



Graves Garrett LLC

Edward D. Greim
816.256.4144 phone
816.817.0864 fax
edgreim@gravesgarrett.com

April 18, 2022

Via Electronic Mail

The Honorable Alvin Jaeger
Secretary of State
600 East Boulevard Avenue Dept 108
Bismarck, ND 58505-0500
ajaeger@nd.gov

Re: Cure of Term Limits Petitions

Dear Secretary Jaeger:

This is our second letter on behalf of our client, North Dakota for Term Limits (“NDTL”) in response to certain issues raised by your office on NDTL’s initiative petitions.¹ As you know, NDTL’s proposal would add a new article to the North Dakota Constitution imposing term limits for the Governor and members of the Legislature. The points raised below supplement the arguments raised in our letter dated April 11, 2022 (“April 11th Letter”),² and raise additional issues pertaining to the disqualification of signatures based on unsupported allegations of pay per signature violations and alleged yet insubstantial defects in the way some electors wrote their signatures and addresses.

¹ Your office confirmed that because the 20-day cure period would end on Sunday, April 17, 2022 (if it started on Monday, March 28, 2022, when you first began to disclose materials to us) and your office was closed on April 15, 2022 in observance of the holiday, our 20-day cure period would end on Monday, April 18, 2022.

² The April 11th Letter addressed two major issues we identified including signatures being unconstitutionally and unlawfully stricken on the basis that they were gathered before the approval date, and the unconstitutional and improper wholesale disqualification of signatures notarized by Zeph Toe for “likely forgery.”



Before turning to those points, we pause to raise a procedural objection. In accordance with the North Dakota Constitution, for the last 20 days the Committee has been reviewing the petitions to correct or amend any mistakes or omissions alleged by your office at the expiration of its 35-day review period. N.D. Const. art. III, § 6. In order to undertake that review, it was necessary to understand the complete legal and factual basis for your determination as to each signature, especially those signatures which you claim should be invalidated. That is because your office undertook a signature-by-signature review against the VOICES database and, it appears, a Department of Transportation database, and turned to the Bureau of Criminal Investigation in an attempt to interview most of the petition circulators and workers.³

Because of your decision to mount a signature-by-signature challenge, the Committee has asked not only for the petitions on which your review team marked the bases for its challenges, but for all summaries and other documents that you relied upon to make your determination. We have been unsuccessful in receiving these items from you. The Committee received a portion of the petitions for review when they first became available on March 28, 2022, and supplemental portions on April 7 and April 11 after our reviewers determined that petitions were missing from your earlier productions. Although your own investigation and review necessarily closed after the expiration of the 35-day period, the factual and legal bases for your challenges are still unclear to us.⁴ This submission, therefore, is limited to what you were able or willing to disclose to us while our 20-day period was running. We reserve the right to raise other challenges in the appropriate forum as we learn more about your investigation and decision.

³ As noted in our first letter, both of these decisions were sharp departures not only from your regular practice, but also from the sampling procedure required by North Dakota initiative statutes. We reserve all of our rights and remedies regarding these decisions, and continue to ask that you preserve all records and communications regarding your review and investigation.

⁴ To note just one example from our last letter, your detailed summary of the basis for signature exclusions lists over 8,000 signatures as having been excluded because the petitions were allegedly signed too early—before July 16, 2021. But we have confirmed that all but two signatures were signed weeks or months after that date, and the two signatures dated “June 25” appear on a page of “July 25” signatures, suggesting signer error. If there is some other reason for excluding all of these signatures, or if your claim was in error, your office did not notify us, either during the review process or by the 35-day constitutional deadline.



Regardless, it is clear that the term limits measure easily qualified for the November ballot. For the reasons stated below, the Committee submitted a sufficient number of signatures, and you should reverse your decision.

A. Wholesale disqualification of signatures notarized by Zeph Toe for “likely forgery” based on an inexpert opinion regarding a few circulator signatures was unconstitutional and improper.

