

**Protest to Petition Seeking a Referendum to Repeal Ordinance  
2025-29**

CITY OF LAKEWOOD, CO

2025 DEC -8 A 11: 24

**Petition Designated Representatives**

John Frogge  
1971 S. Parfet Dr.  
Lakewood, CO

OFFICE OF THE  
CITY CLERK

Karen Miller  
9490 W. 10th Ave.  
Lakewood, CO

**Petition Protesters**

Joshua Comden, Ph.D  
Reverend Benjamin David Hensley

1. Joshua Comden, Ph.D and Reverend Benjamin David Hensley are both registered electors in the City of Lakewood.
2. A petition to seek a referendum to repeal Ordinance 2025-29 was filed with the Lakewood City Clerk on Monday November 10, 2025.
3. The designated representatives for this petition are John Frogge and Karen Miller.
4. The Lakewood City Clerk determined that a minimum of 3,517 valid elector signatures and matching information are required to place a referendum to repeal Ordinance 2025-29 before the voters. However, this number was incorrectly calculated. The correct minimum signature requirement is at least 3,639. The Lakewood City Charter states that a referendum petition must contain at least 3% of the "registered" voters in the city on the date of the last regular municipal election. The Jefferson County Clerk and Records Offices updates registered voters and provides a list of Lakewood registered voters. Based on an analysis of the actual number of registered voters at the last regular municipal election provided by the County Clerk, the Petitioners are required by the City Charter to provide at least 3,639 valid signatures to meet the legal minimum. A complete analysis of this is attached below.
5. This protest has been filed within the 30 day requirement contained in 2.52.150(D) of the Lakewood Municipal Code.
6. The designated representatives have filed an insufficient set of petition sections and individual signature lines demonstrating that the petition lacks a sufficient number of city electors. The particular grounds of the protest, section, page, and lines protested are detailed below.
7. Protester requests the Lakewood City Clerk issue a determination of petition invalidity.
8. Protester requests that the Lakewood City Clerk take note of violations and invalidity related to this petition and consider whether there are the same violations applicable to review of further petitions from these same two designated representatives.

## Particular Grounds For Protest

There are significant public policy reasons for all petition requirements. A person's identifiable signature is the basis upon which it is determined that they are eligible electors. This is true whether on the envelope of a mail-in ballot, an in-person signature card, or on a ballot question petition. The absence of their verifiable signature automatically invalides whatever is otherwise completed on that line of a petition.

The requirement on an elector to legibly print their name and full address where they are registered is the only way a search can be done to determine if they are in fact registered, and registered at the precise listed address. If they have not printed their name and full address it is impossible to validate that line. For a voter who cannot write legibly, the law allows someone to assist the voter. However, that assistance has to be indicated on the petition if that entry is to be counted.

Circulators are provided a form approved by the City Clerk. Circulators must use this form and collect information in a certain manner. The requirement to write within the designated boxes is a simple requirement to ensure that all required information is provided in the clearest manner. An elector should not provide information outside the designated form location, just as they would not be allowed to provide it at the top of the petition sheet, on the back of a petition, or on an attached sheet.

The requirement to provide complete information such as full address, City, and Zip Code is necessary to fully validate the voter at that address. Electors are required to register at a specific location and must change their registration even if simply moving to another unit in the same residential complex.

The requirement that the date of line completion be provided and legible is crucial because that's the only way to see if the line was completed too early or too late for lawful circulation.

It is understood that electors have the right to correct information they have mistakenly provided. The elector themselves makes the change and must initial that change next to the correction. The requirement of a proper initial is essential. Otherwise, anyone could later alter or add information without the electors' approval. A circulator cannot make changes even if they indicate they did so by adding their own initials.

The requirement of a sworn or affirmed statement by a circulator ensures that the circulator affiant understands what they are swearing to or affirming. A failure to attach a complete affidavit is grounds for invalidating an entire petition section.

Finally, the requirement of a complete notarization guarantees that the sworn or affirmed circulator affidavit is complete and valid and sworn to and signed in the Notary's presence.

All of these requirements are in place to prevent voter fraud. Each reinforcing the other. It is understood that petitions are circulated out of the presence of those that may wish to challenge signature lines, and are therefore designed to uncover unlawful circulation and completion. Without these requirements, there would be no reason to require a certain minimum number of valid signatures. If a series of indiscernible squiggles constitutes a valid line, then the minimum number of elector signers has no purpose. And, if there is evidence on the face of the petitions that they were improperly completed, that evidence must lead to invalidation of that line or even entire section.

The following are the specific categories and basis for challenged sections, pages, and lines that support this protest.

1. Lines containing illegible information that must be excluded. Signature validation cannot be reverse engineered. If the name is illegible, searching by address and then arguing that some registered voter at that address could potentially match an illegible name is not permitted. The handwriting of the name and its legibility on the petition has not changed because of ancillary searches. Voters are required to print names so that anyone can recognize the named individual and then proceed to determine if that person is a registered voter, and whether they are registered at that specific written address. Similarly, an illegible address can not be accepted simply because a printed name can be found in the voter database. The law is very simple and very clear, legible names and addresses that match the official voter file are permitted, but illegible writing is not made legible because of an extrinsic guess. Looking to another line in the same petition in an attempt to match an illegible line should also not be permitted. Indeed, similar information on consecutive lines can in fact be evidence that the elector did not complete the information in their own proper person, and that separate category of objections are detailed below.

Section #	Page #	Line #	Name	Addr	City	Zip	Date
1	1	2	X				
1	3	25				X	
1	3	30				X	
2	4	31				X	
2	4	32		X		X	
2	4	33	X				
2	4	36	X				
2	4	37		X			
2	4	39					X
2	5	41	X				

2	6	53				X	
2	6	56	X				
2	7	61	X				
2	7	62	X				
2	7	68	X				
2	8	78	X				
2	8	79	X				
2	9	84	X	X			
2	9	85		X			
2	9	86	X			X	
3	2	14	X				
3	2	15	X	X			
3	2	17		X			
3	3	23	X			X	
3	3	25	X				
3	3	26	X				
3	4	33	X				
3	4	37	X	X			
3	5	49	X				
3	6	59	X				
3	6	60	X				
3	7	65	X	X		X	X
3	7	67	X				
3	9	82	X				
3	9	89	X	X			
3	10	96	X	X			
3	10	97	X			X	
4	1	6	X			X	
4	1	8	X				
4	4	35	X				
4	5	43		X			
4	5	50	X				

4	6	52	X	X	X	X	
4	6	56	X				
4	7	65		X			
4	7	66				X	
4	8	76	X				
4	9	82	X			X	
4	10	97	X	X			
5	1	1	X				
5	3	29	X			X	
5	4	37		X		X	
5	5	41	X				
5	5	46		X			
5	6	53	X			X	
5	8	74	X				
5	9	84	X			X	
5	10	93	X				
5	10	95	X				
5	10	98	X	X			
6	1	3	X				
6	2	16	X				
6	2	18	X				
6	3	29	X				
6	4	40	X				
6	8	72	X				
6	8	79	X			X	
7	1	1	X				
7	2	16	X			X	X
7	2	18	X	X			
7	3	30	X	X		X	
7	6	52	X				
7	6	54	X	X			
7	8	73	X				

7	8	74	X				
8	1	5	X	X			
8	2	11	X				
8	4	38		X			
8	7	64				X	
8	9	82	X				
8	9	87	X				
8	10	92	X				
9	2	17			X	X	
9	3	30	X	X		X	
9	4	31	X				
9	4	37	X	X			
9	5	50		X			
10	2	15					X
10	2	20	X	X			
10	3	27	X				
10	7	63	X	X		X	
10	7	64	X				
10	7	65	X			X	
10	8	71	X				
10	9	85	X	X			
11	3	22	X				
11	3	25	X				
11	5	49	X				
11	7	64	X				
11	7	70	X				
11	8	73	X	X			
11	9	81	X				
11	9	87	X				
11	10	91	X				
12	2	11	X				
12	3	27	X				

