

amendments by petition, 26 of which have been successful.¹ The subjects of the citizen-initiated amendments have ranged from taxes to collective bargaining to public education. Michiganders have recently turned their attention to the elections arena, approving two pro-democracy constitutional amendments that are the subject of Plaintiffs' challenge.

In 2018, Michiganders overwhelmingly voted to expand voting rights and make voting more accessible.² In the general election that year, 67 percent of voters approved 2018 Proposal 3 to protect the following voting-related rights in the Michigan Constitution: a secret ballot, timely distribution of absentee ballots to military personnel or those living overseas, straight-ticket voting, automatic voter registration, registration by mail up to 15 days before an election, in-person registration extended to election day with proof of residence, no-reason absentee voting, and the right to have statewide election results audited. Mich. Const. art. II, § 4(1)(a)–(h). These self-executing rights contributed to record-high voter turnout in 2020.³ Nearly 30,000 people took

¹ See Mich. Legis. Serv. Bureau, *Proposed Amendments to the Constitution of 1963 – Summary of Adoption or Rejection*, in Michigan Manual 2021-2022, 101st Legislature, Michigan Legislature (2022), <http://legislature.mi.gov/documents/2021-2022/michiganmanual/2021-MM-P0098-p0104.pdf>; *2022 Michigan Election Results*, Mich. Sec'y of State Benson (2022), https://mielections.us/election/results/2022GEN_CENR.html.

² Notably, in the same election, Michiganders also overwhelmingly approved the establishment of an independent citizens redistricting commission with exclusive authority to adopt boundaries for the state's congressional and state legislative districts. Mich. Const. art. IV, § 6. Plaintiffs do not challenge the legitimacy of that amendment.

³ See *General Election Voter Registration/Turnout Statistics*, MIBOE (Feb. 2022), <https://www.michigan.gov/sos/-/media/Project/Websites/sos/Election-Results-and-Statistics/General-Voter-Reg-Turnout-Stats.pdf>.

