

# 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 the Merced County Registrar of Voters 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.

# General Information

All Sections cited are from the [California Elections Code \(EC\)](#)

## What is a local measure?

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

## Whom do I contact regarding local measures?

Merced County Registrar of Voters:

2222 M Street

Merced, CA 95340

209-385-7541 Fax 209-385-7387

[www.mercedelections.org](http://www.mercedelections.org) / [elections@countyofmerced.com](mailto:elections@countyofmerced.com)

## What is a city measure?

A city measure is any question put before voters at any election in the city. There are six incorporated cities in Merced County

## Whom do I contact regarding city measures?

Arguments, rebuttals and analyses for city measures are filed with the City Clerk of the city involved. Specific information regarding requirements and deadlines may be obtained from the city office involved.

City of Atwater	209-357-6300	<a href="http://www.atwater.org">www.atwater.org</a>
City of Dos Palos	209-392-2174	<a href="http://www.cityofdospalos.org">www.cityofdospalos.org</a>
City of Gustine	209-854-6471	<a href="http://www.cityofgustine.com">www.cityofgustine.com</a>
City of Livingston	209-394-8041	<a href="http://www.livingstoncity.com">www.livingstoncity.com</a>
City of Los Banos	209-827-7000	<a href="http://www.losbanos.org">www.losbanos.org</a>
City of Merced	209-388-8650	<a href="http://www.cityofmerced.org">www.cityofmerced.org</a>

# Definition of Terms Used in This Guide

Argument - A 300 word statement IN FAVOR OF or AGAINST a Measure.

Author of an Argument – A Proponent of a Measure, an individual voter, a bona fide association of citizens, or any combination of bona fide associations and individual voters who write text of the Argument IN FAVOR OF or AGAINST a Measure.

Authorization for Signers – A form which needs to be completed by the Authors and filed with the Registrar of Voters if they wish to allow others to sign the Argument IN FAVOR OF or AGAINST a Measure on their behalf. For Rebuttal Arguments, the Signers of the Argument IN FAVOR OF or AGAINST a Measure may authorize others to sign. A Letter of Authorization may also be used for this purpose.

Bona Fide Association of Citizens – A recognized group of citizens bound together by a common interest or cause.

Committee – Any person or combination of persons who, directly or indirectly, receive contributions or make expenditures or contributions to support or oppose a Measure.

County Voter Information Guide – A guide mailed to each registered voter prior to an election. It contains information on candidates, measures, and instructions for voting. In addition, a sample of the ballot may be included.

Elections Official – The Merced County Registrar of Voters office.

Electoral Jurisdiction – The district or area in which the Measure will be voted upon.

Filer of an Argument IN FAVOR OF or AGAINST a Measure – The Author of the Argument or any person the Author authorizes to file the Argument.

Proponent of a Measure – A person or persons who initiate(s) the initiative petition process, and has control of the circulation and signature collection for the petition. The Proponent can also be the Merced County Board of Supervisors for a countywide Measure in this county. A Proponent of a Measure can author an Argument IN FAVOR of their sponsored Measure.

Public Review Period – Following the deadline for filing Arguments IN FAVOR OF or AGAINST a Measure, Rebuttal Arguments, Impartial Analysis, Fiscal Impact Statement and Tax Rate Statement, the public has 10 calendar days to review these documents at the Registrar of Voters' office.

Rebuttal Argument – A 250 word statement which refutes an Argument IN FAVOR OF or AGAINST a Measure.

Signature Statement – A form which must be submitted with each original Argument IN FAVOR OF or AGAINST and Rebuttal Argument to the Elections Official. It includes information on each Signer of the Argument.

Signer of Argument IN FAVOR OF or AGAINST a Measure – The Author of the Argument IN FAVOR OF or AGAINST a Measure or any person the Author authorizes in writing to sign the Argument.

Signer of the Rebuttal Argument – The signer of the Argument IN FAVOR OF or AGAINST a Measure unless the signer of the Argument IN FAVOR OF or AGAINST a Measure authorizes in writing another person to sign the Rebuttal Argument.

Writ of Mandate – A written order issued by a Superior Court commanding a public Official or body or a lower court to perform or cease to perform a specific duty or action.

# Arguments For and Against

## Introduction

Whenever any county, city, school, or special district measure qualifies for placement on the ballot, written arguments for and against the measure may be filed. This guide has been prepared to assist with the preparation and filing of arguments and rebuttals. Arguments pertaining to county, school, or special district measures are filed with the County Elections Division. For information on a city measure, contact the City Clerk. For information on state propositions, contact the Elections Division of the Secretary of State's office.

## 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.

## 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 or 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. [EC §§9120, 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 Information Guide pursuant to the order listed above. [EC §§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. (County policy)

## Exceptions for district or city 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. [EC §9315](#)
- The persons filing a city initiative petition may file an argument in favor of the proposed ordinance and the city council may submit an argument against the ordinance. [EC §9282\(a\)](#)

## 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 (See 'Who can file arguments?').
- All arguments and rebuttals must be filed with the Signature Statement contained in this handbook.

## Format for Arguments [EC §9162](#)

- Arguments must not exceed 300 words. See Attachment A for guidelines on counting words.
- Arguments shall use the following headings:  
Argument in Favor of Measure\_\_\_\_\_
- Argument Against Measure\_\_\_\_\_
- Arguments cannot contain more than five signatures.
- The heading and the signatures are not included in the word count.
- Arguments should be typed and in a block format. See Attachment B for more information.
- Arguments should be emailed to [elections@countyofmerced.com](mailto:elections@countyofmerced.com) in Word or a text file.

## Signature Statement [EC §9600](#)

- Each **argument** and **rebuttal** must be accompanied by the two-page Signature Statement included in this Guide.
- Multiple Signature Pages can be submitted with at least one Signature per page.
- We must have original signatures. To meet 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).
- 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.

# Rebuttals [EC §§9167, 9220, 9285, 9317 & 9504](#)

## 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 Rebuttals

- Rebuttals must not exceed 250 words. See Attachment A for guidelines on counting words.
- Rebuttals shall use the following headings:  
Rebuttal to Argument in Favor of Measure \_\_\_\_\_  
Rebuttal to Argument Against Measure \_\_\_\_\_
- Rebuttal arguments may be signed by the same people who signed the argument, or the filer can authorize up to five new people to sign the rebuttal by completing the Authorization in Attachment E
- Rebuttals can be signed by five or fewer people.
- The heading and the signatures are not included in the word count. [EC §9162\(c\)](#)
- Rebuttals should be typed and in a block format. See Attachment B for more information.
- Rebuttals should be emailed to [elections@countyofmerced.com](mailto:elections@countyofmerced.com) in Word or a text file.

# Analyses

## Impartial Analysis

- County Counsel is required to prepare an impartial analysis of a county or school measure. County Counsel for each individual county will prepare the analysis for any measure proposed by a jurisdiction that crosses county lines. [EC §§9160 & 9500](#)
- The City Attorney shall prepare an impartial analysis of a city measure. [EC §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. [EC §9313](#)
- The impartial analysis must not exceed 500 words. [EC §§9160, 9313, 9314 & 9500](#)
- 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. [EC §9314](#)

## Fiscal Analysis

- The County Auditor-Controller & Treasurer-Tax Collector 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. [EC §9160](#)
- The fiscal impact statement shall not exceed 500 words. [EC §9160](#)

## 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. 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. [EC §§9400 & 9401](#)



# Order and Lettering

## 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 information will appear in the following order:

1. Ballot Question
2. Impartial Analysis
3. Tax Rate Statement (if applicable)
4. Argument in Favor
5. Argument Against
6. Rebuttal to Argument in Favor
7. Rebuttal to Argument Against
8. Full Text of the Measure

## Lettering of Measures

Letters designating measure will be assigned by the elections official pursuant to [EC §13116](#). Letters will be assigned after the close of consultations, which occurs 88 days prior to 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.

Measure will appear on the ballot in the following order pursuant to [EC §13109](#):

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

# Deadlines

Contact the Merced County Registrar of Voters Department at 209-385-7541 or visit our website at [www.mercedelections.org](http://www.mercedelections.org) for filing deadlines for a particular measure.

**Arguments:** Arguments are due by 5:00 p.m. on the deadline date chosen by the Merced County Registrar of Voters Department. Once an argument for and against a measure is chosen, a copy will be provided to the opposing authors for the purpose of writing a rebuttal. Arguments are available to the public after the 5:00 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 5:00 p.m. deadline

**Rebuttals:** Rebuttals are due by 5:00 p.m. on the deadline date chosen by the Merced County Registrar of Voters Department. Typically it is about a week after the date the argument is due. Rebuttals are available to the public after the 5:00 p.m. deadline.

**Analysis:** County Counsel prepares an impartial analysis of each measure and it is filed on a date set by the Merced County Registrar of Voters Department. If requested by the Board of Supervisors, the County Auditor may also submit an analysis. Analyses are public after the 5:00 p.m. deadline.

**Where to File:** Merced County Registrar of Voters Dept., 2222 M Street, Merced, CA 95340, (209) 385-7541. 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 in Word format to [elections@countyofmerced.com](mailto:elections@countyofmerced.com)

**Filing by Fax or Email:** 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 the electronic transmission or the item(s) will not be considered as filed (weekends and holidays excepted). Electronic transmission must be started prior to 5:00 p.m. on deadline days to be accepted as filed. The Fax number is 209-385-7387. To email, you must scan the document with the signature and email to [elections@countyofmerced.com](mailto:elections@countyofmerced.com)

**Confidentiality:** Arguments, rebuttals and analyses shall remain confidential until 5:00 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 Merced County Registrar of Voters Department. [EC §§9163, 9316 & 9601](#)

**Public Inspection/ Review:** For ten 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. [EC §§9190, 9295, 9380 & 9509](#)

# Campaign Disclosure Statement Requirements

The Political Reform Act requires all proponents of ballot measures and committees supporting or opposing ballot measures, to file campaign disclosure statements disclosing contributions received and expenditures made.

The statutory requirements of the Political Reform Act are now contained in the [Government Code §81000 et seq.](#) Information and assistance relating to campaign reporting obligations under the Political Reform Act may be obtained from the Fair Political Practices Commission.

## Committee Filing Responsibilities

It is the responsibility of the committee to be aware of and to file the required campaign disclosure statements in a correct and timely manner.

## Where to File

The location in which campaign disclosure statements are to be filed depends entirely upon the jurisdiction where the committee is active.

## When to File

Refer to the FPPC Filing Schedule by visiting [www.fppc.ca.gov](http://www.fppc.ca.gov)

## Electronic Filing Requirements for Local Committees

Merced County Registrar of Voters now requires all committees that receive contributions or make expenditures totaling more than \$2,000 in a calendar year, to electronically file campaign disclosure statements. The County now has a web-based data entry filing system that allows committees to electronically create and submit campaign disclosure statements.

For more information visit [www.mercedelections.org](http://www.mercedelections.org)

Fair Political Practices Commission

[www.fppc.ca.gov](http://www.fppc.ca.gov)

1102 Q Street, Ste. 3000

Sacramento, CA 95811

(866) 275-3772

[advice@fppc.ca.gov](mailto:advice@fppc.ca.gov)

# Attachment A – How to Count Words

Pursuant to [EC §9](#)

*Each word is counted as one word except...*

**Punctuation:** Punctuation is not counted.

**Required Titles:** Words used in the title of the document, such as "Argument in Favor of Measure A" are not counted.

**Proper Nouns & Geographical names:** All proper nouns, including geographical names, shall be counted as one word. For example, "Dos Palos-Oro Loma Joint Unified School District" shall be counted as one word.

**Abbreviations:** Each abbreviation for a word, phrase, or expression shall be counted as one word.

**Hyphenations:** Hyphenated words that appear in any generally available dictionary shall be considered as one word. Each part of all other hyphenated words shall be counted as a separate word.

**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. January 1, 2000 shall be counted as two words, whereas 1/1/00 shall be counted as one word.

**Numbers:** Any number consisting of a digit or digits shall be considered as one word. Any number that is spelled, shall be considered as a separate word. "100" shall be counted as one word, whereas "one hundred" shall be counted as two words.

**Phone & Internet:** Web site addresses and telephone numbers shall be counted as 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 (C), percentage sign (%), or number sign (#) as one word.

# Attachment B – Format Guidelines

- Be accurate. **Documents will be printed as submitted.** Spelling, punctuation, and grammatical errors will not be corrected by Merced County Registrar of Voters Department staff.
- An argument, rebuttal, analysis or tax rate statement must be written to address a single measure on the ballot. A document combining arguments pertaining to more than one measure will not be accepted.
- Arguments, rebuttals and analyses must be typed and formatted in block paragraph style.
- All arguments and rebuttals must be accompanied by a Signature Statement. See Attachment D. [EC §9600](#)
- No more than five signatures will appear with any argument. If more than five are submitted, the first five will be printed. [EC §§9164 & 9501](#)
- Be certain to inform the County Elections Official of the order you want signatures to appear.
- 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.
- Arguments, rebuttals, analyses and tax rate statements are printed in the Voter Information Guide in 9 point font.
- Limited use of **bolding**, CAPITALIZING, underlining, *italics*, centering text, and bullets (small solid circle only) are permitted.

# Attachment C—Standardized Headings

Headings will be centered, and printed using all caps in 9-point, bold font.

Ballot Question (Voter Guide)	TITLE OF BALLOT QUESTION (IF PROVIDED) Can be printed in all caps or upper and lower case. Sometimes jurisdictions underline the title. Ballot questions are limited to 75 words. If there is a title, it shall be included in the 75-word limit for ballot questions. Bullets, italics, underlining, and bolding beyond the title, are not permitted in the ballot question. <a href="#">EC §§13247 &amp; 9051</a>													
Measure Text: (Voter Guide)	Full text of Measure Z Text.....													
Initiative: (Voter Guide)	Full text of Initiative Measure Z Text.....													
Analyses:	<p>Impartial analysis of Measure Z</p> <p>If the full text of a county or city measure is not printed in the Voter's Information Pamphlet, pursuant to EC §9160 &amp; §9280, following the text of the impartial analysis insert in 10-pt. bold and centered:</p> <p>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 <a href="http://www.mercedelections.org">www.mercedelections.org</a> or call the Merced County Registrar of Voters at 209-385-7541 [or City Clerk] and a copy will be mailed at no cost to you.</p>													
	Fiscal Impact Statement of Measure Z													
	Tax Rate Statement of Measure Z													
Arguments:	Argument in Favor of Measure Z Argument Against Measure Z													
Rebuttals:	Rebuttal to in Favor of Measure Z Rebuttal to Against Measure Z													
Ballot:	<table border="1" style="width: 100%;"> <tr> <td colspan="2" style="text-align: center;"><b>MEASURES SUBMITTED TO THE VOTERS</b></td> </tr> <tr> <td colspan="2" style="text-align: center;"><b>CITY</b></td> </tr> <tr> <td colspan="2" style="text-align: center;"> </td> </tr> <tr> <td colspan="2" style="text-align: center;">CITY OF MERCED</td> </tr> <tr> <td style="width: 80%;"><b>Z</b> 75-word ballot question without a summary. <a href="#">EC §13247</a></td> <td style="width: 20%; text-align: center;">Yes</td> </tr> <tr> <td></td> <td style="text-align: center;">No</td> </tr> </table>		<b>MEASURES SUBMITTED TO THE VOTERS</b>		<b>CITY</b>				CITY OF MERCED		<b>Z</b> 75-word ballot question without a summary. <a href="#">EC §13247</a>	Yes		No
	<b>MEASURES SUBMITTED TO THE VOTERS</b>													
	<b>CITY</b>													
	CITY OF MERCED													
<b>Z</b> 75-word ballot question without a summary. <a href="#">EC §13247</a>	Yes													
	No													
If the measure is a school bond, the ballot would read: “Bonds Yes” and “Bonds No”														
<a href="#">Education Code §15122</a>														

# Attachment D—Signature Statement

EC §9600

All arguments and rebuttals concerning measures filed pursuant to Division 9 of Elections Code shall be accompanied by the following statement to be signed by each author of the argument. Name and titles listed will be printed in the Voter Information Guide in the order provided below and will appear as indicated below.

The undersigned author(s) of the:

- Argument in Favor
- Argument Against
- Rebuttal to Argument in Favor
- 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 such argument is true and correct to the best of  
(Election Date)

his/her/their knowledge and belief.

Argument/Rebuttal filed by: (check any of the following that apply)  
This information will be provided on the Elections website

**Board of Supervisors or Governing Board**  
Contact Person's Printed Name: \_\_\_\_\_  
Contact Person's Signature: \_\_\_\_\_  
Title: \_\_\_\_\_  
Phone: \_\_\_\_\_ Email: \_\_\_\_\_

**Bona Fide Association of Citizens or Filer of Special District Initiative**  
Name of the Association: \_\_\_\_\_  
Principal Officer's Printed Name: \_\_\_\_\_  
Principal Officer's Signature: \_\_\_\_\_  
Title: \_\_\_\_\_  
Phone: \_\_\_\_\_ Email: \_\_\_\_\_

**Individual Voter Who is Eligible to Vote on the Measure**  
Printed Name: \_\_\_\_\_  
Signature of Voter: \_\_\_\_\_  
Address Where You Live: \_\_\_\_\_  
Phone: \_\_\_\_\_ Email: \_\_\_\_\_

# Signature Statement – Page 2

Check one of the following and write-in the letter assigned to the measure:

- Argument in Favor of Measure \_\_\_\_\_
- Argument Against Measure \_\_\_\_\_
- Rebuttal to Argument in Favor of Measure \_\_\_\_\_
- Rebuttal to Argument Against Measure \_\_\_\_\_

The signatures of the following persons will be printed **as submitted** below following the argument or rebuttal.

Signature	Print Name as it will appear in the Voter Information Guide	Print Title and Name of the Organization (if applicable) as it will appear in the Voter Information Guide	Are you signing on behalf of the Organization? Yes or No *	Date

\*If the argument or rebuttal is being submitted on behalf of an organization, at least one of its principal officers must sign.



# Attachment E—Authorization for Another Person(s) to Sign Rebuttal Argument

I, \_\_\_\_\_ authorize the following person(s) to sign the rebuttal to the argument  
(Print Name of **FILER** of the argument)

for

against

Measure \_\_\_\_\_ for the \_\_\_\_\_ election.  
(Letter) (Election Date)

The filer may authorize any other person or persons to sign the rebuttal argument.

1. \_\_\_\_\_ to sign instead of \_\_\_\_\_  
(Print Name of Rebuttal Signer) (Print Name of Argument Signer)

2. \_\_\_\_\_ to sign instead of \_\_\_\_\_  
(Print Name of Rebuttal Signer) (Print Name of Argument Signer)

3. \_\_\_\_\_ to sign instead of \_\_\_\_\_  
(Print Name of Rebuttal Signer) (Print Name of Argument Signer)

4. \_\_\_\_\_ to sign instead of \_\_\_\_\_  
(Print Name of Rebuttal Signer) (Print Name of Argument Signer)

5. \_\_\_\_\_ to sign instead of \_\_\_\_\_  
(Print Name of Rebuttal Signer) (Print Name of Argument Signer)

Signature of Filer: \_\_\_\_\_

Date: \_\_\_\_\_

**Attach this form to the 2-page Signature Statement submitted with the rebuttal argument**