12	4	33	X				
12	5	42	X				
12	7	67		X			
12	8	72	X				
12	8	73			X	X	
12	8	74				X	
12	10	96	X				
12	10	100	X				
13	1	10		X			X
13	2	17	X				
13	3	23	X				
13	3	26	X				
13	3	29	X				
13	3	30	X				
13	4	33	X				
13	4	39	X				
13	5	44	X		X		
13	5	46	X				
13	5	48		X			
13	6	55	X				
13	6	59				X	
13	7	63	X	X	X		
13	8	74		X			
13	8	76	X			X	
13	9	87	X	X		X	
13	10	93	X				
13	10	96		X			
13	10	100		X		X	X
14	1	5	X				
14	1	6				X	
14	2	14	X				
14	2	20	X	X	X	X	X

14	3	24	X				
14	4	37				X	
14	4	38		X			
14	5	43	X				
14	10	96	X	X			
15	1	5		X			
15	1	6	X				
15	1	9	X				
15	2	12	X				
15	2	13	X	X			
15	2	15	X	X			
15	3	30	X				
15	4	39		X			
15	4	40	X				
15	5	45	X	X	X		
15	6	51	X				
15	6	53	X				
15	6	56	X				
15	6	60	X			X	
15	7	65	X				
16	1	1	X	X			
16	2	12	X	X			
16	3	23	X				
16	3	27	X				
16	3	30	X				
16	4	32	X	X			
16	5	41		X			
16	5	44	X				
16	5	46	X				
16	6	52					X
16	7	63	X	X		X	
16	7	66				X	

16	8	75	X				
17	1	4	X			X	
17	1	6				X	
17	2	12	X				
17	2	17	X				
17	3	29	X				
17	4	33		X			
17	4	36	X				
17	4	37	X				
17	4	38	X				
17	4	39	X				
17	4	40	X				X
17	5	44		X			
17	5	46	X				
17	6	53	X				
17	6	57					X
17	7	62	X	X			
17	8	79	X				
17	9	82	X				
17	9	88	X	X	X	X	X
17	10	94				X	
18	2	12				X	
18	2	16					X
18	2	20	X				
18	3	21	X	X		X	
18	3	27	X				
18	3	28	X				
18	5	43					X
18	5	46	X				
18	5	48	X				
18	6	57	X	X			
18	7	64	X			X	

18	7	66	X	X			
18	8	80	X				
18	9	81	X				
18	10	97	X	X			
18	10	100	X				
19	2	16	X	X			
19	3	21				X	
19	3	24		X			
19	3	27	X	X			
19	4	32	X				
19	4	33	X	X			
19	4	36	X				
19	4	38	X	X			
19	5	48	X				
19	6	59	X	X			
19	7	63	X				
19	7	68	X				
19	7	70	X				
19	8	74	X				
19	8	75				X	
19	9	84					X
19	9	89	X				
19	10	99	X	X	X	X	X
20	2	11	X				
20	3	25	X				
20	4	32	X				
20	6	54	X	X			
20	6	55	X				
20	8	75	X				
20	8	78	X			X	
20	9	90	X				
20	10	92	X				

20	10	95	X			X	
21	3	27	X				
21	5	50	X				
21	7	61	X				
21	7	63		X			
21	7	67	X				
21	7	70	X				
21	8	72	X				
21	9	86		X			
21	9	88	X				
21	10	95	X				
22	4	32	X	X			
22	4	33	X				
22	4	37	X				
22	5	43	X	X			
22	5	46	X	X			
22	5	48				X	
22	5	50		X			
22	6	53	X				
22	6	59	X	X		X	
22	7	61	X				
22	7	67	X				
22	8	74	X	X		X	X
22	8	77	X				
22	9	83	X	X			
22	9	85				X	
22	9	86	X	X			
22	10	92		X		X	
22	10	94		X			
22	10	95		X			
23	1	1	X				
23	1	5	X				

23	2	12	X	X			
23	3	22	X				
23	5	41		X		X	
23	5	45	X		X	X	X
23	5	49	X			X	
23	6	53	X	X			
23	7	62	X	X			
23	7	63				X	
23	8	72	X				
23	8	73	X				X
23	9	83	X				
23	10	97	X				
24	1	3	X				
24	1	6	X			X	
24	2	16		X			
24	2	20	X	X			
24	3	23	X				
24	4	31	X				
24	4	35	X	X			
24	5	46		X			
24	5	48			X	X	
24	5	49	X				
24	8	71				X	
24	8	78	X				
24	9	84	X	X			
24	10	94				X	
25	4	34	X				
25	5	48		X			
25	5	49		X			
25	6	58		X			
25	7	70	X				
25	9	88	X	X			

25	10	94	X	X			
25	10	99	X				

26	1	6	X	X			
26	3	24	X				
26	3	28	X				
26	4	35		X			
26	5	42	X	X		X	
26	6	52	X				
26	6	56	X				
26	7	61	X				
26	7	69	X			X	
26	8	75	X	X		X	
26	8	76		X			
27	1	4	X				
27	1	6	X				
27	2	13	X	X		X	X
27	4	39	X				
27	6	59	X				
27	7	66	X				
27	7	67	X	X		X	
27	7	70	X	X	X		
27	8	71	X				
27	9	86	X				
28	2	15	X				
28	3	23		X		X	X
28	3	24		X			
28	4	33	X			X	
29	1	2	X				
29	4	31	X				
30	1	9	X				

30	2	14	X				
30	2	16	X				
30	2	20	X				
30	3	25	X				
30	3	26	X				
30	3	27	X				
30	3	28	X				
30	4	33	X				
30	5	43	X				
30	5	44	X				
30	6	53	X				
30	6	54		X		X	X
30	6	60	X				
30	8	77		X			
30	9	81	X				
30	9	82	X				
30	10	92		X			
31	2	14		X	X	X	X
33	1	4	X				
33	1	6	X				
33	3	22		X			
33	4	34				X	
33	4	36	X				
33	5	50	X				
33	6	58	X				
33	6	59	X	X			
33	7	61	X	X			
34	2	13	X	X			
34	4	33	X				
34	5	46	X				X
34	5	47	X				
34	6	52				X	

34	7	67	X				
34	8	71	X				
34	8	72		X			
34	8	74	X				
34	8	78	X				
34	9	81	X				
34	9	82	X	X	X	X	X
34	9	88	X				X
34	9	89	X				
34	9	90		X			X
34	10	93		X			
34	10	95		X		X	X
34	10	97		X			
35	1	1		X			
35	2	13	X	X		X	X
35	2	14	X			X	
35	5	45		X			
35	9	85		X			
35	9	89		X		X	
35	10	91	X		X		
35	10	99	X	X		X	
36	1	8	X				
36	2	11	X	X			X
36	2	12	X				
36	2	14		X			X
36	4	32		X			
36	4	39	X				
36	7	64	X	X		X	X
36	7	69	X				
36	8	71				X	
36	8	74	X	X			
36	9	81	X	X			

36	9	86	X				
36	10	92				X	
36	10	93	X				
36	10	97	X				
36	10	100	X				
37	1	4	X				
37	3	23		X		X	
37	4	35	X	X		X	
37	5	46	X				
37	6	58	X	X		X	
38	3	21	X				
39	1	2				X	
39	2	12	X				
39	3	21	X				
39	3	24	X	X			
39	3	29	X				
39	5	46	X			X	
39	6	54	X				
39	6	59	X				
39	8	71	X	X			
39	8	74	X				
39	10	98		X			
40	1	5	X				
40	1	6	X	X			
40	1	10		X			
40	2	12	X	X	X	X	X
40	4	32	X				
40	5	48	X	X	X	X	X
40	5	49	X	X		X	
40	6	52	X				
41	1	6					X
41	2	15	X				

41	2	17	X				
41	4	33	X				
41	4	39	X				
41	5	46		X		X	
41	5	48	X			X	
41	6	51	X				
41	6	55	X				
41	6	57	X				
41	8	80	X	X		X	X
41	9	89	X	X			
41	10	91	X	X			
41	10	100	X			X	
42	1	4	X				
42	2	11	X	X			
42	2	15	X	X			
42	3	21		X		X	
42	4	34	X				
42	4	35	X				
42	5	48					X
42	5	49	X				
42	6	59	X				
42	7	63	X	X			
42	8	79		X			
42	9	84	X				
42	10	96	X			X	
42	10	99	X				
42	10	100	X			X	
43	2	11		X			
43	3	24		X			
43	3	30	X				
43	4	38	X				
43	4	40	X	X			