As stated in our April 11th Letter, 751 petitions containing 15,740 signatures were disqualified based on an inexpert guess that two circulator signatures—covering a miniscule fraction of the affected elector signatures—were signed by someone other than the named circulator, and that this happened in the presence of the notary, Zeph Toe. According to the logic of your office, this invalidates every valid elector signature gathered by every circulator who ultimately appeared before Mr. Toe for notarization. Our April 11th Letter stated the reasons that the wholesale exclusion of these valid signatures of term limits supporters was improper, even if your office had guessed correctly that someone else signed these two circulators’ names on the affidavit on three or four of the petition pages. It also included an affidavit from Zeph Toe reaffirming that he confirmed the identity of each circulator consistent with North Dakota law, and that neither he nor anyone else added to the petitions after he notarized the circulators’ signatures. We now supplement that argument and proof with an additional factual showing.⁵

Utilizing Mr. Toe’s notary log, we were able to identify thirty five of the thirty-six petitions circulated by Ms. Lloyd and notarized by Mr. Toe. Ms. Lloyd has provided an affidavit reaffirming that the handwriting and signatures contained in the thirty-five petitions was performed by her in the presence of Mr. Toe. Ex. A, ¶ 9-10. Ms. Lloyd reviewed each petition signature sheet and confirmed that although the city, state, and zip code appears different from the street address, the handwriting was hers and that she made no alterations to the document after the notarization. Ex. A, ¶ 10-11. As she attests

⁵ Your office was unable to provide any specific information identifying the circulator packets containing the allegedly forged circulator signatures. According to notes written or typed by someone in your office that we found in a packet, the allegations seem to stem from signatures by circulators Chloe Lloyd and Ramona Morris.



and the logs show, Ms. Lloyd did personally appear before Mr. Toe to complete the required circulator affidavit and has no reason to believe that any person forged her name or made alterations to her address. Ex. A, ¶ 12. Mr. Toe's affidavit also makes clear that it was Ms. Lloyd who appeared before him and signed her name each time, and that he made no alteration to the notarization page after she made her oath and signed.

Based on our review with Mr. Toe and Ms. Lloyd, as well as our review of the few signatures identified by your office, there does not appear to be any legitimate basis for your assertion that any circulator signatures were "likely forged," or that Mr. Toe's conduct was anything other than lawful.

B. No signatures should be stricken based on a statutory ban on paying circulators based on the number of signatures gathered.

Your office appears to have stricken an unknown number of signatures due to allegations that some circulators were paid "bonuses", which we interpret to allege a violation of the North Dakota pay per signature ban. N.D.C.C. 16.1-01-12(1)(j). This claim fails both on the facts and the law.

First, NDTL's main signature-gathering firm, Advance Micro-Targeting ("AMT"), is a veteran of numerous North Dakota campaigns. Ex. B, ¶3. AMT was hired for precisely that reason. It generally does not pay its circulators by the signature, either in North Dakota or in any other state, making its business model unique in the petition-circulating world. Ex. B, ¶4. AMT fully cooperated with the unprecedented investigation to which the term limits petition was subjected, going so far as to provide pay records for all of its circulators to your office. See Ex. B, ¶8; see also Ex. A to Ex. B. Those records made clear that circulators were paid exclusively based on the number of hours worked. Ex. B, ¶¶6-7; see also Ex. A to Ex. B. They were paid time-and-a-half for extra time worked, not for extra signatures gathered. *Id.* While every AMT circulator received a uniform "bonus" of \$50 because one paycheck, company-wide, was released almost a day late, Ex. B, ¶11, it is clear that no AMT circulator was paid based on the number of signatures gathered.

We are aware from documents produced by the Secretary that three AMT circulators suggested to a BCI investigator that they were offered a "bonus". We do not



know—and the Secretary’s office may not even know—what question was actually asked of each circulator or what words were used to answer the question. Our request for all information the Secretary relied upon in making the decision—including any statements or other records—went unanswered and unacknowledged. Standing alone, the short note we found in the Secretary’s file is unclear; it certainly does not clearly state that the circulator was paid based on the number of signatures collected. It is difficult to understand or credit a statement that involves at least one level of hearsay. All of this aside, it is simply untrue that any AMT circulator was paid, bonused, or incentivized in any way based on the number of signatures collected. Ex. B, ¶¶8-9. For the Secretary to definitively conclude otherwise, even for a few AMT circulators, is a grievous error based on a grossly inadequate investigation.

