

**IN THE CIRCUIT COURT OF COLE COUNTY
STATE OF MISSOURI**

))
RONALD J. CALZONE))
Plaintiff,))
))
vs.))
))
Chris Koster, Missouri Attorney General))
and))
Richard Fordyce, Director of the Missouri))
Department of Agriculture))
and))
Kevin Keith, Director of the Missouri))
Department of Transportation))
and))
Nia Ray, Director of the Department))
of Revenue))
and))
Margie Vandeven, Commissioner of the))
Dept. of Elementary and Secondary Education))
and))
Gail Vasterling, Director Department of))
Health and Senior Services))
and))
John Huff, Director Dept. of Insurance,))
Financial Institutions, & Professional))
Registration))
))
Defendants))
))

CASE NO. _____

COME NOW, the Plaintiff and states as follows:

1) This Action is a challenge to the constitutionality of SB 672 (2014) based on procedural and substantive infirmities, including a change to the original purpose,

multiple subjects, and provisions that amount to unconstitutional “special laws.”

2) Plaintiff Ron Calzone is a taxpayer and citizen of Missouri.

3) Plaintiff is regularly engaged as an uncompensated citizen activist in an effort to promote constitutional governance, including efforts to ensure that legislation passed by the General Assembly adheres to constitutional requirements both substantively and procedurally. Such activities include educating legislators about *constitutional limitations on their legislative powers* as well as their affirmative duties.

HOW PLAINTIFF IS IMPACTED

4) The Plaintiff is directly impacted by the unconstitutional passage of HB 672 by virtue of his standing as one of the Missouri citizens in whom “all political power is vested in and derived from” (*Mo. Const. Article I § 1*), since, when the government the citizens of Missouri established passes laws which those people must live under without consideration to the limits the people put on their authority to pass such laws, the citizens, including the Plaintiff, are greatly insulted.

5) The Plaintiff is particularly impacted by the unconstitutional passage of HB 672 in light of the many hours he spends virtually every week of the legislative session in an effort to keep legislation constitutional – he is much more than a casual observer of the legislative process.

6) The Plaintiff is also directly impacted by virtue of his standing as a Missouri taxpayer, since HB 672 results in the expenditure of state funds in numerous ways by various state agencies.

STANDING

7) By virtue of his status as a citizen and his status as a legislative watchdog, Plaintiff clearly meets the two principal reasons for the rule which requires standing, namely: (1) “to assure that there is a sufficient controversy between the parties that the case will be adequately presented to the court” and (2) “preventing parties from creating controversies in matters in which they are not involved and which do not directly affect them.” *Ryder v. County of St. Charles*, 552 SW 2d 705 (1977) In the landmark *Hammerschmidt* opinion, the Missouri Supreme Court pointed out five ways constitutional constraints on the legislative procedure preserve the integrity of that process. The fourth in that list recognized ***the right of the citizens of the state to be apprised of the status of the legislation*** they are expected to live under, specifically so citizens have a “opportunity of being heard thereon.” By the Court's reasoning, the Plaintiff has standing as a matter of constitutional right of citizenship, with or without taxpayer standing, since the sort of unconstitutional legislative practices alleged in this petition serve to obfuscate the legislative process to the Plaintiff's prejudice. (See also, Mo. Const. Article I Section 14)

Fourth, article III, section 23, is designed to assure that the people are fairly apprised, "through such publication of legislative proceedings as is usually made, of the subjects of legislation that are being considered in order that they have [an] opportunity of being heard thereon...." Small, 356 S.W.2d at 868. *Hammerschmidt v. Boone County*, 877 SW 2d 98 (1994)

8) Plaintiff also enjoys standing as a taxpaying citizen of Missouri. “This Court has repeatedly held that taxpayers do, in fact, have a legally protectable interest in the proper use and expenditure of tax dollars.” *Lebeau v. Commissioners Of Franklin*

