

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

MISSOURI GENERAL ASSEMBLY,

DENNY HOSKINS, IN HIS OFFICIAL
CAPACITY AS MISSOURI SECRETARY OF
STATE,

&

STATE OF MISSOURI,

Plaintiffs,

v.

Case No.

RICHARD VON GLAHN

&

PEOPLE NOT POLITICIANS,

Defendants.

COMPLAINT

Plaintiffs, the Missouri General Assembly, Missouri Secretary of State Denny Hoskins, and the State of Missouri, for their Complaint respectfully allege as follows:

INTRODUCTION

1. The U.S. Constitution expressly vests the power to apportion federal congressional districts in the state legislatures, with only Congress itself expressly given oversight authority over state legislatures. U.S. Const. art. I, § 4, cl. 1. Yet in Missouri, Defendants, Richard von Glahn and People Not Politicians, have initiated a referendum

process that would strip the General Assembly of its authority over redistricting. This unprecedented act violates both the U.S. and Missouri Constitutions.

2. Just two years ago, the U.S. Supreme Court reaffirmed the core authority of state legislatures to draw congressional districts for the U.S. House of Representatives. The court emphasized how other state-governmental actors “do not have free rein” to transgress state legislatures’ authority to apportion congressional districts. *Moore v. Harper*, 600 U.S. 1, 34 (2023). For good reason: The U.S. Constitution’s Elections Clause uniquely bestows on state legislatures the power to set the times, places, and manner of federal elections, including reapportionment authority—with only Congress itself being the enumerated overseer of legislatures’ actions. *See* U.S. Const. art. I, § 4, cl. 1.

3. Despite that constitutional language, some state constitutions have expressly transferred authority over federal redistricting from state legislatures to other entities—like independent redistricting commissions. *See, e.g., Ariz. State Leg. v. Ariz. Indep. Redistricting Comm’n*, 576 U.S. 787, 796–98 (2015). Jurists have disagreed on whether such delegations are constitutional. *See id.* at 826 (Roberts, C.J., dissenting).

4. This case does not require this Court to revisit that debate. Where the U.S. Constitution expressly vests authority in a particular actor, that authority cannot be taken away without a clear and express statement. *See Moore*, 600 U.S. at 34–36. In *Arizona State Legislature*, for example, the Arizona Constitution *did* “directly and immediately” transfer the Arizona’s Legislature’s authority over redistricting to another entity. 576 U.S. at 801. And in *State of Ohio ex rel. Davis v. Hildebrant*, the Supreme Court considered a federal constitutional challenge under the Guarantee Clause to

Ohio’s redistricting scheme *only after* concluding that state law “ma[de] it clear” that the legislature had been partially divested of its authority over federal redistricting. 241 U.S. 565, 567–68 (1916) (holding it was “obvious” that state law was “conclusive” on that point).

5. Such clear-statement rules are fixtures of American constitutional law because they ensure that the relevant governmental actors actually intended to push the boundaries and potentially upset the careful balances struck by the U.S. Constitution’s Framers. *See West Virginia v. EPA*, 597 U.S. 697, 736–37 (2022) (Gorsuch, J., concurring); Amy Coney Barrett, *Substantive Canons and Faithful Agency*, 90 B.U. L. Rev. 109, 166–67 (2010). For example, even though the Constitution vests legislative power in Congress, courts allow Congress to delegate major policy decisions to the Executive Branch—but only if Congress provides a clear statement of authority. *West Virginia*, 597 U.S. at 723; *id.* at 746–49 (Gorsuch, J., concurring); *Paul v. United States*, 140 S. Ct. 342, 342 (2019) (statement of Kavanaugh, J., respecting denial of certiorari). Similarly, courts demand a clear statement before assuming Congress intended to legislate in areas of traditional state authority—to protect the U.S. Constitution’s commitment to federalism. *See Sackett v. EPA*, 598 U.S. 651, 679–80 (2023); *Gregory v. Ashcroft*, 501 U.S. 452, 460 (1991).

6. Defendants cannot identify any language that “makes it clear” that the Missouri Constitution transfers authority over federal redistricting away from the General Assembly. *Hildebrant*, 241 U.S. at 568. While Missouri has chosen to allow voters to revisit legislation passed by the General Assembly, nothing in the Missouri

Constitution expressly says that federal congressional reapportionment may be subjected to a referendum. *See* Mo. Const. art. III, §§ 49, 52(a). In other words, the people of Missouri have never made the conscious choice to undermine the Framers' decision to vest this State's legislature with the reapportionment authority.

7. Defendants therefore have no legal basis to proceed with their referendum. This Court should declare that such a referendum would violate both the U.S. and Missouri Constitutions.

PARTIES

I. Plaintiffs

8. Plaintiff Missouri General Assembly is the legislative branch of Missouri's government. *See* Mo. Const. art. III, § 1. The People of Missouri directly elect the General Assembly.

9. Plaintiff Denny Hoskins is the Missouri Secretary of State.

10. Plaintiff State of Missouri is a sovereign State of the United States of America.

11. Plaintiffs bring this action to prevent Defendants Richard von Glahn and People Not Politicians from unconstitutionally usurping the General Assembly's vested authority to reapportion the State of Missouri's congressional representation.

