State of Michigan
In the Supreme Court

The People of the State of Michigan	COA No. 374487
Plaintiff-Appellee,	Cheboygan County Circuit Court Case No. 24-006781-FH
v.	
Clinton Ormsbee	
Defendant-Appellant.	

Clinton Ormsbee's
Application for Leave to Appeal

Henry E. Schneider P82476
Assistant Defender

Counsel for Clinton Ormsbee

State Appellate Defender Office
3031 West Grand Boulevard, Suite 450
Detroit, Michigan 48202
Phone: (517) 334-6069
hschneider@sado.org

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Statement of the Questions Presented

First Question

I. Is MCL 769.1k(1)(b)(iii) unconstitutional AS APPLIED to Mr. Ormsbee as it fails to distinctly state the tax it imposes, violates Separation of Powers principles, and violates Due Process protections? This Court has NEVER considered these AS-APPLIED challenges.

Mr. Ormsbee answers: Yes.

The trial court answered: The trial court did not answer.

The Court of Appeals answered: No.

Judgment Appealed From and Relief Sought

Clinton Ormsbee seeks leave to appeal or peremptory reversal of the Court of Appeals' order affirming his sentence. *People v Clinton Ormsbee*, unpublished per curiam order of the Court of Appeals, issued April 1, 2025 (Docket No. 374487).

Mr. Ormsbee's direct appeal raised one claim: that MCL 769.1k(1)(b)(iii) is unconstitutional as applied to Mr. Ormsbee.

The Court of Appeals' per curiam order denied Mr. Ormsbee leave to appeal. *People v Clinton Ormsbee*, unpublished per curiam order of the Court of Appeals, issued April 1, 2025 (Docket No. 374487).

MCR 7.305(C)(5)(c) permits an appellant to file an application for leave to appeal to this Court "on all issues raised initially in the Court of Appeals" within 56 days of the Court of Appeals' order or opinion disposing of the case following remand.

Mr. Ormsbee now seeks leave to appeal from the Court of Appeals' April 1, 2025 order denying leave to appeal.

Introduction

Mr. Ormsbee raises as-applied challenges to the constitutionality of MCL 769.1k(1)(b)(iii) under Const 1963, art 1, § 17 – challenges never considered by this Court.

This Court should grant leave to appeal as this application involves a substantial question about the validity of a legislative act, MCR 7.305(B)(1); there is significant public interest in this issue, MCR 7.305(B)(2)l and this issue involves legal principles of major significance to Michigan's jurisprudence, MCR 7.305(B)(3).

Statement of Facts

On July 16, 2024, Clinton Ormsbee pleaded no-contest to Home Invasion – Third Degree in the Cheboygan County Circuit Court. [T 2024-07-16 8.] He was subsequently sentenced to 2 years of probation, with the first year to be served in the Cheboygan County Jail. [T 2024-08-20 13.] As part of Mr. Ormsbee's sentence, he was ordered to pay the following costs and fees:

Crime Victim Assessment: $130.00

Restitution: $40.00

Costs: $350.00

State Minimum Costs: $68.00

Other: $60.00

Supervision Fee: $720.00

Total: $1368.00

[T 2024-08-20 17.]

Mr. Ormsbee filed an Application for Leave to Appeal in the Court of Appeals on February 19, 2025, arguing that MCL 769.1k(1)(b)(iii) is unconstitutional as applied to him. His application was denied on April 1, 2025. Mr. Ormsbee now seeks leave to appeal from the Court of Appeals order.

Arguments

I. MCL 769.1k(1)(b)(*iii*) is unconstitutional AS APPLIED to Mr. Ormsbee as it fails to distinctly state the tax it imposes, violates Separation of Powers principles, and violates Due Process protections. This Court has recently been presented with these AS APPLIED challenges but has failed to address them.

Standard of Review

Appellate courts review de novo both questions of statutory interpretation and questions of constitutional law. *People v Vanderpool*, 505 Mich 391, 397 (2020).

Issue Preservation

Mr. Ormsbee preserved his objections to the trial court's imposition of an unconstitutional sentence by raising it in a proper motion to remand. See MCL 769.34(10); MCR 6.429(C); *People v Kimble*, 470 Mich 305, 311-12 (2004) (raising sentencing error in motion to remand preserves issue for appeal).

