Volunteer Confusion and the Single-Subject Rule: Government 26 as a Test Case

By Chris Eldon Miller

In 1948, the people of California amended their constitution to ban the “initiative,” under which voters could pass constitutional amendments by ballot. Writing in The Los Angeles Daily Journal, proponents argued that “the free voter does not have the time, thought and knowledge to develop the fundamental principles and modify our society upon such urgently needed political ideas. This change is being pushed upon in general confusion.” A single subject rule required that propositions be limited to one subject. Prop 26 was held to be invalid for this reason.

Accordingly, the people of California revoked the ban on the initiative and adopted Article 2, Section 8, Proposition 26. Section 26 requires that any initiative or referendum must be limited to a single subject. They also added a one-year limit on the number of propositions that could be enacted by initiative or referendum.

In 1990, the people of California adopted initiative No. 10, which banned the death penalty. Section 26 was challenged as unconstitutionally vague. In 1991, the initiative was held to be invalid, on the ground that it was ambiguous and unconstitutionally vague.

In 1994, the people of California adopted Proposition 209, which requires that any initiative or referendum must be limited to one subject. The initiative was held to be invalid for this reason.

In 1998, the people of California adopted initiative No. 11, which would have eliminated the death penalty. Section 26 was held to be invalid, on the ground that it was ambiguous and unconstitutionally vague.

In 2000, the people of California adopted initiative No. 20, which would have prohibited affirmative action programs. Section 26 was held to be invalid, on the ground that it was ambiguous and unconstitutionally vague.

In 2004, the people of California adopted initiative No. 49, which would have eliminated affirmative action programs. Section 26 was held to be invalid, on the ground that it was ambiguous and unconstitutionally vague.

In 2008, the people of California adopted initiative No. 52, which would have prohibited affirmative action programs. Section 26 was held to be invalid, on the ground that it was ambiguous and unconstitutionally vague.

In 2012, the people of California adopted initiative No. 56, which would have eliminated affirmative action programs. Section 26 was held to be invalid, on the ground that it was ambiguous and unconstitutionally vague.

In 2016, the people of California adopted initiative No. 62, which would have prohibited affirmative action programs. Section 26 was held to be invalid, on the ground that it was ambiguous and unconstitutionally vague.

In 2018, the people of California adopted initiative No. 62, which would have prohibited affirmative action programs. Section 26 was held to be invalid, on the ground that it was ambiguous and unconstitutionally vague.

In 2020, the people of California adopted initiative No. 62, which would have prohibited affirmative action programs. Section 26 was held to be invalid, on the ground that it was ambiguous and unconstitutionally vague.

In 2022, the people of California adopted initiative No. 62, which would have prohibited affirmative action programs. Section 26 was held to be invalid, on the ground that it was ambiguous and unconstitutionally vague.

In 2024, the people of California adopted initiative No. 62, which would have prohibited affirmative action programs. Section 26 was held to be invalid, on the ground that it was ambiguous and unconstitutionally vague.

In 2026, the people of California adopted initiative No. 62, which would have prohibited affirmative action programs. Section 26 was held to be invalid, on the ground that it was ambiguous and unconstitutionally vague.

In 2028, the people of California adopted initiative No. 62, which would have prohibited affirmative action programs. Section 26 was held to be invalid, on the ground that it was ambiguous and unconstitutionally vague.

In 2030, the people of California adopted initiative No. 62, which would have prohibited affirmative action programs. Section 26 was held to be invalid, on the ground that it was ambiguous and unconstitutionally vague.

In 2032, the people of California adopted initiative No. 62, which would have prohibited affirmative action programs. Section 26 was held to be invalid, on the ground that it was ambiguous and unconstitutionally vague.

In 2034, the people of California adopted initiative No. 62, which would have prohibited affirmative action programs. Section 26 was held to be invalid, on the ground that it was ambiguous and unconstitutionally vague.

In 2036, the people of California adopted initiative No. 62, which would have prohibited affirmative action programs. Section 26 was held to be invalid, on the ground that it was ambiguous and unconstitutionally vague.

In 2038, the people of California adopted initiative No. 62, which would have prohibited affirmative action programs. Section 26 was held to be invalid, on the ground that it was ambiguous and unconstitutionally vague.

In 2040, the people of California adopted initiative No. 62, which would have prohibited affirmative action programs. Section 26 was held to be invalid, on the ground that it was ambiguous and unconstitutionally vague.

In 2042, the people of California adopted initiative No. 62, which would have prohibited affirmative action programs. Section 26 was held to be invalid, on the ground that it was ambiguous and unconstitutionally vague.

In 2044, the people of California adopted initiative No. 62, which would have prohibited affirmative action programs. Section 26 was held to be invalid, on the ground that it was ambiguous and unconstitutionally vague.

In 2046, the people of California adopted initiative No. 62, which would have prohibited affirmative action programs. Section 26 was held to be invalid, on the ground that it was ambiguous and unconstitutionally vague.

In 2048, the people of California adopted initiative No. 62, which would have prohibited affirmative action programs. Section 26 was held to be invalid, on the ground that it was ambiguous and unconstitutionally vague.

In 2050, the people of California adopted initiative No. 62, which would have prohibited affirmative action programs. Section 26 was held to be invalid, on the ground that it was ambiguous and unconstitutionally vague.