12. Plaintiffs come to this Court asking for an order barring Defendants from seeking to overturn the General Assembly's reapportionment of Missouri's congressional representation via a statewide referendum, a direct imposition on the General Assembly's authority under Article I, § 4, cl. 1, of the U.S. Constitution, and Article III, § 45 of the Missouri Constitution.

13. States and legislatures can seek, in the federal courts, to protect the congressional-apportionment authority—a power vested in the state legislatures by Article I, § 4, cl. 1, of the U.S. Constitution. *See, e.g., Ariz. State Leg.*, 576 U.S. at 803–04.

14. Plaintiffs sue to prevent the dedication of the State’s resources to a referendum whose aim is unconstitutional and at odds with the General Assembly’s vested authority over federal congressional reapportionment.

15. Plaintiffs need not wait for the outcome of the referendum before seeking to protect the General Assembly’s exercise of authority under Article I, § 4, cl. 1, of the U.S. Constitution. With the initiative process already commenced, the State must presently expend its resources on an initiative whose aim is unlawful.

II. Defendants

16. Defendant Richard von Glahn is a natural person seeking to commence a referendum that would overturn the General Assembly’s latest reapportionment of Missouri’s congressional representation.

17. Mr. von Glahn submitted a referendum petition challenging the General Assembly’s recent redistricting bill to the Secretary of State.

18. On information and belief, Mr. von Glahn resides and has engaged in actions pertaining to his pursuit of the referendum at 9 Wilshire Terrace, Webster Grove, MO 63119.

19. On information and belief, Mr. von Glahn is the Executive Director of Defendant People Not Politicians.

20. Defendant People Not Politicians is an organization dedicated to, among other things, opposing the Missouri General Assembly's actions regarding reapportionment.¹

21. On information and belief, Defendant People Not Politicians is a non-profit political and advocacy organization operating within the State of Missouri.

22. On information and belief, Defendant People Not Politicians is soliciting donations from politically progressive individuals and organizations from around the country to fund its referendum efforts.

JURISDICTION AND VENUE

23. This Court has subject matter jurisdiction over the federal claims under 28 U.S.C. § 1331 because a provision of the U.S. Constitution governs the disposition of this case.

24. This Court has supplemental jurisdiction over the state-constitutional claim under 28 U.S.C. § 1367.

25. This Court has the authority to issue the requested declaratory relief under 28 U.S.C. §§ 2201–2202 and this Court's inherent equitable authority.

26. This Court has personal jurisdiction over Defendant Richard von Glahn because, on information and belief, Mr. von Glahn resides and has engaged in actions pertaining to this case at 9 Wilshire Terrace, Webster Grove, MO 63119.

27. Venue is proper in this judicial district under 28 U.S.C. § 1391(b) because Defendant Richard von Glahn resides and has undertaken efforts to secure an unlawful referendum within this District and the Eastern Division.

¹ See People Not Politicians, <https://peoplenotpoliticiansmo.org/#about>.

28. Exercising specific personal jurisdiction over Defendant People Not Politicians is proper under the Due Process Clause because Defendant has such a deep and systemic presence in Missouri that it can reasonably foresee being sued in Missouri. *See Ford Motor Co. v. Mont. Eighth Judicial Dist. Court*, 592 U.S. 351, 364–65 (2021).

29. Venue is proper in this judicial district under 28 U.S.C. § 1391(b) respecting People Not Politicians because Plaintiffs allege that the Defendant has undertaken efforts to secure an unlawful referendum within this District and Division.

FACTS COMMON TO ALL COUNTS

I. The General Assembly Reapportions Missouri’s Congressional Representation.

30. On August 29, 2025, Missouri’s Governor called a special session of the General Assembly to, among other things, “enact legislation establishing updated congressional districts.”²

31. The General Assembly convened its special session in September, with the House of Representatives opening the session on September 3, 2025. The House of Representatives approved the new apportionment on September 9, 2025.

32. The Missouri Senate concurred and passed the redistricting bill on September 12, 2025.

33. The Missouri Governor signed the redistricting bill on September 28, 2025.

² *Governor Kehoe Announces Special Session on Congressional Redistricting and Initiative Petition Reform*, Off. of Gov. Mike Kehoe (Aug. 29, 2025), <https://governor.mo.gov/press-releases/archive/governor-kehoe-announces-special-session-congressional-redistricting-and>.

II. Defendants Initiate Their Effort to Subject the Reapportionment to a Referendum.

34. In Missouri, citizens can seek “to approve or reject” legislation by the General Assembly via a referendum. Mo. Const. art. III, § 49; *see also Ariz. State Leg.*, 576 U.S. at 794 (explaining how “the referendum serves as a negative check” by voters on the legislature’s actions).

35. Doing so first requires submitting a petition to the Plaintiff Secretary of State for review. *See* Mo Rev. Stat. § 116.332.1. The Secretary has limited discretion to reject the proposal. *See id.*

36. Following review by the Secretary, the petition must garner “five percent of legal voters in each of two-thirds of congressional districts in the state.” Mo. Const. art. III, § 52(a). If a petition receives the necessary signatures, the challenged law cannot take effect until a referendum occurs. *Id.* § 52(b).

