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S. WARD
2:35 P.M.

COLORADO TITLE SETTING BOARD

Colorado Secretary of State

IN RE THE MATTER OF THE TITLE AND BALLOT TITLE AND SUBMISSION CLAUSE
FOR INITIATIVE 2015-2016 #100

MOTION FOR REHEARING

On behalf of Carrie Ann Lucas, Anita Cameron and Julie Farrar, registered electors of the State of Colorado, the undersigned hereby submits this Motion for Rehearing on Initiative #100, and as grounds therefor states as follows:

The Initiative Violates the Single Subject Rule

In addition to its stated purpose of medical aid in dying, the Initiative also:

1. Creates a new class of protected persons under the Constitution referred to as “citizen-sovereigns”;
2. Amends the Article II, Section 3 inalienable right of persons in “defending their lives”;
3. Creates a new definition of “Mental Competency”; and
4. With no definition of “medical protocol” and immunity for any person or group assisting in medical aid in dying, the measure applies to assisted death by any person or group in addition to a medical professional.

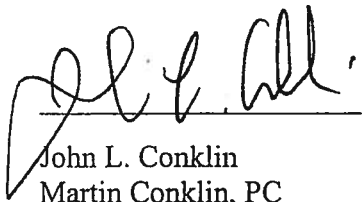
**The Title and Submission Clause Do Not Fairly Describe
the Meaning and Intent of the Measure**

The title and submission clause set by the Title Board do not fairly describe the meaning and intent of the measure in the following ways:

1. The phrase “concerning a right” in line one of the title and submission clause is misleading because it implies such a right already exists. A more accurate phrase would be “recognizing a right” or “establishing a right”;
2. The title and submission clause do not reference the newly created class of “citizen-sovereigns”; and
3. The title and submission do not reference immunity for a group assisting in medical aid in dying, which is contained in the measure.

Accordingly, the registered electors request that this Motion for Rehearing be granted and, at a rehearing conducted pursuant to C.R.S. §1-40-107, that the Title Board properly determine that it lacks jurisdiction over Initiative #100 or, if the Title Board finds it has jurisdiction, without waiver of any of the registered electors’ remedies, set a title and submission clause which fairly describe the meaning and intent of the measure.

Respectfully submitted this 13th day of April, 2016.

A handwritten signature in black ink, appearing to read "John L. Conklin", is written over a horizontal line.

John L. Conklin
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On behalf of Carrie Ann Lucas, Anita Cameron and Julie Farrar, registered electors of the State of Colorado.