County, 422 SW 3d 284 (2014) Based on the fiscal note prepared by the General Assembly, the projected costs to state agencies resulting from implementing SB 672 include:

ESTIMATED NET EFFECT ON OTHER STATE FUNDS

FUND AFFECTED	FY 2015	FY 2016	FY 2017
Agriculture Protection Fund	(\$60,269)	(\$70,316)	(\$71,205)
MO Real Estate Appraiser Commission Fund	(Unknown)	(Unknown)	(Unknown)
Road Fund	(Greater than \$100,000)	(Greater than \$100,000)	(Greater than \$100,000)
Total Estimated Net Effect on <u>Other</u> State Funds	(Greater than \$160,269)	(Greater than \$170,316)	(Greater than \$171,205)

See Exhibit L.

DEFENDANTS

9) Chris Koster in his official capacity of the Attorney General for the state of Missouri.

10) Richard Fordyce in his official capacity as the Director of the Missouri Department of Agriculture.

11) Kevin Keith in his official capacity as the Director of the Missouri Department of Transportation.

12) Nia Ray in her official capacity as the Director of the Department of Revenue

13) Margie Vandeven in her official capacity as the Commissioner of the

Department of Elementary and Secondary Education.

14) Gail Vasterling in her official capacity as the Director Department of Health and Senior Services.

15) John Huff in his official capacity as the Director of the Department of Insurance, Financial Institutions, & Professional Registration.

LEGAL BASIS AND TIMELINESS OF ACTION

16) This action is brought pursuant to Section 516.500, RSMo 2014 which states:

No action **alleging a procedural defect in the enactment of a bill into law** shall be commenced, had or maintained by any party later than the adjournment of the next full regular legislative session following the effective date of the bill as law, unless it can be shown that there was no party aggrieved who could have raised the claim within that time. In the latter circumstance, the complaining party must establish that he or she was the first person aggrieved or in the class of first persons aggrieved, and that **the claim was raised not later than the adjournment of the next full regular legislative session** following any person being aggrieved. In no event shall an action alleging a procedural defect in the enactment of a bill into law be allowed later than five years after the bill or the pertinent section of the bill which is challenged becomes effective. Emphasis added.

17) This action is brought before the adjournment of the next full regular legislative session following the enactment of SB 672.

VENUE

18) Cole County Circuit Court is the proper venue since the seat of Missouri government and the various departments named as defendants reside in Cole County.

“In all actions in which there is no count alleging a tort, venue shall be determined as follows: (1) When the defendant is a resident of the state, either in the county within which the defendant resides, or in the county within which the plaintiff resides, and the defendant may be found;”
508.010 RSMO 2014

CONTROLLING LAWS

19) Missouri Constitution Article III § 21 states that,

“The style of the laws of this state shall be: "Be it enacted by the General Assembly of the State of Missouri, as follows." No law shall be passed except by bill, and **no bill shall be so amended in its passage through either house as to change its original purpose.** Bills may originate in either house and may be amended or rejected by the other. Every bill shall be read by title on three different days in each house.” Emphasis added.

20) Missouri Constitution Article III § 23 states that,

“**No bill shall contain more than one subject** which shall be **clearly expressed in its title**, except bills enacted under the third exception in section 37 of this article and general appropriation bills, which may embrace the various subjects and accounts for which moneys are appropriated.” Emphasis Added.

21) Missouri Constitution Article III § 40(30) states that,

“The general assembly **shall not pass any local or special law: ... (30) where a general law can be made applicable**, and whether a general law could have been made applicable is a **judicial question** to be judicially determined without regard to any legislative assertion on that subject.”
Emphasis added.

BILL HISTORY

22) Senate Bill 672 was introduced and First Read in the Missouri Senate on

January 8, 2014, as a bill less than 3 pages in length with the title,

“AN ACT To repeal section 56.363, RSMo, and to enact in lieu thereof one new section relating to county prosecutors.”

