2 ballot. And again, I probably have to review the letter that  
3 we're discussing to -- to speak to it in detail.

4 Q. Okay. Do you agree that that one was rejected  
5 because it contained multiple subjects?

6 A. That is what I do recall in general.

7 Q. And you agree that doesn't have anything to do with  
8 whether the signatures submitted count.

9 A. That is correct.

10 Q. And -- and this one. When we look at the exhibits  
11 that Mr. Ellinger showed you, particularly Exhibit 11, if you  
12 need to look at that. You rejected this one, not because of  
13 anything that is wrong with any signature. Right?

14 A. (No response.)

15 THE COURT: And we're on Exhibit 11.

16 MR. HATFIELD: We're on Exhibit 11.

17 THE WITNESS: Exhibit 11, okay.

18 BY MR. HATFIELD:

19 Q. Here in Exhibit 11, he rejected a particular  
20 initiative petition sample sheet. Right?

21 A. A rejection of the first proposed referendum  
22 petition. That is correct.

23 Q. And -- and tell us why he rejected it.

24 A. The petition is not in the form prescribed by Section  
25 116.030; and then we attached for specific details as to this

1 insufficiency in form, you may consult an enclosed opinion

2 letter.

3 Q. What was wrong with the form?

4 A. Do you want me to read the opinion letter?

5 Q. No. I want you to tell me as the director of  
6 elections and as the person that signed the letter, what was  
7 wrong with the form?

8 A. We would base the information provided from the

9 Attorney General's office.

10 Q. Okay. So on the last page of the Attorney General's  
11 opinion where Ms. Hanaway's signature appears -- are you there?

12 A. Yes.

13 Q. She writes in the last sentence, "Pursuant to Section

14 116.332.4 RSMo the Secretary of State is authorized to review

15 this opinion," and, quote, "Make a final decision as to the

16 approval or rejection to the form of the petition." Do you

17 agree with the Attorney General on that?

18 A. That would be correct.

19 Q. So at the end of the day, it's the Secretary's

20 decision as to whether to reject as to form. Correct?

21 A. It would be -- it would be something that we then  
22 issue to the petitioner.

23 Q. All right.

24 A. Yes.

25 Q. So tell me what was wrong with the form. Consult

1 whatever you need to do, and then tell me what it is about the  
2 form of the petition you rejected that was wrong.

3 A. So I'm -- I'm going to say that our office rejected  
4 this -- and yes, I did sign the letter.

5 Q. Okay.

6 A. And the petition is not in the form prescribed by  
7 Section 116.030.

8 Q. Okay. What was wrong with the form?

9 A. Again, I -- I can only speak to -- I mean without --  
10 this is -- this is in conjunction, not only with the elections  
11 division, but as mentioned before with both executive and legal  
12 staff.

13 Q. Sure.

14 A. So it was the determination of the Office that the  
15 petition is not in the form prescribed by Section 116.030.

16 Q. Okay.

17 A. And I know that I don't have an answer to the  
18 question that you just asked.

19 Q. Okay. So as director of elections, as the person who  
20 took responsibility for signing this letter to my client, you  
21 can't tell me what was wrong with the form. Is that fair?

22 A. So if I were to look at the letter by the Attorney

23 General, I can read to you what the Attorney General is

24 advising our office. And I mean, sure. It does say that we

25 have the final say that you just asked me to read, but it would

1 be based off of the information provided by the Attorney

2 General's office.

3 Q. Okay.

4 A. Do you want me to read this?

5 Q. No.

6 A. Okay.

7 Q. If I do --

8 A. Okay.

9 Q. -- I'll -- I'll -- yeah. So Mr. Ellinger asked you  
10 that too. You relied -- you relied on that letter.

11 A. That would be the position of our office is to rely  
12 on the letter.

13 Q. Okay. So you're here telling the Judge that part of  
14 the reason you made the decision was in reliance on the advice  
15 of the Attorney General.

16 A. In our normal course of business, we receive an  
17 opinion -- an opinion from the Attorney General's office, and  
18 that is the process that we take, yes.

19 Q. All right. Did you receive any other letters from  
20 the Attorney General that are not included in Exhibit 11 about  
21 this form?

22 A. Not that I am aware.

23 Q. Any other communications with the Attorney General  
24 about this form?

25 A. Not that I am aware.



1 Q. So you just sent it over. Are you generally aware of  
2 how that process works, communicating with the Attorney  
3 General's office?

4 A. So yes. In a normal --

5 Q. Okay. So --

6 A. Okay.

7 Q. -- you just sent it over, and then did you hear  
8 anything else until you got back this letter from the Attorney  
9 General?

10 A. Not that I am aware, specifically as the director of  
11 elections.

12 Q. Would you flip back and look at Exhibit 10? Exhibit  
13 10 is a letter dated September 15<sup>th</sup>, which as the evidence  
14 shows is about -- is that 11 days before Exhibit 11?

15 A. (No response.)

16 Q. Have you ever seen Exhibit 10 before?

17 A. So if I -- so if I had seen this letter, it would  
18 have -- it would have been given to the legal and executive  
19 staff.

20 Q. Okay.

21 A. Okay.

22 Q. Did you know when you signed Exhibit 11, counsel for  
23 the submitter had sent a letter specifically discussing what  
24 the Attorney General had advised and why the Secretary  
25 should -- should not accept that advice?

1 A. So when I sign letters as the director of elections  
 2 division, I am in conjunction with our legal and executive  
 3 staff. So if it was at the direction of the legal and  
 4 executive staff that we are rejecting or accepting as to form,  
 5 that is the process that I would be taking in my normal course  
 6 of business.

7 Q. I don't understand. Can -- can we read back my  
 8 question? I'm sorry.

9 THE COURT: Can you read back the question?

10 COURT REPORTER: Yes, absolutely.

11 MR. HATFIELD: Sorry, Judge. I didn't mean to -- I  
 12 apologize for that.

13 (Court reporter reads the question back off-the-record.)

14 THE COURT: Okay. We're back on-the-record.

15 BY MR. HATFIELD:

16 Q. All right. So other than sort of -- you've told me a  
 17 couple of times you can read me the letter -- you've read the  
 18 letter.

19 A. Which letter are we talking about?

20 Q. I'm sorry, good point.

21 A. Okay.

22 Q. In Exhibit 11 there is a letter from you, Chrissy  
 23 Peters. Right?

24 A. Yes.

25 Q. You're familiar with that letter.

1 A. Yes.

2 Q. And then there's a letter from the Attorney General.

3 A. Yes.

4 Q. And you've read that letter.

5 A. Yes.

6 Q. And -- and then there are a couple other letters from

7 you and letters for the Attorney General, but they're sort of

8 all of the same thing. Right?

9 A. Correct.

10 Q. So you tell me, by being familiar with those letters,

11 is it fair to say that those rejection letters in Exhibit 11

12 are because -- the reason for the rejection I should say, are

13 because the Governor had not yet signed House Bill 1 at the

14 time my clients submitted their referendum sample sheets?

15 A. That is my understanding.

16 Q. Is there any other reason, other than that, that they

17 were rejected?

18 A. Without putting in record, like me reading this

19 information, that is part of my understanding; but I feel like

20 there is more information in this opinion letter provided to us

21 by the Attorney General's office.

22 Q. Okay. And -- and we can all read that.

23 A. Okay.

24 Q. Are you -- you're not familiar with anything else,

25 other than what that letter says.

1 A. Correct.

2 Q. All right. Fair enough. Mr. Ellinger showed you  
3 intervenor's A and B I believe.

4 A. Yes.

5 Q. And you said you're familiar with those.

6 A. Yes.

7 Q. And tell me which petition A was. That is  
8 sufficient. Right?

9 A. Hold on. Exhibit A is a certificate of sufficiency  
10 of petition, that's correct.

11 Q. Okay. Let's talk about B.

12 A. Okay.

13 Q. B is a certificate of insufficiency for an  
14 initiative, submitted by Anna Fitz-James.

15 A. Initiative petition certified by Greta Bax.

16 Q. I'm sorry. Let me ask you about that one then.

17 A. Okay.

18 Q. You said that was insufficient and it turns out you  
19 were wrong about that. Right?

20 A. We issued a certificate of insufficiency, and then  
21 within ten days there was a petition to the courts. There was  
22 a certificate of sufficiency that was then provided after a  
23 review of quality control --

24 Q. Okay.

25 A. -- brought to our attention, yes.

1 Q. And -- and you and I know each other, and I'm sorry  
2 to do this to you, but --  
3 A. Yeah.  
4 Q. -- there were some passive voice things in there.  
5 After hearing the information, the Secretary decided to issue a  
6 certificate of sufficiency. Correct?  
7 A. Say that again.  
8 Q. You weren't ordered to issue a certificate of  
9 sufficiency. You decided to go ahead and issue one. Correct?  
10 A. I -- I think that there was some legal actions, and I  
11 think that there was a joint stipulation, if I'm remembering  
12 correctly, that we all agreed to. It was determined to be  
13 sufficient, if I'm remembering correctly.  
14 Q. Fair enough.  
15 A. Okay.  
16 Q. Well, which one was that again -- which exhibit?  
17 A. This --  
18 Q. Which --  
19 A. -- one is Exhibit B.  
20 Q. Okay. Let's look at A.  
21 A. Okay.  
22 Q. Who submitted the initiative in A?  
23 A. Submitted the initiative in A, Tori Schafer.  
24 Q. All right. And are you familiar with that particular  
25 initiative petition?

1 A. Yes.

2 Q. And that particular petition -- petition, also  
3 resulted in some litigation. Right?

4 A. It did, but not about sufficiency. I don't

5 Q. Right.

6 A. -- recall the details, but I -- I don't recall this  
7 being about the --

8 Q. You -- you know who Ms. Schafer is.

9 A. She's the one that submitted the petition, yes.

10 Q. And -- and the litigation was a case called ACLU  
11 versus Ashcroft. Correct?

12 A. Yes.

13 Q. And are you, as the director of elections, generally  
14 do you think you have an understanding of what ACLU versus  
15 Ashcroft instructed you to do in the future?

16 A. Not that I can recall details --

17 Q. Okay.

18 A. -- answering questions about at this point.

19 Q. Is -- is it your understanding that the Secretary's  
20 role when it comes to approving initiative petition sample  
21 sheets, is ministerial?

22 A. That is my understanding.

23 Q. And is it your understanding that the Secretary's  
24 role when it comes to reviewing initiative petition sample  
25 sheets, is not to determine the constitutionality of the



1 proposed referendum?

2 A. That is my understanding.

3 Q. Okay. And with respect then to -- let me just move  
4 on here a little bit. All right. Again, kind of bouncing

5 around to little bit. Mr. Ellinger had you look at Exhibits 8

6 and I think 12. I'm going to skip the other ones as well. In

7 Exhibit 8, when the Court looks at this there's a cover letter,

8 and there's some stuff, and then there's --

9 A. --

10 Q. -- what -- what I call a sample sheet --

11 A. Yup. A sample sheet, a signature sample sheet.

12 Q. Okay. And Exhibit 8 -- well, let's talk about that.

13 Exhibit 12 is kind of parallel; it's the same set of documents.

14 Right?

15 A. Yes.

16 Q. And you rejected Exhibit 8, and you approved Exhibit

17 12. Right?

18 A. (No response.)

19 Q. We can help you with numbers if you need us to.

20 A. Yeah. What was Exhibit 12? Is that --

21 Q. I'm going to say yes.

22 A. Yes.

23 Q. Okay.

24 A. That was the one that --

25 Q. I'm --

1 A. Yes.

2 Q. -- got to come back to Exhibit 8 and 12 --

3 A. Okay.

4 Q. -- but let's talk about these R's.

5 A. Okay.

6 Q. The R001, R002, R003, R004. The submitter, in this  
7 case Mr. Von Glahn, did he choose those numbers?

8 A. No. Those are systematic numbers provided in our  
9 process.

10 Q. And they just have to do with when it's filed.  
11 Right?

12 A. That -- I mean that is correct.

13 Q. The letters like Exhibit 8 and 12, they don't mention  
14 anything about R whatever. Like Exhibit 8 doesn't say R003,  
15 Exhibit 8 doesn't say R004. Right?

16 A. I do not recall seeing that --

17 Q. Well, take a look.

18 A. --

19 Q. I -- I just want make sure -- maybe I should ask you  
20 a better question. These letters are typical in that they  
21 don't actually use those R numbers.

22 A. Oh. So 8 and 12 is really just the submittal from  
23 the coversheet.

24 Q. Okay.

25 A. Like we don't --

1 Q. You're right.

2 A. Okay.

3 Q. Exhibit 11 doesn't use that R number --

4 A. Exhibit 11 --

5 Q. -- which is the rejection.

6 A. -- talks about a first proposed referendum petition

7 in --

8 Q. Okay.

9 A. -- that --

10 Q. --

11 A. -- proposed.

12 Q. When you communicate with the proponent, you don't

13 use those R's. Right?

14 A. Can I look real quick?

15 Q. Sure.

16 A. Just one second. Because we -- it is not showing

17 that we used the R's in any of the communications, except for

18 on Exhibit 13. We do reference -- we do reference 2026-R004 --

19 Q. Gotcha.

20 A. -- on the subject line.

21 Q. Gotcha. Okay. Let me go back to Exhibits 8 and 12

22 since I took a circle there.

23 A. Okay.

24 Q. In some pleadings that have been filed in this case,

25 your counsel has told the Court that the form that's contained

1 in Exhibit 8 -- the -- the petition -- the sample petition --

2 A. Okay.

3 Q. -- is identical to the form in Exhibit 12. Do you

4 agree?

5 A. I did not personally do the analysis, but from my  
6 understanding, our office did and there was no difference in  
7 the form.

8 Q. Right.

9 A. Okay.

10 Q. Then why did you reject 8 and not 12 if they're  
11 identical?

12 A. I think we've already discussed that; because it was  
13 rejected as to form based on an opinion for the Attorney  
14 General's office, and then on-the-record we talked about  
15 because it wasn't signed by the Governor.

16 Q. Okay. All right. A couple of cleanup questions just  
17 to make sure I've got our record straight. When you were doing  
18 the first part of your direct with Mr. Ellinger, you mentioned  
19 the counting of signatures.

20 A. --

21 Q. -- and you said something about crossed out  
22 signatures. Right?

23 A. Right.

24 Q. Do you agree that submitters can cross out  
25 signatures. Right?

1 A. Yes. That's correct.

2 Q. And -- and --

3 A. The submitters can.

4 Q. Yeah.

5 A. Like if they come to us and it's already crossed out,

6 we have a way to indicate that it was crossed out.

7 Q. Okay. And so the ones that are submitted, you are

8 never going to even consider those crossed out ones. Right?

9 A. That is correct.

10 Q. Okay. All right. Okay. Now so we know that Mr. Von

11 Glahn submitted some initiative petitions -- some --

12 A. Right.

13 Q. -- referendum petitions, very different than

14 initiative petitions, and you rejected some of those. Right?

15 A. That is correct.

16 Q. And you approved one of those.

17 A. That is correct.

18 Q. So turn to Exhibit 14, please. So this has already

19 been admitted in the record as part of the stipulation, and

20 here the Secretary of State's office submitted a press release,

21 likely drafted by Ms. --

22 A. --

23 Q. Do you agree?

24 A. Getting there. I'm sorry.

25 Q. I withdraw that question. The Secretary of State did

1 a press release. Right?

2 A. Okay.

3 Q. Is that right?

4 A. That's what I see, yes.

5 MR. ELLINGER: Judge, I'm going to object again.

6 It's way beyond the scope of what her examination was. There  
7 was no inquiry about press releases, she never testified about  
8 press releases. She only testified about the fact that she  
9 signed letters for the process petition were signed.

10 THE COURT: The objection is overruled.

11 BY MR. HATFIELD:

12 Q. All right. And this is about the approval of the  
13 referendum that we've been talking about today. Right?

14 A. Yes.

15 Q. In the second paragraph, the Secretary of State  
16 letterhead says, "The Secretary's approval authorizes the  
17 sponsor to begin collecting signatures from registered Missouri  
18 voters." Is that the position of the Secretary of State's  
19 office?

20 A. That is the position of the Secretary of State's  
21 office.

22 Q. All right. The next sentence says, "Under Missouri  
23 law, no signatures gathered before this approval date are  
24 valid." Is that the position of the Secretary of State's  
25 office?



1 A. That is the position of the Secretary of State's  
2 office.

3 Q. And the next sentence says, "And doing so constitutes  
4 a misdemeanor election offense." Is that the position of the  
5 Secretary of State's office?

6 A. That is the position of the Secretary of State's  
7 office.

8 Q. All right. So you have determined that if signatures  
9 are turned in and they're dated before approval, they are  
10 invalid. Correct?

11 A. That is the position of our office, yes.

12 Q. All right. So just to be clear then, if somebody  
13 turns in an initiative petition page that I happen to sign down  
14 here on High Street before you approved it, and I'm a  
15 registered voter, I comply with all of your counting  
16 requirements -- do you know what I mean when I say I get an R  
17 next to my name?

18 A. Yes.

19 Q. Right?

20 A. (No response.)

21 Q. That's not going to count. Right?

22 A. That is the position of our office.

23 Q. All right. And then turn to -- well, let me just ask  
24 you. And it -- it is your position that if I sign the  
25 initiative twice, I've committed another crime. Right?

1 A. That is the position of our office.

2 Q. Okay. So if my first one doesn't count, but I've  
3 already signed it, then there's no way I can sign again, unless  
4 I want to expose myself to answering to the Judge on a  
5 misdemeanor charge. Right?

6 A. That is the position of the office.

7 Q. Gotcha. So we think all of these signatures are  
8 going to be turned in this week.

9 A. Okay.

10 Q. Made arrangements to do it. What is your plan?  
11 What -- what are you going to do if you get signature pages  
12 with signatures that are dated prior to the October 15<sup>th</sup>  
13 approval letter, Exhibit 11?

14 A. Okay. So what our office will do in our portion of  
15 quality control is we will examine the petition pages for the  
16 dates in which the letters -- or the signatures were collected,  
17 and there will be a separation. So those that were collected  
18 prior to the August -- I need to make sure I'm getting my dates  
19 correctly here.

20 Q. Date of approval was October 15.

21 A. All right. So date of approval was October 15, so  
22 anything prior to that will be processed and put in a separate  
23 area to be scanned in later for preservation; and then those  
24 that have valid dates would then be scanned in and sent to the  
25 local election authorities for verification.

1 Q. Okay. So if somebody signed the initiative petition  
2 before October 15<sup>th</sup> --

3 A. Okay.

4 Q. -- you're not even going to check to see if they're a  
5 registered voter.

6 A. We will scan them in and preserve them for review.

7 And I don't know what that review looks like at this time, sir.

8 I just will -- we will just have it also scanned in for review.

9 But at this point, the ones that we are sending to the local

10 election authorities for verification during this time we will

11 be processing, will be the ones that have -- from our office's

12 position, been determined to be collected on a valid date.

13 Q. Got it. So just to make sure I got it, the ones that

14 you're talking about -- did you say segregated?

15 A. Separated.

16 Q. Separated.

17 A. Separated --

18 Q. Much better word.

19 A. Separated and still scanned in for preservation.

20 Q. Sure.

21 A. Okay.

22 Q. Good to know. So the ones that you separated will

23 not be sent to the local election authorities.

24 A. The ones that would have a date of a signature

25 collected prior to October 15<sup>th</sup>, based on our office's position

1 that they're not valid, would be separated and not scanned in  
2 with the group that will be sent to the local election  
3 authorities for verification.

4 Q. Okay. So if there are registered voter signatures on  
5 those ones that are separated and there are different  
6 registered voters -- same -- same idea though, they're both  
7 registered voters, what is your reason for treating those two  
8 people differently?

9 A. Based on the office's position of the valid dates  
10 versus the invalid date is a purpose for making a separation,  
11 but still being scanned in for a later determination.

12 MR. HATFIELD: Okay. One moment, Judge. Okay. I  
13 don't have any further questions, Judge. Thank you.

14 THE COURT: Okay. Any redirect?

15 MR. ELLINGER: Yes, Judge.  
16 (Redirect.)

17 BY MR. ELLINGER:

18 Q. I'm going to try to work a little bit backwards so  
19 it's fresher in your memory.

20 A. Okay.

21 Q. Pardon me. So let's start with the position of the  
22 Secretary of State with respect to -- I think he said  
23 misdemeanor offenses. Do you recall his worries about that?

24 A. Yes.

25 Q. Does the Secretary of State have some type of

1 independent prosecutorial power that allows them to bring in  
2 criminal cases related to signatures?

3 A. From the best of my understanding, the Secretary of  
4 State's office if determined an election offense has been  
5 committed, has -- has the authority to issue a probable cause  
6 statement to the local prosecuting attorney.

7 Q. So local prosecutor makes the decision as to whether  
8 anything occurs.

9 MR. HATFIELD: I'm going to object. Calls for  
10 speculation and lack of foundation by this witness --

11 MR. ELLINGER: Well --

12 MR. HATFIELD: -- as you can tell from the look on  
13 her face.

14 THE COURT: Overruled.

15 BY MR. ELLINGER:

16 A. I don't -- I mean I'm not -- the probable cause  
17 statement is issued to the local prosecuting attorney. The  
18 local prosecuting attorney is the one that would take next  
19 steps.

20 Q. And in fact do you understand, has the Jackson County  
21 prosecuting attorney taken a position on that?

22 A. I have seen a -- something in the media specifically  
23 about a statement that the Jackson County prosecuting attorney  
24 had stated in general, yes.

25 Q. Do you recall what that was?

1 MR. HATFIELD: Objection, it calls for hearsay.

2 THE COURT: Any response?

3 MR. ELLINGER: She's indicated she's seen a  
4 statement. She's familiar with it. I think that allows her to  
5 answer what the contents of the statement she saw was.

6 THE COURT: I'll let her answer. I'll decide what  
7 weight to give it.

8 BY MR. ELLINGER:

9 A. That they would not prosecute anybody who had signed  
10 the referendum twice.

11 Q. Do you -- do you recall opposing counsel asked you  
12 some questions about rejecting R003 but approving R004, and  
13 those specific questions?

14 A. Yes.

15 Q. And I think he asked you to indicate if they were the  
16 same, the texts of them were the same in the two referendum  
17 petitions. Do you recall that?

18 A. They were the same to the best of our analysis, yes.

19 Q. Okay. Do you recall in the past where a petition has  
20 been rejected, and then at a later date it was resubmitted in  
21 the group?

22 A. Rejected as to form.

23 Q. Yes.

24 A. Yes, that can happen.

25 Q. Do you recall an initiative petition that was



1 submitted in August of 2022, that the Secretary rejected?

2 A. Not off the top of my head.

3 Q. Mr. Basinger (spelled phonetically) filed an  
4 initiative petition.

5 A. It's sounding familiar.

6 Q. And -- and ultimately the Court said he couldn't file  
7 in that period of time because it was after the deadline to  
8 file sample pages for the upcoming November election.

9 A. I do recall this, yes.

10 Q. Okay. And do you recall whether the Court allowed  
11 him -- said that he could file for the next election cycle?

12 A. If I remember correctly, that would be the remedy  
13 that was provided.

14 Q. And if he filed the same form, would it be approved  
15 at that point if it didn't have -- if it was just filed in a  
16 timely manner?

17 A. That would be correct.

18 Q. Opposing counsel asked you some questions about  
19 striking out names and how you wouldn't accept -- wouldn't  
20 review those signatures. Do you remember that?

21 A. Yes.

22 Q. Who has -- do you know who has control over what  
23 signatures are submitted to the Secretary of State's office?

24 A. The individual or group that is submitting the  
25 signatures to our office would be the ones that determines what

1 is submitted to our office.

2 Q. They're the ones that can strike out signatures in  
3 advance.

4 A. That is what we've seen in the past, yes.

5 Q. They can choose not to submit some pages.

6 A. I'm assuming that that would be something that they  
7 could do in their course of organization.

8 Q. They can choose not to submit at all.

9 A. Yes.

10 Q. That's entirely up to their discretion. Correct?

11 A. Yes.

12 Q. Okay.

13 A. Yes.

14 Q. Is it common for people to file multiple versions of  
15 a petition with the Secretary of State's office?

16 A. We can see multiple versions of a petition filed with  
17 our office at a given time. That is -- that is common.

18 Q. Sometimes they have very little change in them.

19 A. That's my understanding, yes.

20 Q. It's possible they would have nothing changed.

21 A. That is possible, yes.

22 Q. What's important is that the full text of the  
23 measures is attached.

24 A. That is -- yes. That is a requirement.

25 Q. But each of those petitions would be separate

1 petitions.

2 A. That would be correct.

3 Q. So you talked about the process where you were going  
4 to segregate signatures for --

5 MR. HATFIELD: Separate.

6 THE WITNESS: Separate.

7 BY MR. ELLINGER:

8 Q. My apologies, separate petitions that were signed  
9 prior to your approval date. Do you recall those questions?

10 A. Yes.

11 Q. Is that because signatures before your approval date  
12 would have to be on a different petition?

13 A. No.

14 Q. Well, if they were signed on R001 -- which was  
15 rejected. Right?

16 A. That is correct.

17 Q. Those signatures would not be counted. Correct?

18 A. So because there is no -- because there is no  
19 identifying difference between R001, 2, 3 and 4, we would not  
20 have a way to turn determine which one it would be signed on.

21 So therefore, our -- when we are reviewing these petition -- or  
22 referendum pages with signatures, we will be reviewing the date  
23 in which the petitioner -- or the signature is signed at that  
24 point is -- is the best that we will be able to review at that  
25 time.

1 Q. Well, if you look at Exhibit 12 --

2 A. Okay.

3 Q. -- that's R004. Correct?

4 A. Exhibit 12 from my understanding is R004, yes.

5 Q. Then -- and what is the date that was filed?

6 A. It was filed September 29<sup>th</sup>.

7 Q. So the other petitions had already been rejected at

8 that point. Correct?

9 A. (No response.)

10 Q. If you need to, take a look at Exhibit 11.

11 A. That's correct.

12 Q. So R004 would be the first petition that was approved

13 at this point. Correct?

14 A. That is correct.

15 Q. And that was on October 14<sup>th</sup>. Correct? That's on

16 Exhibit 13.

17 A. That is correct.

18 Q. So presumably signatures on R004, collected after

19 October 15<sup>th</sup>, would be accepted.

20 A. On October 15<sup>th</sup>.

21 Q. Yes.

22 A. Yes. They would be accepted and moving forward -- or

23 they would be determined to be valid and processed and sent to

24 local election authorities for review.

25 Q. Not valid as in, they are actual signatures of

1 registered voters, just --

2 A. Valid as in the date in which they were collected.

3 Q. And if it turns out after processing all the  
4 signatures and getting the returns from the local election

5 authorities that there aren't enough signatures, what action  
6 would the Secretary of State's office take?

7 A. At this time I would -- I would not know at this time  
8 what the action would be. I -- that's just -- we will have to

9 see where we -- you know, where we're at and I would confer  
10 with legal executive staff.

11 Q. And that's because no final decision has been made.  
12 Has it?

13 A. No.

14 MR. ELLINGER: No further questions, Judge.

15 THE COURT: Any recross?

16 MR. HATFIELD: Two -- two things.

17 (RE CROSS.)

18 BY MR. HATFIELD:

19 Q. Number one, there has been a final decision on  
20 whether the petitions comply as to form of the statute.

21 A. With that letter.

22 Q. Yes.

23 A. Yes.

24 Q. Okay. And number two, when I was doing my --

25 MR. HATFIELD: Sorry, Judge.

1 BY MR. HATFIELD:

2 Q. When I was doing my cross, I said approval of the  
3 15th. Mr. Ellinger is correct. Approval was on the 14<sup>th</sup>--

4 A. The 14<sup>th</sup>.

5 Q. But just to be clear -- you go. You started to say.

6 A. The 14<sup>th</sup> is when you have your approval to form --

7 Q. Yes.

8 A. Yeah. So the signatures collected on the 14<sup>th</sup> -- I

9 think we did say on-the-record the 15<sup>th</sup>, but on the 14<sup>th</sup>,  
10 moving forward would be what is -- is considered valid based on

11 our office's position. They will be processed in the group

12 that will be sent to the local election authorities for

13 verification that they're registered to vote.

14 Q. All right. I'm going to say it again for the folks  
15 in the back --

16 A. Okay.

17 Q. -- just to make sure that we've got this down.

18 A. Yes.

19 Q. What you're going to do, is if a signature is dated  
20 October 14<sup>th</sup>, that will go to the LEA's and be processed.

21 A. The 14<sup>th</sup> moving forward.

22 Q. And it will -- it will not be rejected, solely  
23 because of the approval time.

24 A. Solely because of the date in which it was signed,  
25 that may be.



1 Q. Right.

2 A. But prior to our approval to form on October 14<sup>th</sup>.

3 Q. But a signature that was taken on October 13<sup>th</sup> will

4 be rejected, solely because of the approval time.

5 A. It is going to be separated and scanned in for review

6 at a later time, but not sent --

7 Q. So you are --

8 A. -- out --

9 Q. So you are going to review it.

10 A. It will be separated later for review at a separate

11 time, not sent out to the local election authorities for

12 verification if they're registered to vote or not registered to

13 vote. So at this point, I can just say it's going to be

14 separated and scanned in for review later.

15 Q. So when the Secretary said in the press releases, you

16 said it's your position that anything gathered before approval

17 is invalid, are you sticking to that?

18 A. Which is why we're not sending them out for the local

19 election authorities to --

20 Q. Got it.

21 A. -- to review for verification of registered to vote

22 or not registered to vote.

23 MR. HATFIELD: Got it. Thank you. No other

24 questions, Judge.

25 THE COURT: May this witness be excused?

1 MR. ELLINGER: Yes, Judge.

2 THE COURT: You can step down, thank you.

3 THE WITNESS: Okay.

4 THE COURT: You're free to say or free to go if you'd  
5 like.

6 (Witness steps down from the stand.)

7 MR. ELLINGER: Judge, we've been going for a couple  
8 hours. Can we take a five minute break?

9 THE COURT: I think that's a good idea. Okay. Let's  
10 take a ten minute recess. We are in recess, thank you.

11 MARSHAL: All rise.

12 (Brief recess.)

13 THE COURT: We are back on-the-record. Any further  
14 evidence for intervenor?

15 MR. ELLINGER: Real quick, Judge, can I confirm  
16 intervenor's Exhibit A and B were both admitted? I think they  
17 were, but I just want to make sure.

18 THE COURT: Yes, that's my recollection.

19 MR. HATFIELD: There's no admission -- no objection  
20 to the admission.

21 THE COURT: If they weren't already, they are now.

22 MR. ELLINGER: And, Judge, at this time I would renew  
23 my objection to the admission of the joint stipulation of facts  
24 from October 28<sup>th</sup>, in particular reference to paragraphs 23, 29  
25 and 32, which have to do with the signature numbers. As we

1 discussed earlier, there is no evidence to support that.

2 THE COURT: Which exhibits within the exhibit are we  
3 talking about?

4 MR. ELLINGER: They're not exhibits within the  
5 exhibit. They're actually --

6 THE COURT: Oh --

7 MR. ELLINGER: --

8 THE COURT: I'm sorry.

9 MR. ELLINGER: And to that extent, I would say  
10 there's no evidence in the record reflecting when they started  
11 gathering signatures or the amounts of signatures which they  
12 have gathered. Those are those three paragraphs in general.  
13 The best evidence of that would be either the petition pages  
14 themselves -- would be the petition pages themselves, the ones  
15 that have not been produced and we've already discussed with  
16 respect to the motion for sanctions. And on that basis, there  
17 is no evidence to reflect those stipulations, and we would  
18 again renew our objection to those stipulations.

19 THE COURT: Any response?

20 MR. HATFIELD: Well, Judge, just briefly, just  
21 because I'm not sure we really talked about it. On Thursday  
22 you heard arguments on the motions to compel. Attached to  
23 those motions to compel are plaintiffs responses to  
24 interrogatories about these numbers that -- that Mr. Ellinger  
25 has just raised, stipulation paragraphs 23, 29 and 32. And as

1 we say in the answers to interrogatories, the reasons those  
2 were in that stipulation that says we all agree they're  
3 necessarily relevant or necessary because Mr. Seidleck sent me  
4 an e-mail and asked if the Plaintiffs would tell them how many  
5 signatures had been gathered at those times, and we -- and we  
6 did. So I kind of feel like I'm being punished now for trying  
7 to cooperate with the Attorney General's office and agreed to  
8 send numbers that we weren't even sure were necessary to the  
9 case. So that's why those numbers are in there. They are  
10 something the Secretary agreed to stipulate to, and we think  
11 it's proper to have them in the record, but that's all I can  
12 offer on that, Judge.

13 THE COURT: So could you restate your objection?

14 MR. ELLINGER: I object to the admission of the joint  
15 stipulation of facts of October 28, 2025. It's --

16 THE COURT: With regard to which paragraphs?

17 MR. ELLINGER: I was going to say in particular with  
18 respect to paragraphs 23, 29 and 32.

19 THE COURT: I'm going to overrule the objection. I'm  
20 going to decide what weight to give those specific paragraphs.

21 MR. ELLINGER: Thank you, Judge. With that,  
22 intervenor would rest his case.

23 (Intervenor rests.)

24 THE COURT: Okay. Any further evidence for -- or  
25 well, is there any rebuttal evidence?

1 MR. HATFIELD: There is not, Judge.

2 THE COURT: Okay. And for the record, we have  
3 concluded with evidence. We will now proceed to arguments from  
4 the parties. Are we ready to proceed on that note?

5 MR. HATFIELD: We are, Judge.

6 THE COURT: Okay. Petitioner may go first.

7 MR. HATFIELD: Thank you, Judge, given the time and  
8 the temperature of the room, I will do my best.

9 THE COURT: You know how these old courthouses get.

10 (Argument on behalf of plaintiffs.)

11 MR. HATFIELD: I have demonstrative PowerPoint, which  
12 I have distributed to the other counsel as well. I will let  
13 the Court know that I'm going to go through these in order.

14 So the page that has number two at the bottom of it,  
15 you simply have some dates for Your Honor to see what the  
16 stipulated evidence already shows. So as you can see from  
17 that, this is what happened: On Friday September 12<sup>th</sup>,  
18 the General Assembly truly agreed and finally passed House

19 Bill 1. That is a stipulated fact, that happened. On

20 that day, my clients, specifically Richard Von Glahn,  
21 submitted referendum petitions, two of them, the -- at  
22 different times during the day. The Secretary of State  
23 has assigned those numbers for what I would consider  
24 administrative purposes R001 and R002.

25 We are not here about those because in spite of the

1 Secretary's position, they are not the same as the others.  
 2 Numbers one and two are slightly different, so that's not  
 3 the issue. On Monday September 15<sup>th</sup>, we submitted what  
 4 they call our three, which is -- I believe Exhibit -- oh  
 5 it's on there, Exhibit 8. So that's what we kind of  
 6 talked about. That's the one -- one of the ones that was  
 7 rejected. And so we then, after this correspondence Your  
 8 Honor has seen --

9 THE COURT: Just to be clear, as to R001 and R002,  
 10 that's not -- they're not part of the referendum petitions that  
 11 you reference to in plural in your amended petition. Correct?

12 MR. HATFIELD: So technically it probably says all of  
 13 them, but I'm telling the Court --

14 THE COURT: I don't know that it does.

15 MR. HATFIELD: Okay.

16 THE COURT: I think it just says referendum  
 17 petitions, but I could be wrong. I was trying to read through  
 18 that earlier and I --

19 MR. HATFIELD: Well, just to be clear again, numbers  
 20 001 and number 002 are not identical to numbers 003 and 004.  
 21 And we are not asking Your Honor to do anything about numbers  
 22 001 and 002.

23 THE COURT: So as to your amended petition, we're  
 24 just focused on 003 and 004.

25 MR. HATFIELD: That's correct.



1 THE COURT: All right.

2 MR. HATFIELD: That's correct.

3 THE COURT: All right. That was a question that I've  
4 been kind of chewing on for a couple of days. I appreciate  
5 that clarity.

6 MR. HATFIELD: Yup.

7 THE COURT: Okay. I'm sorry. Go ahead.

8 MR. HATFIELD: So I'm going to talk about in the next  
9 two slides what we call the 90 days that the petitioner has to  
10 gather signatures on a referendum. I'm going to explain that  
11 to you, but on this chart -- so the 90 days, I'll explain to  
12 you why, starts on September 12<sup>th</sup>. That gives you until  
13 December 11<sup>th</sup>, which is later this week. Under the Secretary's  
14 statements and positions as we just went over with the witness,  
15 the office's position, if we have to wait until approval on  
16 October 14<sup>th</sup> for any signature to be counted valid, that takes  
17 you down to 58 days is all you've got left to gather  
18 signatures. Now we say that we had from September 15<sup>th</sup>, the  
19 day we submitted the second referendum -- that's that second  
20 orange box, that Monday. That would give us 87 days.

21 So there are a couple of issues that I'm going to  
22 circle back to at the very end that you have to decide.

23 So do we have 58 days together, do we have 87 days  
24 together? In the middle of that, there's a little bit of  
25 a dispute about whether you can count a signature on a

1 form that is dated the day the form was submitted or do  
2 you have to wait the two weeks for the approval. I've got  
3 a slide on that at the end to help clarify.  
4 All right. So slide 3, Article 3, Section 52(a),  
5 I've highlighted their referendum petitions, "shall be  
6 filed not more than 90 days," so when you heard the  
7 motions to dismiss, somebody argued, I don't remember who,  
8 well, that doesn't really say you have 90 days to gather.  
9 That just says that you have to turn it in at 90 days, but  
10 that's okay. The Supreme Court has talked to us about  
11 that on the next slide, which is slide 4.  
12 No Bans on Choice versus Ashcroft. I don't remember  
13 exactly where Your Honor was during this time, but this  
14 was when the -- I believe the Attorney General refused to  
15 certify the auditor. I'm going from memory here --  
16 THE COURT: I was here.  
17 MR. HATFIELD: You -- you were on the bench. So  
18 there was No Bans on Choice versus Ashcroft that came to the  
19 circuit court. I believe this was Judge Beetem's case. The  
20 Missouri Supreme Court said in 2022, the full signature  
21 collection period is only 90 days. And then they said at the  
22 end in that case, these statutes have changed, but if there's a  
23 statute that shortens your 90 days, it's unconstitutional and  
24 you've got to find it unconstitutional. We're not asking you  
25 to do that. You don't need to declare any statutes

1 unconstitutional here, but we are asking you to consider No  
2 Bans on Choice and interpret all of the statutes in a way that  
3 gives us 90 days. Avoid any questions of unconstitutional --  
4 unconstitutional -- unconstitutionality.

5 The State's position and the Intervenor's position is  
6 apparently that the politicians can dicker around with  
7 their decisions, and deny you part of your 90 days.  
8 That's contrary to ACLU, and my client -- Peoples'  
9 position is that that is not the case and you should  
10 follow the Supreme Court. This case is a great example of  
11 why their position cannot be true. Your Honor may know  
12 that generally the Governor has 90 days of a session to  
13 sign a bill. We also have 90 days to gather signatures.  
14 If the Governor decides to wait and not sign the bill,  
15 their position would be that we don't have any days to  
16 gather signatures because, as you just heard, their  
17 position is that until the Governor signs the bill, you  
18 can't do a referendum. So it's just complete nonsense to  
19 suggest that we have to wait.

20 I'm going to tell you more about that. Okay. On  
21 page 5, this is all a bunch of stuff we talked about on  
22 Thursday. Count 1 simply asked you -- this is -- this is  
23 a cut and paste from our petition -- to declare the  
24 plaintiff referendum sample sheets -- I don't know if this  
25 is what you were talking about, but we weren't precise

1 there -- are valid as to form because they substantially  
2 comply with the requirements of Section 116.230.

3 THE COURT: And to be specific, whenever you say  
4 plaintiffs' referendum sample sheets, you're talking about R003  
5 and R004.

6 MR. HATFIELD: Correct, correct. So all you gotta do  
7 there, is look at the joint exhibits, compare that page in  
8 Exhibit 8 to that page in Exhibit 12. The witness just  
9 testified, as you will find when you review the evidence,  
10 they're identical and you can't tell them apart. The  
11 Secretary's brief on at page 15 appropriately agrees to that.  
12 The referendum petition sample sheet submitted before the  
13 governor signed House Bill 1, and the one approved as to form  
14 October 14<sup>th</sup> of 2025, are identical, and they tell you to  
15 compare, and then they've got 8 and 12 in there. Again, with  
16 respect to -- they happen to be wrong about 004 and 005, but it  
17 doesn't matter anymore. So -- but 8 and 12 are identical and  
18 they've admitted that.

19 So that is what we're asking you to do; declare it  
20 complied as to form. The first thing is Secretary of  
21 State has already said they're identical, and they  
22 approved 12 as to form. That decision was correct. On  
23 the next slide, you'll see the statute that governs this.  
24 It says, "The following shall be substantially the form of  
25 each page of referendums. If this form is followed

1 substantially in the requirements of Section 050 and 080  
2 are met, it shall be sufficient. Disregarding clerical  
3 and merely technical errors." Now the ellipsis -- those  
4 are ellipsis, those little dots, that's just a picture of  
5 the form. And when Your Honor compares the picture of the  
6 form that's in 116.030 and the forms that we've got,  
7 they're identical.  
8 So the statutes lay it out. That's what my clients  
9 used; the forms, both 3 and 4, needed to be approved.  
10 Exhibit 8 was not approved as to form, and we want a  
11 declaration under 536.150, the non-contested case rules,  
12 that it should have been, and we want Your Honor to say it  
13 complied.  
14 THE COURT: And to be clear, Exhibit 8 is with regard  
15 to R003.  
16 MR. HATFIELD: Correct.  
17 THE COURT: And to be clear that these arguments  
18 pertain to Count 1 of your amended petition.  
19 MR. HATFIELD: Correct. And now Count 2, page 8. In  
20 Count 2, the relief requested at the end, declared that  
21 signatures may be gathered once a sample sheet is submitted to  
22 the Secretary of State. And it said, "Signatures may not be  
23 rejected because they were gathered prior to the Secretary  
24 issuing an approval of the sample sheet." So in other words,  
25 you're -- if you gather a signature on a date on which -- or

1 right after you've given it to the Secretary, you could -- that  
2 signature is valid, even if it takes Secretary 15 days to  
3 approve it. So that is what C says.  
4 And then D, "Prohibit the Secretary or anyone acting  
5 in concert with him from rejecting the referendum petition  
6 sheets on the basis that the Governor had not signed House  
7 Bill 1." So they can reject them on any other basis. I  
8 mean obviously if you have signatures from folks who  
9 aren't registered to vote, we're not asking for  
10 declarations on that. There's no evidence -- there's  
11 nothing to consider there. All we can consider is whether  
12 the fact that these petition pages were not approved when  
13 they should have been, invalidates the signatures.  
14 All right. Page 9, just to be clear and you heard  
15 the testimony, it is the position of the Secretary of  
16 State, and I -- I -- Judge, you heard some arguments on  
17 Thursday about this. I went back and I looked at the  
18 nurse anesthetist case, and then I looked at the  
19 Department of Corrections case that someone, I don't  
20 remember who, claims somehow modifies that decision. It  
21 certainly doesn't overturn that decision, it never says  
22 that it does. Missouri Nurse Anesthetists is good law.  
23 The issue in that Corrections case is, was it really a  
24 final decision? Had they really thought about it and made  
25 a determination or was it still sort of in process and



1 they had to really settle?

2 I mean Your Honor is going to have to decide, but we  
3 have a live dispute under the declaratory judgment act.

4 The Secretary's statements have been extremely clear, and  
5 you heard from the witness that that is the position of  
6 the Office. There's no evidence that the Secretary have  
7 changed his mind from the press releases that he put out,  
8 and today -- you heard his position as of -- as of today.

9 And by the way, if he has changed his mind and he is  
10 going to count the signatures, that would be great. I

11 would love to hear that evidence, and then the case would  
12 be moot. We have presented a prima facie case that this  
13 is his position, and I don't think there's any dispute  
14 about that.

