

In the Third Judicial District Court of Shawnee County, Kansas

Kristian D. Van Meteren
Plaintiff

Case No: SN 2024 CV 563

RECEIVED

vs. Scott J. Schwab
Defendant

JUN 05 2026

Kansas Attorney General

SUMMONS

To: Secretary of State Scott J. Schwab (Name)
915 SW Harrison St. (Address)
Topeka, KS 66612

A lawsuit has been filed against you.

Within (21) (30) (40) (60) days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached petition or a motion under K.S.A. 60-212. The answer or motion must be served on the plaintiff's attorney, or the plaintiff if plaintiff has no attorney, at the

following address: Kristian D. Van Meteren (Name)
15297 Brandt Rd. (Address)
Leavenworth, KS 66048

If you fail to file an answer or motion as described above, judgment by default will be entered against you for the relief demanded in the petition. You also must file your answer or motion with the court.

If you file an answer, any related claim which you may have against the plaintiff must be stated as a counterclaim in your answer. If you fail to do so you will thereafter be barred from making such claim in any other action.

Date 6/5/26



By Stacy Pletcher
Clerk of the District Court
Becky Allison
Deputy Clerk

IN THE THIRD DISTRICT COURT OF SHAWNEE COUNTY, KANSAS
CIVIL COURT DEPARTMENT

DAVID G. MILLER)
)
and)
)
KRISTIAN D. VAN METEREN)
)
Plaintiffs,)
)
vs.)
)
SCOTT SCHWAB, SECRETARY OF STATE)
STATE OF KANSAS)
)
Defendant.)

SNCO KS DISTRICT COURT
2026 JUN 5 PM 1:52:52

Case No. SN 2026 LV563
Division No. _____

APPLICATION FOR EMERGENCY INJUNCTION

Plaintiffs David G. Miller and Kristian D. Van Meteren make application for an emergency injunction against Defendant pursuant to KSA 60-903 et seq.

STATEMENT OF FACTS

1. **Plaintiffs have standing to seek injunctive relief.** Plaintiff David G. Miller is an individual, a resident of Douglas County, Kansas, and was, until an order was issued by Defendant on May 18, 2026 [**Exhibit A**], registered to vote under the No Labels Kansas (NLKS) designation established by Defendant [**Exhibit B**]. Plaintiff Kristian D. Van Meteren is a resident of Neosho County, Kansas and was, until the Defendant's order referenced above was issued, also registered to vote under the No Labels Kansas (NLKS) designation established by Defendant [**Exhibit C**]. Per KSA 25-302 and NLKS Bylaw 5(c), on May 28, 2026, Plaintiff Miller filed a properly adopted and formatted Certificate of Nomination with the Defendant's Director of Elections, along with the appropriate filing fee, for the office of Kansas Insurance Commissioner [**Exhibit D**]. On June

1, 2026, Plaintiff Van Meteren also filed a properly adopted and formatted Certificate of Nomination for the office of Kansas Secretary of State, along with the appropriate filing fee **[Exhibit E]**. Both Certificates of Nomination were reviewed by the Director of Elections and verified to be complete and in conformance with Kansas law. Checks for the filing fees were accepted by the Director and each Plaintiff was returned a stamped and verified copy of the Certificate of Nomination, along with a receipt for the filing fee. Accordingly, Plaintiffs David G. Miller and Kristian D. Van Meteren have standing to seek injunctive relief from this court on their own behalf as registered NLKS voters, on behalf of the NLKS State Executive Committee (NLKS SEC), as officers of the party, and as nominees of No Labels Kansas party.

2. **Shawnee County District Court is the appropriate venue.** Because Defendant, in his capacity as Secretary of State, represents the State of Kansas and this is primarily a matter governed by state law, Shawnee County District Court is the appropriate venue to seek injunctive relief against Defendant.

3. **Relation to Application for Emergency Injunction submitted on 5/28/26 (Case No. SN2026CV510).** This application is related to, but separate from, an Application for Emergency Injunction filed by Plaintiff Miller on May 28, 2026. As the elected Chairman of No Labels Kansas party, Plaintiff Miller filed a separate Application for Emergency Injunction on May 28, 2026 in Shawnee County District Court seeking that Defendant be enjoined from taking further action to dissolve No Labels Kansas as a recognized political party and involuntarily disaffiliate more than 7,000 voters from its rolls. In that Application, Plaintiff Miller requested that Defendant's order, issued May 18, 2026 directing such dissolution and disaffiliation, be stayed or put on hold, pending resolution of Defendant's legal standing to intervene in potential disputes over leadership of No Labels Kansas party and requesting that any action already taken by

Defendant to terminate No Labels Kansas's status as a recognized political party and alter the party affiliations of its registrants be reversed until the underlying dispute could be adjudicated. This Application for Emergency Injunction is prompted by separate, additional actions taken by Defendant in the intervening week since Case No. SN2026CV510 was filed: specifically, his attempt to disqualify Plaintiff Miller and Plaintiff Van Meteren as statewide candidates in the November 2026 general election based, again, on his intervention in matters related to NLKS leadership. Allowed to stand, Defendant's determination to bar NLKS from fielding statewide candidates in this year's elections will, per KSA 25-302b, result in the automatic and likely permanent termination of NLKS's status as a recognized political party. Should Defendant's actions to unilaterally dissolve NLKS and disaffiliate its voters from NLKS voter rolls, outlined in Case No. SN2026CV510, be overturned or reversed by this court, Plaintiff alleges that Defendant's backup strategy in declaring the Plaintiffs' candidacies invalid is to block NLKS from nominating statewide candidates in this year's general election, as required by KSA 25-302b, so that the end result is the same: **NLKS ceases to exist**. Plaintiffs view Defendant's actions as an attempt to do an end-run around a potential unfavorable ruling by this court in Case No. SN2026CV510 before that case and its underlying issues have received a hearing. Regardless of Defendant's motivations, the underlying dispute leading to the filing of this Application and Case No. SN2026CV510 is the same: Defendant's refusal to acknowledge Plaintiffs as the "valid" or "legitimate" leaders of NLKS based on his personal opinion that such is the case. Accordingly, Case No. SN2026CV510 and this Application are related but deal with two separate issues: the ability of NLKS to continue to exist as a party with which voters may affiliate despite Defendant's decree to the contrary vs. the ability for NLKS to nominate candidates per KSA 25-302 and, thus, not be subject to automatic termination provisions contained within KSA 25-302b. As a result of

Defendant's additional actions targeting Plaintiffs and NLKS in the three days between the filing of Case No. SN2026CV510 (May 28, 2026) and the letters Plaintiffs received on June 1, 2026 rejecting their candidacies, this Application for Emergency Injunction is submitted as a separate pleading. Without objection by Plaintiffs, it may, at the court's discretion, be combined with Case No. SN2026CV510, which is now scheduled to be heard at 10:00 AM on June 11, 2026.

4. **Time is of the essence.** Because KSA 25-308(1) stipulates that objections to nomination rejections must be submitted within three days of the issuance of notification of such rejections; because Defendant is solely empowered by KSA 25-308(2)(d) to, at his discretion, call meetings of the State Objections Board and set meeting dates and times to resolve disputes involving statewide candidates; because KSA 25-308(2)(d) further requires that disputes arising from objections filed by statewide candidates be decided by the State Objections Board within five days following issuance of a notice by the Defendant calling for the State Objections Board to meet; and because KSA 25-308(2)(c) specifies that "The decision of a majority of these officers **shall be final**;" Plaintiffs seek this separate emergency injunction to bar Defendant and the State Objections Board from considering Plaintiffs' objections prior to the underlying issues being heard and addressed by this court, specifically Defendant's legal standing to intervene in matters or potential disagreements related to leadership of political parties.