A true and accurate copy of the Introduced version of SB 672 is provided, herein, as Exhibit A.

23) On March 10, 2014, a Senate Committee Substitute for SB 672 was adopted by the entire Senate. That version was approximately 7 pages long and titled,

“AN ACT To repeal sections 56.067, 56.265, 56.363, 56.807, and 56.816, RSMo, and to enact in lieu thereof five new sections relating to county prosecutors.

A true and accurate copy of the Senate Committee Substitute version of SB 672 is provided, herein, as Exhibit B.

24) SB 672 was further amended on March 10, 2014, during the perfection process on the Senate floor. Although the bill had grown to nearly 17 pages, it still pertained exclusively to prosecutors. The title was amended to read,

“AN ACT To repeal sections 1.020, 56.010, 56.060, 56.067, 56.265, 56.363, 56.430, 56.805, 56.807, 56.816, and 211.411, RSMo, and to enact in lieu thereof thirteen new sections relating to county prosecutors.

A true and accurate copy of the Perfected version of SB 672 is provided, herein, as Exhibit C.

25) On May 13, 2014, the perfected version, SENATE COMMITTEE SUBSTITUTE FOR SENATE BILL NO. 672 was Third Read and Passed by a vote of 32 yeas, 1 Absent with leave, and 1 vacancy. A true and accurate copy of the Senate Journal

pages relating to that vote are attached as Exhibit D.

26) On April 17, 2014, the House Committee on General Laws reported Senate Committee Substitute for Senate Bill 672 “Do Pass with House Committee Substitute”.

The bill's title now read,

“AN ACT To repeal sections 37.020, 49.266, 56.010, 56.060, 56.067, 56.265, 56.363, 56.800, 56.805, 56.807, 56.811, 56.816, 56.827, 56.833, 56.840, 67.281, 77.030, 79.050, 79.130, 105.684, 105.687, 105.688, 105.690, 192.310, 321.130, 321.210, 321.322, 408.040, 488.026, 488.305, 525.040, 525.070, 525.080, 525.230, 525.310, and 578.120, RSMo, and to enact in lieu thereof forty-five new sections relating to political subdivisions.”

A true and accurate copy of the House Journal page 1186 relating to that report is attached as Exhibit F.

27) On April 30, 2014, in House floor actions, House amendments 1 through 17, with an amendment to amendment 17, were adopted. A true and accurate copy of the House Journal pages 1431- 1458 relating to those amendments is attached as Exhibit F.

28) On April 30, 2014, the House of Representatives adopted House Committee Substitute for Senate Committee Substitute for Senate Bill 672 by voice vote. See House Journal page 1461 in Exhibit F.

29) On April 30, 2014, the House of Representatives Third Read and Passed House Committee Substitute for Senate Committee Substitute for Senate Bill 672 by a vote of 88 ayes, 61 noes, 10 absent with leave, and 3 vacancies. See House Journal page 1462 in Exhibit F.

30) On May 1, 2014, the Senate refused to concur in the House Committee

Substitute passed by the House. (See the 61st day of the House and Senate Journals.)

31) On May 8, 2014, the Senate adopted Conference Committee Report #1 by a vote of 27 yeas, 5 noes, and 2 vacancies. (See the 65th day of the Senate journal.)

32) On May 12, 2014, the House refused to adopt Conference Committee Report #1 and requested further conference. (See the 66th day of the House journal.)

33) On May 13, 2014, the Senate adopted Conference Committee Report #2 and then Third Read and Passed CONFERENCE COMMITTEE SUBSTITUTE NO. 2 FOR HOUSE COMMITTEE SUBSTITUTE FOR SENATE COMMITTEE SUBSTITUTE FOR SENATE BILL NO. 672, by a vote of 29 yeas, 3 noes, 2 vacancies. See Exhibit H.

