

IN THE CIRCUIT COURT OF COLE COUNTY, MISSOURI

PEOPLE NOT POLITICIANS *et al.*

Plaintiffs,

v.

Case No. 25AC-CC07128

MISSOURI SECRETARY OF STATE  
DENNY HOSKINS,

Defendant.

**JOINT STIPULATION OF FACTS AND EXHIBITS**

The Parties stipulate to the admission of the following facts and exhibits. By agreeing to stipulate to these facts and exhibits, the Parties do not concede that such facts and exhibits are relevant or necessary for the Court to resolve this matter. The Parties have agreed not to object to the entry of these facts and exhibits into the record, reserving objections to relevance only. Matters contained in exhibits but not expressly discussed in a stipulation are part of the record and may be cited by the Parties.

1. People Not Politicians is a campaign committee organized in the State of Missouri.
2. People Not Politicians is a campaign committee supporting the campaign for the referendum petitions submitted by Richard von Glahn.
3. Richard von Glahn is a Missouri citizen, resident of St. Louis County, a taxpayer, and qualified voter in the State of Missouri.

4. Richard von Glahn is the proponent of the referendum petitions 2026-R001; 2026-R002; 2026-R003; and 2026-R004.

5. Denny Hoskins is the Missouri Secretary of State.

6. Attached hereto as **Exhibit 1** is a true and correct copy of Make Your Voice Heard: Missouri's Initiative Petition Process, published by the Missouri Secretary of State.

7. On September 12, 2025, the Missouri General Assembly "truly agreed and finally passed" House Bill 1.

8. Attached hereto as **Exhibit 2** is a true and correct copy of House Bill 1 (2025).

9. Attached hereto as **Exhibit 3** is a true and correct copy of the Journal of the Senate from Friday, September 12, 2025.

10. Richard von Glahn submitted two referendum petition sample sheets (2026-R001 and 2026-R002) to the Secretary of State's Office on September 12, 2025.

11. Attached hereto as **Exhibit 4** is a true and correct copy of the referendum petition sample sheet 2026-R001.

12. Attached hereto as **Exhibit 5** is a true and correct copy of referendum petition sample sheet 2026-R002.

13. On September 12, 2025, the Secretary of State's Office sent a letter to Richard von Glahn regarding said sample sheets (2026-R001 and 2026-R002).

14. Attached hereto as **Exhibit 6** is a true and correct copy of the September 12, 2025 letter sent from the Secretary of State's Office to Richard von Glahn.

15. On September 14, 2025, the Secretary of State sent another letter to Richard von Glahn regarding the referendum petition sample sheets (2026-R001 and 2026-R002).

16. Attached hereto as **Exhibit 7** is a true and correct copy of the September 14, 2025 letter sent from the Secretary of State's Office to Richard von Glahn.

17. Richard von Glahn submitted a third referendum petition sample sheet (2026-R003) to the Secretary of State's Office on September 15, 2025.

18. Attached hereto as **Exhibit 8** is a true and correct copy of referendum petition sample sheet 2026-R003.

19. On September 15, 2025, the Secretary of State's Office sent a letter to Richard von Glahn regarding the referendum petition sample sheet (2026-R003).

20. Attached hereto as **Exhibit 9** is a true and correct copy of the September 15, 2025 letter sent from the Secretary of State's Office to Richard von Glahn.

21. Richard von Glahn's counsel sent a letter to the Secretary of State and the Attorney General dated September 15, 2025.

22. Attached hereto as **Exhibit 10** is a true and correct copy of the letter dated September 15, 2025 sent from Charles Hatfield to the Secretary of State and the Attorney General.

23. Richard von Glahn and People Not Politicians began gathering signatures in support of the referendum petition on September 15, 2025.

24. On September 26, 2025, the Secretary of State rejected Richard von Glahn's referendum petition sample sheets (2026-R001, 2026-R002, and 2026-R003) as to form.

25. Attached hereto as **Exhibit 11** are true and correct copies of the September 26, 2025 letters rejecting Richard von Glahn's referendum petition sample sheets as to form.

26. Governor Mike Kehoe signed House Bill 1 (2025) on September 28, 2025.

27. On September 29, 2025, Richard von Glahn submitted a fourth referendum petition sample sheet (2026-R004) to the Secretary of State's Office.

28. Attached hereto as **Exhibit 12** is a true and correct copy of referendum petition sample sheet 2026-R004.

29. Between September 15, 2025 and September 28, 2025, Plaintiffs collected approximately 32,600 signatures in support of the referendum petition. .

30. On October 14, 2025, the Secretary of State approved the fourth referendum petition sample sheet as to form (2026-R004).

31. Attached hereto as **Exhibit 13** is a true and correct copy of the October 14, 2025 letter approving the referendum petition sample sheet as to form.

32. Between September 29, 2025 and October 14, 2025, Plaintiffs collected approximately 70,200 signatures in support of the referendum petition.

33. The Secretary of State stated in an October 15, 2025 press release that "[u]nder Missouri law, no signatures gathered before this approval date are valid."

34. Attached hereto as **Exhibit 14** is a true and correct copy of the October 15, 2025 press release from the Secretary of State regarding referendum petition sample sheet 2026-R004.

35. Attached hereto as **Exhibit 15** is a true and correct copy of the October 16, 2025 press release from the Secretary of State regarding referendum petitions.

Respectfully Submitted,

**STINSON LLP**

**CATHERINE L. HANAWAY**  
**Missouri Attorney General**

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/s/ William J. Seidleck

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**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 28th day of October, 2025.

/s/Alixandra S. Cossette

Attorney for Plaintiffs