Discussion

MCL 769.1k(1)(b)(*iii*) has been beset by legal challenges for years. Over five years ago MCL 769.1k(1)(b)(*iii*) was described as a "long-simmering" problem. *People v Cameron*, 504 Mich 927 (2019) (MCCORMACK, C.J., concurring). Now, the problem is boiling over, and Michigan courts need to take it off the stove.

MCL 769.1k(1)(b)(*iii*) states:

> (b) The court may impose any or all of the following:
>
> . . .

> (*iii*) Until December 31, 2026, any cost reasonably related to the actual costs incurred by the trial court without separately calculating those costs involved in the particular case, including, but not limited to, the following:
>
> (A) Salaries and benefits for relevant court personnel.
>
> (B) Goods and services necessary for the operation of the court.
>
> (C) Necessary expenses for the operation and maintenance of court buildings and facilities.

The Legislature originally enacted this provision in 2005. 2005 PA 316. At that time, MCL 769.1k(1)(b)(*ii*) simply read a court may impose "[a]ny cost in addition to the minimum state cost set forth in subdivision (a)." In *People v Cunningham*, 496 Mich 145 (2014), this Court held that the contemporary version of MCL 769.1k(1)(b)(*ii*) only enabled courts to assess costs otherwise authorized by statute. *Id*. at 159. In response, the Legislature amended the statute, as provided above, requiring such cost to be "related to the actual costs incurred by the trial court." MCL 769.1k(1)(b)(*iii*).

Following *Cunningham*, the Legislature created the Trial Court Funding Commission (TCFC) to address public and widespread problems with trial court funding. *Trial Court Funding Commission Final Report* (2019), p 4. The TCFC identified three "problems" that are "key barriers to an effective trial court funding system":

- A real or perceived conflict of interest between a judge's impartiality and the obligation to use the courts to generate revenue;
- Inadequate funding from all sources due to excessive dependence on local government funding; and

- Unequal access to justice harming those who are most vulnerable and have the least access to financial resources. [*Trial Court Funding Commission Final Report*, pp 4, 8.]

The TCFC concluded that 26.2 percent of trial court funding was being generated by courts themselves. *Id.* at 7. In gross terms, that was about $291 million annually generated from criminal sentencing assessments. *Id.* Moreover, an estimated $127 million annually that was transferred to the trial courts from the state had originally been collected by trial courts. *Id.* When the TCFC further analyzed the various funding sources and destinations, it uncovered a dizzying mishmash of at least six different funds where money filters from one fund to another, to another. See *id.* at 14.

MCL 769.1k(1)(b)(*iii*) was next challenged in *People v Cameron*, 319 Mich App 215 (2017), lv den 504 Mich 927 (2019). Then Chief Justice McCormack observed the coordinate branches "have recognized the long-simmering problems" posed by MCL 769.1k(1)(b)(*iii*). *Cameron*, 504 Mich at 927. She cautioned that denying leave in *Cameron* would "allow our current system of trial court funding in Michigan to limp forward." *Id.*

Mr. Ormsbee's case provides this Court with occasion to address these longstanding constitutional issues. Unlike prior applications involving MCL 769.1k(1)(b)(*iii*), Mr. Ormsbee raises as-applied challenges never considered by the this Court.[1] "An as-applied

[1] Several other cases are pending in Michigan courts arguing that MCL 769.1k(1)(b)(*iii*) is unconstitutional as applied. This Court has denied leave and failed to address these challenges multiple times. See *People v Jones*, 18 NW3d 315 (2025); *People v Kincaid*, 19 NW3d 339; *People v Pritchard*, 19 NW3d 368 (2025); *People v Hudson*, 19 NW3d 346 (2025). In *People v Adkins* the Court of Appeals has been presented with this

challenge, to be distinguished from a facial challenge, alleges 'a present infringement or denial of a specific right or of a particular injury in process of actual execution' of government action." *Bonner v City of Brighton*, 495 Mich 209, 223 (2014). Indeed, as discussed below, the "actual execution" of MCL 769.1k(1)(b)(*iii*) violates the Distinct Statement Clause, Separation of Powers principles, and Due Process protections.

