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Colorado Secretary of State

COLORADO TITLE SETTING BOARD

IN THE MATTER OF THE BALLOT TITLE AND SUBMISSION CLAUSE FOR
INITIATIVE 2019-2020 #182

MOTION FOR REHEARING

On behalf of Tyler Sandberg, a registered elector of the State of Colorado, the undersigned counsel hereby submits this Motion for Rehearing of the Title Board's February 5, 2020, decision to set the title of 2019-2020 Initiative #182 ("Initiative"), pursuant to C.R.S. § 1-40-107, and as grounds therefore states as follows:

I. The Initiative contains multiple subject in violation of the single-subject requirements.

The Initiative at least three distinct and separate purposes:

- A. The Initiative addresses prior voter approval for a new state tax or state tax rate increase;
- B. The Initiative addresses prior voter approval for a new local tax or local tax rate increase; and
- C. Eliminates the requirements in Article X, Section 20 of the Colorado Constitution requiring voter approval of new state taxes and state tax rate increases in any other circumstance.

II. The Initiative title is unclear and misleading.

This title fails to explain that the Initiative provides an exception to Article X, Section 20 of the Colorado Constitution and allows revenue increases through the enactment of policy changes that currently require voter approval or are otherwise prohibited. The title is misleading because it should notify voters that the Initiative alters the existing voter approval requirement, and it should refer to Article X, Section 20 of the Colorado Constitution.

Accordingly, the Objector respectfully requests that this Motion for Rehearing be granted and a rehearing set pursuant to C.R.S. § 1-40-107(1).

Respectfully submitted this 12th day of February, 2020.

MAVEN LAW GROUP

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