5. **Timeline of events spurring this Application.** On May 8, 2026, in response to an inquiry regarding the legal and technical sufficiency of a proposed Certificate of Nomination submitted by Plaintiff Miller, Defendant issued a letter stating, "the Secretary of State will not accept, process, or recognize any political party filings submitted by you or anyone affiliated with any of the above-referenced corporations purporting to be on behalf of 'No Labels Kansas,' the recognized political party." **[Exhibit F]** As outlined in Case No. SN2026CV510, Defendant then issued an order, based on nothing more than a request from Republican political operative, terminating NLKS's status as a recognized political party and directing

county election officials to immediately alter the affiliation of more than 7,000 Kansas voters from “No Labels Kansas” to “Unaffiliated.” In spite of Defendant’s May 8, 2026 letter and his May 18, 2026 order, on May 28, 2026 Plaintiff filed a Certificate of Nomination for the office of Insurance Commissioner which was properly adopted by a caucus authorized by NLKS Bylaws, Section 5 **[Exhibit G]**. Upon filing, said Certificate of Nomination was reviewed by Defendant’s Director of Elections, deemed legally and technically sufficient, and accepted by the Director, along with a \$670 filing fee. On June 1, 2026, Defendant Van Meteren filed a Certificate of Nomination for the office of Secretary of State which was also properly adopted by a caucus authorized by NLKS Bylaws, Section 5. Upon filing, said Certificate of Nomination was again reviewed by Defendant’s Director of Elections, deemed legally and technically sufficient, and accepted by the Director, along with a \$670 filing fee. Per KSA 25-305, the statutory deadline for NLKS to file candidates to appear on the November 2026 general election ballot expired at noon on Monday, June 1, 2026. In Case No. SN2026CV510, Plaintiff Miller seeks an extension of that deadline so that NLKS may conduct a planned nominating convention, rendered impossible to execute prior to the statutory filing deadline as a result of Defendant’s actions. At 2:33 PM, on June 1, 2026 Defendant emailed a letter to Plaintiff Miller stating, “After review, I have determined that the certificate of nomination is not valid and cannot be accepted.” **[Exhibit H]** A similar letter was emailed to Plaintiff Van Meteren one minute later, at 2:34 PM **[Exhibit I]**. The following explanation was offered by Defendant for his decision to declare the Certificates of Nomination filed by Plaintiffs to be “not valid:”

“On May 8, 2026, the Office of the Secretary of State determined that the No Labels Kansas Party was no longer a recognized political party in Kansas. Accordingly, at the time the certificate of nomination was submitted, the organization identified in the filing was not a recognized political party authorized to nominate candidates pursuant to K.S.A. 25-302. Moreover, the leadership of the No Labels Kansas Party that was legitimately recognized by this office back in 2024 has confirmed that you are not, and never have been, an officer of that party and have no authority to act on its behalf.”

The letter, though in error regarding the date of the Secretary’s aforementioned determination (issued on May 18, 2026, not May 8, 2026), indicated that the Plaintiffs could file an objection to the Defendant’s determination by 5:00 PM Thursday, June 4, 2026, and that said objections would

be considered by the State Objections Board, comprised of the Defendant, Attorney General, and the Lt. Governor or their designees. On June 4, 2026 at approximately 2:30 PM, Plaintiffs each hand-delivered formal letters of objection **[Exhibits J, K]** to Defendant's Director of Elections who returned a date-stamped copy of the first sheet of each letter to Plaintiffs, indicating that the objections had been filed. Asked about the expected timeline for a meeting of the State Objections Board, the Director indicated that such a meeting would likely be held "sometime next week" (June 8-12, 2026). Plaintiffs then hand-delivered copies of their letters of objection to the offices of the Lt. Governor and Attorney General. Upon returning home from hand-delivering his letter of objection, Plaintiff Miller discovered an email exchange between this court and a representative of the Attorney General, who will be representing Defendant in Case No. SN2026CV510, proposing that an initial hearing regarding that action be held at 10:00 AM on Thursday, June 11, 2026. Plaintiff Miller agreed to that proposed hearing time and date.

6. **Given events since the filing of Case No. SN2026CV510, this Application for Emergency Injunction is justified and it is urgent.** Per the timeline set forth above which notes that a hearing in Case SN2026CV510 is now scheduled for 10:00 AM on Thursday, June 11, 2026 and the Director of Election's statement that a meeting of the State Objections Board would occur "sometime next week," Plaintiff argues that this Application for Emergency Injunction is warranted to postpone any consideration or final judgment by the State Objections Board regarding the objections filed by Plaintiffs on June 4, 2026 until the dispute underlying both Case No. SN2026CV510 and this Application (the Defendant's legal standing to intervene in party leadership matters) is addressed by this court. KSA 25-308(2)(c) stipulates, "In the case of nominations of national and state officers, objections shall be filed with the secretary of state and shall be considered by the lieutenant governor, secretary of state and attorney general, or such

officer's designee, and a decision of a majority of these officers, or such officers' designees, **shall be final.**" KSA 25-308)(d) states, "Such time [for a meeting of the State Objections Board] **shall not be more than five days following the giving of such notice** in the case of nomination of a national or state officer." Plaintiffs note, however, that the Defendant could issue said notice for a meeting to occur at any time within that five-day window including dates and times between the filing of this Application and the scheduled hearing before this court at 10:00 AM on Thursday, June 11, 2026. Plaintiffs further argue that, if the Defendant's disqualification of Plaintiffs' Certificates of Nomination is sustained by the State Objections Board prior to this court having had an opportunity to determine Defendant's standing to personally intervene in internal party matters to justify carrying out an official act disqualifying Plaintiffs' candidacies, the underlying damage to the constitutionally guaranteed freedoms of speech and association to Plaintiffs, NLKS registrants, and all Kansas voters outweighs the state's interest in securing a decision by the State Objections Board within the five-day window prescribed by KSA 25-308(d). Thus, Plaintiffs pray that this court consider granting this emergency injunction *ex parte* to prevent Defendant from thwarting this court's ability to hear, consider, and rule on the fundamental controversy underlying this dispute: whether the Defendant has any legal standing to personally or officially intervene in internal party matters and then execute official acts with far-reaching constitutional impacts based on that intervention.

7. **No injury to Defendant or the public interest.** The injury posed to Plaintiff and NLKS party registrants outweighs whatever damage the proposed injunction may cause Defendant. The issuance of an injunction against Defendant will not harm Defendant and will not be adverse to the public interest. There is no urgency justifying a hasty decision by the State Objections Board regarding this matter. In an email to this court, Defendant's General Counsel

notes, “There is no critical need for a hearing [in Case No. SN2026CV510] on short notice, as general election ballots are not prepared until the first week of September.” Plaintiffs’ names, if their candidacies are allowed to proceed, will be placed on the general election ballot referenced in that statement. Accordingly, there is no logical justification for rushing the State Objections Board to consider and decide this matter before this court has had a chance to hear, consider, and rule upon the fundamental issues underpinning this dispute.

8. **Relief sought.** Plaintiffs pray for judgment in their favor and for the Court to enjoin Defendant and the State Objections Board from considering Plaintiffs’ objections until such time as this court has had an opportunity to hear and rule upon the Defendant’s authority to intervene in internal party matters and execute official actions based on that intervention. Plaintiffs pray that, in the interest of justice, if such a notice has already been issued by Defendant prior to this court having had an opportunity to rule on this Application, that the court extend the five-day deadline prescribed in KSA 25-308(d) for consideration of Plaintiffs’ objections until such time as the court has heard, considered, and ruled upon the fundamental issue underpinning this dispute: Defendant’s legal standing to intervene in an intra-party matter, based on that intervention, disqualify Plaintiffs’ Certificates of Nomination. Plaintiff further prays the Court to award Plaintiff actual damages, attorney’s fees, and expenses, court costs, and any further relief the Court deems just and proper.

