

ORIGINAL

In the
Supreme Court of Ohio

STATE ex rel. LETOHIOVOTE.ORG, et al.,	:	Case No. 2009-1310
	:	
Relators,	:	Original Action in Mandamus
	:	
v.	:	
	:	
OHIO SECRETARY OF STATE	:	
JENNIFER BRUNNER, et al.	:	
	:	
Respondents.	:	

BRIEF OF AMICI CURIAE
IN SUPPORT OF RELATORS, STATE EX. REL. LETOHIOVOTE.ORG
FILED BY:

ATM EDUCATION, BUCKEYE CHRISTIAN SCHOOLS ASSOCIATION, CHURCH
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INTRODUCTION

This case ultimately presents one simple question before the Court: Do the citizens of Ohio have the right to decide whether to change state law and expand gambling, or may their currently elected officials do so unilaterally?

The Ohio Constitution provides an unambiguous answer to this question, and it cannot be ignored for the sake of convenience. In the span of one week in July, the Governor and the General Assembly acted in whirlwind fashion to circumvent the letter and the spirit of Ohio law by denying the people their constitutional right to vote on whether gambling in the state should be expanded via so-called “video lottery terminals” (“VLTs”). But the Machiavellian plan cannot be upheld by the Ohio Supreme Court, because the ends—no matter how noble or important they are believed to be—do not justify the means.

This brief by Amici Curiae addresses two essential propositions as a response to the arguments presented in the Merit Brief of Intervenor-Respondents J. Pari Sabety, Director, Office of Budget and Management, and Michael A. Dolan, Director, Ohio Lottery Commission (hereinafter “Int. Merit Brf.”). First, as a matter of procedure, Amici submit that Intervenor’s request for a declaratory judgment regarding the scope of the pre-amended statute at issue (section 3770.03 of the Ohio Revised Code) is neither available at this time nor in this forum. Second, regarding the merits, the Governor and legislators’ attempted authorization of an entirely new form of gambling was an ultra vires act. For these and all other reasons presented before this Honorable Court, the Relators’ requested relief should be duly granted.

ARGUMENT

Facing a substantial projected shortfall in the 2010-2011 biennial budget, the Governor and state legislators scrambled to identify additional revenue sources. Int. Merit Brf., p. 8. On July 13, 2009, the Governor issued a directive to the Ohio Lottery Commission instructing it to adopt new licensing rules and then implement VLTs at seven Ohio racetracks as soon as the General Assembly enacted enabling legislation to do so. Rel. Complaint, Ex. A. On that same day, the General Assembly immediately delivered, as anticipated, with amendments to the

budget bill for fiscal years 2010-11, Am. Sub. H.B. 1 (“H.B. 1”). It was signed into law by the Governor four days later. Int. Merit Brf., p. 11. (VLTs were included in Section 256.10 of H.B. 1, which modified the existing lottery statute, Chapter 3770 of the Ohio Revised Code.) The state officials rationalized that their hasty action to implement VLTs was necessary to avert a looming fiscal crisis. Id., p.8. But such reasoning does not justify the circumvention of existing law.

The quandary of the Respondents and Intervenor-Respondents in this case is two-fold. First, there is no question that H.B. 1 generally—and the VLT provisions in particular—change the permanent law of the state. For that reason alone, the VLT provisions are subject to a referendum vote of the people. As this Honorable Court has made clear:

Any section of a law which changes the permanent law of the state is subject to referendum under the powers reserved to the people by Section 1 of Article II, even though the law also contains a section providing for an appropriation for the current expenses of the state government and state institutions which under Section 1d, Article II, becomes immediately effective.

State ex rel. Ohio AFL-CIO v. Voinovich (Ohio, 04-08-1994) 69 Ohio St.3d 225, 236 (emphasis added).¹ Second, everyone understands the General Assembly has never expressly voted to permit the operation of slot machines in Ohio, as would be required to evade the specific

¹ Article II, Section 1c of the Ohio Constitution expressly reserves for the people the fundamental right to challenge by referendum “any law, section of any law or any item in any law appropriating money passed by the General Assembly.” While Article II, Section 1d logically excludes from the broad referendum power “laws providing for tax levies, appropriations for the current expenses of the state government and state institutions, and emergency laws,” none of those three limited categories apply in the case at bar. As conceded by the Intervenor, “To be sure, the exemptions in Section 1d are subject to a ‘strict, but reasonable, construction.’ ” Intervenor’s Merit Brf., p.12 (citing State ex rel. Keller v. Forney (1923), 108 Ohio St. 463, syl. ¶¶ 1,2). Amici agree with the Relators, who have correctly explained that the specific VLT provisions of H.B. 1 cannot qualify as an “appropriation” or expenditure of funds—because the VLT provisions merely set forth a mechanism to raise certain funds. Relators’ Merit Brf., p. 9.

criminal prohibitions against the VLT slot machines presently contained in section 2915.02 of the Ohio Revised Code.

Realizing these flaws are fatal to the VLT provisions of H.B. 1, the Intervenor-Respondents have devised an outrageous, alternative theory for their case. Ignoring logic and every applicable rule of procedure, they ask with a wink: “Wouldn’t it just be so much easier if none of this legislation and resulting litigation was ever necessary in the first place?” But as this Honorable Court should affirm, the law can never be sacrificed for the sake of expediency.

I. Amici Curiae’s Propositions of Law No. 1: INTERVENOR-RESPONDENTS SEEK A DECLARATORY JUDGMENT THAT IS AVAILABLE NEITHER IN THIS FORUM NOR AT THIS TIME.

As stated in their Proposition of Law No. II, the Intervenor-Respondents boldly suggest this Court should simply look the other way and “confirm that the Lottery Commission has authority to implement VLTs regardless of the VLT Provisions in the Budget Bill.” Int. Merit Brf., P. 28 (italics added). In other words, Intervenor-Respondents want this Court to suddenly find that this vast authority for the Lottery Commission—to unilaterally create and expand new forms of gambling (this time via VLT slot machines)—is somehow implied in the pre-amended version of Chapter 3770 of the Ohio Revised Code. Of course, that is not and cannot be the case. Such carte blanche authority cannot be created from thin air. The former version of section 3770 of the Ohio Revised Code has never supported such an idea. To the contrary, the unambiguous language of section 2915.02 of the Ohio Revised Code mandates a specific vote of the legislature to expressly authorize a new form of gambling. Then, the Ohio Constitution allows the people the final say via referendum. If Intervenor-Respondents’ proposition were to be accepted, this elaborate and vitally important system of checks and balances would be trampled upon.

However, the problem with the Intervenor-Respondents' Proposition of Law No. II is even more fundamental: The declaratory judgment they seek is neither appropriate nor available in this forum. The sole, narrow issue in the case at bar is whether or not Relators are entitled by the Ohio Constitution to a referendum vote as requested. To date, the Intervenor-Respondents have filed no counterclaim or countersuit of any kind for a declaratory judgment in this Court. That step would certainly be a prerequisite for their requested declaratory judgment relief, if it were available here at all. But is not available.

As stated in another amicus brief previously filed herein: "This Court has repeatedly held that it lacks 'jurisdiction over claims for declaratory judgment.'" Brief of Amici Curiae Ohio Federation of Teachers, et al., p. 9-10 (quoting State ex rel. Ministerial Day Care Ass'n v. Zelman (2003), 100 Ohio St.3d 347, 351, 2003-Ohio-6447 at ¶ 22; and State ex rel. Coyne v. Todia (1989), 45 Ohio St.3d 232, 237). As summarized in State ex rel. Ohio Civil Serv. Employees Ass'n., 104 Ohio St.3d at 125, 2004-Ohio-6363 at ¶ 11 (citations omitted):

Because neither the Supreme Court of Ohio nor the Ohio courts of appeal have original jurisdiction over claims for declaratory judgment, these courts lack jurisdiction over actions that . . . actually seek a declaration of rights, status, or other legal relations.

This being so, what the Intervenor-Respondents have suggested—as a crafty way to somehow excuse the unconstitutional actions and unlawful H.B. 1 provisions created by the Governor and the legislature—is simply not possible under the procedural rules of Ohio courts or the laws of this state. No budget bill should trump the rule of law, and the Intervenor-Respondents' brazen invitation to subvert the latter should be respectfully declined.

II. Amici Curiae's Propositions of Law No. 2: THE GOVERNOR AND LEGISLATURE'S ATTEMPTED AUTHORIZATION OF AN ENTIRELY NEW FORM OF GAMBLING WAS ULTRA VIRES.

As noted above, the decision of whether or not to legalize any new form of gambling has always been left to the citizens of this state, and not their elected officials. By this fall, the question of gambling expansion will have been justly decided by statewide ballot five separate times in less than twenty years. To date, the people have chosen to reject each proposal.

In this case, the Intervenor-Respondents' argument on the merits resorts to hyperbole. They beg the Court to excuse the unlawful actions of certain state officials because they insist that a democratic vote of the people on the VLT question would "spawn mass mayhem." Int. Merit Brf., p. 3. But this black and white legal question cannot be decided by emotion and hysteria, but by the logic and letter of Ohio law. Both are easily applied here.

A. A VLT is clearly a slot machine—and is not an extension of the "lottery."

Simply stated, the planned implementation of VLTs without a vote of the people is an ultra vires act because VLTs would introduce a brand new form of gambling in Ohio. The Respondents and Intervenor-Respondents seek to obscure this fact by parsing language and pretending that VLTs are somehow merely an innocuous extension of the actual lottery system that was enshrined in the state constitution 34 years ago.² But the argument fails under any objective review. A VLT is not some new outlet to play an official statewide lottery—it is simply a common, stand-alone slot machine. No reasonable person could conclude otherwise.

² While a precise legislative definition of "lottery" does not exist in Ohio, the definition of "lottery" is understood to be more narrow than that of "gambling." Westerhaus Co. v. Cincinnati (1956), 165 Ohio St. 327, 339. Accordingly, many forms of gambling cannot be interpreted as a "lottery".

Indeed, many jurists and journalists have been forthright in their accurate descriptions of the VLT machines. For example, the most recent federal court to describe the device states plainly: “A video lottery terminal or VLT is essentially a computerized slot machine that allows betting on various card games through a video screen interface.” UTGR, Inc. v. Mutuel/Gaming Clerks Union, 2009 U.S. Dist. LEXIS 69378, 2-3, n.2 (D.R.I. Aug. 6, 2009). The South Carolina Supreme Court has spoken to the issue just as plainly: “We find lottery is a term of art and video gaming devices do not come within the plain and ordinary meaning of ‘lottery’ because they do not involve a drawing and ‘tickets’ or other indicium of entitlement to a prize. . . . This Court is constrained to give the words of our Constitution their plain and ordinary meaning.” Johnson v. Collins Entertainment Co., Inc., 333 S.C. 96, 104 (S.C. 1998) (internal citations omitted). The South Dakota Supreme Court reached the same common sense conclusion:

[B]y separately stating the terms ‘game of chance’ and ‘lottery,’ the framers of the original [constitutional] provision intended the term ‘game of chance’ to be broad in scope, including most forms of gaming, and the term ‘lottery’ in the narrower sense contemplating the sale of tokens or tickets to large numbers of people for the chance to share in the distribution of prizes for the purpose of raising public revenue.

Poppen v. Walker, 520 N.W.2d 238, 245 (S.D. 1994).

The Supreme Court of Florida agrees. As summarized in the decision In re Advisory Opinion to Atty. Gen. re Authorizes Miami-Dade and Broward County Voters to Approve Slot Machines in Parimutuel Facilities, 880 So.2d 522, 525-26 (Fla. 2004):

We have long since settled the question of whether slot machines constitute lotteries. In Lee v. City of Miami, 163 So. 486, 490 (1935), we addressed the question of whether certain legislatively described gambling machines, such as slot machines, constituted lotteries prohibited by the state constitution. We concluded they did not. . . We then concluded the ‘primary test’ for a lottery prohibited by the constitution ‘was whether or not the vice of it infected the whole community or country, rather than individual

units of it.' *Id.* . . . Further, the Florida Statutes continue to differentiate the two.

As noted above, journalists have spoken with as much candor as the courts in stating the obvious. Reporting on a speech just delivered by Chief Justice Moyer on August 12, 2009, The Columbus Dispatch noted that the Chief Justice himself referred to the present case as “among the most significant of his 22 years on the state's highest bench.”³ The article stated it “will determine whether Gov. Ted Strickland can order slot machines in racetracks without a vote of the public.” (Emphasis added.) This report’s straightforward characterization is consistent with virtually all other news coverage of the matter, as the media has routinely referred to the VLT provisions of H.B. 1 as simply the legalization of video slots at Ohio racetracks.⁴ Laymen are more plainspoken than many lawyers. However, by the end of their merit brief, perhaps inadvertently, even the Intervenor-Respondents themselves frankly described the VLT as generating a “slots-like game” on an electronic display. *Int. Merit Brf.*, p. 32. Apparently, even they have trouble maintaining their façade.

The Respondents and Intervenor-Respondents request of this Honorable Court a willing suspension of disbelief. That is, they ask the Court to follow their fiction and ignore the obvious, glaring differences between the VLT slot machines and the actual lotteries currently operated by

³ See http://www.dispatchpolitics.com/live/content/local_news/stories/2009/08/13/copy/MOYERART_ART_08-13-09_B3_HHEON3B.html?adsec=politics&sid=101. (Last accessed, August 14, 2009).

⁴ See, e.g., (All sites last accessed, August 12, 2009):

- <http://www.reuters.com/article/CMPSRV/idUSN1053440420090710;>
- <http://www.fox8.com/news/sns-ap-oh--racetrack-slots,0,4752043.story;>
- http://www.dispatch.com/live/content/local_news/stories/2009/06/19/strickland_slots.html;
- <http://www.cleveland.com/news/plaindealer/index.ssf?/base/news/1249979592130840.xml&coll=2;>
- [http://news.cincinnati.com/article/20090619/NEWS0108/306190034.](http://news.cincinnati.com/article/20090619/NEWS0108/306190034)

the Ohio Lottery Commission. But the distinctions are just too clear for the attempted illusion to work.

In their discussion of and citation to the lottery statute, section 3770.03 of the Ohio Revised Code, it is interesting that the Intervenor attempt to deemphasize the phrase “lottery tickets” in the statute by repeatedly omitting it. E.g., Int. Merit Brf., pp. 28, 30. But that language in the statute is deliberately included and is very significant.⁵

The lotteries operated by the Lottery Commission have always been paper based. Intervenor-Respondents attempt to obfuscate this fact by providing elaborate descriptions in their brief of some of their currently operated lottery programs. Int. Merit Brf., pp. 31-32. Yet, the evidence submitted by the Intervenor as brief Exhibits E and F does not help their cause. As shown, all of the current games operated by the Lottery Commission are paper or ticket based. “Slots of Luck,” for example, is nothing more than a traditional scratch-off game, while “EZPlay

⁵ Section 3770.03 of the Ohio Revised Code provides in relevant part:

(B) The commission shall promulgate rules, in addition to those described in division (A) of this section, pursuant to Chapter 119 of the Revised Code under which a statewide lottery and statewide joint lottery games may be conducted. Subjects covered in these rules shall include, but not be limited to, the following: (1) The locations at which lottery tickets may be sold and the manner in which they are to be sold. These rules may authorize the sale of lottery tickets by commission personnel or other licensed individuals from traveling show wagons at the state fair, and at any other expositions the director of the commission considers acceptable. These rules shall prohibit commission personnel or other licensed individuals from soliciting from an exposition the right to sell lottery tickets at that exposition, but shall allow commission personnel or other licensed individuals to sell lottery tickets at an exposition if the exposition requests commission personnel or licensed individuals to do so. These rules may also address the accessibility of sales agent locations to commission products in accordance with the ‘Americans with Disabilities Act of 1990,’ 104 Stat. 327, 42 U.S.C.A. 12101, et seq.”

Poker” is simply a paper ticket consisting of a variety of dealt poker “hands” which are checked against a random assortment of twenty-four cards. Prizes are determined based on the difficulty of obtaining each hand. These statewide paper programs involve no graphics—no bells—no whistles—and no “Vegas-style” action like a VLT slot machine. The latter would be a totally new form of gambling in Ohio. And that decision can be checked by citizen referendum.

B. Ohio Law Expressly Prohibits the Use of Slot Machines, and, Thus VLTs.

As noted above, the reason the Intervenor-Respondents are forced to take the awkward position that the VLT should not be described and classified as what it clearly is—a common slot machine—is because slot machines have long been prohibited by Ohio’s criminal statutes. Ohio Rev. Code § 2915.02 prohibits, in relevant part, establishing, promoting or operating any “scheme of chance,” unless such is expressly permitted by law. Ohio Rev. Code § 2915.01(C) defines “Scheme of chance” as any “slot machine, lottery, numbers game, pool conducted for profit, or other scheme in which a participant gives a valuable consideration for a chance to win a prize.” (Emphasis added.) The very fact that both of these italicized terms are listed in the statute shows the General Assembly distinguishes the two. If there were no difference between a lottery and a slot machine, then the inclusion of “slot machine” would be unnecessary. It is a well-established principle of statutory construction and interpretation that terms joined by the disjunctive “or” must have different meanings because otherwise the statute or provision would be redundant. U.S. v. Hill, 79 F.3d 1477, 1483 (6th Cir. Tenn. 1996).

Though no provision of Ohio law expressly defines a “lottery,” the legislature has provided additional guidance in defining a “slot machine.” First, we know that a skill-based amusement machine is not classified as a “scheme of chance” in section 2915.01(C) of the Ohio Revised Code. Second, we know that skill-based amusement machines are further specifically

distinguished from slot machines in section 2915.01(AAA) of the Ohio Revised Code.⁶ In that section, “skill-based amusement machines” are defined as “a mechanical, video, digital, or electronic device that rewards the player or players, if at all, only with merchandise prizes or with redeemable vouchers redeemable only for merchandise prizes.” Limitations on the value of the merchandise prizes are then set in section 2915.01(AAA)(1) of the Ohio Revised Code.

“Slot machines” are contrasted from these “skill-based amusement machines” by the following:

A [mechanical, video, digital, or electronic] device shall not be considered a skill-based amusement machine and shall be considered a slot machine if it pays cash or one or more of the following apply:

- (a) The ability of a player to succeed at the game is impacted by the number or ratio of prior wins to prior losses of players playing the game.
- (b) Any reward of redeemable vouchers is not based solely on the player achieving the object of the game or the players score;
- (c) The outcome of the game, or the value of the redeemable voucher or merchandise prize awarded for winning the game, can be controlled by a source other than any player playing the game.
- (d) The success of any player is or may be determined by a chance event that cannot be altered by player actions.
- (e) The ability of any player to succeed at the game is determined by game features not visible or known to the player.
- (f) The ability of the player to succeed at the game is impacted by the exercise of a skill that no reasonable player could exercise.

Ohio Rev. Code § 2915.01(AAA)(2) (emphasis added).

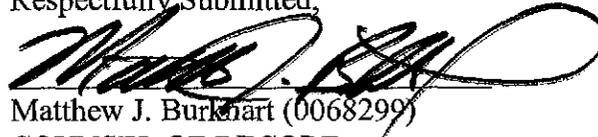
⁶ The fact that the legislature did not perceive a need to distinguish skill-based amusement machines from a lottery provides additional evidence that a lottery and a slot machine are different species.

As dictated by the terms of these statutes and by common sense, the VLT must be classified as a “slot machine.” By definition, the VLT is an electronic device that provides immediate prize determinations, such as cash or a redeemable voucher. And of course, as acknowledged by the Intervenor-Respondents, there is no element of skill involved in succeeding at a VLT. Int. Merit Brf., p.32. It is the Lottery Commission that determines “the price of each game, the prize structure, and the frequency of the payouts on the VLTs.” Id. In spite of their best efforts, the Intervenor-Respondents cannot make a VLT part of the lottery. It would be a complete fiction to declare otherwise.

CONCLUSION

What the Intervenor-Respondents seek in this case is simply unavailable to them. Their requested relief is procedurally inappropriate, and their arguments on the merits are factually inaccurate. For all of these reasons, this Honorable Court should grant the mandamus request of the Relators and allow the VLT gambling expansion provisions of the H.B. 1 budget bill to be taken before the voters of this state through the legitimate referendum process to which they are clearly and expressly entitled.

Respectfully Submitted,



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APPENDIX A

DESCRIPTIONS AND INTERESTS OF AMICI CURIAE:

ATM EDUCATION is a private, non-profit organization is designed to come alongside students, educators, parents and their communities to empower these young people to make healthy decisions based upon medically accurate information and, therefore, maintain the possibility of awesome opportunities for their lives.

BUCKEYE CHRISTIAN SCHOOLS ASSOCIATION is an association of local church-operated Christian schools seeking to maintain and promote high standards of excellence in the operation of Christian schools and in the development of our young people. At the same time, BCSA is helping to pay the price of eternal vigilance which is the price of freedom. These are the building and battling goals of BCSA.

CHURCH COALITION FOR DECENCY is an Ohio organization whose members believe that the citizens' constitutional right to a referendum vote on the issue of gambling expansion should be protected.

CITIZENS FOR COMMUNITY VALUES is a grassroots organization of citizens who are concerned for the well-being of the community, the strength of its families, and the future of its children. It strives to be a leader in the restoration of those Judeo-Christian moral values upon which this country was founded in hopes of leaving a lasting legacy of citizens endeavoring to foster and maintain healthy, wholesome, safe, and happy communities.

CITIZENS MEDIA GROUP/CHRISTIAN CITIZEN USA is an Ohio corporation involved in publishing newspapers and web sites. Citizens Media Group believes the outcome of this case will have consequences throughout the state of Ohio.

CONSTITUTION PARTY OF OHIO The Mission of the Constitution Party is to secure the blessings of liberty to ourselves and our posterity through the election, at all levels of government, of Constitution Party Candidates who will uphold the principles of The Declaration of Independence and The Constitution of The United States.

EAGLE FORUM OF OHIO states that its mission is to enable conservative and pro-family men and women to participate in the process of self-government and public policy making so that America will continue to be a land of individual liberty, respect for family integrity, public and private virtue, and private enterprise.

EISCHEN FINANCIAL GROUP has been teaching financial educational workshops/seminars since 1988. Some topics include, but are not limited to, Legacy/Estate Planning, Retirement Planning, Tax Planning for Investments, Business Planning, Arbitrage and many more.

EVANGELICAL FELLOWSHIP CHAPEL is an Ohio church whose members believe that the citizens' constitutional right to a referendum vote on the issue of gambling expansion should be protected.

FAMILY FIRST PAC is a conservative political action committee serving Ohio and Northern Kentucky. It operates with donations and the volunteer help of citizens who are concerned about our country. Family First is especially concerned with pro-life, pro-marriage, school choice, and fiscal responsibility issues.

GROVE CITY CHURCH OF THE NAZARENE respectfully requests that Ohio voters be given the final word this important issue.

HOMEMAKERS FOR AMERICA The purpose of Homemakers for America is to educate American women and their families on America's history and heritage, promote an understanding and respect for the U.S. Constitution and our founding documents of freedom, inspire an appreciation for our Founding Fathers and their families, cultivate a devotion to our symbols of freedom and allegiance to our citizenship, advance the principles of Liberty this nation was founded on, and teach and guide the women of America how to be actively involved as citizens in their homes, communities and the nation without sacrificing their families.

THE INSTITUTE FOR PRINCIPLED POLICY is a body of like-minded individuals committed to a foundation of Biblical truths. Its goal is to influence the creation and implementation of social, moral and political public policy from the vantage point of a Biblical world-view. The Institute's primary interest is on policies for the state of Ohio.

JOBS PLUS EMPLOYMENT NETWORK exists to facilitate employment for men and women in low income communities and helps them address issues that keep them from achieving success on the job.

MISSION AMERICA as a Christian-based family organization, believes the best interests of America and Ohio are served when citizens are given the opportunity to cast votes about issues that will affect them.

NEW HOPE CHRISTIAN CENTER is an Ohio church whose members believe that the citizens' constitutional right to a referendum vote on the issue of gambling expansion should be protected.

OHIO GOVERNMENTAL PRAYER ALLIANCE is a ministry dedicated to enlisting, encouraging, educating, and mobilizing effective governmental intercessors across the state of Ohio for the purpose of seeing the will and rule of God released within Ohio and the nation.

PASS THE SALT MINISTRIES is committed to bringing together the body of Christ across denominational, racial, and economical borders to demonstrate to America the power of Biblical unity. Our vision is to unite, organize, and mobilize the Army of God to be SALT and Light as stated in MATTHEW 5:12.

RICHLAND COMMUNITY FAMILY COALITION exists to promote the Christian-Judaic values our nation's Founding Fathers established in the public policy sector.

THE RIDGE PROJECT, INC. The mission of the RIDGE Project is to establish a path of honor, discipline, and integrity; by way of education, motivation, and inspiration; in order to lead families into a future defined by hope, peace, and righteousness for generations to come.

ROCKY FORK FORMULAS, INC. believes Ohio citizens should have the final word on this issue.

SANCTITY OF LIFE FOUNDATION exists to protect the dignity of life. The Foundation's members believe that the citizens' constitutional right to a referendum vote on the issue of gambling expansion should be protected.

TOUCH THE WORLD, MINISTRY, INC., states as its mission to facilitate and coordinate existing ministries so that the community may look upward toward God and outward toward His people to solve spiritual and social problems.

VANDALIA UNITED METHODIST CHURCH states that its mission is to make disciples for Jesus Christ and to proclaim the good news of God's grace to all the people in our influence. As disciples we value wise stewardship of our time, talents and money; also being mindful of the environment God has given us.

VICTORY IN TRUTH MINISTRIES believes in the practical application of the Christian faith in everyday experience and the need to minister to people in every area of life, which includes not only the spiritual, but also the social, political, and physical.

WOMEN INFLUENCING THE NATION (WIN) is an organization that believes in the right to life from natural conception to natural death, and that God has supreme rights over everyone. Its challenge is to uncover the lies, reverse the damage, and reclaim the respect for women that has been lost in America today.

PASTOR PETER J. FOXX is an Ohio voter who believes that the citizens' constitutional right to a referendum vote on the issue of gambling expansion should be protected.

STEPHEN J. KOOB is an Ohio voter who believes that the citizens' constitutional right to a referendum vote on the issue of gambling expansion should be protected.

THE HONORABLE RONALD HOOD, FORMER MEMBER OF THE OHIO HOUSE OF REPRESENTATIVES, is an Ohio voter who believes that the citizens' constitutional right to a referendum vote on the issue of gambling expansion should be protected.

THE HONORABLE TWYLA ROMAN, FORMER MEMBER OF THE OHIO HOUSE OF REPRESENTATIVES, is an Ohio voter who believes that the citizens' constitutional right to a referendum vote on the issue of gambling expansion should be protected.

PASTOR WAYNE W. SCOTT is an Ohio voter who believes that the citizens' constitutional right to a referendum vote on the issue of gambling expansion should be protected.