A. MCL 769.1k(1)(b)(iii) violates Const 1963, art 4, § 32 as applied to Mr. Ormsbee because it fails to distinctly state the tax it imposes.

The Distinct Statement Clause requires that "[e]very law which imposes, continues or revives a tax shall distinctly state the tax." Const 1963, art 4, § 32.

As a threshold matter, MCL 769.1k(1)(b)(*iii*) imposes a tax. In *Cameron*, the Court of Appeals explained the difference between a "tax" and a "fee":

> A tax is an exaction or involuntary contribution of money the collection of which is sanctioned by law and enforceable by the courts. Taxes have a primary purpose of raising revenue, while fees are usually in exchange for a service rendered or a benefit conferred. Taxes are designed to raise revenue for the general public, while a fee confers benefits only upon the particular people who pay the fee,

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issue, but so far the court has only granted leave to appeal as to a separate issue, leaving Mr. Adkins' application pending with regard to his argument about court costs. *People v Adkins*, unpublished order of the Court of Appeals issued October 14, 2024 (Docket No. 372177). The statute has been challenged in *People v King* (Court of Appeals Docket No. 370135). The Court of Appeals denied leave in *People v Tower*, unpublished order of the Court of Appeals issued May 19, 2025 (Docket No. 374972).

> not the general public or even a portion of the public who do not pay the fee.
>
> When determining whether a charge constitutes a fee or a tax, a court must consider three questions: "(1) whether the charge serves a regulatory purpose rather than operates as a means of raising revenue, (2) whether the charge is proportionate to the necessary costs of the service to which it is related, and (3) whether the payor has the ability to refuse or limit its use of the service to which the charge is related." . . . [319 Mich App at 222 (internal citation and quotation omitted).]

The *Cameron* court looked to the plain language of the statute and relied on *People v Konopka*, 309 Mich App 345, 368 (2015), for the proposition that raising revenue from criminal defendants was a legitimate state purpose. *Cameron*, 319 Mich App at 223-224. The *Cameron* court noted that the State Court Administrative Office recommended courts divide the aggregate cost of the criminal case load by the number of criminal cases for a per case proportional cost. However, the court concluded that costs imposed are "nevertheless [dis]proportionate to the service provided because any service rendered by the trial court's role in the prosecution of defendant benefits primarily the public, not defendant." *Id.* at 227. Finally, the *Cameron* court observed that criminal defendants have no power to avoid the tax. Therefore, MCL 769.1k(1)(b)(*iii*) imposes a "tax" which must comport with the Distinct Statement Clause—Const 1963, art 4, § 32. *Cameron's* holding on this point remains binding on lower courts.

Westinghausen v People, 44 Mich 265, 266-267 (1880), is an instructive Distinct Statement Clause case. As included in the 1850 Constitution, the Distinct Statement Clause read:

> Every law which imposes, continues or revives a tax shall distinctly state the tax, and the objects to which it is

> to be applied; and it shall not be sufficient to refer to any other law to fix such tax or object. [Const 1850, Art 14, § 14.]

Westinghausen noted the clause's "intent is manifest": "to prevent the legislature from being deceived in regard to any measure for levying taxes, and from furnishing money that might, by some indirection, be used for objects not approved by the legislature." 44 Mich at 267. As such, *Westinghausen* commanded, "We must treat these provisions sensibly, and not hypercritically; and, when the purpose is named and unmistakable, and it is impossible for the legislature to be misled." *Id.*