34) On May 16, 2014, the House adopted and then Third Read and Passed CCS#2 HCS SCS SB 672, by a vote of 98 yeas, 43 noes, 18 absent with leave, 4 vacancies. A true and accurate copy of the House Journal pages relating to that vote is attached as Exhibit J.

35) The final title for SB 672 read,

“AN ACT To repeal sections 49.266, 56.067, 56.265, 56.363, 56.807, 56.816, 67.281, 67.320, 79.130, 94.270, 182.802, 192.310, 304.190, 321.322, 339.507, 348.407, 408.040, 488.305, 525.040, 525.070, 525.080, 525.230, and 525.310, RSMo, and to enact in lieu thereof thirty-three new sections relating to political subdivisions, with an existing penalty provision, and an effective date for certain sections.”

See Exhibit K.

36) The subject bill was delivered to the Governor on May 30, 2014, whereupon he signed it on July 8, 2014.

37) The official fiscal note for the final version of SB 672 included forecasts of numerous expenditures by the state as well as local entities. See Exhibit L.

NATURE OF ACTION

38) This action is for a declaratory judgment that Senate Bill 672 is unconstitutional due to procedural and substantive infirmities and void, and an injunction to prevent the enforcement of any of its provisions.

Count 1

The Purpose of SB 673 Was Changed By Amendments Subsequent to the Introduction of the Bill And the Purpose of the Finally Passed Version Was Not the Same as the Introduced Version in Violation of Missouri Constitution Article III Section 21

39) Plaintiff hereby restates and incorporates paragraphs 1 through 38, above, as if set forth fully herein.

40) Missouri Constitution Article III Section 21 is clear and concise with its mandate that every bill must remain true to its original purpose, that is, the bill's purpose at the point it was filed or introduced. Any bill whose purpose has changed is, therefore, constitutionally infirm.

“The style of the laws of this state shall be: 'Be it enacted by the General Assembly of the State of Missouri, as follows.' No law shall be passed except by bill, and **no bill shall be so amended in its passage through either house as to change its original purpose.** Bills may originate in either house and may be amended or rejected by the other. Every bill shall be read by title on three different days in each house.” Emphasis added.
Missouri Constitution Article III Section 21

41) With the exception of the provisions of Section 37 in Article III and general

appropriation bills, the one “purpose” of a bill is analogous to its one “subject” and the subject must be clearly expressed in its title, per Article III Section 23: Missouri Constitution Article III § 23 states that,

“**No bill shall contain more than one subject** which shall be **clearly expressed in its title**, except bills enacted under the third exception in section 37 of this article and general appropriation bills, which may embrace the various subjects and accounts for which moneys are appropriated.” Emphasis Added.

42) The Missouri Supreme Court has ruled that the purpose of a bill can be fairly ascertained from its title. “ In determining the original, controlling purpose of the bill for purposes of determining severance issues, a title that 'clearly' expresses the bill's single subject is exceedingly important.” *Hammerschmidt v. Boone County*, 877 SW 2d 98 (1994) at 103.

43) The difference between the official titles for the **introduced version** of SB 672 was dramatically different than the official title for the **finally passed version**.

“AN ACT To repeal section 56.363, RSMo, and to enact in lieu thereof one new section relating to county prosecutors.”

See Exhibit A.

“AN ACT To repeal sections 49.266, 56.067, 56.265, 56.363, 56.807, 56.816, 67.281, 67.320, 79.130, 94.270, 182.802, 192.310, 304.190, 321.322, 339.507, 348.407, 408.040, 488.305, 525.040, 525.070, 525.080, 525.230, and 525.310, RSMo, and to enact in lieu thereof thirty-three new sections relating to political subdivisions, with an existing penalty provision, and an effective date for certain sections.”

See Exhibit K.

44) The introduced version of SB 672, and the version originally passed by the

Senate, related only to prosecutors. By the reckoning of Senate Research, the final bill encompassed approximately nineteen distinct subjects, most of which were not related to the original, controlling purpose. See Exhibit M.