37. After the passage of the new congressional map, but before the Governor signed the reapportionment into law, Defendants began their efforts to subject the new map to a citizen referendum.³

38. On September 12, 2025, Defendants submitted their petition for a referendum to the Secretary of State.

³ *See* Jason Hancock, *Three Lawsuits and a Referendum: New Missouri Congressional Map Faces Multiple Attacks*, Mo. Indep. (Sept. 15, 2025), <https://missouriindependent.com/2025/09/15/three-lawsuits-and-a-referendum-new-missouri-congressional-map-faces-multiple-attacks/>.

39. In a public statement, Mr. von Glahn made the initiative’s aim clear: “The people who are going to put this issue on the ballot are Missourians. The people who are going to have the final say on this are Missourians.”⁴

40. Similarly, Defendant People Not Politicians expressed its intentions of pursuing a referendum. It called the reapportionment “an illegal gerrymandering scheme that is nothing more than an unconstitutional power grab.”⁵ It then said, in no uncertain terms, “*We believe that Missouri voters—not politicians—should have the final say.* We have filed a citizen’s referendum to gather signatures to put this unjust map before voters on an upcoming ballot.”⁶

41. The organization then asks visitors of its website to “Donate Now”—without limiting the request solely to Missouri voters or residents.⁷

42. Defendants have already seen great success in securing support and resources from out-of-state partisan special interests. Notably, the Democratic National Committee has promised to devote staff and monetary support to the referendum.⁸

⁴ Charlie Keegan, *Opponents to Missouri Redistricting Identify 2 Paths to Block Bill*, KSHB 41 (Sept. 15, 2025), <https://www.kshb.com/news/local-news/opponents-to-redistricting-going-down-2-paths-to-block-bill>.

⁵ People Not Politicians, *supra* note 1.

⁶ *Id.* (emphasis in original).

⁷ *Id.*

⁸ Jason Rosenbaum, *Democratic National Committee Will Contribute to Blocking Missouri Congressional Map*, St. Louis Pub. Radio (Sept. 29, 2025), <https://www.stlpr.org/government-politics-issues/2025-09-29/democratic-national-committee-will-contribute-to-blocking-missouri-congressional-map>.

III. Plaintiffs' Ongoing Commitments Regarding the Initiative.

43. Because Defendants have initiated the referendum process, the Secretary of State in particular and the State in general are currently being forced to commit resources in response.

44. Defendants' filing a petition seeking a referendum triggers several ongoing responsibilities that will force the committal of resources by the Secretary of State and the State as a whole. The process begins with submission of a "sample sheet" of the initiative to the Secretary of State. Mo Rev. Stat. § 116.332.1. Missouri law requires the Secretary and the Attorney General to "review the petition for sufficiency as to form and approve or reject the form of the petition, stating the reasons for rejection, if any." *Id.* The Secretary also refers the petition to the State Auditor "for purposes of preparing a fiscal note and fiscal note summary." *Id.* The Secretary must post the proposed measure on State's website within two business days of receipt. *Id.* § 116.332.2. The Secretary has fifteen days to review the petition. *Id.* § 116.332.4. As noted, Defendants have already filed their sample sheet with the Secretary.

45. Even before the Secretary issued a decision on the form of the proposed referendum, Defendants sued over the Secretary's review process. *See* Pet., *People Not Politicians v. Hoskins*, 25AC-CC07128 (Cir. Ct. Cole Cnty. Sept. 18, 2025). The State is currently being forced to expend substantial resources litigating that case.

46. A host of new obligations occurs when a proponent submits a final petition with signatures to the Secretary of State. All of these will force the Secretary to reallocate scarce resources and personnel to handling the referendum petition. First, the Secretary will need to "examine the petition to determine whether it complies with the Constitution

of Missouri and with this chapter.” *Id.* § 116.120.1. Second, responsibility for verifying signatures falls with the Secretary. *See id.* § 116.120. The Secretary may also involve election authorities in checking signatures. *See id.* § 116.130. Once the Secretary makes a determination regarding whether a petition has received the necessary number of non-fraudulent signatures, he must then issue a certificate of sufficiency or insufficiency. *See id.* § 116.150. In the latter case, the Secretary must detail “the reason for the insufficiency.” *Id.* § 116.150.2. Time limits govern when the Secretary must make a decision. *See id.* § 116.150.3.

47. Even if the Secretary finds a petition sufficient, the resource commitments do not end. Missouri law requires the State to hold a public hearing and take comments on any petition deemed to have sufficient signatures. *See id.* § 116.153. The Secretary will then be responsible for preparing the ballot initiate. *See id.* § 116.220.

48. If a referendum petition gains enough signatures to qualify for a vote before the people, the challenged law is frozen pending the public vote. Mo. Const. art. III, § 52(b). Thus, the General Assembly loses its authority over redistricting pending that public vote. And the entire State would be plunged into legal uncertainty over which legislative maps would govern Missouri elections in 2026.

