

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

PROMOTE THE VOTE, a Michigan ballot
question committee, JAMES MURRAY,
LAUREN LEGNER, and KELLIE KONSOR,

Plaintiffs,

v.

Case No.

RUTH JOHNSON, in her official capacity as
Michigan Secretary of State, NORMAN D.
SHINKLE, JULIE MATUZAK, JEANNETTE
BRADSHAW and COLLEEN PERO, in their
official capacities as members of the Michigan
Board Of State Canvassers, and SALLY
WILLIAMS, in her official capacity as Director of
the Department of State Bureau of Elections,

Hon.

Defendants.

**COMPLAINT FOR DECLARATORY
AND INJUNCTIVE RELIEF**

Plaintiffs Promote the Vote, James Murray, Lauren Legner, and Kellie
Konsor, by and through their undersigned attorneys, for their complaint for
declaratory and injunctive relief against Defendants Ruth Johnson, Norman D.
Shinkle, Julie Matuzak, Jeannette Bradshaw, Colleen Pero, and Sally Williams,
state as follows:

INTRODUCTION

1. In creating and approving Michigan's Constitution in 1963, Michigan citizens reserved to themselves the fundamental right to amend their Constitution by means of a citizens' initiative to place a proposed amendment on the statewide ballot for a vote of the electors. Plaintiff Promote the Vote ("PTV") has sponsored a proposed constitutional amendment to strengthen and secure the right to vote in Michigan elections, by, among other things: guaranteeing the secrecy of the ballot, securing the integrity and reliability of election results through an audit, ensuring timely distribution of ballots to military and overseas voters, giving citizens more freedom to register to vote, and providing registered citizens with access to an absentee ballot without having to give a reason. Michigan lags behind many other states that already have adopted these commonsense measures. Plaintiffs Murray, Legner, and Konsor support the PTV proposal and/or have signed PTV's petition to put the proposal on the November 6, 2018 ballot. Defendants are state election officials who function as the gatekeepers to Michigan's ballot, and by their unconstitutional application of Michigan election rules described herein, they have obstructed and delayed Plaintiffs' efforts to put the Promote the Vote proposal before Michigan voters to approve or reject. Specifically, by their application of standardless

and arbitrary signature comparison practices to reject petition signatures, without giving notice and an opportunity to be heard to voters whose signatures are not counted, and by applying disparate treatment to the proposal's proponent, Defendants have violated the equal protection and due process rights of PTV and the individual Plaintiffs, as well as the individual Plaintiffs' constitutional right to vote. As state law deadlines quickly near, and with election campaigning already in full swing, without this Court's intervention, Plaintiffs will suffer irreparable deprivation of their constitutional rights and injury to their collective cause of making the vote more secure and accessible in Michigan.

PARTIES

2. Plaintiff Promote the Vote ("PTV") is a Michigan ballot question committee, organized and registered under Michigan law for the purpose of undertaking a petition drive to place on the November 6, 2018, Michigan general election ballot a proposal for a constitutional amendment to secure elections and voting rights. PTV maintains its registered headquarters in Detroit, Michigan.
3. Plaintiff James Murray is a registered voter in Meridian Township, Michigan who is familiar with PTV and who wants to vote "yes" on the question in the November election.

4. Plaintiff Lauren Legner is a registered voter in Bay City, Michigan, who signed the petition to place the PTV proposal on the ballot and who wants the ability to vote “yes” on the question in the November election. She learned from a representative of PTV that her petition signature had been rejected by the Bureau of Elections on the ground that it was not genuine. She was shown a copy of the petition she had signed and she provided a sworn affidavit stating that she signed the PTV petition.
5. Plaintiff Kellie Konsor is a registered voter in Bay City, Michigan who signed the petition to place the PTV question on the ballot and who wants the ability to vote “yes” on the question in the November election. She learned from a representative of PTV that her petition signature had been rejected by the Bureau of Elections on the ground that it was not genuine. She was shown a copy of the petition she had signed, and she provided a sworn affidavit stating that she signed the PTV petition.
6. Defendant Ruth Johnson is the Michigan Secretary of State and the chief election officer of the state, M.C.L. § 168.21, with supervisory control over the administration of elections in the state and over the Bureau of Elections, a bureau with the Department of State. She is sued in her official capacity.
7. Defendants Norman D. Shinkle, Julie Matuzak, Jeannette Bradshaw and Colleen Pero are sued in their official capacities as members of the Michigan

Board of State Canvassers. The Board of State Canvassers is a body established under Michigan's Constitution and election law with the responsibility, in accordance with M.C.L. § 168.476, to canvass petitions seeking a constitutional amendment, which have been filed pursuant to M.C.L. § 168.471, and to certify proposed amendments to the ballot, following a determination that the petition is supported by a sufficient number of valid signatures.

8. Defendant Sally Williams is the Director of the Bureau of Elections which provides staff support to the Board of State Canvassers. She is sued in her official capacity.

JURISDICTION AND VENUE

9. This Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, and 1343(a).
10. This Court has authority to issue declaratory and injunctive relief pursuant to 28 U.S.C. §§2201 and 2202.
11. Venue in this district is proper pursuant to 28 U.S.C. § 1391(b).

FACTUAL ALLEGATIONS

12. Michigan citizens, in Article XII, § 2 of the Michigan Constitution of 1963, reserved to themselves the right to amend the constitution, and set forth the procedure for doing so.

13. Citizens proposing an amendment must submit a petition containing the text of the proposed amendment, signed by at least ten percent of the total votes cast for governor in the preceding general gubernatorial election. The petition must be filed at least 120 days prior to the election at which the proposed amendment is to be voted on. The current number of valid petition signatures required, based on the last gubernatorial election, is 315,654.
14. Const. 1963, Art. XII, § 2 further requires that the person authorized by law to receive the petition should determine the sufficiency and validity of the signatures and make an official announcement of this determination at least 60 days prior to the election at which the proposed amendment is to be voted on by the electorate.
15. The “person authorized by law” to receive and process such petitions is the Board of State Canvassers. M.C.L. § 168.474. The Board of State Canvassers has four members appointed by the Governor, two of whom are affiliated with each major political party. Const. 1963 art. XII, § 7; M.C.L. §§ 168.22, 168.22a.
16. M.C.L. § 168.476(1) provides that the Board must ascertain the genuineness of a signature by comparing it to a digital voter signature on file with the Secretary of State: “The qualified voter file shall be used to determine the validity of petition signatures by verifying the registration of signers and the

genuineness of signatures on petitions when the qualified voter file contains digitized signatures.” In the absence of a digitized QVF signature the Bureau may compare a doubtful signature to the records on file with the local clerk.

17. The Canvassers are assisted in performing their petition canvassing duties by the staff of the Michigan Bureau of Elections, under the supervision of the Director of Elections, who also serves *ex officio* as the Board’s non-voting Secretary.
18. The Board of Canvassers is empowered to hold hearings, issue subpoenas, and take sworn testimony as it deems necessary for investigating petitions. M.C.L. § 168.476(2). The Board makes a final determination regarding its petition canvass at a public meeting. At least two business days before the meeting, the Bureau of Elections is required to make public a staff report “concerning challenges to and sufficiency of a petition.” *Id* The Board must make its official declaration certifying the sufficiency of a petition at least two months before the election – no later than September 7, 2018, for petitions filed for placement on the November 6, 2018, general election ballot. Const. 1963, art. XII, § 2; M.C.L. 168.477.
19. Because the Bureau of Elections, acting for the Board of State Canvassers, cannot canvass each of the hundreds of thousands of signatures submitted in support of petitions for constitutional and legislative initiatives, the Bureau

has developed a procedure for canvassing a randomly selected sample of the signatures. This sampling procedure was recently summarized in a published Bureau Staff Report as follows:

Under the Board's established procedures, there are two different random sampling options: (1) A single-stage process whereby a relatively large sample is taken (usually 3,000 to 4,000 signatures depending on the percentage of signatures which must be valid in order for the petition to qualify); or (2) A two-stage process where a much smaller sample is drawn (approximately 500 signatures), and the result of that sample determines: a. Whether there is a sufficient level of confidence in the result to immediately recommend certification or the denial of certification, or b. If the result of the small sample indicates a "close call," a second random sample must be taken (usually 3,000 to 4,000 signatures) to provide a result with the maximum confidence level that can be obtained.

20. For each size sample, the Bureau develops a probability matrix, which is a set of "break points" used to determine whether the number of valid signatures in a sample is sufficient to establish with a ninety per cent (90%) degree of confidence that the sample outcome reliably reflects the total number of qualifying signatures filed. In each case, the number of signatures determined to be valid must meet or exceed the statistical break point established by the Bureau for each sample, in order for the Board to recommend that the Canvassers certify the proposal. If it is determined, with a sufficient level of confidence, that there is an insufficient number of valid signatures based on the first sample, the Bureau will recommend that the

Canvassers not certify. If the Bureau cannot make a recommendation either to certify or not certify with a sufficient level of confidence, the Bureau will draw a second, larger sample. The Bureau is required, under M.C.L. § 168.476(3), to issue a Staff Report, which contains a breakdown of valid and invalid signatures (along with the causes for rejection) and the statistical matrix applied to the sample.

21. While, as set forth above, the election law requires the Canvassers to verify the genuineness of petition signatures, there is no clear guidance on how that function is to be performed. The election law provides that the Secretary of State “*shall* promulgate rules [under Michigan’s Administrative Procedures Act] establishing uniform standards for . . . ballot question petition signatures”, which may include standards for “[d]etermining the genuineness of the signature of a circulator or individual signing a petition, including digitized signatures.” M.C.L. § 168.31(2)(b). The Secretary of State has not adopted administrative rules to guide the review and comparison of petition signatures or inform the proponent of a constitutional amendment and members of the public on obtaining petition signatures.
22. In the absence of administrative standards from the Secretary of State, the Bureau of Elections has issued informal guidance to assist the public in undertaking the formidable task of preparing, circulating and filing voter

signatures for placement of a proposed constitutional amendment or other measures on the ballot. (Michigan Bureau of Elections “Circulating and Canvassing Countywide Nominating and Qualifying Petition Forms” March 2015) (the “Bureau Guidelines”). [Ex. A attached hereto]

23. The Bureau Guidelines do not provide specific direction or standards for comparing petition signatures with the digitized signatures on file with the Secretary of State. The Bureau Guidelines state that “incomplete” signatures should be coded as “IN” and rejected, and provide the following examples of an incomplete signature: “Mrs. Smith, Mr. Smith, Jane John.” (Ex. A p. 5) The Guidelines also state that “illegible” signatures, printed signatures, and signatures with a first initial and last name are all an “Acceptable Signature Variation” (*Id*) On information and belief, the Bureau assigns signatures that they deem insufficiently similar to the digitized QVF signature as “IN,” even though such signatures are not “incomplete” and they may be “illegible,” which is not a stated basis for rejection.
24. Defendants have not established a procedure for providing notice to a petition signer that his or her signature has been rejected as not “genuine.” There are no procedures allowing a petition signer to contest the rejection of his or her signature on a petition. The petition format specified in the election law, M.C.L. § 168.544c, does not include notice to a petition signer

that his or her petition signature should be same as the signature on file with the Secretary of State or with a local clerk.

25. In the months before an election when the Bureau may be reviewing many filed ballot question and nominating petitions (as well as performing myriad other pre-election duties), the Bureau's regular staff may be augmented with temporary employees (upon information and belief, many of whom are college students) to assist with the canvass of petitions. On information and belief, neither the Bureau employees nor the temporary employees regularly receive adequate or detailed instruction in signature analysis and comparison.
26. Signature comparisons made by people who are untrained are known to be highly unreliable. In addition, studies have shown that signature comparisons by untrained people carry a high risk of false negatives, that is, there is a higher probability that the examiner will find that signatures do not match when in fact they are written by the same person.
27. On February 9, 2018, before circulating its petition, PTV submitted the petition to the Board of State Canvassers for approval as to form. A copy of the PTV petition (including the proposed amendment) is attached hereto as Exhibit B. The Canvassers approved the form of the petition at their meeting on February 13, 2018. In the ensuing weeks, PTV obtained, by its

count, 432,124 voter signatures – significantly more than the 315,654 needed for placement on the ballot.

28. On July 9, 2018, PTV timely submitted its petitions to the Bureau of Elections.
29. On August 8, 2018, after its initial check resulted in 421,355 facially valid signatures, the Bureau issued a notice that it had drawn a small sample of 500 signatures in accordance with its two-step review procedure. The sample was made available to the public and the Bureau set a deadline of August 22, 2018, for filing a challenge. (Exh. C)
30. In the normal course, the Bureau would have been expected to wait for the challenge deadline to elapse, consulted with the petition sponsor regarding any challenges, and accepted input from the sponsor regarding any signatures found by the Bureau to be invalid, and then issued a Staff Report containing its analysis of the sample and recommendation to the Board of Canvassers. The Staff Report would include the probability matrix applied by the Bureau and a breakdown of its analysis of the sample signatures.
31. However, on August 14, 2018, just six (6) days after its initial notice and over a week before the declared challenge deadline for the first sample, the Bureau issued a second notice stating that its “review of the 500 signatures within the first stage of the random sample is complete.” (Exh. D) The

notice stated that the first sample of 500 was found to contain an insufficient number of valid signatures to recommend either certification or denial of certification, and that as a result a second sample of approximately 3,300 was being drawn. The notice announced a challenge deadline of August 28, 2018, for the second sample. While the notice stated that the review of the first sample was “complete,” PTV had not been provided with any information about the Bureau’s analysis of the first sample and had not been provided any opportunity to respond to the Bureau’s signature validity determinations.

32. On the following day, August 15, 2018, PTV received by email “preliminary results” of the Bureau’s review of the first sample, which stated that it was “a **DRAFT** that is **SUBJECT TO CHANGE** pending further review.” (Exh. E to Complaint: August 21, 2018 filing with Sally Williams, Exh. 5, cover email message) The email provided the purportedly preliminary results regarding signatures which had been rejected and the reasons for the rejection. The email did not provide the probability matrix used to determine that the first sample was deficient. The Bureau did not respond to PTV’s subsequent requests for the first sample probability matrix, and as of the filing of this Complaint the Bureau has not disclosed it to PTV. The Bureau rebuffed PTV’s repeated requests for a meeting with the Bureau to discuss

the first sample results. PTV has inquired whether the Bureau of Elections intends to issue a Staff Report showing its analysis of the first sample, and is it PTV's understanding that it does not intend to do so until a complete Staff Report covering both samples is released.

33. The "preliminary" information provided by the Bureau showed that of the 500 signatures in the sample, 380 were valid signatures and 120 were rejected for various reasons. While the probability matrix was not provided, PTV was advised that 390 or 391 valid signatures were required to qualify the petition for certification.
34. According to the information provided by the Bureau, out of the 500 signatures in the sample, twenty-four (24) were rejected as "incomplete." Upon Plaintiffs' review of those 24 signatures, it does not appear that any of them meet the definition or examples of "incomplete" signatures delineated in the Bureau Guidelines. Instead, it appears that these 24 signatures may have been rejected based on a subjective and standardless determination by Bureau staff that the signatures did not match the voters' signatures in the QVF.
35. PTV contacted twenty-four (24) voters whose signatures had been rejected as "incomplete" in the Bureau's review of the first sample. PTV secured from thirteen (13) of these petition signers sworn, notarized affidavits that

their signatures on the petitions (copies of which were provided to them) were, in fact, their genuine signatures on the petitions. (Exh. F) PTV has not been able to reach all of the signers whose signatures were rejected as “incomplete,” but every one of the signers that PTV was able to contact confirmed that the signature on the petition was in fact theirs. (Exh. I, Sharon Dolente Affidavit)

36. Each affidavit stated that the signer was registered to vote, that the signer had reviewed his or her signature on the copy of the petition attached to the affidavit, confirmed that the signature on the petition was theirs and that they had signed the petition and that the information entered on the petition was correct, and in some cases explained any perceived difference between the voter’s petition signature and any prior signature on file (e.g., “I have carpal tunnel in my right hand and writing is difficult” or “I was in a hurry”). These affidavits established that the Bureau had incorrectly rejected those signatures as “incomplete” based on a standardless and subjective signature comparison.
37. Based solely on the affidavits, PTV established that there was, under the Bureau’s established procedure, a sufficient number of valid signatures in the first sample (393) for the Bureau to recommend that the Board of Canvassers certify the petition.

38. On August 21, 2018, PTV submitted a “Request for Certification Based on First Sample,” which the Director of Elections forwarded to the Board of Canvassers. (Exh. G: August 21, 2018 letter to Sally Williams (attachments omitted)) PTV’s filing included the sworn notarized affidavits of eight (8) voters who had signed the PTV petition and whose signatures had been rejected by the Bureau as “incomplete” in its review of the first sample, as well as PTV’s arguments as to why a number of additional signatures that were rejected should have been counted. On the following day PTV submitted five (5) additional affidavits, raising the total of signatures authenticated by affidavits to thirteen (13), together with defenses of three additional signatures. (Exh. H)
39. PTV attended a Board of Canvassers meeting on August 24, 2018, and addressed the Board under “Other Business.” PTV explained why the Canvassers should certify the proposal based on the first sample. Three of the four Canvassers were in attendance. (One of the of the two Democratic Party appointees was absent.) It appeared that the Canvassers had been given no information regarding the Bureau’s processing of the PTV petition, other than PTV’s August 21st and August 22nd submissions.
40. PTV reported to the Board that, while the Bureau staff had not provided a final Staff Report and recommendation to the Board, it was clear that the

total of the 380 signatures determined by the Bureau to be valid, along with the additional 13 signatures the genuineness of which was established by the sworn affidavits, demonstrated that the PTV petition was supported by a sufficient number of valid signatures so as to require that it be certified for the ballot.

