

SC101805

SUPREME COURT OF MISSOURI

RICHARD VON GLAHN

Plaintiffs/Appellants

V.

DENNY HOSKINS, ET AL.

Defendants/Respondents

Appeal from the Circuit Court of Cole County, Missouri, Case No. 26AC-
CC00440

BRIEF OF AMICI CURIAE RACHEL LIGHTFOOT, COUNTY CLERK &
ELECTION AUTHORITY OF POLK COUNTY AND BRIANNA L. LENNON,
COUNTY CLERK & ELECTION AUTHORITY OF BOONE COUNTY

BRIANNA L. LENNON

Missouri Bar No. 63964

801 E. WALNUT, ROOM 236

COLUMBIA, MO 65201

(573) 886-4296

blennon@boonemo.gov

ATTORNEY FOR AMICI CURIAE

TABLE OF CONTENTS

TABLE OF AUTHORITIES.....	3
IDENTITY AND INTEREST OF AMICUS CURIAE.....	4
STATEMENT OF CONSENT.....	4
ARGUMENT.....	5
I. The circuit court erred in concluding that local election authorities are unable to utilize the 2022 congressional districts for the November 3, 2026 general election.....	5
A. Missouri’s election authorities have already updated the State’s voter registration database to assign voters to their new congressional districts under HB 1 and have retained voters’ 2022 congressional district assignments in MCVR.....	5
B. MCVR’s technical infrastructure that “locks” the ability to redefine or edit districts is not relevant to this case because the districts already exist in MCVR and do not need to be changed.....	6
CONCLUSION.....	7
CERTIFICATE OF SERVICE AND COMPLIANCE.....	8

TABLE OF AUTHORITIES

RULES

MO. SUP. CT. RULE 84.05 4

STATUTES

RSMO. § 115.158 5

IDENTITY AND INTEREST OF AMICI CURIAE

Amicus Curiae Rachel Lightfoot is the elected County Clerk and Election Authority of Polk County, where she has served since 2021. She is the local election official responsible for administering elections in Polk County, including the November 2026 general election.

Amicus Curiae Brianna Lennon is the elected County Clerk and Election Authority of Boone County, Missouri, where she has served since 2019. She is the local election official responsible for administering elections in Boone County, including the November 2026 general election.

HB 1 created new congressional district lines in Missouri and *Amici* have a vested interest in this case because they must administer the November 3, 2026 general election. *Amici* take no position regarding which map should be used for the November 3, 2026 general election; however, they seek to correct a technical inaccuracy in the judgment of the lower court.

AUTHORITY FOR BRIEF OF AMICI CURIAE

“A brief may be filed by amicus curiae in cases before this Court on the merits. MO. SUP. CT. R. 84.05(f)(2). “The brief shall only be filed with the consent of all parties or upon order of this Court.” *Id.* All parties consented to the filing of this brief in writing on August 24, 2026.

ARGUMENT

I. The circuit court erred in concluding that local election authorities are unable to utilize the 2022 congressional districts for the November 3, 2026 general election.

On August 19, 2026, the circuit court entered a judgment that concluded it was “impossible” to revert to the 2022 congressional district map for the November 3, 2026 general election due to time constraints and technological restrictions in the state’s voter registration database. L.F. 63 p. 36 (170-171). While it is true that the redistricting process is manual and time-intensive for local election officials, *Amici* submit this brief to explain that the Court need not consider that concern in this case.

A. Missouri’s election authorities have already updated the State’s voter registration database to assign voters to their new congressional districts under HB 1 and have retained voters’ 2022 congressional district assignments in MCVR.

Pursuant to § 115.158, RSMo., *Amici* utilize the Secretary of State’s Missouri Centralized Voter Registration system (“MCVR”) for all voter records, including congressional district assignments. Prior to May 2026, each Missouri voter record was assigned only to the congressional districts created by the Missouri Legislature in 2022.

While it is the responsibility of the Missouri Secretary of State's Office to create a new congressional district in MCVR, that district does not have any voters tied to it when it is created by the state because it is the responsibility of the local election authorities to tie the appropriate voter records to the new district.

In May 2026, The Secretary of State’s Office created the new HB 1 districts in MCVR and directed local election authorities, including *Amici*, to tie voters to

their 2025 Congressional districts. This process was time-intensive and manual, but, importantly, it did not overwrite the 2022 congressional districts. Every local election authority completed the process of redistricting in May 2026. As a result, local election officials had the choice of selecting either the 2022 or HB 1 congressional district to use in MCVR for their August 2026 primary election. That choice is still available for the November 3, 2026 general election because, as of the date of this brief, voters are still assigned to both districts in MCVR.¹

B. MCVR’s technical infrastructure that “locks” the ability to redefine or edit districts is not relevant to this case because the districts already exist in MCVR and do not need to be changed.

Amici know from experience in 2022 and 2026 that redistricting is a lengthy manual process in MCVR and that, because MCVR “locks” district boundaries during any active election, new districts cannot be created (and voters subsequently cannot be assigned to new districts) while a county administers an election.

If the current situation was that local election authorities were being asked to implement an entirely new map today, for example, it would be too late to redefine or edit a new district because MCVR does “lock” that ability. However, that is not the case here. *Amici*, and other local election authorities, have already assigned voters to both the 2022 and HB 1 districts — they do not need to redefine or edit the information in MCVR. As a result, MCVR’s security practice of “locking” districts has no impact on local election authorities’ ability to set up their November 3, 2026 general election using whichever congressional map this Court decides.

¹ Both MCVR and the state’s voter registration lookup tool on the Missouri Secretary of State’s public website display voters’ 2022 and HB 1 district assignments.

CONCLUSION

Amici respectfully asks this Court to correct the error below and note that it is not practically or technologically impossible for local election authorities to utilize the 2022 congressional district lines. Correcting the record will ensure an accurate understanding of the redistricting process and local election authorities' roles.

Respectfully submitted,

/s/ Brianna L. Lennon

Brianna L. Lennon

Missouri Bar No. 63964

801 E. Walnut, Room 236

Columbia, MO 65201

(573) 886-4296

blennon@boonemo.gov

Attorney for *Amici Curiae*

CERTIFICATE OF SERVICE AND COMPLIANCE

On August 24, 2026, a true and correct copy of this brief was sent by electronic mail via the Missouri eFiling System to all counsel of record. MO. SUP. CT. R. 103.08(a).

This brief includes the information required by MO. SUP. CT. R. 55.03. It complies with MO. SUP. CT. R. 84.06(b) and contains 834 words. The undersigned relied on the word count of the word-processing system used to prepare the brief.

/s/ Brianna L. Lennon
Brianna L. Lennon