43	6	53	X				
43	6	55	X				
43	6	58	X	X		X	
43	6	59	X	X			
43	7	67		X			
43	7	68				X	
43	8	72	X	X			
43	9	81	X			X	
43	9	84	X				
43	9	87	X				
43	10	93	X				
43	10	95	X				
43	10	96	X				
43	10	99	X			X	
44	1	3	X				
44	1	10	X				
44	3	28	X	X			
44	4	34	X				
44	4	35	X				
45	1	2	X				
45	4	35		X			
45	4	36	X	X			
46	2	17	X				
46	2	18		X		X	
46	3	21	X				
46	4	32		X			
46	4	36	X				
47	1	9	X				
47	2	20	X				
47	3	25	X	X		X	
47	6	56	X				
47	8	75	X	X			

47	8	80	X				
47	9	82	X				
48	1	1	X				
48	2	14	X				
48	2	15				X	
48	2	18	X				
48	3	27	X				
48	5	45	X	X			
48	5	50	X				
48	6	51	X			X	
48	6	56	X				
48	8	74	X				
48	8	75	X				
48	9	83		X			
48	10	93	X	X			
49	1	3	X			X	
49	2	15	X				
50	2	17	X				
52	2	11		X			
52	2	17	X				
52	3	22	X	X			
53	1	4	X				
53	1	6	X	X			
53	2	12	X	X			
53	2	18				X	
53	3	21	X				
53	4	32	X	X			
53	4	40	X				
53	5	41		X			
53	5	46	X	X			
53	7	68	X				
53	9	90	X			X	X

54	1	10				X	
54	2	13	X				
54	2	16	X				
54	2	18	X	X		X	
54	3	30	X				
54	4	35	X			X	
54	5	45	X	X			
55	2	15	X			X	
55	2	19	X	X			
55	3	24				X	X
55	3	26	X				
55	3	29	X	X			
55	4	35	X	X		X	
55	5	43	X				

2. Lines containing incomplete information that must be excluded.

Section #	Page #	Line #	Incomplete Detail
2	3	29	No printed name
2	4	33	No printed name
2	4	36	No printed name
2	5	43	City
2	6	56	No printed name
2	7	70	
2	8	74	No printed name
2	8	77	No printed name
2	9	86	Name
2	10	91	City, Date
2	10	99	
3	1	2	

3	5	42	No printed name
3	6	60	No printed name
3	7	67	Zip
3	8	75	
3	9	82	No printed name
3	9	89	No zip
3	10	97	No printed name
3	10	98	City
3	10	99	City
3	10	100	City
4	1	4	
4	2	20	Zip
4	3	23	City
4	3	27	
4	5	46	
4	5	48	Name
4	6	53	
4	9	82	No printed name
4	10	92	
4	10	97	No printed name
5	4	40	Signature
5	6	55	No zip
5	6	56	No zip
5	10	91	No zip
5	10	92	No printed name
5	10	93	No printed name
5	10	98	No printed name
6	3	24	Zip
6	3	25	No zip
6	3	29	No printed name
6	4	39	No printed name
6	5	48	City

6	5	49	City
6	9	88	Zip
6	10	92	No date
7	1	1	No printed name
7	1	8	No date
7	3	26	
7	5	43	Zip
8	2	16	Zip
8	3	24	
8	3	25	
8	3	26	No zip
8	4	40	Signature
8	5	41	
8	5	49	
9	4	37	No printed name, Zip
9	8	77	City
10	1	6	
10	2	12	City
10	6	59	
10	7	63	No printed name
10	8	71	No printed name
11	4	39	
11	9	85	
12	5	42	No printed name
12	8	72	No printed name
13	2	13	
13	3	26	Zip
13	4	38	
13	4	39	Zip
13	5	44	No printed name
13	6	53	City
13	7	63	No zip

13	8	76	No printed name
13	9	87	No printed name
13	10	98	No printed name
14	2	20	No printed name
14	5	50	
15	4	39	No zip
15	6	56	No printed name
16	4	36	No printed name, Zip
17	2	17	No printed name
17	3	21	
17	3	25	No zip
17	3	26	No zip
17	4	31	Zip
17	4	39	No printed name
17	4	40	No printed name
17	5	44	No zip
17	5	45	No zip
17	5	48	City
17	9	86	
18	2	20	No printed name
18	3	23	No date
18	3	28	No printed name
18	4	35	No zip
18	6	57	No printed name
18	8	75	No zip, No date
18	8	80	No zip
18	10	97	No printed name
18	10	100	No zip
19	1	8	No zip
19	2	15	No zip
19	4	32	No printed name
19	4	36	No printed name, No zip

19	4	39	
19	5	41	No city
19	6	59	No printed name
19	7	68	No printed name
19	7	70	No city
19	9	81	No zip
19	9	83	No zip
19	9	84	No zip
19	9	85	No zip
19	9	86	No zip
19	10	99	No printed name
20	1	6	
20	2	18	Date
20	3	25	No printed name
20	3	26	No printed name
20	4	36	City
20	4	40	
20	7	63	City
20	8	75	No printed name
20	9	81	
20	9	90	No printed name
21	1	5	
21	2	13	
21	3	25	No zip
21	3	27	No printed name
21	7	67	No printed name
21	8	80	No printed name
22	3	21	Name
22	5	46	No printed name
22	8	74	No printed name
23	1	5	No printed name
23	2	13	

23	3	26	Zip
23	4	32	
23	5	41	Zip
23	5	45	Date, City, Zip
23	7	62	No printed name
24	1	3	No printed name
24	1	10	
24	2	20	No printed name
24	3	23	No printed name
24	4	35	No printed name
24	5	45	City, Zip
24	8	72	No zip
24	9	81	No printed name
24	10	97	No city, No zip, No date
24	10	100	
25	1	3	No printed name
25	1	10	
25	2	14	No printed name
25	2	17	
25	6	52	No printed name
25	7	62	
25	7	63	No printed name
25	7	64	No printed name
25	8	72	No printed name
25	10	94	No printed name, No zip
26	2	20	No printed name
26	3	24	No printed name
26	5	48	No printed name
26	5	50	No printed name
26	6	59	No printed name
26	9	88	No printed name
26	9	89	No printed name

26	10	94	No zip
27	2	13	No printed name
27	3	24	No printed name
27	4	33	No printed name
27	7	70	No printed name
27	10	94	No printed name
27	10	95	No printed name
28	1	3	
28	1	6	
28	2	18	
28	2	20	No printed name
29	3	27	
29	3	28	
29	4	36	No zip
30	1	10	No zip
30	4	33	No printed name
30	6	58	City
31	2	13	City
31	2	16	City
31	4	31	No printed name
31	4	33	No printed name
31	4	34	No printed name
31	4	35	No printed name
32	1	4	
33	4	36	No printed name
33	6	53	
34	2	13	No printed name
34	2	14	No printed name
34	2	16	No printed name
34	5	43	
34	5	46	No printed name
34	5	47	No printed name

34	6	55	Address
34	6	59	No printed name
34	7	70	No printed name, City
34	9	81	No printed name
34	9	82	No printed name, City
34	9	84	No printed name
34	9	85	No printed name
34	10	91	Address
35	1	5	City
35	3	25	No zip
35	4	35	No printed name
35	5	41	
35	6	51	
35	7	61	City
35	10	99	No printed name
36	1	3	No city
36	1	8	Address
36	4	38	No printed name
36	7	63	No printed name
36	7	64	No printed name
36	7	66	Name
36	7	68	
36	9	87	Date
36	10	97	No zip
36	10	99	No zip
37	1	4	No printed name
37	2	14	No zip
37	2	15	No zip
37	3	24	No printed name
37	5	41	City
37	5	42	City
37	6	51	City

37	6	52	No printed name
37	6	54	No zip
37	6	58	No printed name
38	1	6	
38	1	7	
38	2	19	
39	1	4	zip
39	2	11	
39	6	51	
39	7	61	No printed name
39	7	64	No printed name
40	1	10	No printed name
40	5	48	No printed name
41	1	4	No printed name
41	1	10	No printed name
41	4	33	No printed name
41	4	36	No zip
41	4	39	No printed name
41	5	42	No printed name
41	5	47	No city
41	5	49	
41	5	50	No zip
41	6	60	City
41	7	62	zip
41	8	78	No date
41	9	89	No printed name
41	10	91	No zip
41	10	100	No printed name
42	1	7	
42	4	35	No printed name
42	5	49	No printed name
42	8	71	City