41. PTV also presented its defenses of additional signatures rejected by the Bureau, including, among others, a number of signers rejected as not registered when in fact they were registered at the addresses entered on the petitions.
42. Defendant Director of Elections offered to review the affidavits and issue a Staff Report on the results of the first sample. A motion by the lone Democratic canvasser to accept the affidavits and certify the proposal based on the corrected results from the first sample failed for lack of support. No action was taken on the Director's offer to examine and process PTV's affidavits or issue a Staff Report on the first sample. Under the *status quo* as left by the Board of Canvassers, the Bureau will proceed with its analysis of the second, larger sample despite having conclusive evidence that the first sample decisively supported certification of the proposal.

43. PTV has been advised that the Bureau will not have complete results of its canvass of the second sample until August 31, 2018, and will not provide any interim results to PTV before that date.
44. On information and belief, the Bureau and Board of Canvassers have not treated other ballot question proponents in the same manner as described herein, particularly without providing adequate information on the petition review and the opportunity to respond and submit input regarding the Bureau's findings.
45. If the Bureau continues to use the same standardless and subjective practice in reviewing petition signatures in the second sample, it will continue to reject genuine valid signatures as it did in the canvass of the first sample. Because certification must occur before September 7, 2018, PTV will not have sufficient time to investigate, respond to, and provide corrections of, the anticipated errors in the Bureau's review of the second sample.
46. More than 400,000 Michigan citizens have signed petitions to put PTV's ballot proposal before the voters on November 6, 2018. Their First Amendment right to associate for the purpose of initiating amendments to their constitution, and their constitutional right to vote, are threatened by the standardless and subjective canvass of PTV's petition, and their right to due process in the counting of their signatures has been violated.

47. Plaintiffs PTV, James Murray, Lauren Legner, and Kellie Konsor, and millions of other Michigan citizens, will be denied the ability to vote on PTV's ballot proposal to reform Michigan's election law unless the Board of State Canvassers acts to certify the PTV proposal for the ballot based on the conclusive evidence that it is supported by a sufficient number of valid signatures.

PLAINTIFFS' CLAIMS

COUNT I – EQUAL PROTECTION

48. Michigan's Constitution confers on its citizens the right to petition for a vote by the electors to amend the Constitution. In exercising this Michigan constitutional right of citizen initiative, PTV and its supporters and petition signers are exercising their fundamental rights under the First Amendment to the U.S. Constitution of freedom of speech and association and to petition the government. The Equal Protection Clause of the Fourteenth Amendment to the U.S. Constitution and 42 U.S.C. § 1983 prohibit Defendants from burdening the exercise of those rights by application of Michigan's election law in an arbitrary, discriminatory and inconsistent manner, as has occurred here.
49. Defendants, acting under color of state law, have applied Michigan election law, including but not limited to M.C.L.A. § 168.476, in an arbitrary,

discriminatory and inconsistent manner, to deny or delay PTV's access to the general election ballot, thereby depriving Plaintiffs and many other Michigan citizens of the equal protection of the laws guaranteed by the Fourteenth Amendment to the U.S. Constitution and 42 U.S.C. § 1983.

COUNT II – PROCEDURAL DUE PROCESS

50. Section 1 of the Fourteenth Amendment to the U.S. Constitution prohibits a state from depriving “any person of . . . liberty . . . without due process of law.” Under 42 U.S.C. § 1983 any person who deprives another person of her or her constitutional right to due process of law may be held liable at law and in equity.
51. Defendants, acting under color of state law, deprived petition signers who support placement of the PTV amendment proposal on the general election ballot of due process by rejecting and not counting their signatures on PTV petitions without first according them notice that their signatures had been rejected and providing them the opportunity to respond and contest the invalidation and rejection of their petition signatures. In addition, Defendant Johnson has failed to promulgate objective and reliable rules or standards for determining whether a petition signer's signature is “genuine,” despite the directive in Michigan's election law that she do so. M.C.L. § 168.31(2).

52. The constitutional violates described above were aggravated by Defendants' refusal to accept sworn affidavits of petition signers submitted by PTV, in which the signers averred that they in fact signed the petitions and that their signatures on the petition was genuine.
53. Defendants' actions have impaired and continue to impair the constitutionally-protected rights and interests of Plaintiffs and many other Michigan citizens in registering their support for placement of the PTV proposal on the ballot. Defendants' violation of constitutional rights could be ameliorated if adequate due process is provided; and Michigan would not be substantially burdened if required to provide due process.

COUNT III – VIOLATION OF THE RIGHT TO VOTE

54. The right to vote is a fundamental right secured against impairment by states under the Fourteenth Amendment to the U.S. Constitution.
55. Defendants, acting under color of state law, have substantially impaired Plaintiffs Murray, Legner and Konsor's voting rights under the U.S. Constitution. While Michigan has an articulable interest in detecting fraudulent petition signatures, that interest is not served by the application of arbitrary and imprecise "signature matching" in Defendants' petition review and by denying Plaintiffs and other citizens notice that their petition

signatures have been rejected, and the opportunity to contest that rejection by the submission of extrinsic evidence or by other means.

RELIEF REQUESTED

WHEREFORE, Plaintiffs respectfully request that this court:

- A. Declare that Defendants have violated the Equal Protection clause and the Due Process clause of the U.S. Constitution, as well as the right to vote secured by the U.S. Constitution, by their actions complained of herein;
- B. Issue a temporary, preliminary, and permanent injunction restraining Defendants from continuing to violate Plaintiffs' rights, by specifically ordering Defendants (i) to immediately accept PTV's petition signer affidavits and certify that the PTV proposal has sufficient voter support for placement on the November 6, 2018, Michigan statewide ballot based on the first Bureau of Elections petition signature sample; and/or (ii) to immediately cease and desist from rejecting petition signatures using their standardless and subjective signature comparison practice; and (iii) to take such other or further action as necessary to certify the PTV proposal for placement on the November 6, 2018, Michigan statewide ballot.
- C. Award Plaintiffs attorneys fees in this action pursuant to 42 U.S.C § 1988;
- D. Award Plaintiffs their costs in bringing this action; and
- E. Grant such other and further relief as the Court deems just.

Respectfully submitted,

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* E.D. Mich. application for admission
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Dated: August 28, 2018

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INDEX OF EXHIBITS

- Exhibit A: Bureau of Elections Petition Guidelines
- Exhibit B: PTV Petition
- Exhibit C: August 8, 2018 Bureau of Elections Notice
- Exhibit D: August 14, 2018 Bureau of Elections Notice
- Exhibit E: August 15, 2018 Email from Melissa Malerman
- Exhibit F: Petition Signers Affidavits
- Exhibit G: August 21, 2018 Email and Letter to Sally Williams, Director of
Elections
- Exhibit H: August 22, 2018 Email and Letter to Sally Williams, Director of
Elections
- Exhibit I: Sharon Dolente Affidavit

EXHIBIT A



**CIRCULATING AND CANVASSING COUNTYWIDE
NOMINATING AND QUALIFYING PETITION FORMS**

Michigan Department of State
Bureau of Elections
March 2015

www.Michigan.gov/elections

CIRCULATING AND CANVASSING COUNTYWIDE PETITION FORMS

The following is a summary of the laws, court rulings and Attorney General Opinions which govern the validity of signatures on countywide nominating and qualifying petition forms.

GENERAL INFORMATION

- A signature is acceptable if it includes the name of the city or township where the signer is registered to vote; a mark to indicate whether the place of registration is a “city” or a “township”; the signer’s signature and name (cursive and printed); the signer’s street address or rural route number; the signer’s Zip Code; and the complete date on which the signer’s signature was affixed to the petition.
- Each signer must affix his or her signature to a petition sheet which bears -- in the heading of the sheet -- the name of the county in which the signer is registered to vote. The heading of the petition sheet shall list only one county.
- A signature is invalid if the signer is:
 1. Not registered to vote in Michigan, or
 2. Registered to vote in the state but not in the city or township listed, or
 3. Registered to vote in the city or township listed but the city or township is not within the county listed in the heading of the petition sheet.
- A petition sheet is acceptable if the circulator’s statement includes the circulator’s signature and name (cursive and printed); the date on which the circulator’s signature was affixed to the petition; the circulator’s complete residence address (street address or rural route number, city or township, state, and Zip Code); and for a circulator who is not a resident of Michigan, the circulator’s county of registration (if registered to vote) and the circulator’s mark (cross or check mark) in the nonresident box in the Certificate of Circulator.
- A petition sheet is invalid and none of the signatures affixed to the sheet shall be counted as valid if the circulator is not a resident of Michigan and fails to mark the nonresident box in the Certificate of Circulator.
- Certain variations are accepted. For further information, see “Acceptable Sheet Variations” and “Acceptable Signature Variations” below.

PETITION SHEET VALIDITY

DEFECTS IN THE HEADING WHICH RENDER AN ENTIRE SHEET INVALID

A petition sheet is invalid if it contains one or more of the following defects in the heading of the sheet:

- County where circulated not listed or more than one county of circulation listed – and it is not apparent from cities and townships listed by signers that circulation was within a single county.
- Required information concerning candidate or office sought omitted. This includes the candidate's name and address, party affiliation (if applicable), the office sought, and the district served by the office (if any). In addition, judicial candidates must follow the instructions for completing the heading that are printed on the reverse side of the nominating petition.

DEFECTS IN THE CERTIFICATE OF CIRCULATOR WHICH RENDER AN ENTIRE SHEET INVALID

A petition sheet is invalid if it contains one or more of the following defects in the circulator's certificate:

- Not signed by circulator.
- Signed by more than one circulator.
- The date indicated in the Certificate of Circulator is missing, incomplete, or earlier than the date entered by every petition signer.
- The circulator's residence address is missing, incomplete, or includes a P.O. Box in lieu of a street address or rural route. (Note, however, that the circulator's failure to include the correct Zip Code, by itself, is not a fatal defect.)
- Special note for nonresident circulators only: A petition sheet is invalid if the circulator is not a resident of Michigan and fails to mark the nonresident box in the Certificate of Circulator.

ACCEPTABLE SHEET VARIATIONS

The following variations do not render a petition sheet invalid:

- County where circulated not listed or more than one county of circulation listed – and it is apparent from cities and townships listed by signers that circulation was within a single county.

- For all offices except judicial offices, the failure to include the “Term Expiration Date” does not render a petition sheet invalid if it can be ascertained which position the candidate is seeking. For example, if a candidate is seeking nomination or election to the office of County Clerk, the candidate is not required to include the “Term Expiration Date” because there is only one position to be elected. If there are multiple positions available with different term ending dates, the candidate should include the “Term Expiration Date.” (Judicial candidates must follow the instructions printed on the reverse side of the nominating petition with respect to the “Term Expiration Date.”)
- Illegible circulator signature.
- Any of the following: circulator prints name in entry provided for signature; circulator fails to print name in entry provided for printed name; circulator enters his or her cursive signature in entry provided for printed name. (Note: a circulator’s signature is invalid if circulator prints name in entry provided for printed name and fails to enter his or her signature in the signature entry.)
- Circulator fails to enter his or her Zip Code or enters an incorrect Zip Code.
- Circulator lists village or “unincorporated place” instead of the township in which he or she resides, as long as the village or “unincorporated place” is wholly contained within a single township.

PETITION SIGNATURE VALIDITY

A signature is invalid if it contains one or more of the defects or omissions listed below. The codes used to mark defects and omissions on petition sheets are shown to the left of the descriptions.

CODE	EXPLANATION
<i>JURISDICTION ERRORS</i>	
NC	No city or township by that name is located within the county listed in the heading of the petition.
IC	Village or “unincorporated place” is listed instead of the township where the signer resides, but only if the village or “unincorporated place” is located within two or more townships. <i>Note: for an explanation of the phrase, “unincorporated place,” please refer to the section below entitled, “Attention to Detail Advised,” and “Unincorporated Places.”</i>
DUAL	Dual jurisdiction entry; two or more jurisdictions are given.
<i>ADDRESS ERRORS</i>	
OC	The address given is located outside of the city or township listed.
NA	No street address or rural route number is given.
<i>DATE ERRORS</i>	
ND	Signature is undated or an incomplete date is given.

CODE	EXPLANATION
ED	Signature is dated before the first date the petition is authorized by law to be circulated.
SDC	Signature is dated after the circulator dated his or her signature.
<i>SIGNATURE ERRORS</i>	
CO	Signature is crossed out prior to filing.
IN	Incomplete signature. For example, signature appears as follows: "Mrs. Smith," "Mr., Smith," "Jane," "John."
NR	Signer is not registered to vote within the electoral district.
DUP	Signer signed petition twice (or more times), or signed nominating petitions for more candidates than there are persons to be elected to the office.
<i>MISCELLANEOUS ERRORS</i>	
MC	Miscellaneous identification problem.

ACCEPTABLE SIGNATURE VARIATIONS

The following variations are acceptable and do not render a petition signature invalid:

- Signature appears as follows: J. Smith; J.B. Smith; Mrs. J. Brown; Mrs. J.B. Brown; Mrs. John Brown.
- Illegible signature.
- Any of the following: signer prints name in entry provided for signature; signer fails to print name in entry provided for printed name; signer enters his or her cursive signature in entry provided for printed name. (Note: a signature is invalid if signer prints name in entry provided for printed name -- and fails to enter his or her signature in the signature entry.)
- Signer fails to enter his or her Zip Code or enters an incorrect Zip Code.
- Ditto marks.
- Signer enters the community name appearing in his or her mailing address for his or her city or township of registration. (For example, a signature is acceptable if (1) the signer enters "East Lansing" on the petition, and (2) the signer is, in fact, registered to vote in Meridian Township, and (3) the signer has an "East Lansing" mailing address.) The validity of a signature accompanied by a community name which appears in the signer's mailing address is not affected by a city/township check off box error. This remains true if the community name appearing in the signer's mailing address is shared by both a city and a township in the county.
- Signer lists village or "unincorporated place" instead of township of registration when village or "unincorporated place" is contained within a single township.

- With respect to the signer’s selection of the “City” or “Township” box preceding the signature, the following principles apply:
 - A signature is valid even if the signer fails to indicate whether the jurisdiction of registration is a “city” or a “township.” (Note: the signature is valid regardless of whether (1) there is only one city or township by that name in the county listed in the heading, or (2) there is both a city and a township by that name in the county listed in the heading.)
 - A signature is valid even if the signer marks both the “city” box and the “township” box. (Note: the signature is valid regardless of whether (1) there is only one city or township by that name in the county listed in the heading, or (2) there is both a city and a township by that name in the county listed in the heading.)
 - There is only one circumstance in which a signer’s selection of the “city” or “township” box will render the signature invalid – if the signer selects the incorrect box. (For example, if the signer marks the box indicating that he or she is registered to vote in the City of Lansing but in fact is registered in Lansing Township, the signature is invalid.)

ATTENTION TO DETAIL ADVISED

Michigan contains 83 counties, 279 cities, 1,240 townships and 254 villages. Contained within Michigan’s townships are numerous “unincorporated places” which bear separate, unique names. Additionally, all of the state is served by post offices with names that in many cases do not correspond to the names of the cities, townships and villages they serve. Circulators using the “countywide” petition form are advised of the following:

CITIES AND TOWNSHIPS: All registered voters in Michigan are registered in a single city or township within the state. Because many cities and townships share the same name, it is important that the place of registration listed by each signer on the petition be clearly identified as a “city” or a “township.” For example, in Shiawassee County there is a City of Owosso and a Township of Owosso.

Remember, if a registered voter signs a petition sheet that lists in its heading the wrong county of registration, the signature is invalid. For example, if a voter registered in the City of Owosso signs a sheet which lists any county other than Shiawassee County in its heading, the signature is invalid.

A number of cities in the state overlap county boundary lines. (No townships overlap county boundaries.) When obtaining a signature from a voter who is registered in a city that crosses county boundaries, make sure that the voter signs a sheet which properly lists in its heading the signer’s county of registration.

VILLAGES: Villages are Michigan's smallest units of government. Some villages are wholly contained within a single township; others cross township boundaries. (Villages are not contained within nor do they cross into cities.)

A village resident who signs a "countywide" petition must list his or her township of registration. Further, the signer must be registered to vote in the township listed. A signature affixed to the petition by a village resident will be found invalid if the person is not registered to vote in the appropriate township.

If an error is made and the signer lists the name of a village instead of his or her township of registration, the signature will be accepted only if the village is wholly contained within a single township. As noted above, the signer must be registered to vote in the appropriate township. A signature will be found invalid if the signer lists the name of a village instead of his or her township of registration and that village is located within multiple townships.

A number of villages in the state also overlap county boundary lines. When obtaining a signature from a voter who is registered in a village that crosses county boundaries, make sure that the voter signs a sheet which properly lists in its heading the signer's county of registration.

UNINCORPORATED PLACES: Michigan contains a number of unincorporated places that, unlike cities, townships, and villages, do not qualify as separate units of government. Some unincorporated places are wholly contained within a single township; others cross township boundaries. (Unincorporated places generally are not contained within nor do they cross into cities.) Michigan residents who live in unincorporated places register to vote with their township clerk.

