

**IN THE CIRCUIT COURT OF COLE COUNTY, MISSOURI
19th JUDICIAL CIRCUIT**

PAUL RITTER,)	
)	Case No. _____
Plaintiff,)	
)	
v.)	
)	
MISSOURI SECRETARY OF STATE)	
JOHN ASHCROFT,)	
Serve:)	
Capitol Building, Room 208)	
Jefferson City, MO 65101,)	
)	
Defendant.)	

**PETITION FOR RELIEF UNDER SECTION 116.200, RSMO,
AND FOR OTHER DECLARATORY AND INJUNCTIVE RELIEF**

Preliminary Statement

The case seeks to stop an unconstitutional abuse of the initiative. In November 2016, Democratic operative Sean Soendker Nicholson submitted sixteen initiative petitions to former Secretary of State Jason Kander. The sixteen petitions contained various provisions but a common thread appeared: Nicholson proposed to radically change how Missouri redraws state legislative districts during reapportionment.

The petitions require an unelected state demographer to draw districts. Given Missouri’s political geography, the new state demographer would be forced to either draw noncontiguous districts (say, mixing a district of rural Missouri in with a slice of St. Louis or Kansas City) or conical districts that link slivers of traditional urban communities with swaths of rural Missouri.

Unwilling to present this redistricting proposal to Missouri voters on its own merits, Nicholson surrounded it with numerous other proposed changes to Missouri's Constitution, including but not limited to: (1) new campaign finance regulations; (2) a repeal and replacement of certain campaign contribution limits passed just days earlier; (3) limits on lobbyist gifts; (4) a so-called "revolving door" ban on legislators lobbying at the state or local level for two years after the expiration of any term of office for which such person was elected or appointed, and implementing a similar ban for all legislative staff; (5) prohibiting political fundraising on any state property by candidates for or members of the state legislature, including a member of the state legislature running for statewide, local, or judicial office; and (6) making legislative records subject to the Sunshine Law. Nicholson named this agglomeration "Clean Missouri."

Pursuant to Section 116.200, RSMo, Plaintiff seeks to stop this *ultra vires* exercise of the initiative power. "The people, from whom all constitutional authority is derived, have reserved the 'power to propose and enact or reject laws and amendments to the Constitution.' Mo. Const. art. III, [sec.] 49. . . . [However, t]he people, speaking with equal vigor through the same constitution, have placed limitations on the initiative power. That those limitations are mandatory is clear and explicit. This constitution may be revised and amended only as therein provided." *Missourians to Protect the Initiative Process v. Blunt*, 799 S.W.2d 824, 827 (Mo. banc 1990). Missouri's Constitution and statutes contain longstanding and commonsense mandates against an initiative petition that concerns multiple subjects, amends multiple articles, or fails to set forth the full and correct text of the amendment, including all provisions of existing law that would be

repealed by the petition. Nicholson’s quest to redraw Missouri’s legislative districts violates each of these mandates. The petition must be rejected as an unconstitutional abuse of the initiative.

Plaintiff alleges for Plaintiff’s Petition for Relief under Section 116.200:

Parties

1. Plaintiff Paul Ritter is a citizen, taxpayer, and registered voter of the state of Missouri.

2. Defendant John (Jay) Ashcroft is the duly elected and acting Secretary of State of the state of Missouri (the “Secretary”).

3. The Secretary is named as a Defendant in his official capacity pursuant to section 116.200, RSMo, and pursuant to law.

4. “The statute authorizing injunctive relief permits “any citizen” to bring the action. § 116.200.1. Plaintiff is not required to show any particular harm.” *Missourians to Protect the Initiative Process*, 799 S.W.2d at 829.

Jurisdiction and Venue

5. Plaintiff brings this action pursuant to the Revised Statutes of Missouri Chapters 116, 527, and 536; and Missouri Rules of Civil Procedure nos. 87 and 92.

6. Venue is proper in this Court pursuant to section 116.200.1, RSMo.

7. Venue is proper in this Court pursuant to section 508.010, RSMo, because there is no count alleging a tort, and the office of the Missouri Secretary of State is a

resident of Cole County, Missouri, where the Secretary principally performs his official duties.

8. On August 2, 2018, the Secretary certified Petition 2018-048 (the “Petition”) as sufficient.

9. This action is timely pursuant to section 116.200.1, RSMo because it was brought within ten days after the Secretary made a certification for the Petition.

10. “Any controversy as to whether the prerequisites of article III, § 50 have been met is ripe for judicial determination when the Secretary of State makes a decision to submit, or refuse to submit, an initiative issue to the voters. At that point, a judicial opinion as to whether the constitutional requirements have been met is no longer hypothetical or advisory.” *Missourians to Protect the Initiative Process*, 799 S.W.2d at 828.

Petition 2018-048

11. On November 23, 2016, Sean Soendker Nicholson submitted to the Secretary an initiative petition sample sheet, denominated by the Secretary as IP 2018-048, proposing to revise Article III of the Missouri Constitution, “by amending Sections 2, 5, 7, 19, and adopting three new sections to be known as Article III Sections 3, 20(c), and 20(d)” Exhibit A.

12. A true and correct file-stamped copy of the initiative petition sample sheet for IP 2018-048 is attached as Exhibit A.

13. On January 5, 2017, former Missouri Secretary of State Jason Kander certified the Official Ballot Title for the Petition.

14. The summary statement portion of the Official Ballot Title reads:

Shall the Missouri Constitution be amended to:

- change process and criteria for redrawing state legislative districts during reapportionment;
- change limits on campaign contributions that candidates for state legislature can accept from individuals or entities;
- establish a limit on gifts that state legislators, and their employees, can accept from paid lobbyists;
- prohibit state legislators, and their employees, from serving as paid lobbyists for a period of time;
- prohibit political fundraising by candidates for or members of the state legislature on State property; and
- require legislative records and proceedings to be open to the public?

15. On May 3, 2018, Sean Soendker Nicholson, and/or an entity called “Clean Missouri,” submitted the Petition to the Secretary.

16. On August 2, 2018, the Secretary determined that the Petition met all constitutional and statutory requirements, and that a sufficient number of valid signatures were submitted.

17. On August 2, 2018, the Secretary issued a certificate of sufficiency of petition and certified the Petition to be placed on the ballot at the November 6, 2018 general election.