49. Given these state-law requirements, the Secretary of State and the State as a whole are currently forced to expend resources facilitating a referendum initiative that they believe unconstitutionally deprives the General Assembly of its vested and previously undisturbed authority to reapportion the State’s federal congressional representation. This creates a sufficient injury-in-fact for justiciability purposes. *See,*

e.g., *New York v. U.S. Dep’t of Homeland Sec.*, 969 F.3d 42, 59–60 (2d Cir. 2020) (holding “States’ alleged economic harms are sufficiently concrete and imminent to constitute injury in fact” for preliminary injunction); *City of Chicago v. Matchmaker Real Estate Sales Ctr., Inc.*, 982 F.2d 1086, 1095 (7th Cir. 1992) (holding that the government plaintiff had standing because of its legally required committal of resources); *see also* *Axon Enter., Inc. v. FTC*, 598 U.S. 175, 191 (2023) (explaining that “here-and-now injury” occurs when the plaintiff alleges being subjected to an unconstitutional process); *Ariz. State Leg.*, 576 U.S. at 800–01 (explaining that government need not first violate the law to gain standing); *BTS Holdings, LLC v. OSHA*, 17 F.4th 604, 618 (5th Cir. 2021) (explaining that “the diversion of resources” and burdens on the State’s constitutionally granted role qualify as irreparable harms). Likewise, an order from this Court confirming that Defendants’ proposed referendum is unconstitutional and enjoining their actions would redress the harms alleged here. *See Ariz. State Leg.*, 576 U.S. at 800 (recognizing as much and concluding that the case met standing and ripeness requirements).

50. Plaintiffs also do not need to wait for any future actions by Defendants. As noted, Defendants have already filed their sample sheet with the Secretary of State—the first step in the initiative process, and Defendants are litigating the manner in which the Secretary handled their first sample sheet. While that litigation is ongoing, Defendants submitted an additional sample sheet, which the Secretary of State approved as to form, thus ensuring the referendum process will continue. *See Ohio Civil Rights Comm’n v. Dayton Christian Schs., Inc.*, 477 U.S. 619, 625 n.1 (1986) (recognizing that

the filing of an administrative action threatening harm to the plaintiffs' interests shows that the controversy is ripe). Hence, Defendants will continue forcing the State to allocate resources on the referendum per the governing statutes, and through their ongoing litigation against the Secretary of State. These resource expenditures should not occur because the referendum's ultimate aim—depriving the General Assembly of its vested authority without a clear statement—is unconstitutional. *See Neb. Pub. Power Dist. v. MidAm. Energy Co.*, 234 F.3d 1032, 1039–40 (8th Cir. 2000) (recognizing a claim was ripe because of the hardship that delay would impose).

IV. The Effort at a Ballot Initiative Has Violated, Is Violating, and Will Continue to Violate, the Federal and Missouri Constitutions.

51. Absent a clear statement in the Missouri Constitution transferring the apportionment power from the General Assembly to a ballot referendum, Defendants cannot proceed with their referendum. The Elections Clause provides that, as an initial matter, the “Times, Places and Manner of holding Elections for Senators and Representatives, shall be prescribed in each State by the Legislature thereof.” U.S. Const. art. I, § 4, cl. 1. The General Assembly’s “vested authority is not just the typical legislative power exercised pursuant to a state constitution. Rather, when a state legislature enacts statutes governing [federal] elections, it operates ‘by virtue of a direct grant of authority’ under the United States Constitution.” *Carson v. Simon*, 978 F.3d 1051, 1060 (8th Cir. 2020) (per curiam).

52. In choosing to specifically entrust state legislatures with authority over federal congressional redistricting, the Framers of the U.S. Constitution ensured that such power would be exercised by officials “accountable by the people for the rules they write

or fail to write.” *Democratic Nat’l Comm. v. Wis. State Leg.*, 141 S. Ct. 28, 29 (2020) (Gorsuch, J., concurring in denial of application to vacate stay). They also ensured that redistricting decisions would reflect “the collective wisdom of the whole people”—as expressed through the people’s elected representatives. *Id.*

53. While the U.S. Supreme Court has recognized that express state constitutional amendments can divest legislatures of their apportionment power, the court has never held that a general referendum provision can curtail the legislature’s exercise of that authority. *See Ariz. State Leg.*, 576 U.S. at 814 (holding that a State can adopt an express constitutional provision transferring the legislature’s apportionment authority to an independent commission). Because the Framers of the Federal Constitution made “a deliberate choice” to vest reapportionment power in state legislatures, other state actors cannot use the vagaries of state law to transfer that power elsewhere. *Moore*, 600 U.S. at 34. Hence, state law must plainly circumscribe the legislature’s federal congressional-apportionment authority. *Cf. id.* at 34–36 (holding that state “courts do not have free rein” to intrude upon the legislature’s apportionment power absent “a fair reading” of state law limiting the power); *Carson*, 978 F.3d at 1060 (discussing how state officials cannot “override” the state legislature’s exercise of power under the Elections Clause).