Respectfully submitted,

DAVID G. MILLER, CHAIRMAN
CANDIDATE - INSURANCE COMMISSIONER

BY: *David G. Miller*
David G. Miller, Plaintiff Pro Se
PO Box 3073, 2901 Atchison Circle
Lawrence, KS 66046
Office: (913) 349-2268 | Cell: (785) 542-3458
chairman@nolabelskansas.com

KRISTIAN VAN METEREN, VICE CHAIRMAN
CANDIDATE - SECRETARY OF STATE

BY: *Kristian D. Van Meteren*
Kristian D. Van Meteren, Plaintiff Pro Se
3800 120th Road
Thayer, KS 66776
Office: (913) 349-2268 | Cell: (785) 307-6720
krisv@singularisgroup.com

SUBSCRIBED AND SWORN TO, before me, a notary public, or deputy Clerk, this 5
Day of June, 2026 - Edward S. Terry

Palchay Allison
Deputy Clerk

I certify that on the 5th day of June, 2026, AD.
I filed the foregoing with the Shawnee County Clerk
of the Court and a copy will be delivered via hand-
delivery or electronic mail to:

Secretary of State Scott J. Schwab
Attn: Clayton Barker, General Counsel
Docking State Office Building
915 SW Harrison Street
Topeka, KS 66612
Office: (785) 296-4564 | Fax: (785) 294-3051
clay.barker2@ks.gov | clay.barker@sos.ks.gov





SCOTT SCHWAB

EXHIBIT A - P. 1 of 1

KANSAS SECRETARY OF STATE



- Businesses
- Elections
- Publications
- General Services
- Lobbyist
- Media
- About

Press Release



No Labels Kansas Terminates Its Status as Political Party in Kansas

Monday, May 18, 2026

TOPEKA – At the request of No Labels Kansas, the office of the Kansas Secretary of State terminated its status as an officially recognized political party in the state.

No Labels Kansas was officially recognized as a political party in January 2024 after their petition was approved by the Secretary of State. The party notified the Secretary of State's office on Friday, May 15, of its desire to terminate its status in Kansas.

Counties have been directed, pursuant to state law, to change voter registration records with the No Labels Kansas party to an unaffiliated party affiliation.

Please see attached the [No Labels letter](#) and click [HERE](#) to access voter registration statistics.

###



Kansas Secretary of State

📍 Docking State Office Building
915 SW Harrison Street
Topeka, KS 66612

📞 785-296-4564

✉️ kssos@ks.gov

🕒 8:00 a.m. to 5:00 p.m.

Elections Division

📞 800-262-VOTE(8683)

✉️ election@ks.gov

Business Services Division

📞 785-296-4564

✉️ kssos@ks.gov

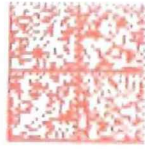
Publications Division

📞 785-296-BOOK(2665)

✉️ sos_lawbooks@ks.gov

Douglas County Clerk and Elections
711 W. 23rd Street Suite 1
Lawrence, KS 66046

FIRST-CLASS



US POSTAGE
ZIP 64 106 \$ 000.61⁰
02 7W
0008029067 APR 23 2026

EXHIBIT B - P. 1 of 2

RETURN SERVICE REQUESTED



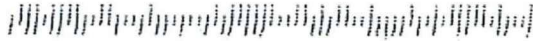
U.S. Representative: 0001
KS Senate: 0002
KS Representative: 0044
State Board of Educ: 0006
Judicial District: 0007
County Commission: 005

CERTIFICATE OF REGISTRATION

Issue date: 4/20/2026
Registrant ID: 2708554
Precinct: Lawrence 17
Voting Place: 14/17 First Presbyterian
Church
2415 Clinton Pkwy

David Groff Miller
P O BOX 3073
Lawrence, KS 66046

Party: No Labels Kansas



IS EVERYTHING CORRECT? Verify that your name, address, and party are current.

- If correct, keep this card.
- If not, fill out the card below with your new information, and return it to the Election Office; a new card will be issued to you. Whenever your residential address or other election information changes, contact your Election Office.
Visit: www.douglascountyelections.com for up-to-date election information.

NOW THAT YOU ARE REGISTERED, YOU CAN VOTE!

Name _____

Former Name _____

Street Address _____ Apt _____

City _____ St _____ Zip _____

Telephone (____) _____ Party _____

Birthdate ____/____/____ Date Moved ____/____

Signature
(Required) _____



Jamie Shew
Douglas Co. Election Officer
711 W. 23rd St. Suite 1
Lawrence, KS 66046

P: (785)832-5267
F: (785)832-5192



Remember your photo ID to vote!

[Back to Lookup](#) / [Registrant Detail](#)

Kristian Dale Vanmeteren

3800 120th Road Thayer, KS 66776 - Neosho

Political Party
No Labels Kansas

Precinct
**Chetopa H9
CH9**

Election Details

08/04/2026 2026 Primary Election

We did not find an advance or provisional ballot associated with the selected election.

Polling Location

There is no polling location information available for the address and election.

Districts

Show

Voting History

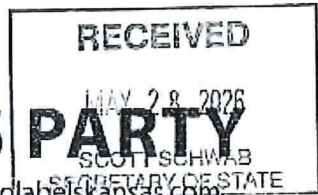
Hide

Election Date	Election Name	Type	Method
11/05/2024	2024 General Election	General	Early
08/06/2024	2024 Primary Election	Primary	Advance
11/05/1996	General Election 1996	General	Polling Place
08/06/1996	Primary Election 1996	Primary	Polling Place
04/04/1995	City And School	Special	Polling Place
02/28/1995	City And School	Special	Polling Place
11/08/1994	General Election 1994	General	Polling Place
08/02/1994	Primary Election 1994	Primary	Polling Place
11/03/1992	General Election 1992	General	Polling Place



NO LABELS KANSAS PARTY

David G. Miller, Chairman | 913-349-2268 | chairman@nolabelskansas.com



CERTIFICATE OF NOMINATION

Per KSA 25-302, No Labels Kansas, a political party recognized by the State of Kansas, certifies that it has nominated the following candidate for the 2026 Kansas general election and further requests that said nominee's name appear on the 2026 Kansas general election ballot:

DAVID G. MILLER RESIDING AT 2901 ATCHISON CIRCLE, LAWRENCE, KS 66047



for the office of

KANSAS INSURANCE COMMISSIONER

Per Section 5 of the No Labels Kansas Constitution and Bylaws, ratified on February 28, 2026, the above-named candidate has received the nomination of No Labels Kansas and is thus nominated for the office indicated above.

By signing below, we certify that the information provided herein is true and correct to our best information and belief.

Signed,

Affirmed,

David G. Miller 27 May 2026
David G. Miller, Chairman DATE
No Labels Kansas Party

John D. Altevogt 5-27-26
John D. Altevogt, Secretary DATE
No Labels Kansas Party

ACCEPTANCE BY CANDIDATE

I hereby accept the nomination of
No Labels Kansas Party for the office of:

KANSAS INSURANCE COMMISSIONER

and agree to allow my name to appear on the
ballot in the Kansas general election, scheduled to
be held on November 3, 2026.

David G. Miller 27 May 2026
[SIGNATURE] DATE

David G. Miller
2901 Atchison Circle
Lawrence, KS 66047

ATTESTATION BY NOTARY

State of Kansas, County of WYANDOTT:

Subscribed and sworn to before me this 27TH
day of MAY, 2026.