18. A true and correct copy of the Secretary’s Certificate of Sufficiency of Petition is attached as Exhibit B.

**COUNT I – THE PETITION CONTAINS MORE THAN ONE SUBJECT
(ARTICLE III, SECTION 50; ARTICLE XII, SECTION 2(b))**

19. Plaintiff incorporates the preceding paragraphs of this Petition as if fully set forth herein.

20. Article III, section 50 of the Missouri Constitution states, in part:

Petitions for constitutional amendments shall not contain more than one amended and revised article of this constitution, or one new article which shall not contain more than one subject and matters properly connected therewith, and the enacting clause thereof shall be “Be it resolved by the people of the state of Missouri that the Constitution be amended:”

21. Article XII, section 2(b) of the Missouri Constitution states, in part:

All amendments proposed by the general assembly or by the initiative shall be submitted to the electors for their approval or rejection by official ballot title as may be provided by law, on a separate ballot without party designation, at the next general election, or at a special election called by the governor prior thereto, at which he may submit any of the amendments. No such proposed amendment shall contain more than one amended and revised article of this constitution, or one new article which shall not contain more than one subject and matters properly connected therewith.

22. One “purpose of the prohibition on multiple subjects in a single ballot proposal is to prevent “logrolling,” a practice familiar to legislative bodies whereby unrelated subjects that individually might not muster enough support to pass are combined to generate the necessary support. *Moore v. Brown*, 165 S.W.2d at 662. The prohibition is intended to discourage placing voters in the position of having to vote for some matter which they do not support in order to enact that which they earnestly support. The single subject matter rule is the constitutional assurance that within the range of a subject and related matters a measure must pass or fail on its own merits. *State*

ex rel. Callaghan v. Maitland, 296 Mo. 338, 246 S.W. 267, 272 (banc 1922). That purpose is restated in article XII, § 2(b), the relevant portion of which reads:

More than one amendment at the same election shall be so submitted as to enable the electors to vote on each amendment separately.

Missourians to Protect the Initiative Process, 799 S.W.2d at 830.

23. All matters included in the Petition do not relate to any readily identifiable and reasonably narrow central purpose.

24. All matters included in the Petition are not properly connected to any readily identifiable and reasonably narrow central purpose.

25. The Petition concerns disparate topics that have broad application for all levels of government.

26. The Petition makes at least 21 different amendments to the constitution:

- a) Adding a so-called “revolving-door prohibition” that prevents legislators and legislative staff from becoming a paid lobbyist or soliciting lobbying clients during their time of service until the expiration of two calendar years after the conclusion of the last session where the legislator or employee served (Proposed Article III Section 2 (hereinafter, “Proposed Section #));
- b) Imposing limits on lobbyist gifts that may be accepted by legislators or legislative staff, with an inflation adjustment to increase the amount of gifts over time (Proposed Section 2(a));

- c) Prohibiting the General Assembly from making any law authorizing unlimited campaign contributions to candidates for the General Assembly (Proposed Section 2(c) (the Petition contains no “Proposed Section 2(b)”));
- d) Prohibiting the General Assembly from making any law circumventing the contribution limits in Article VIII, section 23 that apply to candidates for executive branch offices, candidates for judicial offices, political parties, and political party committees (Proposed Section 2(c));
- e) Stating that “[i]n addition to other campaign contribution limitations or restrictions provided for by law,” candidates for legislative office may not accept contributions exceeding \$2,500 “in any one election for the General Assembly” and making such “contribution limits and other restrictions of [Section 2] . . . apply to any person exploring a candidacy for [legislative office]” (Proposed Section 2(c));
- f) Prohibiting contributions to candidates for legislative office from being “made or accepted, directly or indirectly, in a fictitious name, in the name of another person, or by or through another person in such a manner as to, or with the intent to, conceal the identity of the actual source of the contribution” (Proposed Section 2(d));
- g) Creating a “rebuttable presumption that a contribution to a candidate for public office is made or accepted with the intent to circumvent the limitations on contributions imposed in this section when a contribution is received from a committee or organization that is primarily funded by a

single person, individual, or other committee that has already reached its contribution limit under any law relating to contribution limitations.”

(Proposed Section 2(d));

- h) Creating a safe harbor providing that “[i]n no circumstance shall a candidate be found to have violated limits on acceptance of contributions if the Missouri Ethics Commission, its successor agency, or a court determines that a candidate has taken no action to indicate acceptance of or acquiescence to the making of an expenditure that is deemed a contribution pursuant to this section.” (Proposed Section 2(e));
- i) Prohibiting any candidate for state or local office from “accept[ing] contributions from any federal political action committee unless the committee has filed the same financial disclosure reports that would be required of a Missouri political action committee (Proposed Section 2(f));
- j) Creating a new bureaucracy called the state demographer, and giving the State Auditor the power to select all the candidates for the state demographer (Proposed Section 3(a)–(c));
- k) Mandating that state legislative districts be drawn based on total population, including illegal immigrants and felons (Proposed Sections 3(c)(1)(a) (house districts); 5 & 7 (senatorial districts);
- l) Mandating that state legislative districts be designed to achieve “partisan fairness” and “competitiveness” as defined by the Petition (Proposed Section 3(c)(1)(b));

- m) Eliminating Missouri’s *requirement* that state legislative districts be contiguous, and making this former requirement expressly conditional on other factors (Proposed Section 3(c)(1)(c));
- n) Making Missouri’s preference for legislative districts that coincide with the boundaries of political subdivisions expressly conditional on other factors (Proposed Section 3(c)(1)(d));
- o) Making Missouri’s preference for compact legislative districts expressly conditional on other factors (Proposed Section 3(c)(1)(e));
- p) Changing procedures and timelines during reapportionment of legislative districts (Proposed Sections 3(c)(2)–(3) (state house districts), 7 (senatorial districts));
- q) Changing Missouri’s Speech and Debate Clause (Article III, section 19) to make state senators and representatives subject to arrest during legislative session for violations of any alleged offense under Article III (Proposed Section 19(a)), including:
- newly added campaign finance requirements, including contribution limits, prohibitions on certain federal political action committee contributions, and bans of soliciting contributions;
 - the newly added so-called “revolving-door” ban on becoming a lobbyist;
 - newly added requirements regarding the retention and provision of access to legislative records;