15 The record is his position is that no signatures  
16 before the approval date are valid, and that's wrong.  
17 And -- and --

18 THE COURT: The approval date being October 14<sup>th</sup>.

19 MR. HATFIELD: That -- yes, the day before this press  
20 release that you're seeing on this slide. So his -- his press  
21 release says the referendum has been approved, and no  
22 signatures before that approval can be counted as well. And  
23 then in Exhibit -- the next day, so the 15<sup>th</sup>, he said, "By the  
24 way, it's a crime to sign twice," which is another reason that  
25 we have a live dispute here that we need Your Honor to -- so

1 substantively page 10, before a constitutional amendment  
2 petition, a statutory initiative petition or a referendum  
3 petition -- petition may be circulated for signatures, a sample  
4 sheet must be submitted. That is all that is required. It  
5 says, "Before you circulate for signatures, submit a sample  
6 sheet." That implies on its face that once you do it, you may  
7 be -- you may circulate for signatures. But more than just  
8 imply, there is no statute that says to the contrary. All it  
9 says is you submit the sample sheet, and then the petition may  
10 be circulated for signatures. So that is why their decision  
11 was wrong.

12 Next on page 11, if there's any doubt, under ACLU  
13 versus Ashcroft, the Secretary had no authority to reject  
14 on the basis that the witness just explained to you, they  
15 used for their rejection. There was nothing wrong with  
16 these forms. When you look at Exhibit 12, that's clear;  
17 same as Exhibit 8. There's nothing wrong with these  
18 forms. The rejection was based solely on this idea that  
19 the Governor had not yet signed. Under Ashcroft, "We  
20 conclude that the Secretary of State's authority to review  
21 a referendum petition sample sheet for sufficiency is  
22 limited to determine whether the sample sheet," that's an  
23 important phrase by the way. Statutes sometimes use  
24 petition pages interchangeably, "but with a sample sheet  
25 is a substantially form required, and if it is, shall be

1 deemed sufficient." If there's any doubt about how that  
2 applies to this case, on the next page 12, the -- the  
3 Missouri Court of Appeals Western District said, "A  
4 declaratory judgment is entered in favor of the -- and  
5 against the Secretary of State and the Attorney General."  
6 The next sentence, "Neither the Secretary of State nor the  
7 Attorney General had the authority to reject the sample  
8 sheet on constitutional grounds." Now I'm a little  
9 unclear under -- over who the Secretary claims made this  
10 decision. The statute is pretty clear that it's their  
11 decision, not the Attorney General's, but it doesn't  
12 matter. Neither one of them have the authority to reject  
13 it on constitutional grounds. And when you read the  
14 Attorney General's letter that are part of Exhibit 11 --  
15 11, you'll see that that's why it's being rejected.  
16 THE COURT: And you're making this argument for the  
17 proposition that signatures that began to be collected after  
18 the submission of sample sheets for R003 and R004, you want me  
19 to declare that they should be counted --  
20 MR. HATFIELD: That's correct.  
21 THE COURT: -- once submitted.  
22 MR. HATFIELD: Yes. That's correct because it should  
23 have been approved. The only reason that it was not approved,  
24 as the Attorney General says, which apparently the Secretary  
25 has adopted, is that petitions, quote, "must conform to the

1 provisions of Article 3, Section 50 of the Missouri  
2 Constitution." And -- and so they can't do that under ACLU  
3 versus Ashcroft, and they're just wrong. Even if they could do  
4 it, they're just completely wrong, which is kind of the debate  
5 that has been going on outside of this courtroom sometimes.

6 Article 3, Section 49, "The people reserve power to  
7 propose or reject laws and amendments to the constitution  
8 by the initiative." There it uses laws. Then notice the  
9 "or" which I hopefully put in red, and then the next  
10 phrase says, "Reject by referendum any," what? Not law,  
11 using a different phrase, "Act of the General Assembly  
12 except as hereinafter provided." Page 14 I'd rather  
13 cheekily point out that the bill says it's an act of the  
14 General Assembly.

15 On page 15, you see the statute again that we've  
16 already talked about. "Referendum petition may be  
17 circulated for signatures, sample sheet must be  
18 submitted," that happened. And then we've given you a  
19 little bit more law under United Labor versus Kirkpatrick,  
20 which is a very old case from 1978. The uppermost  
21 question is whether or not the statute makes a specific  
22 irregularity fail. In other words, if the state cannot  
23 point to the statute that says these signatures do not  
24 count, they count. So I've got a statute that says,  
25 "Before you gather, you submit to the secretary." That's

1 all I need. They need to point to a statute that says  
2 these signatures don't count for some reason. And there  
3 are statutes that say fraudulent signatures shall not be  
4 counted, signatures gathered -- I'm sorry, signatures of  
5 folks who are not registered voters cannot be counted.  
6 There are even some things about circulator registration  
7 that are likely unconstitutional, but those shall not be  
8 counted.  
9 So on the next page, I just want to break this down a  
10 little bit for Your Honor because there are some nuances  
11 to this. So our position is -- what -- whatever we've  
12 labeled it at the top -- option one. We don't need the  
13 Governor's signature on something to seek a referendum on  
14 it, nor do we need the Secretary of State's approval to  
15 gather signatures. That means a declaration at the page  
16 submitted on September 15<sup>th</sup> complied as to form, and  
17 the -- that the Secretary of State may not declare  
18 signatures invalid, solely because they can take  
19 signatures on or after that date, September 15<sup>th</sup>.  
20 Option two is that the Governor's signatures is not  
21 required, so you agree with us on the constitutional  
22 issue, but that the Secretary's approval is required on  
23 the form, and that they can shave 15 days off by taking  
24 the full 15 days to approve, which they did. If that's  
25 true, then on our option two, signatures gathered on or

1 after September 26<sup>th</sup>, the date the Secretary should have  
2 approved what we call R003. All right. Then you get the  
3 Governor's signature.  
4 Then their position -- well, their position is that  
5 the Governor's signature is required, so we've submitted  
6 new sheets, R004 they call it, after the Governor's  
7 signature because we wanted to be safe. And if that's  
8 true, then we believe that -- if it would require the  
9 Governor's signature, then we believe that every signature  
10 gathered on September 29<sup>th</sup> or later should be counted.  
11 And under their position, we need both the Governor's  
12 approval list -- signature on the bill, and approval as to  
13 form; and that means that no signatures can be counted  
14 unless they were gathered on October 14<sup>th</sup> or later; which  
15 again cuts us down, going back to the first principle, to  
16 50 something days to --  
17 THE COURT: To 58 days.  
18 MR. HATFIELD: To 58 days. So we'd like you to  
19 declare the September 26<sup>th</sup> rejection as unlawful; deem that the  
20 sample sheets submitted on the 15<sup>th</sup>, sometimes called R001 or  
21 Exhibit 8, is approved as to form -- should have been approved  
22 as to form on that date; and then enjoin the Secretary of State  
23 from invalidating signatures gathered after September 15<sup>th</sup> --  
24 on or after September 15<sup>th</sup>, solely because they were collected  
25 prior to the Secretary's approval.



1 And, Judge, to the extent we haven't been clear, I  
2 would recommend that your order make extremely clear that  
3 you are not making judgments on whether the Secretary may  
4 reject a signature for any other reason at all. All we're  
5 talking about here is this "as to form" sample sheet  
6 thing. So you're not validating any signatures, you're  
7 not saying anything about other criteria the Secretary  
8 uses. You may get to weigh in on some of those some other  
9 day, but all we're asking you to do is make declarations  
10 about these approvals, and declare that my client doesn't  
11 need the approval of the government in order to exercise  
12 their First Amendment right and gather lawful and valid  
13 signatures.

14 THE COURT: Let me ask you about the relief you are  
15 asking for in Count 1 again. Are you asking for me to declare  
16 -- I mean R004 -- I mean really I said Count 1 applies to  
17 really R003 and R004, but really it just applies to R003.

18 MR. HATFIELD: Yeah. That's right. That's --  
19 that's -- that's fair.

20 THE COURT: Okay. Because R004 had the Governor's  
21 signature prior to the --

22 MR. HATFIELD: Right.

23 THE COURT: -- sample sheet was filed. So you're  
24 asking for that declaratory relief as to R003 that the sample  
25 sheet is valid --

1 MR. HATFIELD: Right.

2 THE COURT: -- for the purposes of them being able to  
3 count the signatures --

4 MR. HATFIELD: Right.

5 THE COURT: -- for that referendum. Okay.

6 MR. HATFIELD: And then where R004 comes into play --  
7 you're -- you're absolutely right. I agree with everything you  
8 just said. Where R004 comes into play, their play is their

9 position -- petition -- position is that two weeks between when  
10 we submitted and when they approved, those don't count either.

11 THE COURT: Right.

12 MR. HATFIELD: And so --

13 THE COURT: Between September 29<sup>th</sup> and October 14<sup>th</sup>.

14 MR. HATFIELD: Bingo.

15 THE COURT: Or September 30<sup>th</sup> -- well, one of the  
16 two. I'm tracking.

17 MR. HATFIELD: Yes, sir. It's September 29<sup>th</sup> and  
18 October 14<sup>th</sup>. You are correct. You're tracking. Whatever it

19 is, it is. That's all I have. I'm happy to answer any  
20 questions.

21 THE COURT: Just give me one second here.

22 MR. HATFIELD: Of course.

23 THE COURT: So the declaratory relief you're asking  
24 all one of the declaratory relief, you're asking -- well, one  
25 of the declaratory reliefs, you're asking -- or as to R004, is

1 that the signatures can start to be counted from the date that  
2 the sample sheet was filed?

3 MR. HATFIELD: Correct.

4 THE COURT: Another part of the declaratory relief  
5 for R004 and potentially R003, should I find that the sample  
6 sheet was valid is that R003 signatures can start to be counted  
7 whenever the sample sheet was filed.

8 And then you want declaratory relief as to R003 and  
9 R004, should I find R003 to be a valid sample sheet. You  
10 want me to declare that the Secretary cannot reject  
11 signatures within that specific time period because of  
12 that time period. Furthermore, you want me to declare  
13 that the Secretary cannot reject signatures because they  
14 may or may not be a crime.

15 MR. HATFIELD: I mean if you give the -- you  
16 described the first part 100 percent.

17 THE COURT: Okay.

18 MR. HATFIELD: If you give the first judgment -- I'm  
19 not asking you to make declarations about crimes. I'm -- I'm  
20 telling you that the reason we need a declaration about whether  
21 those count -- I mean I gave a hypothetical that isn't that  
22 hypothetical. I -- I might have signed during the period --  
23 you know, that -- that they now say they won't count my  
24 signature. So the reason that I'm suggesting we need that  
25 judgment is so that people know whether they can sign again.

1 THE COURT: So how I had it at first, without going  
2 into the --

3 MR. HATFIELD: Yes.

4 THE COURT: -- crime part, that sums up everything.

5 MR. HATFIELD: That is -- it is.

6 THE COURT: Okay.

7 MR. HATFIELD: That sums it up. You -- you nailed  
8 it, Judge.

9 THE COURT: All right.

10 MR. HATFIELD: I should have done a slide just like  
11 you said.

12 THE COURT: No. We all have our own ways of  
13 explaining things. No. I just want to make sure that I've got  
14 my head fully wrapped around the -- the relief that you want  
15 for which things, and what type of relief for which things that  
16 are contingent upon other rulings.

17 MR. HATFIELD: We do.

18 THE COURT: Okay.

19 MR. HATFIELD: Thank you, Judge.

20 THE COURT: Great. Thank you. All right. Which  
21 respondent would like to go first?

22 (Argument on behalf of defendant.)

23 MR. SEIDLECK: I'll go first. Thank you. May I  
24 please the Court?

25 Before beginning, I would just like to say for the  
112

1 record that the state stands by its earlier filed pretrial  
2 brief. Regardless of procedural posture of the exact  
3 nature of the record as we determined it turns out, the  
4 merits favor judgment for the defendant.

5 Once again, we are here because the Plaintiffs claim  
6 that the Secretary's actions are obstructing their  
7 referendum efforts, but what this case is really about is  
8 plaintiffs' failure to follow well established rules and  
9 systems, designed to ensure an orderly referendum process.

10 We're effectively discussing the state version School  
11 House Rock: What's a bill versus a law?

12 Article briefs, Section 49, and it's implementing  
13 provisions make clear that referenda are for rejecting  
14 laws. The Court should therefore reject plaintiffs'

15 claims if it indeed reaches the merits. There are --  
16 there is also still the pending motions for dismissal and  
17 judgment on the pleadings. For plaintiffs' Count 1, which  
18 claims that the Secretary illegally rejected their sample  
19 sheets, we continue to believe that is moot. For Count 2,

20 which argues that the Secretary must count signatures  
21 collected prior to approval of the referendum sample  
22 sheet, we again believe that that is not ripe. And  
23 plaintiffs, as I mentioned, their claims should fail on  
24 the merits under the Missouri Constitution. You can only  
25 have a referendum on an enacted law. We'd submit that

1 there's no law without the Governor's signature. Thus,  
2 the Secretary properly rejected premature sample sheets  
3 and no signatures can be counted before there was a valid  
4 referendum petition.

5 Beginning quickly with mootness. When the Secretary  
6 proved as to form, plaintiffs most recently submitted  
7 sample sheet on October 14<sup>th</sup>, this case became moot. As  
8 plaintiffs admit in their pretrial brief on page 6, this  
9 petition is identical to previously submitted sample  
10 sheets. Plaintiffs further admit on page 6 of their  
11 pretrial brief that this is no longer an issue.

12 Plaintiffs have their requested relief, they have an  
13 approved -- approved as to form petition, and there is no  
14 more effectual relief that this Court can offer. So any  
15 decision here is unnecessary.

16 In arguing against dismissal, plaintiffs put a lot of  
17 emphasis on the possibility of a case like this recurring.  
18 Plaintiffs are referring to the so called public interest  
19 exception to mootness. For that exception to apply, the

20 issue must: One, be of general public interest and  
21 importance; two, will reoccur; and three, will evade  
22 appellate review in future live controversies. This  
23 public interest exception however does not apply here.

24 Assuming that this issue is of general public importance,  
25 plaintiffs have not shown that this issue will reoccur.



1 As the Western District said in the Jackson County board  
2 of election commissioners ex rel. Brown versus City of  
3 Lee's Summit case, plaintiffs must, I quote, "Point to  
4 circumstances, which take the possibility of recurrence  
5 out of the realm of pure speculation," end quote.

6 Plaintiffs say the disputes about referendum  
7 petitions are common. That's certainly true, but that  
8 inflates the test beyond the Secretary's argument. Our  
9 specific point is that there's no non-speculative reason  
10 to believe that future proponents will be so brazen as to  
11 submit a referendum petition on an unsigned bill.

12 Plaintiffs haven't carried their burden in showing that  
13 this is a common legal quagmire that needs redressing.

14 Even then, plaintiffs have not shown this controversy is  
15 of such limited duration, that it will evade appellate  
16 review and future controversies. For example, in ACLU  
17 versus Ashcroft, both this Court and the Western District  
18 issued rulings within 32 days of the ACLU filing its  
19 petition. This is less than the 45 days that the Governor

20 has to sign a bill for adjournment. Additionally the ACLU  
21 had noted, quote, "the urgency of time," in that case,  
22 allowing for review of this election related controversy  
23 on an expedited basis. The plaintiffs here have never  
24 requested anything like a temporary restraining order, an  
25 agreement to submit this case on the papers, or other

1 means of ensuring that this case could get at least  
2 preliminarily decided rapidly. So it would be  
3 incongruence to allow them to now proceed under the theory  
4 that this controversy would evade appellate review.

5 Turning to ripeness and the signatures. Plaintiffs  
6 claim is not ripe. Plaintiffs have not filed their  
7 referendum petition with the Secretary of State, so any  
8 fear about future signatures turns on a hypothetical  
9 future injury. Any number of things could happen;  
10 plaintiffs could fail to gather the required number of  
11 signatures; they could also gather -- gather a sufficient  
12 number of signatures, after the Secretary's approval, such  
13 that any signatures gathered beforehand would be necessary  
14 and therefore relevant -- unnecessary and therefore,  
15 irrelevant; and plaintiffs' referendum could be ruled a  
16 violation of the US Elections Clause in a federal pending  
17 case; or plaintiffs could submit signatures gathered  
18 before approval, and need them to meet -- excuse me --

19 they could meet -- they could meet the constitutional  
20 threshold as I mentioned, without needing the signatures  
21 contested here. Thus, we again for the reasons stated in  
22 our brief, submit that plaintiffs claim on Count 2 is  
23 moot.

24 Turning to the merits in Count 1. Even if this Court  
25 disagrees and decides plaintiffs' claims are justiciable,

1 plaintiffs' claims do not succeed on the merits.

2 Beginning with plaintiffs' claim that the Secretary

3 improperly rejected the three sample sheets he submitted

4 before the Governor signed House Bill 1 into law, the

5 Missouri Constitution and statutes only allow a referendum

6 on laws, not on un-enacted bills. Statutes implementing

7 the referendum process are presumed to be constitutionally

8 valid; that comes from the No Bans on Choice case. As the

9 Missouri Supreme Court has long held, a statute is only

10 unconstitutional if it, quote, "Interferes with or

11 impedes," end quote, a right to a referendum. That again

12 is from No Bans on Choice.

13 Starting with the statute, both sides agree that

14 Section 116.030 is the relevant statute. It, quote,

15 "Effectively defines what was sufficient as to form."

16 Section 116.030 explicitly codifies that it only permits a

17 referendum on a, quote, "law." This is -- and this

18 appears in two places: First, it permits a referendum on,

19 and I quote, "any law passed by the General Assembly," end

20 quote. Two, in filling out the form, there is a blank

21 spot for the petitioner to supply the, and I quote, "title

22 of the law," end quote. This Court must give effects to

23 the General Assembly's chosen words. My friends on the

24 other side argue that nowhere does section 116.030,

25 reference the Governor's signature, and that comes from

1 the pretrial brief. He is correct about that, but when  
2 the Governor signs a bill, it becomes a law. It would be  
3 nonsensical for the General Assembly to have explicitly  
4 written the Governor's signature as required, into the  
5 statute. Moreover, a bill can also become law if the  
6 Governor fails to act on it within a constitutionally  
7 allotted time. So it makes sense that the General  
8 Assembly accounted for the Governor's signature or his  
9 failing to act by deliberately referencing a law.

10 Other statutory clues also reinforce the requirement  
11 that the referendum is only on a law, and not a bill.  
12 Section 116.050 requires a petitioner in filling out his  
13 referendum petition to, quote, "Include all sections of  
14 existing law which would be repealed," end quote. A bill  
15 is not yet enacted law, so it cannot be repealed.

16 As the statutory text of Section 116.030 requires a  
17 law, the only way for my friend on the other side to win,  
18 is by showing that this statute, quote, "Interferes with  
19 or impedes," end quote, the right to a referendum. Again,  
20 No Bans on Choice. This he cannot do. One quick point,  
21 my friend said that the Governor can take 90 days to sign  
22 a bill and run out the referendum clock. That is  
23 incorrect. The Governor has only 45 days under Article 3,  
24 Section 31.

25 MR. HATFIELD: Judge, I accept that, apologies. I --  
118

1 I accept what he just said.

2 THE COURT: Okay. Thank you.

3 MR. SEIDLECK: And as -- as we've explained in our  
4 briefs, the Courts have recognized that the Governor's actions  
5 can shorten the window for starting a referendum.

6 Beginning with the right of a referendum under  
7 Section 3 -- under Article 3, Section 49, it says that  
8 with a couple of exceptions, the people reserves the power  
9 to approve or reject a referendum on any act of the  
10 General Assembly, as my friend pointed out. So  
11 essentially then this dispute boils down to whether an  
12 act, as used in Section 49, is a bill or a law. My friend  
13 on the other side suggests that it cannot be a law because  
14 Section 49 reserves, and I quote, "The power to reject  
15 laws by initiative," whereas the referendum language, as  
16 he pointed out, is to reject acts. But the initiative  
17 provides the people with the power to adopt legislation,  
18 while the referendum is the negative check on the General  
19 Assembly, the peoples' power to reject laws. So it would  
20 make little sense to allow for the rejection of only laws  
21 by the initiative petition, while allowing for the  
22 rejection of bills by the referendum.

23 However, even if plaintiffs are correct because the  
24 difference between an act and a law in Article 3, Section  
25 49 -- his -- his slide shows, is meaningful and still does

1 not mean as he suggests, that an act is a bill. He  
2 attempts to get to that conclusion, by suggesting that  
3 Article 3, Section 52(a)'s use of bill is synonymous with  
4 act in Section 49. But as the Missouri Supreme Court said  
5 in State ex rel. Upchurch v Blunt cited in our brief,  
6 quote, "Crucial words must be viewed in context," end  
7 quote. Section 42(a) provides two clues that the right to  
8 a referendum is limited only to enacted laws. First,  
9 Section 42(a)'s use of bill makes sense in context. Bill  
10 is used in the second sentence, when a referendum petition  
11 must be filed, quote, "90 days after final adjournment of  
12 the session of the General Assembly, which passed the bill  
13 on which the referendum is demanded," end quote. Bill is  
14 part of the restrictive clause, quote, "Which passed the  
15 bill on which the referendum is demanded," end quote,  
16 giving essential information about the timely  
17 requirements.

18 THE COURT: Excuse me.

19 MR. SEIDLECK: Yes, bless you.

20 It stands to reason that the Constitution would limit  
21 the time of submission with the General Assembly's part of  
22 its legislative action, that is passing the bill.

23 Second, the first sentence of Section 52(a), which my  
24 friend on the other side has ignored, establishes how a  
25 law can be referred to the people. A submitted petition



1 with significant signatures or a referral from the General  
2 Assembly. But notably it excerpts, and I quote, "Laws  
3 necessary for the immediate preservation of public health  
4 or safety, and laws making appropriations," end quote.  
5 The use of laws is meaningful here. It would make no  
6 sense to only exempt public emergency or appropriations  
7 laws from the referendum, but allow for a referendum to  
8 proceed on an emergency or appropriations bill, prior to  
9 that bill becoming law. Only permitting a referendum on a  
10 law itself, harmonizes Section 52(a) and Section 49.  
11 Plain text -- so as we've been going over, plain text  
12 answers the question here. But as -- as explained in our  
13 brief, precedent from prior -- from prior -- from prior  
14 cases interpreting both the current and prior  
15 constitutions also support us as well. My friend places a  
16 lot of emphasis on how a law only becomes effective 90  
17 days after the Governor's signature, but that ignores the  
18 fact that the bill has still become law. It is still  
19 susceptible to being repealed, either by the General  
20 Assembly or of course having a referendum against them.  
21 Finally, my friends' suggestions opposing that the  
22 Secretary's motion for judgment on the pleadings  
23 referenced the Secretary's discussion of the initiative  
24 petition process, the Secretary's motion brief was not  
25 mistaken in saying that the initiative petition process is

1 the proper vehicle for citizens to preempt enacted laws.  
2 Initiatives, not referenda, do indeed serve the purpose.  
3 I agree with my friend that the two processes are indeed  
4 not the same. And it would be absurd to conclude that both  
5 the initiative and referendum petitions can be used for  
6 the same functional purpose of affording unenacted bills.  
7 Referenda ultimately can be used against enacted laws;  
8 therefore, an act of the General Assembly means an enacted  
9 law, and the Secretary of State properly rejected  
10 plaintiffs' referendum petitions submitted before the  
11 enactment of House Bill 1.  
12 And then turning to Count 2, shifting to signatures.  
13 Plaintiffs' second claim fares no better on the merits. I  
14 will divide these preapproval signatures into the two  
15 groups that we have been discussing; the pre-enactment  
16 group and the post-enactment, but still preapproval --  
17 preapproved signatures -- preapproval signatures I meant.  
18 Beginning with the pre-enactment signatures, my friend  
19 on the other side argues that the plain language of  
20 Section 52(a) requires the referendum petition proponents  
21 have at least 90 days to gather signatures. He also  
22 suggests that this reading would harmonize the timing with  
23 the Governor's allotted time to act on a bill in Section  
24 31. He is wrong for three reasons: One, that is not what  
25 the plain language of Section 52(a) says. Section 52(a)

1 says, and I quote, "Referendum petitions shall be filed  
2 with the Secretary of State, not more than 90 days after  
3 the final adjournment," end quote. So my friend has not  
4 only -- excuse me. So my friend has not only flipped, and  
5 I quote, "Not more than 90 days," end quote, to "At least  
6 90 days," but he has also changed Section 52(a)'s language  
7 of "Be filed," to "Gather signatures."  
8 Second, plaintiffs' harmonization reading also falls  
9 flat. Besides having an allotted number of days in  
10 Section 31, the 90 days in Section 52(a), there is no  
11 rational -- there's no rationale to link these two  
12 provisions. Rather, the Western District in ACLU of  
13 Missouri v Ashcroft, harmonized Section 52(a)'s 90 day  
14 filing deadline with Article 3, Section 29, which prevents  
15 any law, except the emergency laws that had been noted  
16 previously from, quote, "Taking effect until 90 days after  
17 adjournment," end quote. As the Western District says,  
18 these time requirements are, and I quote, "consistent,"  
19 end quote, with one another. This harmonizes the  
20 constitutional provisions.  
21 Third the General assembly passed House Bill 1 on the  
22 last day of the legislative session. As the Missouri  
23 Supreme Court recognized in No Bans, quote, "Delaying the  
24 passage of legislation until the end of the legislative  
25 session," end quote, does not alter when a petition is

1 due. Plaintiffs aspirational interpretation of 52(a) must  
2 give way to the provisions actual plain meaning. In  
3 Upchurch versus Blunt, the Missouri Supreme Court held  
4 that even though Section 50 -- Section 52(a)'s  
5 correspondence, which is Section 52(a)'s corresponding  
6 initiative petition provision, did not have an explicit  
7 time requirement when an initiative could be filed. It  
8 was clear that the time period was, quote, "Framed by,"  
9 end quote, its reference to general elections. As the  
10 Supreme Court said, quote, "Although the authority is not  
11 semantically explicit, the constitutional provision is  
12 nonetheless, plain in meaning," end quote. The same  
13 analysis governed Section 52(a). It too only has an  
14 explicit requirement for when petitions must be filed.  
15 And like Section 50, Section 52(a)'s front and timing is  
16 framed by reference to laws; therefore, petitioners are  
17 only allowed to submit sample sheets after the enactment.  
18 That is 90 days after filing the adjournment.  
19 Turning to the other preapproval signatures, these  
20 two are invalid. My friend on the other side relies  
21 almost exclusively on No Bans on Choice, but in that case  
22 the Missouri Supreme Court held that the statutory  
23 prohibition on collecting referendum petition signatures  
24 prior to the Secretary's certification of the official  
25 ballot title was unconstitutional, but here the

1 certification of the ballot title is not at issue. What  
2 is at issue is the Secretary's approval as to form.  
3 Section 116.332 provides the filing and signature  
4 requirements for a referendum petition. It states that  
5 before a referendum petition may be circulated for  
6 signatures, quote, "The sample sheet must be submitted to  
7 the Secretary of State," end quote. Logic dictates that  
8 this means that petitioners must have a valid sample sheet  
9 on which to collect signatures. The Western District in  
10 ACLU of Missouri versus Ashcroft has called this time --  
11 this period of time when Secretary is reviewing as to form  
12 under Section 116.332, the, and I quote, "fee  
13 pre-signature collection stage," end quote. This makes  
14 sense because unlike ballot title certification, the  
15 Secretary's approval of the referendum petition occurs at  
16 the beginning of the process. As the Missouri Supreme  
17 Court recognized in Coleman versus Ashcroft, this review  
18 is important for correcting any errors at the beginning of  
19 the process. This early review allows for, and I quote,  
20 "Correction with minimal disruption to the citizens'  
21 constitutional power," end quote.  
22 Finally, and I quote the Moore case, quote, "The fact  
23 that the government did not approve the bill until after  
24 the beginning of the recess, does not arrest," end quote,  
25 the constitutional deadline for submitting a referendum

1 petitions. The Secretary's approval as to form provides a  
2 clear line of demarcation, a holding to the contrary could  
3 sow confusion on behalf of Missourians seeking to sign or  
4 even sign this referendum petition. For example, as we've  
5 been discussing today, a voter may sign an invalid  
6 referendum petition such as any of the first three  
7 petitions submitted by this plaintiff -- by the plaintiffs  
8 here, but when the later -- but then when later approached  
9 with a valid petition, she may -- she may not sign it,  
10 believing that she already had signed the petition. Her  
11 signature would therefore go uncounted; or alternatively,  
12 a voter believing that the petition he had signed to be  
13 invalid, could later sign a second valid petition,  
14 potentially exposing himself to liability; but also  
15 potentially undermining petitioners' efforts to get their  
16 measure on the ballot, due to not being able to rely on  
17 duplicated signatures.

18 Therefore, this Court should rule that the Secretary  
19 cannot count any signatures collected before his approval.

20 Finally, plaintiffs are not entitled to a mandatory  
21 injunction. A key part of Missouri's Constitution is the  
22 ability of the citizens to hold the General Assembly  
23 accountable through the referendum process.

24 Constitutional and statutory rules, none of which  
25 plaintiffs challenge here, preserve the integrity of this



1 process, ensuring that only those issues the people of  
2 Missouri passionately care about, fairly make the ballot.  
3 Allowing partisan's special interest organizations to flat  
4 these rules and rewrite what it means to hold a  
5 referendum, defiles Missouri's referendum -- referendum  
6 process.

7 As Justice Barrett in the last spring Trump v CASA  
8 case regarding that nationwide injunctions, quote, "In  
9 equity, the broader and deeper the remedy the plaintiff  
10 wants, the stronger the plaintiff's story needs to be,"  
11 end quote. Plaintiffs have told no such story here. They  
12 are wrong on the law and as explained in our brief and in  
13 the first joint stipulation with the plaintiffs,  
14 plaintiffs had not shown that they will be incapable of  
15 meeting the necessary signature thresholds with the  
16 signatures at issue here; yet, it's plaintiffs' burden to  
17 establish irreparable harm and it can't just be assumed  
18 and the state can't be made to disprove it. In short,

19 plaintiffs haven't proven irreparable harm entitling them  
20 to an injunction, mandating that the state accept  
21 signatures gathered prior to the petition's approval as to  
22 form.

23 Unless the Court has any questions, the state thanks  
24 them.

25 THE COURT: I don't have any questions.

1 Mr. Ellinger.

2 (Argument on behalf of intervenor.)

3 MR. ELLINGER: Thank you, Judge. I think the state  
4 did a very admirable job of going through all the law in this.

5 I might try to take it up from a slightly different angle.

6 Not too long ago when we were in Court, I seem to  
7 remember somebody talking about Air Bud the movie. Maybe  
8 not a movie I've ever seen, so I can't really speak  
9 intelligently about it, but I think maybe this case is a  
10 little bit more like -- oh maybe Pulp Fiction. So anybody  
11 who has seen Pulp Fiction knows that you start watching  
12 the movie and you realize you're not actually at the  
13 beginning of the movie, you're somewhere later in the  
14 movie; but then later in the movie, you are somewhere back  
15 at the beginning of the movie. It makes for great  
16 entertainment, but it really doesn't make for a very good  
17 process as a matter of law and governmental effectiveness.  
18 There is a statutory process, so let's not jump to the

19 end, which is where the plaintiffs want to be in this  
20 case. Let's start from the beginning where process is.

21 So you submit a form to the Secretary of State's office.

22 The Secretary of State in conjunction with the Attorney  
23 General approved that as to form.

24 There were four petitions in this case; three of  
25 those were not approved as to form, one of those was.

1 Then you circulate your petitions for signatures. I don't  
2 think there's any dispute based on everything that the  
3 plaintiffs have said. And for purposes of argument, we'll  
4 assume that it's true that they have circulated petitions,  
5 and they have obtained signatures. That's -- that's their  
6 position. After you circulate petitions and you get those  
7 signature, you turn them in to the Secretary of State's  
8 office, and then the Secretary of State's office goes  
9 through a verification process; and then at the end of  
10 that process, that's when a decision gets made.  
11 If I can approach, Judge, I'm going to hand you just  
12 a copy of Section 116.120. This is what occurs after the  
13 petition has been submitted and after the signatures are  
14 verified. When an issue of referendum petition is  
15 presented to the Secretary of State, he shall examine the  
16 petition to determine whether it complies with the  
17 Constitution of Missouri and with this chapter. And then  
18 it talks about the -- the signature process. We don't  
19 have a determination on sufficiency. We don't have a  
20 determination of insufficiency. We are at the beginning  
21 of the movie, but the answer that's being asked for is at  
22 the end of the movie. Well, we haven't gotten to the end  
23 of the movie. There's a lot of steps along the way before  
24 the end of the movie. As counsel for the state pointed  
25 out, they might not get the signatures. They just might

1 not have enough signatures. They might have problems with  
2 affidavits; they might have other issues; they might have  
3 a provisional -- a measure that doesn't comply with the  
4 Constitution. Those are decisions that are made at a  
5 later date, and not today.

6 What the plaintiffs are asking you to do is to jump  
7 forward. Instead of waiting to make that decision at the  
8 end, they're asking you to make that decision today. They  
9 have a process because if they don't like the sufficiency  
10 determination of the Secretary of State, guess what they  
11 get to do. They get to express judicial review. It's  
12 expressed in Section 116.200 that they get judicial  
13 review. Not only is it a judicial review, it's expedited  
14 judicial review.

15 So why are we here in December, when we don't even  
16 have the knowledge as to whether they have enough  
17 signatures or not? You certainly heard no testimony they  
18 have enough signatures. Ironically -- you know, the other  
19 thing you didn't hear any testimony about is any harm  
20 whatsoever to them from the actions that occurred. They  
21 have purported in their pleadings to say that they are  
22 collecting signatures and that they're going to turn them  
23 in tomorrow or the next day or the day after that,  
24 depending on what day they choose to do so. Where's the  
25 harm? If they got -- if they got signatures, then they

1 make the ballot. If they don't the signatures, they don't  
2 make the ballot.  
3 They are seeking an injunction to compel the  
4 Secretary of State to take an action that is not yet even  
5 potentially in front of them. You know, they could have  
6 shown harm. They could have waited maybe. They could  
7 have waited until the -- until October 14<sup>th</sup> when the 004  
8 was approved; and then at that point, they could have  
9 moved forward, then they could have alleged that there was  
10 some harm if they didn't make it. But they didn't do that  
11 like any -- any good person would do. They hark into the  
12 words of Admiral Farragut and said, "Damn the torpedoes  
13 straight ahead," and they plowed forward.  
14 Now what they're trying to do is they're trying to  
15 get an answer on signatures as to their validity. Let's  
16 not be fooled, that's the only thing they're really asking  
17 for is validity of signatures. They're trying to get an  
18 answer on validity of signatures before the statutory  
19 process is completed. And that by definition is an Offi  
20 advisory opinion, and one that this Court should not take.  
21 If what they're saying is the Secretary's actions under  
22 116.120 are inappropriate or wrong, well, they can file an  
23 action to determine that 116.120 is unconstitutional.  
24 They've expressly said they're not seeking the  
25 unconstitutionality of any statute. They could -- which

1 I'm actually quite surprised they didn't ask for -- they  
2 could simply ask for the Secretary to, as I think the  
3 testimony said, separate the signatures that might be in  
4 question and just ask the Court to order the Secretary to  
5 process those, but keep them separate. Then at the end of  
6 the game, guess what. We can make a decision. They might  
7 have enough signatures without it, they might not, they  
8 might need those signatures, and then this issue would be  
9 ripe. We're not at any of these points yet.

10 The other thing we don't know is which version  
11 they're circulating. Is it 003 or 004 or is it 001 or is  
12 it 002? Those are issues that we can adjudicate at a  
13 later time and date, but not today.

14 In -- in turning to -- I think the one issue on the  
15 merits that I wanted to quickly address here is the issue  
16 of the Governor's signature. This is a really important  
17 issue, and one that I think -- you know, it is one that  
18 ought to be determined at a later date when we have more  
19 facts to back up the other issues; but with respect to a  
20 matter of law, there are two operative constitutional  
21 provisions. There's Article 3, Section 49, which I  
22 believe they've already provided you in your packet, but  
23 I'm happy to give you a stand alone copy if you'd like,  
24 Judge. Do you want more paper?

25 THE COURT: No, thank you.



1 MR. ELLINGER: But I will give you a copy of Article  
2 3, Section 52(a). Article 3, Section 52(a) kind of reinforces  
3 the point that you have to have a law to go to a referendum.  
4 And -- and I think the way you see that is because you read the  
5 language of these two provisions together. One is the power to  
6 do a referendum, one is the exceptions to referendums. And --  
7 and it brings to light why the Secretary's role in potentially  
8 rejecting forms of petitions and sufficiency determinations is  
9 so important. And I'm going to focus on the sufficiency  
10 determination because I think that's what's really important  
11 here for this; and that is that, imagine if this referendum  
12 wasn't on a redistricting bill, it was on an appropriation for  
13 public education. That's an exclusion -- that's an express  
14 exclusion under Article 3, Section 52(a). That referendum is  
15 dead from the second it's filed. Now under the plaintiff's  
16 theory, if you applied it to this case, not only would the  
17 Secretary of State have to approve that as to form, but he  
18 would have to count those signatures on a dead petition that  
19 was -- it was dead at birth; void ab initio. But what if there  
20 was an emergency clause on this? Same thing, can't do it, it's  
21 barred. Now if they want to spend their money and go collect  
22 signatures and then throw them all away, they're most welcome  
23 to do that, but you can't do that. It's because you're talking  
24 about laws, and until the Governor signs the bill, there is no  
25 law.

1 They reference the term act. And you know, I thought  
2 act is such an interesting word, Judge, because it's the  
3 doing of a thing. It's real simple. It's just a doing of  
4 a thing. There's a lot of definitions, but it's the doing  
5 of a thing. So they -- they have this nice pretty picture  
6 in their PowerPoint. I love getting to use their  
7 PowerPoint. And if you look at it, it says, "An act,"  
8 this is the introduced version of a bill.

9 MR. HATFIELD: No it's not.

10 MR. ELLINGER: When a bill is introduced, it says,  
11 "An act."

12 MR. HATFIELD: Oh okay. Fair enough.

13 MR. ELLINGER: An introduced version of a bill says,  
14 "An act," but it's not an act. It's a nothing, it's a bill,  
15 it's a proposal; yet, based upon their argument that because  
16 this bill says "An act," on the top of the first page, that  
17 that makes it something that can be subject to a referendum.  
18 It simply can't be the case. We talked about it the last time  
19 we were here, Judge. You can't really get a referendum on a  
20 bill -- you can't really get a referendum on a bill that's  
21 passed one house and not the other. You can only get a  
22 referendum on law, and a law requires a Governor's signature.  
23 And if you're circulating petitions, prior to having a  
24 Governor's signature, you're doing something that's void ab  
25 initio. You're trying to get a referendum, not on a law.

1 You're trying to get a referendum on a bill. There's no  
2 authority in the Constitution to do that.  
3 Finally, Judge, I will point out that there was some  
4 discussion about the ACLU case. The legislature, after  
5 the ACLU case, went and amended statutes. I think my  
6 opposing counsel has recently argued to say that the bill  
7 that did that was unconstitutional, but there -- there is  
8 a -- there is an amendment of Bill 22 that basically said  
9 if the ballot titles change, don't lose any signatures  
10 because that is what the Court was talking about was  
11 signatures on -- they were with an official ballot title.  
12 They weren't talking about form and they weren't talking  
13 about the constitutionality of -- of the action.  
14 And then finally, Judge, and I'm just going to  
15 reinstate -- restate what I said a moment ago. To get an  
16 injunction -- now we have to prevail in the merits, which  
17 I think they failed that. But to get an injunction, you  
18 have to show actual harm, and I have yet to hear any  
19 actual harm. So they're asking for an advisory opinion.  
20 They're asking to put the cart before the horse. They're  
21 wrong on the facts, and they're wrong on the law. The net  
22 effect is -- and I would restate the facts that we have  
23 motions to dismiss on this, and I would urge you to rule  
24 on those or rule on the merits and deny all of their  
25 relief.

1 Thank you. And I can answer any questions, Judge.

2 THE COURT: I don't have any. Thank you.

3 Okay. The case has been submitted to the Court. The  
4 Court will take this matter under advisement. The Court  
5 will also leave the motion for sanctions under advisement.

6 Is there anything else we need to put on the --  
7 actually, let's just go off-the-record for one moment.  
8 (Brief conversation held and adjourned off-the-record.)

9  
10

11  
12

13  
14

15  
16  
17

18  
19

20  
21  
22

23

24

25

REPORTER'S CERTIFICATE

I, Candice Perez, Certified Court Reporter, hereby  
certify that I am the official court reporter for Division  
4 of the Cole County Circuit Court, that on the 8th of  
December 2025, I was present and reported all of the  
proceedings in PEOPLE NOT POLITICIANS v DENNY HOSKINS. I  
further certify that the foregoing \*137 pages contain a  
true and accurate reproduction of the ordered portions of  
the proceedings transcribed.

Transcript completed by: December 09, 2025

/s/ Candice Perez  
Candice Perez, C.C.R.  
Official Court Reporter, Div. 4

Court Document Not an Official Court Document Not an Official Court Document Not an O  
Official Court Document Not an Official Court Document Not an Official Court Document  
Not an Official Court Document Not an Official Court Document Not an Official Court Do  
Document Not an Official Court Document Not an Official Court Document Not an Official  
al Court Document Not an Official Court Document Not an Official Court Document Not an  
an Official Court Document Not an Official Court Document Not an Official Court Document  
nt Not an Official Court Document Not an Official Court Document Not an Official Court D  
t Document Not an Official Court Document Not an Official Court Document Not an Official  
cial Court Document Not an Official Court Document Not an Official Court Document Not  
ot an Official Court Document Not an Official Court Document Not an Official Court Docum  
ent Not an Official Court Document Not an Official Court Document Not an Official Court  
ut Document Not an Official Court Document Not an Official Court Document Not an Offic  
ficial Court Document Not an Official Court Document Not an Official Court Document Not  
ot an Official Court Document Not an Official Court Document Not an Official Court Docum  
ment Not an Official Court Document Not an Official Court Document Not an Official Cou  
urt Document Not an Official Court Document Not an Official Court Document Not an Offi  
Official Court Document Not an Official Court Document Not an Official Court Document N  
Not an Official Court Document Not an Official Court Document Not an Official Court Docu

# WRIT EXHIBIT 21



IN THE CIRCUIT COURT OF COLE COUNTY

STATE OF MISSOURI

PEOPLE NOT POLITICIANS, et al.,

Plaintiffs,

vs.

MISSOURI SECRETARY OF STATE  
DENNY HOSKINS,

Defendant.

Case No: 25AC-CCo7128

**PROPOSED [FINAL JUDGMENT]**

All parties appeared before this Court on December 8, 2025, for a bench trial. Plaintiffs People Not Politicians and Richard von Glahn were represented by Chuck Hatfield and Greta Bax of Stinson LLP. Defendant Missouri Secretary of State Denny Hoskins was represented by Principal Deputy Solicitor General Bill Seidleck of the Missouri Attorney General's Office and Jacqueline Bryant of the Secretary of State's Office. Intervenor Put Missouri First was represented by Marc Ellinger and Stephanie Bell of Ellinger Bell LLC.

Plaintiffs presented two sets of joint stipulations of facts and exhibits, which were accepted into the record. The amended joint stipulation, filed with this Court on December 3, 2025, was agreed upon by all parties and was entered into the record with no objections. The initial joint stipulation, filed with this Court on October 28, 2025, was agreed to by Plaintiffs and Defendant. Intervenor objected to the entry of this stipulation into the record, but the Court hereby overrules that objection.

Intervenor also offered two exhibits, Intervenor's Exhibit A, a certificate of sufficiency issued by the Secretary of State for an initiative petition and Intervenor's Exhibit B, a certificate of insufficiency issued by the Secretary of State for an initiative petition. Neither of Intervenor's exhibits were documents issued regarding the referendum petition for House Bill 1. No party objected to the admission of Intervenor's exhibits. Intervenor called Chrissy Peters, Director of Elections for the Secretary of State's Office to testify.