54. Moreover, serious constitutional doubt persists about whether state-ballot initiatives can ever divest state legislatures of their congressional-apportionment authority. The “text, structure, or history of the Constitution” plainly show that Article I, Section 4 deliberately vests “the ‘Legislature,’” not “the people” with the power to reapportion congressional representation. *Ariz. State Leg.*, 576 U.S. at 825 (Roberts,

C.J., dissenting). “Direct lawmaking by the people was ‘virtually unknown when the Constitution of 1787 was drafted.’” *Id.* at 793 (majority opinion). And the U.S. Supreme Court has never upheld the use of a ballot referendum to nullify a legislature’s congressional reapportionment against an Elections Clause challenge. *See id.* at 840 (Roberts, C.J., dissenting) (explaining how the only instance where the Supreme Court considered the use of such a referendum was in the context of a Guarantee Clause challenge in *Hildebrant*).⁹

55. Clear-statement rules are fixtures of American law where doubt persists regarding the exercise of authority under the U.S. Constitution. For example, the U.S. Supreme Court declined to find that Congress intended to use its power under the Commerce Clause to impose employment regulations on state-government officials when the federal statute did not expressly say that it applied to state officers. *See Gregory*, 501 U.S. at 464. The Court mandated a clear statement from Congress despite a prior holding that Congress possessed authority to regulate state employees. *See id.* (citing *Garcia v. San Antonio Metro. Transit Auth.*, 469 U.S. 528 (1985)). Likewise, given non-delegation concerns, the Supreme Court has long required that administrative agencies point to a specific grant of statutory authority before exercising some significant authority. *See West Virginia*, 597 U.S. at 721 (“[O]ur precedent teaches that there are

⁹ Plaintiffs preserve their argument that *Arizona Independent Redistricting Commission* was wrongly decided, and thus should be overruled. *See, e.g., Ariz. State Leg.*, 576 U.S. at 825 (Roberts, C.J., dissenting). However, even under that precedent, this Court can grant Plaintiffs all requested relief. Plaintiffs also preserve their argument that even if there is no clear-statement rule (or that it is satisfied), this case is distinguishable from *Arizona Independent Redistricting Commission*.

‘extraordinary cases’ that call for a different approach—cases in which the ‘history and the breadth of the authority that [the agency] has asserted,’ and the ‘economic and political significance’ of that assertion, provide a ‘reason to hesitate before concluding that Congress’ meant to confer such authority.’” (second alteration in original)); *see also id.* at 740 (Gorsuch, J., concurring) (explaining the doctrine’s history).

56. The reasons for demanding a clear statement in the Missouri Constitution apply with equal force to the assertion that the referendum process permits usurping the General Assembly’s authority over federal congressional apportionment. As explained, the U.S. Constitution delegates that authority specifically to the General Assembly—with only Congress itself being granted the power to override the General Assembly’s actions. *See* U.S. Const. art. I, § 4, cl. 1. Given this evident construction, constitutional doubt remains as to the nature and extent of other state actors’ ability to transgress the legislature’s congressional-reapportionment power. *See Moore*, 600 U.S. at 34 (declining to delineate a specific standard, but explaining that state courts “do not have free rein” to revisit legislatures’ congressional reapportionments); *Ariz. State Leg.*, 576 U.S. at 825 (Roberts, C.J., dissenting) (summarizing the textual, structural, and historical concerns of divesting state legislatures of their apportionment authority); *Carson*, 978 F.3d at 1060 (“[A] legislature’s power in this area is such that it ‘cannot be taken from them or modified’ even through ‘their state constitutions.’” (quoting *McPherson v. Blacker*, 146 U.S. 1, 35 (1892))). Federal courts have already taken great care to ensure that other state actors—absent “conclusively established” plain direction—do not hamper the legislature’s Elections Clause authority in the name of

state law. *See Hildebrant*, 241 U.S. at 568; *see also Moore*, 600 U.S. at 36 (emphasizing how other state actors may not “arrogate to themselves the power vested in state legislatures to regulate federal elections” without express authority); *Carson*, 978 F.3d at 1060 (concluding that the legislature did not delegate authority to make major election changes through “a general statute in the election code”). At the very least, the novelty of Defendants’ efforts to place the General Assembly’s congressional redistricting on the ballot raises alarm—especially because the U.S. Supreme Court has never passed on the question in the context of an Elections Clause challenge. *See Ariz. State Leg.*, 576 U.S. at 825 (Roberts, C.J., dissenting) (discussing *Hildebrant*, 241 U.S. at 569).

57. Given its novelty and lack of textual support, Defendants’ efforts to displace the Federal Constitution’s vesting of redistricting authority in the General Assembly is unlawful under the Elections Clause. The Missouri Constitution’s referendum provision does not expressly say that a referendum can overturn the exercise of the General Assembly’s federal redistricting decisions. To the contrary, the Missouri Constitution specifically vests the General Assembly with the power to divide the State into congressional districts. *See Mo. Const. art. III, § 45* (stating General Assembly “shall” perform this function). Given these provisions, Missouri has not yet made a deliberate and clear choice to override the Elections Clause’s vesting the General Assembly with congressional apportionment authority. *See Ariz. State Leg.*, 576 U.S. at 817 (emphasizing how the State had made the deliberate choice of reallocating that authority to an independent commission).

58. And Missouri should have a chance to make that knowing choice before this unprecedented effort proceeds. Subjecting Missouri’s congressional redistricting to ballot referenda will invite chaos—driven by out-of-state special interests looking to gain a partisan advantage in Congress. If Defendants succeed in using the referendum, every apportionment decision going forward could now become subject to a referendum. In effect, this could create apportionment paralysis—where the General Assembly is unable to implement a congressional map because successive referendum efforts nullify them. This threatens to wreak havoc on the General Assembly’s basic obligations to reapportion congressional districts after each census. *See Wesberry v. Sanders*, 376 U.S. 1, 7–8 (1964).