- violations of the legislator oath or affirmation under Article III, Section 15;
 - offenses concerning stem cell research, including cloning or attempting to clone a human being, producing a human blastocyst by fertilization solely for the purpose of stem cell research, or taking stem cells from a human blastocyst more than fourteen days after cell division begins (Article III, section 38(d)(2)–(3));
- r) Making “[l]egislative records . . . public records and subject to generally applicable state laws governing access to public records, including the ‘Sunshine Law[;]’ ” defining the term legislative record expansively to include any and all electronic records “created, stored, or distributed through legislative branch facilities, equipment or mechanisms, including electronic[;]” and defining who is the custodian of records for different types of legislative records (Proposed Section 19(b));
- s) Making “[l]egislative proceedings, including committee proceedings, . . . public meetings subject to generally applicable law governing public access to public meetings, including the ‘Sunshine Law’ ” (Proposed Section 19(c));
- t) Making “[o]pen public meetings of legislative proceedings . . . subject to recording by citizens” (Proposed Section 19(c)); and
- u) Banning political fundraising by members of or candidates for legislative office “on any premises, property or building owned, leased or controlled

by the State of Missouri or any agency or division thereof,” making any purposeful violation of such ban a crime subject to imprisonment and a fine, and authorizing the Missouri Ethics Commission to enforce the ban (Proposed Section 20(c)). This change will create an unequal playing field any time that a candidate for or member of the general assembly seeks to run for statewide, judicial, local office against an individual who is neither a candidate for or member of the general assembly.

27. If the Secretary of State is not enjoined, Plaintiff will suffer irreparable harm through the loss of Plaintiff’s tax dollars used to publish and print ballots containing the Official Ballot Title and for publication costs associated with the Petition.

28. If the Secretary of State is not enjoined, Plaintiff will suffer irreparable harm pursuant to § 116.200, RSMo, and Plaintiff’s constitutional rights under Article III and Article XII.

29. Plaintiff lacks an adequate remedy at law to protect Plaintiff’s interests.

30. Plaintiff is entitled to declaratory relief that the Petition contains more than one subject in violation of § 116.050, RSMo; Article III, § 50; and Article XII, § 2(b).

31. Plaintiff is entitled to injunctive relief commanding the secretary of state to rescind his certification the measure and enjoining all other officers from printing the measure on the ballot.

**COUNT II – THE PETITION AMENDS, REVISES, AND REPEALS
PROVISIONS IN MORE THAN ONE ARTICLE OF THE CONSTITUTION
(ARTICLE III, SECTION 50; ARTICLE XII, SECTION 2(b))**

32. Plaintiff incorporates the preceding paragraphs of this Petition as if fully set forth herein.

33. The Petition repeals the campaign contribution limits for the office of state senator and the office of state representative, currently set forth in Article VIII, § 23.3(1)(a).

34. The Petition amends the campaign contribution limits for all state offices and political parties, currently set forth in Article VIII, § 23.3, by creating a new method for aggregating contributions of different groups.

35. The Petition fails to indicate that it repeals and amends campaign contribution limits currently set forth in Article VIII, § 23.3.

36. If the Secretary of State is not enjoined, Plaintiff will suffer irreparable harm through the loss of Plaintiff's tax dollars used to publish and print ballots containing the Official Ballot Title and for publication costs associated with the Petition.

37. If the Secretary of State is not enjoined, Plaintiff will suffer irreparable harm pursuant to § 116.200, RSMo, and Plaintiff's constitutional rights under Article III and Article XII.

38. Plaintiff lacks an adequate remedy at law to protect Plaintiff's interests.

39. Plaintiff is entitled to declaratory relief that the Petition amends, revises, or repeals more than one article in violation of § 116.050, RSMo; Article III, § 50; and Article XII, § 2(b).

40. Plaintiff is entitled to injunctive relief commanding the secretary of state to rescind his certification the measure and enjoining all other officers from printing the measure on the ballot.

**COUNT III – THE PETITION FAILS TO SET FORTH THE FULL AND
CORRECT TEXT OF THE MEASURE
(SECTION 116.050, RSMO; ARTICLE III, SECTION 50 & ARTICLE III,
SECTION 28)**

41. Plaintiff incorporates the preceding paragraphs of this Petition as if fully set forth herein.

42. Section 116.050, RSMo, provides:

1. Initiative and referendum petitions filed under the provisions of this chapter shall consist of pages of a uniform size. Each page, excluding the text of the measure, shall be no larger than eight and one-half by fourteen inches. Each page of an initiative petition shall be attached to or shall contain a full and correct text of the proposed measure. Each page of a referendum petition shall be attached to or shall contain a full and correct text of the measure on which the referendum is sought.

2. The full and correct text of all initiative and referendum petition measures shall:

(1) Contain all matter which is to be deleted included in its proper place enclosed in brackets and all new matter shown underlined;

(2) Include all sections of existing law or of the constitution which would be repealed by the measure; and

(3) Otherwise conform to the provisions of Article III, Section 28 and Article III, Section 50 of the Constitution and those of this chapter.

43. Article III, section 28 of the Missouri Constitution provides:

No act shall be revived or reenacted unless it shall be set forth at length as if it were an original act. No act shall be amended by providing that words be stricken out or inserted, but the words to be stricken out, or the words to be inserted, or the words to be stricken out and those inserted in lieu thereof, together with the act or section amended, shall be set forth in full as amended.

44. Article III, section 50 of the Missouri Constitution provides, in part:

Article III, section 50 provides that “[i]nitiative petitions proposing amendments to the constitution . . . shall contain an enacting clause and the full text of the measure.”

45. The Petition does not “[c]ontain all matter which is to be deleted included in its proper place enclosed in brackets and all new matter shown underlined.”

Section 116.050, RSMo.

46. The Petition does not contain the full text of the measure, as required by Article III, sections 28 and 50.

47. The Petition amends Article III, section 2 of the Missouri Constitution.

48. Article III, section 2 of the Missouri Constitution provides, in part:

Not later than five months after the appointment of the commission, the commission shall file with the secretary of state a tentative plan of apportionment and map of the proposed districts and during the ensuing fifteen days shall hold such public hearings as may be necessary to hear objections or testimony of interested persons.

49. The Petition contains language within Proposed Section 3(c)(3) stating, in part:

Not later than five months after the appointment of the commission the commission shall receive the tentative plan of apportionment and map of the proposed districts ordered in subsection 4 of this section and during the

ensuing fifteen days shall hold such public hearings as may be necessary to hear objections or testimony of interested persons.

50. The Petition fails to underline any part of the above-quoted language in Proposed Section 3(c)(3).

51. The Petition fails to bracket language included in current Article III, section 2, but not appearing in the above-quoted language in Proposed Section 3(c)(3).

52. The Petition fails to contain the full and correct text of the proposed amendment because the Petition makes an undisclosed change to existing law by capitalizing the word “Article” in Proposed Section 3(c)(2) where the term is not capitalized in existing law.