Having considered the parties' pleadings, arguments, evidence, and the law, the Court finds that the Secretary of State's decision to reject the form of Plaintiffs' referendum petition sample sheet submitted on September 15, 2025 (identified by the Secretary of State's Office as 2026-RO03), was unlawful and that approval of the form of a referendum petition sample sheet is not necessary before a proponent of a referendum may start gathering signatures. Therefore, the Court issues its FINAL JUDGMENT for Plaintiffs and against Defendant and Intervenor.

Plaintiffs' First Amended Petition poses two questions for this Court to decide. First, was the Secretary of State's decision to reject the form of Plaintiffs' referendum petition submitted on September 15, 2025, lawful and second, is a referendum proponent required to wait to gather signatures until the Secretary has approved the form of the referendum sample sheet. The answer to both questions is no.

The Secretary rejected the form of the referendum sample sheet because the sample sheet was submitted prior to the Governor signing House Bill 1. Even if the Secretary is correct that a governor must sign a bill before a referendum sample sheet may be submitted (the Court need not decide that issue), whether the Governor signed House Bill 1 is not a matter of form. “[T]he secretary of state’s authority to review a referendum petition sample sheet for sufficiency as to form is limited to determining whether the sample sheet is substantially in the form required by 116.030[.]” *ACLU v. Ashcroft*, 577 S.W.3d 881, 892 (Mo. App. 2019).

“Neither the Secretary of State nor the Attorney General had the statutory authority. . .to reject the Sample Sheet on constitutional grounds and because no issue with the sufficiency has to form of the Sample Sheet has been identified, the Secretary of State was obligated . . . to approve the Sample Sheet.” *Id.* Yet the witness from the Secretary of States’ office testified in essence that the Secretary did exactly what the Court of Appeals says he cannot do. The form of Plaintiffs’ referendum sample sheet submitted on September 15, 2025, complies with all requirements in Section 116.030, RSMo. Therefore, the Secretary unlawfully rejected the form of the referendum sample sheet. The Court finds for Plaintiffs on Count I.

The Secretary also argued that Plaintiffs must have waited to gather signatures until the Secretary issued an approval as to form of the referendum petition sample sheet. That’s not what the statute says. Section 116.332 states:

“Before a...referendum petition may be circulated for signatures, a sample sheet must be submitted to the secretary of state in the form in which it will be circulated.” § 116.332.1, RSMo. Plaintiffs fulfilled this notice requirement by submitting referendum petition sample sheets to the Secretary of State.

The plain language of the statute only requires submission of a sample sheet before a petition is circulated. Therefore, the Secretary’s declared policy that he will not count signatures gathered prior to the date of the approval as to form of the referendum sample sheet is unlawful and contrary to Section 116.332.1, RSMo. The Court finds for Plaintiffs on Count II.

FINAL JUDGMENT is entered in favor of Plaintiffs on all Counts and against Defendant and Intervenor on all Counts. All other pending matters, motions, claims, or requests for relief not expressly granted herein are DENIED. It is therefore ORDERED, ADJUDGED, and DECREED that:

1. Plaintiffs’ referendum petition sample sheet submitted on September 15, 2025, is approved as to form as of that date because it substantially complied with the requirements of Section 116.030, RSMo;
2. Signatures may be gathered on a referendum petition once a sample sheet is submitted to the Secretary of State;
3. Signatures gathered on a referendum petition may not be rejected for the sole reason that they were gathered prior to the Secretary issuing an approval as to form of the referendum petition sample sheet;

4. The Secretary of State and anyone acting in concert with him are enjoined from rejecting Plaintiffs' referendum petition sample sheets on the basis that the Governor had not signed House Bill 1 at the time of submission of the sample sheets; and
5. The Secretary of State and anyone acting in concert with him are enjoined from rejecting any signatures gathered by Plaintiffs for the sole reason that the signatures were gathered on a date prior to the approval of the referendum petition sample sheet as to form.
6. Nothing in this Judgment precludes the Secretary of State from reviewing and invalidating signatures that are invalid for reasons other than being dated prior to approval of the form of the referendum petition sample sheet and nothing herein shall be construed as an order requiring the Secretary to certify the underlying referendum for the ballot.

So ordered, adjudged, and decreed this \_\_\_\_\_ day of \_\_\_\_\_, 2025

\_\_\_\_\_  
The Honorable Christopher K. Limbaugh

Court Document Not an Official Court Document Not an Official Court Document Not an O  
Official Court Document Not an Official Court Document Not an Official Court Document  
Not an Official Court Document Not an Official Court Document Not an Official Court Do  
Document Not an Official Court Document Not an Official Court Document Not an Official  
al Court Document Not an Official Court Document Not an Official Court Document Not an  
an Official Court Document Not an Official Court Document Not an Official Court Document  
Not an Official Court Document Not an Official Court Document Not an Official Court D  
Document Not an Official Court Document Not an Official Court Document Not an Official  
ial Court Document Not an Official Court Document Not an Official Court Document Not  
an Official Court Document Not an Official Court Document Not an Official Court Documen  
ment Not an Official Court Document Not an Official Court Document Not an Official Court  
Document Not an Official Court Document Not an Official Court Document Not an Official  
Court Document Not an Official Court Document Not an Official Court Document Not  
Official Court Document Not an Official Court Document Not an Official Court Document N  
Not an Official Court Document Not an Official Court Document Not an Official Court Docu

# WRIT EXHIBIT 22



**IN THE CIRCUIT COURT OF COLE COUNTY  
19TH JUDICIAL CIRCUIT  
STATE OF MISSOURI**

PEOPLE NOT POLITICIANS, *et al.*,

Plaintiffs,

Case No. 25AC-CC07128

MISSOURI SECRETARY OF STATE  
DENNY HOSKINS,

Defendant.

**STATE DEFENDANT'S PROPOSED ORDER AND JUDGMENT**

This matter came before the Court on a bench trial on December 8, 2025. Having been duly advised of the premises, this Court finds and concludes as follows:<sup>1</sup>

**FINDINGS OF FACT**

**I. Procedural Background**

1. Plaintiffs People Not Politicians and Richard von Glahn initiated this action on September 18, 2025, by way of Petition for Declaratory Judgment and Injunctive Relief against Defendant Missouri Secretary of State.

---

<sup>1</sup> To the extent a finding of fact is more properly characterized as a conclusion of law, it is adopted and incorporated as such by reference. To the extent a conclusion of law is more properly characterized as a finding of fact, it is adopted and incorporated as such by reference.

2. On September 29, Plaintiffs filed the operative Amended Petition for Declaratory and Injunctive Relief against the State Defendant.

3. The parties entered into joint stipulations and a bench trial was scheduled for November 3. However, the November 3 trial was continued at no fault of either party. The bench trial was rescheduled for November 13.

4. On November 12, Intervenor Put Missouri First moved to intervene.

5. On November 13, the Court granted Intervenor's motion over Plaintiffs' objection. The Court denied Intervenor's motion to continue the case to allow for receipt of discovery. The Intervenor then presented the Court with an application for change of judge, which the Court granted. The trial was continued, and a new judge assigned.

6. All parties (including Intervenor) entered into an amended joint stipulation of facts on December 3.

7. On December 4, the Court heard motions in this case. The Court denied Plaintiffs' motions to reconsider intervention and to strike. On reciprocal motions, the Court denied Plaintiffs' motion for protective order and granted Intervenor's motion to compel pursuant to a protective order. The Court took the State Defendant's and Intervenor's motions to dismiss under advisement.

8. The Court held a bench trial on December 8.

9. The Court orally ordered the parties to file proposed orders and judgments to the Court by December 10 at 5:00, p.m.

## II. Factual Determinations

### A. Stipulated Facts

10. People Not Politicians is a campaign committee organized in the State of Missouri.

11. Richard von Glahn is a Missouri citizen, resident of St. Louis County, a taxpayer, and qualified voter in the State of Missouri.

12. Richard von Glahn is the proponent of the referendum petitions 2026-R001; 2026-R002; 2026-R003; and 2026-R004.

13. Denny Hoskins is the Missouri Secretary of State.

14. Exhibit 1 is a true and correct copy of Make Your Voice Heard: Missouri's Initiative Petition Process, published by the Missouri Secretary of State.

15. On September 12, 2025, the Missouri General Assembly "truly agreed and finally passed" House Bill 1.

16. Exhibit 2 is a true and correct copy of House Bill 1 (2025).

17. Exhibit 3 is a true and correct copy of the Journal of the Senate from Friday, September 12, 2025.

18. Richard von Glahn submitted two referendum petition sample sheets (2026-R001 and 2026-R002) to the Secretary of State's Office on September 12, 2025.

19. Exhibit 4 is a true and correct copy of the referendum petition sample sheet 2026-R001.

20. Exhibit 5 is a true and correct copy of referendum petition sample sheet 2026-R002.

21. On September 12, 2025, the Secretary of State's Office sent a letter to Richard von Glahn regarding said sample sheets (2026-R001 and 2026-R002).

22. Exhibit 6 is a true and correct copy of the September 12, 2025 letter sent from the Secretary of State's Office to Richard von Glahn.

23. On September 14, 2025, the Secretary of State sent another letter to Richard von Glahn regarding the referendum petition sample sheets (2026-R001 and 2026-R002).

24. Exhibit 7 is a true and correct copy of the September 14, 2025 letter sent from the Secretary of State's Office to Richard von Glahn.

25. Richard von Glahn submitted a third referendum petition sample sheet (2026-R003) to the Secretary of State's Office on September 15, 2025.

26. Exhibit 8 is a true and correct copy of referendum petition sample sheet 2026-R003.

27. On September 15, 2025, the Secretary of State's Office sent a letter to Richard von Glahn regarding the referendum petition sample sheet (2026-R003).

28. Exhibit 9 is a true and correct copy of the September 15, 2025 letter sent from the Secretary of State's Office to Richard von Glahn.

29. Richard von Glahn's counsel sent a letter to the Secretary of State and the Attorney General dated September 15, 2025.

30. Exhibit 10 is a true and correct copy of the letter dated September 15, 2025 sent from Charles Hatfield to the Secretary of State and the Attorney General.

31. On September 26, 2025, the Secretary of State rejected Richard von Glahn's referendum petition sample sheets (2026-R001, 2026-R002, and 2026-R003) as to form.

32. Exhibit 11 are true and correct copies of the September 26, 2025 letters rejecting Richard von Glahn's referendum petition sample sheets as to form.

33. Governor Mike Kehoe signed House Bill 1 (2025) on September 28, 2025.

34. On September 29, 2025, Richard von Glahn submitted a fourth referendum petition sample sheet (2026-R004) to the Secretary of State's Office.

35. Exhibit 12 is a true and correct copy of referendum petition sample sheet 2026-R004.

36. On October 14, 2025, the Secretary of State approved the fourth referendum petition sample sheet as to form (2026-R004).

37. Exhibit 13 is a true and correct copy of the October 14, 2025 letter approving the referendum petition sample sheet as to form.

38. The Secretary of State stated in an October 15, 2025 press release that “[u]nder Missouri law, no signatures gathered before this approval date are valid.”

39. Exhibit 14 is a true and correct copy of the October 15, 2025 press release from the Secretary of State regarding referendum petition sample sheet 2026-R004.

40. Exhibit 15 is a true and correct copy of the October 16, 2025 press release from the Secretary of State regarding referendum petitions.

41. Referendum petitions on House Bill 1 have been circulated for signatures.

42. As of the time of trial, no signed referendum petitions have been submitted to the Secretary of State regarding House Bill 1.<sup>2</sup>

## **B. Non-Stipulated Factual Findings**

43. Between September 15, 2025 and September 28, 2025, Plaintiffs collected approximately 32,600 signatures in support of the referendum petition. See Ex. 17, ¶ 29.

---

<sup>2</sup> Plaintiffs submitted their referendum petition to the Secretary of State on December 9, 2025.



44. Between September 29, 2025 and October 14, 2025, Plaintiffs collected approximately 70,200 signatures in support of the referendum petition. *See id.* ¶ 32.

45. In their operative First Amended Petition, Plaintiffs did not allege specific facts speaking to irreparable harm faced by any Plaintiff absent injunctive relief. First Am. Pet. ¶¶ 32–62.

46. Plaintiffs likewise submitted no evidence and offered no testimony at trial respecting irreparable harm absent an injunction. *See* Trial Tr. 18:1–23:18.

47. Plaintiffs publically claim to have collected over 300,000 signatures. *See Missouri Congressional Maps on Hold*, Mo. Voter Prot. Coal., <https://mailchi.mp/movpc/mo-congressional-maps-on-hold?e=d63e233fc0>.<sup>3</sup>

48. All factual findings and credibility determinations not expressly made herein are found in accordance with the Court’s ruling. *See Prosecuting Attorney, 21st Judicial Circuit ex rel. Williams v. State*, 696 S.W.3d 853, 862–63 (Mo. banc), *cert. denied*, 145 S. Ct. 114 (2024).

---

<sup>3</sup> The Court has no reason to doubt Plaintiffs’ own public representations and therefore can take judicial notice of the amount of signatures that Plaintiffs claim to have collected. *See Whitmoor Realty, LLC v. Beckerle*, 588 S.W.3d 573, 579 (Mo. App. E.D. 2019) (recognizing that courts may notice information from a “credible source”).

## CONCLUSIONS OF LAW

### I. Legal Standards

49. Plaintiffs bear the burden of proving, by a preponderance of the evidence, that they are entitled to the injunctive and declaratory relief sought for their statutory challenges.

50. Jurisdiction requires “[t]he existence of an actual and vital controversy susceptible of some relief,” *L.E.C. v. K.R.C.*, 674 S.W.3d 97, 103 (Mo. App. E.D. 2023) (quoting *State ex rel. Reed v. Reardon*, 41 S.W.3d 470, 473 (Mo. banc 2011)), as “[i]t is well-established that Missouri courts do not determine moot cases or render advisory opinions,” *Friends of the San Luis, Inc. v. Archdiocese of St. Louis*, 312 S.W.3d 476, 483 (Mo. App. E.D. 2010). “A case is moot when an event occurs that makes the court’s decision unnecessary or makes granting effectual relief by the court impossible.” *Id.* “Even a case vital at inception . . . may be mooted by an intervening event which so alters the position of the parties that any judgment rendered merely becomes a hypothetical opinion.” *Id.* (quoting *City of Manchester v. Ryan*, 180 S.W.3d 19, 21 (Mo. App. E.D. 2005)).

51. “Ripeness requires the declaration sought to present a question appropriate and ready for judicial determination.” *Parker v. Castle View Country Club, Inc.*, 690 S.W.3d 918, 920 (Mo. App. S.D. 2024) (quoting *Cooper v. State*, 818 S.W.2d 653, 655 (Mo. App. W.D. 1991)). This requires that “the

judgment will declare a fixed right and accomplish a useful purpose.” *Local Union 1287 v. Kansas City Transp. Auth.*, 848 S.W.2d 462, 463 (Mo. banc 1993). “It is premature to render a judgment or opinion on a situation that may never occur.” *Id.*

52. “The primary goal of statutory interpretation is to give effect to legislative intent, which is most clearly evinced by the text of the statute.” *State ex rel. Bailey v. Fulton*, 659 S.W.3d 909, 912 (Mo. banc 2023) (citation omitted). “Words and phrases shall be taken in their plain or ordinary and usual sense, but technical words and phrases having a peculiar and appropriate meaning in law shall be understood according to their practical import.” § 1.090, RSMo; *see also Gross v. Parson*, 624 S.W.3d 877, 884 (Mo. banc 2021) (“Accordingly, ‘[a] word not defined in a statute is given its ordinary meaning pursuant to the dictionary.’” (alteration in original)). Statutory interpretations that render portions of a statute superfluous are disfavored. *See State ex rel. Goldsworthy v. Kanatzar*, 543 S.W.3d 582, 586 (Mo. banc 2018).

53. Entitlement to an injunction requires Plaintiffs to show that they succeed on “the merits of [their] claims” and that “weigh[ing] the harm[s]” favors the Plaintiffs in the absence of relief. *Est. of Hutchison v. Massood*, 494 S.W.3d 595, 608 (Mo. App. W.D. 2016) (quoting *State ex rel. Koster v. Didion Land Project Ass’n*, 469 S.W.3d 914, 918 (Mo. App. E.D. 2015)). Plaintiffs must also demonstrate: “1) no adequate remedy at law; and 2) irreparable harm will

result if the injunction is not awarded.” *Suppes v. Curators of Univ. of Mo.*, 613 S.W.3d 836, 847 (Mo. App. W.D. 2020) (citation omitted). “A permanent injunction should be granted sparingly in clear cases only, and the decree should be framed to afford relief to which complainant is entitled and not to interfere with legitimate and proper action by those against whom it is directed.” *Metmor Fin., Inc. v. Landoll Corp.*, 976 S.W.2d 454, 463 (Mo. App. W.D. 1998).

54. The Court may grant declaratory relief only when:

(1) a justiciable controversy that presents a real, substantial, presently-existing controversy admitting of specific relief, as distinguished from an advisory decree upon a purely hypothetical situation; (2) a plaintiff with a legally protectable interest at stake, “consisting of a pecuniary or personal interest directly at issue and subject to immediate or prospective consequential relief;” (3) a controversy ripe for judicial determination; and (4) an inadequate remedy at law.

*Mo. Soybean Ass’n v. Mo. Clean Water Comm’n*, 102 S.W.3d 10, 25 (Mo. banc 2003) (internal quotation omitted). “When seeking declaratory relief, a legally protectable interest exists if the plaintiff is directly and adversely affected by the action in question. The party seeking relief has the burden of establishing that they have standing.” *World Wide Tech., Inc. v. Off. of Admin.*, 572 S.W.3d 512, 519 (Mo. App. W.D. 2019).

## II. Threshold Matters

55. Before the Court can address the merits of Plaintiffs' claims, it must consider justiciability questions for both claims. *First*, it must determine whether Plaintiffs' Count I is moot. *Second*, it must decide if Count II is ripe for judicial review. The Court sides with the State on all both issues and holds that this matter is non-justiciable.

### A. Count I Is Moot

56. The State's first threshold argument is Count I of Plaintiffs' First Amended Petition—seeking a mandatory injunction requiring the Secretary to accept Plaintiffs' referendum petition as to form—is now moot.

57. On October 14, 2025, the Secretary of State approved as to form Plaintiffs' referendum petition on House Bill 1. *See* Ex. 16, ¶ 27. Other than the date of submission listed on the cover page, which is not part of the referendum petition, *see* §§ 116.030, 116.332, RSMo, the referendum-petition sample sheets submitted before the Governor signed House Bill 1 and the one approved as to form on October 14, 2025 are identical. *Compare* Ex. 4; Ex. 5; Ex. 8, *with* Ex. 12. Plaintiffs ask this Court to declare their sample sheets valid as to form and to enjoin the Secretary from rejecting their sample sheets. *See* First Am. Pet. ¶¶ 73–76. But given intervening action by the Secretary, those requests are now “plainly moot.” *Alaska v. U.S. Dep’t of Agric.*, 17 F.4th 1224, 1226 (D.C. Cir. 2021) (citation omitted). The Secretary's approval of their most



recently submitted referendum petition has given Plaintiffs what they wanted. This Court can offer no more “effectual relief”—any decision would be “unnecessary.” *L.E.C.*, 674 S.W.3d at 103.

58. Plaintiffs request that this Court declare valid any signatures gathered prior to submission of the operative referendum petition on September 29, 2025 does not spare Count I from mootness. *See* Trial Tr. 109:14–112:8. First, for the reasons explained in the next part, Plaintiffs’ concerns regarding signatures are not yet ripe for review. But even if they were, the request for a declaration—and further relief predicated on that declaration—does not speak to the Secretary’s accepting referendum petitions as to form. There must be “a real, substantial, presently-existing controversy admitting of specific relief” to warrant a declaratory judgment. *Mo. Soybean Ass’n*, 102 S.W.3d at 25. Indeed, Plaintiffs readily concede that the implications of the Secretary’s denying the first three sample sheets as to form are “not an issue . . . at this stage.” Plaintiffs’ Pretrial Br. at 6. Because the concerns predicated Count I—that the Secretary accept the referendum petition as to form—are now satisfied in Plaintiffs’ favor, the Court has no basis for issuing any judgment on Count I.

59. Missouri recognizes two narrow exceptions to mootness. *Hail v. Hail*, 380 S.W.3d 655, 656 (Mo. App. W.D. 2012). First, a court may consider a case if it “becomes moot after” argument and submission. *Id.* (quoting *Jenkins v. McLeod*, 231 S.W.3d 831, 833 (Mo App. E.D. 2007)). But this case had not



reached that point prior to the Secretary's approval as to form. *See supra* ¶ 36.

The second exception is if a case “presents an issue that (1) is of general public interest and importance, (2) will recur and (3) will evade appellate review in future live controversies.” *In re Mo.-Am. Water Co.*, 516 S.W.3d 823, 829 (Mo. banc 2017) (citation omitted). This exception is “very narrow.” *Id.* It too does not apply. Assuming that the methods for filing a referendum petition are of general public interest and importance, *see No Bans on Choice v. Ashcroft*, 638 S.W.3d 484, 489 n.9 (Mo. banc 2022), the other two requirements are not met.

60. There is no indication that this kind of controversy will recur. To invoke the public-interest exception, Plaintiffs “must point to circumstances which take the possibility of recurrence out of the realm of pure speculation.” *Jackson Cnty. Bd. of Election Comm'rs ex rel. Brown v. City of Lee's Summit*, 277 S.W.3d 740, 745 (Mo. App. W.D. 2008) (citing *City of Los Angeles v. Lyons*, 461 U.S. 95, 109 (1983)). Plaintiffs have not carried this burden. Referendum petitioners in the past have waited until after a bill was signed into law before filing referendum sample sheets. *E.g., ACLU of Mo. v. Ashcroft*, 577 S.W.3d 881, 884 (Mo. App. W.D. 2019). Assuming that future petitioners will preemptively file sample sheets prior to a bill being signed is speculative. *Cf. Turlock Irrigation Dist. v. FERC*, 786 F.3d 18, 25 (D.C. Cir. 2015) (explaining that “‘predictions of future events (especially future actions taken by third parties)’ are too speculative”).

61. Even granting Plaintiffs some strong probability of recurrence, they have not shown that the question is capable of evading appellate review in the future. “For a case to evade review in future live controversies, the duration of the controversy must be so limited that it is not possible for a claim to be heard and appeals to be exhausted during its duration.” *Vernon Cnty. Republican Comm. ex rel. Haggard v. Lee*, 692 S.W.3d 439, 443 (Mo. App. W.D. 2024) (quoting *Bernhardt v. McCarthy*, 467 S.W.3d 348, 351 (Mo. App. W.D. 2015)). “Missouri courts have a long history of resolving cases involving election-related issues on an extremely expedited basis, and it is certainly possible for future claims, *if expedited*, to be heard and appeals to be exhausted within the statutory time constraints.” *Id.* (emphasis added). Plaintiffs did not seek expedited review—*e.g.*, a temporary restraining order—by this Court. Instead, Plaintiffs note the procedural history of this case to attempt to obviate their need to have requested expedited review, but none of this relieves them of not having done so. It would be incongruous now to accept their claim that this issue will evade review. *See Gartner v. Mo. Ethics Comm’n*, 323 S.W.3d 439, 442 (Mo. App. E.D. 2010) (declining to exercise the public-interest exception where future litigants can use mechanisms for expedited review).

62. Governing cases show how a question like this would be practically capable of expedited review in a future live controversy. For example, in *ACLU of Missouri v. Ashcroft*, after the Secretary rejected the proposed referendum

petition as to form, both this Court *and* the court of appeals issued rulings within thirty-two days of the plaintiffs filing their petition and request of a temporary restraining order. *See* 577 S.W.3d at 885–87. Again, unlike Plaintiffs in the present case, the ACLU “noted the urgency of time.” *Id.* at 885. As the Governor has forty-five days to sign the bill before it automatically becomes enacted, Mo. Const. art. III, § 31,<sup>4</sup> this issue *is* capable of review. Therefore, the public-interest exception to mootness does not apply.

63. The Court dismisses Count I of Plaintiffs’ First Amended Petition. The Secretary accepted the referendum petition as to form on October 14, 2025—giving Plaintiffs’ their desired relief. *See supra* ¶ 36.

### **B. Count II Is Not Ripe**

64. Count II of Plaintiffs’ Amended Petition also warrants dismissal because it requests relief predicated on concerns that may never happen. For a referendum petition to qualify for inclusion on the ballot, the proponent must collect signatures of “five percent of the legal voters in each of two-thirds of the congressional districts.” Mo. Const. art. III, § 52(a). In their requests for relief, Plaintiffs ask this Court to declare that Plaintiffs could gather signatures after filing the initial referendum petition on September 12, 2025. First Am. Pet. at

---

<sup>4</sup> The period to return the referendum petition is triggered by “final adjournment of the session of the general assembly which passed the bill,” Mo. Const. art. III, § 52(a), so the relevant time period for the Governor to act is governed by “[w]hen the general assembly adjourns,” *id.* art. III, § 31. This is “forty-five days.” *Id.*

12 (prayer for relief). They also seek an injunction prohibiting rejection of signatures collected from that date forward solely because they were gathered before the Secretary approved the operative petition as to form on October 14, 2025. *See id.* Plaintiffs, apparently, fear that they will not have collected sufficient valid signatures. *See* Mo. Const. art. III, § 52(a). But that fear is entirely speculative. *Cf. supra* ¶ 47.

65. Count II of the Amended Petition turns on a hypothetical, future injury—that the Secretary of State may reject some signatures and prevent Plaintiffs from meeting the necessary signature threshold. But this is “a situation that may never occur,” so this case is not ripe. *Local Union 1287*, 848 S.W.2d at 463. For one thing, the Secretary of State has not rejected any signatures—indeed, no formal determination by the Secretary has been made respecting the validity of the signatures at issue. *See* Trial Tr. 91:3–14.

66. Moreover, nowhere have Plaintiffs alleged that they will be unable to submit a final referendum petition with sufficient signatures if the Secretary rejects signatures collected prior to the submission or approval as to form of the now-approved sample sheet. Plaintiffs could very well gather enough signatures to meet or exceed their threshold without needing to rely on previously collected signatures. Their ground operation collected over 100,000 signatures as of mid-October, *see supra* ¶¶ 43–44, and Plaintiffs now claim to have collected over 300,000 signatures, *see supra* ¶ 47. Hence, their concern

about not meeting the signature threshold if the Secretary rejects signatures predating a valid referendum petition may never come to pass.

67. This is quintessentially a claim where the Court should avoid “premature adjudication” of an issue to prevent “entangling [itself] in [an] abstract disagreement.” *Graves v. Mo. Dep’t of Corrs., Div. of Prob. & Parole*, 630 S.W.3d 769, 773 (Mo. banc 2021) (citations omitted). Only if (a) the Secretary rejects these older signatures and (b) that rejection prevents Plaintiffs from meeting the signature threshold will the question presented in Count II “be ready for judicial decision.” *Local Union 1287*, 848 S.W.2d at 463. It is way too early for this Court to assume that either—let alone both—of those conditions will occur. Therefore, this Court dismisses Count II of Plaintiffs’ First Amended Petition.

### III. The Merits

68. Although the Court’s determination on the threshold matters fully disposes of this suit, the Court recognizes that these justiciability matters involve contentious questions. The merits, however, are much clearer. Hence, this Court exercises its discretion to address the substantive merits of Plaintiffs’ claims so that this entire case can be addressed in a single appeal without a remand. Ultimately, even if there is a justiciable controversy, this Court concludes that all of Plaintiffs’ claims fail as a matter of law.



69. First, for Count I, the Secretary of State rightly rejected Plaintiffs' previously filed petitions because House Bill 1 was not yet a law. Until Governor Kehoe signed House Bill 1 on September 28, 2025, it was merely a bill, not a law. Referendum petitions can only challenge enacted laws, not bills. Mo. Const. art. III, § 49 ("The people . . . reserve power to approve or reject by referendum any act of the general assembly . . ."). Hence, the Secretary correctly rejected the first three referendum petitions submitted as to form.

70. Second, because the first three petitions were invalid, any signatures collected on those petitions are likewise invalid. Missouri law is clear that there must be a valid petition before a referendum proponent can commence collecting signatures. § 116.332.1, RSMo; *see also* *ACLU of Mo.*, 577 S.W.3d at 890 (describing review under § 116.332 as "during the 'pre-signature collection stage' of the referendum process"). Hence, Plaintiffs' attempts to force the Secretary to accept signatures collected prior to a valid petition must fail.

**A. Count I—referendum petitions can only be had on enacted laws, so Plaintiffs' challenge fails as a matter of law.**

**1. Referendum petitions may only challenge enacted laws.**

71. All relevant provisions governing the referendum process make clear that a referendum petition can only be initiated against enacted laws, not bills. As the Missouri Supreme Court has long held, "the intendment of the framers of the [Missouri] Constitution was that all *laws*, except those declared non-



referable, should be subject to referendum.” *State ex rel. Moore v. Toberman*, 250 S.W.2d 701, 706 (Mo. banc 1952) (emphasis added). The form for submitting a referendum petition—specifically codified by statute—reflects this law requirement. It limits referendum petitions to “any law passed by the general assembly of the State of Missouri.” § 116.030, RSMo. Indeed, procedurally, in filing a referendum petition, the petitioner must cite “all sections of existing law or of the constitution which would be repealed by the measure.” *Id.* § 116.050.2(2). Bills, of course, are not “existing law” and they cannot be “repealed”—they have not yet been enacted.

72. Even putting common-sense syllogisms aside, the statute’s precise language serves a purpose. The statute’s use of “law” (as opposed to “bill”) is no accident, and courts must construe the statute to give effect to the legislature’s chosen words. *See State ex re. Bailey v. Fulton*, 659 S.W.3d 909, 912 (Mo. banc 2023) (“The primary goal of statutory interpretation is to give effect to legislative intent, which is most clearly evidenced by the plain text of the statute.” (quoting *State ex rel. Goldsworthy v. Kanatzar*, 543 S.W.3d 582, 585 (Mo. banc 2018))). “Law” has a specific meaning—a bill signed by the Governor (or not acted on by the Governor within his constitutionally allotted period). Mo. Const. art. III, § 31; *see also id.* § 21 (“No law shall be passed except by bill . . .”). As the Missouri Supreme Court has explained, under the current Missouri Constitution, “passage of a bill by the general assembly plus

its approval by the governor produces a validly enacted law.” *Brown v. Morris*, 290 S.W.2d 160, 166 (Mo. banc 1956).

73. Giving full construction to the statutes governing the referendum petition leads to a straightforward conclusion—only an enactment signed by the Governor can be challenged by a referendum. Hence, no petition filed prior to September 28, 2025, when Governor Kehoe signed House Bill 1, see Ex. 16, ¶ 24, could comport with statutory requirements.

74. Ultimately prevailing here requires Plaintiffs to articulate that the statute’s requirement for a submitted form to seek a referendum on “any law,” § 116.030, RSMo, “interfere[s] with or impede[s]” the constitutional right to a referendum, *No Bans on Choice*, 638 S.W.3d at 489 (quoting *Rekart v. Kirkpatrick*, 639 S.W.2d 606, 608 (Mo. banc 1982)). They fail at this task.

75. Beginning with the constitutional right of referendum, “restrictions on the people’s power of [referendum] must be found in the constitution.” *Coleman v. Ashcroft*, 696 S.W.3d 347, 352 (Mo. banc 2024). “Legislation to implement the referendum process is presumed to be constitutionally valid.” *No Bans on Choice*, 638 S.W.3d at 489. Ultimately, the statutory requirements that a proposed referendum challenge an enacted law pose no such impediment—they straightforwardly apply the Missouri Constitution itself.

76. The Missouri Constitution reserves to the people the power to “approve or reject by referendum *any act* of the general assembly.” Mo. Const. art. III,

§ 49 (emphasis added). This dispute boils down to whether an “act” of the legislature is a bill or a law. To answer this question, the Court must interpret Section 49 of the Missouri Constitution.

77. “This Court’s primary goal in interpreting Missouri’s constitution is to ascribe to the words of a constitutional provision the meaning that the people understood them to have when the provision was adopted.” *C.S. v. Mo. Highway Patrol Crim. Just. Info. Serv.*, 716 S.W.3d 264, 267 (Mo. banc 2025) (quoting *State v. Honeycutt*, 421 S.W.3d 410, 414–15 (Mo. banc 2013)). The initiative and referendum provisions of the Missouri Constitution, Article III, §§ 49–53, are derived from the initiative and referendum provision of the 1875 Missouri Constitution, Article IV, § 57 adopted in 1908. “This single-paragraph section [was] broken down in the present Constitution into five separate sections, numbered 49 to 53, inc[lusive].”<sup>5</sup> The referendum provisions, Sections 49, 52(a), and 52(b), contain a few clarifying words but otherwise are identical to the original provision.<sup>6</sup>

---

<sup>5</sup> *The Constitution of the State of Missouri: Adopted by the People on February 27, 1945, with Annotations and Appendix Comparing the Provisions Therein with the Provisions in the Constitution of 1875, as Amended and in Force on That Date* 55 (Lester G. Seacat, ed., 1945), [https://scholarship.law.missouri.edu/mo\\_constitutions\\_race/6/](https://scholarship.law.missouri.edu/mo_constitutions_race/6/).

<sup>6</sup> *Id.* at 55–57. Section 49: “The people reserve power to propose and enact or reject laws and amendments to the Constitution by the initiative, independent of the general assembly, and also reserve power to approve or reject by referendum any act of the general assembly, except as hereinafter provided.” (changes underlined). Section 52(a): no changes. Section 52(b): “The veto power of the governor shall not

78. Beginning with the text of Section 49, it states that “[t]he people reserve power to propose and enact or reject laws and amendments to the Constitution by the initiative, independent of the general assembly, and also reserve power to approve or reject by referendum any act of the general assembly, except as hereinafter provided.” The first part of this provision explicitly allows the people to “reject laws.” Although this refers to the initiative, traditionally “the initiative allows the electorate to *adopt* positive legislation.” *Ariz. State Leg. v. Ariz. Indep. Redistricting Comm’n*, 576 U.S. 787, 794 (2015) (emphasis added). Conversely, the referendum is the “negative check”—allowing voters to approve or reject legislation. *Id.* It would make little sense to allow for the rejection of only laws by initiative while allowing the rejection of bills by referendum. Rather, because the referendum is the people’s tool to reject laws, *see id.*, it makes more sense to use “reject[ing] laws” to inform the construction of an “act of the general assembly.”

79. At the very least, Section 49’s use of both “reject laws” and “reject . . . any act” creates an ambiguity. It certainly does not compel, as Plaintiffs assert,

---

extend to measures referred to the people. All elections on measures referred to the people shall be had at the general state elections, except when the general assembly shall order a special election. Any measure referred to the people shall take effect when approved by a majority of the votes cast thereon, and not otherwise. This section shall not be construed to deprive any member of the general assembly of the right to introduce any measure.” (change underlined). None of these changes have any bearing on the question of what may be challenged by a referendum.

that an unenacted bill qualifies as an “act.” *See* Trial Tr. 106:6–14. And sure enough, any potential ambiguity of Section 49 is resolved by Missouri Supreme Court decisions contemporaneous with the adoption of this initiative and referendum provision. *Cf. Edwards’ Lessee v. Darby*, 25 U.S. (12 Wheat.) 206, 210 (1827) (extolling “the construction of a doubtful and ambiguous law” by an authoritative body).

80. Specifically, these decisions show that an “act of the general assembly” is an enacted law, not a bill. As one case explained, the original referendum provision “preserved” the Governor’s veto “in the matter of enacting or defeating laws.” *State ex rel. Lashly v. Becker*, 235 S.W. 1017, 1022 (Mo. banc 1921). Thus, it followed that a “legislative act[] so referred [to the people] . . . include[d] the approval and veto power of the Governor.” *Id.* at 1023; *see also id.* (noting that “all legislative authority was vested in a given legislative forum (including the General Assembly and the Governor)”). As another case made clear, this understanding of what constituted a legislative act extended to the referendum: “This law is an act of the Legislature, and under [the referendum provision] of the Constitution is subject to the referendum.” *Fahey v. Hackmann*, 237 S.W. 752, 762 (Mo. banc 1922). So, historically construed, an “act” is not an unenacted bill. *See Moore*, 250 S.W.2d at 704 (“No one will contend that when the phrase in [an] old [constitutional provision] was brought forward into [the] present [provision] a different meaning was given in.”).



81. Plaintiffs rely on *State ex rel. Moore v. Toberman* to argue that the Governor's signature is not required for a referendum. But, in that case, the Missouri Supreme Court was interpreting "[t]he phrases 'law passed by the general assembly' and 'laws previously passed.'" 250 S.W.2d at 704 (quoting Mo. Const. art. III, § 29) (emphasis added). This both is a separate constitutional provision and lacks the same words and language of Section 49. Worse for Plaintiffs, *Moore* supports State Defendant's interpretation of "act of the general assembly" based on historical precedent. *See id.* ("No one will contend that when the phrase in [an] old [constitutional provision] was brought forward into [the] present [provision] a different meaning was given in.").

82. If that were not enough, the surrounding constitutional text in the referendum provisions also reinforces this understanding. Like statutes "passed in the same legislative session as part of the same legislative act, this Court must attempt to harmonize" these referendum provisions, which were all simultaneously adopted in 1945 Constitution. *State ex rel. T.J. v. Cundiff*, 632 S.W.3d 353, 357 (Mo. banc 2021). And the referendum provisions are materially the same as the original referendum and initiative provision adopted in 1908. *See The Constitution of the State of Missouri*, *supra* note 5, at 55–57. None of the other referendum provisions use "act," so the meaning of "act" cannot be readily taken from these provisions. *See* Mo. Const. art. III, §§ 52–53. However, the meaning of "act" can be discerned from



“harmoniz[ing]” Section 49 with its implementing provisions. *State ex rel. T.J.*, 632 S.W.3d at 357. Notably, in detailing the referendum exceptions and procedures, Section 52(a) uses both “law[]” and “bill.” (None of the other provisions use either these terms in context.<sup>7</sup>) Examining how Section 52(a) uses these terms shows that an “act” can only be a law.

83. Section 52(a) establishes the procedure for how to refer a law to the people: the signature requirements and the timing. But in doing so, it excepts “laws” dealing with public emergencies and appropriations—not “bills.” *Id.* This word choice is telling. The exception is for the substance of enacted laws. If a public-emergency or appropriations provision—once enacted into law—will ultimately be exempted from a referendum, then it would be absurd and contradictory to allow a referendum petition to proceed before that bill has been signed by the Governor (or has become law if the Governor failed to act within the allotted time). Any other reading—allowing for an unenacted bill to get referred—would disharmonize the meaning of this constitutional provision. Instead, the plain meaning of this provision confirms that a referendum may only be initiated on an enacted law.

84. “Bill” is used in the timing sentence of Section 52(a): “Referendum petitions shall be filed with the secretary of state not more than ninety days

---

<sup>7</sup> Article III, Section 53 uses “laws,” but it is not in reference to the subject of a referendum petition.

after the final adjournment of the session of the general assembly which passed the bill on which the referendum is demanded.” Unlike with “law” in the first sentence, “bill” is not used in reference to the subject of the referendum. Instead, it is part of the restrictive clause (“which passed the bill on which the referendum is demanded”) giving essential information about the time requirements. As the timing provision links filing the referendum petition with the “adjournment of the session of the general assembly,” it stands to reason that the Constitution would link the time with general assembly’s part of the legislative action—“pass[ing] the bill.” See Mo. Const. art. III, § 31 (“Every bill which shall have passed the house of representatives and the senate . . .”). So Section 52(a)’s “bill” does not give meaning to an “act” of the General Assembly.

85. Finally, the Missouri Supreme Court has recently recognized that the referendum can only be had on a bill “signed [into law] by the governor.” See *No Bans on Choice*, 638 S.W.3d at 491 (determining that a referendum campaign benefitted when “the challenged legislation [was] signed by the governor . . . 113 days before the final adjournment of the legislative session”). All told, statutory and constitutional text, history, precedent, and common sense show that the Missouri Constitution did not grant a right to pursue referenda against uncoded bills. Cf. *Cummings v. Missouri*, 71 U.S. (1 Wall.) 277, 325 (1866) (“The Constitution deals with substance, not shadows.”).

Because only a codified law can predicate a referendum, the Secretary properly concluded that the first three referendum petitions could not proceed. Hence, the Secretary correctly rejected Plaintiffs' referendum petitions submitted before House Bill 1 was signed into law.

**2. Because the first three petitions did not challenge an enacted law, the Secretary properly rejected the petitions as to form.**

86. Under the governing statute, the Secretary could not approve the first three petitions as to form because they challenged bills, not enacted laws. As previously explained, the form codified in Section 116.030 requires a "law." See § 116.030, RSMo ("on any law passed by the general assembly"); *id.* (form has a blank for "title of law"). "Though the phrase 'sufficiency as to form' in section 116.332 is not afforded an express statutory definition, section 116.030 effectively serves as the definition for the phrase . . . ." *ACLU of Mo.*, 577 S.W.3d at 890. The Secretary of State's review under Section 116.332 is "limited to determining whether the sample sheet is substantially in the form required by section 116.030." *Id.* at 892.

87. Part of this review is ensuring "compliance" over the "insertion of required or requested information" in "blank spaces." *Id.* at 891. One of these blank spaces is for the "title of law." § 116.030, RSMo. The statute also requires that the referendum proponent attach to the form "all sections of existing law . . . which would be repealed by the measure." *Id.* § 116.050.2(2)

(emphasis added). The first three referendum petitions were not for an enacted law and did not “[i]nclude all sections of existing law . . . which would be repealed by the measure,” so the Secretary of State properly rejected these sample sheets. *Id.* Said differently, there was no “law” with a “title” capable of meeting the form’s requirements prior to the Governor’s signing House Bill 1. *Id.* § 116.030.

88. Confirming that a petition is sufficient as to form is not a mere clerical act. It helps ensure that “the constitutional requirements [for placing a measure on the ballot] have been met.” *Mo. Elec. Coops. v. Kander*, 497 S.W.3d 905, 913–14 (Mo. App. W.D. 2016) (alteration in original) (quoting *Missourians to Protect the Initiative Process v. Blunt*, 799 S.W.2d 824, 828 (Mo. banc 1990)). The Secretary’s review of the petition is limited as to form. Specifically, the Secretary cannot reject as to form a petition whose aim may not be lawful. *See ACLU of Mo.*, 577 S.W.3d at 891 (explaining that “the plain and ordinary dictionary meaning of the word ‘form’” precluded substantive legal review of the referendum’s aim); *accord id.* at 891 (reasoning that “the qualifier ‘as to form’ would be rendered unnecessary and superfluous if review of a sample sheet for ‘sufficiency’ extended to all matters, including substantive and constitutional matters”). Plaintiffs therefore try to pigeonhole the denials of the first three sample sheets as rejections rooted in substantive legal concerns.

89. But finding obvious deficiencies from noncompliance with the rules of the statutory form (like attaching an unsigned bill rather than a “law”) are not judgments based substantive legal considerations—and the Secretary need not approve forms with basic deficiencies. *See ACLU of Mo.*, 577 S.W.3d at 891 (citing a definition of “form” as a “procedure according to rule or rote” (quoting WEBSTER’S THIRD NEW INTERNATIONAL 892 (1993))). Allowing a referendum petition on a bill would not comport with the statutory meaning of “law.” § 116.030, RSMo. Meanwhile, correctly construing “law” does not render any provision “unnecessary and superfluous.” *ACLU of Mo.*, 577 S.W.3d at 891.