With respect to non-AMT circulators, you allege that Logan Jaworski stated that Charles Tuttle and Jessica Jaworski were paid money to collect between 5,000 and 7,000 signatures. This allegation alone is not evidence of any wrongdoing. Even if a petition company was hired with some expectation that they would collect a certain number of signatures, such an arrangement would not violate the North Dakota pay per signature ban. The industry could not operate if the sponsoring committee was banned from communicating some information to the signature gathering firm as to the number of signatures needed. For the sponsor, communicating a goal or expectation helps it to decide whether to hire even more circulators, when turn-in could be achieved, and to divide the work among different groups of circulators. Similarly, the people or entities coordinating the signature gathering must know what is expected of them, how much labor may be required, and when they should end their efforts. The law does not, and cannot, impose liability simply for communicating a goal to be collected, particularly when the amount paid to the circulators is not based on the number of signatures gathered and is independent of the goal itself.

The materials provided to the Committee also baldly assert that two circulators were “offered bonus[es]”, thereby invalidating not only the signatures collected by those two circulators, but also all of the signatures gathered by Charles Tuttle and Jessica Jaworski “because they offered the bonuses.” The documents provided to the Committee lack any basis for the Committee to understand what the alleged “bonuses” were or, if



the “bonuses” were paid, whether they violated the pay per signature ban. Additionally, three of the circulators listed under the Tuttle group (Carrie Lusby, Tara Whitworth, and Sheena Mittleider) lack any allegations that they were offered or paid a bonus, yet it appears that they were thrown out simply by association with Charles Tuttle.

It is a grave act to strike a North Dakota elector’s willing, knowing signature imploring the state to place an initiative on the ballot. It invalidates a citizen’s exercise of a right guaranteed by the North Dakota Constitution and protected in many respects by the First Amendment. That act takes on a deeper gravity when the signature is otherwise valid and the alleged error is not that of the petitioning elector. Here, the Secretary’s office seems to have taken this grave act thousands of times, grasping at uncertain evidence and hearsay that went largely undisclosed within the 35-day decision period and even within the 20-day cure period, despite several requests. In crediting vague and hearsay statements, it does not appear the Secretary applied even a preponderance of evidence standard before striking North Dakota electors’ signatures. These invalidations—whatever their true number—are simply factually unsupportable.

Factual issues aside, North Dakota’s ban on paying circulators based on the number of signatures gathered is only statutory. The North Dakota Constitution does not require it, and indeed, the North Dakota Constitution only allows statutes that help—rather than hinder—the initiative process. The North Dakota Supreme Court has stated that any statutory burdens placed on the right to initiative that exceed what is required by the state constitution must be for the purpose of “facilitating the exercise of the rights reserved to the people, and such requirements may not hamper the rights so reserved.” *Hernett v. Meier*, 173 N.W.2d 907, 913 (N.D. 1970). On its face and as it was applied here, the pay-per-signature ban violates both the North Dakota Constitution, as it was used to disenfranchise thousands of North Dakotans based on tenuous allegations of “bonuses” being paid, and the First Amendment and Due Process Clause of the United States Constitution.⁶ It serves only as a tool to hobble politically controversial initiative campaigns and is not narrowly tailored to advance a compelling state interest.

⁶ See *Meyer v. Grant*, 486 U.S. 414, 421–23 (1988) (holding that the circulation of an initiative petition is “core political speech” and striking down prohibition on paying petition circulators). We are aware that North Dakota’s pay per signature ban was challenged in *Initiative & Referendum Inst. v. Jaeger*,



The burden this statute imposes on sponsors is severe. If the mere discussion between a sponsor and a petition company of an overall numerical goal is forbidden, it makes organization of a campaign effectively impossible. Both sponsors and circulation teams need to know how many advocates to hire, whether additional teams need to be recruited, when the work can be completed, and when they can stop circulating petitions. All of these burdens exist on top of the primary problem with per-signature bans: it means that sponsors are prohibited from rewarding their most effective advocates.

This severe burden is not the result of narrow tailoring to meet a compelling state interest. States most commonly justify petition regulations as necessary to keep overzealous circulators from manufacturing false elector signatures. And cries of “signature fraud” (usually unsubstantiated) are common in petition campaigns. But here, not a single allegation of such fraud was made during the long months while sponsors gathered over 46,000 signatures from supportive North Dakota electors. And there are not allegations here that the rate of petition signing mistakes from the Tuttle team were any greater than those circulators whom you have *not* accused of pay per signature violations. Thus, in this campaign, the “pay-per-signature” ban played no role in advancing any legitimate state interest in combating fraud. It was only an after-the-fact excuse to strike signatures of willing North Dakota electors. The decision striking signatures solely because of allegations that “bonuses” were offered should be reversed.