53. The Petition fails to contain the full and correct text of the proposed amendment because the Petition makes an undisclosed change to existing law by capitalizing the word “Senate” in Proposed Section 5 where the term is not capitalized in existing law.

54. The Petition fails to contain the full and correct text of the proposed amendment because the Petition makes an undisclosed change to existing law by adding a comma in Proposed Section 19, but failing to disclose the change by underlining the comma.

55. The Petition fails to contain the full and correct text of the proposed amendment because the Petition repeals the limits in Article VIII, § 23.3(1)(a) for the “office of state senator” and the “office of state representative.”

56. If the Secretary of State is not enjoined, Plaintiff will suffer irreparable harm through the loss of Plaintiff's tax dollars used to publish and print ballots containing the Official Ballot Title and for publication costs associated with the Petition.

57. If the Secretary of State is not enjoined, Plaintiff will suffer irreparable harm pursuant to § 116.200, RSMo, and Plaintiff's constitutional rights under Article III and Article XII.

58. Plaintiff lacks an adequate remedy at law to protect Plaintiff's interests.

59. Plaintiff is entitled to declaratory relief that the Petition fails to set forth the full and correct text of the measure in violation of § 116.050, RSMo; Article III, § 50; and Article XII, § 2(b).

60. Plaintiff is entitled to injunctive relief commanding the secretary of state to rescind his certification the measure and enjoining all other officers from printing the measure on the ballot.

COUNT IV – THE PETITION FAILS TO INCLUDE ALL SECTIONS OF THE CONSTITUTION WHICH WOULD BE REPEALED BY THE MEASURE (SECTION 116.050, RSMO; ARTICLE III, SECTION 50 & ARTICLE III, SECTION 28)

61. Plaintiff incorporates the preceding paragraphs of this Petition as if fully set forth herein.

62. The Petition fails to list those sections of existing law and the Constitution that would be directly modified or repealed by its enactment.

63. The Petition fails to set forth in full those sections that would be directly modified or repealed by its enactment.

64. The Petition fails to contain all matter which is to be deleted included in its proper place enclosed in brackets and all new matter shown underlined.

65. If the Secretary of State is not enjoined, Plaintiff will suffer irreparable harm through the loss of Plaintiff's tax dollars used to publish and print ballots containing the Official Ballot Title and for publication costs associated with the Petition.

66. If the Secretary of State is not enjoined, Plaintiff will suffer irreparable harm pursuant to § 116.200, RSMo, and Plaintiff's constitutional rights under Article III and Article XII.

67. Plaintiff lacks an adequate remedy at law to protect Plaintiff's interests.

68. Plaintiff is entitled to declaratory relief that the Petition fails to set forth the full and correct text of the measure in violation of § 116.050, RSMo; Article III, § 50; and Article XII, § 2(b).

69. Plaintiff is entitled to injunctive relief commanding the secretary of state to rescind his certification the measure and enjoining all other officers from printing the measure on the ballot.

**COUNT V – THE PETITION IS FOR A PURPOSE PROHIBITED BY THE
MISSOURI CONSTITUTION
(U.S. CONST. AMEND I; ARTICLE I, SECTIONS 3 & 8; ARTICLE III,
SECTION 51)**

70. Article III, section 51 of the Missouri Constitution states that “[t]he initiative shall not be used for the appropriation of money other than of new revenues created and provided for thereby, or for any other purpose prohibited by this constitution.”

71. Article I, section 3 of the Missouri Constitution prohibits changes to the Missouri Constitution that are repugnant to the Constitution of the United States.

72. The Petition violates the First Amendment, and similarly repeals Missouri's Freedom of Speech, by banning political fundraising by members of or candidates for legislative office "on any premises, property or building owned, leased or controlled by the State of Missouri or any agency or division thereof," making any purposeful violation of such ban a crime subject to imprisonment and a fine, and authorizing the Missouri Ethics Commission to enforce the ban (Proposed Section 20(c)).

73. The political fundraising ban is significantly overbroad and plainly violates the First Amendment:

- a. It imposes a criminal ban on a member of or candidate for the state legislature engaging in political fundraising throughout a significant portion of the State. Vast reaches of Missouri constitute "premises, property or "building[s] owned, leased or controlled by the State of Missouri or any agency or division thereof. Such areas include, at a minimum every conservation area, state park, state building, state monument, piece of state university property, state owned or controlled road, state parking lots, and countless other areas that have nothing to do with the legislature;
- b. It imposes a criminal ban on a member of or candidate for the state legislature taking part in "solicitation or delivery of contributions, supporting or opposing any candidate, initiative petition, referendum petition, ballot measure, political party, or political committee[.]" The ban

expressly applies to independent expenditure groups despite that, as a matter of law, the state's interest in preventing *quid pro quo* corruption and its appearance does not apply to fundraising for such groups; and

c. The ban applies to state property leased by political groups.

74. If the Secretary of State is not enjoined, Plaintiff will suffer irreparable harm through the loss of Plaintiff's tax dollars used to publish and print ballots containing the Official Ballot Title and for publication costs associated with the Petition.

75. If the Secretary of State is not enjoined, Plaintiff will suffer irreparable harm pursuant to § 116.200, RSMo, and Plaintiff's constitutional rights under Article I, Article III, and Article XII.

76. The Petition's violations of the First Amendment are so obvious as to constitute a matter of form.

77. The Petition's violations of Article I, section 3 and Article III, section 51 are so obvious as to constitute a matter of form.

78. Plaintiff lacks an adequate remedy at law to protect Plaintiff's interests.

79. Plaintiff is entitled to declaratory relief that the Petition is facially unconstitutional under the First Amendment to the U.S. Constitution.

80. Plaintiff is entitled to declaratory relief that the Petition is for a purpose prohibited by Missouri Constitution.

81. Plaintiff is entitled to injunctive relief commanding the secretary of state to rescind his certification the measure and enjoining all other officers from printing the measure on the ballot.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays that this Court:

- (I) find that the Petition is insufficient,
- (II) pursuant to section 116.200, RSMo, and Missouri law, “enjoin the secretary of state from certifying the measure and all other officers from printing the measure on the ballot”;
- (III) grant declaratory relief consistent with this Petition; and
- (IV) grant such further relief as is just and proper.

Dated: Thursday, August 2, 2018.