COUNTY PROPERTY – § 49.266
PROSECUTING ATTORNEYS - §§ 56.067, 56.363, 56.807, & 56.816
LAW ENFORCEMENT OFFICER IMMUNITY - § 57.095
INSTALLATION OF FIRE SPRINKLERS - § 67.281
JEFFERSON COUNTY MUNICIPAL COURTS - § 67.320
INITIATIVE PETITION IN SAVANNAH- §§ 79.130 & 79.135
CITY FEES IN FLORELL HILLS AND EDMUNDSON - § 94.270
COURT VOLUNTEERS - § 105.1415
PUBLIC FINANCIAL INCENTIVES - § 135.980
PUBLIC LIBRARY DISTRICT - § 182.802
AMBULANCE DISTRICT DETACHMENT - § 190.088
HEALTH OFFICERS IN ST. CHARLES - § 192.310
LATERAL SEWER SERVICE LINE REPAIR PROGRAM - § 249.424
FARM-TO-SCHOOL PROGRAM - §§ 262.960, 262.962, & 348.407
MOTOR VEHICLE HEIGHT AND WEIGHT LIMITS - § 304.190
ANNEXATION PROCEDURES IN HARRISONVILLE - § 321.322
MISSOURI REAL ESTATE APPRAISERS COMMISSION - §§ 339.507
& 339.531
SPECULATIVE ACCUMULATION OF ASPHALT SHINGLES - §
407.1610
GARNISHMENTS - §§ 408.040, 488.305, 525.040 to 525.310

45) While the purpose of the introduced version of SB 672 was clear and concise and focused on one subject, the purpose of the finally agreed to and passed version might be best described as “catch all”, and some of what it “caught” is not even consistent with the unconstitutionally vague *new purpose* of “political subdivisions.” The altered purpose of SB 672 does great harm to the integrity of the legislative process, was an obstacle to the ability of legislators to grasp and intelligently discuss the bill, placed legislators and the Governor in a position of having to accept some matters which they do

not support in order to enact that which they earnestly support. See *Hammerschmidt v. Boone County*, 877 SW 2d 98 (1994) at 101. And, of greatest concern to the Plaintiff, the changed purpose **made it virtually impossible for him and fellow citizen activists to be “fairly appraised” of the legislation, and thereby violated his personal rights.** Ibid at 102. On information and belief, SB 672 is one of the most blatant violations of Article III Section 21 in quite some time.

WHEREFORE, Plaintiff prays that the Court, pursuant to § 516.500, RSMo, hear this action; that the Court issue a declaratory judgment that the procedure by which SB 672 was passed, that is, changing its purpose, violated the Missouri Constitution Article III Section 21, and that Senate Bill 672 is void, and because it is impossible for this court to know how legislators would have voted for any severed portion of this bill, issue an injunction to prevent the enforcement of any of its provisions, as well as provide for any other remedies the Court determines support the Constitution and further justice.

Count 2

The Finally Passed Version of SB 673 Contained Multiple Subjects in Violation of Missouri Constitution Article III Section 23

46) Plaintiff hereby restates and incorporates paragraphs 1 through 45, above, as if set forth fully herein.

47) The allegation that SB 672 violates the single subject requirement of Missouri Constitution Article III Section 23 is supported by the same set of facts that implicate that bill in Count 1 of this petition.

48) Even if the Constitution allowed legislators to change the purpose of bills at

will, and thereby nullify Claim 1, the *many distinct subjects* of the amendments adopted by the House make the bill constitutionally infirm based on Article III Section 23. Based on the final title, the new purpose of the bill was “political subdivisions” – whatever that might mean. Had the bill been relegated to matters pertaining to, for instance, the structure of political subdivisions themselves, such a title might have been adequate. In the instant case, however, the bill primarily included matters about things that happen within political subdivisions, but that could be said of almost anything that government does – everything except what is accomplished by *statewide* agencies rather than some subdivision of the state.