42	8	73	No printed name
42	8	74	No printed name
42	8	78	No zip
42	10	99	No printed name
42	10	100	No printed name
43	2	15	
43	2	18	No city
43	4	31	Date
43	4	32	Date
43	4	33	Date
43	4	34	Date
43	4	35	Date
43	5	46	No zip
43	5	49	Zip
43	6	59	No printed name
43	7	65	
43	8	73	
43	8	77	No zip
43	8	78	No zip
43	8	80	No printed name
43	9	81	No printed name
43	9	83	No zip
43	10	96	No printed name
44	1	10	No printed name
44	3	28	No city
45	1	7	Zip
46	2	15	Same person but different address
46	2	16	Same person but different address
46	3	21	Same person but different address
46	3	27	Zip

46	3	30	Same person but different address
47	1	3	No printed name
47	2	11	No printed name
47	4	37	Date
47	5	50	No printed name
47	6	51	No zip
47	6	52	No zip
47	6	53	No zip
47	7	62	No printed name
47	10	99	No zip
48	1	5	
48	1	9	
48	4	40	No printed name
48	5	44	No printed name
48	6	54	City
48	6	56	No printed name
48	10	95	No city
49	1	3	No printed name
49	2	15	No printed name
50	4	36	No printed name
52	2	11	No zip
53	1	6	No printed name
53	2	12	No printed name
53	3	21	City
53	3	30	No printed name
53	7	69	No zip
53	8	80	No printed name
53	9	85	No zip
53	9	88	No printed name
53	9	89	
54	1	5	No zip.

54	1	8	No printed name
54	2	18	No printed name
54	4	35	No printed name

3. Lines containing names of persons who are not registered Lakewood Electors. There are at least 289 such invalid lines.

	Section #	Page #	Line #
1	1	2	11
2	1	6	57
3	1	10	99
4	2	1	4
5	2	1	7
6	2	3	21
7	2	3	28
8	2	3	29
9	2	5	49
10	2	5	50
11	2	6	56
12	2	8	80
13	2	9	83
14	2	9	84

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15	2	10	96
16	3	4	37
17	3	5	43
18	3	5	44
19	3	7	65
20	3	10	96
21	3	10	97
22	4	1	9
23	4	5	42
24	4	7	69
25	5	3	25
26	5	5	45
27	5	8	75
28	5	9	81
29	6	2	17
30	6	3	22
31	6	4	40
32	6	6	52
33	6	6	54
34	6	6	58

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35	6	9	86
36	6	9	90
37	7	3	30
38	7	4	31
39	7	7	66
40	7	7	67
41	8	8	76
42	9	1	6
43	9	8	79
44	9	9	83
45	11	6	53
46	11	7	62
47	11	7	63
48	11	7	68
49	11	7	69
50	12	4	35
51	12	6	52
52	12	8	72
53	12	8	77
54	13	4	33

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55	13	6	51
56	13	8	74
57	14	2	14
58	14	3	21
59	14	3	22
60	15	6	52
61	15	6	53
62	16	1	7
63	16	1	8

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64	16	2	11
65	16	2	13
66	16	2	19
67	16	5	50
68	16	7	64
69	17	2	11
70	17	2	12
71	17	7	62
72	17	7	65
73	17	8	75
74	17	9	90

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75	18	1	3
76	18	3	23
77	18	5	47
78	18	6	55
79	18	7	68
80	18	8	73
81	18	9	82
82	19	1	5
83	19	2	16

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84	19	2	18
85	19	3	22
86	19	4	32
87	19	4	36
88	19	4	40
89	19	5	45
90	19	7	63
91	19	7	66
92	19	8	73
93	19	8	79
94	19	9	81

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95	19	9	87
96	20	6	51
97	20	10	93
98	21	5	48
99	21	6	52
100	21	6	53
101	21	7	61
102	21	7	69
103	21	8	77

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104	22	5	43
105	22	6	59
106	22	9	86
107	23	8	73
108	23	10	95
109	24	2	16
110	24	8	79
111	24	9	82
112	24	9	89
113	25	7	65
114	25	9	82

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115	25	9	88
116	25	10	96
117	25	10	99
118	26	1	4
119	26	2	16
120	26	2	17
121	26	3	23
122	26	4	37
123	26	8	71

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124	27	2	14
125	27	4	32
126	27	5	48
127	27	6	59
128	27	7	63
129	27	8	74
130	27	9	89
131	27	10	91
132	27	10	94
133	27	10	97
134	27	10	98

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135	28	2	13
136	28	2	14
137	29	1	3
138	29	1	4
139	29	4	33
140	30	1	2
141	30	3	23
142	30	3	25
143	30	3	26

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144	30	4	36
145	30	6	54
146	30	6	59
147	30	6	60
148	30	7	67
149	30	7	68
150	30	7	70
151	30	8	80
152	30	9	81
153	30	9	83
154	30	9	85

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155	30	9	86
156	30	10	91
157	30	10	92
158	31	1	7
159	31	3	24
160	33	1	6
161	33	1	8
162	33	2	12
163	33	3	21

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164	33	3	22
165	33	4	31
166	33	4	32
167	33	4	33
168	33	5	44
169	33	7	61
170	33	7	65
171	33	7	66
172	34	1	7
173	34	2	20
174	34	3	29

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175	34	5	44
176	34	5	47
177	34	5	48
178	34	6	53
179	34	7	67
180	34	9	81
181	34	9	82
182	34	10	91
183	35	1	5
184	35	2	14
185	35	3	25
186	35	3	30
187	35	8	71
188	35	8	72
189	35	10	99
190	36	1	10
191	36	2	15
192	36	2	20
193	36	3	25
194	36	4	35

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195	36	5	45
196	36	7	64
197	36	7	66
198	36	9	88
199	36	9	90
200	36	10	95
201	36	10	97
202	36	10	99
203	36	10	100

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204	37	3	23
205	37	3	24
206	38	3	22
207	39	3	27
208	39	6	55
209	39	7	65
210	39	8	80
211	40	2	11
212	40	2	12
213	40	2	15
214	40	2	19

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215	40	2	20
216	40	3	22
217	40	4	37
218	40	5	48
219	41	3	25
220	41	3	30
221	41	5	47
222	41	7	70
223	41	9	87

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224	42	1	4
225	42	2	11
226	42	4	31
227	42	4	36
228	42	8	73
229	42	8	74
230	42	8	75
231	42	8	76
232	42	8	79
233	42	10	95
234	42	10	96

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235	43	4	40
236	43	6	58
237	43	10	99
238	43	10	100
239	44	3	28
240	46	2	18
241	46	3	21
242	47	2	13
243	47	2	20
<hr/>			
244	47	3	27
245	47	6	57
246	47	7	62
247	47	7	67
248	47	7	68
249	47	7	69
250	47	8	73
251	48	5	46
252	48	5	49
253	48	6	52
254	48	6	55

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255	48	6	60
256	48	8	80
257	48	9	84
258	48	10	92
259	48	10	97
260	52	2	12
261	53	1	9
262	53	2	12
263	53	3	27
264	53	4	32
265	53	5	48
266	53	6	59
267	53	6	60
268	53	8	80
269	53	9	88
270	53	9	90
271	53	10	98
272	54	1	2
273	54	1	4
274	54	1	5

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275	54	1	8
276	54	2	15
277	54	2	18
278	54	3	27
279	54	4	38
280	54	5	47
281	54	5	48
282	55	1	7
283	55	2	15
284	55	2	19
285	55	3	24
286	55	3	25
287	55	3	30
288	55	4	34
289	55	4	35

4. At least 323 lines are invalid because the address written on the petition does not match the address in the voter file.