A resident of an unincorporated place who wishes to sign a "countywide" petition form must list his or her township of registration. Further, the signer must be registered to vote in the township listed. If an error is made and a signer lists the name of an unincorporated place instead of his or her township of registration, the signature will be accepted only if the unincorporated place is wholly contained within a single township. A signature will be found invalid if the signer lists the name of an unincorporated place instead of his or her township of registration and that unincorporated place is located within multiple townships.

POST OFFICES AND ZIP CODES: All post offices are referred to by name and serve delivery areas of varying sizes. Each delivery area is assigned a Zip Code. In some cases, the name of a person's post office will correspond to the name of the person's city or township of residence. In other cases, especially in sparsely populated areas, the name of the person's post office will not correspond to the name of the person's city or township of residence. Thus, a person's mailing address may or may not correspond to the name of the city or township where the person is registered to vote. For example, Mason residents are registered to vote in the City of Mason and have Mason mailing address. However, persons registered to vote in Genesee Township, Richfield Township and Vienna Township in Genesee County have a Mt. Morris mailing address.

The signature of a signer who lists the name of his or her post office for his or her city or township of registration is acceptable. For example, if a voter registered in Genesee Township, Genesee County lists Mt. Morris (the name of the voter's post office) for his or her township of registration, the signature will not be rejected for the error.

IMPORTANT

The information in this brochure is offered as a summary of the provisions which govern the validity of petition signatures; it is not a complete interpretation of the governing laws. Questions may be addressed to:

Michigan Department of State
Bureau of Elections
P.O. Box 20126
Lansing, Michigan 48901-0726
Telephone: (517) 373-2540 or (800) 292-5973
Fax: (517) 373-0941

Email: elections@michigan.gov
Web: www.michigan.gov/elections



EXHIBIT B

INITIATIVE PETITION AMENDMENT TO THE CONSTITUTION

A proposal to amend the Michigan Constitution of 1963 by amending Article II, Section 4. If adopted the proposal would provide citizens qualified to vote in Michigan with the following rights: to vote a secret ballot; for military and overseas voters to be sent a ballot 45 days before an election; to vote straight party on all partisan general election ballots; to be automatically registered to vote when obtaining a driver's license or personal identification card from the Secretary of State, unless the person declines; to register to vote by mail on or before the 15th day before an election; to register to vote in person at any time with proof of residency; to vote an absentee ballot, by mail or in person, without giving a reason; and to have election results audited to ensure the accuracy of elections. This proposal is to be voted on at the November 6, 2018 general election.

The full text of the proposal appears on the reverse side of this petition along with the provisions of the existing constitution which would be altered or abrogated if the proposal is adopted. We, the undersigned qualified and registered electors, residents in the county of _____, State of Michigan, respectively petition for amendment to constitution.

WARNING — A person who knowingly signs this petition more than once, signs a name other than his or her own, signs when not a qualified and registered elector, or sets opposite his or her signature on a petition, a date other than the actual date the signature was affixed, is violating the provisions of the Michigan election law.

INDICATE CITY OR TOWNSHIP IN WHICH REGISTERED TO VOTE	SIGNATURE	PRINTED NAME	STREET ADDRESS OR RURAL ROUTE	ZIP CODE	DATE OF SIGNING MO DAY YEAR
1. CITY OF <input type="checkbox"/> TOWNSHIP OF <input type="checkbox"/>					
2. CITY OF <input type="checkbox"/> TOWNSHIP OF <input type="checkbox"/>					
3. CITY OF <input type="checkbox"/> TOWNSHIP OF <input type="checkbox"/>					
4. CITY OF <input type="checkbox"/> TOWNSHIP OF <input type="checkbox"/>					
5. CITY OF <input type="checkbox"/> TOWNSHIP OF <input type="checkbox"/>					
6. CITY OF <input type="checkbox"/> TOWNSHIP OF <input type="checkbox"/>					
7. CITY OF <input type="checkbox"/> TOWNSHIP OF <input type="checkbox"/>					
8. CITY OF <input type="checkbox"/> TOWNSHIP OF <input type="checkbox"/>					
9. CITY OF <input type="checkbox"/> TOWNSHIP OF <input type="checkbox"/>					
10. CITY OF <input type="checkbox"/> TOWNSHIP OF <input type="checkbox"/>					

PENDING

CERTIFICATE OF CIRCULATOR

The undersigned circulator of the above petition asserts that he or she is 18 years of age or older and a United States citizen; that each signature on the petition was signed in his or her presence; that he or she has neither caused nor permitted a person to sign the petition more than once and has no knowledge of a person signing the petition more than once; and that, to his or her best knowledge and belief, each signature is the genuine signature of the person purporting to sign the petition, the person signing the petition was at the time of signing a registered elector of the city or township indicated preceding the signature, and the elector was qualified to sign the petition.

If the circulator is not a resident of Michigan, the circulator shall make a cross or check mark in the box provided, otherwise each signature on this petition sheet is invalid and the signatures will not be counted by a filing official. By making a cross or check mark in the box provided, the undersigned circulator asserts that he or she is not a resident of Michigan and agrees to accept the jurisdiction of this state for the purpose of any legal proceeding or hearing that concerns a petition sheet executed by the circulator and agrees that legal process served on the Secretary of State or a designated agent of the Secretary of State has the same effect as if personally served on the circulator.

WARNING — A circulator knowingly making a false statement in the above certificate, a person not a circulator who signs as a circulator, or a person who signs a name other than his or her own as circulator is guilty of a misdemeanor.

Paid for with regulated funds by Promote the Vote, 2966 Woodward Ave., Detroit, MI 48201.



CIRCULATOR — Do not sign or date certificate until after circulating petition.

(Signature of Circulator)

(Printed Name of Circulator)

Complete Residence Address (Street and Number or Rural Route) [Do Not Enter a Post Office Box]

(City or Township, State, Zip Code)

(County of Registration, If Registered to Vote, of a Circulator who is not a Resident of Michigan)

(Date)

AMENDMENT TO THE CONSTITUTION

The proposal would amend Article II, Section 4 of the Michigan Constitution of 1963 as follows (language added in capital letters; language deleted struck out with a line):

§4 Place and manner of elections.

Sec. 4. (1) EVERY CITIZEN OF THE UNITED STATES WHO IS AN ELECTOR QUALIFIED TO VOTE IN MICHIGAN SHALL HAVE THE FOLLOWING RIGHTS:

- (A) THE RIGHT, ONCE REGISTERED, TO VOTE A SECRET BALLOT IN ALL ELECTIONS.
- (B) THE RIGHT, IF SERVING IN THE MILITARY OR LIVING OVERSEAS, TO HAVE AN ABSENT VOTER BALLOT SENT TO THEM AT LEAST FORTY-FIVE (45) DAYS BEFORE AN ELECTION UPON APPLICATION.
- (C) THE RIGHT, ONCE REGISTERED, TO A "STRAIGHT PARTY" VOTE OPTION ON PARTISAN GENERAL ELECTION BALLOTS. IN PARTISAN ELECTIONS, THE BALLOT SHALL INCLUDE A POSITION AT THE TOP OF THE BALLOT BY WHICH THE VOTER MAY, BY A SINGLE SELECTION, RECORD A STRAIGHT PARTY TICKET VOTE FOR ALL THE CANDIDATES OF ONE (1) PARTY. THE VOTER MAY VOTE A SPLIT OR MIXED TICKET.
- (D) THE RIGHT TO BE AUTOMATICALLY REGISTERED TO VOTE AS A RESULT OF CONDUCTING BUSINESS WITH THE SECRETARY OF STATE REGARDING A DRIVER'S LICENSE OR PERSONAL IDENTIFICATION CARD, UNLESS THE PERSON DECLINES SUCH REGISTRATION.
- (E) THE RIGHT TO REGISTER TO VOTE FOR AN ELECTION BY MAILING A COMPLETED VOTER REGISTRATION APPLICATION ON OR BEFORE THE FIFTEENTH (15TH) DAY BEFORE THAT ELECTION TO AN ELECTION OFFICIAL AUTHORIZED TO RECEIVE VOTER REGISTRATION APPLICATIONS.
- (F) THE RIGHT TO REGISTER TO VOTE FOR AN ELECTION BY (1) APPEARING IN PERSON AND SUBMITTING A COMPLETED VOTER REGISTRATION APPLICATION ON OR BEFORE THE FIFTEENTH (15TH) DAY BEFORE THAT ELECTION TO AN ELECTION OFFICIAL AUTHORIZED TO RECEIVE VOTER REGISTRATION APPLICATIONS, OR (2) BEGINNING ON THE FOURTEENTH (14TH) DAY BEFORE THAT ELECTION AND CONTINUING THROUGH THE END OF THE ELECTION, APPEARING IN PERSON, SUBMITTING A COMPLETED VOTER REGISTRATION APPLICATION AND PROVIDING PROOF OF RESIDENCY TO AN ELECTION OFFICIAL RESPONSIBLE FOR MAINTAINING CUSTODY OF THE REGISTRATION FILE WHERE THE PERSON RESIDES, OR THEIR DEPUTIES. PERSONS REGISTERED IN ACCORDANCE WITH SUBSECTION (1)(F) SHALL BE IMMEDIATELY ELIGIBLE TO RECEIVE A REGULAR OR ABSENT VOTER BALLOT.
- (G) THE RIGHT, ONCE REGISTERED, TO VOTE AN ABSENT VOTER BALLOT WITHOUT GIVING A REASON, DURING THE FORTY (40) DAYS BEFORE AN ELECTION, AND THE RIGHT TO CHOOSE WHETHER THE ABSENT VOTER BALLOT IS APPLIED FOR, RECEIVED AND SUBMITTED IN PERSON OR BY MAIL. DURING THAT TIME, ELECTION OFFICIALS AUTHORIZED TO ISSUE ABSENT VOTER BALLOTS SHALL BE AVAILABLE IN AT LEAST ONE (1) LOCATION TO ISSUE AND RECEIVE

ABSENT VOTER BALLOTS DURING THE ELECTION OFFICIALS' REGULARLY SCHEDULED BUSINESS HOURS AND FOR AT LEAST EIGHT (8) HOURS DURING THE SATURDAY AND/OR SUNDAY IMMEDIATELY PRIOR TO THE ELECTION. THOSE ELECTION OFFICIALS SHALL HAVE THE AUTHORITY TO MAKE ABSENT VOTER BALLOTS AVAILABLE FOR VOTING IN PERSON AT ADDITIONAL TIMES AND PLACES BEYOND WHAT IS REQUIRED HEREIN.

- (H) THE RIGHT TO HAVE THE RESULTS OF STATEWIDE ELECTIONS AUDITED, IN SUCH MANNER AS PRESCRIBED BY LAW, TO ENSURE THE ACCURACY AND INTEGRITY OF ELECTIONS.

ALL RIGHTS SET FORTH IN THIS SUBSECTION SHALL BE SELF-EXECUTING. THIS SUBSECTION SHALL BE LIBERALLY CONSTRUED IN FAVOR OF VOTERS' RIGHTS IN ORDER TO EFFECTUATE ITS PURPOSES. NOTHING CONTAINED IN THIS SUBSECTION SHALL PREVENT THE LEGISLATURE FROM EXPANDING VOTERS' RIGHTS BEYOND WHAT IS PROVIDED HEREIN. THIS SUBSECTION AND ANY PORTION HEREOF SHALL BE SEVERABLE. IF ANY PORTION OF THIS SUBSECTION IS HELD INVALID OR UNENFORCEABLE AS TO ANY PERSON OR CIRCUMSTANCE, THAT INVALIDITY OR UNENFORCEABILITY SHALL NOT AFFECT THE VALIDITY, ENFORCEABILITY, OR APPLICATION OF ANY OTHER PORTION OF THIS SUBSECTION.

(2) EXCEPT AS OTHERWISE PROVIDED IN THIS CONSTITUTION OR IN THE CONSTITUTION OR LAWS OF THE UNITED STATES the legislature shall enact laws to regulate the time, place and manner of all nominations and elections, except as otherwise provided in this constitution or in the constitution and laws of the United States. The legislature shall enact laws to preserve the purity of elections, to preserve the secrecy of the ballot, to guard against abuses of the elective franchise, and to provide for a system of voter registration and absentee voting. No law shall be enacted which permits a candidate in any partisan primary or partisan election to have a ballot designation except when required for identification of candidates for the same office who have the same or similar surnames.

Provisions of existing constitution altered or abrogated by the proposal if adopted:

ARTICLE II
ELECTIONS

§4 Place and manner of elections.

Sec. 4. The legislature shall enact laws to regulate the time, place and manner of all nominations and elections, except as otherwise provided in this constitution or in the constitution and laws of the United States. The legislature shall enact laws to preserve the purity of elections, to preserve the secrecy of the ballot, to guard against abuses of the elective franchise, and to provide for a system of voter registration and absentee voting. No law shall be enacted which permits a candidate in any partisan primary or partisan election to have a ballot designation except when required for identification of candidates for the same office who have the same or similar surnames.

EXHIBIT C



STATE OF MICHIGAN
RUTH JOHNSON, SECRETARY OF STATE
DEPARTMENT OF STATE
LANSING

August 8, 2018

**CHALLENGE DEADLINE ESTABLISHED FOR
INITIATIVE PETITION TO AMEND THE MICHIGAN CONSTITUTION
SPONSORED BY PROMOTE THE VOTE**

An initiative petition proposing an amendment to the Michigan Constitution to provide for automatic voter registration, straight party voting, no-reason absentee voting, and other changes in voting procedures was filed with the Secretary of State on July 9, 2018 by Promote the Vote.

The Board of State Canvassers has established a uniform deadline for challenging signatures sampled from an initiative, constitutional amendment or referendum petition to elapse at 5:00 p.m. on the 10th business day after copies of the sampled signatures are made available to the public. (See minutes of November 8, 2013 meeting of the Board of State Canvassers.)

Please be advised that copies of the signatures sampled from this constitutional amendment petition were made available for release to the public on August 8, 2018. **Therefore, the deadline to submit challenges to this petition will elapse at 5:00 p.m. on August 22, 2018.**

Please contact the Bureau of Elections at (517) 373-2540 or elections@michigan.gov if you wish to purchase a copy of the sampled signatures for the petition.

EXHIBIT D



STATE OF MICHIGAN
RUTH JOHNSON, SECRETARY OF STATE
DEPARTMENT OF STATE
LANSING

August 14, 2018

**SECOND CHALLENGE DEADLINE ESTABLISHED FOR
INITIATIVE PETITION TO AMEND THE MICHIGAN CONSTITUTION
SPONSORED BY PROMOTE THE VOTE**

An initiative petition to amend the Michigan Constitution concerning voting procedures was filed with the Secretary of State on July 9, 2018 by Promote the Vote. Copies of the signatures randomly selected for inclusion in the original, first stage sample of 500 signatures were made available for release to the public on August 8, 2018.

The staff's review of the 500 signatures within the first stage of the random sample is complete. Based on this examination, the first sample was found to contain an insufficient number of valid signatures to immediately recommend that the Board of State Canvassers either certify or deny certification of the petition. Under the Board's random sampling procedures, the result of the first random sample requires that a larger, second sample of approximately 3,300 signatures be drawn to determine whether or not the petition qualifies for certification.

Please be advised that copies of the second random sample are now available to the public for purchase. The deadline for challenging signatures included in the second sample will elapse at 5:00 p.m. on the 10th business day after its release. **Therefore, the deadline to submit challenges to signatures contained within the second random sample will elapse at 5:00 p.m. on August 28, 2018.**

Please contact the Bureau of Elections at (517) 373-2540 or elections@michigan.gov if you wish to purchase a copy of the second random sample.

EXHIBIT E

Andrew Nickelhoff

From: Malerman, Melissa (MDOS) <malermanm@michigan.gov>
Sent: Wednesday, August 15, 2018 7:37 PM
To: Andrew Nickelhoff; Sharon Dolente; 'listdp@comcast.net'
Cc: Williams, Sally (MDOS); Pierce, Carol (MDOS)
Subject: PTV
Attachments: Promote the Vote 500 Sample PRELIMINARY Result.xlsx

Importance: High

The spreadsheet for our preliminary review of the first 500 sampled signatures is attached – please be advised that this is a **DRAFT** that is **SUBJECT TO CHANGE** pending further review by our office and/or any challenge or response/rebuttal that is filed.

The “universe” included 91,175 sheets bearing 421,355 signatures. We are **not** through counting the actual numbers of rejected sheets and signatures affixed thereto, but according to the filing receipt, PTV claimed on July 9 that it was filing 95,666 sheets bearing 432,124 signatures.

Also, sheet 1145 in the second sample appears to have line 2 marked, but this signature was crossed out prior to filing. The actual line number in the second sample is line 3 – apologies for the “floating circle” that was placed too high and made it look like we sampled a crossed out signature, hopefully it did not confuse you. The sampled signature is actually Sheet 1145, Line 3.

