

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.)

AFFIDAVIT OF RICHARD VON GLAHN

COUNTY OF ST. LOUIS)

) ss.

STATE OF MISSOURI)

Richard von Glahn, being duly sworn, deposes and states as follows:

1. I am over the age of eighteen.

2. I have personal knowledge of the facts stated herein and make this affidavit on behalf of myself and People Not Politicians ("PNP") in support of Plaintiffs' Status Report on Signature Review.

3. I am the Executive Director of PNP, which submitted the referendum that is in dispute in the above-captioned litigation.

4. PNP, through circulators, began gathering signatures in support of the referendum petition at issue on September 15, 2025.

5. Between September 15, 2025 and October 14, 2025 (when the Secretary certified the referendum petition as to form), PNP gathered approximately 102,800 signatures.

6. PNP worked with its signature gatherers to ensure that each of them executed and filed the circulator affidavits required by § 116.080, RSMo with the Secretary of State.

7. On December 9, 2025, PNP filed 305,968 signatures in support of the referendum at issue with the Secretary of State. This included the roughly 102,800 signatures gathered between September 15 and October 14, 2025.

8. On December 9, 2025, the Secretary of State's Office issued PNP a receipt reflecting that it had filed these signatures and that they were contained in 691 boxes.

9. Attached hereto as Exhibit A is a true and correct copy of the receipt the Secretary of State's Office issued to PNP.

10. When signature pages were submitted on December 9, 2025, it was my and PNP's understanding that all of the signature pages PNP filed with the Secretary of State's Office on December 9, 2025 included the circulator affidavits required by § 116.080, RSMo, and substantially followed the form mandated by § 116.030, RSMo.

11. Attached hereto as Exhibit B is a true and correct copy of a sample signature page PNP submitted on December 9, 2025. All signature pages submitted were in the same format.

12. On January 5, 2026, the Secretary of State's Office notified PNP it had separated the signatures PNP filed based on whether signatures were dated before or after October 14, 2025.

13. Attached hereto as Exhibit C is a true and correct copy of a letter the Secretary of State's Office sent to PNP on January 5, 2026.

14. Attached hereto as Exhibit D is a true and correct copy of email correspondence between PNP and the Secretary's Office exchanged on January 5, 2026.

15. Based on the correspondence received on January 5, 2026, it is my and PNP's understanding that the Secretary of State's Office sent signature pages that contained signatures gathered both before and after October 14, 2025 to LEAs for processing.

16. Based on this same correspondence, it is my and PNP's understanding that the Secretary's Office did not send signature pages that exclusively contained signatures gathered before October 14, 2025 to LEAs for processing.

17. PNP estimates that the Secretary of State's Office did not send approximately 100,000 signatures to LEAs for processing.

18. Using the limited data provided to PNP by the Secretary of State's Office, PNP has estimated the total number of signatures the Secretary's Office sent to LEAs in each county (and therefore Congressional District) for processing. Using that estimate, PNP has further estimated the number of signatures remaining to be checked in each Congressional District (discussed below).

19. As the Secretary has posted preliminary reports on the status of signature checking by each LEA to his website, PNP has downloaded those

reports, tallied the total number of signatures each county LEA has determined to be valid, and tallied the total number of signatures each county LEA has checked.

20. This has allowed PNP to track the total number of signatures LEAs have deemed valid in each Congressional District.

21. By comparing the total number of signatures each LEA has checked against PNP's own internal estimate of the total number of signatures the Secretary's Office actually sent to each LEA for processing, PNP has also been able to estimate the approximate number of signatures left to be checked in each Congressional District.

22. PNP posts all of this work on its website and updates that website as the Secretary's Office issues new reports. This work can be found at:

<https://peoplenotpoliticiansmo.org/road-to-qualifying/>.

23. Based on the Secretary's April 15, 2026 report, the referendum has more than enough valid signatures to qualify in six of Missouri's eight Congressional Districts. PNP estimated the following statistics for Congressional Districts 1, 2, 3, 4, 5, and 8:

CD	Valid Sigs Needed	Total number of valid signatures (so far)	Estimate of sigs not yet reviewed	Progress to Certification
1	15,586	24,720	0	158.5%
2	21,570	28,454	0	131.9%
3	20,062	28,040	410	139.8%
4	18,544	24,635	2K	132.8%
5	16,700	24,025	0	143.9%
7	18,599	20,429	4.9K	109.8%

24. At this time, PNP estimates there are approximately 7,300 signatures left to check in Congressional Districts 3, 4, and 7. Specifically, PNP estimates that:

- a. LEAs in Congressional District 3 have approximately 410 signatures left to check;
- b. LEAs in Congressional District 4 have approximately 2,000 signatures left to check; and
- c. LEAs in Congressional District 7 have approximately 4,900 signatures left to check.

25. Based on discussions with election officials and documents received through sunshine requests, it is PNP's understanding and belief that Congressional Districts 1, 2, and 5 finished checking signatures for this referendum approximately one month ago.

26. Based on discussions with election officials and documents received through sunshine requests, it is PNP's understanding and belief that once a county LEA has received signature pages, a county LEA started (or will start) the checking process on its own schedule and will check signatures at its own pace.


27. Based on discussions with election officials and documents received through sunshine requests, it is PNP's understanding and belief that many of the signatures left to be checked in Congressional Districts 3, 4, and 7 are attributable to a handful of counties that have chosen not to begin checking signatures yet.

28. In Congressional District 7, the LEA for Greene County began checking signatures in January. More recently, the pace of review in Greene County slowed considerably. PNP understands there have been staffing changes at the LEA in Greene County.


29. As of March 6, 2026, LEAs in Congressional District 7 had validated 18,124 signatures and PNP estimated they had approximately 7,500 signatures to review. As of April 10, PNP estimated LEAs in Congressional District 7 had slightly more than 5,000 signatures left to review. As of April 15 (the Secretary's last posted report), PNP estimated they have approximately 4,900 signatures to review.

30. Based on discussions with election officials and documents received through sunshine requests, it is PNP's understanding and belief that LEAs in Congressional District 8 were instructed not to check any signatures because PNP did not submit enough signatures postdating October 14, 2025 to qualify in that district.

FURTHER AFFIANT SAYETH NOT.


Richard von Glahn

The foregoing was subscribed and sworn to before me this 27th day of April, 2026.


Notary Public

(Seal)



My commission expires: MAY 6th, 2029

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