

**State of Michigan  
Court of Appeals**

Committee to Ban Fracking in Michigan  
and LuAnne Kozma,  
Plaintiffs-Appellants

v

Christopher Thomas, Director of Elections;  
Ruth Johnson, Secretary of State; and  
Board of State Canvassers,  
Defendants-Appellees

Court of Claims Case # 16-000122-MM  
Hon Stephen L. Borrello  
CA Case # 334480

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Ellis Boal (P10913)  
Counsel for Plaintiffs-Appellants  
9330 Woods Road  
Charlevoix, MI 49720  
231-547-2626  
*ellisboal@voyager.net*

Denise C. Barton (P41535)  
Erik A. Grill (P64713)  
Adam Fracassi (P79546)  
Joseph Y. Ho (P77390)  
Counsel for Defendants-Appellees  
Box 30736  
Lansing, MI 48909

Matthew Erard (P81091)  
Counsel for Plaintiffs-Appellants  
400 Bagley St # 939  
Detroit, MI, 48226  
248-765-1605  
*mserard@gmail.com*

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**Appellants' Reply**

Oral Argument Requested  
only if the Court Has Questions

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## **I. Undisputed factual points**

1. The state does not dispute appellants' assertion<sup>1</sup> that compared to historic initiative campaigns in Michigan CBFM has been extremely efficient – having twice more-than-doubled its numbers and now (as of the date this suit was filed) being 4/5 of the way toward its goal. More likely than not CBFM will be able to reach the goal of 250,000 vetted signatures in time for the 2018 election. Under the preponderance standard, this undercuts the finding of the court of claims that CBFM's “ability” to obtain enough signatures is “at most speculative.”

2. The state does not dispute appellants' assertion<sup>2</sup> that CBFM is a grass-roots group – with over 800 volunteers who brought in 90% of the signatures, 900 small-sum financial donors, and no mega-donor – of the type favored by delegates at the state constitutional convention, the type which brought this court and the supreme court to hold for “liberal” construction of initiative rights.<sup>3</sup>

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4. The state does not dispute appellants' assertion<sup>5</sup> that, should they opt to ignore the 200,000 signatures already in hand and intensify volunteer efforts to collect signatures in newly-started 180-day window, the 200,000 would be disenfranchised because they could not be asked to sign again.

5. The state does not dispute appellants' assertion<sup>6</sup> that the mere existence of the 180-day statute – if it is indeed unconstitutional – has a dispiriting effect on volunteer morale and continuing collection efforts today, and hence the statute interferes with CBFM initiative rights today, regardless that CBFM has not filed signatures.

## **II. Undisputed legal points**

1. The state does not dispute appellants' assertion<sup>7</sup> that the old and new versions of the 180-day statute have different language and different purposes, and therefore *Consumers Power v Attorney General*<sup>8</sup> will not be relevant to or control the outcome should the court reach the merits of the case.

2. The state does not dispute appellants' assertion<sup>9</sup> that until now no federal or state court anywhere has dismissed an initiative or ballot access case on the ground of unripeness.

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8 426 Mich 1, 8 (1986).

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### III. Disputed points

Disputed points are noted in the order in which they appear in appellees' brief.

1. The state asserts that appellants wrongly conflated the issues of “actual controversy” and “ripeness.”<sup>10</sup> But appellants no more conflated the two doctrines than does *Huntington Woods* itself, the case on which the court of claims relied. The court cited this passage in *Huntington Woods*:

A claim is not ripe if it rests upon contingent future events that may not occur as anticipated, or indeed may not occur at all.<sup>11</sup>

But immediately prior to this passage *Huntington Woods* said:

the most critical element is [the] requirement of a genuine case or controversy between the parties, one in which there is a real, not a hypothetical, dispute.<sup>12</sup>

Then, in the paragraph following the passage quoted by the court of claims, *Huntington Woods* went on to explain that issues are not considered hypothetical “in circumstances where declaratory relief is necessary to guide or direct future conduct.”<sup>13</sup>

Moreover, the state challenges none of the points which appellants made in the same section of their opening brief where they contested the court of claims' handling of *Huntington Woods*:

- the discussion of the timing of the 1986 complaint for declaratory judgment in

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10 Appellees' brief, p 5.

11 *City of Huntington Woods v City of Detroit*, 279 Mich App 603, 615-16 (2008).

12 *City of Huntington Woods v City of Detroit*, 279 Mich App 603, 615 (2008) (internal quotes omitted).

13 *City of Huntington Woods v City of Detroit*, 279 Mich App 603, 616 (2008).

*Consumers Power v Attorney General*,<sup>14</sup>

- the sixth circuit's discussion of justiciability in *Green Party of Tennessee v Hargett*,<sup>15</sup>
- the point that there would be no future conduct left to be guided if the litigation were to await the filing of 250,000 vetted signatures,
- the point that an unripeness holding improperly reduces this declaratory case to a mandamus case, and
- the point about the respectful attitude of constitutional convention delegates toward *ad hoc* grass-roots initiative committees like CBFM, and the courts' corresponding “liberal” construction of initiative provisions regarding them.

2. The state asserts<sup>16</sup> that CBFM's project “is over a year behind schedule.”

But this assumes the very point at issue. The state's assertion is untrue if the 180-day statute is unconstitutional.