49) SB 672 includes various subjects that are not at all functions of “political subdivisions,” but, rather, new responsibilities of *statewide* agencies. Examples include the new “Farm-To-School Program” in §§ 262.960, 262.962, & 348.407, which is to be a function of the department of agriculture, and the "Missouri Real Estate Appraisers Commission" in §§ 339.507 & 339.531, a new entity that serves *statewide* under the division of professional registration. There as many as 19 distinct subjects in SB 672, depending how generous the Court decides to be with the people's power, but if anything is clear, the Farm-To-School Program and the Missouri Real Estate Appraisers Commission are distinct subjects from each other and any other subject one might construe from the changed purpose of “political subdivisions.” It only takes the addition of one subject beyond the controlling purpose or subject to constitute a procedural infirmity of a bill based on Article III Section 23.

WHEREFORE, Plaintiff prays that the Court, pursuant to § 516.500, RSMo, hear

this action; that the Court issue a declaratory judgment that the procedure by which SB 672 was passed, namely, incorporating multiple subjects, violated the Missouri Constitution Article III Section 23, and that Senate Bill 672 is void, and because it is impossible for this court to know how legislators would have voted for any severed portion of this bill, issue an injunction to prevent the enforcement of any of its provisions, as well as provide for any other remedies the Court determines support the Constitution and further justice.

Count 3

The Title for SB 672 Was Changed in Violation of Missouri Constitution Article III Section 21

50) Plaintiff hereby restates and incorporates paragraphs 1 through 49, above, as if set forth fully herein.

51) That the title of a bill properly notify the purpose and scope of a bill was important enough to the people of Missouri for them include a constitutional mandate that titles be properly applied to every bill. Properly used, the title allows the people's representatives, and sometimes the people themselves, as is the case with the Plaintiff, to keep a watchful eye over the legislative process when they don't have the means to hire an army of lobbyists to protect their interests.

52) If the title applied to bills is made to be more or less static and truly reflect the potential scope of a bill – what it is and what it might possible become – then an observer of legislation can perform sort of “legislative triage,” and sort out what bills could and could not possibly affect is interests.

53) If the title of a bill can be fluid, changing with the changing purpose of a bill – a changing purpose that is allowed because it fits the changed title – then a bill the citizen could have otherwise marked off as inconsequential to his interests, might still evolve into a threat. Put more succinctly, allowing legislators to change the title of bills to fit the evolving bill, rather than requiring the evolution of the bill to remain true to the original title, defeats a major portion of the purpose for the Article III Section 23 requirement that, “No bill shall contain more than one subject which shall be clearly expressed in its title”, and the Section 21 requirement that “ Every bill shall be read by title on three different days in each house.”

54) The radical change in the title of SB 672 and other bills does injury to the Plaintiff and other citizens who are, then experience a diminished opportunity to influence the laws they must live under. Such disenfranchisement violates the provisions of Article III Sections 21 and 23, as well as Article I Section 14.

WHEREFORE, Plaintiff prays that the Court, pursuant to § 516.500, RSMo, hear this action; that the Court issue a declaratory judgment that the procedure by which SB 672 was passed, specifically, the title was changed, violated the Missouri Constitution Article III Section 21, 23 and perhaps Article I Section 14, and that Senate Bill 672 is void, and because this infirmity relates to the entire bill, issue an injunction to prevent the enforcement of any of its provisions, as well as provide for any other remedies the Court determines support the Constitution and further justice.

Count 4

SB 672 Contains Numerous Provisions Which Are Unconstitutional Special Laws in Violation of Missouri Constitution Article III Section 40(30)

55) Plaintiff hereby restates and incorporates paragraphs 1 through 54, above, as if set forth fully herein.