90. Plaintiffs’ only effort to grapple with the text of Section 116.030 is their assertion that the “language says nothing about the governor signing [the bill] nor requires that a proponent wait to submit a referendum sample sheet until the governor signs a bill.” Plaintiffs’ Opp. MTD at 9; *see also* Plaintiffs’ Pretrial Br. at 4. But including a reference in the statute to the Governor’s signature would be odd, and even problematic. The statute requires that the petition seek to refer “any law.” § 116.030, RSMo. Legislation only becomes enacted law after either the Governor signs the bill or the time for the Governor to act on the bill expires. Mo. Const. art. III, § 31. So a statutory reference to the Governor’s signature would be both superfluous and potentially confusing given that a bill can become law through the Governor’s inaction. *See id.* (“If any bill shall not be returned by the governor within the time limits prescribed



by this section it shall become law in like manner as if the governor had signed it.”). Hence, contrary to Plaintiffs’ suggestions, the Secretary acted in accordance with his role in denying as to form petitions that did not comply with the form prescribed by the statute itself. So the Secretary did not exceed his authority under Section 116.332.1 when he rejected the first three referendum petitions as to form.

91. And beyond labels, rejecting the sample sheets as to form complies with the Constitution. In their effort to prevail, Plaintiffs place a lot of emphasis on an absolute right to ninety days to collect signatures. *See* Trial Tr. 98:17–99:19 (arguing that waiting for the Governor’s signature eats into this time). But nothing supports an unqualified right to that timeframe. *See infra* ¶¶ 100–01.

92. “The legislature inherently has the power to reduce the time to circulate a referendum petition on any particular piece of legislation by delaying the passage of that legislation until the end of the legislative session.” *No Bans on Choice*, 638 S.W.3d at 491. The Legislature passing the bill and the Governor signing it are both part of the legislative process. Mo. Const. art. III, § 31. Even though Governor Kehoe did *not* use all allotted time to sign the redistricting bill, the Missouri Supreme Court has recognized that the governor has the practical ability to wait before signing a bill and thus “reduce the time to circulate a referendum petition.” *See No Bans on Choice*, 638 S.W.3d at 491.



93. This is not a mere “procedural formalit[y].” *See id.* at 492. A referendum petition seeking to challenge a bill before this lawmaking process ends is simply not a valid form that the Secretary can approve. Therefore, the Secretary of State correctly rejected as to form Plaintiffs’ referendum petitions submitted before the Governor had signed House Bill 1 into law without creating an unnecessary impediment on the ability to bring a referendum petition. *See id.*; *see also* Trial Tr. 118:16–119:1.

94. The facts of this case also demonstrate that waiting for the Governor’s signature did not impede the referendum effort. *See supra* ¶¶ 46–47.

95. The Court accordingly awards judgment to Defendant on Count I.

**B. Count II—Missouri law does not permit gathering signatures prior to a valid referendum petition, so Plaintiffs’ challenge fails as a matter of law.**

96. Plaintiffs’ efforts to force the Secretary to accept signatures gathered prior to the existence of a valid referendum petition must also fail. As discussed above, Plaintiffs submitted three referendum petitions before House Bill 1 was signed into law by the Governor. The Secretary of State properly rejected these petitions as to form. Because these petitions were invalid, all signatures collected in support of them occurred “during the ‘pre-signature collection stage’ of the referendum process.” *ACLU of Mo.*, 577 S.W.3d at 890 (emphasis added). Section 116.332.1 specifically requires that a petitioner have submitted a valid sample sheet to the Secretary of State “[b]efore . . . a

referendum petition may be circulated for signatures.” If a valid sample sheet must be submitted to allow signature gathering, signatures collected on a sample sheet rejected as to form are *per se* invalid. Hence, under the statute and because no valid referendum petition yet existed, the Court cannot order the Secretary to count any signatures gathered prior to September 28, 2025.

97. And because the rejection of referendum petitions as to form did not “interfere with or impede a right conferred by the constitution,” not counting those signatures can no more “interfere with or impede” the constitutional right of the referendum. *See No Bans on Choice*, 638 S.W.3d at 489 (quoting *Rekart*, 639 S.W.2d at 608). Nothing in Missouri law prohibits requiring that a proponent submit a valid referendum petition before collecting signatures. The Missouri Supreme Court has held that the signature-circulation time periods under Section 116.332.1 for an initiative are “established by Mo. Const. art. III, § 50.” *State ex rel. Upchurch v. Blunt*, 810 S.W.2d 515, 517 (Mo. banc 1991). Section 50 is the form-and-procedure provision for initiative petitions, and its only explicit time requirement is that the initiative petition be “filed . . . not less than six months before the election.” Mo. Const. art. III, § 50; *see also Upchurch*, 810 S.W.2d at 517. Nonetheless, the Supreme Court held it “clear” that the time period was “framed by reference to general elections” and initiative petition sample sheets could only be submitted “after one general election.” *Upchurch*, 810 S.W.2d at 517.

98. Article III, Section 52(a) of the Missouri Constitution is the referendum-provision analog to Section 50. Section 52(a) also only has one explicit time requirement: Referendum petitions must be “filed . . . not more than ninety days after the final adjournment of the session.” Like with Section 50, Section 52(a)’s time period is equally “clear.” See *Upchurch*, 810 S.W.2d at 517. Here, the time period is properly framed by reference to “laws.” See Mo. Const. art. III, § 52(a) (excepting emergency and appropriations “laws”). “Although the authority is not semantically explicit, the constitutional provision[] [is] nonetheless plain in meaning.” See *Upchurch*, 810 S.W.2d at 517. Therefore, Section 52(a) permits submission of sample referendum petitions to the Secretary of State from any time after enactment until ninety days after the final adjournment of the session.

99. This point is illustrated by *State ex rel. Basinger v. Ashcroft*, 677 S.W.3d 562 (Mo. App. W.D. 2023), which operationalized *Upchurch*. There, a petitioner had filed his sample initiative petition for 2024 election two months before 2022 election and thus was outside the time period proscribed by Section 50 as interpreted by *Upchurch*. *Id.* at 567. As a result, the Secretary of State’s obligation to process the initiative petition “did not arise until” after the election. *Id.* Allowing the petitioner in *Basinger* to have counted any signatures collected in the meantime would have defeated the court’s ruling. Besides a different constitutional time period, referendum petitions are no

different. Hence, the Missouri Constitution does not allow the Secretary of State to count signatures collected before the enactment of House Bill 1.

100. Plaintiffs' only effort to engage with Section 52(a) is to say that the "plain language" requires that a referendum proponent have "at least ninety days to gather signatures." Plaintiffs' Pretrial Br. at 9–10; *see also* Plaintiffs' Opp. MTD at 15 ("Plaintiffs have *at least* ninety days to gather signatures."). This position disregards the actual text, harmonizing constitutional provisions, and precedent. First, the "plain language" does not grant proponents a right to a firm ninety-day signature-gathering window. Section 52(a) only sets a due date for petitions to "filed." Mo. Const. art. III, § 52(a) (emphasis added). Nothing in the text creates a right to ninety days to collect signatures. Finding such a right would require reading out "not more than ninety days" and changing it to "at least ninety days." *See id.* Even ignoring Plaintiffs' effort to convert Section 52(a)'s language from "not more than" to "at least" ninety days, it is likewise nonsensical to suggest that the words "be filed" means "gather signatures." *See id.*

101. Second, because no law (except for an appropriation act) can "take effect until ninety days after the adjournment," *id.* § 29, Section 52(a)'s requirement that a referendum petition be filed within ninety days after adjournment is "consistent" with Section 29. *See ACLU of Mo.*, 577 S.W.3d at 888–89; *see also Upchurch*, 810 S.W.2d at 516 ("This Court is required to give

due regard to the primary objectives of the constitutional provision under scrutiny, as viewed in harmony with all related provisions.”). Finding a novel right to ninety days for a proponent to collect signatures would break this harmony.

102. Third, Plaintiffs suggest that this “situation is different” because House Bill 1 was passed on the last day of the legislative session. Plaintiffs’ Pretrial Br. at 10; *see also* Plaintiffs’ Opp. MTD (“Depending on when the General Assembly passes the legislation, a proponent of a referendum may have more than ninety days to gather signatures.”). But “delaying the passage of that legislation until the end of the legislative session” does not alter when a petition is due—constitutionally reducing Plaintiffs’ time to collect signatures. *No Bans on Choice*, 638 S.W.3d at 491. And “[t]he fact that the governor did not approve the bill until after the beginning of the recess does not arrest” the constitutional deadline for submitting a referendum petition. *Moore*, 250 S.W.2d at 704. Plaintiffs’ aspirational interpretation of Section 52(a), *see* Trial Tr. 98:21–99:4, must give way to the provision’s plain meaning.

103. As for signatures collected on the fourth referendum petition before the Secretary of State’s approval, these too are invalid. In *No Bans on Choice*, the Missouri Supreme Court held that the statutory “prohibition on collecting referendum petition signatures prior to the Secretary’s certification of the official ballot title ‘interferes with and impedes’ the constitutional right of



referendum.” 638 S.W.3d at 492. The Secretary of State proceeds to certifying the ballot title only after the referendum petition is deemed sufficient as to form, *see* § 116.334, RSMo, but while this ballot title certification is ongoing, the petitioner has an approved referendum petition, *see No Bans on Choice*, 638 S.W.3d at 492. But unlike certifying the ballot title, the Secretary’s approval of the referendum petition “occur[s] at the beginning of the process.” *Coleman*, 696 S.W.3d at 351. This approval is vitally “important” to protecting the “citizens’ constitutional power of [referendum] petition.” *See id.* at 351–52. It allows the Secretary of State to correct an error in form “with minimum disruption.” *Id.* at 351.

104. Permitting petitioners to collect signatures on a referendum petitions before approval as to form will sow confusion. For example, a voter wanting to sign a referendum petition could (as here) sign an invalid referendum petition. But when later approached with a valid referendum petition over the same law, he might not sign it believing he had already signed a previously valid petition. In this way, his signature could go uncounted. In other words, signatories may have never realize that they signed an invalid petition. Alternatively, one could imagine a situation where the first petition were valid. But the voter, believing the first petition was invalid, signed a second petition and unwittingly exposed himself to liability for ballot fraud. *See* § 116.090.1(1), RSMo. Providing basic ground rules to keep overzealous



proponents from gathering signatures on invalid petitions does not “interfere with or impede” the citizens’ right of referendum. *See No Bans on Choice*, 638 S.W.3d at 489. The Secretary’s approval as to form provides a clear line of demarcation to voters for when they can safely sign a referendum petition and have their voice heard, and this Court cannot order the Secretary to count any signatures prior to his approval as to form.

105. Therefore, this Court enters judgment for Defendant on Count II.

#### **IV. Denial of Injunctive Relief**

106. Given the legal deficiencies in all Counts, Plaintiffs’ requests for permanent-injunctive relief necessarily fail. *See Est. of Hutchison*, 494 S.W.3d at 608 (explaining that “at the permanent injunction stage, the trial court must finally determine the merits of the claims” (citation omitted)). The merits favor the Defendant here—and so do the equities.

107. Plaintiffs have not articulated any harm warranting a mandatory injunction. *See, e.g., Rebman v. Parson*, 576 S.W.3d 605, 612 (Mo. banc 2019) (finding irreparable harm based on a record of how the governmental action impacted the plaintiff). Plaintiffs failed to allege any inability to collect the requisite signatures—even if their pre-enactment and pre-approval signatures are rejected—within the constitutional time period. *See generally* First Am. Pet.; *see also Suppes*, 613 S.W.3d at 847 (“To be entitled to an injunction, a

party must demonstrate: 1) no adequate remedy at law; and 2) irreparable harm will result if the injunction is not awarded.” (citation omitted)).

108. And in litigating this case, Plaintiffs have never articulated an inability to meet the signature thresholds if their pre-approval signatures are not counted. *See supra* ¶¶ 45–46. Plaintiffs have therefore failed to carry their burden of showing a harm warranting a permanent injunction. *See Suppes*, 613 S.W.3d at 847 (citation omitted); *see also Trump v. CASA, Inc.*, 606 U.S. 831, 854 (2025) (“[I]n equity, ‘the broader and deeper the remedy the plaintiff wants, the stronger the plaintiff’s story needs to be.’” (citation omitted)).

109. Moreover, Plaintiffs failed to request injunctive relief for their Count II, only requesting an injunction to prohibit the Secretary from rejecting signatures in their prayer for relief. *See* First Am. Pet. ¶¶ 79–86; *id.* at 12 (prayer for relief). But “[g]enerally, the prayer for relief is not considered part of the petition.” *City of Greenwood v. Martin Marietta Materials, Inc.*, 311 S.W.3d 258, 264 (Mo. App. W.D. 2010). “This rule is particularly applicable in equitable proceedings.” *Id.* (citation omitted). Courts can grant unrequested relief only if it resolves “‘issues raised by the allegations in the cause pleaded’”; courts cannot “decid[e] an *unpleaded* factual issue.” *Id.* (citation omitted).

110. Therefore, Plaintiffs are not entitled to injunctive relief for their Count II because they have neither requested it nor “fully supported [it] by facts” that “were either pleaded or tried by consent.” *Id.* at 264–65 (citation omitted).

## ORDER AND JUDGMENT

Now, therefore, this Court rules as follows:

- a. The Court **DISMISSES** this case for want of a justiciable controversy.
- b. Alternatively, the Court enters judgment in favor of the State on all counts of the First Amended Petition for Declaratory Judgment and Injunctive Relief.
- c. The Court **DENIES** all relief requested in the First Amended Petition.
- d. To the extent any motions or claims for relief remain outstanding and are not addressed herein, those motions or claims for relief are **DENIED**.
- e. All prior rulings are **INCORPORATED HEREIN BY REFERENCE** to the extent necessary to create a final and appealable order.
- f. Costs are **TAXED** to Plaintiff.
- g. This is the final order and judgment of this Court.

**SO ORDERED** on this \_\_\_\_ day of \_\_\_\_\_, 202\_\_.

---

The Honorable Christopher K. Limbaugh

Not an Official Court Document

**WRIT  
EXHIBIT 23**

Not an Official Court Document

**WRIT  
EXHIBIT 23**

IN THE CIRCUIT COURT OF COLE COUNTY, MISSOURI

PEOPLE NOT POLITICIANS, *et al.*, )  
 )  
 Plaintiffs, )  
 )  
 v. ) Case No. 25AC-CC07128  
 )  
 MISSOURI SECRETARY OF STATE, )  
 )  
 Defendant, )  
 )  
 and )  
 )  
 PUT MISSOURI FIRST, )  
 )  
 Intervenor. )

**PROPOSED JUDGMENT**

This Court called the above-captioned case. Plaintiffs were represented by counsel Chuck Hatfield and Greta Bax. Defendant was represented by counsel Bill Seidleck and Jacqueline Bryant. Intervenor was represented by counsel Marc Ellinger and Stephanie Bell.

Intervenor's Motion for Sanctions was taken up and taken under advisement. Plaintiffs were subject to this Court's Order compelling them to provide documents responsive to Intervenor's Requests for Production of Documents issued on December 4, 2025. Plaintiffs not only failed to produce documents but intentionally advised Intervenor that such documents would be filed with the Secretary of State and that Intervenor could obtain records from the Secretary in the ordinary course of business later in the week. At the hearing, Counsel for Plaintiffs advised that they would eventually produce such documents and further advised that they had filed a Petition for a Writ of Prohibition related to this Court's Order. At this point, no Writ has been

issued by the Court of Appeals. Accordingly, this Court sustains Intervenor's Motion for Sanctions and, pursuant to Rule 61.01(b), strikes Plaintiffs' pleadings. Since those pleadings are stricken, this Court finds that no relief may be granted and thus enters Judgment in favor of the Intervenor and Defendant and against Plaintiffs.

Previously, Intervenor and Defendant filed Motions to Dismiss Plaintiffs' First Amended Petition. This Court heard arguments on those Motions on December 4, 2025, and took them under advisement. This Court now takes up those Motions and determines that the Motions are well-taken. Plaintiffs' claims in Count I of their Amended Petition are moot and are dismissed with prejudice. Plaintiffs' claims in Count II of their Amended Petition fail to state a justiciable claim upon which relief may be granted as they are not ripe for adjudication. Until Defendant makes a final determination as to the sufficiency or insufficiency of any of the referendum petitions, there is no claim properly before this Court. After such decision by the Defendant, Plaintiffs, if aggrieved, can seek their sole and exclusive remedy: judicial review under Section 116.200, RSMo.

In the interests of judicial efficiency and economy, this Court addresses the merits of Plaintiffs' Amended Petition.

### PROCEEDINGS

Plaintiffs offered an Amended Joint Stipulation of Facts and Exhibits, incorporating 15 exhibits, which was admitted by this Court. Plaintiffs offered an earlier Joint Stipulation of Facts and Exhibits which to which Intervenor objected, and specifically objected as to paragraphs 23, 29, and 32. This Court admitted the earlier Joint Stipulation over the objection. As no evidence was adduced to substantiate those paragraphs, the Court gives them no weight.



This Court heard testimony from Chrissy Peters, the Election Director for the Missouri Secretary of State. Argument was taken, and the case was submitted.

## FACTS

People Not Politicians is a campaign committee organized in the State of Missouri. Amended Joint Stipulation of Facts and Exhibits (“Am.Stip.”), ¶1. Richard von Glahn is a Missouri citizen, resident of St. Louis County, a taxpayer, and qualified voter in the State of Missouri. Am.Stip., ¶2. Richard von Glahn is the proponent of the referendum petitions 2026-R001; 2026-R002; 2026-R003; and 2026-R004. Am.Stip., ¶3. Denny Hoskins is the Missouri Secretary of State. Am.Stip., ¶4. Intervenor Put Missouri First is a political action committee organized in Missouri and an opponent to the referendum petitions. Verified Motion to Intervene.

On September 12, 2025, the Missouri General Assembly “truly agreed and finally passed” House Bill 1. Am.Stip., ¶6. Richard von Glahn submitted two referendum petition sample sheets (2026-R001 and 2026-R002) to the Secretary of State’s Office on September 12, 2025, seeking a referendum on House Bill 1. Am.Stip., ¶9 and Ex. 4, 5. Richard von Glahn submitted a third referendum petition sample sheet (2026-R003) to the Secretary of State’s Office on September 15, 2025. Am.Stip., ¶16 and Ex. 8. On September 26, 2025, the Secretary of State rejected Richard von Glahn’s referendum petition sample sheets (2026-R001, 2026-R002, and 2026-R003) as to form. Am.Stip., ¶22. Those rejections were based on an opinion letter issued by Attorney General Catherine Hanaway. Ex. 11.

Governor Mike Kehoe signed House Bill 1 (2025) on September 28, 2025. Am.Stip., ¶24. On September 29, 2025, Richard von Glahn submitted a fourth referendum petition sample sheet (2026-R004) to the Secretary of State’s

Office. Am.Stip., ¶25 and Ex. 12. On October 14, 2025, the Secretary of State approved the fourth referendum petition sample sheet as to form (2026-R004). Am.Stip., ¶27 and Ex. 13.

Referendum petitions on House Bill 1 have been circulated for signatures. Am.Stip., ¶32. No signed referendum petitions have been submitted to the Secretary of State regarding House Bill 1. Am.Stip., ¶33.

If petitions are submitted, the Secretary's office will follow its normal signature verification process on any such submitted petitions. TR.50:25-51:2. No final decision has been made on the sufficiency or insufficiency of the four referendum petitions. Tr.50:21-24. The Secretary has not issued a certificate of sufficiency or insufficiency on any of the four referendum petitions. Tr.49:19-22. The Secretary has not rejected any signatures on any of the four referendum petitions. Tr.49:23-24.

### COUNT I

With respect to Count I, the Secretary's review of the form of a petition necessarily entails determining if the subject matter of a petition is an eligible basis for a petition. If a petition were filed to seek a referendum on a bill that was already in effect, such as pursuant to an emergency clause from a prior year's session (e.g. 2024), there can be no referendum called. Similarly, if a referendum petition was sought on a bill that never passed the General Assembly that would not be a valid petition as to form.

Here the first three versions of the referendum petition (numbers 2026-R001, 2026-R002, and 2026-R003) were all submitted prior to the Governor signing House Bill 1. Until a bill, passed by the General Assembly, is signed by the Governor there is no law on which a referendum could be called. The premature filing of the referendum petition versions prior to the Governor's

signature removes entirely a constitutional power of the Governor under Article III, Section 31 of the Missouri Constitution (to approve, veto or take no action on a bill).

The Secretary had a threshold obligation to review the form of the petition and determine if it met with the referendum petition requirements. Section 116.120, RSMo, requires such a review. For an initiative petition, that petition could be rejected for failure to underline new text or strike out old text. See Section 116.050, RSMo. That form review necessarily involves a review of what is attached (the language or a bill). If Petitioners had omitted a page of House Bill 1, the Secretary could reject under Section 116.050, RSMo. The Secretary can therefore determine if a law has been signed by the Governor and not yet subject to the referendum clause of the Missouri Constitution.

This Court finds that the Secretary had the authority and the obligation to reject petitions 2026-R001, 2026-002, and 2026-R003. All relief, which solely relies on the Secretary's authority, requested in Count I is denied.

## COUNT II

This Court heard testimony that not one signature has been rejected by the Secretary. Further, that those decisions will only be made at the time a Certificate of Sufficiency or Insufficiency is issued by the Secretary. To compel the Secretary to count signatures at this point would be premature. There is no dispute that the Petitioners or their agents have circulated the petitions for signatures. Once those signature pages are submitted, there is a verification process established under Sections 116.120 and 116.130, RSMo. Only after that process can the Secretary make any determination of whether the signatures are sufficient to call a referendum election.

This Court finds that based on the evidence presented in the Amended Joint Stipulation and the testimony of Chrissy Peters and also on the arguments and the law, that no decision has been made about individual signatures counting or not counting. A decision on those signatures is premature. It is entirely possible that Plaintiffs will obtain a sufficient number of valid signatures which were obtained after the approval as to form of the referendum petition on October 14, 2025. If that occurs, then Count II would be moot.

Plaintiffs did not put on any evidence that without this Court acting on Count II the referendum petition would fail to be sufficient. It is Plaintiffs' burden to prove this fact and they have not attempted, much less succeeded, in doing so.

Finally, if the Secretary rejects any of the signatures for any reason, including the date of such signatures, causing the referendum to be insufficient, Plaintiffs have an express and guaranteed statutory remedy to bring an action against the Secretary under Section 116.200, RSMo. This is the process that must be followed and this Court will not undertake that process now, when it is not necessary and may never be necessary.

This Court finds that Plaintiffs have no cause of action under Count II at this time and further that they have failed to carry their burden of proof to show actual harm absent relief under Count II. Accordingly, the relief under Count II is denied.

### **ORDER AND JUDGMENT**

This Court hereby orders and adjudges that Plaintiffs are not entitled to relief on their First Amended Petition as to Counts I or II. All relief is therefore denied.

So ORDERED and ADJUDGED this \_\_\_\_\_ day of December 2025.

Honorable Christopher K. Limbaugh  
Judge, Division 4

WRIT  
EXHIBIT 24

**WRIT**

**EXHIBIT 24**



IN THE CIRCUIT COURT OF COLE COUNTY  
STATE OF MISSOURI

PEOPLE NOT POLITICIANS, et. al., )  
Plaintiffs, )  
MISSOURI SECRETARY OF STATE, )  
DENNY HOSKINS )  
Defendant. )

Case No. 25AC-CC07128

ORDER

This matter was taken up for trial on December 8, 2025, and proposed judgments were submitted on December 10, 2025.

Generally, the issue before the court is whether or not Secretary Hoskins can reject signatures for referendum petitions three and four which were submitted to his office by the plaintiffs. Just after the trial was held, the plaintiffs submitted more than 300,000 signatures to Secretary Hoskins for certification. Currently, to the court's knowledge, no signatures have been officially accepted or rejected. Conceivably, this could be enough signatures to place the referendum on the ballot thereby mooting the issues presented in the case at bar.

Therefore, the court will hold this case in abeyance until the requisite number of signatures have been certified or up until enough signatures have been rejected so as to prevent plaintiffs' referendum from appearing on the ballot. It is further ordered that Secretary Hoskins preserve all signatures filed with his office, whether those signatures are accepted or rejected, until further order by this court.

SO ORDERED.

Dated 12/12/2025

  
\_\_\_\_\_  
Christopher K. Limbaugh  
Circuit Judge

Court Document Not an Official Court Document Not an Official Court Document Not an O  
Official Court Document Not an Official Court Document Not an Official Court Document  
t Not an Official Court Document Not an Official Court Document Not an Official Court Do  
Document Not an Official Court Document Not an Official Court Document Not an Official  
al Court Document Not an Official Court Document Not an Official Court Document Not an  
an Official Court Document Not an Official Court Document Not an Official Court Document  
nt Not an Official Court Document Not an Official Court Document Not an Official Court D  
t Document Not an Official Court Document Not an Official Court Document Not an Official  
cial Court Document Not an Official Court Document Not an Official Court Document Not  
ot an Official Court Document Not an Official Court Document Not an Official Court Docum  
ent Not an Official Court Document Not an Official Court Document Not an Official Court  
ut Document Not an Official Court Document Not an Official Court Document Not an Offic  
ficial Court Document Not an Official Court Document Not an Official Court Document Not  
ot an Official Court Document Not an Official Court Document Not an Official Court Docum  
ment Not an Official Court Document Not an Official Court Document Not an Official Cou  
urt Document Not an Official Court Document Not an Official Court Document Not an Offi  
Official Court Document Not an Official Court Document Not an Official Court Document N  
Not an Official Court Document Not an Official Court Document Not an Official Court Docu

# WRIT EXHIBIT 25

IN THE CIRCUIT COURT OF COLE COUNTY

STATE OF MISSOURI

PEOPLE NOT POLITICIANS, et al.,

Plaintiffs,

VS.

Case No: 25AC-CC07128

MISSOURI SECRETARY OF STATE

DENNY HOSKINS,

Defendant.

MEMORANDUM ON STATUS OF SIGNATURE VERIFICATION

Plaintiffs People Not Politicians and Richard von Glahn provide this Court with an update on the status of signature verification since this Court issued its December 12, 2025 order holding this matter in abeyance.

On December 9, 2025, Plaintiffs People Not Politicians and Richard von Glahn submitted over 300,000 signatures to the Secretary of State. Attached hereto as Exhibit A is the Referendum Receipt Form submitted to the Secretary of State contemporaneously with the submission of the signature pages. This Receipt was signed both by the referendum proponent Richard von Glahn and **the Secretary of State's Director of Elections** Chrissy Peters.

**On January 5, 2026, the Secretary of State's Office provided Mr. von Glahn** with a verification of the number of signature pages submitted to each county for signature verification and counting. Attached hereto as Exhibit B is the **Secretary of State's letter along with the verification reports. Exhibit B shows that** a total of 33,068 pages were deemed valid and submitted to the local election authorities. Exhibit B also shows that 16,695 pages were deemed invalid and not

submitted to the local election authorities for further counting and verification.<sup>1</sup>

The Director of Elections explained in a separate email that petition pages were separated and deemed “valid” or “invalid” due to the date of the signatures.

Attached hereto as Exhibit C is a true and correct copy of that email.

As the Secretary of State continues the process of counting and verifying the signatures submitted by Plaintiffs, Plaintiffs will provide this Court with updated information and documents that may affect the status of this matter.

Respectfully submitted,

STINSON LLP

/s/ Charles W. Hatfield

Charles W. Hatfield, MO No. 40363

Alexander C. Barrett, MO No. 68695

Alixandra S. Cossette, MO No. 68114

Greta M. Bax, MO No. 73354

230 West McCarty Street

Jefferson City, Missouri 65101

573.636.6263

573.636.6231 (Facsimile)

chuck.hatfield@stinson.com

alexander.barrett@stinson.com

alix.cossette@stinson.com

greta.bax@stinson.com

*Attorneys for Plaintiffs*

<sup>1</sup> Plaintiffs dispute that any signature pages or signatures are invalid.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served on all parties via the Missouri E-filing system on January 5, 2026.

/s/ Charles W. Hatfield

Attorney for Plaintiffs

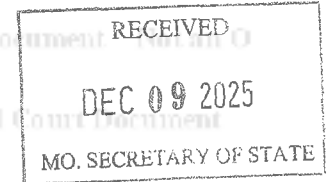
**WRIT**  
**EXHIBIT 26**







DENNY HOSKINS, CPA  
SECRETARY OF STATE  
STATE OF MISSOURI



Time Submitted

9:57

BOX RECEIPT

This is to acknowledge that, on the 9<sup>th</sup> day of December, 2025, the Secretary of State's Office for the State of Missouri, did receive 141 boxes of referendum petition pages on behalf of People Not Politicians (Petitioner or Organization).

Acceptance of this referendum and issuance of this receipt does not constitute a determination by the Secretary of State's Office that the petition was submitted in accordance with Chapter 116, RSMo.

Secretary of State Representative

Representative of Petitioner or Organization  
Submitting Initiative Petition Pages

Richard VAN GELDEREN

(print name of petitioner or representative)

COPY

# Referendum INITIATIVE PETITION RECEIPT FORM

RECEIVED

DEC 09 2025

MO. SECRETARY OF STATE

PETITION NUMBER Referendum on HB2CONTACT PERSON Richard von GlahnMAILING ADDRESS PO Box 2187 St Louis, MO 63158TELEPHONE NUMBER 314-540-2049SUBMITTED BY (PRINT NAME) Richard von GlahnSUBMITTED BY (SIGNATURE) [Signature]DATE SUBMITTED 12/9/25

Acceptance of this petition does not constitute a determination by the Secretary of State that the petition was submitted in accordance with Chapter 116 RSMo.

COUNTY/CITY	# OF PAGES SUBMITTED AS REPORTED BY PETITIONER
Adair	88
Andrew	38
Atchison	10
Audrain	177
Barry	239
Barton	87
Bates	114
Benton	120
Bollinger	13
Boone	3,834
Buchanan	138
Butler	49
Caldwell	32

COUNTY/CITY	# OF PAGES SUBMITTED AS REPORTED BY PETITIONER
Callaway	504
Camden	223
Cape Girardeau	121
Carroll	30
Carter	7
Cass	1,543
Cedar	102
Chariton	30
Christian	746
Clark	7
Clay	1,180
Clinton	89
Cole	828
Cooper	275
Crawford	97
Dade	90
Dallas	180
Daviess	22
DeKalb	14
Dent	37
Douglas	103
Dunklin	13
Franklin	600
Gasconade	80
Gentry	19
Greene	3,067
Grundy	12

COUNTY/CITY	# OF PAGES SUBMITTED AS REPORTED BY PETITIONER
Harrison	12
Henry	151
Hickory	69
Holt	14
Howard	222
Howell	87
Iron	25
Jackson	7,375
Jasper	963
Jefferson	1,367
Johnson	628
Knox	7
Laclede	235
Lafayette	359
Lawrence	358
Lewis	15
Lincoln	475
Linn	42
Livingston	29
Macon	60
Madison	24
Maries	58
Marion	68
McDonald	125
Mercer	4
Miller	159
Mississippi	7

COUNTY/CITY	# OF PAGES SUBMITTED AS REPORTED BY PETITIONER
Moniteau	115
Monroe	50
Montgomery	104
Morgan	98
New Madrid	12
Newton	430
Nodaway	42
Oregon	9
Osage	87
Ozark	42
Pemiscot	5
Perry	29
Pettis	348
Phelps	182
Pike	60
Platte	596
Polk	306
Pulaski	295
Putnam	9
Ralls	29
Randolph	251
Ray	79
Reynolds	7
Ripley	11
St. Charles	4,102
St. Clair	62
St. Francois	148



COUNTY/CITY	# OF PAGES SUBMITTED AS REPORTED BY PETITIONER
St. Louis City	2,986
St. Louis County	9,038
Ste. Genevieve	63
Saline	176
Schuyler	5
Scotland	10
Scott	28
Shannon	27
Shelby	11
Stoddard	27
Stone	355
Sullivan	16
Taney	456
Texas	95
Vernon	123
Warren	335
Washington	59
Wayne	10
Webster	433
Worth	1
Wright	115
<b>Total Number of Pages</b>	<b>49,773</b>
<b>Total Number of Boxes</b>	<b>691</b>

People Not Politicians			
County	Number of Signatures	Number of Pages	Number of Boxes
Adair	214	88	2
Andrew	100	38	1
Atchison	48	10	1
Audrain	409	177	3
Barry	546	239	3
Barton	157	87	2
Bates	226	114	2
Benton	283	120	2
Bollinger	37	13	1
Boone	30,110	3,834	48
Buchanan	626	138	2
Butler	79	49	1
Caldwell	58	32	1
Callaway	1,430	504	7
Camden	561	223	3
Cape Girardeau	362	121	2
Carroll	84	30	1
Carter	8	7	1
Cass	9,819	1,543	20
Cedar	215	102	2
Chariton	62	30	1
Christian	3,291	746	10
Clark	7	7	1
Clay	5,688	1,180	15
Clinton	235	89	2
Cole	4,313	828	11
Cooper	751	275	4
Crawford	216	97	2
Dade	129	90	2
Dallas	282	180	3
Daviess	78	22	1
Dekalb	24	14	1
Dent	76	37	1
Douglas	185	103	2
Dunklin	17	13	1
Franklin	1,630	600	8
Gasconade	162	80	1
Gentry	84	19	1
Greene	23,547	3,067	39
Grundy	38	12	1
Harrison	19	12	1

Henry	420	151	2
Hickory	157	69	1
Holt	63	14	1
Howard	668	222	3
Howell	161	87	2
Iron	45	25	1
Jackson	59,823	7,375	93
Jasper	6,971	963	13
Jefferson	6,014	1,367	18
Johnson	2,913	628	8
Knox	10	7	1
Laclede	713	235	3
Lafayette	962	359	5
Lawrence	870	358	5
Lewis	44	15	1
Lincoln	1,287	475	6
Linn	98	42	1
Livingston	101	29	1
Macon	90	60	1
Madison	67	24	1
Maries	119	58	1
Marion	165	68	1
McDonald	285	125	2
Mercer	4	4	1
Miller	384	159	2
Mississippi	7	7	1
Moniteau	236	115	2
Monroe	75	50	1
Montgomery	165	104	2
Morgan	256	98	2
New Madrid	14	12	1
Newton	2,444	430	6
Nodaway	201	42	1
Oregon	19	9	1
Osage	167	87	2
Ozark	60	42	1
Pemiscot	5	5	1
Perry	61	29	1
Pettis	1,760	348	5
Phelps	634	182	3
Pike	102	60	1
Platte	2,492	596	8
Polk	860	306	4

Pulaski	1,483	295	4
Putnam	11	9	1
Ralls	63	29	1
Randolph	788	251	4
Ray	185	79	1
Reynolds	13	7	1
Ripley	15	11	1
Saint Charles	28,450	4,102	52
Saint Clair	106	62	1
Saint Francois	410	148	2
Saint Louis City	18,152	2,986	38
Saint Louis	71,008	9,038	113
Sainte Genevieve	200	63	1
Saline	653	176	3
Schuyler	7	5	1
Scotland	15	10	1
Scott	65	28	1
Shannon	60	27	1
Shelby	20	11	1
Stoddard	47	27	1
Stone	1,154	355	5
Sullivan	21	16	1
Taney	2,191	456	6
Texas	151	95	2
Vernon	266	123	2
Warren	810	335	5
Washington	102	59	1
Wayne	21	10	1
Webster	1,096	433	6
Worth	7	1	1
Wright	200	115	2
<b>Total:</b>	<b>305,968</b>	<b>49,773</b>	<b>691</b>

WRIT  
EXHIBIT 27

**WRIT**

**EXHIBIT 27**

Not an Official Court Document

# EXHIBIT B

Not an Official Court Document





DENNY HOSKINS, CPA

SECRETARY OF STATE  
STATE OF MISSOURI

January 5, 2026

Richard von Glahn  
9 Wilshire Terrace  
Webster Groves, MO 63119

Mr. von Glahn:

Pursuant to Section 116.100, RSMo, our office has verified the number of pages submitted for each county for the referendum petition submitted to our office on December 9, 2025. Enclosed is a copy of the reports showing how many pages were recorded per county in our petition management system.

If we can be of further assistance to you, please contact our office at (573) 751-2301.

Sincerely,

Director of Elections

Enclosure

James C. Kirkpatrick State Information Center

Elections Division • PO Box 1767 • Jefferson City, Missouri 65102 • (573) 751-2301

Administrative Rules • Business Services • Elections • Publications • Securities • State Archives • State Library • Wolfner Library

Writ Exhibits - Page 747

Petition Name: People Not Politicians

Petition Type: Referendum

LEA	Pages Scanned
Adair	64
Andrew	17
Atchison	9
Audrain	131
Barry	193
Barton	76
Bates	86
Benton	87
Bollinger	8
Boone	2,450
Buchanan	97
Butler	31
Caldwell	22
Callaway	353
Camden	148
Cape Girardeau	85
Carroll	16
Carter	5
Cass	865
Cedar	71
Chariton	25
Christian	518
Clark	5
Clay	745
Clinton	63
Cole	603
Cooper	187
Crawford	72
Dade	62
Dallas	131
Daviess	16
De Kalb	10
Dent	30
Douglas	71
Dunklin	6
Franklin	399
Gasconade	59
Gentry	11
Greene	1,994

Petition Name: People Not Politicians

Petition Type: Referendum

Grundy	7
Harrison	8
Henry	94
Hickory	52
Holt	12
Howard	139
Howell	53
Iron	17
Jackson	4,310
Jasper	878
Jefferson	897
Johnson	336
Kansas City	0
Knox	4
Laclede	182
Lafayette	208
Lawrence	265
Lewis	13
Lincoln	358
Linn	29
Livingston	22
Macon	47
Madison	15
Maries	53
Marion	57
McDonald	116
Mercer	3
Miller	106
Mississippi	7
Moniteau	80
Monroe	36
Montgomery	78
Morgan	67
New Madrid	11
Newton	372
Nodaway	30
Oregon	7
Osage	59
Ozark	29
Pemiscot	3

Petition Name: People Not Politicians

Petition Type: Referendum

Perry	22
Pettis	259
Phelps	136
Pike	48
Platte	395
Polk	216
Pulaski	238
Putnam	9
Ralls	24
Randolph	166
Ray	54
Reynolds	6
Ripley	9
Saline	122
Schuyler	2
Scotland	7
Scott	20
Shannon	22
Shelby	8
St. Charles	2,877
St. Clair	41
St. Francois	99
St. Louis	5,920
St. Louis City	1,950
Ste. Genevieve	51
Stoddard	19
Stone	269
Sullivan	14
Taney	355
Texas	71
Vernon	100
Warren	241
Washington	39
Wayne	8
Webster	291
Worth	1
Wright	78
XNTVLD	0
<b>Total Pages Scanned</b>	<b>33,068</b>

Petition Name: Invalid Date - People Not Poli

Petition Type: Referendum

LEA	Pages Scanned
Adair	24
Andrew	21
Atchison	1
Audrain	46
Barry	46
Barton	11
Bates	28
Benton	33
Bollinger	5
Boone	1,384
Buchanan	41
Butler	18
Caldwell	10
Callaway	151
Camden	75
Cape Girardeau	36
Carroll	14
Carter	2
Cass	678
Cedar	31
Chariton	5
Christian	228
Clark	2
Clay	436
Clinton	26
Cole	225
Cooper	88
Crawford	25
Dade	28
Dallas	49
Daviess	6
De Kalb	4
Dent	7
Douglas	32
Dunklin	7
Franklin	201
Gasconade	21
Gentry	8
Greene	1,073

Petition Name: Invalid Date - People Not Poli

Petition Type: Referendum

Grundy	5
Harrison	4
Henry	57
Hickory	17
Holt	2
Howard	83
Howell	34
Iron	8
Jackson	3,063
Jasper	85
Jefferson	470
Johnson	291
Kansas City	0
Knox	3
Laclede	53
Lafayette	151
Lawrence	93
Lewis	2
Lincoln	116
Linn	13
Livingston	7
Macon	13
Madison	9
Maries	5
Marion	11
McDonald	9
Mercer	1
Miller	53
Mississippi	0
Moniteau	34
Monroe	14
Montgomery	26
Morgan	31
New Madrid	1
Newton	58
Nodaway	12
Oregon	2
Osage	28
Ozark	13
Pemiscot	2



Petition Name: Invalid Date - People Not Poli

Petition Type: Referendum

Perry	7
Pettis	89
Phelps	46
Pike	12
Platte	201
Polk	90
Pulaski	57
Putnam	0
Ralls	5
Randolph	85
Ray	25
Reynolds	1
Ripley	2
Saline	54
Schuyler	3
Scotland	3
Scott	8
Shannon	5
Shelby	3
St. Charles	1,225
St. Clair	21
St. Francois	49
St. Louis	3,113
St. Louis City	1,035
Ste. Genevieve	12
Stoddard	8
Stone	86
Sullivan	2
Taney	101
Texas	24
Vernon	23
Warren	94
Washington	20
Wayne	2
Webster	142
Worth	0
Wright	37
XNTVLD	0
<b>Total Pages Scanned</b>	<b>16,695</b>

WRIT  
EXHIBIT 28

**WRIT  
EXHIBIT 28**



----- Forwarded message -----

From: **Petitions** <[Petitions@sos.mo.gov](mailto:Petitions@sos.mo.gov)>

Date: Mon, Jan 5, 2026 at 12:50 PM

Subject: RE: Page Counts Received - Referendum Petition 2026-R004

To: [richard@peoplenotpoliticiansmo.org](mailto:richard@peoplenotpoliticiansmo.org) <[richard@peoplenotpoliticiansmo.org](mailto:richard@peoplenotpoliticiansmo.org)>

Cc: Petitions <[Petitions@sos.mo.gov](mailto:Petitions@sos.mo.gov)>, Elections-1 <[Elections-1@sos.mo.gov](mailto:Elections-1@sos.mo.gov)>

Good afternoon,

Below is the information provided to the prep team regarding valid versus invalid dates.

Additionally for reference, after the prep team completed the separation, the scanning team scanned the pages by county, organizing them into separate valid and invalid petitions. Valid date pages (Petition Name: People Not Politicians) have already been sent to the LEA's for verification of signatures. Invalid dates (Petition Name: Invalid Date – People Not Poli) will be processed internally by elections staff and other trained SOS employees. Thank you!

*SOS staff will separate signatures pages that have signatures dated from September 12, 2025 (9/12/2025) - October 13, 2025 (10/13/2025). These will be in separate folders and placed in separate boxes and scanned in separately for processing. If the page has one or more signatures with a valid date – the whole page is sent for scanning into the valid date petition for distribution to the local election authorities to verify signatures.*

**Chrissy Peters**

**Director of Elections**

Office of the Missouri Secretary of State Denny Hoskins  
Kirkpatrick State Information Center  
600 W. Main St., Jefferson City, MO 65101

[Chrissy.Peters@sos.mo.gov](mailto:Chrissy.Peters@sos.mo.gov)

Office Phone: (573) 751-2301



## CONFIDENTIALITY STATEMENT

This electronic communication is from the Office of the Missouri Secretary of State and is confidential, privileged, and intended only for the use of the recipient named above. If you are not the intended recipient or the employee or agent responsible for delivering this information to the intended recipient, unauthorized disclosure, copying, distribution, or use of the contents of this transmission is strictly prohibited. If you have received this message in error, please reply to the sender immediately. Thank you.

**From:** Richard von Glahn <[richard@peoplenotpoliticiansmo.org](mailto:richard@peoplenotpoliticiansmo.org)>

**Sent:** Monday, January 5, 2026 10:44 AM

**To:** Elections-1 <[Elections-1@sos.mo.gov](mailto:Elections-1@sos.mo.gov)>

**Subject:** Re: Page Counts Received - Referendum Petition 2026-R004

**CAUTION:** This email originated from OUTSIDE of the SOS organization. Do not click on links or open attachments unless you are expecting the email and know that the content is safe. If you believe this to be a malicious or phishing email, please use Phish Alert to report it.

Thank you.

Can you provide me the exact criteria that was used to determine a page to be invalid by date?

Richard von Glahn

On Mon, Jan 5, 2026 at 10:25 AM Elections-1 <[Elections-1@sos.mo.gov](mailto:Elections-1@sos.mo.gov)> wrote:

Mr. von Glahn:

Please find attached information regarding the counts of pages received for your referendum as verified by our petition management system. Please feel free to contact our office with any questions you may have.