3. The state asserts that appellants' present dilemma<sup>17</sup> – whether (a) to keep the mostly-vetted 200,000 signatures already in-hand and keep collecting, or (b) not file the collected signatures and “intensify” collection within a diminished pool – is a “false choice”.<sup>18</sup> The state ignores the obvious reality that, as in any effort, knowledge whether one is just starting or near the finish line affects one's attitude, eagerness, and performance, as well as budgeting and projections. Indeed the concepts of “budgeting”

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14 426 Mich 1, 8 (1986); see exhibit 19.

15 767 F3d 533, 545 n 1 (CA 6, 2014).

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and “projecting” and “planning” highlighted by appellants<sup>19</sup> are not discussed, nor are the words even found, in the state's brief.

4. The state asserts that Kozma individually has no ripeness issue arising from the confusion that some signers would have as to her responsibility for election prosecutions against them for signing a second time even though CBFM would have no intention to file the first signature; the state notes she has not identified a claim which such double signers would have against her.<sup>20</sup>

True, they would have no legal claim against her, but that misses the point. Inevitably Kozma would be drawn into the prosecutions as a witness, taking up her valuable time. Apprehension even of the possibility of being drawn in does the same today, but apprehension would evaporate were the court to rule on the merits.

Further, she could face criminal liability under MCL 168.544c(1), (8)(b), and (14), (which is applicable to ballot question committees under MCL 168.482(6)):

A person who aids or abets another in an act that is prohibited by this section is guilty of that act.<sup>21</sup>

and as director she might have to deal with a threat of sanctions to CBFM.<sup>22</sup>

Finally, whether such a prosecution or prosecutions would actually ensue is of course speculative. But in the previously-cited *Abbot Laboratories* case the US supreme

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19 Appellants' opening brief, pp 20-21.

20 Appellees' brief, pp 7-8.

21 MCL 168.544c(14).

22 MCL 168.544c(11)(c) and (12).



court rejected a ripeness defense grounded on the government assertion that the threat of criminal sanctions was “unrealistic.”<sup>23</sup> Even if the threat is only speculative Kozma is entitled to know now whether she or CBFM need to worry.

5. The state asserts that<sup>24</sup> under MCL 168.473b, signatures collected prior to the coming governor's election in 2018 cannot be aggregated with signatures collected later. Though the assertion is not relevant to this ripeness appeal, appellants note that MCL 168.473b is unconstitutional.<sup>25</sup>

6. The state asserts “CBFM has not alleged any business injury.”<sup>26</sup> This is not so. In a grass-roots volunteer-driven organization like CBFM, damage to volunteer morale is damage to its “business.” Possibly the state's point might be well taken were CBFM dominated by paid circulators (as many campaigns have been since *Meyer v Grant*<sup>27</sup>). But it does not apply here.

7. The state asserts<sup>28</sup> that appellants' invocation<sup>29</sup> of “liberal” construction of declaratory cases does not allow the court to decide what it contends is a speculative/hypothetical claim. Aside from that the mere existence of an unconstitutional 180-day statute today would have a damaging effect on CBFM

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25 See complaint ¶¶ 30-31.

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29 Appellants' opening brief, pp 18-19; see also exhibit 22.

operations (as explained above), election cases like this one are decided traditionally under different rules, as this court noted in a different context 12 years ago:

Election cases are special, however, because without the process of elections, citizens lack their ordinary recourse. For this reason we have found that ordinary citizens have standing to enforce the law in election cases.<sup>30</sup>

#### **IV. Conclusion**

The state's grand error throughout is its failure to recognize the US supreme court's ripeness teaching: a court must consider the “hardship to the parties of withholding court consideration.”<sup>31</sup> The court of claims and the state's brief do not recognize, much less give consideration to, the hardship of the ruling below on appellants if the 180-day statute is unconstitutional.

If the statute turns out to be constitutional, yes, CBFM will have endured no hardship. But if not, the hardship has been enormous. Accordingly, the court should turn now to the constitutional inquiry.

Wherefore appellants ask the court to reverse and remand. Being that this is a petition dispute, the court should order the court of claims to continue to give the matter priority.

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30 *Deleeuw v Canvassers*, 263 Mich App 497, 505-06 (2004); see also *Bingo Coalition for Charity – Not Politics v Board of State Canvassers*, 215 Mich App 405, 410 (1996).

31 *Abbot Laboratories v Gardner*, 387 US 136, 149 (1967); cf appellants' opening brief, p 13.

Respectfully submitted,



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Ellis Boal (P10913)  
Counsel for Plaintiffs  
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Charlevoix, MI 49720  
231-547-2626  
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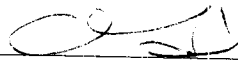
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Matthew Erard (P81091)  
Counsel for Plaintiffs  
400 Bagley St # 939  
Detroit, MI, 48226  
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*mserard@gmail.com*

Dated: November 12, 2016

### Certificate of Service

Ellis Boal certifies that on the above date he served the above pleading on the above counsel at the above address, and emailed it to them at *bartond@michigan.gov* , *grille@michigan.gov* , *fracassia@michigan.gov* , and *hoj@michigan.gov* .



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Respectfully submitted,



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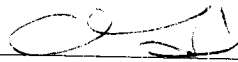
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Matthew Erard (P81091)  
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