C. The disqualification of signatures based on printed names and signatures being “inadequate” violates North Dakota’s rule of substantial compliance and is unconstitutional and improper.

Your office disqualified 2,273 signatures on the basis that they were “inadequate.” Your office provided a spreadsheet and key to assist the Committee in determining why the signatures were considered inadequate. It included issues such as no first name listed, no last name listed, name not printed, and signature not included. The North Dakota Constitution states that “each elector signing a petition shall also write in the date of

241 F.3d 614 (8th Cir. 2001). However, the Court upheld the ban primarily due to failure of proof by the plaintiff in that case. *See Id.* at 618. Additionally, that plaintiff failed to raise a challenge that the pay per signature ban violates the North Dakota Constitution. The Committee’s constitutional challenges are not foreclosed or resolved by that decision.



signing and his post-office address.” ND Const. Art 3, § 3. North Dakota statute adds an additional requirement that “...each signer shall also legibly print the signer’s name, complete residential address or rural route or general delivery address and the date of signing on the petition.” N.D.C.C. 16.1-01-09(2).

The Committee’s ongoing review of signatures disqualified as “inadequate” reveals that most of these signatures were improperly disqualified. The constitution only requires the elector’s signature, the date of signing, and the elector’s post-office address. ND Const. Art 3, § 3. Statutory requirements on the initiative process not found in the North Dakota Constitution can only withstand constitutional muster if they exist to “facilitate[e] the exercise of the rights reserved to the people, and such requirements may not hamper the rights so reserved.” *Hernett*, 173 N.W.2d at 913. Information required in excess of what is stated by the constitution must be for the “sole purpose” of enabling the Secretary of State to confirm whether the signer was a North Dakota elector. *Id.* All doubt as to the construction of applicable provisions pertaining to the rights so reserved to the people must be resolved in favor of upholding those rights, *Id.* at 912, and the North Dakota Supreme Court has required only “substantial compliance”, rather than strict technical compliance, with the constitutional requirements for elector information. *McCarney v. Meier*, 286 N.W.2d 780, 786 (N.D. 1979).

Contrary to this controlling authority, our review reveals that signatures were disqualified under a standard of strict technical compliance with the statute. This includes names being written so that they are not in complete “print,” careless handwriting, and signatures either being illegible or including initials. Yet despite these signers’ deviation from the strict compliance that might be expected in a fifth-grade classroom, your workers had no difficulty confirming who they were. Using their access to the VOICES and other databases, they could and did actually pull up the voters’ information, clarifying any uncertainty arising from the use of an initial or a scribbled letter in a name. Using the VOICES list, our own workers have found that several of your strikes were improper and should be restored to the petition under North Dakota’s “substantial compliance” standard. Exhibit C includes several examples of signatures that were excluded for having handwriting that may have been sloppy but would not prevent your office from substantiating that the signer was in fact a North Dakota elector.



Your office's abrupt adoption of a "strict compliance" standard for the term limits petition had its own internal problems. Some workers apparently rebelled or were unclear about exactly what passed muster. Your review was inconsistent from packet to packet, resulting in discrepancies in what constituted a valid printed name and signature and what would result in an elector's signature being disqualified. Exhibit D includes examples of these inconsistencies. For example, on petition 1265, line 2 and petition 1247, line 27, you permitted signers to use initials in a printed name and a signature, respectively. Yet on petition 1354, lines 18 and 28, you excluded signatures because they used initials. It bears repeating that striking a North Dakota elector's knowing, willing signature in support of a constitutional measure is a grave act. An elector's constitutional right to sign an initiative petition should not rise or fall based on which office worker happened to review their particular petition.

We have determined that a significant number of signatures were improperly disqualified on these bases. See Ex. E. As shown in the "Signature Validation" spreadsheet, our reviewers were able to verify names by simply searching for the name or address in the VOICES database, the central voter file maintained and used by your office in its own signature-by-signature review of the petition. Other elector information could be found via a simple Internet search, as shown by the dozens of screenshots included as part of Exhibit E. The alleged omissions, mistakes, or poor handwriting which you claim are the basis for excluding this sampling of signatures did not prevent our own reviewers from confirming whether or not a signer was a North Dakota elector. It is unconscionable that voters who could be so easily found were stricken from the petition in such numbers. They should be restored.