**Elections Division**

Office of the Missouri Secretary of State Denny Hoskins

Kirkpatrick State Information Center

600 West Main Street, Jefferson City, MO 65101

[elections@sos.mo.gov](mailto:elections@sos.mo.gov)

Office Phone: 573-751-2301 / 1-800-669-8683



**CONFIDENTIALITY STATEMENT**

This electronic communication is from the Office of Missouri Secretary of State and is confidential, privileged and intended only for the use of the recipient named above. If you are not the intended recipient or the employee or agent responsible for delivering this information to the intended recipient, unauthorized disclosure, copying, distribution or use of the contents of this transmission is strictly prohibited. If you have received this message in error, please reply to the sender immediately. Thank you.

--

*Paid for by People Not Politicians, Mike Pridmore, Treasurer*



Court Document Not an Official Court Document Not an Official Court Document Not an O

--

*Paid for by People Not Politicians, Mike Pridmore, Treasurer* Not an Official Court Document

Not an Official Court Document Not an Official Court Document Not an Official Court Do  
Document Not an Official Court Document Not an Official Court Document Not an Official  
al Court Document Not an Official Court Document Not an Official Court Document Not an  
an Official Court Document Not an Official Court Document Not an Official Court Document  
nt Not an Official Court Document Not an Official Court Document Not an Official Court D  
t Document Not an Official Court Document Not an Official Court Document Not an Official  
cial Court Document Not an Official Court Document Not an Official Court Document Not  
ot an Official Court Document Not an Official Court Document Not an Official Court Docume  
ent Not an Official Court Document Not an Official Court Document Not an Official Court  
ut Document Not an Official Court Document Not an Official Court Document Not an Offic  
ficial Court Document Not an Official Court Document Not an Official Court Document Not  
ot an Official Court Document Not an Official Court Document Not an Official Court Docume  
ment Not an Official Court Document Not an Official Court Document Not an Official Cou  
urt Document Not an Official Court Document Not an Official Court Document Not an Offi  
fficial Court Document Not an Official Court Document Not an Official Court Document N  
Not an Official Court Document Not an Official Court Document Not an Official Court Docu

WRIT  
EXHIBIT 29

**WRIT  
EXHIBIT 29**

**IN THE CIRCUIT COURT OF COLE COUNTY, MISSOURI**

PEOPLE NOT POLITICIANS, *et al.*, )

Plaintiffs, )

v. )

Case No. 25AC-CCo7128

MISSOURI SECRETARY OF STATE, )

DENNY HOSKINS, )

Defendant. )

**MOTION TO END ABEYANCE AND RENDER JUDGMENT**

Plaintiffs move the Court to cease holding this case in abeyance and render judgment for one party or the other within 14 days. The Court's December 12, 2025 decision to hold this case in abeyance and its subsequent decisions to continue holding the case in abeyance are erroneous.

This case was, and is, ripe for adjudication. All facts necessary to resolve Plaintiffs' claims are fully developed (indeed, the parties stipulated to them).

And, all else aside, the Secretary's violation of his statutory duty to send all signatures to the local election authorities for processing is an immediate, concrete dispute. Further, denying relief is creating hardship for Plaintiffs and the hundreds of thousands of Missourians whose interests they represent. *See Graves v. Mo. Dep't of Corr., Div. of Probation & Parole*, 630 S.W.3d 769, 773 (Mo. banc 2021). The longer the Court continues to hold this case in abeyance, the more dire such prejudice will become. As explained below, withholding relief now creates substantial risk of this case running into Missouri's statutory

deadline for altering ballots, as well as risk that Defendants will argue it is too late to make such changes even if statutorily permitted. § 115.125, RSMo (“No court shall have the authority to order an individual or issue be placed on the ballot less than eight weeks before the date of the election.”).

And, *even if* this case were not ripe (which it is), the proper course would not be to hold it in abeyance. Rather, it would be to dismiss the case for lack of a justiciable controversy. Such order would be immediately appealable. If the Court believes the case is not ripe, it should dismiss the case so Plaintiffs can appeal and ask the Court of Appeals to consider that issue and—if it concludes the matter is ripe—proceed to address the straightforward legal merits of this case.

The Court’s original abeyance order indicates the Court is holding the case in abeyance not for want of a ripe controversy, but rather because future events “could . . . moot[] the issues presented.” 12/12/2025 Order. But virtually any case can be rendered moot by the passage of time. This case is not presently moot, so there is a justiciable controversy the Court should resolve. Plaintiffs are aware of no authority authorizing a trial court to hold a case in abeyance based on the possibility that it may eventually become moot.

In sum, there is a justiciable controversy. This matter was fully tried more nearly three months ago. All that remains is for the Court to render judgment (whether on the merits or for want of a justiciable controversy) so the aggrieved party can appeal. Continuing to hold this case in abeyance is prejudicial and an abuse of discretion. Plaintiffs request that the Court promptly render a decision.

## BACKGROUND

### A. Plaintiffs File Suit and Seek Prompt Trial Setting

Plaintiffs initially filed suit on September 18, 2025. They sought declaratory relief concerning the Secretary's violation of the sunshine law and rejection of Plaintiffs' referendum petitions for circulation due to the lack of the Governor's signature.

Plaintiffs amended their petition on September 29. Count I challenges the Secretary's refusal to approve Plaintiffs' original referendum petition on the basis that the Governor had not yet signed HB1. Count II seeks a declaration that the Secretary is not authorized to reject signatures solely because they were gathered before the referendum had been approved as to form. Plaintiffs did not ask this Court to assess the validity of any signatures.

On October 14, the Secretary answered. On October 15, Judge Green set the case for trial on October 28. On October 28, the parties filed joint stipulations and appeared for trial. Because Judge Green was ill, the trial was continued to November 13.<sup>1</sup>

---

<sup>1</sup> As of October 28, Intervenor Put Missouri First did not legally exist. See <https://mec.mo.gov/Scanned/PDF/2025/173449.pdf>. The only reason Put Missouri First was able to intervene in this case at all was due to Judge Green being ill on the originally scheduled trial date.

B. Put Missouri First Is Improperly Allowed to Intervene and Delay Trial

On November 12, Put Missouri First moved to intervene. On November 13, the parties appeared for trial. But, after Put Missouri First was granted intervention, it promptly took a change of judge and then served discovery. The case was immediately reassigned to Judge Walker, who set the case for trial on November 21. Then, the Secretary requested a change of judge, and the case was again reassigned. The Court set the matter for trial on December 8.

C. Plaintiffs Seek Relief from the Court of Appeals

On December 8, Plaintiffs sought a writ of prohibition from the Court of Appeals concerning the decisions to allow intervention and require Plaintiffs to respond to discovery. On December 9, Intervenor moved for sanctions (including striking Plaintiffs' claims) in connection with certain discovery disputes. After ordering Intervenor to respond to the writ petition (and address both the propriety of intervention and its discovery requests), the Court of Appeals issued an order on December 22, 2025 staying the writ petition while retaining jurisdiction and directing the parties to advise it "when and if the underlying litigation resumed."<sup>2</sup>

---

<sup>2</sup> The Court of Appeals subsequently issued its decision in another election-related case making clear that it was error to allow Put Missouri First to Intervene here. *See Toder v. Hoskins*, No. WD88585, at 9-11 (concluding trial court abused its discretion by allowing someone politically opposed to a ballot measure to intervene).



D. This Court Places the Matter in Abeyance

Meanwhile, this Court held a bench trial on December 8, 2025. The parties submitted proposed judgments on December 10. All parties requested that the Court render a decision. Plaintiffs requested entry of judgment in their favor.

**Exhibit A.** The Secretary and Intervenor both asked the Court to dismiss for lack of a justiciable controversy or, alternatively, for judgment on the merits.

**Exhibits B-C.**<sup>3</sup> No one asked the Court to hold the matter in abeyance.

On December 12, the Court entered an order holding the case in abeyance “until the requisite number of signatures have been certified or up until enough signatures have been rejected so as to prevent plaintiffs’ referendum from appearing on the ballot.” 12/12/2025 Order.

E. Plaintiffs Request a Final Judgment

On January 5, 2026, Plaintiffs submitted a memorandum concerning the status of signature verification efforts. As Plaintiffs explained—with documentary support—the Secretary deemed 16,695 pages of signatures to be invalid and refused to submit them to local election authorities for further validation on the basis that the signatures were gathered before the Secretary’s approval as to form. 1/5/2026 Memo. & Exhibits.<sup>4</sup>

---

<sup>3</sup> Previously, the Secretary and Intervenor had filed motions to dismiss, arguing the Court should dismiss the case, not hold it in abeyance.

<sup>4</sup> Plaintiffs and the Secretary agree that Plaintiffs gathered approximately 100,800 signatures before October 14, 2025. Oct. 28. 2025 Jt. Stips. ¶¶ 29, 32.

On January 12, 2026, Plaintiffs and the Secretary submitted briefs on the status of the case. Plaintiffs advised the Court this matter was undoubtedly ripe after the Secretary deemed numerous signatures invalid (the very thing Plaintiffs seek a declaration he cannot do), and was “ready for a final judgment.” Pls. 1/12/2026 Supp. Brief. The Secretary argued the Court properly decided to hold the case in abeyance because “this case remains **unripe**.” Ds. 1/12/2026 Status Hearing Brief at 4 (emphasis added). He contended the Court should either continue to hold the case in abeyance or dismiss it. *Id.* The Court elected to continue holding the case in abeyance and set a status conference for February 17.

On February 17, the parties appeared for another status conference. During that conference, Plaintiffs asked the Court to render a judgment for one party or the other. Plaintiffs advised that if the Court believed the case was not ripe, then it should dismiss in response to the Secretary’s motion to dismiss. Instead, the Court again elected to continue holding the matter in abeyance and set the case for a further status conference on March 17.

F. The Secretary and Intervenor Are Already Arguing it is Too Late to Effectuate the Referendum

While this case has been held in abeyance, several other cases related to HB1 and the referendum have been working their way through the court system. As this Court is aware, *Luther v. Hoskins* challenges the enactment of HB1 in the first place. That case is currently with the Missouri Supreme Court and is

scheduled for oral argument on March 10. This argument date was set after all parties *agreed* resolution was time-sensitive and the Supreme Court entered an expedited briefing schedule.

Yet, on February 9, the Secretary filed his respondent's brief, in which he argued the Court should adopt the so-called "*Purcell* Principle" and conclude it is *already* too close to the election to order the Secretary to require this year's congressional election to be held under the 2022 congressional map. *See Luther v. Hoskins*, No. SC101412, 2/9/2026 Resp. Br. at 54-59. According to the Secretary, any "judicial order to implement a new congressional map for those elections would cause chaos." *Id.* at 54. He is wrong about that, but the fact that he is making such an argument **in February** illustrates why it is an abuse of discretion for this Court to refuse to resolve the dispute in this case until the Secretary decides to finish validating some of the signatures Plaintiffs submitted.

Another case concerning the referendum is *Maggard v. State*, which asks this Court to decide whether People Not Politicians' submission of signatures suspended the effectiveness of HB1. That case was tried before Judge Stumpe on February 10. Put Missouri First was also allowed to intervene there. And, on February 9, Put Missouri First filed a trial brief similarly arguing that—under the "*Purcell* Principle"—this Court should refuse to conclude the submission of the referendum suspended HB1. *See Maggard v. State*, No. 25AC-CC09120, Intervenor Tr. Br. at 17-21. Again, Intervenor's willingness to make such

arguments at this early juncture illustrates the problem with holding this case in abeyance.<sup>5</sup>

#### G. Status of Signatures

The Secretary decided to send *some* of the signatures Plaintiffs submitted to local election authorities for validation of individual signatures (i.e., not by random sampling). By law, the local election authorities have until July 27, 2026 to complete that process. § 116.130.2, RSMo. The Secretary, however, has until at least August 4, 2026 to issue a certificate of sufficiency or insufficiency. § 116.150.3, RSMo. He may have until as late as August 10, depending on when the local election authorities complete their work. *Id.* By law, no changes can be made to ballots after September 8, 2026. § 115.125.3, RSMo.

Through open records requests, Plaintiffs have obtained information the local election authorities have provided to the Secretary reflecting that Plaintiffs' referendum will qualify for the ballot. A copy of the underlying data is attached hereto as **Exhibit D**. Based on the latest data, the local election authorities have validated vastly more signatures than necessary for qualification in five congressional districts. And the referendum will clear the signature threshold in

---

<sup>5</sup> The State and Missouri Republican State Committee have likewise raised *Purcell* as a barrier to relief in several cases concerning HB1 pending in Jackson County. *See Wise v. State*, No. 2516-CV29597, 2/11/2026 State Tr. Br. at 47-52; *Healey v. State*, No. 2516-CV31273, 2/11/2026 Intervenor Tr. Br. at 29-33.

Congressional District 7 when counting is complete. The following chart summarizes the data:

CD	Valid Sigs Needed	Total number of valid signatures (so far)	Sigs not yet verified (only calculated for CDs not yet at 100%)	Progress to Certification
1	15,990	24,711		158%
2	21,570	28,454		132%
3	20,062	27,795		139%
4	18,544	22,640		122%
5	16,700	24,025		144%
7	18,599	18,124	7.5K	97%

Yet, the Secretary claims this data is merely “preliminary” and he intends to take some unknown amount of time for “quality control and review.”<sup>6</sup>

He previously “promised a ‘slow and steady’ review of signatures.”<sup>7</sup> He stated that the local election authorities have until July 28 to complete their work and “he isn’t likely to determine the measure’s constitutionality until that’s done.”<sup>8</sup> He promised: “I’m going to do everything I can to protect Gov. (Mike) Kehoe’s Missouri First Map.”<sup>9</sup> And the Attorney General, who—of course—represents the Secretary in this case, agrees with this strategy. During an interview in January, after the Court held this case in abeyance, Attorney General

<sup>6</sup> [Mo. redistricting referendum backers push Sec. of State](#)

<sup>7</sup> [Opponents of Trump-backed redistricting in Missouri submit a petition to force a public vote | PBS News](#)

<sup>8</sup> *Id.*

<sup>9</sup> *Id.*



Hanaway asserted: “As long as the status quo is the new maps, delay works in our favor.”<sup>10</sup>

## ARGUMENT

### I. This Case Is Ripe for Adjudication

#### A. Ripeness Standards

The Secretary has contended the Court should continue holding the case in abeyance (or dismiss it) because it is not ripe. “[T]he question of ripeness turns on whether the facts are sufficiently developed to permit a conclusive adjudication of the issue presented.” *Newman v. City of Warsaw*, 129 S.W.3d 474, 478 (Mo. App. 2004). Courts “employ[] a two-fold test in ascertaining whether a controversy is ripe for judicial determination: (1) whether the issues presented are fit for judicial resolution, and (2) whether denying relief would create hardship for either party.” *Graves*, 630 S.W.3d at 773. Fitness for judicial resolution turns on whether the “dispute is developed sufficiently to allow the court to make an accurate determination of the facts, to resolve a conflict that is presently existing, and to grant specific relief of a conclusive character.” *Id.* (quotations omitted). Here, all these standards lead to but one conclusion: there is a ripe controversy.

---

<sup>10</sup> [Is Missouri GOP delaying redistricting before election? | Kansas City Star](#) (emphasis added); [see also Missouri Attorney General, Catherine Hanaway - Live at the Capitol - NewsTalkSTL - Omny.fm](#)



B. No Further Factual Development is Needed

This case presents two straightforward legal questions: (1) whether the lack of the Governor's signature on a bill is a "matter of form" that allows the Secretary to reject a referendum petition and (2) whether signatures on a referendum petition can be rejected solely on the basis that they were gathered before the Secretary's approval of the referendum as to form. These are not difficult questions. Indeed, controlling case law conclusively answers both.

As to the first question, "the secretary of state's authority to review a referendum petition sample sheet for sufficiency as to form does not extend to substantive matters including, without limitation, determining compliance with the Missouri Constitution." *ACLU v. Ashcroft*, 577 S.W.3d 881, 892 (Mo. App. 2019). Review of a referendum petition for compliance with the Constitution may occur only after signatures have been submitted. *Id.* The Secretary's conclusion (in September 2025) that Plaintiffs were not permitted to initiate a referendum on a bill that had not been signed by the Governor is a matter of substance, not form. It was clear error for the Secretary to reject Plaintiffs' original referendum petition sample sheets (which were *identical* to the one the Secretary later approved) on that basis.

As to the second question, nothing in the Constitution requires approval as to form for signatures to be considered valid. Nothing in the statutes requires this either. Section 116.332.1 merely requires that a referendum sample sheet be

*submitted* to the Secretary before circulation. It says nothing about requiring approval as to form before signatures may be gathered.

While Sections 116.180 and 116.334 *did* contain such a requirement, the Supreme Court invalidated it as an unconstitutional interference with the people's right to the referendum. *No Bans on Choice v. Ashcroft*, 638 S.W.3d 484, 492 (Mo. banc 2022). And it has been nearly a decade since the Supreme Court held that signatures were not invalid simply because the petition did not include the *statutorily* required ballot title (due to its revision by the courts). *Boeving v. Kander*, 496 S.W.3d 498, 505 (Mo. banc 2016).

The law is clear. So, the only question is whether the Court has before it sufficient facts to permit application of that law to this dispute. It does. The parties stipulated to all relevant facts. The Court has HB1, the sample sheets, and the Secretary's written decisions. The parties stipulated to all relevant dates concerning Plaintiffs' submissions and the Secretary's decisions. Nothing else is needed to apply clear, binding Missouri case law and invalidate the Secretary's unlawful decisions.

C. There Is a Presently Existing Controversy the Court Can Conclusively Resolve

There is also present controversy between Plaintiffs and the Secretary, and the Court can resolve that controversy and "grant specific relief of a conclusive character." *Graves*, 630 S.W.3d at 773. With respect to Count I, the Secretary undeniably rejected Plaintiffs' original sample sheets based on an issue of

substance, not form, on September 28, 2025. Plaintiffs are presently being harmed by that erroneous decision because it forms the entire basis for the Secretary's decision to deem invalid tens of thousands of signatures gathered before October 14, 2025. See 1/5/2026 Memo. & Exhibits.

There is likewise a presently existing controversy as to Count II. At the time of trial, the Secretary had made clear he would not consider any signatures gathered prior to October 15, 2025 to be valid. 12/3/2025 Am. Jt. Stips. ¶ 29. He also had issued public statements designed to dissuade signature gathering, claiming that gathering signatures before approval as to form was a crime. Jt. Ex. 14. This gave rise to a real, legitimate, resolvable controversy.

But, even if it hadn't, there has undoubtedly been a controversy between the parties since early January, when the Secretary made clear he would not send nearly 17,000 pages of signature pages to local election authorities for validation because they were gathered before his approval as to form. 1/5/2026 Memo. & Exhibits. As Plaintiffs previously explained, the Secretary is statutorily obligated to send all signature pages to local election authorities for validation. Where, as here, the Secretary elects to have local election authorities individually validate signatures, "[c]opies of all pages from not less than one petition shall be received in the office of the election authority not later than two weeks after the petition is filed in the office of the secretary of state." § 116.130.1(1), RSMo. The Secretary is actively violating this statute. There is a ripe dispute.

And the Court can conclusively resolve these disputes. It can order the Secretary to comply with the law and send all signatures Plaintiffs submitted to local election authorities for validation. Contrary to Defendants' suggestions, Plaintiffs are not asking the Court to conclude that any particular signature is valid. They are simply asking the Court to require the Secretary to comply with his statutory obligations and to refrain from deeming swaths of signatures invalid based on the date they were collected. It will remain for the local election authorities to further validate those signatures.

As explained below, withholding relief on this matter is causing significant prejudice to Plaintiffs. And the fact that the passage of time may render this dispute moot is not a valid basis to hold the case in abeyance. Beyond that, however, hypothetical future developments are also legally irrelevant to whether there is a ripe dispute *right now*. There is, for all the reasons discussed.

D. Withholding Relief Is Causing, and Will Continue to Cause, Hardship for Plaintiffs

The second prong of the ripeness inquiry asks “whether denying relief would create hardship for either party.” *Graves*, 630 S.W.3d at 773. Here, the answer to that question is unequivocally “yes.”

Resolution of this case is of critical importance to Plaintiffs, all Missourians, and the integrity of the State’s election processes. Plaintiffs have, from day one, attempted to obtain swift resolution, so that all signatures gathered can be validated. The case should have been tried in November but was delayed

due to the erroneous decision to allow a political action committee formed *after* the original trial date to intervene, take a change of judge, and serve irrelevant discovery. This is the type of oppressive intervention the Court of Appeals condemned in *Toder and Prentzler v. Carnahan*, 366 S.W.3d 557 (Mo. App. 2012).

Now, resolution of the case is being further delayed by the Court's decision to hold the matter in abeyance. All three parties asked the Court to render a decision (either on justiciability grounds or the merits). *See* Exs. A-C. That is what the Court should do.

As explained above, the Secretary and Attorney General have made clear they intend to delay issuing a decision on Plaintiffs' signatures for as long as possible (because "delay works in [their] favor"). Under the statutory timelines, that decision could come as late as August. As Plaintiffs have explained, however, there are tens of thousands of signatures the Secretary has not sent out for validation. While information provided by the local election authorities reflects that Plaintiffs will have more than enough signature to qualify, the Secretary may take a different view. If the Secretary issues a certificate of insufficiency due to an insufficient number of valid signatures (or on some other ground) in August, the Court will *then* have to decide the questions tried back in December. Even assuming the Court promptly rules for Plaintiffs (which it should, under the clear holdings in *ACLU* and *No Bans on Choice*), the Secretary will then have to undertake validation of tens of thousands of additional signatures.



And delaying validation will likely cause problems even if the Secretary issues a certificate of *sufficiency*. Any citizen can challenge the validity of signatures. See § 116.200, RSMo. Such a challenge is likely to occur here. When it does, these tens of thousands of signatures will come into play. For any number of signatures that are challenged, People Not Politicians will seek to prove additional signatures are valid. Having to first ask the local election authorities review these tens of thousands of signatures before any litigation moves forward will hold up the process and make it harder to swiftly resolve any signature challenge.

Given that the statutory deadline for altering ballots is September 8, there is substantial risk that this additional counting cannot be completed before the deadline arrives. Or, if the Court rules *against* Plaintiffs at that juncture, Plaintiffs will then have to take an appeal and, if successful, return to this Court for further proceedings regarding validation of additional signatures. All of these possibilities are highly untenable and counsel in favor of deciding this ripe controversy now.<sup>11</sup>

There is more. As explained above, the Secretary and Intervenor are already telling courts it is too late to require use of the 2022 congressional map

---

<sup>11</sup> The Supreme Court has expressed concern with the Secretary delaying decisions in a way that threatens the ability of the courts to carefully consider election cases. *Coleman v. Ashcroft*, 696 S.W.3d 347, 353 (Mo. banc 2024). Lower courts should not add to these complications by holding time-sensitive cases in abeyance.



under the “*Purcell* Principle.” While Plaintiffs believe that is wrong, and that the appellate courts will agree, allowing this dispute to simmer until August or later creates risk that Defendants will successfully invoke that principle, even if ballots can be altered in compliance with Section 115.125.

For all of these reasons, withholding relief works severe hardship on Plaintiffs. *Graves*, 630 S.W.3d at 773. All such hardship can be avoided by simply deciding the case, as all parties requested the Court to do.

E. No One Asked the Court to Hold the Case in Abeyance

Finally, Plaintiffs wish to emphasize that before entry of the Court’s December 12 Order, all three parties requested a dispositive ruling on the issues raised. *See* Exs. A-C. No one asked the Court to hold the case in abeyance. Even now, the Secretary has argued the case is not ripe and should be dismissed. As discussed in the next section, dismissal is the outcome Missouri law mandates if the Court thinks the case is not ripe.

There is little Missouri case law discussing the power of a trial court to hold a case in abeyance. There is no rule of procedure authorizing an open-ended, indefinite abeyance of proceedings. The case law Plaintiffs can locate regarding abeyances is limited to narrow circumstances involving appellate remands and partial verdicts in the trial court. *See, e.g., G & S Masonry, Inc. v. MJC Constructors, Inc.*, 164 S.W.3d 530, 533 (Mo. App. 2005); *State v. Anderson*, 580 S.W.2d 553, 554 (Mo. App. 1979); *Brickner v. Normandy Osteopathic Hosp., Inc.*, 687 S.W.2d 910, 913-14 (Mo. App. 1985).

Assuming, however, the Court has inherent, discretionary authority to place a case in abeyance to control its docket, doing so here is an abuse of discretion. For all the reasons discussed above, it is against the logic of the circumstances, unreasonable, arbitrary, and shocks the sense of justice to hold a time-sensitive election case in an unappealable state of abeyance, when all parties have previously asked the Court to render a decision. *See Hanshaw v. Crown Equip. Corp.*, 2026 WL 512824, at \*2 n.2 (Mo. banc Feb. 24, 2026) (discussing abuse of discretion standard).

## **II. If The Case Is Not Ripe, The Court Must Dismiss It**

For the reasons discussed, this case is ripe. But if the Court disagrees, the proper thing to do is to dismiss the case, not hold it in abeyance. Refusing to dismiss the case—so that Plaintiffs can seek appellate review—is improper.

“Prior to addressing the merits of a case, a court must determine whether a case meets the requirements for a justiciable controversy.” *Mo. State Conf. of Nat’l Ass’n for the Advancement of Colored People v. State*, 633 S.W.3d 843, 848 (Mo. App. 2021). Standing is an element of justiciability. *Id.* If a “matter is not ripe for adjudication, the trial court should dismiss the matter without prejudice.” *Bettis v. Potosi R-III Sch. Dist.*, 51 S.W.3d 183, 189 (Mo. App. 2001) (remanding case and “direct[ing] the trial court to dismiss the [plaintiff’s] claim” if it concluded the claim was not ripe).

Stated differently, if there is no justiciable controversy, there is nothing for the Court to do but dismiss. There is no reason for the Court to hold the case in

abeyance based on the possibility that the case may eventually “become ripe.” This is so for a number of reasons.

Among other things, Plaintiffs believe this case is ripe and dismissing the case without prejudice will enable Plaintiffs to seek immediate review. “Where . . . the effect of the dismissal is to resolve plaintiff’s claim and not merely the pleading of that claim, the judgment entered is final and appealable.” *State ex rel. Henderson v. Asel*, 566 S.W.3d 596, 600 n.6 (Mo. banc 2019) (quotations omitted). Courts routinely entertain appeals regarding dismissals on ripeness grounds. *See, e.g., Claymont Dev., LLC v. City of Wildwood*, 718 S.W.3d 430, 432 (Mo. App. 2025) (considering and reversing dismissal on ripeness grounds); *Newman*, 129 S.W.3d at 480 (same); *Strack Excavating, LLC v. Mo. Dep’t of Nat. Res., Land Reclamation Comm’n*, 459 S.W.3d 439, 443 (Mo. App. 2015) (considering and affirming dismissal on ripeness grounds).

For the reasons discussed above in Section I.D, the Court’s refusal to render judgment is prejudicing Plaintiffs. The appellate courts have previously had to redress comparable issues. In *Henderson*, the trial court entered an order dismissing the plaintiff’s claims for lack of jurisdiction. 566 S.W.3d at 598. But the trial court did not denominate its order as a judgment. *Id.* When the trial court refused to do so, the plaintiff appealed. *Id.* The Supreme Court dismissed the appeal for lack of jurisdiction. *Id.* When the trial court again refused to enter an appealable judgment, the Supreme Court was forced to issue a writ of mandamus compelling the trial court to do so. *Id.* at 599-600.

Plaintiffs would prefer to avoid having to pursue such recourse here. But, for all the reasons discussed herein, the Court's refusal to render judgment is causing extreme hardship to Plaintiffs and threatens to deprive them of any remedy whatsoever. Plaintiffs respectfully request that—if the Court believes this matter is not ripe—it enter an order dismissing this case for lack of a justiciable controversy so that Plaintiffs can seek appellate review.

### **III. The Fact That This Case Might Become Moot at Some Point Does Not Authorize the Court to Refuse to Decide a Live Controversy**

As noted, the Secretary has argued the Court should continue the state of abeyance because the case is not ripe. The Court's December 12 Order, however, indicates the case is being held in abeyance because the Secretary might eventually validate enough signatures gathered after October 14, 2025 to "moot[] the issues presented in the case at bar." 12/12/2025 Order. This is not a basis to hold the case in abeyance.

Nearly any case *could* be rendered moot by the passage of time. That fact does not counsel in favor of the Court refusing to act. To the contrary, the ravages of mootness counsel in favor of dispensing swift, meaningful relief. That is particularly true here because—for all the reasons discussed above—the passage of time threatens to work a grave injustice on Plaintiffs and the hundreds of thousands of Missourians who signed the referendum.

Perhaps this dispute would be mooted if the Secretary certifies enough valid signatures. But probably not. The issues presented here are (i) of general

public interest, (ii) will recur, and (iii) and will likely continue to evade review in live cases (particularly if cases are to be held in abeyance while the controversy is live). *See Asher v. Carnahan*, 268 S.W.3d 427, 431 (Mo. App. 2008) (discussing exception to mootness doctrine). This is the second time in the last several years the Secretary's pre-circulation review activities have interfered with signature-gathering efforts. *See No Bans on Choice*, 638 S.W.3d 484. The Supreme Court reviewed that issue in 2022 after finding the dispute was "squarely within the mootness exception of 'capable of repetition, yet evading review.'" *Id.* at 489 n.9. Waiting is unlikely to moot this dispute.

And even if it might, Plaintiffs are aware of no authority supporting an abeyance based on the possibility that a case might become moot. Here, the countervailing considerations (discussed at length above) vastly outweigh whatever judicial efficiency/restraint considerations might arguably support abeyance.

## CONCLUSION

For the foregoing reasons, Plaintiffs respectfully request that the Court end the abeyance in this matter and enter a judgment by March 20, 2026.



Respectfully Submitted,

**STINSON LLP**

/s/ Alexander C. Barrett

Charles W. Hatfield, MO No. 40363  
Alixandra S. Cossette, MO No. 68114  
Alexander C. Barrett, MO No. 68695  
Greta M. Bax, MO No. 73354  
230 W. McCarty Street  
Jefferson City, Missouri 65101  
Phone: (573) 636-6263  
Facsimile: (573) 636-6231  
[chuck.hatfield@stinson.com](mailto:chuck.hatfield@stinson.com)  
[alix.cossette@stinson.com](mailto:alix.cossette@stinson.com)  
[alexander.barrett@stinson.com](mailto:alexander.barrett@stinson.com)  
[greta.bax@stinson.com](mailto:greta.bax@stinson.com)

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was filed electronically via the Missouri Case.net e-filing system, which notified all counsel of record on this 6th day of March, 2026.

/s/Alexander C. Barrett

*Attorney for Plaintiffs*



Court Document Not an Official Court Document Not an Official Court Document Not an O  
Official Court Document Not an Official Court Document Not an Official Court Document  
t Not an Official Court Document Not an Official Court Document Not an Official Court Do  
Document Not an Official Court Document Not an Official Court Document Not an Official  
al Court Document Not an Official Court Document Not an Official Court Document Not an  
an Official Court Document Not an Official Court Document Not an Official Court Document  
nt Not an Official Court Document Not an Official Court Document Not an Official Court D  
t Document Not an Official Court Document Not an Official Court Document Not an Official  
cial Court Document Not an Official Court Document Not an Official Court Document Not  
ot an Official Court Document Not an Official Court Document Not an Official Court Documen  
ent Not an Official Court Document Not an Official Court Document Not an Official Court  
ut Document Not an Official Court Document Not an Official Court Document Not an Offic  
ficial Court Document Not an Official Court Document Not an Official Court Document Not  
ot an Official Court Document Not an Official Court Document Not an Official Court Docume  
ment Not an Official Court Document Not an Official Court Document Not an Official Cou  
urt Document Not an Official Court Document Not an Official Court Document Not an Offi  
Official Court Document Not an Official Court Document Not an Official Court Document N  
Not an Official Court Document Not an Official Court Document Not an Official Court Docu

# WRIT EXHIBIT 30

IN THE CIRCUIT COURT OF COLE COUNTY

STATE OF MISSOURI

PEOPLE NOT POLITICIANS, et al.,

Plaintiffs,

vs.

MISSOURI SECRETARY OF STATE  
DENNY HOSKINS,

Defendant.

Case No: 25AC-CCo7128

**PROPOSED [FINAL JUDGMENT]**

All parties appeared before this Court on December 8, 2025, for a bench trial. Plaintiffs People Not Politicians and Richard von Glahn were represented by Chuck Hatfield and Greta Bax of Stinson LLP. Defendant Missouri Secretary of State Denny Hoskins was represented by Principal Deputy Solicitor General Bill Seidleck of the Missouri Attorney General's Office and Jacqueline Bryant of the Secretary of State's Office. Intervenor Put Missouri First was represented by Marc Ellinger and Stephanie Bell of Ellinger Bell LLC.

Plaintiffs presented two sets of joint stipulations of facts and exhibits, which were accepted into the record. The amended joint stipulation, filed with this Court on December 3, 2025, was agreed upon by all parties and was entered into the record with no objections. The initial joint stipulation, filed with this Court on October 28, 2025, was agreed to by Plaintiffs and Defendant. Intervenor objected to the entry of this stipulation into the record, but the Court hereby overrules that objection.

Intervenor also offered two exhibits, Intervenor's Exhibit A, a certificate of sufficiency issued by the Secretary of State for an initiative petition and Intervenor's Exhibit B, a certificate of insufficiency issued by the Secretary of State for an initiative petition. Neither of Intervenor's exhibits were documents issued regarding the referendum petition for House Bill 1. No party objected to the admission of Intervenor's exhibits. Intervenor called Chrissy Peters, Director of Elections for the Secretary of State's Office to testify.

Having considered the parties' pleadings, arguments, evidence, and the law, the Court finds that the Secretary of State's decision to reject the form of Plaintiffs' referendum petition sample sheet submitted on September 15, 2025 (identified by the Secretary of State's Office as 2026-RO03), was unlawful and that approval of the form of a referendum petition sample sheet is not necessary before a proponent of a referendum may start gathering signatures. Therefore, the Court issues its FINAL JUDGMENT for Plaintiffs and against Defendant and Intervenor.

Plaintiffs' First Amended Petition poses two questions for this Court to decide. First, was the Secretary of State's decision to reject the form of Plaintiffs' referendum petition submitted on September 15, 2025, lawful and second, is a referendum proponent required to wait to gather signatures until the Secretary has approved the form of the referendum sample sheet. The answer to both questions is no.

The Secretary rejected the form of the referendum sample sheet because the sample sheet was submitted prior to the Governor signing House Bill 1. Even if the Secretary is correct that a governor must sign a bill before a referendum sample sheet may be submitted (the Court need not decide that issue), whether the Governor signed House Bill 1 is not a matter of form. “[T]he secretary of state’s authority to review a referendum petition sample sheet for sufficiency as to form is limited to determining whether the sample sheet is substantially in the form required by 116.030[.]” *ACLU v. Ashcroft*, 577 S.W.3d 881, 892 (Mo. App. 2019).

“Neither the Secretary of State nor the Attorney General had the statutory authority. . .to reject the Sample Sheet on constitutional grounds and because no issue with the sufficiency has to form of the Sample Sheet has been identified, the Secretary of State was obligated . . . to approve the Sample Sheet.” *Id.* Yet the witness from the Secretary of States’ office testified in essence that the Secretary did exactly what the Court of Appeals says he cannot do. The form of Plaintiffs’ referendum sample sheet submitted on September 15, 2025, complies with all requirements in Section 116.030, RSMo. Therefore, the Secretary unlawfully rejected the form of the referendum sample sheet. The Court finds for Plaintiffs on Count I.

The Secretary also argued that Plaintiffs must have waited to gather signatures until the Secretary issued an approval as to form of the referendum petition sample sheet. That’s not what the statute says. Section 116.332 states:

“Before a...referendum petition may be circulated for signatures, a sample sheet must be submitted to the secretary of state in the form in which it will be circulated.” § 116.332.1, RSMo. Plaintiffs fulfilled this notice requirement by submitting referendum petition sample sheets to the Secretary of State.

The plain language of the statute only requires submission of a sample sheet before a petition is circulated. Therefore, the Secretary’s declared policy that he will not count signatures gathered prior to the date of the approval as to form of the referendum sample sheet is unlawful and contrary to Section 116.332.1, RSMo. The Court finds for Plaintiffs on Count II.

FINAL JUDGMENT is entered in favor of Plaintiffs on all Counts and against Defendant and Intervenor on all Counts. All other pending matters, motions, claims, or requests for relief not expressly granted herein are DENIED. It is therefore ORDERED, ADJUDGED, and DECREED that:

1. Plaintiffs’ referendum petition sample sheet submitted on September 15, 2025, is approved as to form as of that date because it substantially complied with the requirements of Section 116.030, RSMo;
2. Signatures may be gathered on a referendum petition once a sample sheet is submitted to the Secretary of State;
3. Signatures gathered on a referendum petition may not be rejected for the sole reason that they were gathered prior to the Secretary issuing an approval as to form of the referendum petition sample sheet;

4. The Secretary of State and anyone acting in concert with him are enjoined from rejecting Plaintiffs' referendum petition sample sheets on the basis that the Governor had not signed House Bill 1 at the time of submission of the sample sheets; and
5. The Secretary of State and anyone acting in concert with him are enjoined from rejecting any signatures gathered by Plaintiffs for the sole reason that the signatures were gathered on a date prior to the approval of the referendum petition sample sheet as to form.
6. Nothing in this Judgment precludes the Secretary of State from reviewing and invalidating signatures that are invalid for reasons other than being dated prior to approval of the form of the referendum petition sample sheet and nothing herein shall be construed as an order requiring the Secretary to certify the underlying referendum for the ballot.

So ordered, adjudged, and decreed this \_\_\_\_\_ day of \_\_\_\_\_, 2025

\_\_\_\_\_  
The Honorable Christopher K. Limbaugh



WRIT  
EXHIBIT 31

**WRIT**

**EXHIBIT 31**

IN THE CIRCUIT COURT OF COLE COUNTY  
19TH JUDICIAL CIRCUIT  
STATE OF MISSOURI

PEOPLE NOT POLITICIANS, *et al.*,

Plaintiffs,

Case No. 25AC-CC07128

MISSOURI SECRETARY OF STATE  
DENNY HOSKINS,

Defendant.

**STATE DEFENDANT'S PROPOSED ORDER AND JUDGMENT**

This matter came before the Court on a bench trial on December 8, 2025. Having been duly advised of the premises, this Court finds and concludes as follows:<sup>1</sup>

**FINDINGS OF FACT**

**I. Procedural Background**

1. Plaintiffs People Not Politicians and Richard von Glahn initiated this action on September 18, 2025, by way of Petition for Declaratory Judgment and Injunctive Relief against Defendant Missouri Secretary of State.

---

<sup>1</sup> To the extent a finding of fact is more properly characterized as a conclusion of law, it is adopted and incorporated as such by reference. To the extent a conclusion of law is more properly characterized as a finding of fact, it is adopted and incorporated as such by reference.

2. On September 29, Plaintiffs filed the operative Amended Petition for Declaratory and Injunctive Relief against the State Defendant.

3. The parties entered into joint stipulations and a bench trial was scheduled for November 3. However, the November 3 trial was continued at no fault of either party. The bench trial was rescheduled for November 13.

4. On November 12, Intervenor Put Missouri First moved to intervene.

5. On November 13, the Court granted Intervenor's motion over Plaintiffs' objection. The Court denied Intervenor's motion to continue the case to allow for receipt of discovery. The Intervenor then presented the Court with an application for change of judge, which the Court granted. The trial was continued, and a new judge assigned.

6. All parties (including Intervenor) entered into an amended joint stipulation of facts on December 3.

7. On December 4, the Court heard motions in this case. The Court denied Plaintiffs' motions to reconsider intervention and to strike. On reciprocal motions, the Court denied Plaintiffs' motion for protective order and granted Intervenor's motion to compel pursuant to a protective order. The Court took the State Defendant's and Intervenor's motions to dismiss under advisement.

8. The Court held a bench trial on December 8.

9. The Court orally ordered the parties to file proposed orders and judgments to the Court by December 10 at 5:00, p.m.

## II. Factual Determinations

### A. Stipulated Facts

10. People Not Politicians is a campaign committee organized in the State of Missouri.

11. Richard von Glahn is a Missouri citizen, resident of St. Louis County, a taxpayer, and qualified voter in the State of Missouri.

12. Richard von Glahn is the proponent of the referendum petitions 2026-R001; 2026-R002; 2026-R003; and 2026-R004.

13. Denny Hoskins is the Missouri Secretary of State.

14. Exhibit 1 is a true and correct copy of Make Your Voice Heard: Missouri's Initiative Petition Process, published by the Missouri Secretary of State.

15. On September 12, 2025, the Missouri General Assembly "truly agreed and finally passed" House Bill 1.

16. Exhibit 2 is a true and correct copy of House Bill 1 (2025).

17. Exhibit 3 is a true and correct copy of the Journal of the Senate from Friday, September 12, 2025.

18. Richard von Glahn submitted two referendum petition sample sheets (2026-R001 and 2026-R002) to the Secretary of State's Office on September 12, 2025.

19. Exhibit 4 is a true and correct copy of the referendum petition sample sheet 2026-R001.

20. Exhibit 5 is a true and correct copy of referendum petition sample sheet 2026-R002.

21. On September 12, 2025, the Secretary of State's Office sent a letter to Richard von Glahn regarding said sample sheets (2026-R001 and 2026-R002).

22. Exhibit 6 is a true and correct copy of the September 12, 2025 letter sent from the Secretary of State's Office to Richard von Glahn.

23. On September 14, 2025, the Secretary of State sent another letter to Richard von Glahn regarding the referendum petition sample sheets (2026-R001 and 2026-R002).

24. Exhibit 7 is a true and correct copy of the September 14, 2025 letter sent from the Secretary of State's Office to Richard von Glahn.

25. Richard von Glahn submitted a third referendum petition sample sheet (2026-R003) to the Secretary of State's Office on September 15, 2025.

26. Exhibit 8 is a true and correct copy of referendum petition sample sheet 2026-R003.

27. On September 15, 2025, the Secretary of State's Office sent a letter to Richard von Glahn regarding the referendum petition sample sheet (2026-R003).

28. Exhibit 9 is a true and correct copy of the September 15, 2025 letter sent from the Secretary of State's Office to Richard von Glahn.

29. Richard von Glahn's counsel sent a letter to the Secretary of State and the Attorney General dated September 15, 2025.

30. Exhibit 10 is a true and correct copy of the letter dated September 15, 2025 sent from Charles Hatfield to the Secretary of State and the Attorney General.

31. On September 26, 2025, the Secretary of State rejected Richard von Glahn's referendum petition sample sheets (2026-R001, 2026-R002, and 2026-R003) as to form.

32. Exhibit 11 are true and correct copies of the September 26, 2025 letters rejecting Richard von Glahn's referendum petition sample sheets as to form.

33. Governor Mike Kehoe signed House Bill 1 (2025) on September 28, 2025.

34. On September 29, 2025, Richard von Glahn submitted a fourth referendum petition sample sheet (2026-R004) to the Secretary of State's Office.

35. Exhibit 12 is a true and correct copy of referendum petition sample sheet 2026-R004.

36. On October 14, 2025, the Secretary of State approved the fourth referendum petition sample sheet as to form (2026-R004).



37. Exhibit 13 is a true and correct copy of the October 14, 2025 letter approving the referendum petition sample sheet as to form.

38. The Secretary of State stated in an October 15, 2025 press release that “[u]nder Missouri law, no signatures gathered before this approval date are valid.”

39. Exhibit 14 is a true and correct copy of the October 15, 2025 press release from the Secretary of State regarding referendum petition sample sheet 2026-R004.

40. Exhibit 15 is a true and correct copy of the October 16, 2025 press release from the Secretary of State regarding referendum petitions.