	Section #	Page #	Line #
1	1	1	5
2	1	3	29
3	1	4	36

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4	1	9	87
5	2	1	9
6	2	2	16
7	2	3	30
8	2	4	36
9	2	5	44
10	2	6	55
11	2	7	65
12	2	7	67
<hr/>			
13	2	7	68
14	2	9	85
15	2	9	90
16	2	10	91
17	2	10	92
18	4	2	13
19	4	4	33
20	4	4	34
21	4	5	44
22	4	6	60
23	4	7	64

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24	4	7	67
25	4	7	68
26	4	8	75
27	4	9	84
28	4	10	92
29	5	4	38
30	5	7	70
31	5	9	84
32	5	10	91
<hr/>			
33	6	3	24
34	7	2	18
35	7	5	45
36	7	7	62
37	7	7	69
38	7	8	79
39	7	8	80
40	9	7	65
41	9	7	70
42	9	8	71
43	9	8	73

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44	10	7	68
45	10	7	69
46	11	7	67
47	11	10	94
48	13	10	100
49	15	2	11
50	15	4	39
51	16	1	6
52	16	2	16
53	16	5	49
54	16	6	52
55	16	7	69
56	16	8	73
57	17	3	25
58	17	5	45
59	17	8	74
60	17	8	76
61	17	8	80
62	17	9	82
63	17	9	85

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64	17	10	96
65	18	1	2
66	18	3	29
67	18	5	48
68	18	7	70
69	18	8	73
70	18	8	79
71	18	9	81
72	18	10	98
<hr/>			
73	18	10	99
74	19	3	25
75	19	9	83
76	19	9	84
77	19	9	88
78	20	3	29
79	20	3	30
80	20	4	35
81	20	6	54
82	20	9	82
83	20	9	89

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84	20	9	90
85	20	10	94
86	21	4	32
87	21	8	80
88	21	9	84
89	22	5	45
90	22	7	65
91	22	7	67
92	22	8	78
93	22	8	80
94	22	9	85
95	22	10	99
96	23	5	49
97	24	1	6
98	24	5	46
99	24	7	61
100	24	7	65
101	25	5	48
102	25	6	59
103	25	9	90

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104	26	3	24
105	26	7	68
106	26	10	94
107	27	1	3
108	27	6	60
109	28	1	5
110	28	2	16
111	28	3	28
112	28	4	31
113	28	5	49
114	29	1	2
115	29	2	19
116	29	4	34
117	29	4	35
118	29	4	36
119	30	1	8
120	30	1	10
121	30	3	24
122	30	4	31
123	30	5	41

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124	30	6	58
125	30	8	77
126	30	8	79
127	30	9	84
128	30	10	96
129	30	10	97
130	31	2	13
131	31	2	15
132	31	3	23
133	31	3	28
134	31	4	38
135	31	4	39
136	32	1	3
137	33	3	28
138	33	4	36
139	33	4	37
140	33	4	39
141	33	5	43
142	33	5	49
143	33	6	55

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144	33	6	57
145	33	6	59
146	34	2	11
147	34	5	45
148	34	5	49
149	34	6	54
150	34	6	55
151	34	7	62
152	34	7	64
153	34	9	88
154	34	10	99
155	35	6	58
156	35	10	96
157	36	1	2
158	36	1	8
159	36	2	11
160	36	2	12
161	36	2	13
162	36	2	14
163	36	2	15

164	36	2	17
165	36	2	19
166	36	3	21
167	36	3	28
168	36	4	32
169	36	5	41
170	36	5	42
171	36	5	43
172	36	7	62
173	36	8	71
174	36	8	72
175	36	8	74
176	36	9	81
177	36	9	84
178	37	1	2
179	37	2	14
180	37	2	15
181	37	3	27
182	37	4	32
183	37	4	39

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184	37	4	40
185	37	5	48
186	37	6	53
187	37	6	54
188	37	6	55
189	37	6	56
190	38	2	11
191	39	1	4
192	39	3	22
193	39	3	26
194	39	7	70
195	39	9	90
196	39	10	98
197	40	3	25
198	40	3	29
199	41	1	5
200	41	1	8
201	41	2	17
202	41	2	18
203	41	3	29

204	41	4	39
205	41	5	45
206	41	6	52
207	41	6	54
208	41	8	75
209	41	8	78
210	41	8	79
211	41	9	84
212	41	9	89
213	42	1	6
214	42	1	9
215	42	2	20
216	42	3	21
217	42	3	22
218	42	3	25
219	42	3	26
220	42	3	27
221	42	3	28
222	42	3	29
223	42	4	34

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224	42	4	40
225	42	5	44
226	42	5	47
227	42	5	48
228	42	6	54
229	42	6	57
230	42	8	71
231	42	8	77
232	42	8	78
233	42	9	82
234	42	9	85
235	42	9	86
236	42	10	97
237	43	1	7
238	43	4	31
239	43	4	32
240	43	4	33
241	43	4	34
242	43	4	35
243	43	4	39

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244	43	5	46
245	43	5	49
246	43	6	55
247	43	6	60
248	43	7	64
249	43	7	66
250	43	7	69
251	43	8	72
252	43	8	77
253	43	8	78
254	43	8	79
255	43	9	81
256	43	9	82
257	43	9	83
258	43	9	89
259	43	10	94
260	43	10	96
261	44	1	1
262	44	1	2
263	44	1	7

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264	44	3	21
265	45	1	7
266	46	2	14
267	46	3	27
268	46	3	28
269	46	4	34
270	47	3	21
271	47	3	23
272	47	3	28
273	47	4	34
274	47	4	40
275	47	5	46
276	47	5	47
277	47	6	51
278	47	6	52
279	47	6	53
280	47	7	70
281	47	8	72
282	47	8	75
283	47	8	80

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284	47	9	82
285	47	9	83
286	47	9	84
287	47	9	87
288	47	10	99
289	48	1	8
290	48	2	12
291	48	2	16
292	48	3	25
293	48	3	26
294	48	4	37
295	48	4	39
296	48	6	56
297	48	8	79
298	48	9	85
299	48	9	86
300	49	1	2
301	49	1	9
302	50	1	8
303	50	4	35

304	52	1	10
305	53	1	6
306	53	2	19
307	53	4	37
308	53	6	54
309	53	7	65
310	53	7	66
311	53	8	78
312	53	9	86
313	53	9	87
314	54	1	1
315	54	2	12
316	54	2	14
317	54	2	20
318	54	4	40
319	55	1	6
320	55	2	16
321	55	3	23
322	55	3	27
323	55	4	32

5. Lines containing duplicate names that must be excluded. 80 lines are in question because individuals completed lines multiple times. There was even one person who attempted to be counted three separate times.

Invalid Pair	Section #	Page #	Line #	First Name	Middle Name	Last Name
1	34	6	59	MARIE	HELENE	ARNETT
1	34	7	63	MARIE	HELENE	ARNETT
2	13	10	96	PATRICIA	C	BERGER
2	48	7	66	PATRICIA	C	BERGER
3	30	3	28	AMANDA	MARIE	CAMACHO-H ERIVEL
3	54	3	30	AMANDA	MARIE	CAMACHO-H ERIVEL
4	34	5	50	ANITA	G	CARONNA
4	36	3	22	ANITA	G	CARONNA
5	33	5	42	DANIEL	MICHAEL	CASTRO
5	53	2	13	DANIEL	MICHAEL	CASTRO
6	8	7	62	DIANE	SUE	DUFFEY
6	28	5	42	DIANE	SUE	DUFFEY
7	25	4	33	SELWYN	MELISSA	EDWARDS
7	25	4	34	SELWYN	SEWELL	EDWARDS
8	10	2	18	ELIZABETH	JEANNE	FANT
8	38	3	25	ELIZABETH	JEANNE	FANT

9	2	1	10	ANTHONY	PATRICK	FINNEGAN
9	2	2	11	ANTHONY	PATRICK	FINNEGAN
10	42	9	83	JOSEPH	JOAQUIN	GARCIA
10	26	10	93	JOSEPH	LUIS	GARCIA
11	16	4	34	LOUISE	LORRAINE	GUILLAUDEU
11	38	4	33	LOUISE	LORRAINE	GUILLAUDEU
12	20	8	78	GRAHAM	FREDERICK	HAINBACH
12	20	8	79	GRAHAM	FREDERICK	HAINBACH
13	36	8	72	CHARLES		HEDIN
13	37	3	30	CHARLES		HEDIN
14	6	5	46	CATHERINE	JEAN	HOLDER
14	11	6	56	CATHERINE	JEAN	HOLDER
15	41	4	37	MARGARET	PACE	HYATT
15	47	2	19	MARGARET	PACE	HYATT
16	1	9	81	LILLIAN		KRAEMER
16	3	8	74	LILLIAN		KRAEMER
17	23	3	30	JEFFREY	CLINTON	LEMONS
17	23	4	31	JEFFREY	CLINTON	LEMONS
18	34	10	95	DON	LEON	LESOVSKY
18	36	5	49	DON	LEON	LESOVSKY

