

**IN RE: TITLE, BALLOT TITLE, AND SUBMISSION CLAUSE
FOR INITIATIVE 2025-2026 #324
("Congressional Redistricting Criteria")**

Kathleen Chandler and Frederick Enstrom, Objectors

v.

Colorado Title Board

MOTION FOR REHEARING

By undersigned counsel, Kathleen Chandler, a registered voter of Arapahoe County, and Frederick ("Rick") Enstrom, a registered voter of Jefferson County, Colorado, object under C.R.S. § 1-40-107(1)(a)(I) to the title set for Initiative #324.

On April 15, 2026, the Title Board Set the following ballot title and submission clause for Initiative #324:

Shall there be an amendment to the Colorado Constitution changing congressional redistricting criteria, and, in connection therewith, repealing the requirement that the independent congressional redistricting commission maximize the number of politically competitive districts; prohibiting a redistricting map that is created with partisan voter registration data or partisan electoral performance, and instead creating seven new geographic communities of interest, consisting of 50 Colorado counties, and requiring the commission to use specified priorities to keep counties, cities, and geographic communities of interest together as much as possible?

In so doing, the Board set a title that is misleading and erroneous, because the title states that it requires "the commission" to use specified priorities. But the proposed initiative is not limited to a commission, but rather the criteria apply to maps drawn by a commission, the legislature, and by initiative.