41. Referendum petitions on House Bill 1 have been circulated for signatures.

42. As of the time of trial, no signed referendum petitions have been submitted to the Secretary of State regarding House Bill 1.<sup>2</sup>

## **B. Non-Stipulated Factual Findings**

43. Between September 15, 2025 and September 28, 2025, Plaintiffs collected approximately 32,600 signatures in support of the referendum petition. See Ex. 17, ¶ 29.

---

<sup>2</sup> Plaintiffs submitted their referendum petition to the Secretary of State on December 9, 2025.

44. Between September 29, 2025 and October 14, 2025, Plaintiffs collected approximately 70,200 signatures in support of the referendum petition. *See id.* ¶ 32.

45. In their operative First Amended Petition, Plaintiffs did not allege specific facts speaking to irreparable harm faced by any Plaintiff absent injunctive relief. First Am. Pet. ¶¶ 32–62.

46. Plaintiffs likewise submitted no evidence and offered no testimony at trial respecting irreparable harm absent an injunction. *See* Trial Tr. 18:1–23:18.

47. Plaintiffs publically claim to have collected over 300,000 signatures. *See Missouri Congressional Maps on Hold*, Mo. Voter Prot. Coal., <https://mailchi.mp/movpc/mo-congressional-maps-on-hold?e=d63e233fc0>.<sup>3</sup>

48. All factual findings and credibility determinations not expressly made herein are found in accordance with the Court’s ruling. *See Prosecuting Attorney, 21st Judicial Circuit ex rel. Williams v. State*, 696 S.W.3d 853, 862–63 (Mo. banc), *cert. denied*, 145 S. Ct. 114 (2024).

---

<sup>3</sup> The Court has no reason to doubt Plaintiffs’ own public representations and therefore can take judicial notice of the amount of signatures that Plaintiffs claim to have collected. *See Whitmoor Realty, LLC v. Beckerle*, 588 S.W.3d 573, 579 (Mo. App. E.D. 2019) (recognizing that courts may notice information from a “credible source”).

## CONCLUSIONS OF LAW

### I. Legal Standards

49. Plaintiffs bear the burden of proving, by a preponderance of the evidence, that they are entitled to the injunctive and declaratory relief sought for their statutory challenges.

50. Jurisdiction requires “[t]he existence of an actual and vital controversy susceptible of some relief,” *L.E.C. v. K.R.C.*, 674 S.W.3d 97, 103 (Mo. App. E.D. 2023) (quoting *State ex rel. Reed v. Reardon*, 41 S.W.3d 470, 473 (Mo. banc 2011)), as “[i]t is well-established that Missouri courts do not determine moot cases or render advisory opinions,” *Friends of the San Luis, Inc. v. Archdiocese of St. Louis*, 312 S.W.3d 476, 483 (Mo. App. E.D. 2010). “A case is moot when an event occurs that makes the court’s decision unnecessary or makes granting effectual relief by the court impossible.” *Id.* “Even a case vital at inception . . . may be mooted by an intervening event which so alters the position of the parties that any judgment rendered merely becomes a hypothetical opinion.” *Id.* (quoting *City of Manchester v. Ryan*, 180 S.W.3d 19, 21 (Mo. App. E.D. 2005)).

51. “Ripeness requires the declaration sought to present a question appropriate and ready for judicial determination.” *Parker v. Castle View Country Club, Inc.*, 690 S.W.3d 918, 920 (Mo. App. S.D. 2024) (quoting *Cooper v. State*, 818 S.W.2d 653, 655 (Mo. App. W.D. 1991)). This requires that “the

judgment will declare a fixed right and accomplish a useful purpose.” *Local Union 1287 v. Kansas City Transp. Auth.*, 848 S.W.2d 462, 463 (Mo. banc 1993). “It is premature to render a judgment or opinion on a situation that may never occur.” *Id.*

52. “The primary goal of statutory interpretation is to give effect to legislative intent, which is most clearly evinced by the text of the statute.” *State ex rel. Bailey v. Fulton*, 659 S.W.3d 909, 912 (Mo. banc 2023) (citation omitted). “Words and phrases shall be taken in their plain or ordinary and usual sense, but technical words and phrases having a peculiar and appropriate meaning in law shall be understood according to their practical import.” § 1.090, RSMo; *see also Gross v. Parson*, 624 S.W.3d 877, 884 (Mo. banc 2021) (“Accordingly, ‘[a] word not defined in a statute is given its ordinary meaning pursuant to the dictionary.’” (alteration in original)). Statutory interpretations that render portions of a statute superfluous are disfavored. *See State ex rel. Goldsworthy v. Kanatzar*, 543 S.W.3d 582, 586 (Mo. banc 2018).

53. Entitlement to an injunction requires Plaintiffs to show that they succeed on “the merits of [their] claims” and that “weigh[ing] the harm[s]” favors the Plaintiffs in the absence of relief. *Est. of Hutchison v. Massood*, 494 S.W.3d 595, 608 (Mo. App. W.D. 2016) (quoting *State ex rel. Koster v. Didion Land Project Ass’n*, 469 S.W.3d 914, 918 (Mo. App. E.D. 2015)). Plaintiffs must also demonstrate: “1) no adequate remedy at law; and 2) irreparable harm will

result if the injunction is not awarded.” *Suppes v. Curators of Univ. of Mo.*, 613 S.W.3d 836, 847 (Mo. App. W.D. 2020) (citation omitted). “A permanent injunction should be granted sparingly in clear cases only, and the decree should be framed to afford relief to which complainant is entitled and not to interfere with legitimate and proper action by those against whom it is directed.” *Metmor Fin., Inc. v. Landoll Corp.*, 976 S.W.2d 454, 463 (Mo. App. W.D. 1998).

54. The Court may grant declaratory relief only when:

(1) a justiciable controversy that presents a real, substantial, presently-existing controversy admitting of specific relief, as distinguished from an advisory decree upon a purely hypothetical situation; (2) a plaintiff with a legally protectable interest at stake, “consisting of a pecuniary or personal interest directly at issue and subject to immediate or prospective consequential relief;” (3) a controversy ripe for judicial determination; and (4) an inadequate remedy at law.

*Mo. Soybean Ass’n v. Mo. Clean Water Comm’n*, 102 S.W.3d 10, 25 (Mo. banc 2003) (internal quotation omitted). “When seeking declaratory relief, a legally protectable interest exists if the plaintiff is directly and adversely affected by the action in question. The party seeking relief has the burden of establishing that they have standing.” *World Wide Tech., Inc. v. Off. of Admin.*, 572 S.W.3d 512, 519 (Mo. App. W.D. 2019).



## II. Threshold Matters

55. Before the Court can address the merits of Plaintiffs' claims, it must consider justiciability questions for both claims. *First*, it must determine whether Plaintiffs' Count I is moot. *Second*, it must decide if Count II is ripe for judicial review. The Court sides with the State on all both issues and holds that this matter is non-justiciable.

### A. Count I Is Moot

56. The State's first threshold argument is Count I of Plaintiffs' First Amended Petition—seeking a mandatory injunction requiring the Secretary to accept Plaintiffs' referendum petition as to form—is now moot.

57. On October 14, 2025, the Secretary of State approved as to form Plaintiffs' referendum petition on House Bill 1. *See* Ex. 16, ¶ 27. Other than the date of submission listed on the cover page, which is not part of the referendum petition, *see* §§ 116.030, 116.332, RSMo, the referendum-petition sample sheets submitted before the Governor signed House Bill 1 and the one approved as to form on October 14, 2025 are identical. *Compare* Ex. 4; Ex. 5; Ex. 8, *with* Ex. 12. Plaintiffs ask this Court to declare their sample sheets valid as to form and to enjoin the Secretary from rejecting their sample sheets. *See* First Am. Pet. ¶¶ 73–76. But given intervening action by the Secretary, those requests are now “plainly moot.” *Alaska v. U.S. Dep’t of Agric.*, 17 F.4th 1224, 1226 (D.C. Cir. 2021) (citation omitted). The Secretary's approval of their most



recently submitted referendum petition has given Plaintiffs what they wanted. This Court can offer no more “effectual relief”—any decision would be “unnecessary.” *L.E.C.*, 674 S.W.3d at 103.

58. Plaintiffs request that this Court declare valid any signatures gathered prior to submission of the operative referendum petition on September 29, 2025 does not spare Count I from mootness. *See* Trial Tr. 109:14–112:8. First, for the reasons explained in the next part, Plaintiffs’ concerns regarding signatures are not yet ripe for review. But even if they were, the request for a declaration—and further relief predicated on that declaration—does not speak to the Secretary’s accepting referendum petitions as to form. There must be “a real, substantial, presently-existing controversy admitting of specific relief” to warrant a declaratory judgment. *Mo. Soybean Ass’n*, 102 S.W.3d at 25. Indeed, Plaintiffs readily concede that the implications of the Secretary’s denying the first three sample sheets as to form are “not an issue . . . at this stage.” Plaintiffs’ Pretrial Br. at 6. Because the concerns predicated Count I—that the Secretary accept the referendum petition as to form—are now satisfied in Plaintiffs’ favor, the Court has no basis for issuing any judgment on Count I.

59. Missouri recognizes two narrow exceptions to mootness. *Hail v. Hail*, 380 S.W.3d 655, 656 (Mo. App. W.D. 2012). First, a court may consider a case if it “becomes moot after” argument and submission. *Id.* (quoting *Jenkins v. McLeod*, 231 S.W.3d 831, 833 (Mo App. E.D. 2007)). But this case had not

reached that point prior to the Secretary's approval as to form. *See supra* ¶ 36.

The second exception is if a case “presents an issue that (1) is of general public interest and importance, (2) will recur and (3) will evade appellate review in future live controversies.” *In re Mo.-Am. Water Co.*, 516 S.W.3d 823, 829 (Mo. banc 2017) (citation omitted). This exception is “very narrow.” *Id.* It too does not apply. Assuming that the methods for filing a referendum petition are of general public interest and importance, *see No Bans on Choice v. Ashcroft*, 638 S.W.3d 484, 489 n.9 (Mo. banc 2022), the other two requirements are not met.

60. There is no indication that this kind of controversy will recur. To invoke the public-interest exception, Plaintiffs “must point to circumstances which take the possibility of recurrence out of the realm of pure speculation.” *Jackson Cnty. Bd. of Election Comm’rs ex rel. Brown v. City of Lee’s Summit*, 277 S.W.3d 740, 745 (Mo. App. W.D. 2008) (citing *City of Los Angeles v. Lyons*, 461 U.S. 95, 109 (1983)). Plaintiffs have not carried this burden. Referendum petitioners in the past have waited until after a bill was signed into law before filing referendum sample sheets. *E.g., ACLU of Mo. v. Ashcroft*, 577 S.W.3d 881, 884 (Mo. App. W.D. 2019). Assuming that future petitioners will preemptively file sample sheets prior to a bill being signed is speculative. *Cf. Turlock Irrigation Dist. v. FERC*, 786 F.3d 18, 25 (D.C. Cir. 2015) (explaining that “‘predictions of future events (especially future actions taken by third parties)’ are too speculative”).

61. Even granting Plaintiffs some strong probability of recurrence, they have not shown that the question is capable of evading appellate review in the future. “For a case to evade review in future live controversies, the duration of the controversy must be so limited that it is not possible for a claim to be heard and appeals to be exhausted during its duration.” *Vernon Cnty. Republican Comm. ex rel. Haggard v. Lee*, 692 S.W.3d 439, 443 (Mo. App. W.D. 2024) (quoting *Bernhardt v. McCarthy*, 467 S.W.3d 348, 351 (Mo. App. W.D. 2015)). “Missouri courts have a long history of resolving cases involving election-related issues on an extremely expedited basis, and it is certainly possible for future claims, *if expedited*, to be heard and appeals to be exhausted within the statutory time constraints.” *Id.* (emphasis added). Plaintiffs did not seek expedited review—*e.g.*, a temporary restraining order—by this Court. Instead, Plaintiffs note the procedural history of this case to attempt to obviate their need to have requested expedited review, but none of this relieves them of not having done so. It would be incongruous now to accept their claim that this issue will evade review. *See Gartner v. Mo. Ethics Comm’n*, 323 S.W.3d 439, 442 (Mo. App. E.D. 2010) (declining to exercise the public-interest exception where future litigants can use mechanisms for expedited review).

62. Governing cases show how a question like this would be practically capable of expedited review in a future live controversy. For example, in *ACLU of Missouri v. Ashcroft*, after the Secretary rejected the proposed referendum

petition as to form, both this Court *and* the court of appeals issued rulings within thirty-two days of the plaintiffs filing their petition and request of a temporary restraining order. *See* 577 S.W.3d at 885–87. Again, unlike Plaintiffs in the present case, the ACLU “noted the urgency of time.” *Id.* at 885. As the Governor has forty-five days to sign the bill before it automatically becomes enacted, Mo. Const. art. III, § 31,<sup>4</sup> this issue *is* capable of review. Therefore, the public-interest exception to mootness does not apply.

63. The Court dismisses Count I of Plaintiffs’ First Amended Petition. The Secretary accepted the referendum petition as to form on October 14, 2025—giving Plaintiffs’ their desired relief. *See supra* ¶ 36.

### **B. Count II Is Not Ripe**

64. Count II of Plaintiffs’ Amended Petition also warrants dismissal because it requests relief predicated on concerns that may never happen. For a referendum petition to qualify for inclusion on the ballot, the proponent must collect signatures of “five percent of the legal voters in each of two-thirds of the congressional districts.” Mo. Const. art. III, § 52(a). In their requests for relief, Plaintiffs ask this Court to declare that Plaintiffs could gather signatures after filing the initial referendum petition on September 12, 2025. First Am. Pet. at

---

<sup>4</sup> The period to return the referendum petition is triggered by “final adjournment of the session of the general assembly which passed the bill,” Mo. Const. art. III, § 52(a), so the relevant time period for the Governor to act is governed by “[w]hen the general assembly adjourns,” *id.* art. III, § 31. This is “forty-five days.” *Id.*

12 (prayer for relief). They also seek an injunction prohibiting rejection of signatures collected from that date forward solely because they were gathered before the Secretary approved the operative petition as to form on October 14, 2025. *See id.* Plaintiffs, apparently, fear that they will not have collected sufficient valid signatures. *See* Mo. Const. art. III, § 52(a). But that fear is entirely speculative. *Cf. supra* ¶ 47.

65. Count II of the Amended Petition turns on a hypothetical, future injury—that the Secretary of State may reject some signatures and prevent Plaintiffs from meeting the necessary signature threshold. But this is “a situation that may never occur,” so this case is not ripe. *Local Union 1287*, 848 S.W.2d at 463. For one thing, the Secretary of State has not rejected any signatures—indeed, no formal determination by the Secretary has been made respecting the validity of the signatures at issue. *See* Trial Tr. 91:3–14.

66. Moreover, nowhere have Plaintiffs alleged that they will be unable to submit a final referendum petition with sufficient signatures if the Secretary rejects signatures collected prior to the submission or approval as to form of the now-approved sample sheet. Plaintiffs could very well gather enough signatures to meet or exceed their threshold without needing to rely on previously collected signatures. Their ground operation collected over 100,000 signatures as of mid-October, *see supra* ¶¶ 43–44, and Plaintiffs now claim to have collected over 300,000 signatures, *see supra* ¶ 47. Hence, their concern



about not meeting the signature threshold if the Secretary rejects signatures predating a valid referendum petition may never come to pass.

67. This is quintessentially a claim where the Court should avoid “premature adjudication” of an issue to prevent “entangling [itself] in [an] abstract disagreement.” *Graves v. Mo. Dep’t of Corrs., Div. of Prob. & Parole*, 630 S.W.3d 769, 773 (Mo. banc 2021) (citations omitted). Only if (a) the Secretary rejects these older signatures and (b) that rejection prevents Plaintiffs from meeting the signature threshold will the question presented in Count II “be ready for judicial decision.” *Local Union 1287*, 848 S.W.2d at 463. It is way too early for this Court to assume that either—let alone both—of those conditions will occur. Therefore, this Court dismisses Count II of Plaintiffs’ First Amended Petition.

### III. The Merits

68. Although the Court’s determination on the threshold matters fully disposes of this suit, the Court recognizes that these justiciability matters involve contentious questions. The merits, however, are much clearer. Hence, this Court exercises its discretion to address the substantive merits of Plaintiffs’ claims so that this entire case can be addressed in a single appeal without a remand. Ultimately, even if there is a justiciable controversy, this Court concludes that all of Plaintiffs’ claims fail as a matter of law.



69. First, for Count I, the Secretary of State rightly rejected Plaintiffs' previously filed petitions because House Bill 1 was not yet a law. Until Governor Kehoe signed House Bill 1 on September 28, 2025, it was merely a bill, not a law. Referendum petitions can only challenge enacted laws, not bills. Mo. Const. art. III, § 49 ("The people . . . reserve power to approve or reject by referendum any act of the general assembly . . ."). Hence, the Secretary correctly rejected the first three referendum petitions submitted as to form.

70. Second, because the first three petitions were invalid, any signatures collected on those petitions are likewise invalid. Missouri law is clear that there must be a valid petition before a referendum proponent can commence collecting signatures. § 116.332.1, RSMo; *see also* *ACLU of Mo.*, 577 S.W.3d at 890 (describing review under § 116.332 as "during the 'pre-signature collection stage' of the referendum process"). Hence, Plaintiffs' attempts to force the Secretary to accept signatures collected prior to a valid petition must fail.

**A. Count I—referendum petitions can only be had on enacted laws, so Plaintiffs' challenge fails as a matter of law.**

**1. Referendum petitions may only challenge enacted laws.**

71. All relevant provisions governing the referendum process make clear that a referendum petition can only be initiated against enacted laws, not bills. As the Missouri Supreme Court has long held, "the intendment of the framers of the [Missouri] Constitution was that all *laws*, except those declared non-

referable, should be subject to referendum.” *State ex rel. Moore v. Toberman*, 250 S.W.2d 701, 706 (Mo. banc 1952) (emphasis added). The form for submitting a referendum petition—specifically codified by statute—reflects this law requirement. It limits referendum petitions to “any law passed by the general assembly of the State of Missouri.” § 116.030, RSMo. Indeed, procedurally, in filing a referendum petition, the petitioner must cite “all sections of existing law or of the constitution which would be repealed by the measure.” *Id.* § 116.050.2(2). Bills, of course, are not “existing law” and they cannot be “repealed”—they have not yet been enacted.

72. Even putting common-sense syllogisms aside, the statute’s precise language serves a purpose. The statute’s use of “law” (as opposed to “bill”) is no accident, and courts must construe the statute to give effect to the legislature’s chosen words. *See State ex re. Bailey v. Fulton*, 659 S.W.3d 909, 912 (Mo. banc 2023) (“The primary goal of statutory interpretation is to give effect to legislative intent, which is most clearly evidenced by the plain text of the statute.” (quoting *State ex rel. Goldsworthy v. Kanatzar*, 543 S.W.3d 582, 585 (Mo. banc 2018))). “Law” has a specific meaning—a bill signed by the Governor (or not acted on by the Governor within his constitutionally allotted period). Mo. Const. art. III, § 31; *see also id.* § 21 (“No law shall be passed except by bill . . .”). As the Missouri Supreme Court has explained, under the current Missouri Constitution, “passage of a bill by the general assembly plus

its approval by the governor produces a validly enacted law.” *Brown v. Morris*, 290 S.W.2d 160, 166 (Mo. banc 1956).

73. Giving full construction to the statutes governing the referendum petition leads to a straightforward conclusion—only an enactment signed by the Governor can be challenged by a referendum. Hence, no petition filed prior to September 28, 2025, when Governor Kehoe signed House Bill 1, see Ex. 16, ¶ 24, could comport with statutory requirements.

74. Ultimately prevailing here requires Plaintiffs to articulate that the statute’s requirement for a submitted form to seek a referendum on “any law,” § 116.030, RSMo, “interfere[s] with or impede[s]” the constitutional right to a referendum, *No Bans on Choice*, 638 S.W.3d at 489 (quoting *Rekart v. Kirkpatrick*, 639 S.W.2d 606, 608 (Mo. banc 1982)). They fail at this task.

75. Beginning with the constitutional right of referendum, “restrictions on the people’s power of [referendum] must be found in the constitution.” *Coleman v. Ashcroft*, 696 S.W.3d 347, 352 (Mo. banc 2024). “Legislation to implement the referendum process is presumed to be constitutionally valid.” *No Bans on Choice*, 638 S.W.3d at 489. Ultimately, the statutory requirements that a proposed referendum challenge an enacted law pose no such impediment—they straightforwardly apply the Missouri Constitution itself.

76. The Missouri Constitution reserves to the people the power to “approve or reject by referendum *any act* of the general assembly.” Mo. Const. art. III,

§ 49 (emphasis added). This dispute boils down to whether an “act” of the legislature is a bill or a law. To answer this question, the Court must interpret Section 49 of the Missouri Constitution.

77. “This Court’s primary goal in interpreting Missouri’s constitution is to ascribe to the words of a constitutional provision the meaning that the people understood them to have when the provision was adopted.” *C.S. v. Mo. Highway Patrol Crim. Just. Info. Serv.*, 716 S.W.3d 264, 267 (Mo. banc 2025) (quoting *State v. Honeycutt*, 421 S.W.3d 410, 414–15 (Mo. banc 2013)). The initiative and referendum provisions of the Missouri Constitution, Article III, §§ 49–53, are derived from the initiative and referendum provision of the 1875 Missouri Constitution, Article IV, § 57 adopted in 1908. “This single-paragraph section [was] broken down in the present Constitution into five separate sections, numbered 49 to 53, inc[lusive].”<sup>5</sup> The referendum provisions, Sections 49, 52(a), and 52(b), contain a few clarifying words but otherwise are identical to the original provision.<sup>6</sup>

---

<sup>5</sup> *The Constitution of the State of Missouri: Adopted by the People on February 27, 1945, with Annotations and Appendix Comparing the Provisions Therein with the Provisions in the Constitution of 1875, as Amended and in Force on That Date* 55 (Lester G. Seacat, ed., 1945), [https://scholarship.law.missouri.edu/mo\\_constitutions\\_race/6/](https://scholarship.law.missouri.edu/mo_constitutions_race/6/).

<sup>6</sup> *Id.* at 55–57. Section 49: “The people reserve power to propose and enact or reject laws and amendments to the Constitution by the initiative, independent of the general assembly, and also reserve power to approve or reject by referendum any act of the general assembly, except as hereinafter provided.” (changes underlined). Section 52(a): no changes. Section 52(b): “The veto power of the governor shall not

78. Beginning with the text of Section 49, it states that “[t]he people reserve power to propose and enact or reject laws and amendments to the Constitution by the initiative, independent of the general assembly, and also reserve power to approve or reject by referendum any act of the general assembly, except as hereinafter provided.” The first part of this provision explicitly allows the people to “reject laws.” Although this refers to the initiative, traditionally “the initiative allows the electorate to *adopt* positive legislation.” *Ariz. State Leg. v. Ariz. Indep. Redistricting Comm’n*, 576 U.S. 787, 794 (2015) (emphasis added). Conversely, the referendum is the “negative check”—allowing voters to approve or reject legislation. *Id.* It would make little sense to allow for the rejection of only laws by initiative while allowing the rejection of bills by referendum. Rather, because the referendum is the people’s tool to reject laws, *see id.*, it makes more sense to use “reject[ing] laws” to inform the construction of an “act of the general assembly.”

79. At the very least, Section 49’s use of both “reject laws” and “reject . . . any act” creates an ambiguity. It certainly does not compel, as Plaintiffs assert,

---

extend to measures referred to the people. All elections on measures referred to the people shall be had at the general state elections, except when the general assembly shall order a special election. Any measure referred to the people shall take effect when approved by a majority of the votes cast thereon, and not otherwise. This section shall not be construed to deprive any member of the general assembly of the right to introduce any measure.” (change underlined). None of these changes have any bearing on the question of what may be challenged by a referendum.



that an unenacted bill qualifies as an “act.” *See* Trial Tr. 106:6–14. And sure enough, any potential ambiguity of Section 49 is resolved by Missouri Supreme Court decisions contemporaneous with the adoption of this initiative and referendum provision. *Cf. Edwards’ Lessee v. Darby*, 25 U.S. (12 Wheat.) 206, 210 (1827) (extolling “the construction of a doubtful and ambiguous law” by an authoritative body).

80. Specifically, these decisions show that an “act of the general assembly” is an enacted law, not a bill. As one case explained, the original referendum provision “preserved” the Governor’s veto “in the matter of enacting or defeating laws.” *State ex rel. Lashly v. Becker*, 235 S.W. 1017, 1022 (Mo. banc 1921). Thus, it followed that a “legislative act[] so referred [to the people] . . . include[d] the approval and veto power of the Governor.” *Id.* at 1023; *see also id.* (noting that “all legislative authority was vested in a given legislative forum (including the General Assembly and the Governor)”). As another case made clear, this understanding of what constituted a legislative act extended to the referendum: “This law is an act of the Legislature, and under [the referendum provision] of the Constitution is subject to the referendum.” *Fahey v. Hackmann*, 237 S.W. 752, 762 (Mo. banc 1922). So, historically construed, an “act” is not an unenacted bill. *See Moore*, 250 S.W.2d at 704 (“No one will contend that when the phrase in [an] old [constitutional provision] was brought forward into [the] present [provision] a different meaning was given in.”).



81. Plaintiffs rely on *State ex rel. Moore v. Toberman* to argue that the Governor's signature is not required for a referendum. But, in that case, the Missouri Supreme Court was interpreting "[t]he phrases 'law passed by the general assembly' and 'laws previously passed.'" 250 S.W.2d at 704 (quoting Mo. Const. art. III, § 29) (emphasis added). This both is a separate constitutional provision and lacks the same words and language of Section 49. Worse for Plaintiffs, *Moore* supports State Defendant's interpretation of "act of the general assembly" based on historical precedent. *See id.* ("No one will contend that when the phrase in [an] old [constitutional provision] was brought forward into [the] present [provision] a different meaning was given in.").

82. If that were not enough, the surrounding constitutional text in the referendum provisions also reinforces this understanding. Like statutes "passed in the same legislative session as part of the same legislative act, this Court must attempt to harmonize" these referendum provisions, which were all simultaneously adopted in 1945 Constitution. *State ex rel. T.J. v. Cundiff*, 632 S.W.3d 353, 357 (Mo. banc 2021). And the referendum provisions are materially the same as the original referendum and initiative provision adopted in 1908. *See The Constitution of the State of Missouri*, *supra* note 5, at 55–57. None of the other referendum provisions use "act," so the meaning of "act" cannot be readily taken from these provisions. *See* Mo. Const. art. III, §§ 52–53. However, the meaning of "act" can be discerned from

“harmoniz[ing]” Section 49 with its implementing provisions. *State ex rel. T.J.*, 632 S.W.3d at 357. Notably, in detailing the referendum exceptions and procedures, Section 52(a) uses both “law[]” and “bill.” (None of the other provisions use either these terms in context.<sup>7</sup>) Examining how Section 52(a) uses these terms shows that an “act” can only be a law.

83. Section 52(a) establishes the procedure for how to refer a law to the people: the signature requirements and the timing. But in doing so, it excepts “laws” dealing with public emergencies and appropriations—not “bills.” *Id.* This word choice is telling. The exception is for the substance of enacted laws. If a public-emergency or appropriations provision—once enacted into law—will ultimately be exempted from a referendum, then it would be absurd and contradictory to allow a referendum petition to proceed before that bill has been signed by the Governor (or has become law if the Governor failed to act within the allotted time). Any other reading—allowing for an unenacted bill to get referred—would disharmonize the meaning of this constitutional provision. Instead, the plain meaning of this provision confirms that a referendum may only be initiated on an enacted law.

84. “Bill” is used in the timing sentence of Section 52(a): “Referendum petitions shall be filed with the secretary of state not more than ninety days

---

<sup>7</sup> Article III, Section 53 uses “laws,” but it is not in reference to the subject of a referendum petition.

after the final adjournment of the session of the general assembly which passed the bill on which the referendum is demanded.” Unlike with “law” in the first sentence, “bill” is not used in reference to the subject of the referendum. Instead, it is part of the restrictive clause (“which passed the bill on which the referendum is demanded”) giving essential information about the time requirements. As the timing provision links filing the referendum petition with the “adjournment of the session of the general assembly,” it stands to reason that the Constitution would link the time with general assembly’s part of the legislative action—“pass[ing] the bill.” See Mo. Const. art. III, § 31 (“Every bill which shall have passed the house of representatives and the senate . . .”). So Section 52(a)’s “bill” does not give meaning to an “act” of the General Assembly.

85. Finally, the Missouri Supreme Court has recently recognized that the referendum can only be had on a bill “signed [into law] by the governor.” See *No Bans on Choice*, 638 S.W.3d at 491 (determining that a referendum campaign benefitted when “the challenged legislation [was] signed by the governor . . . 113 days before the final adjournment of the legislative session”). All told, statutory and constitutional text, history, precedent, and common sense show that the Missouri Constitution did not grant a right to pursue referenda against uncoded bills. Cf. *Cummings v. Missouri*, 71 U.S. (1 Wall.) 277, 325 (1866) (“The Constitution deals with substance, not shadows.”).

Because only a codified law can predicate a referendum, the Secretary properly concluded that the first three referendum petitions could not proceed. Hence, the Secretary correctly rejected Plaintiffs' referendum petitions submitted before House Bill 1 was signed into law.

**2. Because the first three petitions did not challenge an enacted law, the Secretary properly rejected the petitions as to form.**

86. Under the governing statute, the Secretary could not approve the first three petitions as to form because they challenged bills, not enacted laws. As previously explained, the form codified in Section 116.030 requires a "law." See § 116.030, RSMo ("on any law passed by the general assembly"); *id.* (form has a blank for "title of law"). "Though the phrase 'sufficiency as to form' in section 116.332 is not afforded an express statutory definition, section 116.030 effectively serves as the definition for the phrase . . . ." *ACLU of Mo.*, 577 S.W.3d at 890. The Secretary of State's review under Section 116.332 is "limited to determining whether the sample sheet is substantially in the form required by section 116.030." *Id.* at 892.

87. Part of this review is ensuring "compliance" over the "insertion of required or requested information" in "blank spaces." *Id.* at 891. One of these blank spaces is for the "title of law." § 116.030, RSMo. The statute also requires that the referendum proponent attach to the form "all sections of existing law . . . which would be repealed by the measure." *Id.* § 116.050.2(2)

(emphasis added). The first three referendum petitions were not for an enacted law and did not “[i]nclude all sections of existing law . . . which would be repealed by the measure,” so the Secretary of State properly rejected these sample sheets. *Id.* Said differently, there was no “law” with a “title” capable of meeting the form’s requirements prior to the Governor’s signing House Bill 1. *Id.* § 116.030.

88. Confirming that a petition is sufficient as to form is not a mere clerical act. It helps ensure that “the constitutional requirements [for placing a measure on the ballot] have been met.” *Mo. Elec. Coops. v. Kander*, 497 S.W.3d 905, 913–14 (Mo. App. W.D. 2016) (alteration in original) (quoting *Missourians to Protect the Initiative Process v. Blunt*, 799 S.W.2d 824, 828 (Mo. banc 1990)). The Secretary’s review of the petition is limited as to form. Specifically, the Secretary cannot reject as to form a petition whose aim may not be lawful. *See ACLU of Mo.*, 577 S.W.3d at 891 (explaining that “the plain and ordinary dictionary meaning of the word ‘form’” precluded substantive legal review of the referendum’s aim); *accord id.* at 891 (reasoning that “the qualifier ‘as to form’ would be rendered unnecessary and superfluous if review of a sample sheet for ‘sufficiency’ extended to all matters, including substantive and constitutional matters”). Plaintiffs therefore try to pigeonhole the denials of the first three sample sheets as rejections rooted in substantive legal concerns.



89. But finding obvious deficiencies from noncompliance with the rules of the statutory form (like attaching an unsigned bill rather than a “law”) are not judgments based substantive legal considerations—and the Secretary need not approve forms with basic deficiencies. *See ACLU of Mo.*, 577 S.W.3d at 891 (citing a definition of “form” as a “procedure according to rule or rote” (quoting WEBSTER’S THIRD NEW INTERNATIONAL 892 (1993))). Allowing a referendum petition on a bill would not comport with the statutory meaning of “law.” § 116.030, RSMo. Meanwhile, correctly construing “law” does not render any provision “unnecessary and superfluous.” *ACLU of Mo.*, 577 S.W.3d at 891.

90. Plaintiffs’ only effort to grapple with the text of Section 116.030 is their assertion that the “language says nothing about the governor signing [the bill] nor requires that a proponent wait to submit a referendum sample sheet until the governor signs a bill.” Plaintiffs’ Opp. MTD at 9; *see also* Plaintiffs’ Pretrial Br. at 4. But including a reference in the statute to the Governor’s signature would be odd, and even problematic. The statute requires that the petition seek to refer “any law.” § 116.030, RSMo. Legislation only becomes enacted law after either the Governor signs the bill or the time for the Governor to act on the bill expires. Mo. Const. art. III, § 31. So a statutory reference to the Governor’s signature would be both superfluous and potentially confusing given that a bill can become law through the Governor’s inaction. *See id.* (“If any bill shall not be returned by the governor within the time limits prescribed



by this section it shall become law in like manner as if the governor had signed it.”). Hence, contrary to Plaintiffs’ suggestions, the Secretary acted in accordance with his role in denying as to form petitions that did not comply with the form prescribed by the statute itself. So the Secretary did not exceed his authority under Section 116.332.1 when he rejected the first three referendum petitions as to form.

91. And beyond labels, rejecting the sample sheets as to form complies with the Constitution. In their effort to prevail, Plaintiffs place a lot of emphasis on an absolute right to ninety days to collect signatures. *See* Trial Tr. 98:17–99:19 (arguing that waiting for the Governor’s signature eats into this time). But nothing supports an unqualified right to that timeframe. *See infra* ¶¶ 100–01.

92. “The legislature inherently has the power to reduce the time to circulate a referendum petition on any particular piece of legislation by delaying the passage of that legislation until the end of the legislative session.” *No Bans on Choice*, 638 S.W.3d at 491. The Legislature passing the bill and the Governor signing it are both part of the legislative process. Mo. Const. art. III, § 31. Even though Governor Kehoe did *not* use all allotted time to sign the redistricting bill, the Missouri Supreme Court has recognized that the governor has the practical ability to wait before signing a bill and thus “reduce the time to circulate a referendum petition.” *See No Bans on Choice*, 638 S.W.3d at 491.

93. This is not a mere “procedural formalit[y].” *See id.* at 492. A referendum petition seeking to challenge a bill before this lawmaking process ends is simply not a valid form that the Secretary can approve. Therefore, the Secretary of State correctly rejected as to form Plaintiffs’ referendum petitions submitted before the Governor had signed House Bill 1 into law without creating an unnecessary impediment on the ability to bring a referendum petition. *See id.*; *see also* Trial Tr. 118:16–119:1.

94. The facts of this case also demonstrate that waiting for the Governor’s signature did not impede the referendum effort. *See supra* ¶¶ 46–47.

95. The Court accordingly awards judgment to Defendant on Count I.

**B. Count II—Missouri law does not permit gathering signatures prior to a valid referendum petition, so Plaintiffs’ challenge fails as a matter of law.**

96. Plaintiffs’ efforts to force the Secretary to accept signatures gathered prior to the existence of a valid referendum petition must also fail. As discussed above, Plaintiffs submitted three referendum petitions before House Bill 1 was signed into law by the Governor. The Secretary of State properly rejected these petitions as to form. Because these petitions were invalid, all signatures collected in support of them occurred “during the ‘pre-signature collection stage’ of the referendum process.” *ACLU of Mo.*, 577 S.W.3d at 890 (emphasis added). Section 116.332.1 specifically requires that a petitioner have submitted a valid sample sheet to the Secretary of State “[b]efore . . . a

referendum petition may be circulated for signatures.” If a valid sample sheet must be submitted to allow signature gathering, signatures collected on a sample sheet rejected as to form are *per se* invalid. Hence, under the statute and because no valid referendum petition yet existed, the Court cannot order the Secretary to count any signatures gathered prior to September 28, 2025.

97. And because the rejection of referendum petitions as to form did not “interfere with or impede a right conferred by the constitution,” not counting those signatures can no more “interfere with or impede” the constitutional right of the referendum. *See No Bans on Choice*, 638 S.W.3d at 489 (quoting *Rekart*, 639 S.W.2d at 608). Nothing in Missouri law prohibits requiring that a proponent submit a valid referendum petition before collecting signatures. The Missouri Supreme Court has held that the signature-circulation time periods under Section 116.332.1 for an initiative are “established by Mo. Const. art. III, § 50.” *State ex rel. Upchurch v. Blunt*, 810 S.W.2d 515, 517 (Mo. banc 1991). Section 50 is the form-and-procedure provision for initiative petitions, and its only explicit time requirement is that the initiative petition be “filed . . . not less than six months before the election.” Mo. Const. art. III, § 50; *see also Upchurch*, 810 S.W.2d at 517. Nonetheless, the Supreme Court held it “clear” that the time period was “framed by reference to general elections” and initiative petition sample sheets could only be submitted “after one general election.” *Upchurch*, 810 S.W.2d at 517.

98. Article III, Section 52(a) of the Missouri Constitution is the referendum-provision analog to Section 50. Section 52(a) also only has one explicit time requirement: Referendum petitions must be “filed . . . not more than ninety days after the final adjournment of the session.” Like with Section 50, Section 52(a)’s time period is equally “clear.” See *Upchurch*, 810 S.W.2d at 517. Here, the time period is properly framed by reference to “laws.” See Mo. Const. art. III, § 52(a) (excepting emergency and appropriations “laws”). “Although the authority is not semantically explicit, the constitutional provision[] [is] nonetheless plain in meaning.” See *Upchurch*, 810 S.W.2d at 517. Therefore, Section 52(a) permits submission of sample referendum petitions to the Secretary of State from any time after enactment until ninety days after the final adjournment of the session.

99. This point is illustrated by *State ex rel. Basinger v. Ashcroft*, 677 S.W.3d 562 (Mo. App. W.D. 2023), which operationalized *Upchurch*. There, a petitioner had filed his sample initiative petition for 2024 election two months before 2022 election and thus was outside the time period proscribed by Section 50 as interpreted by *Upchurch*. *Id.* at 567. As a result, the Secretary of State’s obligation to process the initiative petition “did not arise until” after the election. *Id.* Allowing the petitioner in *Basinger* to have counted any signatures collected in the meantime would have defeated the court’s ruling. Besides a different constitutional time period, referendum petitions are no

different. Hence, the Missouri Constitution does not allow the Secretary of State to count signatures collected before the enactment of House Bill 1.

100. Plaintiffs' only effort to engage with Section 52(a) is to say that the "plain language" requires that a referendum proponent have "at least ninety days to gather signatures." Plaintiffs' Pretrial Br. at 9–10; *see also* Plaintiffs' Opp. MTD at 15 ("Plaintiffs have *at least* ninety days to gather signatures."). This position disregards the actual text, harmonizing constitutional provisions, and precedent. First, the "plain language" does not grant proponents a right to a firm ninety-day signature-gathering window. Section 52(a) only sets a due date for petitions to "filed." Mo. Const. art. III, § 52(a) (emphasis added). Nothing in the text creates a right to ninety days to collect signatures. Finding such a right would require reading out "not more than ninety days" and changing it to "at least ninety days." *See id.* Even ignoring Plaintiffs' effort to convert Section 52(a)'s language from "not more than" to "at least" ninety days, it is likewise nonsensical to suggest that the words "be filed" means "gather signatures." *See id.*

101. Second, because no law (except for an appropriation act) can "take effect until ninety days after the adjournment," *id.* § 29, Section 52(a)'s requirement that a referendum petition be filed within ninety days after adjournment is "consistent" with Section 29. *See ACLU of Mo.*, 577 S.W.3d at 888–89; *see also Upchurch*, 810 S.W.2d at 516 ("This Court is required to give



due regard to the primary objectives of the constitutional provision under scrutiny, as viewed in harmony with all related provisions.”). Finding a novel right to ninety days for a proponent to collect signatures would break this harmony.

102. Third, Plaintiffs suggest that this “situation is different” because House Bill 1 was passed on the last day of the legislative session. Plaintiffs’ Pretrial Br. at 10; *see also* Plaintiffs’ Opp. MTD (“Depending on when the General Assembly passes the legislation, a proponent of a referendum may have more than ninety days to gather signatures.”). But “delaying the passage of that legislation until the end of the legislative session” does not alter when a petition is due—constitutionally reducing Plaintiffs’ time to collect signatures. *No Bans on Choice*, 638 S.W.3d at 491. And “[t]he fact that the governor did not approve the bill until after the beginning of the recess does not arrest” the constitutional deadline for submitting a referendum petition. *Moore*, 250 S.W.2d at 704. Plaintiffs’ aspirational interpretation of Section 52(a), *see* Trial Tr. 98:21–99:4, must give way to the provision’s plain meaning.

103. As for signatures collected on the fourth referendum petition before the Secretary of State’s approval, these too are invalid. In *No Bans on Choice*, the Missouri Supreme Court held that the statutory “prohibition on collecting referendum petition signatures prior to the Secretary’s certification of the official ballot title ‘interferes with and impedes’ the constitutional right of



referendum.” 638 S.W.3d at 492. The Secretary of State proceeds to certifying the ballot title only after the referendum petition is deemed sufficient as to form, *see* § 116.334, RSMo, but while this ballot title certification is ongoing, the petitioner has an approved referendum petition, *see No Bans on Choice*, 638 S.W.3d at 492. But unlike certifying the ballot title, the Secretary’s approval of the referendum petition “occur[s] at the beginning of the process.” *Coleman*, 696 S.W.3d at 351. This approval is vitally “important” to protecting the “citizens’ constitutional power of [referendum] petition.” *See id.* at 351–52. It allows the Secretary of State to correct an error in form “with minimum disruption.” *Id.* at 351.

104. Permitting petitioners to collect signatures on a referendum petitions before approval as to form will sow confusion. For example, a voter wanting to sign a referendum petition could (as here) sign an invalid referendum petition. But when later approached with a valid referendum petition over the same law, he might not sign it believing he had already signed a previously valid petition. In this way, his signature could go uncounted. In other words, signatories may have never realize that they signed an invalid petition. Alternatively, one could imagine a situation where the first petition were valid. But the voter, believing the first petition was invalid, signed a second petition and unwittingly exposed himself to liability for ballot fraud. *See* § 116.090.1(1), RSMo. Providing basic ground rules to keep overzealous

proponents from gathering signatures on invalid petitions does not “interfere with or impede” the citizens’ right of referendum. *See No Bans on Choice*, 638 S.W.3d at 489. The Secretary’s approval as to form provides a clear line of demarcation to voters for when they can safely sign a referendum petition and have their voice heard, and this Court cannot order the Secretary to count any signatures prior to his approval as to form.

105. Therefore, this Court enters judgment for Defendant on Count II.

#### **IV. Denial of Injunctive Relief**

106. Given the legal deficiencies in all Counts, Plaintiffs’ requests for permanent-injunctive relief necessarily fail. *See Est. of Hutchison*, 494 S.W.3d at 608 (explaining that “at the permanent injunction stage, the trial court must finally determine the merits of the claims” (citation omitted)). The merits favor the Defendant here—and so do the equities.

107. Plaintiffs have not articulated any harm warranting a mandatory injunction. *See, e.g., Rebman v. Parson*, 576 S.W.3d 605, 612 (Mo. banc 2019) (finding irreparable harm based on a record of how the governmental action impacted the plaintiff). Plaintiffs failed to allege any inability to collect the requisite signatures—even if their pre-enactment and pre-approval signatures are rejected—within the constitutional time period. *See generally* First Am. Pet.; *see also Suppes*, 613 S.W.3d at 847 (“To be entitled to an injunction, a

party must demonstrate: 1) no adequate remedy at law; and 2) irreparable harm will result if the injunction is not awarded.” (citation omitted)).

