



# DAVE YOST

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April 22, 2025

***Via Certified U.S. Mail and E-mail***

Mark Brown, Esq.  
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Re: REVISED Petition for Constitutional Amendment to add a new section 23 to Article I of the Ohio Constitution – “Protecting Ohioans’ Constitutional Rights.” Previously rejected on March 5, 2024.

Dear Mr. Brown,

On March 14, 2025, United States District Judge James L. Graham issued a preliminary injunction in *Brown v. Yost*, Case No. 2:22-cv-01401, enjoining me from “enforcing the requirement of a fair-and-truthful examination under O.R.C. § 3519.01(A) before certifying [the Petitioners] March 5, 2024 summary of the Protecting Ohioans’ Constitutional Rights amendment.” The Court further ordered me to “immediately certify [the Petitioners’] March 5, 2024 petition to the Ohio Ballot Board.” Today, the Supreme Court of the United States lifted the stay of the preliminary injunction.

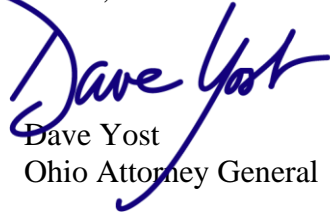
In accordance with the court order, I therefore submitted the following certification to the Ohio Secretary of State:

Without passing on the advisability of the approval or rejection of the measure to be referred, I certify the summary of the proposed amendment in compliance with the March 14, 2025 order in *Brown v. Yost*, U.S. District Court for the Southern District of Ohio, Case No. 2:22-cv-01401.

My certification of this summary is in strict compliance with the above-referenced court order. It should not be construed as my affirmation that the wording of the summary properly advises potential petition signers of a measure’s material components. Finally, my certification should not be construed as my affirmation of the enforceability and constitutionality of the proposed amendment.

The fact that the recent preliminary order enjoins me from performing my statutory duty under R.C. 3519.01(A) in this instance, does not change my previous determination that the summary is misleading. I stand by my position that Ohio voters who are asked to support a ballot initiative are entitled to a fair and truthful summary of the initiative.

Yours,

A handwritten signature in blue ink that reads "Dave Yost". The signature is stylized with a large, sweeping "D" and a cursive "Yost".

Dave Yost  
Ohio Attorney General

Cc: Committee to Represent the Petitioners