EXHIBIT F

STATE OF MICHIGAN
BOARD OF STATE CANVASSERS

In re Petition of Promote the Vote

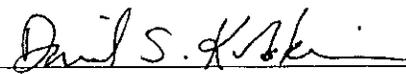
AFFIDAVIT OF DAVID BOEVING

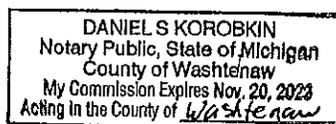
David Boeving, being duly sworn, states as follows:

1. My name is David Boeving. I am an adult resident of the State of Michigan and I am registered to vote in Michigan.
2. On June 6, 2018, I signed a petition to amend the Michigan Constitution. The proposal, if adopted, would provide citizens qualified to vote in Michigan with various rights related to voting and elections.
3. I have reviewed the attached petition, stamped 041989, and I hereby confirm that all my information is correct and that is my signature.
4. If there is any perceived discrepancy between my signature on the petition and a signature I've given previously it may be because I was standing on the street and writing on a clipboard when I signed the petition.
5. I have personal knowledge of these facts and, if called as a witness, can testify to them.


David Boeving

Subscribed and sworn to before me on August 19, 2018.


Notary Public, State of Michigan



INITIATIVE PETITION AMENDMENT TO THE CONSTITUTION

A proposal to amend the Michigan Constitution of 1963 by amending Article II, Section 4. If adopted the proposal would provide citizens qualified to vote in Michigan with the following rights: to vote a secret ballot; for military and overseas voters to be sent a ballot 45 days before an election; to vote straight party on all partisan general election ballots; to be automatically registered to vote when obtaining a driver's license or personal identification card from the Secretary of State, unless the person declines; to register to vote by mail on or before the 15th day before an election; to register to vote in person at any time with proof of residency; to vote an absentee ballot, by mail or in person, without giving a reason; and to have election results audited to ensure the accuracy of elections. This proposal is to be voted on at the November 6, 2018 general election.

The full text of the proposal appears on the reverse side of this petition along with the provisions of the existing constitution which would be altered or abrogated if the proposal is adopted. We, the undersigned qualified and registered electors, residents in the county of Washtenaw State of Michigan, respectively petition for amendment to constitution.

041989

WARNING — A person who knowingly signs this petition more than once, signs a name other than his or her own, signs when not a qualified and registered elector, or sets opposite his or her signature on a petition, a date other than the actual date the signature was affixed, is violating the provisions of the Michigan election law.

INDICATE CITY OR TOWNSHIP IN WHICH REGISTERED TO VOTE	SIGNATURE	PRINTED NAME	STREET ADDRESS OR RURAL ROUTE	ZIP CODE	DATE OF SIGNING
CITY OF <input type="checkbox"/> TOWNSHIP OF <input type="checkbox"/>					MO DAY YEAR
1. CITY OF <input type="checkbox"/> Ypsilanti	<i>David Boering</i>	David Boering	128 W. Michigan Ave Apt 5	48197	6 6 18
2. CITY OF <input type="checkbox"/> Ypsilanti	<i>Austin Jackson</i>	Austin Jackson	205 W. Washington Ave	48197	6 6 18
3. CITY OF <input type="checkbox"/> TOWNSHIP OF <input type="checkbox"/>					
4. CITY OF <input type="checkbox"/> TOWNSHIP OF <input type="checkbox"/>					
5. CITY OF <input type="checkbox"/> TOWNSHIP OF <input type="checkbox"/>					
6. CITY OF <input type="checkbox"/> TOWNSHIP OF <input type="checkbox"/>					
7. CITY OF <input type="checkbox"/> TOWNSHIP OF <input type="checkbox"/>					
8. CITY OF <input type="checkbox"/> TOWNSHIP OF <input type="checkbox"/>					
9. CITY OF <input type="checkbox"/> TOWNSHIP OF <input type="checkbox"/>					
10. CITY OF <input type="checkbox"/> TOWNSHIP OF <input type="checkbox"/>					

CERTIFICATE OF CIRCULATOR

The undersigned circulator of the above petition asserts that he or she is 18 years of age or older and a United States citizen; that each signature on the petition was signed in his or her presence, that he or she has neither caused nor permitted a person to sign the petition more than once and has no knowledge of a person signing the petition more than once; and that, to his or her best knowledge and belief, each signature is the genuine signature of the person purporting to sign the petition, the person signing the petition was at the time of signing a registered elector of the city or township indicated preceding the signature, and the elector was qualified to sign the petition.

If the circulator is not a resident of Michigan, the circulator shall make a cross or check mark in the box provided, otherwise each signature on this petition sheet is invalid and the signatures will not be counted by a filing official. By making a cross or check mark in the box provided, the undersigned circulator asserts that he or she is not a resident of Michigan and agrees to accept the jurisdiction of this state for the purpose of any legal proceeding or hearing that concerns a petition sheet executed by this circulator and agrees that legal process served on the Secretary of State or a designated agent of the Secretary of State has the same effect as if personally served on the circulator.

WARNING — A circulator knowingly making a false statement in the above certificate, a person not a circulator who signs as a circulator, or a person who signs a name other than his or her own as circulator is guilty of a misdemeanor.

Paid for with regulated funds by Promote the Vote, 2986 Woodward Ave., Detroit, MI 48201.

CIRCULATOR — Do not sign or date certificate until after circulating petition.
(Signature of Circulator) *Thomas Townsend* (Date) 6 6 18

(Printed Name of Circulator)

Complete Residence Address (Street and Number or Rural Route) [Do Not Enter a Post Office Box]

(City or Township, State, Zip Code)

(County of Registration, If Registered to Vote, of a Circulator who is not a Resident of Michigan)

STATE OF MICHIGAN
BOARD OF STATE CANVASSERS

In re Petition of Promote the Vote

AFFIDAVIT OF DANIELLE KAY

Danielle Kay, being duly sworn, states as follows:

1. My name is Danielle Kay. I am an adult resident of the State of Michigan and I am registered to vote in Michigan.

2. On April 15, 2018, I signed a petition to amend the Michigan Constitution. The proposal, if adopted, would provide citizens qualified to vote in Michigan with various rights related to voting and elections.

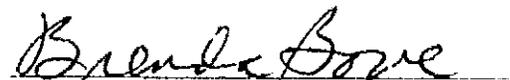
3. I have reviewed the attached petition, stamped 067968, and I hereby confirm that all my information is correct and that is my signature.

4. If there is any perceived discrepancy between my signature on the petition and a signature I've given previously it may be because my signature is very simple.

5. I have personal knowledge of these facts and, if called as a witness, can testify to them.


Danielle Kay

Subscribed and sworn to before me on Aug. 21, 2018.


Notary Public, State of Michigan

BRENDA BOVE
NOTARY PUBLIC, STATE OF MI
COUNTY OF OAKLAND
MY COMMISSION EXPIRES Nov 3, 2020
ACTING IN COUNTY OF Oakland

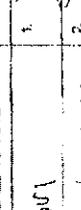
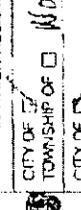
**INITIATIVE PETITION
AMENDMENT TO THE CONSTITUTION**

A proposal to amend the Michigan Constitution of 1963 by amending Article II, Section 4. If adopted the proposal would provide citizens qualified to vote in Michigan with the following rights: to vote a secret ballot; to request and receive voters to be sent a notice 45 days before an election; to vote straight party on all partisan general election ballots; to be automatically registered to vote when obtaining a driver's license or personal identification card from the Secretary of State, unless the person declines, to register to vote by mail on or before the 15th day before an election; to register to vote in person at any time with proof of residency; to vote in person, without giving a reason, and to have election results weighted to give the accuracy of electors. This proposal is to be voted on at the November 5, 2018 general election.

The full text of the proposal appears on the reverse side of this petition along with the provisions of the existing constitution which would be altered or abrogated if the proposal is adopted.

We, the undersigned qualified and registered electors, residents in the county of Oakland, State of Michigan, respectfully petition for amendment to the constitution.

WARNING — A person who knowingly signs this petition more than once, signs a name other than his or her own, signs when not a qualified and registered elector, or sets opposite his or her signature on a petition, a date other than the actual date the signature was affixed, is violating the provisions of the Michigan election law.

INDICATE CITY OR TOWNSHIP IN WHICH REGISTERED TO VOTE	SIGNATURE	PRINTED NAME	STREET ADDRESS OR RENTAL RATE	ZIP CODE	NO.	DATE OF SIGNING DAY MONTH YEAR
CITY OF <input checked="" type="checkbox"/> <u>Wolverine</u> TOWNSHIP OF <input type="checkbox"/>		Danielle Kay	45605 South Lake Dr.	48377	4	4 15 18
CITY OF <input type="checkbox"/> TOWNSHIP OF <input type="checkbox"/>		Emily Kasper	671 Stinson Dr.	48326	5	4 13 18
CITY OF <input type="checkbox"/> TOWNSHIP OF <input type="checkbox"/>		Jack Beckwith	1517 W. Flamingo	48067	4	4 15 18
CITY OF <input type="checkbox"/> TOWNSHIP OF <input type="checkbox"/>		Rob Szymanski	2812 East 1st	48067	4	4 15 18
CITY OF <input type="checkbox"/> TOWNSHIP OF <input type="checkbox"/>		Justin Somerville	6594 Cloverton Drive	48321	4	4 15 18
CITY OF <input type="checkbox"/> TOWNSHIP OF <input type="checkbox"/>		LAURA KASPER	5749 Eagle Ln.	48326	4	4 15 18
CITY OF <input type="checkbox"/> TOWNSHIP OF <input type="checkbox"/>		NANCY SISKAWIT	6600 Snowflake Drive	48313	4	4 15 18
CITY OF <input type="checkbox"/> TOWNSHIP OF <input type="checkbox"/>		Janet Subasing	60628 Snow Apple Drive	48346	4	4 15 18
CITY OF <input type="checkbox"/> TOWNSHIP OF <input type="checkbox"/>		Mair Greene	3165 Davison Lk	48462	4	4 15 18
CITY OF <input type="checkbox"/> TOWNSHIP OF <input type="checkbox"/>		Amber Kier	716 E Maple	48412	4	4 15 18

CIRCULATOR — Do not sign or date certificate until after circulating petition.
Maria G. Simon 041518
 (Signature of Circulator) (Date)

Maria G. Simon
 (Printed Name of Circulator)
323 MARION RD
 Complete Residence Address (Street and Number or Rural Route) (Do Not Enter a Post Office Box)
Garosse Pointe Farms MI 48236
 (City or Township, State, Zip Code)

CERTIFICATE OF CIRCULATOR
 The undersigned circulator of the above petition asserts that he or she is 18 years of age and a United States citizen, that each signature on the petition was signed in his or her presence, that he or she has no other caused or permitted a person to sign the petition more than once, and has no knowledge of a person purporting to sign the petition, the person signing the petition was at the time of signing a registered elector of the city or township indicated preceding the signature, and the elector was qualified to sign the petition.

If the circulator is not a resident of Michigan, the circulator shall make a cross or check mark in the box provided, otherwise each signature on this petition shall be invalid and the signatures will not be counted by a filing official. By making a cross or check mark in the box provided, the undersigned circulator asserts that he or she is not a resident of Michigan and agrees to accept the jurisdiction of this state for the purpose of any legal proceeding or hearing that concerns a petition circulated by this circulator and agrees that legal process served on the Secretary of State or a designated agent of the Secretary of State has the same effect as if personally served on the circulator.

WARNING — A circulator knowingly making a false statement in the above certificate, a person not a circulator who signs as a circulator, or a person who signs a name other than his or her own as circulator is guilty of a misdemeanor.

Printed for sale by permission of the Michigan Secretary of State, Lansing, Michigan. Form No. 11-2001.

STATE OF MICHIGAN
BOARD OF STATE CANVASSERS

In re Petition of Promote the Vote

AFFIDAVIT OF BECHARA KOBROSSI

Bechara Kobrossi, being duly sworn, states as follows:

1. My name is Bechara Kobrossi. I am an adult resident of the State of Michigan and I am registered to vote in Michigan.

2. On June 5, 2018, I signed a petition to amend the Michigan Constitution. The proposal, if adopted, would provide citizens qualified to vote in Michigan with various rights related to voting and elections.

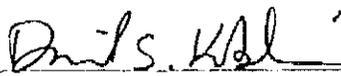
3. I have reviewed the attached petition, stamped 089742, and I hereby confirm that all my information is correct and that is my signature.

4. If there is any perceived discrepancy between my signature on the petition and a signature I've given previously it may be because I WAS IN A HURRY
at the Livonia Public Library

5. I have personal knowledge of these facts and, if called as a witness, can testify to them.


Bechara Kobrossi

Subscribed and sworn to before me on August 20, 2018.


Notary Public, State of Michigan

DANIEL S KOROBKIN
Notary Public, State of Michigan
County of Washtenaw
My Commission Expires Nov. 20, 2023
Acting in the County of Wayne

**INITIATIVE PETITION
AMENDMENT TO THE CONSTITUTION**

A proposal to amend the Michigan Constitution of 1963 by amending Article II, Section 1, is adopted by the proposal would provide certain rights to vote a secret ballot for primary and overseas voters to be sent a ballot 45 days before an election, to vote through proxy on all primary general election ballots to be electronically transmitted, to vote when obtaining a driver's license or personal identification card from the Secretary of State, unless the person elects to register to vote by mail on or before the 15th day before an election, to register to vote in person at any time with proof of residency, to vote in person without a reason, without giving a reason, and to have election results mailed to voters the attorney of record. This proposal is to be voted on at the November 5, 2013 General election.

080719

The intent of the proposal appears on the reverse side of this petition along with the provisions of the existing constitution which would be altered or abrogated if the proposal is adopted. We, the undersigned qualified and registered electors, residents in the county of Wayne, State of Michigan, respectfully petition for amendments to constitution.

WARNING — A person who knowingly signs this petition more than once, signs a name other than his or her own, signs when not a qualified and registered elector, or sets opposite his or her signature on a petition a date other than the actual date the signature was affixed, is violating the provisions of the Michigan election law.

INDICATE CITY OR TOWNSHIP IN WHICH REGISTERED TO VOTE	SIGNATURE	PRINTED NAME	STREET ADDRESS OR RURAL ROUTE	ZIP CODE	NO.	DAY	YEAR
CITY OF <input checked="" type="checkbox"/> LIVERIA	<i>Arnell Ford</i>	Arnell P. Ford	3794 Beirne	48174	06	05	18
CITY OF <input checked="" type="checkbox"/> DETROIT	<i>Michael S. McEwen</i>	MICHAEL S. MCEWEN	10519 FOLET	48214	05	05	18
CITY OF <input checked="" type="checkbox"/> LIVERIA	<i>Kim Campbell</i>	Kim Campbell	18350 Deering	48152	6	05	18
CITY OF <input checked="" type="checkbox"/> LIVONIA	<i>Shelia Marie Mullis</i>	Shelia Marie Mullis	17113 Franklin Dr	48152	6	05	18
CITY OF <input checked="" type="checkbox"/> LIVONIA	<i>Wanda Kennedy</i>	Wanda Kennedy	14678 Ingram St	48152	6	05	18
CITY OF <input checked="" type="checkbox"/> REDFORD	<i>Chris Henry</i>	Chris Henry	8000 Kenwood	48240	6	05	18
CITY OF <input checked="" type="checkbox"/> LIVONIA	<i>Beatrice Kobusz</i>	Beatrice Kobusz	1749 Seward St	48152	6	05	18
CITY OF <input checked="" type="checkbox"/> LIVONIA	<i>William Berg</i>	William Berg	4823 Overpass	48152	6	05	18
CITY OF <input checked="" type="checkbox"/> LIVONIA	<i>Sandra Thomas</i>	Sandra Thomas	35100 6 Mile Rd	48152	6	05	18
CITY OF <input checked="" type="checkbox"/> LIVONIA	<i>Dan L. Tomasi</i>	Dan L. Tomasi	35100 6 Mile Rd	48152	6	05	18

CERTIFICATE OF CIRCULATOR

The undersigned circulator of the above petition asserts that he or she is at least 18 years of age and a United States citizen; that each signature on the petition was signed in his or her presence; that he or she has neither obtained nor permitted a person to sign the petition more than once and has no knowledge of a person signing the petition more than once; and that, to his or her best knowledge and belief, each signature is the genuine signature of the person purporting to sign the petition; the person signing the petition was at the time of signing a registered elector of the city or township indicated preceding the signature, and the elector was qualified to sign the petition.

If the circulator is not a resident of Michigan, the circulator and elector must be a resident of the best qualified township which is adjacent to the petition sheet to which the signatures were subscribed by a city or township by sending a check or check money, in the amount provided the undersigned affirms that he or she is not a resident of Michigan and sends it to the jurisdiction of his state for the purpose of any legal proceeding or having just completed a probation term, established by the circulator and signed that legal process on the Secretary of State or designated agent of the Secretary of State and the same amount to the address of the circulator.

WARNING — A circulator knowingly making a false statement in the above certificate, a person not a circulator who signs as a circulator, or a person who signs a name other than his or her own as circulator, is guilty of a misdemeanor.