Timothy R. Golba
Notary Public

My Commission Expires: 4/25/2030

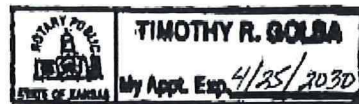




EXHIBIT E - P. 1 of 1

NO LABELS KANSAS PARTY

David G. Miller, Chairman | 913-349-2268 | chairman@nolabelskansas.com

CERTIFICATE OF NOMINATION

Per KSA 25-302, No Labels Kansas, a political party recognized by the State of Kansas, certifies that it has nominated the following candidate for the 2026 Kansas general election and further requests that said nominee's name appear on the 2026 Kansas general election ballot:

KRISTIAN D. VAN METEREN REGISTERED AT 3800 120TH RD, THAYER, KS 66776

for the office of

KANSAS SECRETARY OF STATE

Per Section 5 of the No Labels Kansas Constitution and Bylaws, ratified on February 28, 2026, the above-named candidate has received the nomination of No Labels Kansas and is thus nominated for the office indicated above.

By signing below, we certify that the information provided herein is true and correct to our best information and belief.

Signed,

Affirmed,

David G. Miller 31 May 2026
David G. Miller, Chairman DATE
No Labels Kansas Party

John D. Altevoigt 5-31-26
John D. Altevoigt, Secretary DATE
No Labels Kansas Party

ACCEPTANCE BY CANDIDATE

I hereby accept the nomination of
No Labels Kansas Party for the office of:

KANSAS SECRETARY OF STATE

and agree to allow my name to appear on the
ballot in the Kansas general election, scheduled to
be held on November 3, 2026.

Kristian D. Van Meteren 5/31/26
[SIGNATURE] DATE

Kristian D. Van Meteren
3800 120th Rd
Thayer, KS 66776

ATTESTATION BY NOTARY

State of Kansas, County of JOHNSON

Subscribed and sworn to before me this 31ST
day of MAY, 2026.

Timothy R. Yalla
Notary Public
My Commission Expires: 4/12/2030

EXHIBIT F - P. 1 of 2

SCOTT SCHWAB
Secretary of State



Docking State Office Building
915 SW Harrison Street
Topeka, KS 66612
(785) 296-4564
sos.ks.gov

STATE OF KANSAS

May 8, 2026

Mr. David Miller,
PO Box 51
Bonner Springs, KS 66012-0051
chairman@nolabelskansas.com

Dear Mr. Miller:

The Office of the Kansas Secretary of State has reviewed your recent representations claiming authority to act on behalf of the recognized political party "No Labels Kansas" (NLKS). This letter serves as formal notice that the organization you purport to represent is not NLKS, the recognized political party operating in the State of Kansas.

In 2024, the Secretary of State granted recognized political party status to NLKS pursuant to K.S.A. 25-302a. That designation was conferred following the submission and verification of the statutorily required petition signatures, a process that entails a substantial investment of time, organization, and financial resources, and other required filings. NLKS, the recognized political party, maintains the original certification issued by this office and remains the only entity authorized to act under that designation.

Our records indicate that the entity or entities with which you are affiliated appear to be one or more of the following registered corporations:

- No Labels Kansas Party, Inc. (Business ID No. 9999643)
- No Labels Kansas, Inc. (Business ID No. 9999156)
- No Labels Party of Kansas, Inc. (Business ID No. 9999155)

None of these corporations has applied for or been granted recognized political party status by the Secretary of State. Corporate registration with the Kansas Secretary of State, by whatever name, does not confer, substitute for, or imply recognition as a political party under Kansas law.

You are further advised that impersonating a political party officer or falsely claiming authority to act on behalf of a recognized political party may constitute a violation of K.S.A. 25-2424 and may subject the responsible individual(s) to criminal penalties. This office is currently aware of,

EXHIBIT F - P. 2 of 2

and cooperating with, an ongoing criminal investigation involving a similar attempt in 2024 to misrepresent affiliation with the recognized No Labels Kansas political party.

Additionally, under its governing rules, NLKS, the recognized political party, cannot nominate candidates for statewide office, and that pursuant to K.S.A. 25-302b, it may lose its recognized political party status.

Accordingly, the Secretary of State will not accept, process, or recognize any political party filings submitted by you or anyone affiliated with any of the above-referenced corporations purporting to be on behalf of "No Labels Kansas," the recognized political party.

Last, it has been the longstanding position of this office to not pre-approve document formats such as registration forms, advance ballot applications, or certifications. There is no requirement to do so in state law, and the law itself provides the required content for such documents.

Clayton L. Barker

Clayton Barker
General Counsel, Kansas Secretary of State
Clay.barker2@ks.gov

EXHIBIT G - P. 1 of 3

NO LABELS KANSAS CONSTITUTION AND BYLAWS (UNDER KAN. STAT. ANN. § 25-101 ET SEQ.)

1. Name and Governance.

The name of this party shall be “No Labels Kansas” (hereinafter “NLKS”) and it shall operate under the incorporated name, “No Labels Kansas, Inc.” To conform to and comply with KSA § 25-3307, by ratifying this document via a plebiscite of its registered voters, NLKS shall be governed by this document, which shall serve as NLKS’s official constitution, charter, bylaws, rules, and regulations for purposes of Kansas state election law. Upon ratification by NLKS registrants as described in Section 4(b) below, all other draft documents, previous versions, and proposed rules governing the establishment and governance of NLKS will be deemed void and without effect.

2. Purpose and Authorized Activities.

NLKS seeks to advance and enact sound public policy. Accordingly, NLKS is dedicated to the promotion of candidates, values, and legislation that conform to its platform and principles. NLKS shall aid in every way possible its nominees chosen at conventions or caucuses organized for such purposes. NLKS shall coordinate and unite under a central, statewide organization the activities of voters who choose to register under its designation and shall work to ensure its growth through voter registration and by attracting disenfranchised members of other political parties.

3. Party Membership.

a. Eligibility and Qualification. An individual is an NLKS party member if they are: (i) a U.S. citizen who resides in Kansas; (ii) 18 years of age or older; and (iii) registered to vote under the designation assigned to NLKS by the Kansas Secretary of State (currently “No Labels Kansas”).

b. Rights. All NLKS Members are entitled to participate in NLKS as described in this Constitution and Bylaws.

4. State Executive Committee.

a. Powers and Duties. The State Executive Committee shall direct, administer, and execute NLKS authorized activities. The State Executive Committee may also perform other tasks as described in the Constitution and Bylaws.

b. Composition, Initial Appointment, Qualifications, and Terms of Service. The State Executive Committee shall consist of no fewer than three individuals who qualify as party members under Section 3(a) above. The initial members of the State Executive Committee shall be elected by a simple plurality of NLKS registrants participating in a mail-in plebiscite. To vote in said plebiscite, participants must have been recorded by the Secretary of State as being registered under “No Labels Kansas” as of November 5, 2025. Each voter so registered shall be mailed a single ballot for the purpose of **i)** ratifying this Constitution and Bylaws; and **ii)** electing the initial members of the State Executive Committee. All ballots cast in said plebiscite must be postmarked by February 23, 2026 and received on or prior to February 28, 2026 to be counted.