Respectfully submitted

GRAVES GARRETT, LLC



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Attorneys for Plaintiff

It is a class A misdemeanor punishable, notwithstanding the provisions of section 560.021, RSMo, to the contrary, for a term of imprisonment not to exceed one year in the county jail or a fine not to exceed ten thousand dollars or both, for anyone to sign any initiative petition with any name other than his or her own, or knowingly to sign his or her name more than once for the same measure for the same election, or to sign a petition when such person knows he or she is not a registered voter.

INITIATIVE PETITION

To the Honorable Jason Kander, Secretary of State for the state of Missouri:

We, the undersigned, registered voters of the state of Missouri and _____ County (or city of St. Louis), respectfully order that the following proposed amendment to the constitution shall be submitted to the voters of the state of Missouri, for their approval or rejection, at the general election to be held on the 6th day of November, 2018, and each for himself or herself says: I have personally signed this petition; I am a registered voter of the state of Missouri and _____ County (or city of St. Louis); my registered voting address and the name of the city, town or village in which I live are correctly written after my name.

[Official Ballot title]

RECEIVED

NOV 23 2016

MO. SECRETARY OF STATE

CIRCULATOR'S AFFIDAVIT

STATE OF MISSOURI, COUNTY OF _____

I, _____, being first duly sworn, say (print or type names of signers)

NAME (Signature)	DATE SIGNED	REGISTERED VOTING ADDRESS (Number) (Street), (City, Town, or Village)	ZIP CODE	CONGR. DIST.	NAME (Printed or Typed)
1.					
2.					
3.					
4.					
5.					
6.					
7.					
8.					
9.					
10.					

signed this page of the foregoing petition, and each of them signed his or her name thereto in my presence; I believe that each has stated his or her name, registered voting address and city, town or village correctly, and that each signer is a registered voter of the state of Missouri and _____ County.

FURTHERMORE, I HEREBY SWEAR OR AFFIRM UNDER PENALTY OF PERJURY THAT ALL STATEMENTS MADE BY ME ARE TRUE AND CORRECT AND THAT I HAVE NEVER BEEN CONVICTED OF, FOUND GUILTY OF, OR PLED GUILTY TO ANY OFFENSE INVOLVING FORGERY.

I am at least 18 years of age. I do ___ do not ___ (check one) expect to be paid for circulating this petition.

If paid, list the payer:

 (Name of payer) Signature of Affiant (Person obtaining signatures)

 Printed Name of Affiant

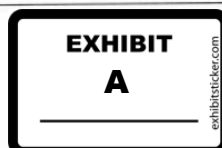
 Address of Affiant (Street, City, State & Zip Code)

Subscribed and sworn to before me this ___ day of _____, A.D. 201__.

Notary Public (Seal)

 Signature of Notary

My commission expires _____.



 Address of Notary (Street, City, State & Zip Code)

NOTICE: You are advised that the proposed constitutional amendment may change, repeal, or modify by implication or may be construed by some persons to change, repeal or modify by implication, the following Articles and Sections of the Constitution of Missouri: Article I, Section 8 and the following Sections of the Missouri Revised Statutes: Sections 105.450 through 105.496 and Sections 130.011 through 130.160. The proposed amendment revises Article III of the Constitution by amending Sections 2, 5, 7, and 19 and adopting three new sections to be known as Article III Sections 3, 20(c), and 20(d).

Be it resolved by the people of the state of Missouri that the Constitution be amended:

Section A. Article III of the Constitution is revised by amending Sections 2, 5, 7, 19, and adopting three new sections to be known as Article III Sections 3, 20(c), and 20(d) to read as follows:

Section 2.

After the effective date of this section, no person serving as a member of or employed by the General Assembly shall act or serve as a paid lobbyist, register as a paid lobbyist, or solicit prospective employers or clients to represent as a paid lobbyist during the time of such service until the expiration of two calendar years after the conclusion of the session of the general assembly in which the member or employee last served and where such service was after the effective date of this section.

(a) No person serving as a member of or employed by the General Assembly shall accept directly or indirectly a gift of any tangible or intangible item, service, or thing of value from any paid lobbyist or lobbyist principal in excess of five dollars per occurrence. This Article shall not prevent Candidates for the General Assembly, including candidates for reelection, or candidates for offices within the senate or house from accepting campaign contributions consistent with this Article and applicable campaign finance law. Nothing in this section shall prevent individuals from receiving gifts, family support or anything of value from those related to them within the fourth degree by blood or marriage. The dollar limitations of this section shall be increased or decreased each year by the percentage of increase or decrease from the end of the previous calendar year of the Consumer Price Index, or successor index as published by the U.S. Department of Labor, or its successor agency and rounded to the nearest dollar amount.

(c) The General Assembly shall make no law authorizing unlimited campaign contributions to candidates for the General Assembly, nor any law that circumvents the contribution limits contained in this Constitution. In addition to other campaign contribution limitations or restrictions provided for by law, the amount of contributions made to or accepted by any candidate or candidate committee from any person other than the candidate in any one election for the General Assembly shall not exceed the following:

(1) To elect an individual to the office of state senator, two thousand five hundred dollars; and

(2) To elect an individual to the office of state representative, two thousand dollars.

The contribution limits and other restrictions of this section shall also apply to any person exploring a candidacy for a public office listed in this subsection.

For purposes of this subsection, "base year amount" shall be the contribution limits prescribed in this section. Contribution limits set forth herein shall be adjusted on the first day of January in each even-numbered year hereafter by multiplying the base year amount by the cumulative consumer price index and rounded to the nearest dollar amount, for all years after 2018.

(d) No contribution to a candidate for legislative office shall be made or accepted, directly or indirectly, in a fictitious name, in the name of another person, or by or through another person in such a manner as to, or with the intent to, conceal the identity of the actual source of the contribution. There shall be a rebuttable presumption that a contribution to a candidate for public office is made or accepted with the intent to circumvent the limitations on contributions imposed in this section when a contribution is received from a committee or organization that is primarily funded by a single person, individual, or other committee that has already reached its contribution limit under any law relating to contribution limitations. A committee or organization shall be deemed to be primarily funded by a single person, individual, or other committee when the committee or organization receives more than fifty percent of its annual funding from that single person, individual, or other committee.

(e) In no circumstance shall a candidate be found to have violated limits on acceptance of contributions if the Missouri Ethics Commission, its successor agency, or a court determines that a candidate has taken no action to indicate acceptance of or acquiescence to the making of an expenditure that is deemed a contribution pursuant to this section.

(f) No candidate shall accept contributions from any federal political action committee unless the committee has filed the same financial disclosure reports that would be required of a Missouri political action committee.

Section 3.