18	37	2	14	DON	LEON	LESOVSKY
19	36	5	48	LINDA	S	LESOVSKY
19	37	2	15	LINDA	S	LESOVSKY
20	42	9	90	ANGELO		MASCARENH AS
20	42	10	100	ANGELO		MASCARENH AS
21	39	8	77	TIMOTHY	M	MCCAULEY
21	45	2	18	TIMOTHY	M	MCCAULEY
22	6	4	37	JAMES	DAVID	MEDINA
22	43	3	24	JAMES		MEDINA
23	34	10	96	HELGA	KLEIN	MURPHY
23	36	5	50	HELGA	KLEIN	MURPHY
24	5	4	36	CYNTHIA	MARIE	PARKINSON
24	46	4	35	CYNTHIA	MARIE	PARKINSON
25	5	4	35	SARAH	JANE	PARKINSON
25	46	4	36	SARAH	JANE	PARKINSON
26	12	4	38	TONYA	RAE	PAYNE
26	25	2	12	TONYA	RAE	PAYNE
27	4	1	3	FRANCES	ROSE	SCHILLER
27	45	1	8	FRANCES	ROSE	SCHILLER
28	36	7	70	STEVEN	WAYNE	SCHMIDT

28	37	4	31	STEVEN	WAYNE	SCHMIDT
29	12	1	7	KELSEY	ANN	SCUDERI
29	37	2	18	KELSEY	ANN	SCUDERI
30	12	1	8	MATTHEW	JOSEPH	SCUDERI
30	44	3	26	MATTHEW	JOSEPH	SCUDERI
31	4	10	91	ROBIN	L	SCULLY
31	54	2	12	ROBIN	L	SCULLY
32	15	1	8	FRANCES	ANNA	SPATAFORA
32	25	4	31	FRANCES	ANNA	SPATAFORA
33	31	2	20	VICKY	LEE	SPELMAN
33	31	3	21	VICKY	LEE	SPELMAN
34	7	7	61	DAVID	BROOK	STEARNS
34	38	3	26	DAVID	BROOK	STEARNS
35	47	5	46	THOMAS	JUDE	STRALEY
35	53	3	22	THOMAS	JUDE	STRALEY
36	16	3	29	CAROLYN	MARGARET	STRAND
36	26	1	7	CAROLYN	MARGARET	STRAND
37	30	4	37	MARY	ALICE	WILLIAMS
37	35	2	13	MARY	ANN	WILLIAMS
38	25	1	9	ELLIS	RICHARD	WONNER

38	25	2	16	ELLIS	RICHARD	WONNER
39	53	7	66	MAREN	KRISTINA	WOOD
39	54	5	45	MAREN	KRISTINA	WOOD
40	54	5	49	ANN	LINDA	ZACHRICH
40	55	4	31	ANN	LINDA	ZACHRICH
41	4	10	92	MARIA	ROSE	ZINK
41	4	10	93	MARIA	ROSE	ZINK

6. Lines containing altered entries without proper initialing that must be excluded.

Section #	Page #	Line #	Name	Addr	City	Zip	Date	Signature	Circulator Initial
2	4	35			X				
2	5	47		X					
2	9	85		X					
2	10	93						X	
3	10	97	X			X			
4	1	9		X					
4	5	41				X			
4	6	60					X		
4	9	81	X	X					
5	1	9	X						
5	2	15	X						
5	4	32						X	
5	8	78	X						X
6	2	12	X						

6	3	28	X						
6	6	57		X					
6	7	70		X					
6	8	71		X					
6	8	72		X					
6	9	85		X					
6	9	87			X				
7	4	40		X					
8	1	5						X	
8	2	14					X		
8	5	50						X	
8	8	71				X	X		
8	10	94						X	
9	2	17			X				
10	2	11		X					
10	10	98	X						
11	5	48		X					
13	3	26	X						
13	4	36			X				
13	8	71			X				
13	8	72	X						
13	10	91			X				
13	10	92			X				
13	10	93			X				
14	2	17		X					
14	5	44				X			
15	7	61		X					
16	3	21			X				
16	7	62		X					
17	4	33		X					
17	10	98					X		
18	3	28				X			

18	10	99		X					
18	10	100			X				
19	7	61		X					
19	9	86	X						
20	1	7			X				
20	2	20					X		
20	5	49			X				
21	7	65	X						
21	8	71		X					
21	8	80		X					
22	1	1		X					
22	2	15	X						
22	2	19			X				
22	4	32	X						
22	4	37						X	
22	10	92		X					
24	8	80				X			
24	10	97	X	X					
25	4	32		X					
25	10	93	X						
25	10	96		X					
25	10	99		X					
26	8	71		X		X			
26	9	89					X		
27	1	10						X	
27	3	27						X	
28	5	43				X			
28	5	48				X			
34	4	38				X			
34	6	53					X		
35	9	86		X					
35	9	89			X				

36	2	12		X	X	X			
36	4	33	X						
36	9	81	X						
39	7	64	X						X
39	7	69					X		X
39	7	70		X					X
39	9	82		X					
39	10	91		X					
41	1	1			X				
41	6	56				X			
41	7	68	X	X	X				
42	3	27			X				
42	6	51	X						
42	9	86		X					
43	2	16		X					
43	5	48		X					
43	7	69		X					
44	1	9		X					
45	2	19	X						
48	4	34				X			
48	5	45	X	X					
50	2	20	X	X					
50	4	35		X					
50	4	36	X					X	
51	1	5			X				
52	1	2		X					
52	3	22					X		
53	4	32				X			
53	5	49		X					
53	6	51				X			
53	6	52		X					
53	6	59		X					

53	9	90				X			
54	4	40		X					
54	5	45		X					
54	5	50		X					
54	6	57		X					
55	4	35		X					
55	5	46		X					

7. Lines containing evidence of not being signed in their “proper persons” that must be excluded. See Colorado Constitution, Art. V, Section 1(6) requires that petitions “shall be signed by registered electors in their own proper persons only”. This was reaffirmed in the Colorado Supreme Court case of *Ritchie v. Polis*, 2020 CO 69. Most directly, the Lakewood Municipal Code requires that “Any referendum petition circulated within the city shall be signed only by registered electors by his or her own signature, after which the signer shall print his or her name, the address at which he or she resides, including street number and name, city, and the date of signing.” See 1.52.140(C).

There is substantial evidence on the face of the petitions that the same individual completed multiple lines. This is direct evidence of individuals not completing the petition line in their own proper person. It is now impossible to know whether person 1 completed information for person 2, or in some cases for person 3 or 4, or just as likely, a completely unrelated person, such as the circulator, completed multiple lines. For this reason, where there is direct evidence a person who IS NOT THE ELECTOR completed more than one line, those lines must be excluded. The only exception should be where assistance was lawfully provided and documented.