CIRCULATOR — Do not sign or date certificate until after circulating petition.
 Signature: *Arnell Ford*
 Date: 6, 5, 18

Printed Name of Circulator: Arnell Ford
 Complete Mailing Address (State and Number of Rural Route, if Not Rural Post Office):
3794 Beirne
48174
 City or Township, State, ZIP Code: Wayne, MI 48174

Printed Name of Elector: Arnell Ford
 Complete Mailing Address (State and Number of Rural Route, if Not Rural Post Office):
3794 Beirne
48174
 City or Township, State, ZIP Code: Wayne, MI 48174

Printed Name of Elector: Arnell Ford
 Complete Mailing Address (State and Number of Rural Route, if Not Rural Post Office):
3794 Beirne
48174
 City or Township, State, ZIP Code: Wayne, MI 48174

STATE OF MICHIGAN
BOARD OF STATE CANVASSERS

In re Petition of Promote the Vote

AFFIDAVIT OF KELLIE KONSOR

Kellie Konsor, being duly sworn, states as follows:

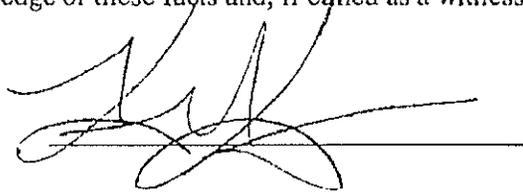
1. My name is Kellie Konsor. I am an adult resident of the State of Michigan and I am registered to vote in Michigan.

2. On June 1, 2018, I signed a petition to amend the Michigan Constitution. The proposal, if adopted, would provide citizens qualified to vote in Michigan with various rights related to voting and elections.

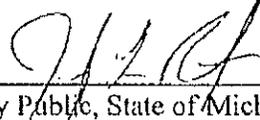
3. I have reviewed the attached petition, stamped 25754, and I hereby confirm that all my information is correct and that is my signature.

4. If there is any perceived discrepancy between my signature on the petition and a signature I've given previously it may be because N/A

5. I have personal knowledge of these facts and, if called as a witness, can testify to them.



Subscribed and sworn to before me on AUGUST 21, 2018.


Notary Public, State of Michigan

Jeannie L. Rivett
ACF 103133 BA7 CC 1/14

**INITIATIVE PETITION
AMENDMENT TO THE CONSTITUTION**

A proposal to amend the Michigan Constitution of 1963 by amending Article II, Section 4. If adopted the proposal would provide citizens qualified to vote in Michigan with the following rights: to vote a secret ballot; for military and overseas voters to be sent a ballot 45 days before an election; to vote straight party on all partisan general election ballots; to be automatically registered to vote when obtaining a driver's license or personal identification card from the Secretary of State, unless the person declines; to register to vote by mail on or before the 15th day before an election; to register to vote in person at any time with proof of residency; to vote an absentee ballot, by mail or in person, without giving a reason; and to have election results audited to ensure the accuracy of elections. This proposal is to be voted on at the November 5, 2018 general election.

The full text of the proposal appears on the reverse side of this petition, along with the provisions of the existing constitution which would be altered or abrogated if the proposal is adopted. We, the undersigned qualified and registered electors, residents in the county of Washtenaw State of Michigan, respectively petition for amendment to constitution.

WARNING — A person who knowingly signs this petition more than once, signs a name other than his or her own, signs when not a qualified and registered elector, or sets opposite his or her signature on a petition, a date other than the actual date the signature was affixed, is violating the provisions of the Michigan election law.

INDICATE CITY OR TOWNSHIP IN WHICH REGISTERED TO VOTE		SIGNATURE	PRINTED NAME	STREET ADDRESS OR RURAL ROUTE	ZIP CODE	DATE OF SIGNING		
CITY OF	TOWNSHIP OF					MO	DAY	YEAR
<input type="checkbox"/>	<input type="checkbox"/>	<i>William J. Cordeiro</i>	William J. Cordeiro	505 Nicholson	48706	Jan	1	18
<input type="checkbox"/>	<input type="checkbox"/>	<i>Silverio U. Beberil</i>	Silverio U. Beberil	303 Marchand St	48706	6	11	18
<input type="checkbox"/>	<input type="checkbox"/>	<i>Kellie Vorsov</i>	Kellie Vorsov	314 Adams Street	48708	10	1	18
<input type="checkbox"/>	<input type="checkbox"/>							
<input type="checkbox"/>	<input type="checkbox"/>							
<input type="checkbox"/>	<input type="checkbox"/>							
<input type="checkbox"/>	<input type="checkbox"/>							
<input type="checkbox"/>	<input type="checkbox"/>							
<input type="checkbox"/>	<input type="checkbox"/>							
<input type="checkbox"/>	<input type="checkbox"/>							

CERTIFICATE OF CIRCULATOR

The undersigned circulator of the above petition asserts that he or she is 18 years of age or older and a United States citizen; that each signature on the petition was signed in his or her presence; that he or she has neither caused nor permitted a person to sign the petition more than once and has no knowledge of a person signing the petition more than once; and that, to his or her best knowledge and belief, each signature is the genuine signature of the person purporting to sign the petition. Signing the petition was at the time of signing a registered elector of the city or township indicated preceding the signature, and the elector was qualified to sign the petition.

If the circulator is not a resident of Michigan, the circulator shall make a cross or check mark in the box provided, otherwise each signature on this petition sheet is invalid and the signatures will not be counted by filing ballot by mailing a cross or check mark in the box provided. The undersigned circulator asserts that he or she is not a resident of Michigan and agrees to accept the jurisdiction of this state for the purpose of any legal proceeding or hearing that concerns a petition sheet submitted by the circulator and agrees that legal process served on the Secretary of State or a designee agent of the Secretary of State has the same effect as if personally served on the circulator.

WARNING — A circulator knowingly making a false statement in the above certificate, a person not a circulator who signs as a circulator, or a person who signs a name other than his or her own as circulator is guilty of a misdemeanor.

Paid for with regulated funds by Promote the Vote, 2566 Woodward Ave., Detroit, MI 48221.

CIRCULATOR — Do not sign or date certificate until after circulating petition.

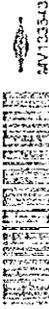
Elizabeth Drapeau
(Signature of Circulator) 06 10 18
(Date)

Elizabeth Drapeau
(Printed Name of Circulator)

1110 Jordan St
Complete Responder's Address (Street and Number or Rural Route) [Do Not Enter a Post Office Box]

Washtenaw, MI 48764
(City or Township, State, Zip Code)

(County of Registration, if Registered in Vote, of a Circulator who is not a Resident of Michigan)



MI103343

STATE OF MICHIGAN
BOARD OF STATE CANVASSERS

In re Petition of Promote the Vote

AFFIDAVIT OF MARK LALLY

Mark Lally, being duly sworn, states as follows:

1. My name is Mark Lally. I am an adult resident of the State of Michigan and I am registered to vote in Michigan.

2. On June 14, 2018, I signed a petition to amend the Michigan Constitution. The proposal, if adopted, would provide citizens qualified to vote in Michigan with various rights related to voting and elections.

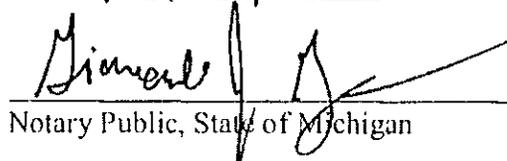
3. I have reviewed the attached petition, stamped 043405, and I hereby confirm that all my information is correct and that is my signature.

4. If there is any perceived discrepancy between my signature on the petition and a signature I've given previously it may be because ..
.....
.....

5. I have personal knowledge of these facts and, if called as a witness, can testify to them.



Subscribed and sworn to before me on AUG 19, 2018.



Notary Public, State of Michigan

GIANCARLO J. GUZMAN
Notary Public, State of Michigan
County of Oakland
My Commission Expires Apr. 30, 2024
Acting in the County of St. Clair

**INITIATIVE PETITION
AMENDMENT TO THE CONSTITUTION**

A proposal to amend the Michigan Constitution of 1963 by amending Article 11, Section 4, if adopted this proposal would provide citizens residing in Michigan with the following rights: to vote a secret ballot; for primary and general elections to be held on the same day; to vote a straight party on all partisan general election ballots; to be automatically registered to vote when obtaining a driver's license or personal identification card from the Secretary of State, unless the person declines; to register to vote by mail on or before the 15th day before an election; to register to vote in person at any time with proof of residency; in vast an absentee ballot; by mail or in person, without giving a reason; and to have election results available to ensure the accuracy of counts. This proposal is to be voted on at the election on the 15th day before an election, to register to vote in person at any time with proof of residency; in vast an absentee ballot; by mail or in person, without giving a reason; and to have election results available to ensure the accuracy of counts.

643405

The full text of this proposal appears on the reverse side of this petition along with the provisions of the existing constitution which would be amended or abrogated if the proposal is adopted. We, the undersigned qualified and registered electors, residents in the county of St. Clair, State of Michigan, respectfully petition for amendment to constitution.

WARNING — A person who knowingly signs this petition more than once, signs a name other than his or her own, signs when not a qualified and registered elector, or sets opposite his or her signature on a petition, a date other than the actual date the signature was affixed, is violating the provisions of the Michigan election law.

INDICATE CITY OR TOWNSHIP IN WHICH REGISTERED TO VOTE	SIGNATURE	PRINTED NAME	STREET ADDRESS OR RURAL ROUTE	ZIP CODE	DATE OF SIGNING	
					MO	YEAR
CITY OF <input type="checkbox"/> MACLEAVE CITY	<i>Mary Ann</i>	WACK LALLY	405 N. MAIN ST.	48064	6	14 18
CITY OF <input type="checkbox"/> IFA	<i>Michelle</i>	MIKE WALTER	7648 Sunny Oak Rd	48067	6	14 18
CITY OF <input type="checkbox"/> ALGONA	<i>Robert Williams</i>	PERSONAL ANALYST	445 WILSONS DR	48067	6	14 18
CITY OF <input type="checkbox"/> IFA	<i>Cheryl Williams</i>	Eileen Walters	6800 Church Rd.	48068	6	14 18
CITY OF <input type="checkbox"/> MACLEAVE CITY	<i>Cheryl Williams</i>	Pete Melbrum	7011 Main St	48073	6	14 18
CITY OF <input type="checkbox"/> IFA	<i>Cheryl Williams</i>	Joseph Hirsch	2125 Colwell Rd	48023	4	14 18
CITY OF <input type="checkbox"/> CLAY	<i>Cheryl Williams</i>	Peter Campbell	6171 Fremont	48061	6	14 18
CITY OF <input type="checkbox"/> PORT HURON	<i>Cheryl Williams</i>	AUSUM BOLMAN	7577 Spring St	48074	6	14 18
CITY OF <input type="checkbox"/> SHELBY	<i>Cheryl Williams</i>	Clifford White	8055 Colwell Dr	48061	6	14 18
CITY OF <input type="checkbox"/> ST. MAR	<i>MS Bailey</i>	Mary Joan Bailey	7255 Fifth St	48079	6	14 18

CERTIFICATE OF CIRCULATOR
The undersigned circulator of the above petition asserts that he or she is 18 years of age or older and a United States citizen; that each signature on this petition was signed in his or her own name, that he or she has neither caused nor permitted a person to sign the petition more than once and has not knowingly or negligently caused the petition more than once; and that, to his or her best knowledge and belief, each signature is the genuine signature of the person purporting to sign the petition; the person signing the petition was at the time of signing a registered elector of the city or township indicated preceding the signature, and the action was qualified to sign the petition.

If the circulator is not a resident of Michigan, the circulator shall make a cross of check mark in the box provided, otherwise each signature on this petition shall be signed by a living elector; by making a cross of check mark in the box provided, the undersigned circulator asserts that he or she is not a resident of Michigan and agrees to accept the jurisdiction of this state for the purpose of any legal proceeding or hearing that concerns a petition filed or bearing that concerns a petition filed as it personally served on the circulator served on the Secretary of State or a designee of the Secretary of State.

WARNING — A circulator knowingly making a false statement in the above certificate, a person not a circulator who signs as a circulator, or a person who signs a name other than his or her own as circulator is guilty of a misdemeanor.

Signature of Circulator: Mary Ann Bailey
 (Printed Name of Circulator)
 19331 Stansbury St
 Council Bluffs, IA 51503
 (City or Township, State, Zip Code)
 CIRCULATOR DO NOT SIGN OR DATE CERTIFICATE UNTIL AFTER CIRCULATING PETITION.
 Date: 6.14.18
 (Date)
 County of Registration: St. Clair, or a Circulator who is not a Resident of Michigan

STATE OF MICHIGAN

BOARD OF STATE CANVASSERS

In re Petition of Promote the Vote

_____ /

AFFIDAVIT OF LAUREN LEGNER

Lauren Legner, being duly sworn, states as follows:

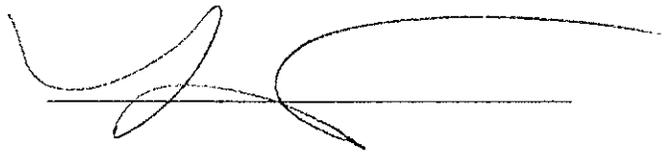
1. My name is Lauren Legner. I am an adult resident of the State of Michigan and I am registered to vote in Michigan.

2. On March 18, 2018, I signed a petition to amend the Michigan Constitution. The proposal, if adopted, would provide citizens qualified to vote in Michigan with various rights related to voting and elections.

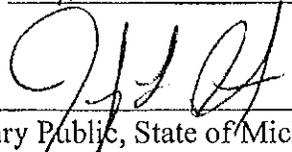
3. I have reviewed the attached petition, stamped 25563, and I hereby confirm that all my information is correct and that is my signature.

4. If there is any perceived discrepancy between my signature on the petition and a signature I've given previously it may be because N/A

5. I have personal knowledge of these facts and, if called as a witness, can testify to them.



Subscribed and sworn to before me on AUGUST 31, 2018.



Notary Public, State of Michigan

JOSEPH L. RIVET
ACTING IN BAY COUNTY

INITIATIVE PETITION AMENDMENT TO THE CONSTITUTION

A proposal to amend the Michigan Constitution of 1963 by amending Article II, Section 4, if adopted the proposal would provide citizens qualified to vote in Michigan with the following rights: to vote a secret ballot; for military and overseas voters to be sent a ballot 45 days before an election; to vote straight party on all partisan general election ballots; to be automatically registered to vote when obtaining a driver's license or personal identification card from the Secretary of State, unless the person declines; to register to vote by mail on or before the 15th day before an election; to register to vote in person at any time with proof of residency; to vote an absentee ballot, by mail or in person, without giving a reason; and to have election results audited to ensure the accuracy of elections. This proposal is to be voted on at the November 6, 2018 general election.

The full text of the proposal appears on the reverse side of this petition along with the provisions of the existing constitution which would be altered or abrogated if the proposal is adopted.
We, the undersigned qualified and registered electors, residents in the county of Washtenaw, State of Michigan, respectively petition for amendment to constitution.

25563

WARNING — A person who knowingly signs this petition more than once, signs a name other than his or her own, signs when not a qualified and registered elector, or sets opposite his or her signature on a petition, a date other than the actual date the signature was affixed, is violating the provisions of the Michigan election law.

INDICATE CITY OR TOWNSHIP IN WHICH REGISTERED TO VOTE	SIGNATURE	PRINTED NAME	STREET ADDRESS OR RURAL ROUTE	ZIP CODE	DATE OF SIGNING		
					MO	DAY	YEAR
CITY OF <input checked="" type="checkbox"/> DAY	<i>[Signature]</i>	Trevi's Myers	1350 JAMES RD	48720	3	18	18
CITY OF <input checked="" type="checkbox"/> DAY	<i>[Signature]</i>	UNION UNION	220 S. HUNTINGTON	48708	3	18	18
CITY OF <input checked="" type="checkbox"/> DAY	<i>[Signature]</i>	Daniel Cohen	804 WOLF RD	48706	3	18	18
CITY OF <input checked="" type="checkbox"/> DAY	<i>[Signature]</i>	JANUSZYNOWSKI	907 Michigan Ave	48708	3	18	18
TOWNSHIP OF <input type="checkbox"/>							
TOWNSHIP OF <input type="checkbox"/>							
TOWNSHIP OF <input type="checkbox"/>							
TOWNSHIP OF <input type="checkbox"/>							
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TOWNSHIP OF <input type="checkbox"/>							
TOWNSHIP OF <input type="checkbox"/>							
TOWNSHIP OF <input type="checkbox"/>							

CERTIFICATE OF CIRCULATOR

The undersigned circulator of the above petition asserts that he or she is 18 years of age or older and a United States citizen; that each signature on the petition was signed in his or her presence; that he or she has neither caused nor permitted a person to sign the petition more than once and has no knowledge of a person signing the petition more than once; and that, to his or her best knowledge and belief, each signature is the genuine signature of the person purporting to sign the petition, the person signing the petition was at the time of signing a registered elector of the city or township indicated preceding the signature, and the elector was qualified to sign the petition.

If the circulator is not a resident of Michigan, the circulator shall make a cross or check mark in the box provided, otherwise each signature on this petition sheet is invalid and the signatures will not be counted by a filing official. By making a cross or check mark in the box provided, the undersigned circulator asserts that he or she is not a resident of Michigan and agrees to accept the jurisdiction of this state for the purpose of any legal proceeding or hearing that concerns a petition sheet executed by the circulator and agrees that legal process served on the Secretary of State or a designated agent of the Secretary of State has the same effect as if personally served on the circulator.

WARNING — A circulator knowingly making a false statement in the above certificate, a person not a circulator who signs as a circulator, or a person who signs a name other than his or her own as circulator is guilty of a misdemeanor.

Paid for with regulated funds by Promote the Vote, 2966 Woodward Ave., Detroit, MI 48201.



