

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.)

PLAINTIFFS' STATUS REPORT ON SIGNATURE REVIEW

Pursuant to the Court's April 17, 2026 Order, Plaintiffs submit this status report on the status of signature review.

PNP GATHERS SIGNATURES

1. As the Court is aware, this litigation concerns the status of signatures gathered for the referendum on House Bill 1 prior to October 14, 2025.

2. People Not Politicians ("PNP") began gathering the signatures at issue on September 15, 2025. Richard von Glahn Aff. ¶ 4.

3. Between September 15 and October 14, 2025, PNP gathered approximately 102,800 signatures. von Glahn Aff. ¶ 5; *see also* 10/28/2025 Joint Stips. ¶¶ 29, 32.

4. PNP worked with its signature gatherers (*i.e.*, circulators) to ensure those circulators completed the circulator affidavits required by § 116.080, RSMo. von Glahn Aff. ¶ 6.

PNP FILES SIGNATURES

5. On December 9, 2025, PNP filed 305,968 signatures in support of the referendum at issue with the Secretary of State. von Glahn Aff. ¶ 7. This included the roughly 102,800 signatures in dispute. *Id.*

6. On December 9, 2025, the Secretary's Office issued PNP a receipt memorializing the filing of these signatures, and that they were contained in 691 boxes. von Glahn Aff. ¶ 8; Ex. A to von Glahn Aff.

7. All the signature pages PNP submitted on December 9, 2025 included the circulator affidavits required by § 116.080, RSMo, and substantially followed the form mandated by § 116.030, RSMo. von Glahn Aff. ¶ 10; see Ex. B to von Glahn Aff.

TRANSMISSION OF SIGNATURES TO LEAS

8. On January 5, 2026, the Secretary's Office notified PNP it had separated the signatures PNP filed based on whether signatures were dated before or after October 14, 2025. von Glahn Aff. ¶ 12. The Secretary's Office further advised it was **not** sending signature pages containing only signatures gathered before October 14, 2025 to local election authorities ("LEAs") for further processing. von Glahn Aff. ¶¶ 15-16; Exs. C-D to von Glahn Aff. This is consistent with Ms. Peters' trial testimony. Trial Tr. at 80:21-81:12.

9. The Secretary's March 23, 2026 Motion to Quash likewise confirms his office has not sent signatures gathered before October 14, 2025 to LEAs for processing. *See* Mot. to Quash at 9-13.

10. It is difficult to identify the **precise** number of signatures that have not been sent to LEAs because the Secretary's January 5, 2026 communications to PNP identified the number of signature pages being withheld, rather than the number of signatures being withheld. *See* Exs. C-D to von Glahn Aff.

11. It is PNP's understanding that the Secretary's Office sent signature pages that contained signatures gathered both before and after October 14, 2025 to LEAs and is withholding only those signature pages that exclusively contain signatures gathered before October 14, 2025. *von Glahn Aff.* ¶¶ 15-16.

12. PNP estimates that approximately 100,000 signatures were not sent to LEAs. *von Glahn Aff.* ¶ 17.

LEAS' VALIDATION WORK

13. The Secretary of State's Office posts preliminary reports of the progress LEAs have made in processing signatures to its website at: <https://www.sos.mo.gov/petitions/PreliminaryReports>.

14. These reports are posted every few days. The Secretary's Office has posted nine such reports since March 10, 2026. *Id.*

15. These reports identify (i) the total number of signatures a county LEA has deemed valid, (ii) the total number of signatures a county LEA has deemed invalid, and (iii) the total number of signatures a county LEA has

checked. *See, e.g.,*

<https://www.sos.mo.gov/CMSImages/Elections/Petitions/2026PreliminaryCounts/2026-R004/4-15-26SignatureTotalsByCounty.pdf>.

16. As the Secretary has posted these reports, PNP has downloaded them, tallied the total number of signatures each county LEA has determined to be valid and the total number of signatures each county LEA has checked. *von Glahn Aff.* ¶ 19.