59. The problem runs even deeper than that. Under Defendants’ interpretation of the Missouri Constitution, nothing would stop a voter from proposing the federal congressional map *in the first instance*—thus entirely cutting the General Assembly out of the redistricting process. The provision of the Missouri Constitution governing citizen-proposed statutory initiatives is worded—in all material respects—identically to the referendum provision. *See* Mo. Const. art. III, §§ 49–53. That provision just generally refers to “laws”—without any specific reference to federal redistricting bills. *See id.* So, under Defendants’ logic, voters—backed by out-of-state money—can just seize total control of the federal redistricting process.

60. The U.S. Constitution forecloses Defendants’ legal theory and actions. By vesting authority in the state legislature, the Elections Clause made a “compromise” that ensures a measure of deliberation, but in a representative body close to the people. *Ariz.*

State Leg. at 837 (Roberts, C.J., dissenting). Nor does the Elections Clause leave dissatisfied individuals—including Defendants—without recourse. They are free to take their concerns to Congress itself, which can reset the reapportionment rules under the Elections Clause. *See Wise v. Circosta*, 978 F.3d 93, 112 (4th Cir. 2020) (en banc) (Wilkinson and Agee, JJ., dissenting) (emphasizing “the brilliance” of giving Congress the authority to check state legislatures). They could also—through the citizen initiative process—seek to amend the Missouri Constitution to give the people a role in reviewing federal congressional maps through the referendum. *See* Mo. Const. art. III, §§ 49–51.

61. Finally, no history in Missouri supports Defendants’ efforts. The Missouri Supreme Court has never passed upon whether the referendum may be used to revisit federal congressional redistricting. While a closely divided Missouri Supreme Court upheld the use of referenda for apportionment of seats in the General Assembly, *see State ex rel. Gordon v. Becker*, 49 S.W.2d 146, 149 (Mo. 1932), that case is inapt. To start, federal and state legislative apportionment are governed by entirely separate provisions in the Missouri Constitution. Mo. Const. art. III, §§ 3, 7, 10 (state); *id.* art. III, § 45 (congressional). Additionally, *Gordon* never considered whether, per the Elections Clause, the General Assembly retained sole authority to apportion congressional districts. Because the authority to set federal congressional districts is a power delegated by the U.S. Constitution, federal congressional reapportionment implicates uniquely federal interests not reflected in state-legislative reapportionment. *See Moore*, 600 U.S. at 34 (“As in other areas where the exercise of federal authority or the vindication of federal rights implicates questions of state law, we have an obligation to

ensure that state court interpretations of that law do not evade federal law.”); *Carson*, 978 F.3d at 1060 (emphasizing how setting federal elections occurs “by virtue of a direct grant of authority’ under the United States Constitution”).

62. If anything, *Gordon* casts further doubt on Defendants’ legal theory. Chief Justice Atwood, in dissent, carefully analyzed Missouri constitutional history and concluded that the Missouri Constitution was not originally understood to extend the referendum *even* to state legislative apportionment. *See Gordon*, 49 S.W.2d at 152–57 (Atwood, C.J., dissenting) (contending that construction of prior Missouri constitutional provisions did not support the practice). And if such doubt exists for *state* legislative districting, it is hard to see how Defendants could satisfy the U.S. Constitution’s clear-statement rule applicable to federal congressional redistricting efforts.

63. Defendants’ actions seeking a referendum vote on the General Assembly’s 2025 federal congressional redistricting bill violates the U.S. Constitution and the Missouri Constitution. This Court should issue appropriate injunctive and declaratory relief.

CAUSES OF ACTION

Count 1 Violation of the U.S. Constitution Art. I, § 4, cl. 1

64. Plaintiffs incorporate by reference all preceding paragraphs as if fully set forth herein.

65. An actual controversy exists within this Court’s jurisdiction that would be resolved by a declaration of the rights and other legal relations of the parties in this action—namely, that Defendants’ efforts to initiate a referendum overturning the

General Assembly’s most recent congressional redistricting violates the Elections Clause of the U.S. Constitution.

66. The authority to prescribe the times, places, and manner of federal congressional elections arises exclusively under the Elections Clause of the U.S. Constitution.

67. The Constitution delegates and conveys the authority to prescribe the times, places, and manner of congressional elections only to “the Legislature” of “each State.” U.S. Const. art. I, § 4, cl. 1. This delegation is a broad grant of power to the General Assembly to prescribe the means by which congressional elections are held—including the redistricting of federal congressional districts.

68. Unless the Missouri Constitution plainly limits or divests the General Assembly of its congressional-redistricting authority, the General Assembly retains its power delegated by the Elections Clause.

69. With no express authority bestowed on the referendum process to overturn federal congressional apportionments, Defendants’ efforts to revisit the General Assembly’s exercise of its authority under the Elections Clause are unlawful.