MV035467

CIRCULATOR — Do not sign or date certificate until after circulating petition
[Signature]
 (Signature of Circulator) 3 1 18 (Date)

Robert Kreuze
 (Printed Name of Circulator)
1417 Mackinaw St
 Complete Residence Address (Street and Number or Rural Route) [Do Not Enter a Post Office Box]
Saginaw, MI 48602
 (City or Township, State, Zip Code)

(County of Registration, If Registered to Vote, of a Circulator who is not a Resident of Michigan)

STATE OF MICHIGAN
BOARD OF STATE CANVASSERS

In re Petition of Promote the Vote

AFFIDAVIT OF SARAH SYRETTA PITTS

Sarah Syretta Pitts, being duly sworn, states as follows:

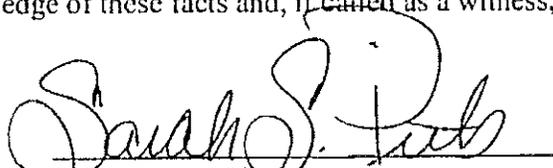
1. My name is Sarah Syretta Pitts. I am an adult resident of the State of Michigan and I am registered to vote in Michigan.

2. On May 13, 2018, I signed a petition to amend the Michigan Constitution. The proposal, if adopted, would provide citizens qualified to vote in Michigan with various rights related to voting and elections.

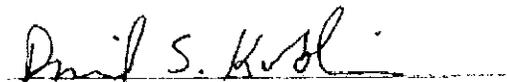
3. I have reviewed the attached petition, stamped 063569, and I hereby confirm that all my information is correct and that is my signature.

4. If there is any perceived discrepancy between my signature on the petition and a signature I've given previously it may be because I was with my cousins and we were rushing to get into the Michael's Store to do our shopping.

5. I have personal knowledge of these facts and, if called as a witness, can testify to them.


Sarah Syretta Pitts

Subscribed and sworn to before me on August 20, 2018.


Notary Public, State of Michigan

DANIEL S KOROBKIN
Notary Public, State of Michigan
County of Washtenaw
My Commission Expires Nov. 20, 2023
Acting in the County of Wayne

INITIATIVE PETITION AMENDMENT TO THE CONSTITUTION

A proposal to amend the Michigan Constitution of 1963 by amending Article II, Section 4, if adopted the proposal would provide citizens qualified to vote in Michigan with the following rights: to vote a secret ballot; for mail and overseas voters to be sent a ballot 45 days before an election; to vote straight party on all partisan general election ballots; to be automatically registered to vote when obtaining a driver's license or personal identification card from the Secretary of State, unless the person declines; to register to vote by mail on or before the 15th day before an election; to register to vote in person at any time with proof of residency; to vote an absentee ballot, by mail or in person, without giving a reason; and to have election results audited to ensure the accuracy of elections. This proposal is to be voted on at the November 6, 2018 general election.

063569

The full text of the proposal appears on the reverse side of this petition along with the provisions of the existing constitution which would be altered or abrogated if the proposal is adopted.

We, the undersigned qualified and registered electors, residents in the county of Wayne, State of Michigan, respectively petition for amendment to constitution

WARNING — A person who knowingly signs this petition more than once, signs a name other than his or her own, signs when not a qualified and registered elector, or sets opposite his or her signature on a petition, a date other than the actual date the signature was affixed, is violating the provisions of the Michigan election law.

INDICATE CITY OR TOWNSHIP IN WHICH REGISTERED TO VOTE	SIGNATURE	PRINTED NAME	STREET ADDRESS OR RURAL ROUTE	ZIP CODE	MO	DAY	YEAR
<input checked="" type="checkbox"/> CITY OF DETROIT		Swann Pitts	10522 Redmont	48220	05	13	18
<input checked="" type="checkbox"/> CITY OF DETROIT		Todd Hark	23545 Kross St.	48219	5	13	18
<input checked="" type="checkbox"/> CITY OF DETROIT		Jessica Moore	28545 Kross St	48219	5	13	18
<input checked="" type="checkbox"/> CITY OF ALLEN PARK		Cassandra Black	15229 Dasher Ave	48101	5	13	18
<input checked="" type="checkbox"/> CITY OF LIVONIA		Timothy Cornet	18055 Inker Rd.	48152	5	13	18
<input checked="" type="checkbox"/> CITY OF LIVONIA		Leanne Corneil	18235 Inker Rd	48152	5	13	18
<input checked="" type="checkbox"/> CITY OF DETROIT		Risa Medel	17571 Rosedale	48220	5	13	18
<input checked="" type="checkbox"/> CITY OF DEARBORN		Carey Smith	1314 GARFIELD AVE #12	48146	5	13	18
<input checked="" type="checkbox"/> CITY OF INLAND PARK		Sarah Winstanley	18480 FAULFIELD ST	48221	5	13	18

CERTIFICATE OF CIRCULATOR

The undersigned circulator of the above petition asserts that he or she is 18 years of age or older and a United States citizen; that each signature on the petition was signed in his or her presence; that he or she has neither caused nor permitted a person to sign the petition more than once and has no knowledge of a person signing the petition more than once; and that he or her best knowledge and belief, each signature is the genuine signature of the person purporting to sign the petition, the person signing the petition was at the time of signing a registered elector of the city or township indicated preceding the signature, and the elector was qualified to sign the petition.

If the circulator is not a resident of Michigan, the circulator shall make a cross or check mark in the box provided, otherwise each signature on this petition shall be invalid and the signatures will not be counted by a filing official. By making a cross or check mark in the box provided, the undersigned circulator asserts that he or she is not a resident of Michigan and agrees to accept the jurisdiction of this state for the purpose of any legal proceeding or inuring that concerns a petition sheet executed by the circulator and agrees that legal process served on the Secretary of State or a designated agent of the Secretary of State has the same effect as if personally served on the circulator.

WARNING — A circulator knowingly making a false statement in the above certificate, a person not a circulator who signs as a circulator, or a person who signs a name other than his or her own as circulator is guilty of a misdemeanor.

CIRCULATOR — Do not sign or date certificate until after circulating petition.
John Ager 5/13/18
 (Printed Name of Circulator) (Date)

John Ager
 (Signature of Circulator)
John Ager
 (City or Township, State, Zip Code)

2022 Charles St
 (City or Township, State, Zip Code)

17571 Rosedale
 (City or Township, State, Zip Code)

1314 Garfield Ave #12
 (City or Township, State, Zip Code)

18480 Fairfield St
 (City or Township, State, Zip Code)

17571 Rosedale
 (City or Township, State, Zip Code)

Printed Name of Circulator: John Ager
 Signature of Circulator: [Signature]
 Complete Residence Address (Street and Number or Rural Route) (Do Not Enter a Post Office Box): 17571 Rosedale
 (City or Township, State, Zip Code): 48220

STATE OF MICHIGAN
BOARD OF STATE CANVASSERS

In re Petition of Promote the Vote

_____ /

AFFIDAVIT OF LUKAS REYES

Lukas Reyes, being duly sworn, states as follows:

1. My name is Lukas Reyes. I am an adult resident of the State of Michigan and I am registered to vote in Michigan.

2. On June 1, 2018, I signed a petition to amend the Michigan Constitution. The proposal, if adopted, would provide citizens qualified to vote in Michigan with various rights related to voting and elections.

3. I have reviewed the attached petition, stamped 012777 and I hereby confirm that all my information is correct and that is my signature.

~~4. If there is any perceived discrepancy between my signature on the petition and a signature I've given previously it may be because _____~~

5. I have personal knowledge of these facts and, if called as a witness, can testify to them.

Lukas Reyes

Subscribed and sworn to before me on Aug 19, 2018.

Gratiot County
Michigan

Nancy E. Gallagher

Notary Public, State of Michigan

Nancy E. Gallagher

Notary Public, my commission expires on 10/05/2019

**INITIATIVE PETITION
AMENDMENT TO THE CONSTITUTION**

A proposal to amend the Michigan Constitution of 1963 by amending Article II, Section 4, it adopted the proposal would provide citizens qualified to vote in Michigan with the following rights: to vote a secret ballot; for military and overseas voters to be sent a ballot 45 days before an election; to vote straight party on all partisan general election ballots; to be automatically registered to vote when obtaining a driver's license or personal identification card from the Secretary of State, unless the person declines; to register to vote by mail on or before the 15th day before an election; to register to vote in person at any time with proof of residency; to vote an absentee ballot, by mail or in person, without giving a reason; and to have election results audited to ensure the accuracy of elections. This proposal is to be voted on at the November 5, 2018 general election.

The full text of the proposal appears on the reverse side of this petition along with the provisions of the existing constitution which would be altered or abrogated if the proposal is adopted.

We, the undersigned qualified and registered electors, residents in the county of SPRING ARROW State of Michigan, respectively petition for amendment to constitution.

WARNING — A person who knowingly signs this petition more than once, signs a name other than his or her own, signs when not a qualified and registered elector, or sets opposite his or her signature on a petition, a date other than the actual date the signature was affixed, is violating the provisions of the Michigan election law.

INDICATE CITY OR TOWNSHIP IN WHICH REGISTERED TO VOTE		SIGNATURE	PRINTED NAME	STREET ADDRESS OR RURAL ROUTE	ZIP CODE	DATE OF SIGNING		
CITY OF <input type="checkbox"/>	TOWNSHIP OF <input type="checkbox"/>					MIC	DAY	YEAR
CITY OF <input type="checkbox"/>	TOWNSHIP OF <input type="checkbox"/>	<i>Susan Zass</i>	SUSAN ZASS	430 N. Maple	48807	6	1	2018
CITY OF <input type="checkbox"/>	TOWNSHIP OF <input type="checkbox"/>	<i>Sheriff Zass</i>	SHERIFF ZASS	3797 W. RICHMOND RD	48857	6	1	2018
CITY OF <input type="checkbox"/>	TOWNSHIP OF <input type="checkbox"/>	<i>Lukas Reyer</i>	Lukas Reyer	911 Eastline Ave	48801	6	1	2018
CITY OF <input type="checkbox"/>	TOWNSHIP OF <input type="checkbox"/>	<i>Fun H</i>	Sordani-Karime	410 W. Tyrell	48880	6	1	2018
CITY OF <input type="checkbox"/>	TOWNSHIP OF <input type="checkbox"/>							
CITY OF <input type="checkbox"/>	TOWNSHIP OF <input type="checkbox"/>							
CITY OF <input type="checkbox"/>	TOWNSHIP OF <input type="checkbox"/>							
CITY OF <input type="checkbox"/>	TOWNSHIP OF <input type="checkbox"/>							
CITY OF <input type="checkbox"/>	TOWNSHIP OF <input type="checkbox"/>							
CITY OF <input type="checkbox"/>	TOWNSHIP OF <input type="checkbox"/>							
CITY OF <input type="checkbox"/>	TOWNSHIP OF <input type="checkbox"/>							

CERTIFICATE OF CIRCULATOR

The undersigned circulator of the above petition asserts that he or she is 18 years of age or older and a United States citizen; that each signature on this petition was signed in his or her presence; that he or she has neither created nor permitted a person to sign the petition more than once and has no knowledge of a person signing the petition more than once; and that, to the best of his or her knowledge and belief, each signature is the genuine signature of the person purporting to sign the petition, that the person signing the petition was at the time of signing a registered elector of the city or township indicated preceding the signature, and the elector was qualified to sign the petition.

If the circulator is not a resident of Michigan, the circulator shall make a cross or check mark in the box provided, otherwise each signature on this petition shall be treated as if made by a Michigan citizen. By making a cross or check mark in the box provided, the undersigned circulator asserts that he or she is not a resident of Michigan and agrees to accept the jurisdiction of this state for the purpose of any legal proceeding or hearing that concerns a petition as well as consented by the circulator and agrees that legal process served on the Secretary of State or a designated agent of the Secretary of State has the same effect as if personally served on the circulator.

WARNING — A circulator knowingly making a false statement in the above certificate, a person not a circulator who signs as a circulator, or a person who signs a name other than his or her own as circulator is guilty of a misdemeanor.

Paid for with regulated funds by Promote the Vote, 2368 Woodward Ave., Detroit, MI 48201.

CIRCULATOR — Do not sign or date certificate until after circulating petition.

(Signature of Circulator) *[Signature]* (Date) 6/1/2018
 (Printed Name of Circulator) JANIS SASS
 Complete Residence Address (Street and Number or Rural Route) (City or Post Office Box) 430 N. Maple Street, Spring Arrow, MI
 (City or Township, State, Zip Code) Spring Arrow, Michigan 48807

(Capacity of Registration, if Registered to Vote, of a Circulator who is not a Resident of Michigan)

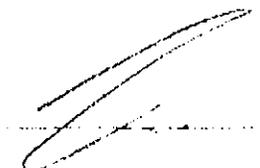
STATE OF MICHIGAN
BOARD OF STATE CANVASSERS

In re Petition of Promote the Vote

AFFIDAVIT OF MICHAEL CELSI

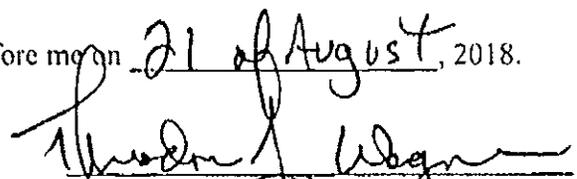
Michael Celsi, being duly sworn, states as follows:

1. My name is Michael Celsi. I am an adult resident of the State of Michigan and I am registered to vote in Michigan.
2. On May 24, 2018, I signed a petition to amend the Michigan Constitution. The proposal, if adopted, would provide citizens qualified to vote in Michigan with various rights related to voting and elections.
3. I have reviewed the attached petition, stamped 052199, and I hereby confirm that all my information is correct and that is my signature.
4. I have personal knowledge of these facts and, if called as a witness, can testify to them.



Michael Celsi

Subscribed and sworn to before me on 21 of August, 2018.



Notary Public, State of Michigan

THEODORE J. WAGNER
 NOTARY PUBLIC, STATE OF MI
 COUNTY OF WAYNE
 MY COMMISSION EXPIRES Jan 1, 2023
 ACTING IN COUNTY OF Wayne

STATE OF MICHIGAN
BOARD OF STATE CANVASSERS

In re Petition of Promote the Vote

AFFIDAVIT OF KIMBERLY M. CHAMBERLAIN

Kimberly M. Chamberlain, being duly sworn, states as follows:

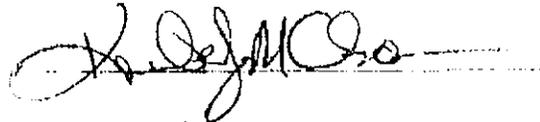
1. My name is Kimberly M. Chamberlain. I am an adult resident of the State of Michigan and I am registered to vote in Michigan.

2. On May 26, 2018, I signed a petition to amend the Michigan Constitution. The proposal, if adopted, would provide citizens qualified to vote in Michigan with various rights related to voting and elections.

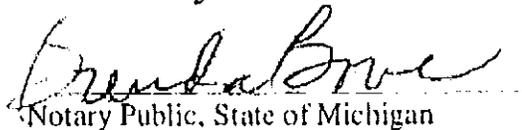
3. I have reviewed the attached petition, stamped 036431, and I hereby confirm that all my information is correct and that is my signature.

4. If there is any perceived discrepancy between my signature on the petition and a signature I've given previously it may be because I have carpal tunnel in my right hand and writing is difficult.

5. I have personal knowledge of these facts and, if called as a witness, can testify to them.



Subscribed and sworn to before me on Aug. 21, 2018.


Notary Public, State of Michigan

BRENDA BOVE
NOTARY PUBLIC, STATE OF MI
COUNTY OF OAKLAND
MY COMMISSION EXPIRES Nov 3, 2020
ACTING IN COUNTY OF Oakland

INITIATIVE PETITION
 AMENDMENT TO THE CONSTITUTION

A proposal to amend the Michigan Constitution of 1963 by amending Article II, Section 4, if adopted, the proposal would provide citizens qualified to vote in Michigan with the following right: to vote in person, absent for military and overseas voters to be sent a ballot 45 days before an election, to vote through proxy on all partisan general election ballots, to be automatically registered to vote when obtaining a driver's license or personal identification card from the Secretary of State, unless the person elects to register to register to vote by mail on or before the 15th day before an election, to register to vote in person at any time with proof of residency, to vote at a polling station, by mail or in person, without giving a reason, and to have election results applied to a voter in accordance with the provisions of this proposal to be voted on at the November 6, 2018 general election.

085681

The full text of the proposal appears on the reverse side of this petition along with the provisions of the existing constitution which would be altered or abrogated if the proposal is accepted. We, the undersigned qualified and registered voters, residents in the county of Washtenaw State of Michigan, respectfully petition for enactment of the constitution.

WARNING — A person who knowingly signs this petition more than once, signs a name other than his or her own, signs when not a qualified and registered elector of sets opposite his or her signature on a petition, a date other than the actual date the signature was affixed, is violating the provisions of the Michigan election law.