17. This has allowed PNP to track the total number of signatures LEAs have deemed valid in each Congressional District. *von Glahn Aff.* ¶ 20.

18. Additionally, 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. *von Glahn Aff.* ¶¶ 18, 21.

19. 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 and PNP estimates there are approximately 7,300 signatures left to check in three of those Congressional Districts¹:

¹ PNP posts this work on its website and updates it as the Secretary's Office issues new reports. *See von Glahn Aff.* ¶ 22; <https://peoplenotpoliticiansmo.org/road-to-qualifying/>.

CD	Valid Sigs Needed	Total number of valid signatures (so far)	Estimate of sigs not yet reviewed	Progress to Certification
1	15,596	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%

von Glahn Aff. ¶ 23.

20. It is PNP's understanding and belief that Congressional Districts 1, 2, and 5 finished checking signatures for this referendum approximately a month ago. von Glahn Aff. ¶ 25.

21. Each county LEA started (or will start) the checking process on its own schedule and checks signatures at its own pace. von Glahn Aff. ¶ 26.

22. PNP estimates LEAs in Congressional District 3 have approximately 410 signatures left to check, LEAs in Congressional District 4 have approximately 2,000 signatures left to check, and LEAs in Congressional District 7 have approximately 4,900 signatures left to check. von Glahn Aff. ¶ 24.

23. It is PNP's understanding and belief that many of the signatures left to be checked in those three Congressional Districts are attributable to a handful of counties that have chosen not to begin checking signatures yet. von Glahn Aff. ¶ 27.

24. The one notable exception to this is Greene County (in Congressional District 7), where signature review was started but the pace slowed considerably after January, possibly due to staffing changes. von Glahn Aff. ¶¶ 28-29.

25. It is PNP's understanding 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. von Glahn Aff.
¶ 30.

WHAT THIS MEANS

26. The Court directed PNP to address whether it had “submitted the requisite number of signatures to be placed on the ballot.” It did.

27. The Court also asked PNP to address if those signatures “have been accepted as sufficient to be placed on the ballot.” The signatures were presumptively valid, the LEAs have confirmed the validity of enough signatures, and the Secretary has no basis to reject enough signatures to prevent this referendum from appearing on the ballot. *See* § 116.140, RSMo (identifying limited grounds for Secretary to reject the work of LEAs).

28. As explained above, the signature pages include circulator affidavits attesting to the validity of all 305,968 signatures it filed with the Secretary’s Office on December 9, 2025.

29. As a matter of law, those circulator affidavits create a presumption of validity for every signature submitted. *Kaesser v. Becker*, 243 S.W. 346, 350 (Mo. banc 1922) (“Each petition, purporting to be signed by legal voters with addresses of the signers and supported by the statutory affidavit of the circulator thereof and filed in the office of the secretary of state, is prima facie proof of the genuineness of such signatures, that the persons whose signatures appear thereon live at the addresses given, and that such persons are legal voters.”); *Ketcham v. Blunt*, 847 S.W.2d 824, 832 (Mo. App. 1992) (“The [circulator’s]

affidavit creates a presumption of validity which can be overcome by competent evidence.”)

30. “[T]he Secretary of State [i]s required by section 116.040 and section 116.080 to accept facially sufficient signed and notarized circulator affidavits in determining whether to certify [a referendum] as sufficient.” *Bradshaw v. Ashcroft*, 559 S.W.3d 79, 91 (Mo. App. 2018). And, once the LEAs have reviewed the signatures, “[t]he secretary of state is required to accept the certification of valid signatures provided by local election authorities, subject only to the limited authority extended to reject certified signatures that, in the secretary of state’s opinion, are fraudulent or forged.” *Id.* at 87.

31. In short, PNP submitted a sufficient number of presumptively valid signatures on December 9, 2025 and—as the figures reported on the Secretary’s own website illustrate—the LEAs have now certified that PNP did, indeed, submit enough valid signatures.