EXHIBIT G - P. 2 of 3

If, following the election of the initial members of the State Executive Committee, a vacancy occurs on the State Executive Committee, the vacancy shall be filled by other members of the State Executive Committee.

c. Officers.

i. The State Executive Committee shall elect from among its number a Chair, Secretary, and Treasurer. The State Executive Committee may also elect a Vice Chair and other officers it deems are necessary and proper. Each officer shall serve a term that lasts until the officer dies, resigns, or is removed by a vote of no less than two-thirds of the State Executive Committee's other members.

ii. The Chair shall serve as NLKS's chief executive officer, consider requests to use NLKS's name or symbols, preside over all meetings or gatherings convened to conduct NLKS business, and communicate or select a designee to communicate on behalf of NLKS. The Chair shall also establish a designated bank depository account if required by Kansas law, authorize the raising of contributions to NLKS and authorize the expenditure of NLKS funds according to a budget set forth by the State Executive Committee.

iii. The Secretary shall issue all notices required under the Constitution and Bylaws and serve as the Secretary during any convention or caucus of NLKS's Membership.

iv. The Treasurer shall ensure the timely deposit of any contributions to NLKS into NLKS's designated bank depository account, periodically report to the State Executive Committee on NLKS's financial activity, including an accounting of all authorized fundraising efforts, deposits, and authorized expenditures. The Treasurer shall have custody of any funds and financial records of NLKS, ensure NLKS funds are maintained and disbursed properly in a lawful manner, file required periodic state and federal campaign finance reports, and perform any other duties required by Kansas or federal law.

v. The Vice Chair and any other officers deemed necessary and proper by the State Executive Committee shall perform duties as assigned by the State Executive Committee.

d. Meetings. Meetings of the State Executive Committee shall be held at least once each calendar year to elect party officers and to conduct other party business. Either the State Executive Committee's Chair or a majority of the State Executive Committee's members may call for a meeting at any other time. Notice of such a meeting must be distributed to all members of the State Executive Committee prior to the meeting and provide the meeting's purpose, time, place (if any), and method to participate via telephone and/or videoconference. The State Executive Committee's members may participate in a meeting via telephone, video conference, or similar communications equipment. A quorum for the transaction of business at a meeting consists of a majority of the State Executive Committee's members. The State Executive Committee shall take action at a meeting through an affirmative vote of the majority of the State Executive Committee's members who are present at or participating in a duly held meeting. All meetings of the State Executive Committee shall be conducted according to Robert's Rules of Order or other generally accepted parliamentary practices.

e. Action Outside a Meeting. Any action that may be taken during a meeting of the State Executive Committee may be taken without such a meeting, if authorized in writing (including via email or other electronic method) by a majority of all members of the State Executive Committee.

EXHIBIT G - P. 3 of 3

5. Convention or Caucus of Party Membership.

a. Purpose. The State Executive Committee may call a convention or caucus of NLKS party members at any time for the purpose of nominating candidates for any federal, state, or local elective office. NLKS Members may also raise for discussion at such a convention or caucus other matters related to NLKS's authorized activities.

b. Timing and Notice. The State Executive Committee shall set the time, date, and place of conventions or caucuses and timely notify NLKS Members of such. The State Executive Committee may, at its option, choose to facilitate NLKS party members' participation in or observation of the convention or caucus through use of mail-in ballots, telephone, video conference, or similar communications equipment.

c. Convention or Caucus Procedures. The Chair shall preside at all conventions and caucuses. The convention or caucus may adopt its own rules governing the conduct of that convention or caucus. Where such rules are silent, proceedings shall be conducted according to Robert's Rules of Order or other generally accepted parliamentary procedures. A quorum for the transaction of business at the convention or caucus consists of a simple majority of NLKS's Members participating.

6. Nominees for Federal, State, or Local Office.

The nominees of NLKS shall be the candidates nominated at a convention or caucus organized for such purpose. The State Executive Committee shall ensure that no more than one candidate is nominated for each office. The State Executive Committee shall timely undertake all necessary and legally required actions for the nominees of NLKS to appear on the general election ballot in Kansas.

7. Adoption of Constitution and Bylaws; Amendments Thereto.

This Constitution and Bylaws shall be initially ratified and adopted as described in Section 4(b) above. Upon ratification, these Bylaws may be amended, as necessary, by a majority of the State Executive Committee.

Certification of Ratification and Adoption

February 28, 2026

Per Bylaws 1 and 4(b) above, I hereby certify that this document was mailed to 6,007 Kansas residents registered to vote under the No Labels Kansas party designation as of November 5, 2025. The No Labels Kansas Constitution and Bylaws printed above, having received more than the required majority of ballots cast by said NLK registrants and returned on or before February 28, 2026, are hereby declared ratified and adopted.



Kristian D. Van Meteren, Interim Chairman and Secretary

EXHIBIT H - P. 1 of 2

SCOTT SCHWAB
Secretary of State



Docking State Office Building
915 SW Harrison Street
Topeka, KS 66612
(785) 296-4564
sos.ks.gov

STATE OF KANSAS

June 1, 2026

SENT BY E-MAIL and REGULAR US MAIL

Mr. David Miller
P.O. Box 51
Bonner Springs, Kansas 66012
chairman@nolabelskansas.com

Dear Mr. Miller:

On May 28, 2026, the Office of the Secretary of State received a document captioned "Certificate of Nomination" purporting to nominate you as the No Labels Kansas Party candidate for Commissioner of Insurance.

After review, I have determined that the certificate of nomination is not valid and cannot be accepted.

K.S.A. 25-302 authorizes nominations by convention or caucus only when made by a recognized political party. The statute further requires that the convention or caucus be called by the state chairperson of the party and that the resulting certificate of nomination be executed by the presiding officer and secretary of the convention or caucus.

On May 8, 2026, the Office of the Secretary of State determined that the No Labels Kansas Party was no longer a recognized political party in Kansas. Accordingly, at the time the certificate of nomination was submitted, the organization identified in the filing was not a recognized political party authorized to nominate candidates pursuant to K.S.A. 25-302. Moreover, the leadership of the No Labels Kansas Party that was legitimately recognized by this office back in 2024 has confirmed that you are not, and never have been, an officer of that party and have no authority to act on its behalf.

In addition, the Office of the Secretary previously rejected purported candidate nominations submitted by the organization with which you are associated in June 2024 on the ground that the organization was not a recognized political party under Kansas law. The Office's determination remains unchanged.

Accordingly, the purported certificate of nomination submitted on your behalf is invalid and will not be accepted. Your name will not be placed on the ballot as the No Labels Kansas Party nominee for Commissioner of Insurance.

EXHIBIT H - P. 2 of 2

Pursuant to K.S.A. 25-308, you may file a written objection to this determination within three days after receipt of this notice. Any objection must be received by the Office of the Secretary of State no later than 5:00 p.m. on June 4, 2026.

If you have questions regarding this notice, please contact Bryan Caskey, Director of Elections, at (785) 296-4561.

Sincerely,

A handwritten signature in cursive script that reads "Scott Schwab".

SCOTT SCHWAB
Kansas Secretary of State

EXHIBIT I - P. 1 of 2

SCOTT SCHWAB
Secretary of State



Docking State Office Building
915 SW Harrison Street
Topeka, KS 66612
(785) 296-4564
sos.ks.gov

STATE OF KANSAS

June 1, 2026

SENT BY E-MAIL and REGULAR US MAIL

Mr. Kristian van Meteren
3800 120th Rd
Thayer, KS 66776
chairman@nolabelskansas.com
krisv@singularisgroup.com

Dear Mr. van Meteren:

On May 28, 2026, the Office of the Secretary of State received a document captioned "Certificate of Nomination" purporting to nominate you as the No Labels Kansas Party candidate for Secretary of State.

After review, I have determined that the certificate of nomination is not valid and cannot be accepted.

K.S.A. 25-302 authorizes nominations by convention or caucus only when made by a recognized political party. The statute further requires that the convention or caucus be called by the state chairperson of the party and that the resulting certificate of nomination be executed by the presiding officer and secretary of the convention or caucus.

On May 8, 2026, the Office of the Secretary of State determined that the No Labels Kansas Party was no longer a recognized political party in Kansas. Accordingly, at the time the certificate of nomination was submitted, the organization identified in the filing was not a recognized political party authorized to nominate candidates pursuant to K.S.A. 25-302. Moreover, the leadership of the No Labels Kansas Party that was legitimately recognized by this office back in 2024 has confirmed that you are not, and never have been, an officer of that party and have no authority to act on its behalf.

In addition, the Office of the Secretary previously rejected purported candidate nominations submitted by the organization with which you are associated in June 2024 on the ground that the organization was not a recognized political party under Kansas law. The Office's determination remains unchanged.

Accordingly, the purported certificate of nomination submitted on your behalf is invalid and will not be accepted. Your name will not be placed on the ballot as the No Labels Kansas Party nominee for Secretary of State.