56) Missouri Constitution Article III Section 40(30) states that, “The general assembly **shall not pass any local or special law: ... (30) where a general law can be made applicable**, and whether a general law could have been made applicable is a **judicial question** to be judicially determined without regard to any legislative assertion on that subject.” Emphasis added.

57) This constitutional limitation on legislative powers is buttressed by the “good of the whole” clause in Article I Section 1 and the “general welfare” and “equal rights and opportunity under the law” clauses of Section 2. Laws that confer special or preferential treatment of some but not all are, generally, unconstitutional. The same is especially true of laws that prejudiced some, who may not enjoy sufficient numbers or political power to fight back.

58) SB 672 contains at least 5 special laws – laws that could have each been a general law, had the will of the General Assembly provided for them. The language used by Senate Research to describe the various subjects in SB 672 tell a story of special laws that were clearly aimed at specific areas but was couched in language such as “a city not within a county” to give the appearance that they were general laws.

59) If these various provisions were constitutional by virtue of the fact that a general law could not be used to meet their need, the legislation could simply name the

area. “A city not within a county” could simply be rendered “St. Louis City” in the bill text.

60) The following is a list of provisions in SB 672 that violate Article III Section 40(30). The descriptions of these provisions are from Senate Research's Bill Summary for the Truly Agreed to and Finally Passed version of SB 672. See Exhibit M.

§§ 79.130 & 79.135, allowing voters in the City of Savannah to propose ordinances via initiative petition.

§ 135.980, prohibits the City of St. Louis from imposing restrictions by ballot measure on public financial incentives authorized by statute for businesses involved in bituminous coal and lignite surface mining.

§ 82.802, authorizes any public library district located in Saline County to impose a sales tax not to exceed one-half of one cent upon voter approval.

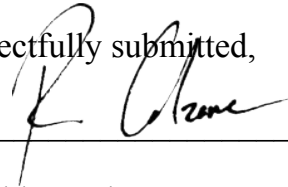
A § 190.088, relating to the City of Riverside's ambulance district

a § 192.310, Current law exempts cities with a population of 75,000 or more from certain laws dealing with local and state health rules. Under this act, the City of St. Charles is also exempted from such laws.

WHEREFORE, Plaintiff prays that the Court, pursuant to § 516.500, RSMo, hear this action; that the Court issue a declaratory judgment that SB 672 included special laws in violation of Missouri Constitution Article III Section 40(30), and that Senate Bill 672 is void, and because it is impossible for this court to know how legislators would have voted for any severed portion of this bill, issue an injunction to prevent the enforcement

of any of its provisions, as well as provide for any other remedies the Court determines support the Constitution and further justice.

Respectfully submitted,



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PLAINTIFF

Certificate of Service

I, Ronald J. Calzone, do hereby certify that a true and correct copy of the foregoing petition was provided to the Cole County Sheriff on, May 29, 2015, to be served on each of the following defendants.

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Continued...

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Table of Exhibits

Exhibit A. Introduced version of Senate Bill 672

Exhibit B. Senate Committee Substitute for Senate Bill 672

Exhibit C. Perfected version of Senate Bill 672

Exhibit D. Senate Journal reporting the vote on Senate Bill 672

Exhibit F. House Journal reporting Senate Bill 672 “do pass with House Committee Substitute”

House Journal reporting adoption of amendments 1-17 and HCS SCS SB 672

House Journal reporting the Third Read vote for Senate Bill 672

Exhibit H. Senate Journal reporting Senate's adoption of Conference Committee Report #2

Senate Journal reporting Senate Third Read of CCR#2 HCS SCS SB 672

Exhibit J. House Journal reporting House adoption then 3rd Read of CCR#2 HCS SCS SB 672

Exhibit K. Final Truly Agreed to and Passed version of SB 672

Exhibit L. Final Fiscal Note for SB 672

Exhibit M. Senate Research's Summary of the final version of SB 672