108. And in litigating this case, Plaintiffs have never articulated an inability to meet the signature thresholds if their pre-approval signatures are not counted. *See supra* ¶¶ 45–46. Plaintiffs have therefore failed to carry their burden of showing a harm warranting a permanent injunction. *See Suppes*, 613 S.W.3d at 847 (citation omitted); *see also Trump v. CASA, Inc.*, 606 U.S. 831, 854 (2025) (“[I]n equity, ‘the broader and deeper the remedy the plaintiff wants, the stronger the plaintiff’s story needs to be.’” (citation omitted)).

109. Moreover, Plaintiffs failed to request injunctive relief for their Count II, only requesting an injunction to prohibit the Secretary from rejecting signatures in their prayer for relief. *See* First Am. Pet. ¶¶ 79–86; *id.* at 12 (prayer for relief). But “[g]enerally, the prayer for relief is not considered part of the petition.” *City of Greenwood v. Martin Marietta Materials, Inc.*, 311 S.W.3d 258, 264 (Mo. App. W.D. 2010). “This rule is particularly applicable in equitable proceedings.” *Id.* (citation omitted). Courts can grant unrequested relief only if it resolves “‘issues raised by the allegations in the cause pleaded’”; courts cannot “decid[e] an *unpleaded* factual issue.” *Id.* (citation omitted).

110. Therefore, Plaintiffs are not entitled to injunctive relief for their Count II because they have neither requested it nor “fully supported [it] by facts” that “were either pleaded or tried by consent.” *Id.* at 264–65 (citation omitted).

## ORDER AND JUDGMENT

Now, therefore, this Court rules as follows:

- a. The Court **DISMISSES** this case for want of a justiciable controversy.
- b. Alternatively, the Court enters judgment in favor of the State on all counts of the First Amended Petition for Declaratory Judgment and Injunctive Relief.
- c. The Court **DENIES** all relief requested in the First Amended Petition.
- d. To the extent any motions or claims for relief remain outstanding and are not addressed herein, those motions or claims for relief are **DENIED**.
- e. All prior rulings are **INCORPORATED HEREIN BY REFERENCE** to the extent necessary to create a final and appealable order.
- f. Costs are **TAXED** to Plaintiff.
- g. This is the final order and judgment of this Court.

**SO ORDERED** on this \_\_\_\_ day of \_\_\_\_\_, 202\_\_.

---

The Honorable Christopher K. Limbaugh

Y TKV"

GZJ KDKV'52

IN THE CIRCUIT COURT OF COLE COUNTY, MISSOURI

PEOPLE NOT POLITICIANS, *et al.*, )  
 )  
 Plaintiffs, )  
 )  
 v. ) Case No. 25AC-CC07128  
 )  
 MISSOURI SECRETARY OF STATE, )  
 )  
 Defendant, )  
 )  
 and )  
 )  
 PUT MISSOURI FIRST, )  
 )  
 Intervenor. )

### PROPOSED JUDGMENT

This Court called the above-captioned case. Plaintiffs were represented by counsel Chuck Hatfield and Greta Bax. Defendant was represented by counsel Bill Seidleck and Jacqueline Bryant. Intervenor was represented by counsel Marc Ellinger and Stephanie Bell.

Intervenor's Motion for Sanctions was taken up and taken under advisement. Plaintiffs were subject to this Court's Order compelling them to provide documents responsive to Intervenor's Requests for Production of Documents issued on December 4, 2025. Plaintiffs not only failed to produce documents but intentionally advised Intervenor that such documents would be filed with the Secretary of State and that Intervenor could obtain records from the Secretary in the ordinary course of business later in the week. At the hearing, Counsel for Plaintiffs advised that they would eventually produce such documents and further advised that they had filed a Petition for a Writ of Prohibition related to this Court's Order. At this point, no Writ has been



issued by the Court of Appeals. Accordingly, this Court sustains Intervenor's Motion for Sanctions and, pursuant to Rule 61.01(b), strikes Plaintiffs' pleadings. Since those pleadings are stricken, this Court finds that no relief may be granted and thus enters Judgment in favor of the Intervenor and Defendant and against Plaintiffs.

Previously, Intervenor and Defendant filed Motions to Dismiss Plaintiffs' First Amended Petition. This Court heard arguments on those Motions on December 4, 2025, and took them under advisement. This Court now takes up those Motions and determines that the Motions are well-taken. Plaintiffs' claims in Count I of their Amended Petition are moot and are dismissed with prejudice. Plaintiffs' claims in Count II of their Amended Petition fail to state a justiciable claim upon which relief may be granted as they are not ripe for adjudication. Until Defendant makes a final determination as to the sufficiency or insufficiency of any of the referendum petitions, there is no claim properly before this Court. After such decision by the Defendant, Plaintiffs, if aggrieved, can seek their sole and exclusive remedy: judicial review under Section 116.200, RSMo.

In the interests of judicial efficiency and economy, this Court addresses the merits of Plaintiffs' Amended Petition.

### PROCEEDINGS

Plaintiffs offered an Amended Joint Stipulation of Facts and Exhibits, incorporating 15 exhibits, which was admitted by this Court. Plaintiffs offered an earlier Joint Stipulation of Facts and Exhibits which to which Intervenor objected, and specifically objected as to paragraphs 23, 29, and 32. This Court admitted the earlier Joint Stipulation over the objection. As no evidence was adduced to substantiate those paragraphs, the Court gives them no weight.

This Court heard testimony from Chrissy Peters, the Election Director for the Missouri Secretary of State. Argument was taken, and the case was submitted.

## FACTS

People Not Politicians is a campaign committee organized in the State of Missouri. Amended Joint Stipulation of Facts and Exhibits (“Am.Stip.”), ¶1. Richard von Glahn is a Missouri citizen, resident of St. Louis County, a taxpayer, and qualified voter in the State of Missouri. Am.Stip., ¶2. Richard von Glahn is the proponent of the referendum petitions 2026-R001; 2026-R002; 2026-R003; and 2026-R004. Am.Stip., ¶3. Denny Hoskins is the Missouri Secretary of State. Am.Stip., ¶4. Intervenor Put Missouri First is a political action committee organized in Missouri and an opponent to the referendum petitions. Verified Motion to Intervene.

On September 12, 2025, the Missouri General Assembly “truly agreed and finally passed” House Bill 1. Am.Stip., ¶6. Richard von Glahn submitted two referendum petition sample sheets (2026-R001 and 2026-R002) to the Secretary of State’s Office on September 12, 2025, seeking a referendum on House Bill 1. Am.Stip., ¶9 and Ex. 4, 5. Richard von Glahn submitted a third referendum petition sample sheet (2026-R003) to the Secretary of State’s Office on September 15, 2025. Am.Stip., ¶16 and Ex. 8. On September 26, 2025, the Secretary of State rejected Richard von Glahn’s referendum petition sample sheets (2026-R001, 2026-R002, and 2026-R003) as to form. Am.Stip., ¶22. Those rejections were based on an opinion letter issued by Attorney General Catherine Hanaway. Ex. 11.

Governor Mike Kehoe signed House Bill 1 (2025) on September 28, 2025. Am.Stip., ¶24. On September 29, 2025, Richard von Glahn submitted a fourth referendum petition sample sheet (2026-R004) to the Secretary of State’s

Office. Am.Stip., ¶25 and Ex. 12. On October 14, 2025, the Secretary of State approved the fourth referendum petition sample sheet as to form (2026-R004). Am.Stip., ¶27 and Ex. 13.

Referendum petitions on House Bill 1 have been circulated for signatures. Am.Stip., ¶32. No signed referendum petitions have been submitted to the Secretary of State regarding House Bill 1. Am.Stip., ¶33.

If petitions are submitted, the Secretary's office will follow its normal signature verification process on any such submitted petitions. TR.50:25-51:2. No final decision has been made on the sufficiency or insufficiency of the four referendum petitions. Tr.50:21-24. The Secretary has not issued a certificate of sufficiency or insufficiency on any of the four referendum petitions. Tr.49:19-22. The Secretary has not rejected any signatures on any of the four referendum petitions. Tr.49:23-24.

### COUNT I

With respect to Count I, the Secretary's review of the form of a petition necessarily entails determining if the subject matter of a petition is an eligible basis for a petition. If a petition were filed to seek a referendum on a bill that was already in effect, such as pursuant to an emergency clause from a prior year's session (e.g. 2024), there can be no referendum called. Similarly, if a referendum petition was sought on a bill that never passed the General Assembly that would not be a valid petition as to form.

Here the first three versions of the referendum petition (numbers 2026-R001, 2026-R002, and 2026-R003) were all submitted prior to the Governor signing House Bill 1. Until a bill, passed by the General Assembly, is signed by the Governor there is no law on which a referendum could be called. The premature filing of the referendum petition versions prior to the Governor's

signature removes entirely a constitutional power of the Governor under Article III, Section 31 of the Missouri Constitution (to approve, veto or take no action on a bill).

The Secretary had a threshold obligation to review the form of the petition and determine if it met with the referendum petition requirements. Section 116.120, RSMo, requires such a review. For an initiative petition, that petition could be rejected for failure to underline new text or strike out old text. See Section 116.050, RSMo. That form review necessarily involves a review of what is attached (the language or a bill). If Petitioners had omitted a page of House Bill 1, the Secretary could reject under Section 116.050, RSMo. The Secretary can therefore determine if a law has been signed by the Governor and not yet subject to the referendum clause of the Missouri Constitution.

This Court finds that the Secretary had the authority and the obligation to reject petitions 2026-R001, 2026-002, and 2026-R003. All relief, which solely relies on the Secretary's authority, requested in Count I is denied.

## COUNT II

This Court heard testimony that not one signature has been rejected by the Secretary. Further, that those decisions will only be made at the time a Certificate of Sufficiency or Insufficiency is issued by the Secretary. To compel the Secretary to count signatures at this point would be premature. There is no dispute that the Petitioners or their agents have circulated the petitions for signatures. Once those signature pages are submitted, there is a verification process established under Sections 116.120 and 116.130, RSMo. Only after that process can the Secretary make any determination of whether the signatures are sufficient to call a referendum election.

This Court finds that based on the evidence presented in the Amended Joint Stipulation and the testimony of Chrissy Peters and also on the arguments and the law, that no decision has been made about individual signatures counting or not counting. A decision on those signatures is premature. It is entirely possible that Plaintiffs will obtain a sufficient number of valid signatures which were obtained after the approval as to form of the referendum petition on October 14, 2025. If that occurs, then Count II would be moot.

Plaintiffs did not put on any evidence that without this Court acting on Count II the referendum petition would fail to be sufficient. It is Plaintiffs' burden to prove this fact and they have not attempted, much less succeeded, in doing so.

Finally, if the Secretary rejects any of the signatures for any reason, including the date of such signatures, causing the referendum to be insufficient, Plaintiffs have an express and guaranteed statutory remedy to bring an action against the Secretary under Section 116.200, RSMo. This is the process that must be followed and this Court will not undertake that process now, when it is not necessary and may never be necessary.

This Court finds that Plaintiffs have no cause of action under Count II at this time and further that they have failed to carry their burden of proof to show actual harm absent relief under Count II. Accordingly, the relief under Count II is denied.

### **ORDER AND JUDGMENT**

This Court hereby orders and adjudges that Plaintiffs are not entitled to relief on their First Amended Petition as to Counts I or II. All relief is therefore denied.



So ORDERED and ADJUDGED this \_\_\_\_\_ day of December 2025.

Honorable Christopher K. Limbaugh  
Judge, Division 4



Court Document Not an Official Court Document Not an Official Court Document Not an O  
Official Court Document Not an Official Court Document Not an Official Court Document  
t Not an Official Court Document Not an Official Court Document Not an Official Court Do  
Document Not an Official Court Document Not an Official Court Document Not an Official  
al Court Document Not an Official Court Document Not an Official Court Document Not an  
an Official Court Document Not an Official Court Document Not an Official Court Document  
nt Not an Official Court Document Not an Official Court Document Not an Official Court D  
t Document Not an Official Court Document Not an Official Court Document Not an Official  
cial Court Document Not an Official Court Document Not an Official Court Document Not  
ot an Official Court Document Not an Official Court Document Not an Official Court Docum  
ent Not an Official Court Document Not an Official Court Document Not an Official Court  
ut Document Not an Official Court Document Not an Official Court Document Not an Offic  
ficial Court Document Not an Official Court Document Not an Official Court Document Not  
ot an Official Court Document Not an Official Court Document Not an Official Court Docum  
ment Not an Official Court Document Not an Official Court Document Not an Official Cou  
urt Document Not an Official Court Document Not an Official Court Document Not an Offi  
Official Court Document Not an Official Court Document Not an Official Court Document N  
Not an Official Court Document Not an Official Court Document Not an Official Court Docu

# WRIT EXHIBIT 33

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Adair County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	166
2. Number of signatures found valid as "RDA"	7
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>173</b>
4. Number of Signatures found invalid as "NR"	5
5. Number of Signatures found invalid as "WA"	2
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>7</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>180</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Andrew County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Atchison County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	46
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>46</b>
4. Number of Signatures found invalid as "NR"	1
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>1</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>47</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Audrain County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	256
2. Number of signatures found valid as "RDA"	22
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>278</b>
4. Number of Signatures found invalid as "NR"	53
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	4
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>57</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>335</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Barry County

#### U.S. Representative District 7

1. Number of Signatures found valid as "R"	365
2. Number of signatures found valid as "RDA"	12
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>377</b>
4. Number of Signatures found invalid as "NR"	68
5. Number of Signatures found invalid as "WA"	3
6. Number of Signatures found invalid as "WS"	17
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>88</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>465</b>



County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Barton County

#### U.S. Representative District 4

1. Number of Signatures found valid as "R"	109
2. Number of signatures found valid as "RDA"	1
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>110</b>
4. Number of Signatures found invalid as "NR"	12
5. Number of Signatures found invalid as "WA"	3
6. Number of Signatures found invalid as "WS"	4
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>19</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>129</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Bates County

#### U.S. Representative District 4

1. Number of Signatures found valid as "R"	141
2. Number of signatures found valid as "RDA"	5
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>146</b>
4. Number of Signatures found invalid as "NR"	13
5. Number of Signatures found invalid as "WA"	2
6. Number of Signatures found invalid as "WS"	3
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>18</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>164</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Benton County

#### U.S. Representative District 4

1. Number of Signatures found valid as "R"	201
2. Number of signatures found valid as "RDA"	2
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>203</b>
4. Number of Signatures found invalid as "NR"	16
5. Number of Signatures found invalid as "WA"	1
6. Number of Signatures found invalid as "WS"	12
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>29</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>232</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Bollinger County

#### U.S. Representative District 8

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\pauls

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Boone County

#### U.S. Representative District 3

1. Number of Signatures found valid as "R"	7072
2. Number of signatures found valid as "RDA"	597
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>7669</b>
4. Number of Signatures found invalid as "NR"	1628
5. Number of Signatures found invalid as "WA"	243
6. Number of Signatures found invalid as "WS"	17
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>1888</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>9557</b>

#### U.S. Representative District 4

1. Number of Signatures found valid as "R"	8077
2. Number of signatures found valid as "RDA"	613
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>8690</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	18
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>18</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>8708</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Buchanan County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	443
2. Number of signatures found valid as "RDA"	12
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>455</b>
4. Number of Signatures found invalid as "NR"	27
5. Number of Signatures found invalid as "WA"	2
6. Number of Signatures found invalid as "WS"	4
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>33</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>488</b>



County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Butler County

#### U.S. Representative District 8

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Caldwell County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	31
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>31</b>
4. Number of Signatures found invalid as "NR"	6
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	1
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>7</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>38</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Callaway County

#### U.S. Representative District 3

1. Number of Signatures found valid as "R"	759
2. Number of signatures found valid as "RDA"	3
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>762</b>
4. Number of Signatures found invalid as "NR"	235
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	14
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>249</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>1011</b>

County: All  
Username: SOS\pauls

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Camden County

#### U.S. Representative District 3

1. Number of Signatures found valid as "R"	89
2. Number of signatures found valid as "RDA"	3
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>92</b>
4. Number of Signatures found invalid as "NR"	34
5. Number of Signatures found invalid as "WA"	1
6. Number of Signatures found invalid as "WS"	1
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>36</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>128</b>

#### U.S. Representative District 4

1. Number of Signatures found valid as "R"	243
2. Number of signatures found valid as "RDA"	4
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>247</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	6
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>6</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>253</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Cape Girardeau County

#### U.S. Representative District 8

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Carroll County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>



County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Carter County

#### U.S. Representative District 8

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Cass County

#### U.S. Representative District 4

1. Number of Signatures found valid as "R"	4217
2. Number of signatures found valid as "RDA"	171
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>4388</b>
4. Number of Signatures found invalid as "NR"	691
5. Number of Signatures found invalid as "WA"	8
6. Number of Signatures found invalid as "WS"	175
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>874</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>5262</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Cedar County

#### U.S. Representative District 4

1. Number of Signatures found valid as "R"	122
2. Number of signatures found valid as "RDA"	2
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>124</b>
4. Number of Signatures found invalid as "NR"	9
5. Number of Signatures found invalid as "WA"	12
6. Number of Signatures found invalid as "WS"	3
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>24</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>148</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Chariton County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Christian County

#### U.S. Representative District 7

1. Number of Signatures found valid as "R"	1830
2. Number of signatures found valid as "RDA"	71
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>1901</b>
4. Number of Signatures found invalid as "NR"	213
5. Number of Signatures found invalid as "WA"	27
6. Number of Signatures found invalid as "WS"	28
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>268</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>2169</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Clark County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>



County: All  
Username: SOS\paulas

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Clay County

#### U.S. Representative District 5

1. Number of Signatures found valid as "R"	1844
2. Number of signatures found valid as "RDA"	58
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>1902</b>
4. Number of Signatures found invalid as "NR"	158
5. Number of Signatures found invalid as "WA"	47
6. Number of Signatures found invalid as "WS"	55
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>260</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>2162</b>

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	1366
2. Number of signatures found valid as "RDA"	39
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>1405</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	49
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>49</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>1454</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Clinton County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Cole County

#### U.S. Representative District 3

1. Number of Signatures found valid as "R"	2644
2. Number of signatures found valid as "RDA"	124
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>2768</b>
4. Number of Signatures found invalid as "NR"	422
5. Number of Signatures found invalid as "WA"	52
6. Number of Signatures found invalid as "WS"	57
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>531</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>3299</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Cooper County

#### U.S. Representative District 3

1. Number of Signatures found valid as "R"	460
2. Number of signatures found valid as "RDA"	32
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>492</b>
4. Number of Signatures found invalid as "NR"	72
5. Number of Signatures found invalid as "WA"	13
6. Number of Signatures found invalid as "WS"	7
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>92</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>584</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Crawford County

#### U.S. Representative District 3

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Dade County

#### U.S. Representative District 4

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>



County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Dallas County

#### U.S. Representative District 4

1. Number of Signatures found valid as "R"	144
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>144</b>
4. Number of Signatures found invalid as "NR"	49
5. Number of Signatures found invalid as "WA"	2
6. Number of Signatures found invalid as "WS"	19
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>70</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>214</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Daviess County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	62
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>62</b>
4. Number of Signatures found invalid as "NR"	1
5. Number of Signatures found invalid as "WA"	3
6. Number of Signatures found invalid as "WS"	4
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>8</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>70</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### De Kalb County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	1
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>1</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>1</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Dent County

#### U.S. Representative District 8

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Douglas County

#### U.S. Representative District 8

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Dunklin County

#### U.S. Representative District 8

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>



County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Franklin County

#### U.S. Representative District 2

1. Number of Signatures found valid as "R"	912
2. Number of signatures found valid as "RDA"	22
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>934</b>
4. Number of Signatures found invalid as "NR"	158
5. Number of Signatures found invalid as "WA"	13
6. Number of Signatures found invalid as "WS"	9
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>180</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>1114</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Gasconade County

#### U.S. Representative District 3

1. Number of Signatures found valid as "R"	111
2. Number of signatures found valid as "RDA"	2
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>113</b>
4. Number of Signatures found invalid as "NR"	16
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>16</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>129</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Gentry County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Greene County

#### U.S. Representative District 7

1. Number of Signatures found valid as "R"	7856
2. Number of signatures found valid as "RDA"	456
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>8312</b>
4. Number of Signatures found invalid as "NR"	1130
5. Number of Signatures found invalid as "WA"	118
6. Number of Signatures found invalid as "WS"	271
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>1519</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>9831</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Grundy County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Harrison County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>



County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Henry County

#### U.S. Representative District 4

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Hickory County

#### U.S. Representative District 4

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Holt County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	1
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>1</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>1</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Howard County

#### U.S. Representative District 4

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Howell County

#### U.S. Representative District 8

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Iron County

#### U.S. Representative District 8

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>



County: All  
Username: SOS\pauls

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Jackson County

#### U.S. Representative District 4

1. Number of Signatures found valid as "R"	5477
2. Number of signatures found valid as "RDA"	157
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>5634</b>
4. Number of Signatures found invalid as "NR"	4053
5. Number of Signatures found invalid as "WA"	26
6. Number of Signatures found invalid as "WS"	170
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>4249</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>9883</b>

#### U.S. Representative District 5

1. Number of Signatures found valid as "R"	20696
2. Number of signatures found valid as "RDA"	1427
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>22123</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	594
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>594</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>22717</b>

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	221
2. Number of signatures found valid as "RDA"	24
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>245</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	6
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>6</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
11. Total Number of Signatures Checked (add 3 and 7-10)	251

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Jasper County

#### U.S. Representative District 7

1. Number of Signatures found valid as "R"	4617
2. Number of signatures found valid as "RDA"	624
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>5241</b>
4. Number of Signatures found invalid as "NR"	1275
5. Number of Signatures found invalid as "WA"	19
6. Number of Signatures found invalid as "WS"	62
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>1356</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>6597</b>

County: All  
Username: SOS\pauls

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Jefferson County

#### U.S. Representative District 3

1. Number of Signatures found valid as "R"	1363
2. Number of signatures found valid as "RDA"	41
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>1404</b>
4. Number of Signatures found invalid as "NR"	341
5. Number of Signatures found invalid as "WA"	37
6. Number of Signatures found invalid as "WS"	15
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>393</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>1797</b>

#### U.S. Representative District 8

1. Number of Signatures found valid as "R"	2330
2. Number of signatures found valid as "RDA"	104
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>2434</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	42
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>42</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>2476</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Johnson County

#### U.S. Representative District 4

1. Number of Signatures found valid as "R"	819
2. Number of signatures found valid as "RDA"	47
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>866</b>
4. Number of Signatures found invalid as "NR"	322
5. Number of Signatures found invalid as "WA"	5
6. Number of Signatures found invalid as "WS"	95
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>422</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>1288</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Kansas City County

#### U.S. Representative District 5

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>



County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Knox County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Laclede County

#### U.S. Representative District 4

1. Number of Signatures found valid as "R"	537
2. Number of signatures found valid as "RDA"	28
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>565</b>
4. Number of Signatures found invalid as "NR"	55
5. Number of Signatures found invalid as "WA"	5
6. Number of Signatures found invalid as "WS"	8
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>68</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>633</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Lafayette County

#### U.S. Representative District 4

1. Number of Signatures found valid as "R"	6
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>6</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>6</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Lawrence County

#### U.S. Representative District 7

1. Number of Signatures found valid as "R"	510
2. Number of signatures found valid as "RDA"	27
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>537</b>
4. Number of Signatures found invalid as "NR"	83
5. Number of Signatures found invalid as "WA"	20
6. Number of Signatures found invalid as "WS"	37
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>140</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>677</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Lewis County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	40
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>40</b>
4. Number of Signatures found invalid as "NR"	1
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>1</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>41</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Lincoln County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	825
2. Number of signatures found valid as "RDA"	17
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>842</b>
4. Number of Signatures found invalid as "NR"	114
5. Number of Signatures found invalid as "WA"	24
6. Number of Signatures found invalid as "WS"	21
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>159</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>1001</b>



County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Linn County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	56
2. Number of signatures found valid as "RDA"	1
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>57</b>
4. Number of Signatures found invalid as "NR"	10
5. Number of Signatures found invalid as "WA"	1
6. Number of Signatures found invalid as "WS"	2
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>13</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>70</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Livingston County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	84
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>84</b>
4. Number of Signatures found invalid as "NR"	6
5. Number of Signatures found invalid as "WA"	1
6. Number of Signatures found invalid as "WS"	2
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>9</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>93</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Macon County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	63
2. Number of signatures found valid as "RDA"	4
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>67</b>
4. Number of Signatures found invalid as "NR"	6
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	3
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>9</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>76</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Madison County

#### U.S. Representative District 8

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Maries County

#### U.S. Representative District 3

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Marion County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	135
2. Number of signatures found valid as "RDA"	3
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>138</b>
4. Number of Signatures found invalid as "NR"	8
5. Number of Signatures found invalid as "WA"	3
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>11</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>149</b>



County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### McDonald County

#### U.S. Representative District 7

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Mercer County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Miller County

#### U.S. Representative District 3

1. Number of Signatures found valid as "R"	5
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>5</b>
4. Number of Signatures found invalid as "NR"	3
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>3</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>8</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Mississippi County

#### U.S. Representative District 8

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Moniteau County

#### U.S. Representative District 3

1. Number of Signatures found valid as "R"	150
2. Number of signatures found valid as "RDA"	6
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>156</b>
4. Number of Signatures found invalid as "NR"	17
5. Number of Signatures found invalid as "WA"	9
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>26</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>182</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Monroe County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>



County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Montgomery County

#### U.S. Representative District 3

1. Number of Signatures found valid as "R"	78
2. Number of signatures found valid as "RDA"	1
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>79</b>
4. Number of Signatures found invalid as "NR"	13
5. Number of Signatures found invalid as "WA"	1
6. Number of Signatures found invalid as "WS"	15
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>29</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>108</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Morgan County

#### U.S. Representative District 4

1. Number of Signatures found valid as "R"	132
2. Number of signatures found valid as "RDA"	3
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>135</b>
4. Number of Signatures found invalid as "NR"	10
5. Number of Signatures found invalid as "WA"	11
6. Number of Signatures found invalid as "WS"	5
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>26</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>161</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### New Madrid County

#### U.S. Representative District 8

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Newton County

#### U.S. Representative District 7

1. Number of Signatures found valid as "R"	243
2. Number of signatures found valid as "RDA"	12
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>255</b>
4. Number of Signatures found invalid as "NR"	39
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>39</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>294</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Nodaway County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Oregon County

#### U.S. Representative District 8

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>



County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Osage County

#### U.S. Representative District 3

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Ozark County

#### U.S. Representative District 8

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Pemiscot County

#### U.S. Representative District 8

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Perry County

#### U.S. Representative District 8

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Pettis County

#### U.S. Representative District 4

1. Number of Signatures found valid as "R"	20
2. Number of signatures found valid as "RDA"	2
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>22</b>
4. Number of Signatures found invalid as "NR"	4
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	1
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>5</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>27</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Phelps County

#### U.S. Representative District 8

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>



County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Pike County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Platte County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	1524
2. Number of signatures found valid as "RDA"	21
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>1545</b>
4. Number of Signatures found invalid as "NR"	62
5. Number of Signatures found invalid as "WA"	26
6. Number of Signatures found invalid as "WS"	9
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>97</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>1642</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Polk County

#### U.S. Representative District 4

1. Number of Signatures found valid as "R"	554
2. Number of signatures found valid as "RDA"	35
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>589</b>
4. Number of Signatures found invalid as "NR"	92
5. Number of Signatures found invalid as "WA"	4
6. Number of Signatures found invalid as "WS"	5
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>101</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>690</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Pulaski County

#### U.S. Representative District 4

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Putnam County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Ralls County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	47
2. Number of signatures found valid as "RDA"	2
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>49</b>
4. Number of Signatures found invalid as "NR"	3
5. Number of Signatures found invalid as "WA"	3
6. Number of Signatures found invalid as "WS"	2
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>8</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>57</b>



County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Randolph County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	425
2. Number of signatures found valid as "RDA"	17
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>442</b>
4. Number of Signatures found invalid as "NR"	112
5. Number of Signatures found invalid as "WA"	1
6. Number of Signatures found invalid as "WS"	32
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>145</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>587</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Ray County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	128
2. Number of signatures found valid as "RDA"	2
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>130</b>
4. Number of Signatures found invalid as "NR"	7
5. Number of Signatures found invalid as "WA"	3
6. Number of Signatures found invalid as "WS"	14
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>24</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>154</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Reynolds County

#### U.S. Representative District 8

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Ripley County

#### U.S. Representative District 8

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Saline County

#### U.S. Representative District 4

1. Number of Signatures found valid as "R"	415
2. Number of signatures found valid as "RDA"	12
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>427</b>
4. Number of Signatures found invalid as "NR"	33
5. Number of Signatures found invalid as "WA"	5
6. Number of Signatures found invalid as "WS"	7
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>45</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>472</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Schuyler County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	2
2. Number of signatures found valid as "RDA"	1
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>3</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>3</b>



County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Scotland County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	5
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>5</b>
4. Number of Signatures found invalid as "NR"	5
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	1
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>6</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>11</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Scott County

#### U.S. Representative District 8

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Shannon County

#### U.S. Representative District 8

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Shelby County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	9
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>9</b>
4. Number of Signatures found invalid as "NR"	3
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>3</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>12</b>

County: All  
Username: SOS\pauls

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### St. Charles County

#### U.S. Representative District 2

1. Number of Signatures found valid as "R"	3777
2. Number of signatures found valid as "RDA"	208
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>3985</b>
4. Number of Signatures found invalid as "NR"	1459
5. Number of Signatures found invalid as "WA"	335
6. Number of Signatures found invalid as "WS"	28
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>1822</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>5807</b>

#### U.S. Representative District 3

1. Number of Signatures found valid as "R"	13284
2. Number of signatures found valid as "RDA"	722
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>14006</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	116
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>116</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>14122</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### St. Clair County

#### U.S. Representative District 4

1. Number of Signatures found valid as "R"	53
2. Number of signatures found valid as "RDA"	4
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>57</b>
4. Number of Signatures found invalid as "NR"	6
5. Number of Signatures found invalid as "WA"	1
6. Number of Signatures found invalid as "WS"	2
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>9</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>66</b>



County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### St. Francois County

#### U.S. Representative District 8

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paulas

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### St. Louis County

#### U.S. Representative District 1

1. Number of Signatures found valid as "R"	14759
2. Number of signatures found valid as "RDA"	767
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>15526</b>
4. Number of Signatures found invalid as "NR"	5121
5. Number of Signatures found invalid as "WA"	91
6. Number of Signatures found invalid as "WS"	487
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>5699</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>21225</b>

#### U.S. Representative District 2

1. Number of Signatures found valid as "R"	22640
2. Number of signatures found valid as "RDA"	567
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>23207</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	727
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>727</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>23934</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### St. Louis City County

#### U.S. Representative District 1

1. Number of Signatures found valid as "R"	8621
2. Number of signatures found valid as "RDA"	564
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>9185</b>
4. Number of Signatures found invalid as "NR"	1520
5. Number of Signatures found invalid as "WA"	222
6. Number of Signatures found invalid as "WS"	229
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>1971</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>11156</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Ste. Genevieve County

#### U.S. Representative District 8

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Stoddard County

#### U.S. Representative District 8

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Stone County

#### U.S. Representative District 7

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>



County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Sullivan County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Taney County

#### U.S. Representative District 7

1. Number of Signatures found valid as "R"	1348
2. Number of signatures found valid as "RDA"	107
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>1455</b>
4. Number of Signatures found invalid as "NR"	279
5. Number of Signatures found invalid as "WA"	52
6. Number of Signatures found invalid as "WS"	78
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>409</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>1864</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Texas County

#### U.S. Representative District 8

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Vernon County

#### U.S. Representative District 4

1. Number of Signatures found valid as "R"	185
2. Number of signatures found valid as "RDA"	13
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>198</b>
4. Number of Signatures found invalid as "NR"	26
5. Number of Signatures found invalid as "WA"	3
6. Number of Signatures found invalid as "WS"	4
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>33</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>231</b>

County: All  
Username: SOS\paulas

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Warren County

#### U.S. Representative District 2

1. Number of Signatures found valid as "R"	322
2. Number of signatures found valid as "RDA"	6
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>328</b>
4. Number of Signatures found invalid as "NR"	57
5. Number of Signatures found invalid as "WA"	10
6. Number of Signatures found invalid as "WS"	11
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>78</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>406</b>

#### U.S. Representative District 3

1. Number of Signatures found valid as "R"	173
2. Number of signatures found valid as "RDA"	3
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>176</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	8
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>8</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>184</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Washington County

#### U.S. Representative District 3

1. Number of Signatures found valid as "R"	71
2. Number of signatures found valid as "RDA"	2
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>73</b>
4. Number of Signatures found invalid as "NR"	7
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>7</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>80</b>



County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Wayne County

#### U.S. Representative District 8

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\pauls

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Webster County

#### U.S. Representative District 4

1. Number of Signatures found valid as "R"	86
2. Number of signatures found valid as "RDA"	3
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>89</b>
4. Number of Signatures found invalid as "NR"	26
5. Number of Signatures found invalid as "WA"	5
6. Number of Signatures found invalid as "WS"	7
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>38</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>127</b>

#### U.S. Representative District 7

1. Number of Signatures found valid as "R"	46
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>46</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	1
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>1</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>47</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Worth County

#### U.S. Representative District 6

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

County: All  
Username: SOS\paules

## Signature Totals By County

Date: 03/05/2026  
Report No: PM-007

Petition Name: People Not Politicians

Petition Type: Referendum

### Wright County

#### U.S. Representative District 8

1. Number of Signatures found valid as "R"	0
2. Number of signatures found valid as "RDA"	0
<b>3. Total Number of Valid Signatures (add 1 and 2)</b>	<b>0</b>
4. Number of Signatures found invalid as "NR"	0
5. Number of Signatures found invalid as "WA"	0
6. Number of Signatures found invalid as "WS"	0
<b>7. Total Number of Invalid Signatures (add 4, 5 and 6)</b>	<b>0</b>
8. Total number of duplicate signatures	0
9. Total number of valid signatures - rejected pages	0
10. Total number of invalid signatures - rejected pages	0
<b>11. Total Number of Signatures Checked (add 3 and 7-10)</b>	<b>0</b>

#### Page Range(s):

2026-R004-001-031511 - 2026-R004-510-009429

Not an Official Court Document

Y TKV"

GZJ RDKV'54

Not an Official Court Document

# YTV!!!

# GZJ KDK'54

IN THE CIRCUIT COURT OF COLE COUNTY  
STATE OF MISSOURI

PEOPLE NOT POLITICIANS, *et al.*,

Plaintiffs,

v.

MISSOURI SECRETARY OF STATE  
DENNY HOSKINS,

Defendant.

Case No. 25AC-CC07128

**DEFENDANT'S OPPOSITION TO PLAINTIFFS' MOTION  
TO END ABEYANCE AND RENDER JUDGMENT**

**CATHERINE L. HANAWAY**  
*Missouri Attorney General*

**LOUIS J. CAPOZZI, III**  
*Solicitor General*

William J. Seidleck, #77794  
*Principal Deputy Solicitor General*

Graham D. Miller, #77656  
*Deputy Solicitor General*

Attorney General's Office  
815 Olive Street, Suite #200  
St. Louis, Missouri 63101

Telephone: (573) 301-5359

Fax: (573) 751-0774

William.Seidleck@ago.mo.gov

Graham.Miller@ago.mo.gov

*Attorneys for Defendant*



Court Document Not an Official Court Document Not an Official Court Document Not an Official Court Document

## TABLE OF CONTENTS

TABLE OF CONTENTS.....	i
TABLE OF AUTHORITIES.....	ii
INTRODUCTION .....	1
BACKGROUND.....	2
ARGUMENT.....	4
I. The number of signatures is still outstanding such that this controversy is not fit for judicial resolution.....	4
A. The predicates of this Court’s order remain unmet.....	4
B. Plaintiffs’ arguments to the contrary have already been considered and rejected by this Court.....	6
II. Plaintiffs show no new hardship meriting revisiting this Court’s Abeyance Order.....	8
A. Plaintiffs’ future hypothetical harm in other cases does not qualify as a hardship.....	8
B. There is no hardship for channeling Plaintiffs’ challenge into the statutory scheme.....	9
III. This Court should continue to hold this dispute in abeyance.....	10
CONCLUSION.....	11
CERTIFICATE OF SERVICE.....	13

Official Court Document Not an Official Court Document Not an Official Court Document Not an Official Court Document

Not an Official Court Document Not an Official Court Document Not an Official Court Document

ment Not an Official Court Document Not an Official Court Document Not an Official Court Document

urt Document Not an Official Court Document Not an Official Court Document Not an Official Court Document

Official Court Document Not an Official Court Document Not an Official Court Document Not an Official Court Document

Not an Official Court Document Not an Official Court Document Not an Official Court Document

## TABLE OF AUTHORITIES

Cases	Page(s)
<i>Abbott Labs. v. Gardner</i> , 387 U.S. 136 (1967).....	7
<i>ACLU of Mo. v. Ashcroft</i> , 577 S.W.3d 881 (Mo. App. W.D. 2019).....	2, 10
<i>Brinson v. Whittico</i> , 793 S.W.2d 632 (Mo. App. E.D. 1990).....	11
<i>Charron v. State</i> , 257 S.W.3d 147 (Mo. App. W.D. 2008).....	10
<i>Graves v. Mo. Dep't of Corr., Div. of Prob. and Parole</i> , 630 S.W.3d 769 (Mo. banc 2021).....	Passim
<i>Mo. Ass'n of Nurse Anesthetists, Inc. v. State Bd. of Registration for Healing Arts</i> , 343 S.W.3d 348 (Mo. banc 2011).....	8
<i>Mo. Soybean Ass'n v. Mo. Clean Water Comm'n</i> , 102 S.W.3d 10 (Mo. banc 2003).....	Passim
Statutes	
Mo. Const. art. III, § 52(a).....	4
Mo. Rev. Stat. § 116.130.....	3
Mo. Rev. Stat. § 116.140.....	4, 6
Mo. Rev. Stat. § 116.150.....	7, 9
Mo. Rev. Stat. § 116.200.....	2, 7, 10
Mo. Rev. Stat. § 116.332.....	3
Regulations	
15 C.S.R. § 30-15.020.....	3, 5, 6

## INTRODUCTION

Plaintiffs’ motion for this Court to lift its December abeyance order is long on gripes but short (once again) on substance. This Court wisely recognized that it need not resolve a hypothetical case. Nothing Plaintiffs say shows any more concrete basis for deciding this case now than was true in December. Indeed, Plaintiffs proclaim (at 8): “[T]he local election authorities have validated vastly more signatures than necessary for qualification in five congressional districts.” That’s exactly why this Court put this case on ice—a decision here may be entirely unnecessary. The fact that Plaintiffs are upset with irrelevant developments in other cases provides no basis for this Court to hasten a premature decision.

For starters, the Court properly decided to hold this case in abeyance “until the requisite number of signatures have been certified or up until enough signatures have been rejected so as to prevent plaintiffs’ referendum from appearing on the ballot.” Order at 1 (Dec. 12, 2025). Neither of those events have happened, so this case remains unfit for resolution. *See Mo. Soybean Ass’n v. Mo. Clean Water Comm’n*, 102 S.W.3d 10, 26 (Mo. banc 2003). Signature verification is ongoing and totals remain preliminary—the potential for an unnecessary decision on a delicate question of law remains just as true today as in December. *See Graves v. Mo. Dep’t of Corr., Div. of Prob. and Parole*, 630 S.W.3d 769, 773 (Mo. banc 2021).

Additionally, Plaintiffs cannot show that they face any hardship from having *this case* paused until signature validation is complete. *See id.* Their argued hardship is entirely speculative and hypothetical based on a chain of possibilities that *could* happen *if* the Secretary of State denies their referendum for insufficient

signatures. And they root their complaints of hardship in matters currently being litigated in *other cases*. See, e.g., Pls. Mot. at 16–17 (complaining about the *Purcell* Principle”). Mere tangential convenience for seeing this case decided provides no warrant for this Court to rule upon an abstract legal dispute based on future contingent events. Nor is this Court the proper forum for hearing issues pending before other courts.

Moreover, Plaintiffs’ contentions that the Court must decide this matter now or risk potentially preventing litigation later rings hollow. The statute plainly answers when Plaintiffs can challenge signature decisions: “After the secretary of state certifies a petition as sufficient or insufficient . . . .” See Mo. Rev. Stat. § 116.200.1. This statutory-directed method to challenge a determination and court review provides Plaintiffs the exact “remedy” for this kind of dispute. *ACLU of Mo. v. Ashcroft*, 577 S.W.3d 881, 897 (Mo. App. W.D. 2019). And Plaintiffs have not contested the constitutional application of this statute. That Plaintiffs have chosen to bring this dispute prematurely and outside this statute neither entitles them to judicial relief nor shows they face a hardship absent relief. This Court should continue to hold this case in abeyance per its December 12 Order.

### BACKGROUND

Plaintiffs filed a Petition challenging the Secretary of State’s rejection of their referendum petitions submitted before H.B. 1 was enacted and the Secretary’s decision not to count signatures collected prior to the referendum petition’s approval as to form. See generally First Am. Pet. The Court held trial on December 8, 2025.

The day after trial, Plaintiffs submitted their referendum petition to the Secretary of State's office. Plaintiffs submitted over 300,000 signatures. *See* Pls. Memo. on Status of Signature Verification Ex. A (Jan. 5, 2026). This Court ordered this case held in abeyance pending verification and counting of signatures. Order at 1 (Dec. 12, 2025).

The Secretary of State is currently conducting the signature verification as directed by statute. *See* Mo. Rev. Stat. § 116.130. The Secretary chose not to count signatures collected prior to his approval as to form of the referendum petition. Pls. Memo. on Status of Signature Verification Ex. C (Jan. 5, 2026); *see* Mo. Rev. Stat. § 116.332.1. This Court held a hearing on January 13, 2026 at which it decided to continue holding this case in abeyance.

The Secretary's signature verification is well underway with local election authorities counting signatures. The Secretary has made no determination as to the validity of any signatures. The numbers cited by Plaintiffs are merely preliminary counts—made *before* several mandatory steps in the statutory process. *See* Pls. Mot. to End Abeyance Ex. D (Mar. 6, 2026) (showing sufficient number of preliminarily validated signatures in only five of the necessary congressional districts). Among other things, before signatures can be finally deemed valid, local election authorities must still investigate any duplicate signatures or irregular signatures before certifying the total number of signatures to the Secretary of State. *See* 15 C.S.R. § 30-15.020. And once signatures are returned to the Secretary of State, steps remain in



the process. *See* Mo. Rev. Stat. § 116.140. Thus, the labor-intensive process of validating and counting signatures remains ongoing.

## ARGUMENT

This Court should (once again) reject Plaintiffs’ bid for a premature ruling in this case. Missouri courts “employ[] a two-fold test in ascertaining whether a controversy is ripe for judicial determination: (1) whether the issues presented are fit for judicial resolution, and (2) whether denying relief would create hardship for either party.” *Graves v. Mo. Dep’t of Corr., Div. of Prob. & Parole*, 630 S.W.3d 769, 773 (Mo. banc 2021). Plaintiffs’ claims meet neither of these conditions, so this Court should reject their effort to obtain a premature judgment.

### **I. The number of signatures is still outstanding such that this controversy is not fit for judicial resolution.**

#### **A. The predicates of this Court’s order remain unmet.**

This Court ordered this case be held in abeyance “until the requisite number of signatures have been certified or up until enough signatures have been rejected so as to prevent plaintiffs’ referendum from appearing on the ballot.” Order (Dec. 12, 2025). Plaintiffs acknowledge that neither of these triggers has been met. *See* Pls. Mot. at 8–9 (interpreting preliminary numbers as reflecting enough signatures for ballot qualification in “five congressional districts” and stating that the referendum petition “will clear the signature threshold in [sixth congressional district] when counting is complete”); *see also* Mo. Const. art. III, § 52(a) (requiring referendum petition to meet signature threshold “in each of two-thirds of the congressional



districts”). Thus, if Plaintiffs are proven correct, deciding whether Plaintiffs are entitled to have the signatures disputed here counted will become unnecessary.