32. Notably, however, the Secretary’s Office did not instruct LEAs to cease processing signatures when the constitutional threshold for qualification was reached (though it apparently did tell them not to even start in Congressional District 8).

33. Instead, LEAs continued checking tens of thousands of signatures after the threshold was reached.

34. In Congressional Districts 1 and 2, for example, LEAs continued checking (respectively) approximately 9,000 and 7,000 signatures after the constitutional threshold was reached.

35. And, in Congressional Districts 3 and 4, LEAs are apparently **continuing** to check signatures, despite the qualification thresholds being exceeded by approximately 8,000 and 6,000 signatures (respectively).

36. That is, of course, what PNP is asking the Court to order the Secretary to do with respect to the roughly 100,000 signatures the Secretary is refusing to send to LEAs: process them irrespective of whether the constitutional threshold has been met.

37. Continuing to have LEAs process signatures after the constitutional thresholds have been met is difficult to square with the Secretary's simultaneous assertion that he should not have to process the other 100,000 signatures *because the constitutional thresholds might be met without them.*

38. But, insofar as the Court is holding this case in abeyance because validating signatures beyond what is necessary to place the referendum on the ballot would theoretically render the case moot, then the Court should cease holding the case in abeyance and make its decision about whether the case is moot now. As the Secretary's own data reflects, LEAs have validated far more than enough signatures.

39. In his filings since January 2026, the Secretary has refused to say when he expects validation work to be done and a decision on certification made.

But he has strongly indicated he plans to take until August. *See generally* Mot. to Quash.

40. As noted above, some LEAs have not even started processing signatures yet.

41. Additionally, the pace of signature review has slowed substantially in Congressional District 7. 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. *See* 3/6/2026 Mot. to End Abeyance at 9; von Glahn Aff. ¶ 29. Over one month later, as of April 10, PNP estimated LEAs in Congressional District 7 had slightly more than 5,000 signatures left to review. *Id.* As of the latest report, PNP estimates they have approximately 4,900 signatures to review. *Id.*

42. Nothing obligates the LEAs to move any faster. They have until late July to complete their work. *See* § 116.030.2, RSMo.

43. Thus, the present situation is that LEAs have confirmed the validity of substantially more signatures than are needed for this referendum to qualify for the ballot and this case—tried last December—is being held in abeyance based on the pace of review (or decision not to even begin reviewing) of a handful of counties.

44. Regardless, there are undoubtedly sufficient valid signatures in six of eight congressional districts and the referendum on House Bill 1 should appear on the November 2026 ballot.

45. While the Secretary may claim the above figures provided by LEAs are “preliminary,” he cannot avoid this reality. The Secretary’s authority to invalidate signatures already deemed valid by the LEAs is extremely limited. § 116.140, RSMo; *Bradshaw*, 559 S.W.3d at 87.

46. Thus, it is mere pretext for the Secretary to claim there is much work left for his office to do, or any serious doubt as to whether this referendum has enough valid signatures.

47. If the Secretary believes there may be some valid basis for him to reject the *thousands* of signatures that would be necessary to disqualify this referendum from the ballot (and justify continuing to hold the case in abeyance), then he should *tell the Court* what that basis and authority might be.

48. Otherwise, the Court should accept what is obvious from the LEA reports and proceed to make a decision on this case.

49. Put simply, while this Court cannot require the Secretary to issue a certificate of sufficiency (or insufficiency), this Court *can* rule on the merits of this case or, if it believes there are sufficient signatures (which there are), dismiss the case as moot.²

² Plaintiffs do not concede this case would be moot *even if* there are sufficient signatures to qualify the referendum for the November 2026 ballot. *See No Bans on Choice v. Ashcroft*, 638 S.W.3d 484 (Mo. banc 2022).

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 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 27th day of April, 2026.

/s/ Charles W. Hatfield

Attorney for Plaintiffs