

GUIDE TO WRITING ARGUMENTS, REBUTTALS AND ANALYSES FOR LOCAL MEASURES



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This guide was developed in an effort to provide answers to questions frequently asked of the Madera County Elections Department concerning arguments, rebuttals, and analyses for local measures. It is for general information only and does not have the force and effect of law, regulation, or rule. In case of conflict, the law, regulation, or rule will apply. Persons using this guide must bear full responsibility to make their own determinations as to all legal standards and duties. For more information on city measures, please contact your city clerk.

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GENERAL INFORMATION

What is a local county measure?

For purposes of this guide, a local measure is any question put before voters at any election in the county, special district or school district. Measures can be placed on the ballot by the governing body or by initiative or referendum.

How do I know a measure will appear on the ballot?

Once the governing board such as the Board of Supervisors, school board or special district board pass a resolution calling for an election, the county elections official will prepare and publish a legal notice indicating the specifics of the measure including deadlines to file arguments for or against the measure. The county elections official will also do news release announcing the measures on the ballot and deadlines for filing arguments.

Whom do I contact regarding local measures?

Contact the Madera County Elections Department at:

- Address: 200 W. 4th Street, Suite 1100, Madera, CA 93637
- Phone: (559) 675-7720
- Website: www.votemadera.com
- Email: electionsinfo@madera-county.com

What is a state proposition?

A state proposition is a proposal affecting the State Constitution or laws of the state. A proposition can be placed on the ballot by the State Legislature passing a law and the Governor signs it or by initiative or referendum.

Whom do I contact regarding state propositions?

For information on state propositions, contact the California Secretary of State's Office, Elections Division, at (916) 657-2166 or visit their website at www.sos.ca.gov.

What is a city measure?

A city measure is any question put before voters at any election in the city. There are 10 incorporated cities in Madera County. For information on a city measure, please contact the respective [city clerk](#) of that city.

City Contact Information

CITY:	ADDRESS:	TELEPHONE:
Madera	205 West 4th Street Madera, CA 93637	(559) 661-5400
Chowchilla	130 South 2nd Street Chowchilla, CA 93610	(559) 665-8615

ARGUMENTS FOR AND AGAINST

Who can file arguments?

- The governing board: Board of Supervisors, school board or special district board. An argument may also be filed by a member of members of the governing body. The member(s) do NOT have to be authorized by the governing body; or
- The individual voter, or bona fide association of citizens, or combination of voters and associations, who are the bona fide sponsors or proponents of the measure; or
- A bona fide association of citizens; or
- Any individual voter who is eligible to vote on the measure. (Elections Code §§9120, 9160, 9162, 9282, 9501)

If more than one argument for or against any county, district or school measure is submitted, the county elections official shall select one for printing in the Voter's Information Guide pursuant to the order listed above. (Elections Code §§9166, 9167, 9503)

When a jurisdiction crosses county lines, the lead county (the one with the most voters) will be responsible for setting the deadlines for arguments. Filers are advised to file their argument for or against the measure with the lead county. If there is more than one argument for or against filed, the lead county will select one pursuant to the provisions above. Therefore, the same argument for or against measures in shared jurisdictions will be identical in each county.

*Exception for district measures put on the ballot by initiative:

- The persons filing a district initiative petition may file an argument in favor of the proposed ordinance. The district board may submit an argument against the ordinance. (Elections Code §9315)

Filer vs. Signers

- The **filer** does not have to be a **signer** of the argument.
- **Anyone can sign** arguments for or against a county, school, or special district measure.
- The **filer** of the argument must meet the criteria above in *Who can file arguments?*

Filers

Filers include the governing board (i.e. Board of Supervisors, school board or special district board) or member of members of the legislative body authorized by the legislative body, or any individual voter who is eligible to vote on the measure, or bona fide association of citizens, or any combination of these voters and associations may file a written argument for or against any county, school or district measure placed on the ballot by the governing body or county initiatives placed on the ballot through the petition process. (Elections Code §§9120, 9160, 9162, 9282, 9501)

Signers

Signers of arguments for or against a county, school, or special district measure do not have to meet the criteria listed above. The filer of the argument must meet the criteria above; however, anyone may sign the argument.

There is a distinction between a "filer" and a "signer or author." The filer of the argument or rebuttal must be either the governing board of the district, a bona fide association of citizens or an individual voter who is eligible to vote on the measure. The "signers or authors" of the argument or rebuttal can be any person or any organization accompanied by a signature of a principal officer. Filers do not have to be signers.

Format for primary arguments

- Arguments must not exceed 300 words. (Elections Codes §9162, 9282, 9315, 9501)
*See [APPENDIX A](#) for guidelines in counting words.
- Arguments shall use the following headings:
 - “Argument For Measure ____”
 - “Argument Against Measure ____”

Note: The heading and the signatures are not included in the word count. (Elections Code §9162)

- Arguments cannot contain more than five (5) signatures on the **Required Form Statement** (Elections Codes §9164, 9283, 9501.5). See [APPENDIX D](#) to review the form statement.
- Arguments should be typed and in a block format. See [APPENDIX B](#) for more information.
- Arguments should be emailed to electionsinfo@madera-county.com in a Microsoft Word file.

Required Form Statement (signatures)

- Each **argument** and **rebuttal** must be filed with the **original wet signatures** on the **Required Form Statement** contained in this guide (Elections Code §9600).
- It shall contain the printed name and wet signature or printed names and wet signatures of the person or persons submitting it or, if submitted on behalf of an organization, the name of the organization and the printed name and signature of at least one of its principal officers. (Elections Code §§9164, 9283, 9501.5).
- If filing on behalf of a bona fide association of citizens, an organization or association, a copy of one of the following must be submitted with argument (Elections Codes §§9166, 9287, 9503):
 - 1) Its articles of incorporation, articles of association, partnership documents, bylaws, or similar documents; or
 - 2) Letterhead containing the name of the organization and its principal officers; or
 - 3) If the organization or association is a primarily formed committee established to support or oppose the measure, its statement of organization filed pursuant to Section 84101 of the Government Code.

- If the original signatures cannot be submitted by the deadline, you may FAX or EMAIL the argument/rebuttal with the signature/s on the same page as the text of the argument/rebuttal. Original signatures must be presented to the elections official within 48 hours of electronic transmission or the item(s) will not be considered as filed (weekends and holidays excepted).

REBUTTALS TO ARGUMENTS

Who can file rebuttals to arguments?

When both an argument in favor and an argument against a measure has been filed and selected for printing in the voter information guide, the county elections official will send copies of the arguments to the filers and advise them of the deadline for filing the rebuttal.

Format for rebuttal to arguments

- Rebuttals must not exceed 250 words. (Elections Codes §9167, 9285, 9317, 9504)
*See [APPENDIX A](#) for guidelines on counting words.

- Rebuttals shall use the following headings:
 - “Rebuttal to Argument for Measure ____”
 - “Rebuttal to Argument Against Measure ____”

Note: The heading and the signatures are not included in the word count. (Elections Code §9162)

- Rebuttals cannot contain more than five (5) signatures on the **Required Form Statement**.
- Rebuttals *may be* signed by the same people who signed the argument, or the filer can authorize up to five (5) new people to sign the rebuttal by completing the **Authorization Form for Change in Signer(s) of Rebuttal Arguments** ([APPENDIX E](#)) along with the **Required Form Statement** in [APPENDIX D](#).
- Rebuttals should be typed and in a block format. See [APPENDIX B](#) for more information.
- Rebuttals should be emailed to electionsinfo@madera-county.com in a Microsoft Word file.

Required Form Statement (signatures)

- All rebuttal arguments must be filed with the **original wet signatures** on the **Required Form Statement** contained in this guide (Elections Code §9600).
- It shall contain the printed name and wet signature or printed names and wet signatures of the person or persons submitting it or, if submitted on behalf of an organization, the name of the organization and the printed name and signature of at least one of its principal officers. (Elections Code §§9164, 9283, 9501.5).
- If filing on behalf of a bona fide association of citizens, an organization or association, a copy of one of the following must be submitted with argument (Elections Codes §§9166, 9287, 9503):
 - 4) Its articles of incorporation, articles of association, partnership documents, bylaws, or similar documents; or
 - 5) Letterhead containing the name of the organization and its principal officers; or
 - 6) If the organization or association is a primarily formed committee established to support

or oppose the measure, its statement of organization filed pursuant to Section 84101 of the Government Code.

- If the original signatures cannot be submitted by the deadline, you may FAX or EMAIL the argument/rebuttal with the signature/s on the same page as the text of the argument/rebuttal. Original signatures must be presented to the elections official within 48 hours of electronic transmission or the item(s) will not be considered as filed (weekends and holidays excepted).

Authorization Form for Change in Signer(s) of Rebuttal Arguments

If there will be new signers for the rebuttals to arguments, it is required that the primary argument signers complete the **Authorization Form for Change in Signer(s) of Rebuttal Arguments** contained in this guide. (Elections Codes §§9167, 9285, 9317, 9504)

- The **Authorization Form for Change in Signer(s) of Rebuttal Arguments** is signed by the primary argument signers ([APPENDIX E](#)).
- The **Required Form Statement** is signed by the new rebuttal signers ([APPENDIX D](#)).
- Both the **Authorization Form for Change in Signer(s) of Rebuttal Arguments** and **Required Form Statement** MUST BE FILED at the time of filing the rebuttal.

ANALYSIS

Impartial Analysis

County Counsel is required to prepare an impartial analysis of a county or school measure. (Elections Codes §§9160, 9500).

The City Attorney shall prepare an impartial analysis of a city measure (Elections Code §9280).

For special district initiatives, the county counsel or district attorney of the county with the largest number of registered voters shall prepare an impartial analysis (Elections Code §9313).

The impartial analysis must not exceed 500 words (Elections Code §9160, 9280, 9313, 9314, 9500, Water Code Appendix §124-415).

If the district is a water district, the counsel for the water district, or if there is no counsel for the water district, the county counsel of the county with the largest number of registered voters shall prepare an impartial analysis. If there is a legal counsel for the water district, the analysis shall be subject to review and revision by the county counsel (Elections Code §9314).

The following items are to be included in the impartial analysis:

- 1) Indicate how the measure was placed on the ballot (Elections Codes §§ 9160(b), 9280, 9313, 9314, 9500(b))
 - a. by a petition signed by the requisite number of voters, or
 - b. by the board of supervisors (for county measures), or
 - c. by the governing body (for city or district measures).
- 2) The county counsel or district attorney **may** indicate (Elections Code 9160(b)(2)):
 - a. What a **YES** vote means?
 - b. What a **NO** vote means?
- 3) If the full text of the resolution is not to be printed in the voter information guide, the following language should be included in the resolution (Elections Code §§ 9160(b)(3), 9280, 9313, 9314):
 - a. "The above statement is an impartial analysis of Ordinance or Measure _____. If you desire a copy of the ordinance or measure, please call the elections official's office at (insert telephone number) and a copy will be mailed at no cost to you."

Fiscal Analysis

The County Auditor-Controller may be requested by the Board of Supervisors no later than 88 days prior to an election to prepare a fiscal analysis of a county measure (Elections Code §9160(c)).

The fiscal impact statement shall not exceed 500 words (Elections Code §9160(c)).

The County Auditor-Controller shall prepare a fiscal impact statement which estimates the amount of any increase or decrease in revenues or costs to the county if the proposed measure is adopted (Elections Code §9160(c)).

Tax Rate Statement

Each bond measure proposed by a county, city, district or other political subdivision or by any agency, department, or board thereof, the security of which constitutes a lien on the property within the jurisdiction, shall mail a tax rate statement with the county voter information guide (Elections Codes §9400, 9401).

The statement shall be filed with the elections official not later than the 88th day prior to the election. The law does not specify a word limit for such statements.

The following items are to be included in the tax rate statement:

- 1) The best estimate from official sources of the **average annual tax rate that would be required to be levied to fund that bond issue over the entire duration of the bond debt** service, based on assessed valuations available at the time of the election or a projection based on experience within the same jurisdiction or other demonstrable factors. The **estimate shall also identify the final fiscal year in which the tax is anticipated to be collected** (Elections Code §9401(a)(1)).
- 2) The best estimate from official sources of the **highest tax rate that would be required to be levied to fund that bond issue, and an estimate of the year in which that rate will apply**, based on assessed valuations available at the time of the election or a projection based on experience within the same jurisdiction or other demonstrable factors (Elections Code §9401(a)(2)).
- 3) The best estimate from official sources of the **total debt service, including the principal and interest, that would be required to be repaid if all the bonds are issued and sold**. The estimate may include information about the assumptions used to determine the estimate (Elections Code §9401(a)(3)).

The statement **may** contain a declaration of policy of the legislative or governing body of the applicable jurisdiction, proposing to use revenues other than ad valorem taxes to fund the bond issue, and the best estimate from official sources of these revenues and the reduction in the tax rate levied to fund the bond issue resulting from the substitution of revenue (Elections Code §9401(b)).

ORDER OF APPEARANCE IN VOTER INFORMATION GUIDE

Arguments, rebuttals and analyses are printed in the voter information guide and mailed to all registered voters in the jurisdiction eligible to vote for the particular measure. The arguments will appear in the following order:

- 1) Ballot question
- 2) What a Yes vote means, What a No vote means
- 3) Names of who signed the argument for and argument against
- 4) Analysis
- 5) Fiscal Analysis or Tax Rate Statement
- 6) Argument in Favor
- 7) Rebuttal to Argument in Favor
- 8) Argument Against
- 9) Rebuttal to Argument Against
- 10) Full Text of Measure

Lettering of Measures

Letters designating measures will be assigned by the elections official pursuant to Elections Code §13116.

Letters will be assigned after the close of consolidations, which occurs 88 days before the election.

Measures will be assigned in alphabetical order beginning with the letter following the last letter assigned in the previous election and continuing through Z, or as close to the end of the alphabet as possible to accommodate all measures filed for the current election. For example, if the previous election ended with measure V, and five measures are on the next ballot, the measures will be assigned A, B, C, D, E rather than W, X, Y, Z, A.

For districts that overlap into other counties, the counties will mutually agree to use a letter designation for the measure that will not conflict or confuse the voter. The letter assigned to these measures may not be in alphabetical order.

Measures will appear on the ballot in the following order pursuant to Elections Code §13109:

- County Board of Education
- College
- Unified Schools
- High Schools
- Elementary Schools
- County
- Cities
- Districts

In order to allow for the most efficient use of space, the county elections official may vary the order of the measures (Elections Code §13116(o)).

DEADLINES

Contact the Elections Office at (559) 675-7720 or visit our website at www.votemadera.com for filing deadlines for a particular measure. For city measures, please contact the respective city clerk.

Arguments: Arguments are due by 5 p.m. on the deadline date chosen by the Elections Office. Once an argument for and against a measure is chosen, a copy will be provided to the opposing signers for the purpose of writing a rebuttal. Arguments are available to the public after the 5 p.m. deadline.

Tax Rate Statement: Tax Rate Statements must be supplied for each bond issue proposed by a county, city, district or other political subdivision. The statement shall be filed with the elections official not later than the 88th day prior to the election. Statements are available to the public after the 5 p.m. deadline.

Rebuttals: 10 days after the argument is due, rebuttals are due by 5 p.m. Rebuttals are available to the public after the 5 p.m. deadline.

Analysis: County Counsel prepares an impartial analysis of each measure and it is filed on the same day as rebuttals are due. Analyses are public after the 5 p.m. deadline.

Place to File: Madera County Elections Department, 200 West 4th Street, Suite 1100, Madera, CA 93637, (559) 675-7720.

To help us cut costs and to ensure documents are printed exactly as filed, in addition to filing a hard copy, please email your argument, rebuttal or analysis to: electionsinfo@madera-county.com

Filing by FAX: Signatures on arguments, rebuttals and analyses must appear on the same page as the text of the argument, rebuttal or analysis. **Original signatures must be presented to the elections official within 48 hours of transmission or the item(s) will not be considered as filed** (weekends and holidays excepted). Faxing must be started prior to 5 p.m. on deadline days to be accepted as filed. The FAX number is (559) 675-7870. To email, you must scan the document with the signature and email to: electionsinfo@madera-county.com

Confidentiality: Arguments, rebuttals and analyses shall remain confidential until 5 p.m. on the date they are due.

Withdrawal/Changes: Arguments, rebuttals and analyses may be changed or withdrawn until and including the date fixed for final submission to the county elections office (Elections Code §9163, 9316, 9601).

Public Inspection: For 10 calendar days immediately following the deadline for final submission of election documents, including ordinances, analyses, arguments and rebuttals, the county elections official shall make a copy of the materials available for public inspection. A writ of mandate or injunction may be sought to require amendments or deletions to any or all of the materials (§9190, 9295, 9380, 9509).

APPENDIX A – How to Count Words

Each word is counted as one word except:

Punctuation	Punctuation is not counted.
Titles	Words used by the Elections Department as part of a standardized heading, such as “Argument in Favor of Measure Z” or “Statement of Candidate for Mayor” are not counted.
Cities/Counties	All geographical names shall be counted as one word. For example, “Monterey County”, “City of Salinas”, “County of Santa Cruz”, and “City and County of San Francisco” are considered one word. The names of school districts, special districts and political subdivisions are considered geographical names as well. For example, “North County Fire Protection District” and “Monterey Peninsula Community College District” are each one word.
Proper Nouns	All proper nouns, including geographical names, shall be considered as one word; for example, “City and County of San Francisco” or “Salinas High School” shall be counted as one word. (Generic location terms such as “North County” or “South County” do not constitute proper nouns and each word will be counted separately)
Abbreviations	Each abbreviation for a word, phrase, or expression shall be counted as one word.
Hyphenations	Hyphenated words that appear in any generally available U.S. dictionary published in the last 10 years shall be considered as one word. Each part of all other hyphenated words shall be counted as a separate word. Elections has a dictionary on hand and will reference this dictionary as the deciding factor.
Dates	Dates consisting of a combination of words and digits shall be counted as two words. Dates consisting of only a combination of digits shall be counted as one word. October 29, 2007 shall be counted as two words, whereas 10/29/2007 will be counted as one word.
Numbers	Any number consisting of a digit or digits shall be considered as one word (i.e. “100”). Any number that is spelled shall be considered as a separate word (“one hundred” is two words).
Phone & Internet	Website addresses or telephone numbers are one word.
Percent Signs (%), Number Signs (#), etc.	It is department policy to count numbers consisting of a digit or digits used with a dollar sign (\$), cent sign (¢), percentage sign (%), or number sign (#) as one word.

APPENDIX B – Format Guidelines

- Be accurate. **Documents will be printed as submitted.** Spelling, punctuation, and grammatical errors will not be corrected by elections office staff.
- An argument, rebuttal, analysis or tax rate statement must be written to address a single measure on the ballot. A document combining statements pertaining to more than one measure will not be accepted.
- All arguments and rebuttals must be accompanied by a **Required Form Statement** (signatures) (Elections Code §9600). See [APPENDIX D](#) for more information.
- No more than five signatures will appear with any argument. If more than five are submitted, the first five will be printed (Elections Codes §9164, 9283, 9501.5).
- Arguments, rebuttals, analyses and tax rate statement, including the names and titles of the signers, must be typed to ensure quality and accuracy.
- Do not use profanity or other objectionable language.
- The heading is standardized (see [APPENDIX C](#) for standardized headings). Subheadings and deviations from the standardized heading will not be accepted.
- Arguments, rebuttals, analyses and tax rate statements are printed in the voter information guide in 9.5 point Arial or Arial Narrow font – no exceptions.
- Limited use of **bolding**, CAPITALIZING, underlining, *italics*, centering text, and bullets (small solid circle only) are permitted.

APPENDIX C – Standardized Headings

Headings will be on the left margin, and printed using all sentence case in 12-point, bold font.

Ballot question: (Voter Information Guide)	Title of ballot question (if provided). If there is no title, the 75-word ballot question will be printed in upper and lower case. Bullets, italics, underlining, and bolding beyond the title, are not permitted in the ballot question.
	What a yes vote means, What a no vote means
	Names of who signed the argument in favor of and against
Analyses:	Impartial analysis of Measure Z If the full text of the resolution is not to be printed in the voter information guide, the following language should be included in the resolution (Elections Code §§ 9160(b)(3), 9280, 9313, 9314): The above statement is an impartial analysis of Measure Z. If you desire a copy of the ordinance or measure, please visit our website at www.votemadera.com or call the Madera County Elections Department at (559) 675-7720 and a copy will be mailed at no cost to you.
	Fiscal impact statement of Measure Z
	Tax rate statement of Measure Z
Argument in favor:	Argument in favor of Measure Z Rebuttal to argument in favor of Measure Z
Argument against:	Argument against Measure Z Rebuttal to argument against Measure Z
Measure text: (Voter Information Guide)	Full text of Measure Z Text.....
Initiative: (Voter Information Guide)	Full text of initiative Measure Z Text.....
Ballot:	MEASURE SUBMITTED TO THE VOTERS COUNTY Z 75-word ballot question... (§13247) YES NO
	If the measure is a school bond, the ballot would read: "Bonds Yes" and "Bonds No" (Education Code §15122).

APPENDIX D – Required Form Statement

A ballot argument shall not be accepted unless accompanied by the printed name and signature or printed names and signatures of the person or persons submitting it, or, if submitted on behalf of an organization, the name of the organization and the printed name and signature of at least one of its principal officers (Elections Code §§9164, 9283, 9501.5).

No more than five signatures shall appear with any argument submitted under this article. In case any argument is signed by more than five persons, the signatures of the first five shall be printed (Elections Code §§9164, 9283, 9501.5).

All arguments concerning measures filed pursuant to this division shall be accompanied by the following form statement, to be **signed by each proponent** of the argument (Elections Code §9600):

“The undersigned proponent(s) or signer(s) of the:

- Primary argument in favor
- Rebuttal to argument in favor
- Primary argument against
- Rebuttal to argument against

ballot measure (*insert letter*) _____ at the Primary General Special

election for the _____
(jurisdiction – name of district)

to be held on _____ hereby state that this argument is true and
(Election date)

correct to the best of his/her/their knowledge and belief.”

Signatures of proponents (in order of appearance in the voter information guide):

- (1) Printed Name _____ Title (one) _____
Signature _____ Date _____
- (2) Printed Name _____ Title (one) _____
Signature _____ Date _____
- (3) Printed Name _____ Title (one) _____
Signature _____ Date _____
- (4) Printed Name _____ Title (one) _____
Signature _____ Date _____
- (5) Printed Name _____ Title (one) _____
Signature _____ Date _____

Filer:

- (1) Printed Name _____ Title (one) _____
Signature _____ Date _____

Primary Contact Information: _____

APPENDIX E – Authorization Form for Change in Signer(s) of Rebuttal Arguments

PLEASE ONLY COMPLETE SECTIONS THAT ARE APPLICABLE

Authorization must be provided by the original signer(s) of the primary argument(s) in favor of or against the specified measure, when a different person(s) will prepare, submit or sign the rebuttal argument (Elections Codes §§9167, 9285, 9317, 9504).

To be completed by the signer(s) of the Primary Argument

“The undersigned or signer(s) of the:

- Primary argument in favor Primary argument against

ballot measure (*insert letter*) _____ at the Primary General Special

election to be held on _____ authorize(s) the following
(Election date)

individual(s) to sign the Rebuttal Argument in his/her/their place:

- | | | | | |
|-----|---|--------------------|---|---------------------|
| (1) | <small>Print name of Rebuttal Argument signer</small> | to sign instead of | <small>Signature of Primary Argument signer</small> | <small>Date</small> |
| (2) | <small>Print name of Rebuttal Argument signer</small> | to sign instead of | <small>Signature of Primary Argument signer</small> | <small>Date</small> |
| (3) | <small>Print name of Rebuttal Argument signer</small> | to sign instead of | <small>Signature of Primary Argument signer</small> | <small>Date</small> |
| (4) | <small>Print name of Rebuttal Argument signer</small> | to sign instead of | <small>Signature of Primary Argument signer</small> | <small>Date</small> |
| (5) | <small>Print name of Rebuttal Argument signer</small> | to sign instead of | <small>Signature of Primary Argument signer</small> | <small>Date</small> |

Filer:

- | | | | |
|-----|--------------|-------------|--|
| (1) | Printed Name | Title (one) | |
| | Signature | Date | |

Primary Contact Information: _____

****Attach this form to the “Required Form Statement” submitted with the rebuttal argument.***