(a) There is hereby established the post of "non-partisan state demographer." The non-partisan state demographer shall acquire appropriate information to develop procedures in preparation for drawing legislative redistricting maps on the basis of each federal census for presentation to the house apportionment commission and the senatorial apportionment commission.

(b) The non-partisan state demographer shall be selected through the following process. First, state residents may apply for selection to the state auditor using an application developed by the state auditor to determine an applicant's qualifications and expertise relevant to the position. Second, the state auditor shall deliver to the majority leader and minority leader of the senate a list of at least three applicants with sufficient expertise and qualifications, as determined by the state auditor, to perform the duties of the non-partisan state demographer. Third, if the majority leader and minority leader of the senate together agree that a specific applicant should be selected to be the non-partisan state demographer, that applicant shall be selected and the selection process shall cease. Fourth, if the majority leader and minority leader of the senate cannot together agree on an applicant, they may each remove a number of applicants on the state auditor's list equal to one-third of the total number of applicants on that list, rounded down to the next integer, and the state auditor shall then conduct a random lottery of the applicants remaining after removal to select the non-partisan state demographer. The state auditor shall prescribe a time frame and deadlines for this application and selection process that both encourages numerous qualified applicants and avoids delay in selection. The non-partisan state demographer shall serve a term of five years and may be reappointed. To be eligible for the non-partisan state demographer position an individual shall not have served in a partisan, elected position for four years prior to the appointment. The non-partisan state demographer shall be disqualified from holding office as a member of the general assembly for four years following the date of the presentation of his or her most recent legislative redistricting map to the house apportionment commission or the senatorial apportionment commission.

(c) The house of representatives shall consist of one hundred sixty-three members elected at each general election and apportioned [in the following manner:] as provided in this section.

(1) Within ten days after the population of this state is reported to the President for each decennial census of the United States or, in the event that a reapportionment has been invalidated by a court of competent jurisdiction, within ten days after such a ruling has been made, the non-partisan state demographer shall begin the preparation of legislative districting plans and maps using the following methods, listed in order of priority:

(a) Districts shall be established on the basis of total population. Legislative districts shall each have a total population as nearly equal as practicable to the ideal population for such districts, determined by dividing the number of districts to be established into the total

population of the state reported in the federal decennial census.

- (b) Districts shall be established in a manner so as to comply with all requirements of the United States Constitution and applicable federal laws, including, but not limited to, the Voting Rights Act of 1965 (as amended). Notwithstanding any other provision of this Article, districts shall not be drawn with the intent or result of denying or abridging the equal opportunity of racial or language minorities to participate in the political process or diminishing their ability to elect representatives of their choice, whether by themselves or by voting in concert with other persons.

Districts shall be designed in a manner that achieves both partisan fairness and, secondarily, competitiveness. Partisan fairness means that parties shall be able to translate their popular support into legislative representation with approximately equal efficiency. Competitiveness means that parties' legislative representation shall be substantially and similarly responsive to shifts in the electorate's preferences.

To this end, the non-partisan state demographer shall calculate the average electoral performance of the two parties receiving the most votes in the three preceding elections for governor, for United States Senate, and for President of the United States. This index shall be defined as the total votes received by each party in the three preceding elections for governor, for United States Senate, and for President of the United States, divided by the total votes cast for both parties in these elections. Using this index, the non-partisan state demographer shall calculate the total number of wasted votes for each party, summing across all of the districts in the plan. Wasted votes are votes cast for a losing candidate or for a winning candidate in excess of the fifty percent threshold needed for victory. In any plan of apportionment and map of the proposed districts submitted to the respective apportionment commission, the non-partisan state demographer shall ensure the difference between the two parties' total wasted votes, divided by the total votes cast for the two parties, is as close to zero as practicable.

To promote competitiveness, the non-partisan state demographer shall use the electoral performance index to simulate elections in which the hypothetical statewide vote shifts by one percent, two percent, three percent, four percent, and five percent in favor of each party. The vote in each individual district shall be assumed to shift by the same amount as the statewide vote. The non-partisan state demographer shall ensure that, in each of these simulated elections, the difference between the two parties' total wasted votes, divided by the total votes cast for the two parties, is as close to zero as practicable.

- (c) Subject to the requirements of subdivisions (1)(a) and (1)(b), Districts shall be composed of contiguous territory. Areas which meet only at the points of adjoining corners are not contiguous.
- (d) To the extent consistent with subdivisions (1)(a) – (1)(c) of this subsection, district boundaries shall coincide with the boundaries of political subdivisions of the state. The number of counties and cities divided among more than one district shall be as small as possible. When there is a choice between dividing local political subdivisions, the more populous subdivisions shall be divided before the less populous, but this preference shall not apply to a legislative district boundary drawn along a county line which passes through a city that lies in more than one county.
- (e) Preference shall be that districts are compact in form, but the standards established by subdivisions (1)(a) – (1)(d) of this subsection take precedence over compactness where a conflict arises between compactness and these standards. In general, compact districts are those which are square, rectangular, or hexagonal in shape to the extent permitted by natural or political boundaries.

- (2) Within sixty days after the population of this state is reported to the President for each decennial census of the United States [and] or, in the event that a reapportionment has been invalidated by a court of competent jurisdiction, within sixty days [after notification by the governor] that such a ruling has been made, the congressional district committee of each of the two parties casting the highest vote for governor at the last preceding election shall meet and the members of the committee shall nominate, by a majority vote of the members of the committee present, provided that a majority of the elected members is present, two members of their party, residents in that district, as nominees for reapportionment commissioners. Neither party shall select more than one nominee from any one state legislative district. The congressional committees shall each submit to the governor their list of elected nominees. Within thirty days the governor shall appoint a commission consisting of one name from each list to reapportion the state into one hundred and sixty-three representative districts and to establish the numbers and boundaries of said districts.

If any of the congressional committees fails to submit a list within such time the governor shall appoint a member of his own choice from that district and from the political party of the committee failing to make the appointment.

Members of the commission shall be disqualified from holding office as members of the general assembly for four years following the date of the filing by the commission of its final statement of apportionment.

For the purposes of this Article, the term congressional district committee or congressional district refers to the congressional district committee or the congressional district from which a congressman was last elected, or, in the event members of congress from this state have been elected at large, the term congressional district committee refers to those persons who last served as the congressional district committee for those districts from which congressmen were last elected, and the term congressional district refers to those districts from which congressmen were last elected. Any action pursuant to this section by the congressional district committee shall take place only at duly called meetings, shall be recorded in their official minutes and only members present in person shall be permitted to vote.