Tellingly, Plaintiffs never squarely address the thresholds set in this Court’s order. Instead, they attempt to get around the order by (oddly) suggesting that they will prevail in the final count and that they want the disputed signatures counted too as mere insurance against speculative challenges to individual signatures. *See* Pls. Mot. at 8–9 (arguing that the signatures in the sixth congressional district “*will* clear the signature threshold . . . when counting is complete” (emphasis added)); *id.* at 16 (raising concern about challenges to signature validity). But these are the very future contingent events that make this dispute “speculative and hypothetical.” *Graves*, 630 S.W.3d at 773. That all of Plaintiffs’ reasons for wanting a decision today rely on an “if” tells this Court everything it needs to know. *See* Pls. Mot. at 14–17.

Moreover, the signature counts that Plaintiffs reference are preliminary. Plaintiffs’ Exhibit D shows the initial signature counts for each local election authority where the signatures are checked “against voter registration records and annotate[d].” 15 C.S.R. § 30-15.020(1). This step is still ongoing. *See* Pls. Mot. at 9 (listing “total number of valid signatures (*so far*)” (emphasis added)). The next step in this process is noting “duplicate signature[s]” and notifying the Secretary of State. 15 C.S.R. § 30-15.020(2). Notably, the preliminary signature totals list *zero* duplicate signatures for any local election authority. *See* Pls. Ex. D. Local election authorities must also review signatures for any other “apparent irregularities” and alert the Secretary of State of any such irregularities. 15 C.S.R. § 30-15.020(4). Only after

this is done will the local election authority “certify to the secretary of state . . . the total” of qualified signatures. 15 C.S.R. § 30-15.020(5). And after that, the Secretary still has the statutory authority to check the signatures. *See* Mo. Rev. Stat. § 116.140. Therefore, the total number of countable validated signatures for each congressional district is still nowhere close to being determined.

**B. Plaintiffs’ arguments to the contrary have already been considered and rejected by this Court.**

Plaintiffs never attempt to address the factual thresholds of this Court’s December 12 Order. Instead, Plaintiffs continue to make the same arguments they made at trial and in their Supplemental Brief in Support of Issuing Final Judgment (filed Jan. 12, 2026). As the Secretary detailed in his Status Hearing Brief (filed Jan. 12, 2026), Plaintiffs’ arguments remain unavailing. This Court has already considered these arguments, and there is no need for this Court to reconsider (or re-reconsider) them now.

Plaintiffs argue that the Secretary is “actively violating” Section 116.030.1(1) because he has not sent out nearly 17,000 signature pages collected before his approval as to form—making this “a ripe dispute.” Pls. Mot. at 13. But for all their handwringing, the Secretary has not made a final decision on pre-approval as to form signatures—the only final decision occurs when the Secretary issues a certificate respecting sufficiency per Section 116.150.<sup>1</sup> Moreover, no impact has been “felt in a

---

<sup>1</sup> The Secretary has preserved all referendum petition signatures filed in accordance with this Court’s order.

concrete way” by Plaintiffs. *Mo. Soybean Ass’n v. Mo. Clean Water Comm’n*, 102 S.W.3d 10, 26 (Mo. banc 2003). Simply put, there have been no legal “effects” stemming from the Secretary’s action, so it remains completely “hypothetical or speculative” whether these separated signatures are necessary for Plaintiffs to meet the signature threshold. *See id.* at 25–26. And Plaintiffs all but state that the signatures sent to local election authorities are enough to “clear the signature threshold[s].” Pls. Mot. at 8–9. Therefore, adjudication of this issue continues to be “premature” and risks deciding an abstract legal question without real-world consequences. *Mo. Soybean Ass’n*, 102 S.W.3d at 26.

Moreover, the question of signature validity is not “appropriate for judicial resolution.” *Id.* at 27 (citing *Abbott Labs. v. Gardner*, 387 U.S. 136, 149 (1967)). An issue so qualifies when the determination is “final,” presents a “purely legal” question, and “no further . . . proceedings [are] contemplated.” *Id.* Again, there is no final decision—the Secretary has not issued a certificate as to sufficiency or insufficiency. *See* Mo. Rev. Stat. § 116.150. But even assuming (contrary to Missouri law) that treatment of the disputed signatures qualifies as “final” and granting that whether those signatures are valid given their collection date presents a “purely legal” question, the statutory scheme for referendum petitions specifies “further . . . proceedings.” *Mo. Soybean Ass’n*, 102 S.W.3d at 27. Specifically, challenges to signature sufficiency or insufficiency occur “[a]fter the secretary of state certifies a petition.” Mo. Rev. Stat. § 116.200.1. And Plaintiffs readily acknowledge the possibility of such challenges here. *See* Pls. Mot. at 16. These further proceedings

illustrate why this issue is not currently fit for judicial resolution (to say nothing of the General Assembly's judgment about when challenges like this should happen).

## **II. Plaintiffs show no new hardship meriting revisiting this Court's Abeyance Order.**

### **A. Plaintiffs' future hypothetical harm in other cases does not qualify as a hardship.**

Delaying a decision not fit for judicial review does not qualify as a hardship—even if such delay may have downstream impacts on how Plaintiffs litigate other cases. A hardship occurs when plaintiffs face a “dilemma” to “comply or take a potentially more costly alternative of risking serious penalties.” *Mo. Ass'n of Nurse Anesthetists, Inc. v. State Bd. of Registration for Healing Arts*, 343 S.W.3d 348, 355 (Mo. banc 2011) (quotation omitted). Plaintiffs have identified no such “dilemma.” Instead, Plaintiffs complain about what could happen “[i]f the Secretary issues a certificate of insufficiency due to an insufficient number of valid signatures.” Pls. Mot. at 15 (emphasis added). Again, this is entirely “speculative and hypothetical.” *Graves*, 630 S.W.3d at 773. Plaintiffs compound this hypothetical with a chain of future events. *See* Pls. Mot. at 15–16 (detailing “possibilities” that could happen). And they especially worry about speculative impacts on litigating positions in cases involving what map must be used in the coming election. *See id.* at 16–17. But “more certain consequences” are required to show an actual hardship on Plaintiffs. *Graves*, 630 S.W.3d at 776. That the Secretary's rejection of pre-approval signatures may cause Plaintiffs difficulty in the future is not a “hardship.”

Moreover, Plaintiffs undermine any claim to facing a hardship by their insistence that they “will have more than enough signature [sic] to qualify” for the

ballot. Pls. Mot. at 15. If this is true, then there is no effectual relief that this Court can offer here.

Realizing their hardship arguments do not bear out, Plaintiffs shift to arguing about legal matters in other cases. They especially complain about the State invoking the *Purcell* principle in other proceedings. See Pls. Mot. at 16–17. But which congressional map is in place for the 2026 elections is an entirely separate issue from whether the Secretary properly rejected signatures gathered prior to approval—this case’s dispute. See First Am. Pet. (challenging rejection of referendum petition sample sheets, not which congressional map is in effect). Just as “[a] declaratory judgment is not a general panacea for all real and imaginary legal ills,” *Graves*, 630 S.W.3d at 773 (quoting *Mo. Soybean Ass’n*, 102 S.W.3d at 25), it likewise is not a mechanism for providing an “assist” to the pro-referendum position in other cases.

**B. There is no hardship for channeling Plaintiffs’ challenge into the statutory scheme.**

The General Assembly has provided Missourians a statutory scheme for referendum petition proponents to challenge the Secretary’s sufficiency determination—including signatures. See Mo. Rev. Stat. § 116.200.1. Plaintiffs face no hardship from being made to comply with the statutory scheme.

After the referendum petition is submitted to the Secretary, he “makes a determination on the sufficiency of the petition.” *Id.* § 116.150.1. But before the Secretary makes that final decision as to certifying a referendum petition itself, he must determine if the threshold signature requirement is met. See *id.* §§ 116.120–.140. Only after this verification process is complete and the Secretary declines to



certify a petition may “any citizen may apply to the circuit court of Cole County to compel [the Secretary] to reverse his decision.” *Id.* § 116.200.1. Requiring litigation to await the Secretary’s final determination as to a petition’s sufficiency ensures that courts (and dark-moneyed special interests) will not try to micromanage how the Secretary reviews a petition. *See ACLU of Mo. v. Ashcroft*, 577 S.W.3d 881, 893 (Mo. App. W.D. 2019) (describing how the statutes “reflect a calculated intent by the general assembly to balance procedural oversight of the referendum process with the people’s ability to meaningfully exercise the power of referendum”).

Therefore, the statutory scheme directs when and how the Plaintiffs may challenge the acceptance (or rejection) of signatures. This scheme provides a legal “remedy” to “compel the secretary of state to reverse a petition certification decision.” *Id.* at 897. There can be no disputing that the Secretary has not yet decided the referendum petition’s validity. *See* Mo. Rev. Stat. § 116.150. This Court may not use the request for declaratory relief as a “substitute for existing remedies.” *Charron v. State*, 257 S.W.3d 147, 153 (Mo. App. W.D. 2008) (quotation omitted). Therefore, the existence of this legal remedy illustrates that “further... proceedings [are] contemplated” and that Plaintiffs face no hardship by having their legal challenge comply with this statutory scheme. *Mo. Soybean Ass’n*, 102 S.W.3d at 27.

### **III. This Court should continue to hold this dispute in abeyance.**

Plaintiffs request that if this Court does not believe this matter is ripe, that this Court dismiss that matter so they can seek appellate review. *See* Pls. Mot. at 18–20. But because the lawsuit is premature, this Court “may either dismiss the lawsuit without prejudice or may allow the lawsuit to pend until ripe for



adjudication.” *Brinson v. Whittico*, 793 S.W.2d 632, 634 (Mo. App. E.D. 1990) (emphasis added). Given the ongoing signature review, it preserves judicial resources to have this Court continue holding this matter in abeyance until the matter is fit for resolution.

Plaintiffs also briefly aver that this case qualifies for the public interest exception to mootness. *See* Pls. Mot. at 20–21. First, this issue has already been thoroughly briefed for this Court. *See* Def. Pretrial Br. at 14–18 (filed Oct. 31, 2025); Pls. MTD Opp’n at 1–4 (filed Dec. 4, 2025). Second, Plaintiffs’ threadbare recital of the public interest exception elements here would not survive a motion to dismiss, much less convince the Court that its previous ruling was in error.

### CONCLUSION

For the foregoing reasons, the Court should continue to hold this case in abeyance.

Dated: March 16, 2026

Respectfully submitted,

**CATHERINE L. HANAWAY**

Missouri Attorney General

**LOUIS J. CAPOZZI, III**

*Solicitor General*

/s/ William J. Seidleck

William J. Seidleck, #77794

*Principal Deputy Solicitor General*

Graham D. Miller, #77656

*Deputy Solicitor General*

Attorney General's Office

815 Olive Street, Suite #200

St. Louis, Missouri 63101

Telephone: (573) 301-5359

Fax: (573) 751-0774

William.Seidleck@ago.mo.gov

Graham.Miller@ago.mo.gov

*Attorneys for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that, on March 16, 2026, the foregoing was filed on the Missouri CaseNet e-filing system, which will send notice to all counsel of record.

/s/ William J. Seidleck  
William J. Seidleck, #77794

Y TKV''

GZJ KDKV'55

IN THE CIRCUIT COURT OF COLE COUNTY, MISSOURI

PEOPLE NOT POLITICIANS, *et al.*, )

)

Plaintiffs, )

)

v. )

Case No. 25AC-CC07128

)

MISSOURI SECRETARY OF STATE, )

)

Defendants. )

**INTERVENOR'S RESPONSE TO PLAINTIFFS' MOTION TO END  
ABEYANCE AND RENDER JUDGMENT**

Intervenor respectfully asks this Court to deny Plaintiffs' Motion to End Abeyance and Render Judgment. The Court's decision on December 12, 2025, to hold this case in abeyance and its subsequent decisions to continue holding the case in abeyance are not erroneous, an abuse of discretion, or otherwise unjust as evinced by Plaintiffs' own pleadings and requested relief.

**A. The Abeyance was Lawful at Inception and Not an Abuse of Discretion**

"The term 'abeyance' means certain rights or conditions are 'in expectancy.' It clearly implies that the situation is not yet fully completed. When a matter is held in abeyance it is in a condition of being undetermined." *Savannah Place, Ltd. v. Heidelberg*, 164 S.W.3d 64, 66 (Mo. App. S.D. 2005) (citing *Bernyce Belitz v. City of Omaha, Nebraska*, 172 Neb. 36, 108 N.W.2d 421, 425 (1961)). Since Courts must be able to control and move their dockets, an abeyance may be challenged only as an abuse of discretion. *Shirrell v. Missouri Edison Co.*, 535 S.W.2d 446, 450 (Mo.1976).

Plaintiffs claim that the current abeyance is unique and that "no rule of procedure authoriz[es] an open-ended, indefinite abeyance of proceedings." *Plaintiffs Motion*, p. 17. This claim, however, ignores the terms of the current

abeyance. This is not an open-ended, indefinite abeyance, but one dependent on the outcome of a specific event that must occur before a certain deadline. Specifically, as Plaintiffs point out, the abeyance is only “until the requisite number of signatures have been certified or up until enough signatures have been rejected so as to prevent plaintiffs’ referendum from appearing on the ballot.” 12/12/2025 Order; Plaintiffs Motion, p. 5. Further, this cannot be “indefinite” because the Secretary of State must make such a decision before a statutorily imposed deadline. 116.150.3 RSMo.

This kind of abeyance, in wait for final administrative action, is not new nor even unique in Missouri law. See *Knapp v. Missouri Local Gov't Employees Ret. Sys.*, 738 S.W.2d 903, 910 (Mo. App. W.D. 1987). In *Knapp*, a lineman appealed the denial of his disability benefits request. *Id.* at 905. However, his petition was premature, as the City’s Board of Trustees had already decided to grant him an evidentiary hearing. *Id.* at 909. Accordingly, the parties stipulated to an abeyance until the decision of the evidentiary hearing was released. *Id.* In the Court’s review of when the Petition should be considered filed, it took no objection to the abeyance pending the agency’s administrative review. *Id.* Further, the Court held that this abeyance was sufficient to waive the defendants’ right to a motion to dismiss. *Id.* Accordingly, an abeyance in anticipation of an administrative decision is a perfectly valid usage. *Id.*

Further, a Court’s dismissal for lack of subject matter as opposed to an abeyance to figure out the justiciability of a question was ruled to be an abuse of discretion. *Logan v. Sho-Me Power Elec. Co-op.*, 122 S.W.3d 670, 683 (Mo. App. S.D. 2003).<sup>1</sup> In *Logan*, a worker was fatally electrocuted by a high-voltage optic cable. *Id.* at 673. In the Plaintiffs’ complaint, they alleged that the Contractor, Irby, and his employee in charge of the Plaintiff, Gorman,

---

<sup>1</sup> Abrogated on other grounds by *Burns v. Smith*, 214 S.W.3d 335 (Mo. 2007)



intentionally exposed Plaintiff to the hazard of electrocution. *Id.* After such, Plaintiffs asked the Division of Workers Compensation to find that the facts were, in fact, intentional and create a *Killian* cause of action to proceed directly against the employer in the Circuit Court of Camden County. *Id.* Plaintiffs then brought an action for wrongful death against Irby and Gorman. *Id.* Both moved to dismiss on the ground that the trial court lacked subject matter jurisdiction because the Workers' Compensation Act provided the exclusive remedy available for the death. *Id.* The trial court sustained the motions leading to the appeal. *Id.*

On appeal, Plaintiffs acknowledged that the question of whether an employer's acts were intentional or accidental lay solely with the Division of Workers' Compensation. *Id.* at 681. However, they contended that the administrative action and the wrongful death suit could be pending simultaneously. *Id.* They therefore argued that the trial court abused its discretion in granting the motion, as it should instead have held the wrongful death suit in abeyance until the Commission resolved the question of whether the death was accidental or intentional. *Id.* The Court agreed with the Plaintiffs and held "the trial court abused its discretion by dismissing Plaintiffs' suit against Irby and refusing to stay or hold in abeyance that count of Plaintiffs' petition until the Commission resolved the 'accident versus intentional act' issue. *Id.* at 683.

As in *Logan* and *Knapp*, the present case turns on the outcome of a pending administrative determination. Here, the question of mootness depends entirely on the Secretary of State's certification decision regarding the sufficiency of the petition signatures. Until that determination is made, the justiciability of Plaintiffs' claims cannot be definitively assessed. Plaintiffs' request that this Court dismiss the case based on potential mootness would

therefore require the Court to resolve a question that may be clarified—or entirely eliminated—by the Secretary of State’s statutory determination. Furthermore, a ruling on the pleadings would be equally improper. Because the administrative determination may imminently moot the claim, any adjudication on the pleadings would risk resolving an issue that may cease to exist before judgment is entered, rendering the opinion entirely advisory. Under these circumstances, and consistent with the reasoning articulated in *Logan*, the Court’s proper course is to maintain the action in abeyance until the Secretary of State completes the certification process; dismissal or adjudication on the pleadings before that determination would constitute an abuse of discretion.

B. Plaintiffs’ Claims Depend on a Future Action Which Would Otherwise Moot Their Claims

“This Court is obligated, either upon motion of a party or acting sua sponte, to examine an appeal for mootness because ‘[m]ootness implicates the justiciability of a controversy and is a threshold issue to appellate review.’” *Missouri Mun. League v. State*, 465 S.W.3d 904, 906 (Mo. 2015) (quoting *LeBeau v. Commissioners of Franklin County*, 459 S.W.3d 436, 438 (Mo. banc 2015)).

A cause of action is moot when the question presented for decision seeks a judgment upon some matter which, if the judgment was rendered, would not have any practical effect upon any then existing controversy. When an event occurs which renders a decision unnecessary, the appeal will be dismissed. And where an enactment supersedes the statute on which the litigants rely to define their rights, the appeal no longer represents an actual controversy, and the case will be dismissed as moot.

*Humane Society of United States v. State*, 405 S.W.3d 532, 535 (Mo. banc 2013)

(quoting *C.C. Dillon Co. v. City of Eureka*, 12 S.W.3d 322, 325 (Mo. banc 2000)).

“[A]n event rendering a decision unnecessary may occur at any point, including on appeal.” *Missouri Mun. League*, 465 S.W.3d at 906. “Even a case vital at inception of the appeal may be mooted by an intervenient event which so alters the position of the parties that any judgment rendered [merely becomes] a hypothetical opinion.” *State ex rel. Reed v. Reardon*, 41 S.W.3d 470, 473 (Mo. banc 2001).

Plaintiffs contend that a ruling in their favor would affect a present controversy because Defendant did not transmit the disputed signature pages to the local election authorities for verification. According to Plaintiffs, this alleged omission interferes with their ability to place their referendum before the voters. Petition ¶ 43. That claimed injury, however, is entirely contingent upon the outcome of the ongoing signature verification process.

Whether the disputed pages were transmitted to local election authorities will only have legal significance if the referendum ultimately fails to obtain the requisite number of valid signatures; ironically an assertion Plaintiffs vehement dispute.<sup>2</sup> If the petition receives sufficient signatures to qualify for the ballot even without the disputed sheets, then the alleged failure to transmit those pages will have had no effect on the referendum’s certification. In that circumstance, the controversy Plaintiffs assert would cease to exist because the referendum would be certified notwithstanding the challenged conduct.

Plaintiffs themselves frame the alleged harm as the hindrance of their “right to place a referendum before the voters.” Petition ¶ 43. But if the signature verification process ultimately confirms that the petition contains

---

<sup>2</sup> Plaintiff’s Motion affirmatively states that the referendum petition does have enough signatures without the signatures in question. *Plaintiffs’ Motion*, p. 6.

the statutorily required number of signatures, then that right will have been fully realized. At that point, Plaintiffs could not plausibly maintain that their right was hindered, because the referendum would appear on the ballot exactly as they seek.

Accordingly, the alleged injury identified by Plaintiffs is not presently concrete but instead depends entirely upon the yet-to-be-completed administrative determination of whether the petition contains sufficient valid signatures. If that determination confirms that the petition satisfies the statutory requirements, the claimed harm disappears entirely. The dispute therefore turns on a contingency that may imminently moot Plaintiffs' claim.

The *Knapp* case reinforces the abeyance due to mootness concerns. In *Knapp*, the initial suit was to challenge a disability denial. *Knapp*, 738 S.W.2d at 905. The City then offered the Plaintiff a hearing under its administrative procedure. *Id.* at 909. The case was held in abeyance by the trial court as completion of the hearing was required to exhaust remedies. *Id.* Conversely, it makes sense that the administrative hearing could have been resolved in the Plaintiff's favor, thereby mooting any claim.

Where there is a possibility of a claim being live or moot, under *Knapp*, abeyance is the proper status for a matter. This Court should maintain holding this case in abeyance pending the resolution of the process of signature verification and certification under Chapter 116, RSMO.

WHEREFORE Intervenor prays that this Court deny Plaintiffs' Motion and continue to hold the current matter in abeyance.

Respectfully submitted,

**ELLINGER BELL LLC**

By: /s/ Marc H. Ellinger

Marc H. Ellinger, #40828

Stephanie S. Bell, #61855

308 East High Street, Suite 300

Jefferson City, MO 65101

Telephone: (573) 750-4100

Facsimile: (314) 334-0450

E-mail: mellinger@ellingerlaw.com

E-mail: sbell@ellingerlaw.com

*Attorneys for Intervenors*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing was served via the Court's electronic filing system on March 16, 2026 on all parties of record.

/s/ Marc H. Ellinger



Y TKV"  
GZJ RDKV'56



IN THE CIRCUIT COURT OF COLE COUNTY

STATE OF MISSOURI

PEOPLE NOT POLITICIANS, et al.,

Plaintiffs,

vs.

Case No: 25AC-CC07128

MISSOURI SECRETARY OF STATE  
DENNY HOSKINS,

Defendant.

**NOTICE OF DEPOSITION OF CORPORATE DESIGNEE FOR OFFICE  
OF MISSOURI SECRETARY OF STATE**

TO: Counsel of Record

Plaintiffs People Not Politicians and Richard von Glahn hereby give notice that their attorneys will take the deposition of the Rule 57.03(b)(4) representative(s) for the Office of Missouri Secretary of State. The purpose of said deposition is to ascertain what the Secretary's Office is doing with the referendum signatures submitted by People Not Politicians and Richard von Glahn that are dated on and between September 15, 2025 and October 13, 2025 and that the Secretary did *not* send to local election authorities in connection with Plaintiffs' pending Motion to End Abeyance and Render Judgment.

The deposition will take place on March 24, 2026 at 9:00 a.m. at Stinson LLP, 230 West McCarty Street, Jefferson City, Missouri 65101, or such other location as may be agreed upon by the parties. The deposition will be recorded by stenographic means before persons authorized by law to administer oaths.

## **MATTERS UPON WHICH THE DEPONENT(S) WILL BE EXAMINED**

1. The status of the Secretary of State's review of signatures submitted by Plaintiffs dated on or between September 15, 2025 and October 13, 2025.
2. Whether the Secretary has also sent such signatures to local election authorities and, if not, the reason(s) why not.
3. The identity of the individuals conducting the review of signatures submitted by Plaintiffs dated on or between September 15, 2025 and October 13, 2025.
4. The Secretary of State's process for reviewing signatures submitted by Plaintiffs dated on or between September 15, 2025 and October 13, 2025.
5. The timeline of the Secretary of State's review of signatures submitted by Plaintiffs dated on or between September 15, 2025 and October 13, 2025.
6. Any documents related to the Secretary of State's review of signatures submitted by Plaintiffs dated on or between September 15, 2025 and October 13, 2025.
7. The estimated date of completion of the Secretary's review of signatures submitted by Plaintiffs dated on or between September 15, 2025 and October 13, 2025.

Respectfully submitted

**STINSON LLP**

/s/ Charles W. Hatfield

Charles W. Hatfield, MO No. 40363

Alexander C. Barrett, MO No. 68695

Alixandra S. Cossette, MO No. 68114

Greta M. Bax, MO No. 73354

230 West McCarty Street

Jefferson City, Missouri 65101

573.636.6263

573.636.6231 (Facsimile)

chuck.hatfield@stinson.com

alexander.barrett@stinson.com

alix.cossette@stinson.com

greta.bax@stinson.com

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 17th day of March, 2026, I electronically filed the foregoing with the Clerk of the Court via the Court's electronic filing system, which sent notification to all counsel of record.

/s/ Charles W. Hatfield

Attorney for Plaintiffs

Y TKV''

GZJ KDKV'57

IN THE CIRCUIT COURT OF COLE COUNTY  
STATE OF MISSOURI

PEOPLE NOT POLITICIANS, *et al.*,

Plaintiffs,

v.

MISSOURI SECRETARY OF STATE  
DENNY HOSKINS,

Defendant.

Case No. 25AC-CC07128

**DEFENDANT SECRETARY OF STATE'S MOTION TO QUASH**

Defendant Missouri Secretary of State, by and through counsel, moves to quash the notice of deposition of a corporate designee for the Secretary of State's Office. In support, Defendant's counsel states:

**INTRODUCTION**

At Plaintiffs' request, the Secretary of State agreed to try this case on stipulated facts. Plaintiffs did not seek discovery on how or when the Secretary would handle the signatures central to this dispute—despite having the opportunity to do so. And even after Intervenor's did not agree to the previously agreed upon Joint Stipulation, Plaintiffs maintained that this case could be tried on the stipulated facts and exhibits. At trial, they entered the joint exhibits and joint stipulations as exhibits and presented no further evidence. But now, after a full bench trial that happened over three months ago, Plaintiffs seek to depose

a corporate designee from the Secretary of State's Office about how the disputed pre-approval-as-to-form signatures are being processed. This Court should quash Plaintiffs' extraordinary notice of deposition for three reasons.

*First*, with respect to this present litigation, Plaintiffs are simply too late. The purpose of discovery is "to assist litigants in determining facts *prior to trial*." *State ex rel. Humane Soc'y v. Beetem*, 317 S.W.3d 669, 672 (Mo. App. W.D. 2010) (emphasis added). Hence, the process is often referred to as *pre-trial* discovery. But agitated by this Court's decision to hold this case in abeyance and wanting to hurry the Secretary's review process along (to reap benefits in *other pending disputes*), Plaintiffs now seek to conduct *post-trial* discovery. If this evidence were truly relevant for this case, then Plaintiffs should have sought discovery before trial instead of proposing to try this matter on stipulated facts. And even if this evidence were relevant (it's not—as Plaintiffs reaffirmed mere weeks ago), Plaintiffs made the litigation decision not to pursue discovery prior to trial. Decisions have consequences, and this Court should not allow Plaintiffs to circumvent their deliberate and repeated waiver.

*Second*, more broadly, Plaintiffs' efforts to investigate (and indeed second-guess) the manner in which the Secretary and local election officials are counting signatures is too early. Several relevant statutes unequivocally shield the Secretary and local election officials from outside special interests micromanaging the process. For one thing, the Secretary has until August 4, 2026 (or August 11, 2026 depending on when local election authorities finish their



review) to fulfill all statutory requirements and decide whether to certify the referendum petition. Mo. Rev. Stat. § 116.150.3. Moreover, a separate provision forecloses challenging the Secretary's ongoing review by requiring that any disputes about the review process await certification of "a petition as sufficient or insufficient." *Id.* § 116.200.1. Nothing entitles Plaintiffs to suggest here and now that these predicates be disregarded in favor of haste.

*Third*, Plaintiffs cross-examined a member of the Secretary of State's Office on many (if not all) of the matters over which they now seek post-trial discovery. At trial, Intervenors called Ms. Chrissy Peters, the Director of Elections from the Secretary of State's Office, as a witness. Plaintiffs extensively and repeatedly asked what would happen with the disputed signatures submitted to the Secretary of State's Office. Ms. Peters testified in detail about how these signatures would be separated from the post-approval signatures and not sent to the local election authorities for processing. That is exactly what happened—and this litigation has proceeded based on this understanding. *See* Pls. Memo. on Status of Signature Verification Ex. C (Jan. 5, 2026). But unsatisfied with this Court's decision to hold the case in abeyance and the Secretary's position (which the Secretary has maintained through this entire lawsuit and referendum process), Plaintiffs want to repeat their questions about what the Secretary is doing with the disputed signatures. This cumulative deposition request is nothing more than an attempt "annoy[], embarrass[], oppress[], or undu[ly]"

burden” the Secretary of State’s Office. Mo. Sup. Ct. R. 56.01(c). For all of these reasons, the Court should quash this post-trial discovery expedition.

## BACKGROUND

Plaintiffs filed a Petition challenging the Secretary of State’s rejection of their referendum petitions submitted before H.B. 1 was enacted and the Secretary’s decision not to count signatures collected prior to the referendum petition’s approval as to form. *See generally* First Am. Pet. The Court held trial on December 8, 2025.

The day after trial, Plaintiffs submitted their referendum petition to the Secretary of State’s Office. Plaintiffs submitted over 300,000 signatures. *See* Pls. Memo. on Status of Signature Verification Ex. A (Jan. 5, 2026). This Court ordered this case held in abeyance pending verification and counting of signatures. Order at 1 (Dec. 12, 2025).

The Secretary of State and local election officials across Missouri are currently conducting the signature verification as directed by statute. *See* Mo. Rev. Stat. § 116.130. The Secretary has said that signatures collected prior to his approval as to form of the referendum petition will not be counted. Pls. Memo. on Status of Signature Verification Ex. C (Jan. 5, 2026); *see* Mo. Rev. Stat. § 116.332.1. In response, Plaintiffs requested this Court to issue its judgment. *See* Pls. Suppl. Br. in Supp. of Issuing Final J. (Jan. 12, 2026). After a hearing, this Court continued to hold the case in abeyance. *See* Dkt. (Jan. 13, 2026). That was sensible and consistent with this Court’s prior order—because the parties still have no idea whether the signatures at issue in this case will make any difference

With the Secretary's signature verification underway and local election authorities counting signatures, Plaintiffs again moved for this Court to end the abeyance and issue a judgment. *See* Pls. Mot. (Mar. 6, 2026). As part of their motion, Plaintiffs cited preliminary signature counts from local election authorities suggesting a sufficient number of preliminary signatures in five of the six necessary congressional districts. *See* Pls. Mot. Ex. D (Mar. 6, 2026). These numbers are merely preliminary counts—made *before* several mandatory steps in the statutory process. Even after these initial counts, local election authorities must still investigate any duplicate or irregular signatures before certifying the total number of signatures to the Secretary. *See* 15 C.S.R. § 30-15.020. And once signatures are returned to the Secretary, steps remain in the process. *See* Mo. Rev. Stat. § 116.140. Thus, the labor-intensive process of validating and counting signatures remains ongoing. The Secretary has made no determination as to the validity of any signatures.

After a hearing about whether to end the abeyance on March 17, this Court continued the case to April 7. *See* Dkt. (Mar. 17, 2026). Unsatisfied with this Court's decision and the Secretary of State's signature-verification process, Plaintiffs served a notice of deposition later that afternoon. Plaintiffs seek to depose a corporate designee from the Secretary of State's Office.

### LEGAL STANDARD

Courts have “broad discretion” to control and manage discovery. *Hancock v. Shook*, 100 S.W.3d 786, 795 (Mo. banc 2003). Under Mo. Sup. Ct. R. 56.01(c), courts may enter protective orders prohibiting discovery “to protect a party or person from annoyance, embarrassment, oppression, or undue burden or

expense,” including “that discovery not be had.” *Accord State ex rel. Ford v. Messina*, 71 S.W.3d 602, 607 (Mo. banc 2002) (“A protective order should issue if annoyance, oppression, and undue burden and expense outweigh the need for discovery.”). If the party seeking a protective order shows “good cause” to limit discovery, the court may order that “certain matters not be inquired into, or that the scope of the discovery be limited to certain matters.” Mo. Sup. Ct. R. 56.01(c).

## ARGUMENT

### I. Plaintiffs’ notice of deposition is untimely.

#### A. Plaintiffs waived their right to discovery.

Defendants have good cause for opposing Plaintiffs’ discovery—Plaintiffs waived any right to seek it. Tellingly, discovery is often referred to as “pre-trial discovery.” *E.g., Igoe v. Dep’t of Labor and Indus. Rels.*, 210 S.W.3d 264, 267 (Mo. App. W.D. 2006). That is because “the purposes of discovery are to eliminate concealment and surprise, to assist litigants in determining facts *prior to trial*, and to provide litigants with access to proper information through which to develop their contentions and to present their sides of the issues as framed by the pleadings.” *State ex rel. Human Soc’y v. Beetem*, 317 S.W.3d 669, 672 (Mo. App. W.D. 2010) (emphasis added) (quoting *State ex rel. Woytus v. Ryan*, 776 S.W.2d 389, 391 (Mo. banc 1989)). Yet Plaintiffs now wish to conduct “post-trial discovery.”<sup>1</sup> Accordingly, this Court should quash Plaintiffs’ notice of deposition.

---

<sup>1</sup> The only use of the term “post-trial discovery” in civil cases of which the State is aware deals with the calculation of damages. *See, e.g., State ex rel. Bass Pro Outdoor World, LLC v. Schneider*, 302 S.W.3d 103, 107–08 (Mo. App. E.D. 2009); *State ex rel. Missouri-Nebraska Express, Inc. v. Jackson*, 876 S.W.2d 730, 735 (Mo. App. W.D.

For starters, discovery's purposes are not implicated here. This case has already been tried—on facts stipulated to *by Plaintiffs* no less. Now unsatisfied with this Court's decision to hold this case in abeyance, Plaintiffs have buyer's remorse and are attempting to re-open discovery. Plaintiffs are also transparently upset with developments in other cases regarding which map will be used this November. *See* Mot. to End Abeyance at 7–8, 16–17 (Mar. 6, 2026). If the testimony they now request were truly necessary for their claims *in this case* (it's not), Plaintiffs should have served discovery in the first instance.

But not only did Plaintiffs decline to serve discovery, *they* proposed and drafted the Joint Stipulation of Facts and Exhibits. And they are upset that local election officials are taking the statutorily allotted time to count the hundreds of thousands signatures they submitted; and they are apparently upset that the Secretary is not skipping steps in the statutory process, which includes a specific deadline by which the process must finish. *See* Mo. Rev. Stat. § 116.150.3. But Plaintiffs never challenged the validity of the Secretary's timeframe for determining the referendum petition's legal sufficiency. Thus, they have waived any ability to probe matters such as “[t]he timeline of the Secretary of State’s review of signatures.” Notice of Dep. at 2, ¶ 5 (Mar. 17, 2026).

In addition to agreeing to try this case on stipulated facts, Plaintiffs also rested with their presentation of evidence after entering the joint exhibits and joint stipulation. Tr. 23:17–19 (Dec. 8, 2025). Plaintiffs are not merely requesting

---

1994).



to “reopen their case at trial,” but apparently to re-open the case three months later. *In re Estate of Mapes*, 738 S.W.2d 853, 855 (Mo. banc 1987). This is not the situation where “the proof seems to be available” at trial and there would be no “inconvenience[] [to] the court or prejudice[] [to] the defendants.” *Id.* at 856. Rather, Plaintiffs’ post-trial discovery request “promises to be a fishing expedition.” See *State ex rel. Kander v. Green*, 462 S.W.3d 844, 852 (Mo. App. W.D. 2015). This Court should “decline [Plaintiffs’] invitation.” *Id.*

Compounding their waiver, Plaintiffs maintained—as of March 6, 2026—that “[t]he parties stipulated to all relevant facts” and “[n]othing else is needed to apply clear, binding Missouri case law and invalidate the Secretary’s unlawful decisions.” Pls. Mot. to End Abeyance at 12 (Mar. 6, 2026). Plaintiffs can’t have it both ways: They proffered a petition to this Court posing purely legal questions with stipulated facts. No more details about the Secretary’s present handling of the disputed signatures beyond those already present in the record are relevant to the claims raised. Instead, Plaintiffs are now seeking to use this case as a fishing expedition in hope of finding information to use against the Secretary elsewhere.

Nor has this Court’s decision to hold this case in abeyance somehow made the timing of the Secretary’s decision relevant to the merits of this case. The only issue here is the validity of the disputed signatures—not which map gets used in the upcoming election. The Secretary’s rendering a certification decision no later than August 4, 2026 (or August 11, 2026 depending on when local election



authorities finish their review) will not affect this Court's ability to issue a timely decision on merits—especially because all facts have been stipulated (or elicited in cross examination) and legal issues briefed.

Because Plaintiffs waived any argument or discovery in this case over *when* the Secretary would process the disputed signatures (or any signatures for that matter), they cannot now seek to reengineer their claims and reopen discovery post-trial. With no basis for seeking discovery, this notice of deposition therefore can serve only to “annoy[], embarrass[], oppress[], or undu[ly] burden” the Secretary of State. Mo. Sup. Ct. R. 56.01(c). The Court should instead enforce Plaintiffs’ waiver—which they reaffirmed mere weeks ago. *See* Pls. Mot. to End Abeyance at 12 (Mar. 6, 2026).

#### **B. Plaintiffs are not entitled to discovery.**

In seeking to litigate this case prematurely, Plaintiffs’ requests to investigate further the Secretary’s treatment of the disputed signatures is also too early. Missouri law (unchallenged by Plaintiffs here) establishes when litigants may seek review of how the Secretary undertook signature verification and counting.

As has been explained in prior filings, the Secretary has separated the signatures collected before his approval. *See* Pls. Memo. on Status of Signature Verification Ex. C at 1 (Jan. 5, 2026). Specifically, signatures collected on or before October 13, 2025 “will be in separate folders and placed in separate boxes and scanned in separately for processing.” *Id.* There is no final decision on these

signatures yet—the Secretary has not issued a certificate as to sufficiency or insufficiency. *See* Mo. Rev. Stat. § 116.150.

After the referendum petition is submitted to the Secretary, he “makes a determination on the sufficiency of the petition.” *Id.* § 116.150.1. But before the Secretary makes that final decision as to certifying a referendum petition, he has wide latitude regarding how he goes about verifying signatures. *See id.* §§ 116.120–.140. Only after this verification process is complete and the Secretary declines to certify a petition may “any citizen may apply to the circuit court of Cole County to compel [the Secretary] to reverse his decision.” *Id.* § 116.200.1. Requiring litigation to await the Secretary’s final determination as to a petition’s sufficiency ensures that courts (and outside special interests) will not attempt to micromanage how the Secretary reviews a petition. *See ACLU of Mo. v. Ashcroft*, 577 S.W.3d 881, 893 (Mo. App. W.D. 2019) (describing how the statutes “reflect a calculated intent by the general assembly to balance procedural oversight of the referendum process with the people’s ability to meaningfully exercise the power of referendum”).<sup>2</sup>

Therefore, the statutory scheme directs when and how the Plaintiffs may challenge the acceptance (or rejection) of signatures. This scheme provides a

---

<sup>2</sup> Plaintiffs have previously suggested that it would be impractical or impossible to litigate their claims after the Secretary’s certification decision—and hence this litigation should proceed now. Mot. to End Abeyance at 16 (Mar. 6, 2026). They’re wrong. The statute provides for expedited filing and consideration before this Court, Mo. Rev. Stat. § 116.200.1, and direct appeal to the Missouri Supreme Court within ten days, *id.* § 116.200.3. Hence, any argument that this Court cannot immediately decide the issues here (particularly in light of the already-existing record) after the Secretary’s certification decision has no basis.

legal “remedy” to “compel the secretary of state to reverse a petition certification decision.” *Id.* at 897. There can be no disputing that the Secretary has not yet decided the referendum petition’s validity. See Mo. Rev. Stat. § 116.150. Plaintiffs therefore have no entitlement to litigate—let alone seek discovery regarding—how the Secretary is now undertaking signature counting.

## **II. Plaintiffs’ noticed matters have been asked and answered.**

Even if they could rewind time and use their requested deposition as part of their presentation of evidence, Plaintiffs have already had the opportunity to examine the matters in their notice. Thus, this deposition request is needlessly cumulative.

At trial, Intervenors placed Chrissy Peters, the Director of Elections at the Secretary of State’s Office, on the witness stand, and Plaintiffs extensively cross-examined Ms. Peters. Again, if any of Plaintiffs’ matters were truly relevant for the merits of this case, Plaintiffs had the opportunity to ask these questions. That they may have chosen not to does not permit them to demand more answers now.

Moreover, Plaintiffs repeatedly probed many of these matters at trial.

Mr. Hatfield: [W]hat are you going to do if you get signature pages with signatures that are dated prior to the October 1[4]th approval letter, Exhibit 11?

Ms. Peters: So date of approval was October 1[4], so anything prior to that will be processed and put in a separate area to be scanned in later for preservation; and then those that have valid dates would then be scanned in and sent to the local election authorities for verification.

Mr. Hatfield: Okay. So if somebody signed the [referendum] petition before October 1[4]th . . . you’re not even going to check to see if they’re a registered voter[?]

Ms. Peters: We will scan them in and preserve them for review. And

I don't know what that review looks like at this time, sir . . . [W]e will just have it also scanned in for review. But at this point, the ones that we are sending to the local election authorities for verification during this time we will be processing, will be the ones that have – from our office's position, been determined to be collected on a valid date.

Mr. Hatfield: So the ones that you separated will not be sent to the local election authorities[?]

Ms. Peters: The ones that would have a date of a signature collected prior to October 1[4]th, based on our office's position that they're not valid, would be separated and not scanned in with the group that will be sent to the local election authorities for verification.

Tr. 80:11–82:3.

And again,

Mr. Hatfield: So you are going to review [a signature from before October 13th?]

Ms. Peters: It will be separated later for review at a separate time, not sent out to the local election authorities for verification if they're registered to vote or not registered to vote. So at this point, I can just say it's going to be separated and scanned in for review later.

Tr. 91:9–14.

Additionally, Intervenor asked Ms. Peters at trial what would happen if there are not enough signatures when just the post-approval signatures are counted. Tr. 89:3–6. Ms. Peters responded, “I would not know at this time what the action would be . . . [W]e will have to see where . . . we're at and I would confer with legal executive staff.” Tr. 89:7–10.

These are many, if not all, of the same matters Plaintiffs now wish to examine. See Notice of Dep. at 2. Plaintiffs wish to inquire as to the “status” of the review of pre-approval signatures, *id.* ¶ 1, whether the pre-approval

signatures have been “sent . . . to local election authorities and if not, . . . why not,” *id.* ¶ 2, the “process for reviewing” pre-approval signatures, *id.* ¶ 4; *see also id.* ¶ 3 (“identity” of reviewers); *id.* ¶ 6 (“documents related to . . . review”), and the “timeline” for review of the pre-approval signatures, *id.* ¶ 5; *see also id.* ¶ 7 (“estimated date of completion of . . . review”). As these questions and matters were asked and answered at trial, this requested deposition is cumulative. Based on its cumulative nature, this deposition serves only to “annoy[], embarrass[], oppress[], or undu[ly] burden” the Secretary of State’s Office. Mo. Sup. Ct. R. 56.01(c).

\* \* \*

Just a few weeks ago, Plaintiffs told this Court that “No Further Factual Development is Needed” in this case. Pls. Mot. to End Abeyance at 11 (Mar. 6, 2026). That is obviously correct. The Court should hold Plaintiffs to that representation, deny their attempt to undertake an inappropriate post-trial discovery fishing expedition, and continue holding this unripe case in abeyance.

### CONCLUSION

For the foregoing reasons, the Court should quash the notice of deposition.



Dated: March 23, 2026

Respectfully submitted,

**CATHERINE L. HANAWAY**

Missouri Attorney General

**LOUIS J. CAPOZZI, III**

*Solicitor General*

/s/ William J. Seidleck

William J. Seidleck, #77794

*Principal Deputy Solicitor General*

Graham D. Miller, #77656

*Deputy Solicitor General*

Attorney General's Office

815 Olive Street, Suite #200

St. Louis, Missouri 63101

Telephone: (573) 301-5359

Fax: (573) 751-0774

William.Seidleck@ago.mo.gov

Graham.Miller@ago.mo.gov

*Attorneys for Defendant*



CERTIFICATE OF SERVICE

I hereby certify that, on March 23, 2026, the foregoing was filed on the Missouri CaseNet e-filing system, which will send notice to all counsel of record.

/s/ William J. Seidleck  
William J. Seidleck, #77794