EXHIBIT I - P. 2 of 2

Pursuant to K.S.A. 25-308, you may file a written objection to this determination within three days after receipt of this notice. Any objection must be received by the Office of the Secretary of State no later than 5:00 p.m. on June 4, 2026.

If you have questions regarding this notice, please contact Bryan Caskey, Director of Elections, at (785) 296-4561.

Sincerely,

A handwritten signature in cursive script that reads "Scott Schwab".

SCOTT SCHWAB
Kansas Secretary of State



NO LABELS KANSAS PARTY

David G. Miller, Chairman | PO Box 51, Bonner Springs, KS 66012-0051
913-349-2268 | chairman@nolabelskansas.com

June 4, 2026

Kansas Secretary of State
915 SW Harrison St
Topeka, KS 66612

I acknowledge receipt of a letter dated June 1, 2026 and signed by Scott Schwab, determining that my nomination to the office of Kansas Insurance Commissioner under the No Labels Kansas party is not valid and announcing that my name will not appear on the November 2026 general election ballot.

As advised in the letter, pursuant to KSA 25-308, I hereby OBJECT to his determination.

There are glaring factual errors in the letter that must be addressed as well.

Please advise of any and all statutes, regulations, procedures, rules, bylaws, and/or other such relevant materials I may need to proceed.

Also please advise as to next steps in this process, including all pertinent details I may need to contest Mr. Schwab's decision before the full Kansas State Objections Board.

Also, in light of the situation, must I appoint a Treasurer for my campaign while this process unfolds?

Please respond via the email previously used and via US mail at the address following my signature:

David G. Miller Date
P O Box 3073, Lawrence, KS 66046
913-349-2268 | chairman@nolabelskansas.com



NO LABELS KANSAS PARTY

David G. Miller, Chairman | PO Box 51, Bonner Springs, KS 66012-0051
913-349-2268 | chairman@nolabelskansas.com

June 4, 2026

Lt. Governor David Toland
300 SW 10th Ave Rm 252-S
Topeka, KS 66612-1501

Dear Lt. Governor Toland:

I am writing to you today in your capacity as one of three individuals designated to consider objections under the provisions of KSA 25-308.

As you likely know, the Secretary of State has determined my nomination to be “not valid” and rejected my candidacy. Today, I filed my objection to that determination with the Secretary.

On May 18, 2026, the Secretary acted unilaterally to dissolve No Labels Kansas and disaffiliate all of its more than 7,000 registered voters, directing county election officers to immediately designate previously registered NLKS voters as “unaffiliated.” That outrageous act, which is clearly not authorized under KSA 25-302b, prompted me to file suit on May 28, 2026 against the Secretary.

The court initially offered to set the matter for hearing on June 1, at 10:00 am, prior to the filing deadline. We accepted. The Secretary’s lawyer then asked for more time to prepare a defense for the state’s action (it seems many of the lawyers are on vacation). Bear in mind that all of this is happening based upon the Secretary’s actions. We remain in touch with the Shawnee County District Court and hope to have a hearing date set very soon.

As you no doubt understand, there are many attendant issues related to this matter which I anticipate the court may address. Specifically, the Secretary’s active, inappropriate, and uncalled for intervention into the internal operation of No Labels Kansas, a recognized Kansas political party.

Accordingly, I am asking that my objection NOT be immediately considered since there is a pending court case. My candidacy, once approved, should be listed on general election ballots, which are not printed until the first week of September. Therefore, in my view, there is no need for the State Board of Objections to address it immediately.

EXHIBIT J - P. 3 of 5

Moreover, if the court reverses or stays the Secretary's order of May 18, 2026, preserves No Labels Kansas's designation as a recognized political party, and restores the affiliation preferences chosen by more than 7,000 No Labels Kansas registrants, the Secretary's determination of my candidacy to be "not valid" will likely also be set aside.

On the other hand, if the State Board of Objections proceeds, the objection I am now raising is immediately considered, and the Secretary's determination is sustained, that may also be set aside by the court.

In either circumstance, for the Kansas State Board of Objections to rush consideration of the Secretary's determination and my objection to it may turn out to be a wasted effort, depending on the ruling of the court.

The public would likely see all this as yet another example of government officials "playing games" to suit their personal or political agendas, resulting in the further undermining of public confidence in our political and electoral processes. I submit to you that we do not want that.

If you should desire to discuss this matter further with me personally, please have your staff contact me and I will make every effort to accommodate your schedule.

Most Sincerely,

David G. Miller, Chairman
No Labels Kansas Party
PO Box 51, Bonner Springs, KS 66012-0051
913-349-2268
chairman@nolabelskansas.com



NO LABELS KANSAS PARTY

David G. Miller, Chairman | PO Box 51, Bonner Springs, KS 66012-0051
913-349-2268 | chairman@nolabelskansas.com

June 4, 2026

Attorney General Kris W. Kobach
120 SW 10th Ave 2nd Floor
Topeka, KS 66612

Dear Attorney General Kobach:

I am writing to you today in your capacity as one of three individuals designated to consider objections under the provisions of KSA 25-308.

As you likely know, the Secretary of State has determined my nomination to be “not valid” and rejected my candidacy. Today, I filed my objection to that determination with the Secretary.

On May 18, 2026, the Secretary acted unilaterally to dissolve No Labels Kansas and disaffiliate all of its more than 7,000 registered voters, directing county election officers to immediately designate previously registered NLKS voters as “unaffiliated.” That outrageous act, which is clearly not authorized under KSA 25-302b, prompted me to file suit on May 28, 2026 against the Secretary.

The court initially offered to set the matter for hearing on June 1, at 10:00 am, prior to the filing deadline. We accepted. The Secretary’s lawyer then asked for more time to prepare a defense for the state’s action (it seems many of the lawyers are on vacation). Bear in mind that all of this is happening based upon the Secretary’s actions. We remain in touch with the Shawnee County District Court and hope to have a hearing date set very soon.

As you no doubt understand, there are many attendant issues related to this matter which I anticipate the court may address. Specifically, the Secretary’s active, inappropriate, and uncalled for intervention into the internal operation of No Labels Kansas, a recognized Kansas political party.

Accordingly, I am asking that my objection NOT be immediately considered since there is a pending court case. My candidacy, once approved, should be listed on general election ballots, which are not printed until the first week of September. Therefore, in my view, there is no need for the State Board of Objections to address it immediately.

EXHIBIT J - P. 5 of 5

Moreover, if the court reverses or stays the Secretary's order of May 18, 2026, preserves No Labels Kansas's designation as a recognized political party, and restores the affiliation preferences chosen by more than 7,000 No Labels Kansas registrants, the Secretary's determination of my candidacy to be "not valid" will likely also be set aside.

On the other hand, if the State Board of Objections proceeds, the objection I am now raising is immediately considered, and the Secretary's determination is sustained, that may also be set aside by the court.

In either circumstance, for the Kansas State Board of Objections to rush consideration of the Secretary's determination and my objection to it may turn out to be a wasted effort, depending on the ruling of the court.

The public would likely see all this as yet another example of government officials "playing games" to suit their personal or political agendas, resulting in the further undermining of public confidence in our political and electoral processes. I submit to you that we do not want that.

If you should desire to discuss this matter further with me personally, please have your staff contact me and I will make every effort to accommodate your schedule.