INDICATE CITY OR TOWNSHIP IN WHICH REGISTERED TO VOTE	SIGNATURE	PRINTED NAME	STREET ADDRESS OR RURAL ROUTE	ZIP CODE	DATE OF SIGNING
CITY OF <u>Ann Arbor</u>	<u>[Signature]</u>	<u>Robert J. Derron</u>	<u>2011 Terrace</u>	<u>48106</u>	<u>5 24 18</u>
CITY OF <u>Ann Arbor</u>	<u>[Signature]</u>	<u>Richard Williams</u>	<u>99 W Robert</u>	<u>48106</u>	<u>5 26 2018</u>
CITY OF <u>Ann Arbor</u>	<u>[Signature]</u>	<u>Ashley R. West</u>	<u>57 Harold Ave</u>	<u>48106</u>	<u>5 26 18</u>
CITY OF <u>Ann Arbor</u>	<u>[Signature]</u>	<u>Angie Simace</u>	<u>1404 Central</u>	<u>48106</u>	<u>5 26 18</u>
CITY OF <u>Ann Arbor</u>	<u>[Signature]</u>	<u>Kindy M. Chamberlain</u>	<u>80 W Woodworth Hwy Blvd</u>	<u>48106</u>	<u>5 26 18</u>
CITY OF <u>Ann Arbor</u>	<u>[Signature]</u>	<u>Robert Fuller</u>	<u>29146 Melville Ave</u>	<u>48106</u>	<u>5 26 18</u>
CITY OF <u>Ann Arbor</u>	<u>[Signature]</u>	<u>Scott Wallace</u>	<u>515 Knights</u>	<u>48107</u>	<u>5 26 18</u>
CITY OF <u>Ann Arbor</u>	<u>[Signature]</u>	<u>Carman M. Myers</u>	<u>3448 Bonner</u>	<u>48106</u>	<u>5 26 18</u>
CITY OF <u>Ann Arbor</u>	<u>[Signature]</u>	<u>Kim Williams</u>	<u>1390 Christine Terrace</u>	<u>48107</u>	<u>5 26 18</u>
CITY OF <u>Ann Arbor</u>	<u>[Signature]</u>	<u>John Haley</u>	<u>271 Gifford</u>	<u>48106</u>	<u>5 26 18</u>

CIRCULATOR — Do not sign or date certificate until after circulating petition.

CERTIFICATE OF CIRCULATOR
 I, the undersigned circulator of the above petition, assents that he or she is 18 years of age or older and a United States citizen, that each signature on the petition was signed in his or her presence, that he or she has neither caused nor permitted a person to sign the petition more than once and has no knowledge of a person signing the petition more than once, and that, to his or her best knowledge and belief, each signature is the genuine signature of the person purporting to sign the petition, the person signing the petition was at the time of signing a registered elector of the city or township indicated preceding the signature, and the elector was qualified to sign the petition.

Signature of Circulator: [Signature]
 Printed Name of Circulator: GREGGORY D AUBREY
 Complete Residence Address (Street and Number or Rural Route), Do Not Enter a Post Office Box: 1576 SILVER ST
 City or Township, State, Zip/Post: ANN ARBOR MI 48106

WARNING — A circulator knowingly making a false statement in the above certificate, a person not a circulator who signs as a circulator or a person who signs a name other than his or her own as circulator is guilty of a misdemeanor.

County of Registration, if Registered to Vote, of a Circulator who is not a Resident of Michigan: Washtenaw

STATE OF MICHIGAN
BOARD OF STATE CANVASSERS

In re Petition of Promote the Vote

AFFIDAVIT OF DWANNA JOSEPH

Dwanne Joseph, being duly sworn, states as follows:

1. My name is Dwanne Joseph. I am an adult resident of the State of Michigan and I am registered to vote in Michigan.

2. On June 14, 2018, I signed a petition to amend the Michigan Constitution. The proposal, if adopted, would provide citizens qualified to vote in Michigan with various rights related to voting and elections.

3. I have reviewed the attached petition, stamped 039618, and I hereby confirm that all my information is correct and that is my signature.

4. If there is any perceived discrepancy between my signature on the petition and a signature I've given previously it may be because I was in a
hurry.

5. I have personal knowledge of these facts and, if called as a witness, can testify to them.

Dwanne M. Joseph
Dwanne M. Joseph

Subscribed and sworn to before me on 21 of August, 2018.

VICKY SCHWEIKHART
Notary Public, State of Michigan
County of Oakland
My Commission Expires 05 04 2024
Acting in the County of Oakland

Vicky Schweikhart 8-21-2018
Notary Public, State of Michigan
Vicky Schweikhart

**INITIATIVE PETITION
AMENDMENT TO THE CONSTITUTION**

A proposal to amend the Michigan Constitution of 1963 by amending Article II, Section 4, if adopted the proposal would provide abstracts qualified to vote in Michigan with the following rights: to vote a secret ballot; for military and overseas voters to be sent a ballot 45 days before an election; to vote straight party on all partisan general election ballots; to be automatically registered to vote when obtaining a driver's license or personal identification card from the Secretary of State unless the person declines to register to vote by mail on or before the 15th day before an election; to register to vote in person at any time with proof of residency; to vote an absentee ballot, by mail or in person without giving a reason; and to have election results studied to ensure the accuracy of elections. This proposal is to be voted on at the November 6, 2018 general election.

The full text of the proposal appears on the reverse side of this petition along with the provisions of the existing constitution which would be altered or abrogated if the proposal is adopted.
We, the undersigned qualified and registered electors, residents in the county of Washtenaw, State of Michigan, respectfully petition for amendment to constitution.

035618

WARNING — A person who knowingly signs this petition more than once, signs a name other than his or her own, signs when not a qualified and registered elector, or sets opposite his or her signature on a petition, a date other than the actual date the signature was affixed, is violating the provisions of the Michigan election law.

NOVATE CITY OR TOWNSHIP IN WHICH REGISTERED TO VOTE	SIGNATURE	PRINTED NAME	STREET ADDRESS OR RURAL ROUTE	ZIP CODE	MO	DAY	YEAR
CITY OF Ann Arbor	[Signature]	[Name]	1772 Diana Drive	48106	6	14	18
CITY OF <u>Ann Arbor</u>	<u>[Signature]</u>	<u>Abdul Linn</u>	<u>2048 Fernhill Dr</u>	<u>48106</u>	<u>6</u>	<u>14</u>	<u>18</u>
CITY OF <u>Ann Arbor</u>	<u>[Signature]</u>	<u>Andrew Reed</u>	<u>6308 Woodcrest Drive</u>	<u>48108</u>	<u>6</u>	<u>14</u>	<u>18</u>
CITY OF <u>Ann Arbor</u>	<u>[Signature]</u>	<u>Nichole Cannon</u>	<u>3195 Culbertson Ave #13</u>	<u>48107</u>	<u>6</u>	<u>14</u>	<u>18</u>
CITY OF <u>Ann Arbor</u>	<u>[Signature]</u>	<u>Madison Kerns</u>	<u>3900 Trout Creek Lane</u>	<u>48107</u>	<u>6</u>	<u>14</u>	<u>18</u>
CITY OF <u>Ann Arbor</u>	<u>[Signature]</u>	<u>Amanda Jones</u>	<u>4771 Independence Dr #274</u>	<u>48107</u>	<u>6</u>	<u>14</u>	<u>18</u>
CITY OF <u>Ann Arbor</u>	<u>[Signature]</u>	<u>Lawrence Sullivan</u>	<u>570 Birchcrest Ct</u>	<u>48106</u>	<u>6</u>	<u>14</u>	<u>18</u>
CITY OF <u>Ann Arbor</u>	<u>[Signature]</u>	<u>Rebecca Bassett</u>	<u>624 Essex Dr.</u>	<u>48107</u>	<u>6</u>	<u>14</u>	<u>18</u>
CITY OF Ann Arbor	[Signature]	[Name]	2013 P...	48106	6	14	18
CITY OF <u>Ann Arbor</u>	<u>[Signature]</u>	<u>Diana L...</u>	<u>475 ...</u>	<u>48106</u>	<u>6</u>	<u>14</u>	<u>18</u>

CERTIFICATE OF CIRCULATION

The undersigned circulator of the above petition asserts that he or she is 21 or older and a United States citizen; that each signature on the petition was signed in his or her presence; that he or she has neither raised nor permitted a person to sign the petition more than once and has no knowledge of a person signing the petition more than once; and that, to his or her best knowledge and belief, each signature is the genuine signature of the person purporting to sign the petition, the person signing the petition was at the time of signing a registered elector of the city or township indicated preceding the signature, and the elector was qualified to sign the petition.

If the circulator is not a resident of Michigan, the circulator shall make a cross or check mark in the box provided, otherwise each signature on this petition sheet is invalid and the signatures will not be counted by a filing official. By making a cross or check mark in the box provided, the undersigned circulator asserts that he or she is not a resident of Michigan and agrees to accept the jurisdiction of this state for the purpose of any legal proceeding or hearing that concerns a petition sheet executed by the circulator and agrees that legal process served on the Secretary of State or a designated agent of the Secretary of State has the same effect as if personally served on the circulator.

WARNING — A circulator knowingly making a false statement in the above certificate, or a person who signs a name other than his or her own as circulator, or a person not a circulator who signs as a circulator, or a person who signs a name other than his or her own as circulator is guilty of a misdemeanor.

Paid for with regulated funds by Promote the Vote, 2865 Woodward Ave., Detroit, MI 48202.

CIRCULATOR — Do not sign or date certificate until after circulating petition.
Sherwood Williams (Date) 08, 19, 2018
 Signature of Circulator
Danielle McCain (Printed Name of Circulator)
1000 Woodlawn Ct
 Complete Residence Address (Street City, Number or Rural Route) (Do Not Enter a Post Office Box)
Ann Arbor, MI 48106
 (City or Township, State, Zip Code)

(County of Registration: If Registered to Vote as a Circulator who is not a Resident of Michigan)

BOARD OF STATE CANVASSERS

In re Petition of Promote the Vote

AFFIDAVIT OF KENDAL TOMLINSON

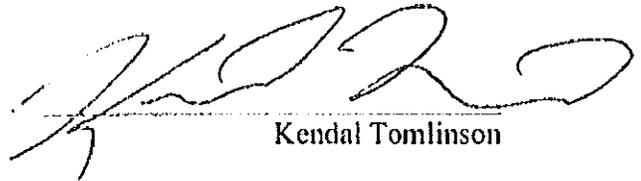
Kendal Tomlinson, being duly sworn, states as follows:

1. My name is Kendal Tomlinson. I am an adult resident of the State of Michigan and I am registered to vote in Michigan.

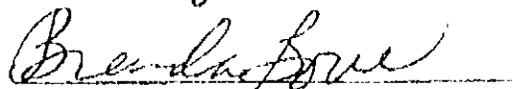
2. On June 18, 2018, I signed a petition to amend the Michigan Constitution. The proposal, if adopted, would provide citizens qualified to vote in Michigan with various rights related to voting and elections.

3. I have reviewed the attached petition, stamped 077071, and I hereby confirm that all my information is correct and that is my signature.

4. I have personal knowledge of these facts and, if called as a witness, can testify to them.


Kendal Tomlinson

Subscribed and sworn to before me on Aug. 21, 2018.


Notary Public, State of Michigan

BRENDA BOVE
NOTARY PUBLIC, STATE OF MI
COUNTY OF OAKLAND
MY COMMISSION EXPIRES Nov 3, 2020
ACTING IN COUNTY OF Wing

STATE OF MICHIGAN
BOARD OF STATE CANVASSERS

In re Petition of Promote the Vote

_____ /

AFFIDAVIT OF PETER TSANGARIS

Peter Tsangaris, being duly sworn, states as follows:

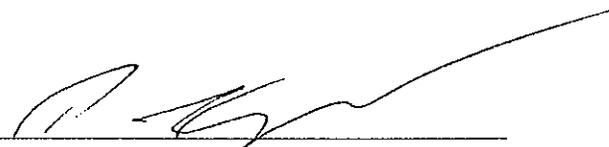
1. My name is Peter Tsangaris. I am an adult resident of the State of Michigan and I am registered to vote in Michigan.

2. On March 8, 2018 I signed a petition to amend the Michigan Constitution. The proposal, if adopted, would provide citizens qualified to vote in Michigan with various rights related to voting and elections.

3. I have reviewed the attached petition, stamped 017607, and I hereby confirm that all my information is correct and that is my signature.

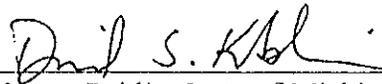
4. If there is any perceived discrepancy between my signature on the petition and a signature I've given previously it may be because I was rushing to sign the petition.

5. I have personal knowledge of these facts and, if called as a witness, can testify to them.

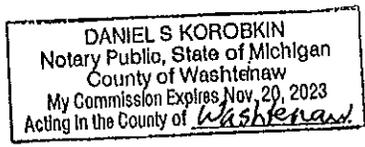


Peter Tsangaris

Subscribed and sworn to before me on August 21, 2018.



Notary Public, State of Michigan



STATE OF MICHIGAN
AMENDMENT TO THE CONSTITUTION

A proposal to amend the Michigan Constitution of 1963 by amending Article II, Section 4, if adopted the proposal would provide citizens qualified to vote in Michigan with the following rights: to vote a secret ballot; for military and overseas voters to be sent a ballot 45 days before an election; to vote straight party on all partisan general election ballots; to be automatically registered to vote when obtaining a driver's license or personal identification card from the Secretary of State, unless the person declines; to register to vote by mail on or before the 15th day before an election; to register to vote in person at any time with proof of residency; to vote an absentee ballot, by mail or in person, without giving a reason; and to have election results audited to ensure the accuracy of elections. This proposal is to be voted on at the November 6, 2018 general election.

The full text of the proposal appears on the reverse side of this petition along with the provisions of the existing constitution which would be altered or abrogated if the proposal is adopted. **017607**

We, the undersigned qualified and registered electors, residents in the county of Washington State of Michigan, respectively petition for amendment to constitution.

WARNING — A person who knowingly signs this petition more than once, signs a name other than his or her own, signs when not a qualified and registered elector, or sets opposite his or her signature on a petition, a date other than the actual date the signature was affixed, is violating the provisions of the Michigan election law.

INDICATE CITY OR TOWNSHIP IN WHICH REGISTERED TO VOTE	SIGNATURE	PRINTED NAME	STREET ADDRESS OR RURAL ROUTE	ZIP CODE	MO	DAY	YEAR
CITY OF <input checked="" type="checkbox"/> ANN ARBOR	<i>Amanda Hungerford</i>	Amanda Hungerford	1080 N. Maple Rd.	48103	3	3	18
TOWNSHIP OF <input type="checkbox"/> ANN ARBOR	<i>MVA</i>	Danielle Frank	516 N. 7th St.	48103	3	3	18
CITY OF <input type="checkbox"/> ANN ARBOR	<i>Robert Ziff</i>	Robert ZIFF	2540 Newport	48103	3	3	18
TOWNSHIP OF <input type="checkbox"/> ANN ARBOR	<i>Joanna Bailey</i>	Joanna Bailey	521 Chess	48103	3	3	18
CITY OF <input type="checkbox"/> ANN ARBOR	<i>Chanda Pini</i>	CHANDA PINI	1812 HAWCREST	48103	3	6	18
TOWNSHIP OF <input type="checkbox"/> ANN ARBOR	<i>Peter Tsangalis</i>	Peter Tsangalis	1800 Hickory Hill Rd	48105	3	5	18
CITY OF <input type="checkbox"/> ANN ARBOR	<i>Earned Judge</i>	EARNED JUDGE	442 VILLAGE GREEN BLVD #105	48105	3	17	18
TOWNSHIP OF <input type="checkbox"/> ANN ARBOR	<i>Linda Randolph</i>	Linda Randolph	719 Skynola Dr	48105	3	17	18
CITY OF <input type="checkbox"/> ANN ARBOR	<i>Shacie Pinton</i>	Shacie Pinton	3060 Barclay Woods	48105	3	17	18
TOWNSHIP OF <input type="checkbox"/> ANN ARBOR	<i>Jeff VanHallen</i>	JEFF VANHALLEN	3060 BARCLAY WA	48105	3	17	18

CIRCULATOR — Do not sign or date certificate until after circulating petition.

Susan M Marville
 (Printed Name of Circulator)
 9500 Scully Rd
 Complete Residence Address (Street and Number or Rural Route) [Do Not Enter a Post Office Box]
 Whiteoaks, MI 48187
 (City or Township, State, Zip Code)
 Washington
 (County of Registration, if Registered to Vote, of a Circulator who is not a Resident of Michigan)

The undersigned circulator of the above petition asserts that he or she is 18 years of age or older and a United States citizen; that each signature on the petition was signed in his or her presence; that he or she has neither caused nor permitted a person to sign the petition more than once and has no knowledge of a person signing the petition more than once; and that, to his or her best knowledge and belief, each signature is the genuine signature of the person purporting to sign the petition, the person signing the petition was at the time of signing a registered elector of the city or township indicated preceding the signature, and the elector was qualified to sign the petition.

If the circulator is not a resident of Michigan, the circulator shall make a press or check mark in the box provided adjacent to each signature on this petition. The undersigned circulator asserts that he or she is not a resident of Michigan and agrees to accept the jurisdiction of this state for the purpose of any legal proceeding or hearing that concerns a petition circulated by the circulator and agrees that legal process served on the Secretary of State or a designated agent of the Secretary of State has the same effect as if personally served on the circulator.

WARNING — A circulator knowingly making a false statement in the above certificate, a person not a circulator who signs as a circulator, or a person who signs a name other than his or her own as circulator is guilty of a misdemeanor.

