

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Oregon

DONICE NOELLE SMITH

Plaintiff(s)

v.

CHRISTINE KOTEK, Governor of Oregon, in her official capacity; TOBIAS READ, Secretary of State of Oregon, in his official capacity; DENA DAWSON, Director of the Oregon Elections Division, in her official capacity;

Defendant(s)

Civil Action No. 6:26-cv-01659-AP

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Tobias Read, Secretary of State of Oregon, in his official capacity
Oregon Secretary of State
900 Court Street NE, Suite 136
Salem, OR 97310

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Donice Noelle Smith, Plaintiff Pro Se
4601 Carnes Rd., STE 8 #112
Roseburg, OR 97471
Telephone: (541) 530-3420
Email: freedomlady1776@proton.me

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

Date: 09/03/2026



MELISSA AUBIN, Clerk of Court

By: s/J. Wall, Deputy Clerk

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v.

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Oregon, in his official capacity; DENA DAWSON,
Director of the Oregon Elections Division, in her official

Defendant(s)

Civil Action No. 6:26-cv-01659-AP

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Dena Dawson, Director, Oregon Elections Division, in her official capacity
Oregon Elections Division
255 Capitol Street NE, Suite 126
Salem, OR 97310

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Donice Noelle Smith, Plaintiff Pro Se
4601 Carnes Rd., STE 8 #112
Roseburg, OR 97471
Telephone: (541) 530-3420
Email: freedomlady1776@proton.me

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Plaintiff(s)

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Director of the Oregon Elections Division, in her offici

Defendant(s)

Civil Action No. 6:26-cv-01659-AP

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Christine Kotek, Governor of Oregon, in her official capacity
Office of the Governor
900 Court Street NE, Suite 254
Salem, OR 97301-4047

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Donice Noelle Smith, Plaintiff Pro Se
4601 Carnes Rd., STE 8 #112
Roseburg, OR 97471
Telephone: (541) 530-3420
Email: freedomlady1776@proton.me

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MELISSA AUBIN, Clerk of Court

By: s/J. Wall, Deputy ClerkDate: 09/03/2026

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

Case No. 6:26-cv-01659-AP

DONICE NOELLE SMITH,
Plaintiff,

v.

CHRISTINE KOTEK, Governor of Oregon,
in her official capacity;

TOBIAS READ, Secretary of State of Oregon, in his official capacity;

DENA DAWSON, Director of the Oregon Elections Division, *in her official capacity,*
Defendants.

**COMPLAINT FOR DECLARATORY, INJUNCTIVE, AND EQUITABLE
RELIEF ARISING FROM THE UNEQUAL ADMINISTRATION OF
MANDATORY CONSTITUTIONAL QUALIFICATIONS FOR PUBLIC
OFFICE**

I. INTRODUCTION

This action challenges Defendants' continuing administration of Article II, Section 22 of the Oregon Constitution under a constitutional interpretation that Plaintiff alleges became inconsistent with *Multnomah County v. Mehrwein*.¹

¹ *Multnomah County v. Mehrwein*, 366 Or. 295, 314, 322–26, 332–33, 462 P.3d 706 (2020) (reconsidering and overruling *Vannatta v. Keisling* to the extent *Vannatta* treated campaign-contribution limits as categorically subject to facial invalidation under Article I, section 8, and holding that the challenged contribution limits were not facially invalid under the governing *Robertson* framework).