Section #	Page #	Line #
3	1	4
3	1	5
4	2	13
4	2	14
4	3	28

4	3	29
5	3	22
5	3	23
5	4	33
5	4	34
6	4	33
6	4	34
6	6	54
6	6	55
6	9	82
6	9	83
7	2	12
7	2	13
7	7	66
7	7	67
8	6	52
8	6	53
9	5	44
9	5	45
9	6	54
9	6	55

10	2	16
10	2	17
10	10	95
10	10	96
11	1	8
11	1	9
11	2	11
11	2	12
11	2	15
11	2	16
11	6	58
11	6	59
12	1	7
12	1	8
12	2	13
12	2	14
12	2	16
12	2	17
12	6	59
12	6	60
13	2	14

13	2	15
13	2	16
14	3	21
14	3	22
14	7	68
14	7	69
15	3	28
15	3	29
15	5	47
15	5	48
16	8	71
16	8	72
17	1	6
17	1	7
17	1	8
17	3	22
17	3	23
17	5	42
17	5	43
18	2	19
18	2	20

18	4	39
18	4	40
20	1	1
20	1	2
20	5	42
20	5	43
20	7	67
20	7	68
20	8	76
20	8	77
21	1	6
21	1	7
21	1	9
21	1	10
21	2	15
21	2	16
21	4	39
21	4	40
21	8	74
21	8	75
21	10	97

21	10	98
22	3	21
22	3	22
23	1	8
23	1	9
23	2	16
23	2	17
23	2	19
23	2	20
23	3	23
23	3	24
23	4	39
23	4	40
23	5	47
23	5	48
23	6	59
23	6	60
24	3	27
24	3	28
24	3	29
24	3	30

24	6	51
24	6	52
24	6	57
24	6	58
25	1	1
25	1	2
25	1	8
25	1	9
25	3	28
25	3	29
25	5	41
25	5	42
25	5	43
25	5	46
25	5	47
25	8	71
25	8	72
26	2	16
26	2	17
26	10	91
26	10	92

26	10	93
26	10	94
26	10	96
26	10	97
27	5	43
27	5	44
27	5	46
27	5	47
27	5	48
27	6	53
27	6	54
27	6	55
27	6	56
27	9	82
27	9	83
28	2	13
28	2	14
28	3	29
28	3	30
28	5	44
28	5	45

28	5	49
28	5	50
28	6	51
28	6	52
28	6	58
28	6	59
29	1	3
29	1	4
29	2	19
29	2	20
29	3	23
29	3	24
29	3	25
30	2	17
30	2	18
30	5	41
30	5	42
30	5	46
30	5	47
33	1	8
33	1	9

37	1	6
37	1	7
37	2	14
37	2	15
38	1	1
38	1	2
39	1	3
39	1	4
39	1	9
39	1	10
39	4	32
39	4	33
39	9	85
39	9	86
40	3	25
40	3	26
40	3	29
40	3	30
40	4	35
40	4	36
41	10	98

41	10	99
42	3	28
42	3	29
42	8	75
42	8	76
43	1	3
43	1	4
43	3	21
43	3	22
43	4	33
43	4	34
44	3	22
44	3	23
44	5	41
44	5	42
47	1	7
47	1	8
47	3	29
47	3	30
47	10	96
47	10	97

48	1	7
48	1	8
48	7	67
48	7	68
48	7	69
51	1	8
51	1	9
53	9	84
53	9	85
54	1	4
54	1	5
54	3	28
54	3	29

8. Petition Sections 8 and 12 have invalid circulator affidavits. The requirement to complete an affidavit is the only way that circulators can be held to the legal requirements for circulation. Requiring affidavit completion is evidence that the circulator read what they are swearing to or affirming. Without a valid circulator affidavit, the entire section is invalid. Unchallenged lines in these two sections alone result in removal of 200 lines.
  
9. The potential invalidity referenced in the previous section also raises the question of a violation under the Notary Act. CRS 24-21-525(7) states that "A Notary Public shall not perform any notarial act with respect to a record that is blank or that contains unfilled blanks in its text". The Notary cannot legally notarize the circulator affidavits for Sections 8 and 12 because the notary can not notarize an affidavit that contains unfilled blanks in its text as those do.

10. The petitioners utilized the same notary on Sections 2, 4, 5, 7, 9, 13, 14, 16, 23, 28, 31, 34, 37, 40, 44, 45, 46, 49, 50, 51, 52, 53, 54, and 55. The notary consistently failed to complete address information on all of these sections. CRS 24-21-530 requires every notary to inform the Secretary of State within 30 days of any change in address. The refusal to provide an address by the Notary would defeat the ability of the Secretary of State or Protesters to determine whether a Notary has changed their address and was no longer a valid notary. The Notary's address is therefore necessary to determine validity of the Notary's commission. This raises the possibility that all 24 petition sections were not properly notarized.
11. A particular Circulator, Joy Anderson, on several occasions improperly initialed changes to elector information. Those instances are detailed in item 5 above. This is clearly impermissible and calls into question her proper circulation throughout the sections she circulated. Ms. Anderson circulated sections 17 and 39. Unchallenged lines in these two sections alone result in removal of 152 lines.

### Conclusion

The Protesters have the burden to demonstrate a failure by the Petitioners to submit sufficient completed and verified signatures. However, Protesters must be treated fairly and equally under the law. Petitioners seek to represent only 3% of qualified Lakewood electors. Protesters represent the 97% of Lakewood electors who would bear the cost and policy implications of a special election that delays implementation of a lawful ordinance.

The City Clerk is obligated to follow the rule of law and apply it equally. Seeking a referendum to repeal a lawful ordinance passed by elected City Councilors is an extreme measure. While Petitioners have the right to pursue this extreme remedy, they do not have the right to ignore the rules governing circulation and sufficiency of petitions.

Protesters respectfully request the City Clerk issue the following order:

1. The Lakewood City Charter requires that the minimum number of valid registered voter signatures to place a referendum on the ballot is 3,636;
2. The Lakewood City Charter requires actual signature verification, not printed name verification; and
3. The petitioners failed to meet any minimum signature requirement to seek repeal of Ordinance 2025-29 because lines must be ruled invalid for any of the following legally required reasons: no signature, no legibly printed name or other required information, incomplete information, not a registered Lakewood voter, duplicate signature, lines written not in the voters' proper person, improperly altered signature lines, and affidavit and notary mistakes.

### Additional Legal References

## Lakewood City Charter

### 13.2 - REFERENDUM PROCEDURES.

- (a) All ordinances adopted by the City Council that are legislative in character shall be subject to referendum. Any ordinance necessary for the immediate preservation of the public peace, health, or safety; fixing the rate of general property taxation for any year; related to the issuance of securities; adopting the budget; making an appropriation for the ensuing fiscal year; calling for a special election; levying special assessments, or initiating improvement districts shall not be subject to referendum.
- (b) If a petition calling for a referendum of an ordinance is signed by registered electors of the City in a number at least equal to three percent of the total number of registered electors of the City on the date of the last regular municipal election, such petition may be submitted to the City Council by filing it with the City Clerk. A referendum petition shall be filed with the City Clerk prior to the effective date of an ordinance as provided in Section 7.4 (b) and (c) of this Charter.

### Lakewood Municipal Code

- 2.52.150 - Sufficiency of petitions—Referendum.
- A. No petition for referendum shall be filed with the City Clerk unless it contains the required number of signatures... The City Clerk's determination of sufficiency shall be based upon a review of the petition to find whether signatures of individuals are insufficient in the following categories:
  - 1. Address shown by signer is not located within the city limits of the City of Lakewood;
  - 2. Any signature appearing on the petition more than once, in which event all signatures of said individual shall be deleted except one;
  - 3. More than one individual signature on a signature line, in which event the line shall count as one;
  - 4. Signature lines containing incomplete information or information which was not completed by the elector or a person qualified to assist the elector shall not be counted;
  - 5. Signatures of individuals who are not registered electors in the city.

## VII. Rejection of Signatures or Petition Sections

### 1. Why individual signatures may be rejected

Individual signatures may be rejected for any of the following reasons:

- the signature is that of an unregistered elector;
- the signer's address or other required information does not match his/her voter registration record;
- the address the signer provided is a post office box;
- the signer did not provide the required information to sign a petition;
- the signature was dated after the circulator's affidavit was completed;
- the signature date is invalid;
- assistance was provided but no statement of such assistance accompanies the signature or mark;
- the elector's writing is illegible;
- the elector has already signed the petition (duplicate signature); or
- the signer's information appears outside of a numbered signature block on a petition section.

[1-4-904, C.R.S.]

[1-12-108, C.R.S.]

[1-40-111, C.R.S.]

[Rule 15.1.4(d) (PDF)]

### 2. Why a petition section may be rejected

The entire petition section may be rejected for any of the following reasons:

#### a. Incomplete or invalid circulator's affidavit

During the verification process, the circulator's affidavit will be checked for each petition section to ensure validity. A signed, notarized, and dated circulator affidavit must be attached to each petition section. The affidavit must be completed in accordance with Article 4, Article 12, & Article 40, Title 1, C.R.S. and SOS Election Rule 15.