- (3) Within six months after the population of this state is reported to the President for each decennial census of the United States or, in the event that a reapportionment has been invalidated by a court of competent jurisdiction, within six months after such a ruling has been made, the non-partisan state demographer shall make public and file with the secretary of state and with the house apportionment commission a tentative plan of apportionment and map of the proposed districts, as well as all demographic and partisan data used in the creation of the plan and map.

The commissioners so selected shall, [on the fifteenth day, excluding Sundays and holidays, after all members have been selected] within ten days of receiving the tentative plan of apportionment and map of the proposed districts, meet in the capitol building and proceed to organize by electing from their number a chairman, vice chairman and secretary[and]. The commission shall adopt an agenda establishing at least three hearing dates on which hearings open to the public shall be held to hear objections or testimony from interested persons. A copy of the agenda shall be filed with the clerk of the house of representatives within twenty-four hours after its adoption. Executive meetings may be scheduled and held as often as the commission deems advisable.

The commission may make changes to the tentative plan of apportionment and map of the proposed districts received from the non-

partisan state demographer provided that such changes are consistent with this section and approved by a vote of at least seven-tenths of the commissioners. If no changes are made or approved as provided for in this subsection, the tentative plan of apportionment and map of proposed districts shall become final. Not later than two months of receiving the tentative plan of apportionment and map of the proposed districts, the commission shall file with the secretary of state a final statement of the numbers and the boundaries of the districts together with a map of the districts.

[The commission shall reapportion the representatives by dividing the population of the state by the number one hundred sixty-three and shall establish each district so that the population of that district shall, as nearly as possible, equal that figure.

Each district shall be composed of contiguous territory as compact as may be.

Not later than five months after the appointment of the commission the commission shall receive the tentative plan of apportionment and map of the proposed districts ordered in subsection 4 of this section and during the ensuing fifteen days shall hold such public hearings as may be necessary to hear objections or testimony of interested persons.

Not later than six months after the appointment of the commission, the commission shall file with the secretary of state a final statement of the numbers and the boundaries of the districts together with a map of the districts, and no statement shall be valid unless approved by at least seven-tenths of the members.

After the statement is filed members of the house of representatives shall be elected according to such districts until a reapportionment is made as herein provided, except that if the statement is not filed within six months of the time fixed for the appointment of the commission, it shall stand discharged and the house of representatives shall be apportioned by a commission of six members appointed from among the judges of the appellate courts of the state of Missouri by the state supreme court, a majority of whom shall sign and file its apportionment plan and map with the secretary of state within ninety days of the date of the discharge of the apportionment commission. Thereafter members of the house of representatives shall be elected according to such districts until a reapportionment is made as herein provided.]

Each member of the commission shall receive as compensation fifteen dollars a day for each day the commission is in session but not more than one thousand dollars, and, in addition, shall be reimbursed for his actual and necessary expenses incurred while serving as a member of the commission.

No reapportionment shall be subject to the referendum.

Section 5.

(a) The Senate shall consist of thirty-four members elected by the qualified voters of the senatorial [respective] districts for a term of four years. [For the election of senators, the state shall be divided into convenient districts of contiguous territory, as compact and nearly equal in population as may be.] Senatorial districts shall be apportioned as provided for in Article III, Section 7.

Section 7.

(1) Within ten days after the population of this state is reported to the President for each decennial census of the United States or, in the event that a reapportionment has been invalidated by a court of competent jurisdiction, within ten days after such a ruling has been made, the non-partisan state demographer authorized in Article III Section 3, shall begin the preparation of senatorial districting plans and maps using the same methods and criteria as those required by Article III, Section 3 for the establishment of districts for the House of Representatives.

(2) Within sixty days after the population of this state is reported to the President for each decennial census of the United States, [and] or within sixty days after [notification by the governor that] a reapportionment has been invalidated by a court of competent jurisdiction, the state committee of each of the two political parties casting the highest vote for governor at the last preceding election shall, at a committee meeting duly called, select by a vote of the individual committee members, and thereafter submit to the governor a list of ten persons, and within thirty days thereafter the governor shall appoint a commission of ten members, five from each list, to reapportion the thirty-four senatorial districts and to establish the numbers and boundaries of said districts.

If either of the party committees fails to submit a list within such time the governor shall appoint five members of his own choice from the party of the committee so failing to act.

Members of the commission shall be disqualified from holding office as members of the general assembly for four years following the date of the filing by the commission of its final statement of apportionment.

(3) Within six months after the population of this state is reported to the President for each decennial census of the United States or in the event that a reapportionment has been invalidated by a court of competent jurisdiction, within six months after such a ruling has been made, the non-partisan state demographer shall file with the secretary of state and with the senatorial apportionment commission a tentative plan of apportionment and map of the proposed districts.

The commissioners so selected shall [on the fifteenth day, excluding Sundays and holidays, after all members have been selected] within ten days of receiving the tentative plan of apportionment and map of the proposed districts required by this subsection, meet in the capitol building and proceed to organize by electing from their number a chairman, vice chairman and secretary [and]. The commission shall adopt an agenda establishing at least three hearing dates on which hearings open to the public shall be held to hear objections or testimony from interested persons. A copy of the agenda shall be filed with the secretary of the senate within twenty-four hours after its adoption. Executive meetings may be scheduled and held as often as the commission deems advisable. The commission may make changes to the tentative plan of apportionment and map of the proposed districts received from the non-partisan state demographer provided that such changes are consistent with this Section and the methods and criteria required by Section 3 of this Article for the establishment of districts for the House of Representatives and approved by a vote of at least seven-tenths of the commissioners. If no changes are made or approved as provided for in this subsection, the tentative plan of apportionment and map of proposed districts shall become final. Not later than two months after receiving the tentative plan of apportionment and map of the proposed districts, the commission shall file with the secretary of state a final statement of the numbers and the boundaries of the districts together with a map of the districts.

[The commission shall reapportion the senatorial districts by dividing the population of the state by the number thirty-four and shall establish each district so that the population of that district shall, as nearly as possible, equal that figure; no county lines shall be crossed except when necessary to add sufficient population to a multi-district county or city to complete only one district which lies partly within such multi-district county or city so as to be as nearly equal as practicable in population. Any county with a population in excess of the quotient obtained by dividing the population of the state by the number thirty-four is hereby declared to be a multi-district county.

Not later than five months after the appointment of the commission the commission shall file with the secretary of state a tentative plan of apportionment and map of the proposed districts and during the ensuing fifteen days shall hold such public hearings as may be necessary to hear objections or testimony of interested persons.