In conclusion, based on our review of the disqualified signatures on this basis, these unconstitutionally-stricken signatures which substantially, if not technically, complied with the statute should be returned to the petition.

D. Your office disqualified several signatures by improperly stating that the signer failed to include city, state, or zip when one or more of those were included.

Your office disqualified 610 signatures on the basis that the elector failed to include a city or zip code, or that the signer was from out of state. The Committee does not



challenge the disqualification of out of state signers, as those individuals were not electors of the State of North Dakota. However, those only account for some of the signatures disqualified on this basis.

It is improper for your office to disqualify signatures that include enough identifying information to determine whether the signer is an elector of North Dakota but have simply included the information in the wrong area on the sheet. Again, North Dakota requires only substantial compliance. *McCarney*, 286 N.W.2d at 786. The North Dakota Supreme Court has previously stated that if there is “attempted compliance” with the constitutional provision that the electors provide their post-office address, that attempt meets the state’s “substantial compliance” standard. *Thompson v. Jaeger*, 788 N.W.2d 586, 592 (N.D. 2010) (citing *McCarney*, 286 N.W.2d at 785-87). Furthermore, the Constitution’s requirement for electors to include a post-office address “was not to make the signature more valid, but to aid the secretary of state in contacting the signer to determine whether he or she was a qualified elector and did, in fact, sign the petition.” *McCarney*, 286 N.W.2d at 786. Therefore, the exclusion of signatures based on the city, state, or zip either being improperly placed on the petition, or including minor errors that would not hinder your office from contacting or verifying that the signer was an elector and did, in fact, sign the petition, is improper and unconstitutional.

Our reviewers were able to verify names and addresses using the information provided, including the signer’s name and residential address without a city, state, or zip, or with the signer’s name, residential address, and any one of those identifiers. Exhibit F includes a sample of signatures which you invalidated but were easily corroborated by our reviewers. Additionally, there were several instances where your office was able to verify an address when a zip code or other information provided was incorrect; however, you still chose to invalidate the signature even though the mistake did not prevent you from confirming the correct address. Exhibit G (petition 275, line 1) is just one example of the many times your office either corrected an address or verified an address because of the attempted, substantial compliance, yet still decided to invalidate the signature in violation of North Dakota precedent. Thus, with the information provided, your office could have determined, and in some cases apparently



did determine, that these individuals were electors of North Dakota and that there was no evidence of fraud based on misplacing or miswriting the city, state, or zip.

In conclusion, based on our review of the signatures disqualified on this basis, the unconstitutionally-stricken signatures should be returned to the petition.

E. Your office improperly disqualified a substantial number of signatures based on the signer's failure to include immaterial information within their address.

Your office disqualified 1,654 signatures based on the signers having blank addresses. In the documentation provided by your office, including the spreadsheet with the rejected signature key, these addresses not only included situations where an elector completely failed to include any address at all, but also included situations where an elector failed to signify a street direction, street number, house number, or failed to include "street, drive, avenue, etc."

Previously, the North Dakota Supreme Court held that substantial compliance with the statute is all that is required so long as the Secretary of State has the information he needs to determine if a signer is an elector. *McCarney*, 286 N.W.2d at 785-87. The constitution's requirement for electors to include a post-office address "was not to make the signature more valid, but to aid the secretary of state in contacting the signer to determine whether he or she was a qualified elector and did, in fact, sign the petition." *Id.* at 786. Using the VOICES database in a signature-by-signature comparison (which your office completed), it is easy to locate voters who happen to leave off a street direction, a house number, or the designation "St.," "Ave.," etc. There is no doubt who these voters are, as they provided sufficient information to substantially comply with the law. Exhibit H includes various examples where a signer omitted a directional or suffix. That omission alone is an insufficient reason to invalidate a signature where the signer's residency can be confirmed notwithstanding the omission. Given your access to various databases to confirm these signers' addresses and under the precedent in *McCarney*, the disqualification of addresses that match to a voter and are merely missing a street direction, apartment number, or "street, drive, avenue, etc," is improper and unconstitutional.



Significantly, at no time during the 35-day period did your office claim it could not find the voters, that their addresses were materially incorrect, that these signers were not electors of North Dakota, or that the signers themselves were somehow engaging in fraud. Instead, it is beyond obvious that electors do not always write the full, correct, official record of their address. This is the only flaw, and it is only fatal to a constitutional right in those rare cases where strict compliance with formalities is required. This is not such a case.