70. For these reasons, the State and General Assembly are entitled to a judgment declaring Defendants’ actions unlawful under the Elections Clause of the U.S. Constitution. The Court should grant appropriate declaratory and injunctive relief.

Count 2
Violation of the Missouri Constitution
Art. III, § 45

71. Plaintiffs incorporate by reference all preceding paragraphs as if fully set forth herein.

72. As relevant, the Missouri Constitution provides that “the general assembly shall by law divide the State into districts corresponding with the number of [congressional] representatives to which it is entitled.” Mo. Const. art. III, § 45.

73. No other provision of the Missouri Constitution strips the General Assembly of its vested authority in redistricting the State’s congressional districts. *See* Mo. Const. art. III, § 52(a).

74. Because the Missouri Constitution does not specifically provide for referenda to countermand federal congressional apportionments, the State and General Assembly are entitled to a judgment declaring Defendants’ actions unlawful under the Missouri Constitution and preliminarily and permanently enjoining them from continuing to pursue any such referendum.

PRAYER FOR RELIEF

The Missouri General Assembly, Missouri Secretary of State Denny Hoskins, and the State of Missouri pray that this Court:

1. Declare, adjudge, and decree that the actions detailed herein are unlawful under Article I, § 4, cl. 1, of the U.S. Constitution and Article III, § 45 of the Missouri Constitution;

2. Issue declaratory relief stating that Defendants’ proposed referendum is unconstitutional;

3. Issue temporary, preliminary, and permanent injunctive relief to prevent Defendants from continuing to seek a referendum on the General Assembly’s redistricting bill; and

4. Award all other relief this Court deems equitable and just.

Dated: October 15, 2025

Respectfully submitted,

CATHERINE L. HANAWAY
ATTORNEY GENERAL

s/ Louis J. Capozzi III

Louis J. Capozzi III, #77756(MO)

Solicitor General

William James Seidleck, #77794(MO)

Principal Deputy Solicitor General

Graham Miller, #77656(MO)

Deputy Solicitor General

OFFICE OF THE ATTORNEY GENERAL

Old Post Office Building

815 Olive Street, Suite 200

St. Louis, MO 63101

Phone: (573) 645-9662

Louis.Capozzi@ago.mo.gov

William.Seidleck@ago.mo.gov

Graham.Miller@ago.mo.gov

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of this Complaint shall be served in accordance with Federal Rule of Civil Procedure 4.

s/ Louis J. Capozzi III

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Missouri General Assembly, Denny Hoskins in his official capacity as Secretary of State, State of Missouri

(b) County of Residence of First Listed Plaintiff Cole County
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Office of the Attorney General
815 Olive Street, Suite 200
St. Louis, MO 63101

DEFENDANTS

Richard von Glahn
People Not Politicians

County of Residence of First Listed Defendant St. Louis County
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | ☐ 1 | ☐ 1 | Incorporated or Principal Place of Business In This State | ☐ 4 | ☐ 4 |
| Citizen of Another State | ☐ 2 | ☐ 2 | Incorporated and Principal Place of Business In Another State | ☐ 5 | ☐ 5 |
| Citizen or Subject of a Foreign Country | ☐ 3 | ☐ 3 | Foreign Nation | ☐ 6 | ☐ 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
☐ 110 Insurance ☐ 120 Marine ☐ 130 Miller Act ☐ 140 Negotiable Instrument ☐ 150 Recovery of Overpayment & Enforcement of Judgment ☐ 151 Medicare Act ☐ 152 Recovery of Defaulted Student Loans (Excludes Veterans) ☐ 153 Recovery of Overpayment of Veteran's Benefits ☐ 160 Stockholders' Suits ☐ 190 Other Contract ☐ 195 Contract Product Liability ☐ 196 Franchise	PERSONAL INJURY ☐ 310 Airplane ☐ 315 Airplane Product Liability ☐ 320 Assault, Libel & Slander ☐ 330 Federal Employers' Liability ☐ 340 Marine ☐ 345 Marine Product Liability ☐ 350 Motor Vehicle ☐ 355 Motor Vehicle Product Liability ☐ 360 Other Personal Injury ☐ 362 Personal Injury - Medical Malpractice PERSONAL INJURY ☐ 365 Personal Injury - Product Liability ☐ 367 Health Care/Pharmaceutical Personal Injury Product Liability ☐ 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY ☐ 370 Other Fraud ☐ 371 Truth in Lending ☐ 380 Other Personal Property Damage ☐ 385 Property Damage Product Liability	☐ 625 Drug Related Seizure of Property 21 USC 881 ☐ 690 Other LABOR ☐ 710 Fair Labor Standards Act ☐ 720 Labor/Management Relations ☐ 740 Railway Labor Act ☐ 751 Family and Medical Leave Act ☐ 790 Other Labor Litigation ☐ 791 Employee Retirement Income Security Act IMMIGRATION ☐ 462 Naturalization Application ☐ 465 Other Immigration Actions	☐ 422 Appeal 28 USC 158 ☐ 423 Withdrawal 28 USC 157 INTELLECTUAL PROPERTY RIGHTS ☐ 820 Copyrights ☐ 830 Patent ☐ 835 Patent - Abbreviated New Drug Application ☐ 840 Trademark ☐ 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY ☐ 861 HIA (1395ff) ☐ 862 Black Lung (923) ☐ 863 DIWC/DIWW (405(g)) ☐ 864 SSID Title XVI ☐ 865 RSI (405(g)) FEDERAL TAX SUITS ☐ 870 Taxes (U.S. Plaintiff or Defendant) ☐ 871 IRS—Third Party 26 USC 7609	☐ 375 False Claims Act ☐ 376 Qui Tam (31 USC 3729(a)) ☒ 400 State Reapportionment ☐ 410 Antitrust ☐ 430 Banks and Banking ☐ 450 Commerce ☐ 460 Deportation ☐ 470 Racketeer Influenced and Corrupt Organizations ☐ 480 Consumer Credit (15 USC 1681 or 1692) ☐ 485 Telephone Consumer Protection Act ☐ 490 Cable/Sat TV ☐ 850 Securities/Commodities/Exchange ☐ 890 Other Statutory Actions ☐ 891 Agricultural Acts ☐ 893 Environmental Matters ☐ 895 Freedom of Information Act ☐ 896 Arbitration ☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision ☐ 950 Constitutionality of State Statutes
REAL PROPERTY ☐ 210 Land Condemnation ☐ 220 Foreclosure ☐ 230 Rent Lease & Ejectment ☐ 240 Torts to Land ☐ 245 Tort Product Liability ☐ 290 All Other Real Property	CIVIL RIGHTS ☐ 440 Other Civil Rights ☐ 441 Voting ☐ 442 Employment ☐ 443 Housing/Accommodations ☐ 445 Amer. w/Disabilities - Employment ☐ 446 Amer. w/Disabilities - Other ☐ 448 Education PRISONER PETITIONS Habeas Corpus: ☐ 463 Alien Detainee ☐ 510 Motions to Vacate Sentence ☐ 530 General ☐ 535 Death Penalty Other: ☐ 540 Mandamus & Other ☐ 550 Civil Rights ☐ 555 Prison Condition ☐ 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
U.S. Constitution Article I, Sec. 4, Cl. 1