Most Sincerely,

David G. Miller, Chairman
No Labels Kansas Party
PO Box 51, Bonner Springs, KS 66012-0051
913-349-2268
chairman@nolabelskansas.com

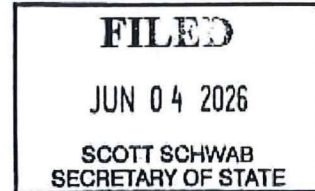


NO LABELS KANSAS PARTY

Kristian D. Van Meteren, Vice Chairman | PO Box 51, Bonner Springs, KS 66012-0051
913-307-6720 | krisv@singularisgroup.com

June 4, 2026

COPIED: Lt. Governor David Toland
Attorney General Kris Kobach



Kansas State Board of Objections
Attn: Secretary of State Scott Schwab
915 SW Harrison St
Topeka, KS 66612

Dear Secretary Schwab, Lt. Governor Toland, and Attorney General Kobach:

I am in receipt of a letter under your signature, Mr. Secretary, dated June 1, 2026. It was emailed by Director of Elections, Bryan Caskey, and notified me that the certificate of nomination I submitted earlier that morning to the Director, "is not valid and cannot be accepted."

With this writing, I am lodging an objection to your decision and am seeking intervention by the Kansas State Objections Board to reverse the action you have taken to remove my name from the November 2026 general election ballot.

Your letter explains your reasoning which remains faulty, but unchanged, since you began relying upon it almost exactly two years ago when I first took steps to finish the organizational process others failed to complete, but which is statutorily required of recognized Kansas political parties.

At its core, your assertion is that I (and now others who lead No Labels Kansas party, or NLKS) are not, in your opinion, the valid leaders of the party. In other communications and actions, I have laid out with specificity the reasons your opinion is not only wrong, **it is irrelevant** regarding what, at best, *might* be described as an internal dispute over who does, or does not, have the right to claim leadership of No Labels Kansas party.

I emphasize the word "*might*," Mr. Secretary, because the reality is that not a single voter registered under the No Labels Kansas designation nor any other individual - save you - has legally challenged the legitimacy of my efforts, and now those of others, to further organize and lead No Labels Kansas.

Instead, you continue to fall back on the flimsy and false argument that the non-profit corporations I set up in June of 2024 specifically to provide liability protection for the party, secure its name, and provide a legal vehicle through which to interact with the Internal Revenue Service, banking institutions, and other regulatory agencies are, somehow, separate entities from the party you recognized on January 17, 2024.

EXHIBIT K - P. 2 of 8

This is an indefensible argument that flies in the face of what you know to be true about Kansas's other four political parties: that they have set up identical or nearly identical non-profit corporations under which they conduct their affairs, and for the same reasons. Those recognized political parties have operated, some for many years, under the umbrella of their non-profit corporations without hair-splitting or harassment by you or any former Secretary of State.

As I have pointed out previously, you continue to recognize the current officers of the Kansas Democratic and Republican Parties, despite the fact that the parties they lead conduct their affairs under the names "The Kansas Democratic Party, Incorporated" (Business ID 1716794) and "Kansas Republican Party, Inc." (Business ID 8313934), respectively. And, of course, the names of those parties' current officers were not listed on any original documents submitted to the Kansas Secretary of State if, indeed, any exist.

That you continue attempting to draw a distinction between the non-profit corporations I set up and the party itself in an attempt to divorce current NLKS leaders from the party we lead is further evidence of a documented pattern of personal hostility toward me and the overt harassment that you have displayed toward the movement that spawned the formation of our party from its earliest appearance in Kansas, now almost three years ago.

As you know, Mr. Secretary, no provision in Kansas law allows you to wade into internal party affairs, disputes, or disagreements. You simply do not have any statutory authority allowing you to personally opine about such matters and then springboard off that personal opinion into taking official actions which strip me, and now others, of our constitutionally and statutorily guaranteed rights to free speech, expression, and association.

In addition, you continue to defy the legal reality that **you are pointedly barred from intervening in such matters** including, specifically, "who shall be entitled to hold officer positions, and procedures for state political parties."

As I have laid out in great detail in prior communications, the landmark U.S. Supreme Court ruling, *Eu vs. San Francisco Democratic Central Committee*, prompted the unanimous passage of SB 574 by the Kansas legislature in 1990. That bill (attached to this letter), which was signed into law by then-Governor Mike Hayden, repealed several provisions in Kansas law that had existed prior to its passage related to the state's ability to intervene or have a say in the operation of political parties.

Specifically, related to the issue prompting this letter today, SB 574 **repealed:**

- KSA 1989 Supp. 25-3804, described in the bill as "relating to the establishment of membership for state political party committees," and
- KSA 1989 Supp. 25-3805, described in the bill as "relating to the establishment of executive committees, **who shall be entitled to hold officer positions**, and procedures for state political party committees."

As you well know and have acknowledged in other ways, times, and circumstances, that law stripped the state of Kansas of having a role or say in internal party affairs and processes, including possible disagreements over who is or is not the "valid" leader of any given party.

As this state's chief election officer, the impact of SB 574 falls most directly on you. Simply bearing

EXHIBIT K - P. 3 of 8

the title “Secretary of State” does not empower you to ignore laws you don’t like or that may conflict with your own personal agenda or partisan objectives.

The fact that no other individual or party has stepped forward to challenge me or other current leaders of No Labels Kansas and that **you are the lone party attempting to do so**, smacks of overt harassment and the intentional suppression of my constitutional rights, and now those of many others. It has all the hallmarks of the weaponization of a government agency for which you are responsible against those you perceive may pose a threat to your personal objectives or those of your allies.

You attempt to portray that your motivations are rooted in protecting the interests of those you have decided are the “legitimate” leaders of NLKS (reputedly involved in the collection of petitions nearly three years ago). However, I note, none of those parties, some of whom are now deceased or in nursing homes and others who live outside of Kansas, ever even bothered to re-register to vote under the No Labels Kansas designation.

Neither did they take any steps to follow and complete the organizational process required by Kansas statutes for recognized political parties, as I have. And none have stepped forward to mount any semblance of a legal challenge to my efforts to do so. And why should they?

Though they were initially rebuffed and stiff-armed by you (prompting a lawsuit in 2023), after my efforts to organize and lead No Labels Kansas came to your attention in 2024, those you initially sought to thwart have found an aggressive, taxpayer-funded advocate in the Kansas Secretary of State. Perhaps that change of attitude toward those you now assert are the “legitimate” leaders of NLKS is an outgrowth of who is perceived to pose a bigger political threat to you, your allies, and your joint interests, agendas, and objectives.

I continue to document the extraordinary lengths to which you have gone to harass, thwart, and undermine the efforts of now many people working to ensure that NLKS remains a viable ongoing concern. Those lengths include your recent move to entirely dissolve No Labels Kansas and scatter its registrants, based on nothing more than a “request” by a single Republican operative who, we believe, submitted his “request” in direct or indirect coordination with your office.

And now, once again, you are attempting to chill my rights and those of more than 7,000 Kansans by seeking to block my nomination for the office of Secretary of State. Indeed, I would argue that you are also throttling the constitutional rights of more than 2 million Kansas voters by denying them additional choices on their ballots this fall.

As you know, your outrageous and extra-statutory moves have already prompted the filing of one lawsuit against you which may now be supplemented in light of the determination you made and announced in your June 1, 2026 letter. Others are investigating additional suits against you in state and federal court for the egregious and unwarranted actions you have taken and continue to take against No Labels Kansas. All of these self-serving actions on your part are potentially creating a significant legal and financial liability to Kansas taxpayers.

Your continuing moves to harass and block me and others leading No Labels Kansas – in stark contrast to your cooperative attitude toward others in similar leadership positions within other parties – seem to be rooted in some sort of unexplained personal animus toward me and those now leading No Labels Kansas. Such actions may cause you to run afoul of several state and federal laws.

EXHIBIT K - P. 4 of 8

The qualified immunity granted to you as Secretary of State, which you apparently believe insulates you so you may continue these games, may not extend to you personally if your war against No Labels Kansas and me continues (see 42 U.S. Code § 1983).

Returning to your June 1, 2026 letter announcing your intention to disqualify my nomination and prevent my name from appearing on the November 2026 general election ballot, your decision hinges entirely on the above referenced argument – one, again, that you alone are making – that the current leadership of No Labels Kansas does not represent the “valid” or “legitimate” leadership of the party.

