

IN THE CIRCUIT COURT OF COLE COUNTY, MISSOURI

PEOPLE NOT POLITICIANS,

and

RICHARD VON GLAHN,

Plaintiffs,

v.

MISSOURI SECRETARY OF STATE

DENNY HOSKINS,

Serve: 600 W. Main Street

Jefferson City, MO 65101

573.751.4936

Defendant.

Case No. _____

Plaintiffs People Not Politicians and Richard von Glahn allege and state as follows:

PARTIES

Plaintiff People Not Politicians

1. Plaintiff People Not Politicians is a campaign committee organized under the laws of the State of Missouri and subject to the regulation of the Missouri Ethics Commission.

2. People Not Politicians is the committee supporting the campaign for the referendum petitions submitted by Plaintiff von Glahn.

Plaintiff Richard von Glahn

3. Plaintiff Richard von Glahn is a Missouri citizen, resident of St. Louis County, a taxpayer, and qualified voter in the State of Missouri.

4. Plaintiff is the proponent of the referendum petitions that are the subject of this action.

5. Plaintiffs challenge House Bill 1's summary statement and request a new legally compliant summary statement pursuant to Section 116.190.

Respondent Secretary of State Denny Hoskins

6. Respondent Denny Hoskins is the Secretary of State of the State of Missouri.

7. The Secretary of State is charged with certifying official ballot titles for measures that will be voted on by Missouri voters.

8. Respondent Hoskins certified the ballot title at issue in this litigation.

9. Respondent Hoskins maintains his principal office in Cole County, Missouri.

FACTUAL ALLEGATIONS

10. On August 29, 2025, Governor Mike Kehoe issued a proclamation to convene the General Assembly for a special session to pass legislation designating new congressional districts.

11. The General Assembly convened on September 3, 2025 for the special session.

12. On September 12, 2025, the General Assembly truly agreed and finally passed House Bill 1 titled: “To repeal sections 128.345, and 128.348, RSMo, and to enact in lieu thereof twelve new sections relating to the composition of congressional districts.”

13. A true and correct copy of House Bill 1 is attached as **Exhibit A**.

14. On September 29, 2025, Plaintiff Richard von Glahn submitted a referendum sample sheet asking to refer House Bill 1 to voters for approval or rejection.¹

15. The Secretary denominated the referendum 2026-RO04.

16. On November 13, 2025, the Secretary of State certified the official ballot title for 2026-RO04. It states:

Do the people of the state of Missouri approve the act of the General Assembly entitled “House Bill No. 1 (2025 Second Extraordinary Session),” which repeals Missouri’s existing gerrymandered congressional plan that protects incumbent politicians, and replaces it with new congressional boundaries that keep more cities and counties intact, are more compact, and better reflects statewide voting patterns?

State and local governmental entities estimate no costs or savings

¹ Plaintiff von Glahn submitted sample sheets prior to September 29, 2025 and the Secretary unlawfully rejected those sample sheets. They are the subject of the litigation styled *People Not Politicians v. Hoskins*, No. 25AC-CC07128

COUNT I- THE SUMMARY STATEMENT IS UNFAIR AND INSUFFICIENT

17. Plaintiffs incorporate by reference all preceding paragraphs.
18. The Secretary of State is responsible for preparing the summary statement of the measure. *See* § 116.334, RSMo.
19. The summary statement may be neither intentionally argumentative nor likely to create prejudice either for or against the proposed measure. *Id.*
20. That summary statement must be a true and impartial statement of the purposes of the proposed measure.
21. The summary statement for 2026-RO04 uses language which is intentionally argumentative and likely to create prejudice for the measure.
22. The summary statement for 2026-RO04 is not a true and impartial statement of the purposes of the measure.
23. House Bill 1 is just a list of voting districts separated into congressional districts. The Secretary's summary statement does not reflect this.
24. Instead, the summary is an inaccurate, insufficient, biased, and unfair political description and campaign for House Bill 1.
25. The Secretary uses the word "gerrymandered" to describe the 2022 congressional plan House Bill 1 replaced.
26. The word "gerrymandered" is biased, intentionally argumentative, and likely to create prejudice for approving House Bill 1.

27. It is also biased, intentionally argumentative, and likely to create prejudice to describe the 2022 congressional plan replaced by House Bill 1 as “protect[ing] incumbent politicians.”

28. The summary statement for 2026-RO04 is unfair and insufficient because it implies that the new congressional boundaries enacted in House Bill 1 will not create gerrymandered districts and will not protect incumbents. This is not accurate.

29. The new congressional boundaries enacted by House Bill 1 are gerrymandered districts.

30. The new congressional boundaries enacted by House Bill 1 protect incumbents.

31. It is inaccurate, unfair, and insufficient to describe House Bill 1 as enacting “new congressional boundaries that keep more cities and counties intact.”

32. House Bill 1 divides municipalities in new ways and across new congressional districts, compared to the congressional district boundaries adopted in 2022.

33. The summary statement inaccurately describes House Bill 1 as enacting new congressional districts that “are more compact” and “better reflect[] statewide voting patterns.” This is unfair and insufficient.

34. House Bill 1’s districts are not “more compact” than the 2022 congressional districts.

35. House Bill 1's districts do not "better reflect[] statewide voting patterns" as compared to the 2022 congressional districts.

36. The Secretary did not do his job. A summary statement should be a neutral and fair summary of what the measure does. The summary statement for 2026-R004 is not.

37. The Secretary's summary for 2026-R004 is unfair and insufficient.

COUNT II- ALTERNATIVELY, A SUMMARY STATEMENT IS NOT AUTHORIZED FOR REFERENDUM PETITIONS

38. Plaintiffs incorporate by reference all preceding paragraphs.

39. Section 116.334, RSMo requires the Secretary of State to draft a summary statement for an initiative petition. It does not authorize or allow the Secretary to draft a summary statement for a referendum.

40. The Secretary drafted and certified a summary statement for 2026-R004 in violation of Section 116.334, RSMo.

41. The summary statement should be declared invalid and unlawful.

WHEREFORE, Plaintiffs pray that this Court:

a. declare 2026-R004's summary statement unfair and insufficient and remand it to the Secretary of State to draft a new, compliant summary statement; or

b. Alternatively, declare that the summary statement is invalid and unlawful because the Secretary is not authorized to draft a summary statement for a referendum; and

c. for any such other relief this Court deems just and proper.

Respectfully submitted,

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