Any petition section that lacks a valid and complete notarized affidavit will be rejected.

[1-4-905(3), C.R.S.]

[1-12-108(6)(j), C.R.S.]

[1-40-111(2)(c), C.R.S.]

[Rule 15.1.3 (PDF)]

**b. Incomplete or invalid notary clause**

The notary clause at the end of the affidavit will be checked for each petition section. The entire petition section will be rejected if:

- required information is missing;
- the dates on the notary clause and circulator affidavit do not match; or
- the notary is not a current/valid notary with an active commission on file with the office of the Secretary of State.

[1-4-905(2)(b)(II), C.R.S.]

[1-12-108(6)(f), C.R.S.]

[1-40-111(2)(c), C.R.S. & 1-40-130(1)(e), C.R.S.]

[Rule 15.1.3 (PDF)]

**c. Disassembly of a petition section**

A disassembled petition section will be invalid. For example, if the circulator affidavit has been separated from the signature pages, the petition section and all signatures on that section will be rejected.

[1-4-905(2)(a), C.R.S.]

[1-12-108(8)(b), C.R.S.]

[1-40-113(2), C.R.S.]

**d. Circulator's absence in the event of a protest**

A petition circulator must be available to provide testimony in the event of a protest if the petition is challenged on the grounds of circulator fraud as defined in section 1-40-111(3)(a), C.R.S. If the circulator is not available, the petition section may be rejected.

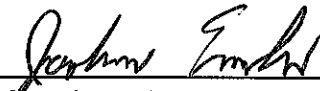
However, the petition section will not be rejected if the circulator is absent because he/she:

- has died;
- has become mentally incompetent; or
- has become medically incapacitated and physically unable to testify by any means whatsoever.

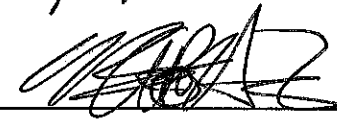
[1-4-905(4)(b), C.R.S.]

[1-12-108(6)(g), C.R.S.]

[1-40-111(3)(b), C.R.S.]

Signed   
Joshua Comden, Ph.D

Date 12/8/25

Signed   
Reverend Benjamin David Hensley

Date 12/8/25

#### Attachment A

##### Complete Analysis of Minimum Number of Required Signatures

1. Section 13.2 (b) of the Lakewood City Charter requires that a petition calling for a referendum of an ordinance must be "signed by registered electors of the City in a number at least equal to three percent of the total number of registered electors of the City on the date of the last regular municipal election."
2. The date of the "last regular municipal election" preceding the City Council's passage of Ordinance O-2025-29 was November 7, 2023.
3. The Lakewood City Clerk determined that 3,517 valid signatures are required for a petition for a referendum of Ordinance 2025-29 to be deemed sufficient.
4. This threshold of 3,517 signatures implies that the City Clerk determined that there were at least 117,201 but not more than 117,233 "registered electors of the City" on November 7, 2023, because any number in that range, multiplied by three percent, and rounded up to the next whole number of persons, equals 3,517.
5. The Jefferson County Clerk and Recorder is responsible for maintaining the official list of registered electors within the City.

6. The Protestors filed an Open Records Request with Jefferson County Clerk and Recorder, requesting a list of the registered electors within the City of Lakewood on November 7, 2023, and a count of the number of confidential electors registered in Lakewood on that same date, who, under state law, would not appear on the publicly available voter registration list.
7. The County Clerk and Recorder Office responded that they do not keep a record of the voter list as it was for every single day in the past, and that a record of the voter list on November 7, 2023 no longer exists. The closest date to November 7, 2023 for which a copy of the complete voter list for all of Jefferson County, and a count of the confidential voters by precinct for the entire county was available is on November 1, 2023. A copy of the voter list for the entire county, but not the count of confidential voters, was also available for December 4, 2023. The County provided all of these documents to the Protestors.
8. According to the official database provided by the County, on November 1, 2023, there were 460,354 registered electors in all of Jefferson County. Each entry in this database includes fields for – amongst many other pieces of information – the elector’s name, address, precinct, initial registration date, and a field for “Municipality.” Filtering the database by the “Municipality” field to only show voters who reside within the corporate limits of Lakewood yields a list of 119,362 registered electors.
9. According to the count of confidential voters provided by the County, on November 1, 2023, there were 7,893 registered confidential voters, spread across 296 precincts countywide, whose confidential status means that they are not included in the publicly available list of 460,354 names of registered Jefferson County electors. Filtering this confidential voter count to include only the precincts that are located within the corporate limits of Lakewood results in a count of 1,833 confidential voters within the City.
10. Therefore, according to official data from the County Clerk and Recorder, on November 1, 2023, which is the closest date to the November 7, 2023 municipal election for which complete data is now available, there were 119,362 named registered electors within Lakewood, plus 1,833 confidential registered electors

within Lakewood whose names and addresses are not publicly available, for a total of 121,195 registered electors.

11. According to the official December 4, 2023 voter list from the County, when filtered in a similar way to the November 1, 2023 database to include only Lakewood voters, there were 119,455 registered electors in Lakewood. This is a net increase of 93 non-confidential voters from the previous month.
12. By examining the initial registration date of Lakewood electors in the December 4 database, one finds 357 people who registered to vote between November 1 and November 7, 2023, and zero people who registered to vote after November 7 but before December 4, 2023. This means that there were 357 newly registered Lakewood voters by November 7 who were not present in the November 1 database.
13. There are 264 Lakewood electors whose names appear in the November 1, 2023 database but had been removed from the December 4, 2023 database. It is not possible from the data that the County has maintained a record of to know the exact date or reason that any of these 264 electors were removed from the voter list – only that they were removed at some point in time between November 1 and December 4, 2023.
14. The registration of 357 new Lakewood voters and the removal of 264 Lakewood voters from the list perfectly explains the net increase of 93 voters during the November 1 to December 4, 2023 time period. This represents a statistically very small net increase in the number of non-confidential Lakewood voters of only 0.08% between November 1, 2023 and December 4, 2023.
15. It is no longer possible to precisely know, based on the official data from the County Clerk and Recorder, the exact number of registered electors in Lakewood on November 7, 2023, “the date of the last regular municipal election,” because the County has failed to keep a record of such information. What is possible to know is that there were 357 newly registered voters by November 7 compared to November 1, and even if every one of the 264 people removed from the voter list between November 1 and December 4 were removed before November 7, there would have been at least 119,455 non-confidential registered electors on November 7, just as there were on

December 4. There could have been up to 119,719 non-confidential on election day if any of the 264 people removed from the voter rolls were removed after November 7, but there cannot have been any fewer than 119,455 non-confidential voters on the date of the election.

16. No record exists of the number of confidential voters on November 7, 2023, or any reasonably close date thereafter, but given the very small percentage change in the number of non-confidential voters between November 1 and December 4, 2023, it is not plausible to believe that any increase or decrease to the number of confidential voters between November 1 and November 7 could have been very significant. The best available estimate for the number of confidential voters in Lakewood on November 7, 2023 is the official count of the number of confidential voters in Lakewood precincts on November 1, 2023, which is 1,833 confidential voters.

17. Therefore, the best estimate for “the total number of registered electors of the City on the date of the last regular municipal election” is the minimum of 119,455 non-confidential voters known to have been registered on November 7, 2023, plus 1,833 confidential voters who were known to be registered on November 1, 2023, which equals 121,288 registered electors. This is a conservative estimate because it assumes that all 264 people who were removed from the voter list on an unknown date between November 1 and December 4, 2023 were removed on or before November 7. If any of those people were removed from the voter list after November 7, then the true number of registered electors in Lakewood on election day was even higher.

18. Three percent of 121,288 registered electors, rounded up to the next whole person, equals 3,639 valid signatures required for a referendum petition.

19. Therefore, the City Clerk erred in calculating only 3,517 valid signatures as the minimum threshold for a valid petition of Ordinance 2025-29.

20. Based on the above provided calculations derived from the official voter registration data from the Jefferson County Clerk and Recorder, the correct number of required signatures is at least 3,639.

21. The Protestors respectfully request the City Clerk to find that a minimum of 3,639 valid signatures are required for Ordinance 2025-29 to be deemed sufficient.