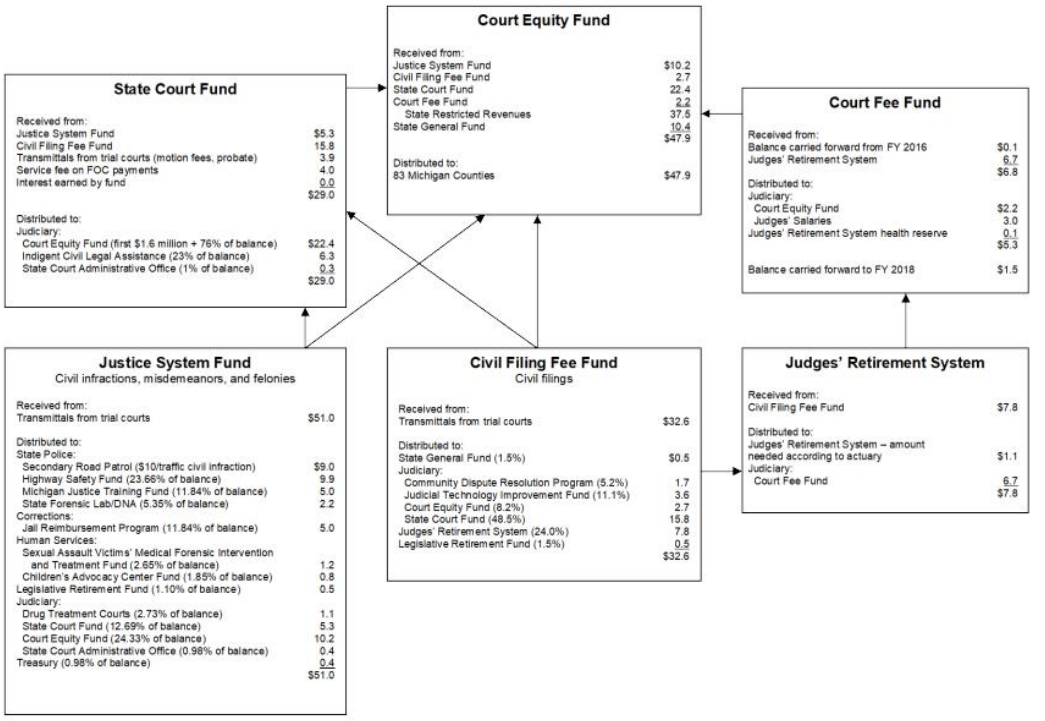
There, the tax in question was a tax imposed on people selling liquor. *Id.* at 266. The tax was to be collected by the county treasurer and placed to the credit of the contingent fund of the township, city, or village from which it was collected, and paid over to a local officer. *Id.* at 267. The defendant, who sold liquor without paying the tax, argued that a contingent fund was not a specific enough recipient of the tax. This Court disagreed, noting that this proved too much insofar as it would invalidate any contingent fund. *Id.* But, even at this outer boundary, the proceeds from the tax went into a discrete fund specified by the statute.

The 1963 Constitution carried over the Distinct Statement Clause but revised it to its present form, deleting the requirement for specifying where taxed funds are allocated to. "In a complex system of taxation, when the proceeds of one general tax may be devoted to many different purposes, this seems obsolete." 1 Official Record, Constitutional Convention 1961, p 36. The Distinct Statement Clause has not often been discussed since then.

As discussed above, MCL 769.1k(1)(b)(*iii*) was challenged under the Distinct Statement Clause in *Cameron*. However, that was a facial challenge. In that context, a challenger of a statute "must establish that no set of circumstances exists under which the [a]ct would be valid." *Judicial Attorneys Ass'n v State*, 459 Mich 291, 303 (1998). But there is a theoretical set of circumstances in which MCL 769.1k(1)(b)(*iii*) would be valid: if the funds taken from criminal defendants for the purposes listed in the statute went to those purposes. Here, however, Mr. Ormsbee challenges MCL 769.1k(1)(b)(*iii*) as it is applied to him in that the funds do not go where MCL 769.1k(1)(b)(*iii*) directs them.

The question for this Court now is whether the real world application of MCL 769.1k(1)(b)(*iii*) has resulted in the Legislature being "deceived in regard to any measure for levying taxes, and from furnishing money that might by some indirection be used for objects not approved by the Legislature." *Cameron*, 319 Mich App at 229 quoting *Gillette Commercial Operations North America & Subsidiaries v Department of Treasury*, 312 Mich App 394 (2015). Yes, it has. MCL 769.1k(1)(b)(*iii*) very specifically lists where court costs assessed against criminal defendants are supposed to go. But they don't go there. They go here:

EXHIBIT 3. 2017 Court Equity Funding Sources (in millions)



Trial Court Funding Commission Final Report 14

Trial Court Funding Commission Final Report, p 14.