Finally, it must be noted again that your office was inconsistent in their review of this issue. Some addresses omitting a "S." from "S. Main" were counted as valid while others were stricken. As seen in Exhibit I when comparing lines 29 and 40, both of which omitted a directional, line 29 was invalidated on that basis while line 40 was not. That some workers rightly rebelled against the sudden, one-off application of the strict compliance standard is only further evidence that strict "address" compliance is unnecessary to protecting the constitutional initiative right. But more fundamentally, the rights of electors, which have been reserved to the people through the Constitution, should not hinge on which state employee happens to pick up his or her petition.

Your office invalidated a substantial number of signatures for the signer's failure to include a direction or the designation of street, avenue, or drive. Because disqualification on this basis is improper and is in direct conflict with North Dakota precedent, your office must accept the improperly disqualified signatures.

F. Your office's invalidation of signatures based on partial residence hall addresses is unconstitutional and unlawful.

Your office invalidated 74 signatures because the individual signing included their residence hall or residence hall address as their street address, effectively disenfranchising dozens of college students whose residence could have been easily verified. To be considered a qualified elector in North Dakota, an individual must be a citizen of the United States; eighteen years or older; and a resident of this state for thirty days. See N.D.C.C. § 16.1-01-04. As previously stated, North Dakota applies a substantial compliance standard, which is satisfied if a signer includes a complete residential address or rural route or general delivery address. See N.D.C.C. 16.1-01-09(2).



College students who have elected to reside on campus in North Dakota should not be denied the constitutional right to sign an initiative petition as an elector if they meet the qualifications necessary of electors. Your office has disqualified these electors' signatures for the failure to include a complete address where many of the students left out their dorm room numbers and either included a residence hall name or general address for the residence hall. However, on information and belief, your office has not attempted to verify that these addresses were incorrect or invalid. Once again, North Dakota only requires substantial compliance, and the constitutional requirement that a post-office address be listed is only for your office's benefit to verify the elector, not to wholesale disqualify signatures of individuals who have made a good faith attempt at compliance. See *McCarney*, 286 N.W.2d at 785-87.

For example, North Dakota State University has confirmed via phone that a student's name and residence hall or general address for the dorm is sufficient and that the absence of a dorm room number should not prevent students from receiving mail. The residence halls included on the petitions each have a website that lists the hall's mailing address, providing an easy resource by which you could have ascertained the street address merely by using the name of the residence hall as a reference. See Ex. J (sample of residence hall information for North Dakota State University and University of North Dakota). According to the North Dakota VOICES list, college students have been permitted to vote in previous North Dakota elections using only their room number and/or hall name as their street address, see Exhibit K, yet they are now being held to a higher standard to sign an initiative petition than they are to vote. You also provide instructions online for how a student can become eligible to vote in their college town within North Dakota, which presumably includes the same students that live in the residence halls which you now attempt to exclude. See Ex. L.

Once again, the new "strict compliance" test acts to frustrate the constitutional rights of willing North Dakota electors. Your office should repudiate that test and restore these students' signatures to the petition.



Graves Garrett LLC

North Dakota for Term Limits

April 18, 2022

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CONCLUSION

This initiative should be submitted to the people of North Dakota.

Your office originally accepted 17,265 of the 46,366 signatures submitted by the Committee. Just by correcting the two most glaring issues with your office's exclusion of signatures – the approval date issue and the Zeph Toe issue – the Committee has submitted more than 31,164 signatures.

Beyond those two issues, there are also over 6,000 signatures which you call into question for involving “bonuses” without any factual bases for those assertions. It is unclear how many signatures or which specific signatures were excluded on this basis, but we expect that a substantial portion of any that were excluded should rightfully be counted in favor of the initiative. You have also rejected valid signatures for failure to technically comply with your standards for addresses and signatures, despite the fact that the signers substantially complied in a manner that enables you to verify if they are indeed North Dakota electors.

The valid signatures of the electors who expressed support for the term limits initiative must be counted. We implore you to reconsider your position in accordance with the information provided above. The Committee reserves and does not waive its rights and remedies against you or any other party relating to the Petitions.

Respectfully,

Edward D. Greim

cc: Jim Silrum, Jared Hendrix, Jesse Walstad