

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 FIRST AMENDED ANSWER

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

PARTIES

Plaintiff People Not Politicians

1. Admit.

2. Admit.

Plaintiff Richard von Glahn

3. Admit.

4. Admit.

5. Admit.

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.

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.

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.

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. Admit.

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. The Secretary admits that the term “gerrymandered” can be viewed as politically charged. In this instance, the Secretary admits that the use of the word “gerrymandered” is argumentative and likely to create prejudice or bias for the measure. The Secretary denies any remaining allegations in Paragraph 26.

27. The Secretary admits that the summary statement contains the phrase “protects incumbent politicians.” The Secretary also admits that, as written, the phrase “protects incumbent politicians” is argumentative and likely to create prejudice. 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 admits that the statement is not fair and denies all other allegations in Paragraph 36.

37. The Secretary admits that, as written, the summary for 2026-R004 is unfair. The Secretary denies all remaining allegations in Paragraph 37.

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 admits the Plaintiffs are entitled to the requested relief in subsection (a). The Secretary denies

any additional allegations therein and denies that Petitioner is entitled to the requested relief in subsection (b).

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 except where specifically admitted.

AFFIRMATIVE DEFENSES

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

Date: January 28, 2026

Respectfully submitted,

CATHERINE HANAWAY
Attorney General

Louis J. Capozzi, III, #77756
Solicitor General
Kathleen Hunker, *admitted pro hac vice*
Principal Deputy Solicitor General
/s/ Madeline S. Lansdell
Madeline S. Lansdell, #78358
Assistant Solicitor General

Office of the Attorney General
815 Olive Street, Suite 200
St. Louis, MO 63101
Tel. (573) 645-9662
Fax (573) 751-0774
Kathleen.Hunker@ago.mo.gov
Madeline.Lansdell@ago.mo.gov
Counsel for the Respondent

CERTIFICATE OF SERVICE

I hereby certify that on January 28, 2026, 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