For example, consider the "Justice System Fund" that receives "transmittals from trial courts" in cases regarding "[c]ivil infractions, misdemeanors, and felonies." *Id.* That money is then distributed to, among other things, the State Police's Highway Safety Fund, and the Legislative Retirement Fund. *Id.* Furthermore, over ten percent of the Justice System Fund is transferred to the "State Court Fund," which is then distributed to, among other things, an Indigent Civil Legal Assistance program. *Id.* These uses of Mr. Ormsbee's court costs are not "reasonably related to the actual costs incurred by the trial court." MCL 769.1k(1)(b)(*iii*). Nor are they any of the statute's enumerated purposes. E.g. MCL 769.1k(1)(b)(*iii*)(A) ("Salaries and benefits for relevant court personnel.").

Although the statute is clear where funds collected as court costs are supposed to go, they instead filter through a byzantine system which atomizes and scatters every dollar it touches. How could the Legislature, or anyone for that matter, know where collected court costs end up?

Though this Court has not definitively decided whether MCL 769.1k(1)(b)(*iii*) satisfied the requirements of the Distinct Statement Clause in the context of a facial challenge,[2] it is clear MCL 769.1k(1)(b)(*iii*) does not satisfy the requirements of the Distinct Statement Clause as applied to Mr. Ormsbee.

B. MCL 769.1k(1)(b)(*iii*) violates Separation of Powers principles AS APPLIED to Mr. Ormsbee by foisting the Legislature's duty to fund the Judiciary under Const 1963, art 9, § 1 onto the Judiciary and turning trial courts into self-funding tax assessors and collectors.

As recently discussed by this Court:

> The separation of the principal powers of government into three separate branches is a cornerstone of the checks and balances built into the Michigan and United States Constitutions. It is indisputable that the judiciary holds

[2] The viability of the Michigan Court of Appeals' analysis in *Cameron* regarding the Distinct Statement Clause has been called into question by Due Process challenges. See *People v Johnson*, 511 Mich 1047, 1053 (2023) (CAVANAGH, J., concurring) ("In both *Konopka* and *Cameron*, MCL 769.1k(1)(b)(*iii*) was held constitutional only because the Legislature relied on it to fund courts. By denying leave to appeal here, the Court seems to be reading MCL 769.1k(1)(b)(*iii*) inconsistently with how the *Konopka* and *Cameron* panels understood the statute, leaving the continued viability of those cases unclear.").

> and exercises "the judicial power of the state," Const 1963, art 6, § 1, and that the Legislature holds and exercises "the legislative power," Const 1963, art 4, § 1.
>
> Michigan's Constitution also mandates that "[t]he legislature shall impose taxes sufficient with other resources to pay the expenses of state government." Const. 1963, art. 9, § 1. The cost of operating the judiciary is an expense of state government, given that the state's judicial power is "vested exclusively in one court of justice," Const. 1963, art. 6, § 1. . . . [*Johnson*, 511 Mich at 1064 (WELCH J., dissenting).]

Of course, the branches of government are not "entirely separate and distinct," *Mistretta v United States*, 488 US 361 (1989), and this Court has recognized that "the boundaries between these branches need not be airtight." *Makowski v Governor*, 495 Mich 465, 482 (2014). Still, there are boundaries.

For example, it has been settled for almost 100 years that "[t]he whole subject of finance and taxation is placed by the Constitution of this State under the control of the legislature." *C F Smith Co v Fitzgerald*, 270 Mich 659, 670 (1935). Further, the Constitution prohibits the Legislature from delegating the power to tax: "The power of taxation shall never be surrendered, suspended or contracted away." Const 1963, art 9, § 2.

In *Houseman v Kent Circuit Judge*, 58 Mich 364 (1885), a statute allowed judges to appoint surveyors to determine apportionment of costs for drain assessments. This Court struck the statute down, reasoning:

> [t]he duties which it imposes upon the courts are not judicial in their nature, but belong to the administrative branch of the government. The sending out surveyors or other persons to make examination or surveys to relevy taxes in place of invalid ones, are each and all acts which

> do not pertain to the judicial branch of the government. [*Id.* at 367.]

The delegation of the Legislature's taxing power through MCL 769.1k(1)(b)(*iii*) is more blatant than *Houseman* in multiple respects. In *Houseman* the court was appointing an expert to calculate the amount of the tax. With MCL 769.1k(1)(b)(*iii*), the judge does it. In *Houseman* the relevying occurred only when there was a controversy about an initial assessment. With MCL 769.1k(1)(b)(*iii*), judges may impose the tax in every case. In *Houseman* the cost of a drain project would provide a judge clear guidance on how much to assess. With MCL 769.1k(1)(b)(*iii*), the only limit or guidance on how much can be taxed is the expenses of the court.