You continue to ignore and gloss over the fact that a statewide plebiscite election was conducted earlier this year involving all registered No Labels Kansas voters (more than 6,000 at the time the ballots were sent out), culminating in the ratification of current bylaws and the election of NLKS’s current leadership team.

Instead, you reflexively and ridiculously point to a letter, allegedly signed electronically by a now-deceased woman, naming four individuals – not one of whom ever changed his or her party affiliation to No Labels Kansas – as a defense for your actions.

That letter is dated August 14, 2023, months before No Labels Kansas was even recognized as a Kansas political party. As I have repeatedly pointed out, KSA 25-3307 specifically requires, “Any political organization seeking the right of designation on voter affiliation lists after the effective date of this act shall file a statement of organization and a certified list of officers with the secretary of state. **Such organization shall have obtained official recognition as a political party prior to filing.**”

The letter submitted to you on which you now base your entire argument that current leaders of No Labels Kansas *are not* legitimate and the names typed on that document *are* legitimate, has no more standing, bearing, or authority to control the ongoing operations of No Labels Kansas than the pro-slavery Lecompton Constitution of 1857 (which was never adopted by the people of Kansas) has to dictate the policies or functions of Kansas government today.

The documents accompanying that August 2023 letter were never adopted, ratified, or certified, post-recognition. Thus, they are neither binding, operative, nor authoritative over the ongoing operations of a party now comprised of thousands of Kansans.

Further, Mr. Secretary, you have created for yourself conflicting narratives in an attempt to defend your actions that, logically and legally, may be difficult to continue sustaining.

Clearly, the individuals you insist are the “legitimate” leaders of No Labels Kansas party have never complied with KSA 25-3307 by filing the statutorily required documentation necessary to achieve the “right of designation on voter affiliation lists.”

Yet, prior to the recent illegal and draconian actions you took to unilaterally dissolve NLKS and scatter its registrants, thousands of Kansans had already chosen and were choosing to affiliate with No Labels Kansas by registering under its designation. In fact, you added the “No Labels Kansas” designation as an option available to Kansans on both paper and online voter registration applications.

How was that possible, Mr. Secretary, unless *someone* had complied with KSA 25-3307 by filing, post-recognition, the documentation required by that statute to achieve “the right of designation

EXHIBIT K - P. 5 of 8

on voter affiliation lists?” In other words, per KSA 25-3307, you could not have made that option available on voter affiliation lists unless *someone* had complied with that statute. But, you did.

So, who was the *someone* who followed the law and filed the required paperwork that made it possible for you to offer that option to Kansas voters? It certainly wasn't one of the four individuals you continue to claim are the “legitimate” leaders of No Labels Kansas.

That *someone* was me, Mr. Secretary.

I was the only individual to launch an effort to begin completing the steps needed to make it statutorily possible for you to offer No Labels Kansas as an option on voter affiliation lists. Since I took those now-frequently-mocked-but-perfectly-legal steps in 2024, others have since joined the party's leadership team and have continued efforts to build, strengthen, and grow No Labels Kansas into a viable option available to Kansans on both their ballots and their voter registration forms. The legitimacy of their leadership of NLKS was affirmed in the aforementioned plebiscite.

My point is this: you are caught in the hypocritical and untenable position of having allowed more than 7,000 Kansans to register as No Labels Kansas voters while simultaneously continuing to insist that those who took and continue taking those steps are not the legitimate leaders of “NLKS, the recognized political party operating in the State of Kansas.”

Mr. Secretary, your arguments in defense of your actions are falling apart. You simply don't have the legal authority to continue intervening in this matter, denying my legitimacy and now that of others who are leading No Labels Kansas, illegally attempting to dissolve the party, disaffiliating thousands of Kansans from its voter rolls, and now refusing to do your job by accepting the valid Certificate of Nomination I submitted on June 1 so that my name will appear on the November 2026 general election ballot.

You may choose to continue playing this game and waging war on NLKS and on me personally. In the end, winning or losing that game may come at significant cost. And to what end? Denying 2 million Kansas voters additional choices on their ballots this November?

Please stand aside, put an end to the weaponization of your agency against perceived political threats, limit your actions to only those allowed by law, and stop denying me, my fellow NLKS party members and leaders, and the voters of Kansas our constitutionally and statutorily guaranteed rights and privileges so that we may participate freely and without harassment in this state's political debates and processes.

I urge the Kansas State Objections Board to overturn the decision of Secretary of State Scott J. Schwab, disqualifying the certificate of nomination I submitted on June 1, 2026.

Respectfully,

Kristian D. Van Meteren, Objector
Candidate for Kansas Secretary of State

Session of 1990

SENATE BILL No. 574

By Committee on Elections

1-31

9 AN ACT repealing K.S.A. 25-3802, 25-3806, 25-3810 and 25-3811
10 and K.S.A. 1989 Supp. 25-3803, 25-3804 and 25-3805 relating to
11 political parties.

12

13 *Be it enacted by the Legislature of the State of Kansas:*

14 Section 1. K.S.A. 25-3802, 25-3806, 25-3810 and 25-3811 and
15 K.S.A. 1989 Supp. 25-3803, 25-3804 and 25-3805 are hereby
16 repealed.

17 Sec. 2. This act shall take effect and be in force from and after
18 its publication in the Kansas register.

SESSION OF 1990

SUPPLEMENTAL NOTE ON SENATE BILL NO. 574

As Recommended by Senate Committee on
Elections

Brief*

S.B. 574 would repeal the following:

1. K.S.A. 25-3802 relating to the establishment of membership and procedures for county central political party committees. Current law dictates that a meeting must be held two weeks after each primary, mandates the officer positions, provides for how meetings are to be called, and provides for proxies.
2. K.S.A. 25-3806 relating to the establishment of membership and procedures for city political party committees.
3. K.S.A. 25-3810 relating to the establishment of membership and procedures for political party platform committees. Current law specifies the date the committee must meet, provides that the Secretary of State or a designee call the meeting to order, mandates officer positions to be elected, prohibits proxies, requires the committee to adopt a platform, specifies that the platform must be available by 6:00 p.m. of the day following adjournment, and that a copy of the platform must be filed with the Secretary of State within one week of adjournment.
4. K.S.A. 25-3811 which requires that the chair and vice-chair of a political party committee be of the opposite gender.
5. K.S.A. 1989 Supp. 25-3803 relating to the establishment of membership and procedures for district political party committees. Current law mandates officer positions, provides for how meeting are to be called, dictates that meetings are to held within 90 days of a general

* Supplemental Notes are prepared by the Legislative Research Department and do not express legislative intent.

EXHIBIT K - P. 8 of 8

election, provides for committee member alternates, and prohibits proxies.

6. K.S.A. 1989 Supp. 25-3804 relating to the establishment of membership for state political party committees.
7. K.S.A. 1989 Supp. 25-3805 relating to the establishment of executive committees, who shall be entitled to hold officer positions, and procedures for state political party committees. Current law dictates that a meeting must be held within 120 days of the general election, provides for how the meeting is to be held, provides for committee member alternates, and prohibits proxies.

Background

S.B. 574 was introduced by the Senate Committee on Elections after hearing testimony from a representative of the Kansas Office of the Attorney General. The representative stated that it was the opinion of the Attorney General that Kansas statutes, which regulate the internal workings of political parties, would be found unconstitutional if challenged. The opinion was based on a United States Supreme Court decision which declared California statutes that regulated political parties unconstitutional, Eu v. San Francisco Democratic Com., 489 U.S. _____, 103 L.Ed.2d 271, 109 S.Ct. _____ (1989). The California statutes were challenged on the basis of rights guaranteed by the First and Fourteenth Amendments to the United States Constitution. The bill would repeal the statutes which were listed by the Attorney General's Office as possibly unconstitutional.