

IN THE CIRCUIT COURT OF COLE COUNTY
STATE OF MISSOURI

PEOPLE NOT POLICIANS;)
RICHARD VON GLAHN,)

Plaintiffs,)

v.)

Case No. 25AC-CC08724

DENNY HOSKINS, in his official)
Capacity as the Missouri Secretary)
of State)

Defendant.)

RESPONDENT'S ANSWER

Respondent Secretary of State Denny Hoskins ("the Secretary") provides the following Answer to the Petition of Plaintiffs People Not Politicians and Richard von Glahn:

PARTIES

Plaintiff People Not Politicians

1. The Secretary is without sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 1; the Secretary therefore denies them.

2. The Secretary is without sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 2; the Secretary therefore denies them.

Plaintiff Richard von Glahn

3. The Secretary is without sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 3; the Secretary therefore denies them.

4. The Secretary admits that Plaintiff von Glahn has submitted the referendum petitions that are the subject of this action. To the extent further response is required, the Secretary denies any remaining allegations in Paragraph 4.

5. The Secretary admits that Plaintiffs challenge House Bill 1's summary statement and request a new one; the Secretary, however, denies that Plaintiffs are entitled to any relief. The Secretary further denies that the existing summary statement is in any way not legally complaint. To the extent further response is required, the Secretary denies any remaining allegations in Paragraph 5.

Respondent Secretary of State Denny Hoskins

6. Admit.

7. Admit.

8. Admit.

9. Admit.

FACTUAL ALLEGATIONS

10. Admit.

11. Admit.

12. The Secretary admits that on September 12, 2025, both Chambers of the General Assembly concurred on the cited bill. To the extent further response is required, the Secretary denies any remaining allegations in Paragraph 12.

13. The Secretary admits that the Petition submitted in this action has an Exhibit A attached, which speaks for itself. The Secretary denies any allegation in Paragraph 13 inconsistent therewith.

14. The Secretary admits that Plaintiff von Glahn submitted a referendum sample sheet on September 29, 2025 that speaks for itself. The Secretary denies any allegation in Paragraph 14 inconsistent therewith.¹

15. Admit.

16. Admit.

COUNT I

17. The Secretary incorporates by reference his answers in Paragraphs 1 through 16 as if fully set forth herein.

18. Paragraph 18 consists of a legal conclusion that requires no further answer. To the extent a further answer is required, the Secretary asserts that Section 116.334, RSMo, speaks for itself as to its contents and denies any allegations inconsistent therewith. The Secretary denies any remaining allegations in Paragraph 18.

19. Paragraph 19 consists of a legal conclusion that requires no further answer. To the extent a further answer is required, the Secretary asserts that Section 116.334, RSMo, speaks for itself as to its contents and denies any allegations inconsistent therewith. The Secretary denies any remaining allegations in Paragraph 19.

¹ With respect to Footnote 1, the Secretary admits that Plaintiffs brought a legal action against the Secretary styled *People Not Politicians v. Hoskins*, No. 25AC-CC07128, but the claims have no legal or factual merit. To the extent further response is required, the Secretary denies any remaining allegations in Footnote 1.

20. Paragraph 20 consists of a legal conclusion that requires no further answer. To the extent a further answer is required, the Secretary denies the allegations in Paragraph 20.

21. Deny.

22. Deny.

23. The Secretary admits only that House Bill 1 contains a list of voting districts separated into congressional districts. The Secretary denies any remaining allegations in Paragraph 23

24. Deny.

25. The Secretary admits that the summary statement contains the word “gerrymandered.” The Secretary denies any remaining allegations in Paragraph 25.

26. Deny.

27. The Secretary admits that the summary statement contains the phrase “protects incumbent politicians.” The Secretary denies any remaining allegations in Paragraph 27.

28. Deny.

29. Deny.

30. Deny.

31. The Secretary admits that the summary statement contains the phrase “new congressional boundaries that keep more cities and counties intact.” The Secretary denies any remaining allegations in Paragraph 31

32. The Secretary admits that HB1 made some changes to congressional district boundaries adopted in 2022 but denies that fact makes the Secretary's summary statement inaccurate, unfair, or insufficient. The Secretary denies any remaining allegations in Paragraph 32.

33. The Secretary admits that the summary statement contains the phrases "are more compact" and "better reflects statewide voting patterns." The Secretary denies any remaining allegations in Paragraph 33.

34. Deny.

35. Deny.

36. The assertion that "[a] summary statement should be a neutral and fair summary of what the measure does" constitutes a legal conclusion that requires no further answer. To the extent a further answer is required, the Secretary denies the allegations in Paragraph 36.

37. Deny.

COUNT II

38. The Secretary incorporates by reference his answers in Paragraphs 1 through 37 as if fully set forth herein.

39. Paragraph 39 consists of a legal conclusion that requires no further answer. To the extent a further answer is required, the Secretary asserts that Section 116.334, RSMo, speaks for itself as to its contents and denies any allegations inconsistent therewith. The Secretary denies any remaining allegations in Paragraph 39.

40. The Secretary admits to drafting and certifying a summary statement for 2026-R004 but denies that the statement is in violation of Section 116.334, RSMo. The Secretary denies any remaining allegations in Paragraph 40.

41. Deny.

Answering the WHEREFORE clause in the Petition, the Secretary denies any allegations therein and denies that Petitioner is entitled to the requested relief.

GENERAL DENIAL OF CLAIMS

1. The Secretary denies all allegations made in any header, footnote, or non-numbered paragraph of the petition, and denies that Plaintiffs have alleged any lawful claim against him or the State.

AFFIRMATIVE DEFENSES

2. The Secretary of State's summary statement portion of the official ballot title is fair and sufficient under Sections 116.190 and 116.334 and Missouri case law interpreting those provisions. For those reasons, Plaintiffs have failed to state a claim upon which relief can be granted, and the Secretary is also entitled to judgment on the claims in Plaintiffs' Petition.

3. The Secretary reserves the right to assert any additional defenses that may become apparent as the litigation progresses.

Date: December 22, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on December 22, 2025, a true and accurate copy of the foregoing was electronically filed by using the Court's CM/ECF system to be served via operation of the Court's electronic filing system upon all counsel of record.

/s/ Madeline S. Lansdell