An (in)sufficient petition

At the City Council meeting on August 22, City Administrator Martig read a statement pointing out, among other things, that the petition initiated in late April by a group of Northfielders had been declared deficient by the City Clerk. The reason for this, he said, was that "much of the information required under State Rules" was lacking. He did not name the Rule in question, but it is clear from references in two letters from the City Clerk addressed to the petition's sponsoring committee on May 16 and May 23 that this was Minnesota Rule 8205.1010.

What Mr. Martig failed to explain was the nature of this Rule. Here is the description of its applicability from "Minnesota Administrative Rules," available online:

8205.1010 FORM OF PETITIONS.

Subpart 1.
This part applies to any petition required for any election in this state, including nominating petitions, recall petitions, and proposed recall petitions.

Subpart 2 follows with nine "General form requirements" according to which a petition must be prepared. In the City Clerk's letters referenced above, we were faulted for not having followed most of these requirements. Why did we not follow them? Because the petition we had prepared did not fall under the category of Rule 8205.1010 at all, in that it did not concern an *election* of any sort, but was rather a *reverse referendum* opposing the Council's issuance of street reconstruction bonds.

Why did Mr. Martig not cite Rule 8205.1010 directly in his comments? I'm not able to answer that question, but it must be apparent that if he had, anyone hearing his comments or reading them subsequently would inevitably have come to the realiztion that this Rule and its stipulations had no relevance for our petition.

Or is there a deficiency in my understanding? Please, Mr. Martig, help me to understand how the Rule in question could refer *solely* to petitions involving elections, while at the same time being applicable to a petition of a *completely different nature* such as ours?