Brief description of cause:

Enjoin unconstitutional ballot initiative challenging the General Assembly's reapportionment

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

Damages to be determined

CHECK YES only if demanded in complaint:

JURY DEMAND:

☐ Yes ☒ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

October 15, 2025

SIGNATURE OF ATTORNEY OF RECORD

Louis J. Capozzi, III

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
 - (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
 - (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
- Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
- Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
- Original Proceedings. (1) Cases which originate in the United States district courts.
- Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
- Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
- Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
- Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
- Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
- Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
- PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
- Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
- Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI

Missouri General	)	
Assembly, et al.	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No.
Richard von Glahn, et	)	
al.	)	
	)	
Defendant,	)	
	)	

ORIGINAL FILING FORM

**THIS FORM MUST BE COMPLETED AND VERIFIED BY THE FILING PARTY
WHEN INITIATING A NEW CASE.**

☐ THIS SAME CAUSE, OR A SUBSTANTIALLY EQUIVALENT COMPLAINT, WAS
PREVIOUSLY FILED IN THIS COURT AS CASE NUMBER _____
AND ASSIGNED TO THE HONORABLE JUDGE _____.

☐ THIS CAUSE IS RELATED, BUT IS NOT SUBSTANTIALLY EQUIVALENT TO ANY
PREVIOUSLY FILED COMPLAINT. THE RELATED CASE NUMBER IS _____ AND
THAT CASE WAS ASSIGNED TO THE HONORABLE _____. THIS CASE MAY,
THEREFORE, BE OPENED AS AN ORIGINAL PROCEEDING.

☒ NEITHER THIS SAME CAUSE, NOR A SUBSTANTIALLY EQUIVALENT
COMPLAINT, HAS BEEN PREVIOUSLY FILED IN THIS COURT, AND THEREFORE
MAY BE OPENED AS AN ORIGINAL PROCEEDING.

The undersigned affirms that the information provided above is true and correct.

Date: 10/15/2025

Louis J. Capozzi, III
Signature of Filing Party

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Eastern District of Missouri

Missouri General Assembly, Denny Hoskins, and
State of Missouri

Plaintiff

v.

Richard von Glahn and People Not Politicians

Defendant

)
)
)
)
)
)
)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

Richard von Glahn
9 Wilshire Terrace
Webster Grove, MO 63119

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Louis J. Capozzi III
Office of the Attorney General
Old Post Office Building
815 Olive Street, Suite 200
St. Louis, MO 63101

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

☐ I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____; or

☐ I returned the summons unexecuted because _____; or

☐ Other *(specify)*: _____
_____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Eastern District of Missouri

Missouri General Assembly, Denny Hoskins, and
State of Missouri

Plaintiff

v.

Richard von Glahn and People Not Politicians

Defendant

)
)
)
)
)
)
)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

People Not Politicians
c/o Richard von Glahn
9 Wilshire Terrace
Webster Grove, MO 63119

A lawsuit has been filed against you.

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Office of the Attorney General
Old Post Office Building
815 Olive Street, Suite 200
St. Louis, MO 63101

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CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. _____

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This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

☐ I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____; or

☐ I returned the summons unexecuted because _____; or

☐ Other *(specify)*: _____
_____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc: