

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI**

JACKSON COUNTY ELECTION BOARD and )  
KANSAS CITY ELECTION BOARD, )  
 )  
Plaintiffs, )  
 )  
v. )  
 )  
MARY JO SPINO, in her official capacity )  
as the Clerk of the Jackson County Legislature, )  
 )  
and )  
 )  
FRANK WHITE, in his official capacity as )  
Jackson County Executive, )  
 )  
Defendants. )

Case No.:

**VERIFIED PETITION FOR DECLARATORY AND INJUNCTIVE RELIEF**

Plaintiffs, the Jackson County Election Board and Kansas City Election Board (collectively referred to as “Election Boards”), for their Petition for Declaratory and Injunctive Relief against Mary Jo Spino, in her official capacity as Clerk of the Jackson County Legislature, and Frank White, in his official capacity as Jackson County Executive, state as follows:

**INTRODUCTION**

1. The Election Boards are committed to conducting fair, legal, and accessible elections for all Jackson County voters. The sole purpose of this legal action is to ensure that any recall election complies with Missouri and federal election laws, which establish critical timelines and procedural requirements designed to protect voters’ rights. The Election Boards take no position whatsoever on the merits or outcome of the recall election

itself but are obligated to ensure that all elections under their supervision meet legal requirements, protect military voters' rights, and provide proper notice to all eligible voters.

2. This action seeks declaratory and injunctive relief to prevent Defendants from requiring Plaintiffs to conduct a recall election on Tuesday, August 26, 2025, a date that conflicts with statutory notice provisions of Missouri and federal election law. The Election Boards seek a declaration that the notice provided by the Jackson County Clerk is insufficient to call for a recall election.

3. The Jackson County Charter cannot supersede Missouri statutory or federal requirements for the conduct of elections, and proceeding with the recall election on August 26, 2025, would force Plaintiffs to violate multiple state and federal election laws.

4. Plaintiffs seek a court order declaring that the recall election cannot lawfully be held on August 26, 2025, and requiring that it instead be scheduled for Tuesday, November 4, 2025, the next available general election date in accordance with Missouri Revised Statutes, Chapter 115.

## **PARTIES**

5. Plaintiff Jackson County Election Board is the election authority responsible for conducting elections in that portion of Jackson County, Missouri lying outside the city limits of Kansas City, Missouri.

6. Plaintiff Kansas City Election Board is the election authority responsible for conducting elections within the city limits of Kansas City, Missouri lying within Jackson County, Missouri.

7. Defendant Mary Jo Spino is the Clerk of Jackson County Legislature and is sued in her official capacity.

8. Defendant Frank White is the duly elected County Executive of Jackson County, Missouri, and is sued in his official capacity.

### **JURISDICTION AND VENUE**

9. This Court has subject matter jurisdiction over this action pursuant to article V, section 14 of the Missouri Constitution and section 478.070, RSMo.

10. Venue is proper in this Court pursuant to section 508.010, RSMo.

### **COUNTY CHARTER**

11. Jackson County is a Charter County governed by the Jackson County Charter adopted November 3, 1970.

12. Article XIV of the Jackson County Charter provides for initiative, referendum, and recall processes, including the following relevant provisions:

- a. Section 1 reserves to the people the power to recall an elective county officer;
- b. Section 7 requires petitions demanding recall of any elected county officer to be signed by registered voters equal to at least twenty percent of the total vote cast for County Executive in the county in the last election in which a County Executive was elected;
- c. Section 8 requires all such petitions to be filed with the offices or officers charged with conducting elections within the county;
- d. Section 9 mandates that “[a] special election shall be held to consider recall of a county elected officer within sixty days after the petitions are filed”; and

e. Section 10 provides that if a majority of votes cast favor recall, the office becomes vacant immediately upon certification of the results.

13. Article II, section 16.12 of the Jackson County Charter provides that the County Legislature can “call elections for any lawful purpose and establish election procedures not inconsistent with the constitution and applicable law.”

### **FACTUAL BACKGROUND**

14. On July 8, 2025, the Jackson County Clerk emailed the Election Boards what purports to be a resolution (the “Resolution”) of the County Legislature indicating the County Legislature’s intent to hold a recall election of the County Executive on Tuesday, August 26, 2025 (“Recall Election”). A copy of the Jackson County Clerk’s July 8, 2025, email with the Resolution is attached as Exhibit A.

15. The Jackson County Clerk’s email explicitly states that “this Resolution was not signed by the County Counselor but does indicate the County Legislature's intent.”

16. The Jackson County Clerk’s email further indicates that Ordinance 5993 was also adopted by the County Legislature on July 7, 2025, regarding the August 26, 2025, recall election. Unlike the Resolution, the Ordinance was signed by the County Counselor.

17. The Jackson County Clerk’s email confirms that the Ordinance was delivered to the County Executive's office for his signature on July 7, 2025, and pursuant to the Jackson County Charter, the County Executive has 10 days to act on this ordinance, with action due by July 17, 2025.

18. According to the Jackson County Clerk’s email, the County Legislature scheduled a legislative meeting on July 18, 2025, at 10 a.m. to address this legislation, indicating that the Ordinance is not yet final and may require further action.

19. The Election Boards are not aware of any time in the past when Jackson County certified that the Election Boards hold an election based merely on a resolution and not an ordinance. The Election Boards are not aware of any time in the past when Jackson County certified that the Election Boards hold election when an ordinance is not final.

20. Attached as Exhibits B and C are the certification to the Election Boards of the Jackson County Clerk for Special Elections that were held in August and November 2023, respectively.

21. The Jackson County Clerk has not provided a notice to the Election Boards requesting the Election Boards hold the recall election on August 26, 2025, in a substantially similar form as the previous notifications.

**STATUTORY CONFLICTS WITH AUGUST 26, 2025  
ELECTION DATE**

22. Conducting the recall election on August 26, 2025, would require Plaintiffs to violate multiple state and federal election laws, as detailed below.

**Missouri Election Dates**

23. The Missouri Revised Statutes, Chapter 115, requires all public elections to be held on specific dates set forth therein, including special elections.

24. Section 115.123, RSMo, specifically provides that all public elections, including special elections, shall be held on the first Tuesday after the first Monday in February, April, August, or November, with certain limited exceptions not applicable here.

25. August 26, 2025, is not an election date permitted by statute.

26. The next available general election date after certification is Tuesday, November 4, 2025.

#### **Missouri Certification Deadline (Section 115.125, RSMo)**

27. Section 115.125, RSMo, requires that the election authority must be notified of the election and issues to be placed on the ballot by 5:00 p.m. on the tenth Tuesday prior to the election (10 weeks before the election).

28. For an election scheduled for Tuesday, August 26, 2025, the statutory notification deadline would be June 17, 2025.

29. Pursuant to section 115.125(3) the election authority may accept a late notification if accompanied by a court order, but only up to eight weeks prior to the election.

30. The deadline for accepting late notification under section 115.125(3) would be July 1, 2025.

31. “No court shall have the authority to order an individual or issue be placed on the ballot less than eight weeks before the date of the election.” RSMo § 115.125(3).

32. The Election Boards have not received a notice to hold a recall election consistent with the past practice of Jackson County, only a Resolution outlining the legislature’s intent.

33. As such, the statutory deadlines have already passed for both the timely and late notification dates.

34. Defendant, the Clerk of Jackson County, Missouri did not comply with section 115.125, RSMo in certifying the date of the Recall Election.

**Federal UOCAVA Requirements (52 U.S.C. § 20302)**

35. Under the Uniformed and Overseas Citizens Absentee Voting Act (UOCAVA) and the Military and Overseas Voter Empowerment (MOVE) Act, codified at 52 U.S.C. section 20302(a)(8)(A), election authorities must make available absentee ballots to military and overseas voters at least 45 days before an election.

36. Missouri law incorporates these federal protections through sections 115.900–115.936, RSMo.

37. For an election on August 26, 2025, ballots would need to be available to UOCAVA voters by Saturday, July 12, 2025, which is 45 days before the election. However, the Missouri Secretary of State requires election authorities to have this process complete by the 46th day before an election, which would be Friday, July 11, 2025.

38. Even if certification had immediately followed the Resolution, Plaintiffs would be unable to prepare, print, and transmit ballots to UOCAVA voters within the required timeframe, disenfranchising military and overseas voters.

39. By holding an August 26, 2025, election, Plaintiffs cannot comply with the UOCAVA mandate and therefore would violate Missouri and federal law.

### **Missouri Absentee Voting Requirements (§ 115.281, RSMo)**

40. Section 115.281, RSMo, requires that absentee voting begin six weeks (42 days) before the election.

41. For an August 26, 2025, election, absentee voting would need to begin on July 15, 2025.

42. This timeline makes it almost impossible for Plaintiffs to prepare ballots and make absentee ballots available as required by law.

### **CLAIM FOR RELIEF**

43. The Missouri Constitution, article VI, section 18(b), provides that a county charter may provide for the exercise of “all powers and duties of counties and county officers prescribed by the constitution and laws of the state.”

44. A county charter, however, cannot conflict with state statutes governing elections.

45. The power described in article 18(b) is limited in that a charter or ordinance enacted under this section may not “invade the province of general legislation involving public policy of the state as a whole.” *Pepper v. St. Charles Cnty.*, 517 S.W.3d 590, 595 (Mo. App. E.D. 2017) (holding that a county remains a legal subdivision of the state and therefore “must act in harmony with the general law when it touches upon matters of state policy.”)

46. In *City of Springfield v. Goff*, 918 S.W.2d 786, 789 (Mo. banc 1996), the Missouri Supreme Court held that “[a] charter provision that conflicts with a state statute is void.” The court established that a conflict exists where a charter “permits what the

statute prohibits” or “prohibits what the statute permits.” *Id.* See also, *Noel v. Bd. of Election*, 465 S.W.3d 88, 92 (Mo. App. E.D. 2015); *Kansas City v. Hous. Auth. of Kansas City*, 150 S.W.3d 364, 369-70 (Mo. App. W.D. 2004); *Hazelwood Yellow Ribbon Comm. v. Klos*, 35 S.W.3d 457, 469 (Mo. App. E.D. 2000).

47. The Resolution purporting to call the recall election is legally insufficient to authorize an election under Missouri law. Missouri courts have consistently recognized that a resolution is not the equivalent of an ordinance and does not have the force and effect of law. See *Client Serv., Inc. v. City of St. Charles*, 182 S.W.3d 718, 721 (Mo. App. E.D. 2006) (holding that a “resolution generally is a mere expression of the council's opinion concerning some matter of administration coming within its official cognizance and provides for the disposition of a particular item of a municipality's administrative business”); see also *Rice v. Huff*, 22 S.W.3d 774, 782 (Mo. App. W.D. 2000) (“A resolution is not a law, and in substance there is no difference between a resolution, order, and a motion.”)

48. The historical practice in Jackson County has been to call elections through ordinances, not resolutions, as evidenced by Exhibits B and C.

49. The Resolution, as acknowledged in the July 8, 2025, email from the Jackson County Clerk attached as Exhibit A, was not signed by the County Counselor which may indicate concerns about its legal sufficiency.

50. While Ordinance 5993 was also adopted on July 7, 2025, was signed by the County Counselor, it is not yet final as it requires the County Executive’s signature and is subject to his review during the 10-day period.

51. The County Legislature's scheduling of a meeting on July 18, 2025, to address this legislation further evidences the incomplete nature of the authorization process for the recall election.

52. As applied to the recall election, the Jackson County Charter provision requiring a recall election within sixty days after petitions are filed conflicts with the Missouri statutes governing election timing and preparation, as it would force election authorities to violate statutory deadlines and requirements for proper election administration.

53. The Missouri Legislature established a comprehensive statutory scheme for the conduct of elections in Chapter 115, RSMo, including specific requirements for election timing, certification deadlines, absentee voting, voting of military and overseas voters, and notice to voters.

54. By requiring an election on August 26, 2025, a date not authorized by section 115.123, for elections and which conflicts with multiple statutory requirements, the Jackson County Charter's sixty-day recall provision to set the date of the recall election directly conflicts with state law.

55. By setting the recall election for November 4, 2025, the Election Boards will be able to comply with all Missouri and federal requirements for the conduct of an election.

WHEREFORE, Plaintiffs respectfully request that this Court:

- A. Issue a declaratory judgment that:
  - i. The Resolution is not legally sufficient to call the recall election;

- ii. The recall election cannot lawfully be held on August 26, 2025, because such date conflicts with Missouri and federal election laws;
  - iii. The Jackson County Charter provision requiring a recall election within sixty days after petitions are filed is void to the extent it conflicts with state election laws; and
  - iv. As the election cannot be lawfully held on August 26, 2025, the recall election must be scheduled for November 4, 2025, in accordance with section 115.123, RSMo.
- B. Issue a temporary, preliminary and permanent injunction:
- i. Enjoining Defendants from certifying or proceeding with a recall election on August 26, 2025;
  - ii. Requiring Defendants to schedule the recall election for November 4, 2025; and
  - iii. Providing such other injunctive relief as necessary to ensure compliance with Missouri and federal election laws.
- C. Award Plaintiffs their costs and attorneys' fees as may be allowed by law; and
- D. Grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

/s/ David Raymond  
David B. Raymond #35633  
Kyle Tanner #74861  
Husch Blackwell  
4801 Main Street

Kansas City, MO 64112  
(816) 980-8000 Telephone  
(816) 983-8080 FAX  
[David.Raymond@huschblackwell.com](mailto:David.Raymond@huschblackwell.com)

/s/ Charles Renner  
Charles Renner #49868  
Husch Blackwell  
4801 Main Street  
Kansas City, MO 64112  
(816) 980-8000 Telephone  
(816) 983-8080 FAX  
[Charles.Renner@huschblackwell.com](mailto:Charles.Renner@huschblackwell.com)

ATTORNEYS FOR PLAINTIFF  
KANSAS CITY ELECTION BOARD

/s/ J. D. Williamson  
J. D. Williamson #18962  
18201 Milton Thompson Road  
Lake Lotawana, MO 64086  
Telephone 816-898-4808  
[jdwilliamson@comcast.net](mailto:jdwilliamson@comcast.net)

/s/ Bradley A. Constance  
Bradley A. Constance #28670  
501 West Lexington Avenue  
Independence, MO 64050  
Telephone 816-833-1800  
Facsimile 816-833-1805  
[bconstance@scclaw.com](mailto:bconstance@scclaw.com)

ATTORNEYS FOR PLAINTIFF  
JACKSON COUNTY ELECTION  
BOARD

VERIFICATION

We, the undersigned Directors of the Jackson County Election Board and the Kansas City Election Board, having been duly sworn, state upon our personal knowledge that we have read the foregoing Verified Petition for Declaratory and Injunctive Relief and that the factual allegations contained therein are true and correct to the best of our knowledge, information, and belief.



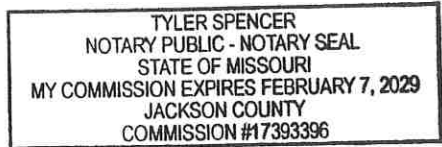
Tammy Brown, Director  
Jackson County Election Board



Sara Zorich, Director  
Jackson County Election Board

For the Jackson County Election Board:

Subscribed and sworn to before me  
this 10 day of July, 2025.

  
Notary Public

My Commission Expires: 2-7-2029

\_\_\_\_\_  
Shawn Kieffer, Director  
Kansas City Election Board

\_\_\_\_\_  
Lauri Ealom, Director  
Kansas City Election Board

For the Kansas City Election Board

Subscribed and sworn to before me  
this \_\_\_ day of July, 2025.

\_\_\_\_\_  
Notary Public

My Commission Expires: \_\_\_\_\_

VERIFICATION

We, the undersigned Directors of the Jackson County Election Board and the Kansas City Election Board, having been duly sworn, state upon our personal knowledge that we have read the foregoing Verified Petition for Declaratory and Injunctive Relief and that the factual allegations contained therein are true and correct to the best of our knowledge, information, and belief.

Tammy Brown, Director  
Jackson County Election Board

Sara Zorich, Director  
Jackson County Election Board

For the Jackson County Election Board:

Subscribed and sworn to before me  
this \_\_ day of July, 2025.

Notary Public

My Commission Expires: \_\_\_\_\_

*Shawn Kieffer*  
Shawn Kieffer, Director  
Kansas City Election Board

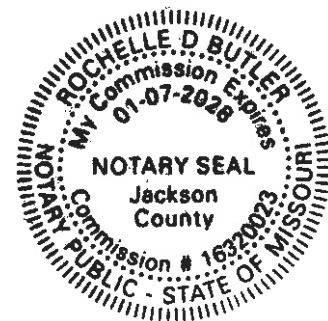
*Lauri Ealom*  
Lauri Ealom, Director  
Kansas City Election Board

For the Kansas City Election Board

Subscribed and sworn to before me  
this 10<sup>th</sup> day of July, 2025.

*Rochelle Butler*  
Rochelle Butler  
Notary Public

My Commission Expires: 1.7.28



**CERTIFICATE OF SERVICE**

I, David B. Raymond, of Kansas City, Missouri, being first duly sworn on oath, depose and state that on the 10<sup>th</sup> day of July, 2025, I sent by email a true and accurate copy of the following:

Verified Petition for Declaratory and Injunctive Relief

to the following:

Jackson County Counselor  
Bryan Covinsky  
415 E 12<sup>th</sup> Street, Ste 200  
Kansas City, MO 64106  
[bcovinsky@jacksongov.org](mailto:bcovinsky@jacksongov.org)  
Attorney for Mary Jo Spino – Jackson County Clerk

Jackson County Executive  
Frank White Jr.  
415 E 12<sup>th</sup> Street, Ste 200  
Kansas City, MO 64106  
[countyexecutive@jacksongov.org](mailto:countyexecutive@jacksongov.org)

*/s/ David B. Raymond* \_\_\_\_\_

From: **Mary Jo Spino** <[MSpino@jacksongov.org](mailto:MSpino@jacksongov.org)>

Date: Tue, Jul 8, 2025 at 11:50 AM

Subject: Resolution 21965

To: Tammy Brown <[tbrown@jcebmo.org](mailto:tbrown@jcebmo.org)>, Sara Zorich <[szorich@jcebmo.org](mailto:szorich@jcebmo.org)>, shawn@kceb.org <[shawn@kceb.org](mailto:shawn@kceb.org)>, Lauri Ealom <[lauri@kceb.org](mailto:lauri@kceb.org)>

Cc: DaRon McGee <[DMcGee@jacksongov.org](mailto:DMcGee@jacksongov.org)>, Donna Peyton <[DPeyton@jacksongov.org](mailto:DPeyton@jacksongov.org)>

Attached please find Resolution 21965 adopted by the County Legislature on Monday, July 7, 2025. As discussed in the legislative meeting, this Resolution was not signed by the County Counselor but does indicate the County Legislature's intent.

Ordinance 5993 was also adopted by the County Legislature on Monday, July 7, 2025 regarding the August 26, 2025 election. I signed it, emailed and delivered it to the County Executive's office yesterday immediately after the meeting for his signature. Per the Jackson County Charter, the County Executive has 10 days to act on this ordinance, it is due back in my office on Thursday, July 17, 2025. The County Legislature scheduled a legislative meeting on Friday, July 18, 2025 at 10 a.m. to address this legislation. I will provide an update after the meeting.

If you have any questions or concerns, kindly contact me.

*Mary Jo Spino*

Clerk of the County Legislature

415 E. 12<sup>th</sup> Street, 2<sup>nd</sup> Floor

Kansas City, MO 64106

816-881-3240

**IN THE COUNTY LEGISLATURE OF JACKSON COUNTY, MISSOURI**

**A RESOLUTION** submitting to the qualified voters of Jackson County, Missouri, at a special election to be held on Tuesday, August 26, 2025, a question regarding the recall of County Executive Frank White, Jr.

**RESOLUTION NO. 21965**, July 7, 2025

**INTRODUCED BY** DaRon McGee, County Legislator

WHEREAS, per the Constitutional Home Rule Charter of Jackson County, MO, Article XIV, Section 9, a special election shall be held to consider the recall of a county elected officer within sixty days after the petitions are filed; and,

WHEREAS, a certification letter was sent from the Jackson County Election Board and the Kansas City Election Board to the Clerk of the County Legislature on June 30, 2025, indicating a sufficient number of signatures have been verified; now therefore,

**BE IT RESOLVED** by the County Legislature of Jackson County, Missouri, as follows:

Section 1. Pursuant to the Jackson County Constitutional Home Rule Charter, Article XIV, Section 9, a question regarding the recall of Frank White, Jr. as County Executive is hereby to be submitted to the qualified voters of Jackson County, Missouri, at a special election to be held on August 26, 2025.

Section 2. This resolution shall become effective pursuant to the Jackson County Constitutional Home Rule Charter, Article XIV, Section 10, "If the majority of the votes

cast are in favor of recall, the office shall become vacant immediately upon certification of the results by the offices charged with conducting elections in the county”.

Section 3. The qualified voters at said election shall vote by ballot and the ballots to be used at said election shall contain the following language:

**JACKSON COUNTY, MISSOURI  
QUESTION # 1  
SPECIAL ELECTION  
AUGUST 26, 2025  
OFFICIAL BALLOT**

Shall Frank White, Jr. be recalled from the office of County Executive in Jackson County, Missouri?

Yes

No

If you are in favor of the question, place an “X” in the box opposite “Yes”.

If you are opposed to the question, place an “X” in the box opposite “No”.

Section 4. The Clerk of the Legislature is hereby authorized and directed to notify the Jackson County Board of Election Commissioners and the Kansas City Board of Election Commissioners of the adoption of this Resolution immediately upon passage by the County Legislature and to include in said notification all the terms and provisions required by Section 115.125, RSMo 2016.

Effective Date: This Resolution shall be effective immediately upon its passage by a majority of the Legislature.

APPROVED AS TO FORM:

\_\_\_\_\_  
County Counselor

Certificate of Passage

I hereby certify that the attached resolution, Resolution No. 21965 of July 7, 2025, duly passed on July 7, 2025 by the Jackson County Legislature. The votes thereon were as follows:

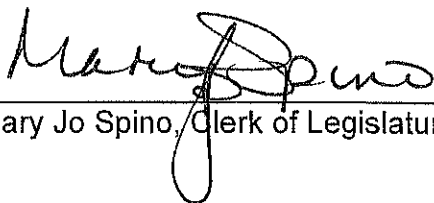
Yeas 5

Nays 3

Abstaining 1

Absent 0

7.7.2025  
Date

  
\_\_\_\_\_  
Mary Jo Spino, Clerk of Legislature



**SPECIAL ELECTION  
JACKSON COUNTY, MISSOURI  
TUESDAY, AUGUST 8, 2023**

Notice is hereby given to the qualified voters of Jackson County, Missouri, that the County Legislature has called a special election, pursuant to Ordinance #5747, to be held in said County on Tuesday, August 8, 2023, between the hours of 6:00 a.m. and 7:00 p.m. on the following question:

**JACKSON COUNTY, MISSOURI  
QUESTION #1  
SPECIAL ELECTION  
AUGUST 8, 2023  
OFFICIAL BALLOT**

Shall Jackson County impose a local use tax for the purpose of financing road and bridge construction projects within the County, including projects within the corporate limits of cities within the County, for financial assistance to homeless persons and persons at risk of becoming homeless, and for renovations and repairs to the Jackson County Courthouse in downtown Kansas City and the Eastern Jackson County Courthouse and Historic Truman Courthouse in Independence, at the same rate as the total local sales tax rate, provided that, if the local sales tax rate is reduced or raised by voter approval, the local use tax rate shall also be reduced or raised by the same action?

**YES**

**NO**

**INSTRUCTIONS TO VOTERS:** If you are in favor of the question, completely darken the oval beside the word "Yes." If you are opposed to the question, completely darken the oval beside the word "No."

**EXHIBIT B**

State of Missouri  
County of Jackson



S.S.

I, Mary Jo Spino, Clerk of the County Legislature within and for the County of Jackson, do hereby certify that the foregoing is the Official Ballot for Question #1, as provided in Ordinance #5747.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seal of said County, at my office in Kansas City, Missouri this 26th day of May, 2023.

A handwritten signature in black ink that reads 'Mary Jo Spino'. The signature is written in a cursive style and is positioned above a horizontal line.

Mary Jo Spino  
Clerk of the County Legislature  
Jackson County, Missouri



MJB/mth



**SPECIAL ELECTION  
JACKSON COUNTY, MISSOURI  
TUESDAY, NOVEMBER 7, 2023**

Notice is hereby given to the qualified voters of Jackson County, Missouri, that the County Legislature has called a special election, pursuant to Ordinance #5764, to be held in said County on Tuesday, November 7, 2023, between the hours of 6:00 a.m. and 7:00 p.m. on the following question:

**JACKSON COUNTY, MISSOURI  
QUESTION #1  
SPECIAL ELECTION  
NOVEMBER 7, 2023  
OFFICIAL BALLOT**

Shall Jackson County impose a local use tax for the purpose of financing road and bridge construction projects within the County, including projects within the corporate limits of cities within the County, for financial assistance to homeless persons and persons at risk of becoming homeless, and for renovations and repairs to the Jackson County Courthouse in downtown Kansas City and the Eastern Jackson County Courthouse and Historic Truman Courthouse in Independence, at the same rate as the total local sales tax rate, provided that, if the local sales tax rate is reduced or raised by voter approval, the local use tax rate shall also be reduced or raised by the same action?

**YES**

**NO**

**INSTRUCTIONS TO VOTERS:** If you are in favor of the question, completely darken the oval beside the word "Yes." If you are opposed to the question, completely darken the oval beside the word "No."

State of Missouri  
County of Jackson



S.S.

I, Mary Jo Spino, Clerk of the County Legislature within and for the County of Jackson, do hereby certify that the foregoing is the Official Ballot for Question #1, as provided in Ordinance #5764.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seal of said County, at my office in Kansas City, Missouri this 8th day of August, 2023.

A handwritten signature in black ink that reads 'Mary Jo Spino'. The signature is written in a cursive style and is positioned above a horizontal line.

Mary Jo Spino  
Clerk of the County Legislature  
Jackson County, Missouri



MJB/mth

**From:** [Missouri Courts eFiling System](#)  
**To:** [Missouri Courts eFiling Subscriber](#)  
**Cc:** [Raymond, David](#); [16th Judicial Circuit \(Jackson County\)](#)  
**Subject:** Accepted for Filing - New Case - JCEB AND KCEB V. MARY JO SPINO AND FRANK WHITE, Jackson County - Kansas City - Civil  
**Date:** Thursday, July 10, 2025 4:02:11 PM

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[EXTERNAL EMAIL]

The filing EF39578897 on 7/10/25 at 3:46 PM was **Automatically Created** in Jackson County - Kansas City - Civil on 7/10/25 at 3:46 PM.

Below is important information regarding this filing.

No Judge assigned at this time.

<b>eFiling Confirmation Number</b>	<b>EF39578897</b>
<b>Filer Reference Number</b>	<b>None entered by filer</b>
<b>Case Number</b>	<a href="#">2516-CV21738</a>
<b>Case Description</b>	<b>JCEB AND KCEB V. MARY JO SPINO AND FRANK WHITE</b>

**Document(s):**

<b>Document Category and Type</b>	<b>Petition/Initial Pleading/Criminal to/for/filed in - Circuit Court</b>
<b>Document Title</b>	petition for Declaratory and Injunctive Relief.PDF
<b>Attachment(s)</b>	Exhibit A 2025.07.08 Jackson County Clerk Email - Resolution and Ordinance.PDF Exhibit B 2023 August Special Election Certification.PDF Exhibit C 2023 November Election Certification.PDF
<b>Filed On Behalf Of</b>	<b>JACKSON COUNTY ELECTION BOARD ; KANSAS CITY ELECTION BOARD</b>

<b>Document Category and Type</b>	<b>Filing - Other/Miscellaneous - Confidential Filing Information Sheet</b>
<b>Document Title</b>	Civil Filing Sheet.PDF
<b>Attachment(s)</b>	
<b>Filed On Behalf Of</b>	<b>JACKSON COUNTY ELECTION BOARD ; KANSAS CITY ELECTION BOARD</b>

If a **summons** has been processed by the clerk's office, click the Case Number link above to print the summons and any other necessary documents and deliver the summons and pleadings to the sheriff or special process server. Service fees are paid directly to the sheriff or special process server. An alias summons is handled in the same way as the original summons.

If a **garnishment** has been processed by the clerk's office, click the Case Number link above to print the garnishment, return page and interrogatories, and assemble them for service. Make sure there are two sets of interrogatories attached to the garnishee's copy of the garnishment and return page, so your office and the court each receive a set of answers. Finally, attach another set of the garnishment and return page to the front of the garnishee's copy for the sheriff to make the return. Forward the completed sets to the proper sheriff with a check for service fees. In the future, all summons returns and garnishment returns sent back to your office instead of the court can be scanned and electronically filed with the court.

If a **dissolution** has been filed with children involved, please print the [parenting handbook](#) to provide to petitioner or respondent or contact the court for a copy of the parenting handbook.

Click to access the [Missouri eFiling System](#).

Click here for [Manage My Case](#).

This e-mail is auto generated. Please do not respond. **If you have a concern with your filing, please contact the court.** If you need technical assistance, please contact the Office of State Courts Administrator Help Desk at [osca.help.desk@courts.mo.gov](mailto:osca.help.desk@courts.mo.gov) or toll-free by phone at 1(888)541-4894. The Help Desk is available 7:30 a.m. to 5:00 p.m. Monday through Friday, excluding state holidays.