Paid for with regulated funds by Promote the Vote, 2956 Woodward Ave., Detroit, MI 48201. MY003504

EXHIBIT G

Andrew Nickelhoff

From: Andrew Nickelhoff
Sent: Tuesday, August 21, 2018 5:04 PM
To: Williams, Sally (MDOS)
Cc: Melissa Malerman; Sharon Dolente
Subject: Promote the Vote petition review - LETTER ATTACHED
Attachments: PTV signature defense letter 2.8 21 18 FINAL WITH EXHS.pdf

SENT BY: ANDREW NICKELHOFF
SACHS WALDMAN
PROFESSIONAL CORPORATION

2211 E. Jefferson Ave. Ste. 200, Detroit, MI 48207 telephone: (313) 496-9429 fax: (313) 965-4602 www.sachswaldman.com

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THEODORE SACHS
1928-2001

ROLLAND R. O'HARE
1925-2017

BARRY P. WALDMAN
MARY ELLEN GUREWITZ
OF COUNSEL

GEORGE H. KRUSZEWSKI DEREK L. WATKINS
GEORGE T. FISHBACK JOSEPH R. PAWLICK*
JOHN R. RUNYAN, JR. AMY BACHELDER
ANDREW NICKELHOFF EDMOND PRIFTI
BRIAN A. MCKENNA* MAMI KATO
MARSHALL J. WIDICK
HOPE L. CALATI

*ALSO LICENSED IN ILLINOIS

August 21, 2018

via email and overnight mail

Sally Williams, Director of Elections
Michigan Bureau of Elections
1st Floor
430 W. Allegan St.
Lansing, MI 48918

re: Petition to Amend the Michigan Constitution filed by Promote the Vote

REQUEST FOR CERTIFICATION BASED ON FIRST SAMPLE

Dear Director Williams:

For the reasons discussed below and the evidence and documents attached to this letter, Promote the Vote requests that the Bureau of Elections promptly recommend that the Board of Canvassers certify the petitions filed on July 9, 2018, for placement on the ballot, based on the first sample released on August 8, 2018.

BACKGROUND

On February 9, 2018, Promote the Vote submitted its petition to the Bureau of Elections for approval by the Board of Canvassers as to form. The Canvassers approved the form of the petition at their meeting on February 13, 2018. (Exhibit 1) On July 9, 2018, Promote the Vote submitted its petitions to the Bureau of Elections. (Exhibit 2) On August 8, 2018, the Bureau released a first sample of 500 petition signatures in accordance with its two-step review procedure, and issued a challenge deadline of August 22, 2018. (Exhibit 3) On August 14,

Sally Williams, Director of Elections
Michigan Bureau of Elections
August 21, 2018
Page 2

2018, the Bureau issued a challenge deadline of August 28, 2018 for a second sample. (Exhibit 4) On the following day, Promote the Vote was emailed draft preliminary results of the Bureau's review of the first sample. (Exhibit 5) The email did not provide a count of sheets and signatures rejected in the Bureau's initial review. The Bureau has not issued an Interim Staff Report setting forth the results of its review of the first sample. Promote the Vote has requested but has not yet received the statistical reliability ranges used in the Bureau's review of the first sample.

BASIS AND SUPPORT FOR PROMOTE THE VOTE'S REQUEST

We understand that the Bureau plays an instrumental role in assisting the Board of Canvassers in performing its duty to determine whether a petition to place a proposed constitutional amendment on the ballot contains the required number of valid signatures. Section 31(2) of the Election Code, MCL 168.31(2), provides that the Secretary of State "*shall*" promulgate rules in accordance with the notice and hearing procedures of the Michigan Administrative Procedures Act to establish uniform standards for the Board's and Bureau's examination of ballot question petition signatures. Such rules may include standards for "[d]etermining the genuineness of the signature of a circulator or individual signing a petition, including digitized signatures." MCL 168.31(2)(b). The Secretary of State has not acted on the legislature's directive and no rules have been adopted to guide the review of petition signatures or to inform the public in proposing and submitting petitions.

In the absence of administrative rules, the Bureau has developed practices over the years in an effort to provide a degree of consistency. We appreciate the Bureau's issuance of guidance

Sally Williams, Director of Elections
Michigan Bureau of Elections
August 21, 2018
Page 3

to assist the public in complying with the complex rules and requirements for petition circulation and signatures, “Circulating and Canvassing Countywide Nominating and Qualifying Petition Forms” (March 2015). Those undertaking the formidable task of preparing, circulating and filing voter signatures for placement of a proposed constitutional amendment or other measures on the ballot have to depend on the Bureau’s published guidance, as well as on limited knowledge of the Bureau’s practices for processing petition signatures. Promote the Vote relied on the Bureau’s written guidance in obtaining petition signatures.

In an effort to aid the Bureau in its review and analysis of the first sample, Promote the Vote is submitting its response to the Bureau’s rejection of more than fifty signatures from the first sample. In addition to the points raised in this letter, we ask the Bureau to review Exhibit 6, Promote the Vote’s Signature Defense, and Exhibits 7 and 8 which incorporate sworn affidavits obtained from voters whose signatures were rejected as incomplete or illegible. We expect to be supplementing this submission with additional affidavits and signature defenses, as well as a response to any challenges filed tomorrow, within a very short time. Based on extrapolation from the statistical analyses applied to other constitutional amendment petitions filed this year, we believe that an additional twelve (12) valid signatures should be sufficient for the Bureau to recommend certification to the Board of Canvassers with sufficient confidence to obviate the need for analysis of a second sample. We believe that when the additional information and evidence is considered, the Bureau will conclude that a sufficient number of valid signatures have been submitted to justify reliance on the first sample.

Sally Williams, Director of Elections
Michigan Bureau of Elections
August 21, 2018
Page 4

The Signatures Marked as “Incomplete” Should Be Counted as Valid According to the Bureau’s Published Guidance

A total of twenty-four (24) signatures were preliminarily coded by the Bureau as an “incomplete signature” (“IN”). (Exhibit 5) The Bureau’s guidance memorandum provides the following examples of an incomplete signature: “Mrs. Smith, Mr. Smith, Jane John”. (p. 5) None of the signatures identified as “incomplete” resembles these examples. As set forth in Exhibit 6, Promote the Vote’s “Review of First Sample Results”, the twenty four signatures marked “IN” could qualify because: that qualify as “illegible” under the Bureau’s guidance, or they are printed, or they contain the signer’s first initial and last name. All of these are acceptable signature variation under the Bureau’s published guidance.¹

The Attached Affidavits Also Substantiate the Validity of “Incomplete” Signatures

Beyond the fact that the twenty-four signatures rejected as “IN” satisfy the published guidance as an acceptable signature, we have attached as Exhibit 8 the Affidavits of eight (8) of those signers who attest that the signatures on the petition are in fact their genuine signatures. (Exhibit 8) Every one of the signers contacted by Promote the Vote confirmed the authenticity of their signature and the accuracy of their petition entries. (Exhibit 7, Sharon Dolente Affidavit). Promote the Vote is continuing its efforts to obtain affidavits and expects to provide additional affidavit evidence to the Bureau on a daily basis.

¹ “Acceptable Signature Variations” on page 5 include: “signature appears as follows: J. Smith; J.B. Smith; Mrs. J. Brown; Mrs. J.B. Brown; Mrs. John Brown”; and “illegible signature”; and “signer prints name in entry provided for signature.”

Sally Williams, Director of Elections
Michigan Bureau of Elections
August 21, 2018
Page 5

Additional Defense of Signatures

Promote the Vote also submits the following defenses of additional signatures that were disqualified in the Bureau's preliminary first sample results. These are detailed in Exhibit 6. They include (but are not limited to) the following:

- Voters that Promote the Vote found as registered but the Bureau did not (e.g. Petition 6646, Line 10 and Petition 32795, Line 4);
- Voters registered in the city or township provided (e.g. Petition 32444, Line 4 and Petition 9040, Line 4);
- Voters who signed and dated the petition properly (e.g. Petition 44090, Line 5 and Petition 51223, Line 2); and
- Voters who put their full mailing address, including city and township, in the address box and thus have provided all the necessary and required information to verify the voter (e.g. Petition 717, Line 2 and Petition 90015, Line 1).

We would welcome the opportunity to discuss each of these additional signature defenses with the Bureau.

Highly Subjective Signature Comparison Should Not Disqualify Valid Voter Signatures

Section 476(1), MCL 168.476(1), provides that when the authenticity of a petition signature cannot be verified using the digitized signatures in the QVF, the signature should be checked against local clerks' registration records. We do not know whether the Bureau went beyond the digitized signature in the QVF for the purpose of evaluating petition signatures. To

Sally Williams, Director of Elections
Michigan Bureau of Elections
August 21, 2018
Page 6

the extent that the Bureau invalidated signatures as “Incomplete” because they did not match the QVF digitized signature or another signature on file, or because they were deemed insufficiently legible to make a comparison, the signatures should not have been disqualified without further investigation.²

The Bureau’s determination of similarity to the QVF signature is necessarily subjective because, as courts have recognized, a person’s petition signature given hurriedly on a clipboard may be quite different from the same person’s signature on a driver’s license or voter registration application or other legal document. In addition, a person’s signature may vary greatly over time and under different circumstances depending on age, health, native language, and many other factors. See Exh. 9, Declaration of Dr. Linton Mohammed filed in *Saucedo v Gardner*, 2018 U.S. Dist. LEXIS 136895 (D. N. H. August 14, 2018)(District Court decision holding absentee voter signature matching to be unconstitutional attached as Exhibit 10).³

The Michigan Court of Appeals acknowledged the unreliability of signature comparisons in *Jaffe v Oakland Co Clerk*, 87 Mich App 281, 285 (1978):

It has long been recognized that handwriting similarity is so much a matter of opinion and so indefinite that generally it may not be acted upon in canvassing

² Neither applicable statutory petition form, MCL 168.544c, 168.544d, nor the Bureau’s guidance on petition format, requires written notice to a signer that their signature must conform to the digitized signature on file with the Secretary of State.

³ In addition, many peoples’ signatures have changed drastically in recent years with the advent of new transactional technology. The proliferation of electronic and credit card transactions and the increasingly widespread use of touchpads for taking signatures has, for many, transformed carefully penned signatures to hurriedly drawn scrawls that are barely discernable as writing.

Sally Williams, Director of Elections
Michigan Bureau of Elections
August 21, 2018
Page 7

petitions. *Thompson v Secretary of State*, 192 Mich 512, 527 (1916). Thus, signatures appearing on petitions filed with the Secretary of State for initiative and referendum are presumed valid, and the burden is on the protestant to establish their invalidity by clear, convincing and competent evidence. In *Karwick v Grajewski*, 253 Mich 110 (1931), a case involving the sufficiency of signatures to petitions for the recall of the mayor of Hamtramck, the Court held that the city clerk was not to act as a handwriting expert. It is common knowledge that signatures change with age or illness. Penmanship when first registering is often different from a signature in later life. Handwriting hastily affixed to a petition at a shopping center or while standing on a street corner differs materially from handwriting leisurely affixed sitting at a desk.

For more than seventy years, going back to the Michigan Supreme Court's decision in *Michigan State Dental Society v Sec'y of State*, 294 Mich 503, 513-514 (1940), it has been clear that a signature must be understood as capable of significant variation. Like everyone else, a petition signer does not have one signature, including his or her digitized signature in the QVF.

The subjectivity involved in determining whether the signature is a match and the natural variation in a person's signature over time and under different circumstances strongly suggest that the comparison of signatures should not be a deciding factor in acceptance or rejection of a petition signature – particularly where the Bureau's guidance states that illegibility is not a basis for disqualification.

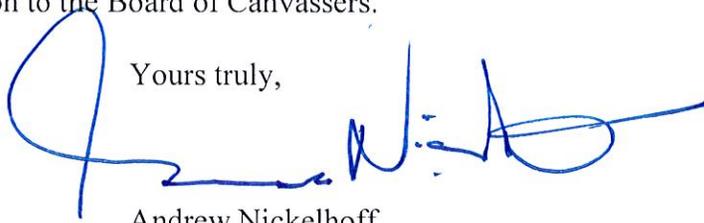
CONCLUSION AND REQUESTED ACTION

Our understanding of the Bureau's practice is that if the two-stage sampling procedure is selected, the Bureau solicits input from the proponent and challengers and issues a staff report detailing its conclusions regarding the first sample, before a decision is made to draw a second sample. For example, in the case of "Protecting Michigan Taxpayers", the Bureau issued an

Sally Williams, Director of Elections
Michigan Bureau of Elections
August 21, 2018
Page 8

Interim Staff Report recommending that a second sample be drawn only after accepting and reviewing changes suggested by the proponent and the challenger. (“Interim Staff Report – Protecting Michigan Taxpayers” January 26, 2018). We understand that the Bureau proceeded with a second sample for Promote the Vote without following the normal procedure, we assume due to the exigent conditions and compressed timetable. However, we urge the Bureau to accord Promote the Vote and its supporters the same opportunity as other proponents to have their response to the Bureau’s first sample review thoroughly considered. We request that if, after this submission and input from interested parties, the Bureau concludes that the result from the first sample supports a sufficient level of confidence, the Bureau discontinue analysis of the second sample and recommend certification to the Board of Canvassers.

Yours truly,



Andrew Nickelhoff
SACHS WALDMAN P.C.
Attorneys for Promote the Vote

AN/plm
opeiu42afl-cio
Enclosures
cc: Melissa Malerman
Sharon Dolente

EXHIBIT H

Andrew Nickelhoff

From: Andrew Nickelhoff
Sent: Wednesday, August 22, 2018 1:49 PM
To: 'Williams, Sally (MDOS)'
Cc: Melissa Malerman; Sharon Dolente
Subject: Promote the Vote petition review - LETTER AND ADDITIONAL AFFIDAVITS ATTACHED
Attachments: Supplemental Affid filing.8.22.18.pdf

SENT BY: ANDREW NICKELHOFF
SACHS WALDMAN
PROFESSIONAL CORPORATION

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1925-2017

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GEORGE T. FISHBACK JOSEPH R. PAWLICK*
JOHN R. RUNYAN, JR. AMY BACHELDER
ANDREW NICKELHOFF EDMOND PRIFTI
BRIAN A. MCKENNA* MAMI KATO
MARSHALL J. WIDICK
HOPE L. CALATI

*ALSO LICENSED IN ILLINOIS

August 22, 2018

via email and overnight mail

Sally Williams, Director of Elections
Michigan Bureau of Elections
1st Floor
430 W. Allegan St.
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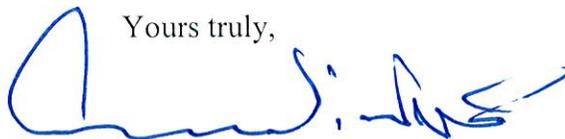
re: Petition to Amend the Michigan Constitution filed by Promote the Vote

SUPPLEMENTAL AFFIDAVITS IN SUPPORT OF
REQUEST FOR CERTIFICATION BASED ON FIRST SAMPLE

Dear Director Williams:

Attached hereto for the Bureau's review are five (5) additional voter affidavits (Michael Celsi, Kimberly Chamberlain, Dwanna Joseph, Kendal Tomlinson, Peter Tsangaris) supplementing the seven (7) affidavits filed with my letter yesterday. We intend to file additional affidavits soon. While we have not been provided Bureau's statistical probability matrix for the first sample, we believe based on our estimate that the thirteen (13) affidavits filed thus far, together with the signature defenses in Exhibit 6 of our submission yesterday, are more than sufficient to support a recommendation to certify the petition.

Yours truly,



Andrew Nickelhoff
SACHS WALDMAN P.C.
Attorneys for Promote the Vote

AN/plm
opeiu42afl-cio
Enclosures
cc: Melissa Malerman
 Sharon Dolente

EXHIBIT I

STATE OF MICHIGAN
BOARD OF STATE CANVASSERS

In re Petition of Promote the Vote

AFFIDAVIT OF SHARON DOLENTE

Sharon Dolente, being duly sworn, states as follows:

1. My name is Sharon Dolente. I am the Voting Rights Strategist at the American Civil Liberties Union of Michigan.
2. I am leading a team of individuals investigating the twenty-four “incomplete signatures” identified by the Michigan Bureau of Elections in their preliminary results of the Promote the Vote small signature sample.
3. The investigation entails attempting to locate each petition signer whose signature has been labeled incomplete, showing them a copy of the petition sheet on which their signature is affixed and asking if it is in fact their signature.
4. Thus far, the investigative team has had contact with ten of the twenty-four petition signers whose signatures were labeled incomplete.
5. When presented with a copy of the petition on which their signature is affixed, **all ten of the petition signers immediately and without hesitation confirmed that the signature on the petition was in fact theirs.**
6. To date, our team has obtained seven signed, sworn affidavits from petition signers confirming that the signatures deemed “incomplete” by the Bureau are in fact their signatures.

7. In some cases, the affiants have explained that their petition signatures may look different from their signatures elsewhere due to the circumstances unique to petition signing (for example, it was signed on a clipboard, in a rush, on a street corner, etc.).

8. The investigative team continues to schedule appointments with the additional petition signers with whom we have had contact to obtain their affidavits and it is expected that three additional affidavits will be sworn in the next 24 hours.

9. The investigative team continues to try to track down any petition signers with whom we have not yet made contact.

10. I have personal knowledge of these facts and, if called as a witness, can testify to them.


Sharon Dolente

Subscribed and sworn to before me on August 21, 2018.


Notary Public, State of Michigan

DANIEL S KOROBKIN
Notary Public, State of Michigan
County of Washtenaw
My Commission Expires Nov. 20, 2023
Acting in the County of Wayne