Not later than six months after the appointment of the commission, the commission shall file with the secretary of state a final statement of the numbers and the boundaries of the districts together with a map of the districts, and no statement shall be valid unless approved by at least seven members.

After the statement is filed senators shall be elected according to such districts until a reapportionment is made as herein provided, except that if the statement is not filed within six months of the time fixed for the appointment of the commission, it shall stand discharged and the senate shall be apportioned by a commission of six members appointed from among the judges of the appellate courts of the state of Missouri by the state supreme court, a majority of whom shall sign and file its apportionment plan and map with the secretary of state within ninety days of the date of the discharge of the apportionment commission. Thereafter senators shall be elected according to such districts until a reapportionment is made as herein provided.]

Each member of the commission shall receive as compensation fifteen dollars a day for each day the commission is in session, but not more than one thousand dollars, and, in addition, shall be reimbursed for his actual and necessary expenses incurred while serving as a member of the commission.

No reapportionment shall be subject to the referendum.

Section 19.

(a) Senators and representatives shall, in all cases except treason, felony, offenses under this Article, or breach of the peace, be privileged from arrest during the session of the general assembly, and for the fifteen days next before the commencement and after the termination of each session; and they shall not be questioned for any speech or debate in either house in any other place.

(b) Legislative records shall be public records and subject to generally applicable state laws governing public access to public records, including the "Sunshine Law." Legislative records include, but are not limited to, all records, in whatever form or format, of the official acts of the general assembly, of the official acts of legislative committees, of the official acts of members of the general assembly, of individual legislators, their employees and staff, of the conduct of legislative business and all records that are created, stored or distributed through legislative branch facilities, equipment or mechanisms, including electronic. Each member of the general assembly is the custodian of legislative records under the custody and control of the member, their employees and staff. The chief clerk of the house or the secretary of the senate are the custodians for all other legislative records relating to the house and the senate, respectively.

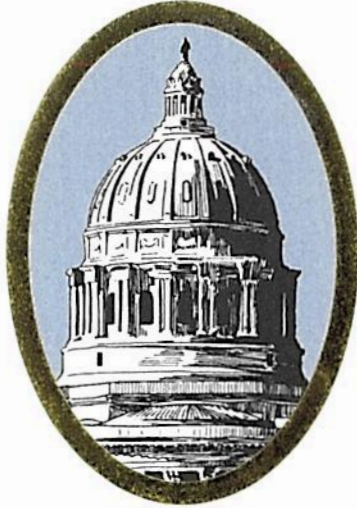
(c) Legislative proceedings, including committee proceedings, shall be public meetings subject to generally applicable law governing public access to public meetings, including the "Sunshine Law." Open public meetings of legislative proceedings shall be subject to recording by citizens, so long as the proceedings are not materially disrupted.

Section 20(c).

No political fundraising activities or political fundraising event by any member of or candidate for the general assembly, including but not limited to the solicitation or delivery of contributions, supporting or opposing any candidate, initiative petition, referendum petition, ballot measure, political party or political committee, shall occur in or on any premises, property or building owned, leased or controlled by the State of Missouri or any agency or division thereof. Any purposeful violation of this section shall be punishable by imprisonment for up to one year or a fine of up to one thousand dollars or both, plus an amount equal to three times the illegal contributions. The Missouri Ethics Commission or its successor agency is authorized to enforce this section as provided by law.

Section 20(d).

If any provision of sections 2, 3, 7, 19, or 20(c) or the application thereof to anyone or to any circumstance is held invalid, the remainder of those provisions and the application of such provisions to others or other circumstances shall not be affected thereby.



STATE OF MISSOURI
Office of
Secretary of State

CERTIFICATE OF SUFFICIENCY OF PETITION

STATE OF MISSOURI

ss.

SECRETARY OF STATE

I, John R. Ashcroft, Secretary of State of Missouri, do hereby certify that my office has examined for compliance with the Missouri Constitution and Chapter 116, RSMo, the initiative petition submitted by Sean Soendker Nicholson with the following official ballot title:

Shall the Missouri Constitution be amended to:

- change process and criteria for redrawing state legislative districts during reapportionment;
- change limits on campaign contributions that candidates for state legislature can accept from individuals or entities;
- establish a limit on gifts that state legislators, and their employees, can accept from paid lobbyists;
- prohibit state legislators, and their employees, from serving as paid lobbyists for a period of time;
- prohibit political fundraising by candidates for or members of the state legislature on State property; and
- require legislative records and proceedings to be open to the public?

State governmental entities estimate annual operating costs may increase by \$189,000. Local governmental entities expect no fiscal impact.

I further certify that this petition contains a sufficient number of valid signatures to comply with the Constitution of Missouri and Chapter 116, RSMo. Therefore, this initiative petition shall be placed on the ballot at the November 6, 2018 General Election.

IN TESTIMONY WHEREOF, I hereunto set my hand and affix the seal of my office in the City of Jefferson, State of Missouri, on this 2nd day of August 2018.




Secretary of State

EXHIBIT
B

exhibitsticker.com



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STATE INFORMATION CENTER
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JOHN R. ASHCROFT
SECRETARY OF STATE
STATE OF MISSOURI

ELECTIONS DIVISION
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**Constitutional Amendment to Article III,
Relating to the General Assembly, version 7
2018-048**

Congressional District 1: Sufficient
Signatures Needed: 25,572
Total Signatures Submitted: 64,186
Valid Signatures: 36,467

Congressional District 2: Sufficient
Signatures Needed: 33,830
Total Signatures Submitted: 55,946
Valid Signatures: 40,486

Congressional District 3: Sufficient
Signatures Needed: 30,395
Total Signatures Submitted: 47,443
Valid Signatures: 37,816

Congressional District 4: Insufficient
Signatures Needed: 27,103
Total Signatures Submitted: 10,160
Valid Signatures: 7,762

Congressional District 5: Sufficient
Signatures Needed: 26,157
Total Signatures Submitted: 114,552
Valid Signatures: 34,591

Congressional District 6: Sufficient
Signatures Needed: 28,607
Total Signatures Submitted: 45,613
Valid Signatures: 34,967

Congressional District 7: Sufficient
Signatures Needed: 27,454
Total Signatures Submitted: 50,441
Valid Signatures: 34,692

Congressional District 8: Insufficient
Signatures Needed: 25,306
Total Signatures Submitted: 5,573
Valid Signatures: 4,679

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