To prevail, Mr. Ormsbee need not establish that MCL 769.1k(1)(b)(*iii*) could never be implemented accordant with Separation of Powers principles. Rather, Mr. Ormsbee must only show the judiciary exercised the Legislature's taxing power *in his case*. It certainly did when it collected $350 for its own coffers.

C. MCL 769.1k(1)(b)(*iii*) violates Due Process AS APPLIED to Mr. Ormsbee under Const 1963, art 1, § 17 because it creates a potential for bias or objective risk of actual bias.

As Chief Justice Cavanagh explained in her dissent in *Johnson*:

> The rule that "[n]o one ought to be a judge in his own cause" is both "inflexible" and "manifestly just." Cooley, Constitutional Limitations (1st ed.), p. 410. When a judge has an interest in a case, he is "equally excluded as if he were the party named." *Id.* at 411. There is some threshold quantity of interest necessary to invoke the rule. Clearly, a judge is not excluded by an interest which is "so remote,

> trifling, and insignificant, that it may fairly be supposed to be incapable of affecting the judgment or of influencing the conduct of an individual." *Id*. at 412. But exclusion may be required even if there is no assertion that any particular judge is actually biased; a systematic interest in a decision that objectively creates a possible temptation for a judge to be biased is sufficient.
>
> The United States Supreme Court has provided a standard against which to weigh judicial interests: "Every procedure which would offer a possible temptation to the average man as a judge to forget the burden of proof required to convict the defendant, or which might lead him not to hold the balance nice, clear and true between the State and the accused, denies the latter due process of law." *Tumey v Ohio*, 273 US 510, 532 (1927). . . . . [*Johnson*, 511 Mich at 1049 (CAVANAGH, J., dissenting).]

So the question is whether there is a "possible temptation" to fail to "hold the balance nice, clear and true between the State and the accused." This is not a subjective inquiry about any one judge, but an objective inquiry asking, "under a realistic appraisal of psychological tendencies and human weakness," "whether there is an unconstitutional potential for bias." *Caperton v A T Massey Coal Co, Inc*, 556 US 868 at 881, 883 (2009) (quotation marks and citations omitted).

In *Ward v Village of Monroeville, Ohio*, 409 US 57 (1972), an Ohio statute authorized mayors to sit as judges in cases of ordinance violations and certain traffic offenses. The Mayor was also responsible for many executive aspects including accounting on the village's finances. The village's dependence on revenue the Mayor generated combined with the Mayor's responsibility for village finances created a set of incentives which was dispositive:

> Conceding that "the revenue produced from a mayor's court provides a substantial portion of a municipality's funds," the Supreme Court of Ohio held nonetheless that

> "such fact does not mean that a mayor's impartiality is so diminished thereby that he cannot act in a disinterested fashion in a judicial capacity." [*Village of Monroeville v Ward*, 27 Ohio St 2d 179, 185 (1971).] We disagree with that conclusion. [*Ward*, 409 US at 59.]

While this Court discussed a facial challenge in *Johnson*, and the question was whether MCL 769.1k(1)(b)(*iii*) could function constitutionally under any circumstances, Mr. Ormsbee challenges the statute as applied to him.[3] In this context, the real world evidence is dispositive. The Legislature created the TCFC which named as the first problem which needs to be addressed "A real or perceived conflict of interest between a judge's impartiality and the obligation to use the courts to generate revenue." *Trial Court Funding Commission Final Report*, pp 4, 8. The Michigan District Judges Association (MDJA) has gone on record about the pressure they actually face:

> [T]he MDJA has again argued in its amicus brief that the statute is unconstitutional, saying unequivocally, "MCL 769.1k(1)(b)(iii) gives Michigan's judges a pecuniary interest in the outcome of their criminal cases." The MDJA said that "district court judges have been pressured to raise revenues not only for their courts, but for the whole county in some instances." [*Johnson*, 511 Mich at 1045 (CAVANAGH, J., dissenting).]

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[3] In *Johnson*, Justice Bolden concurred in the Court's order denying leave to appeal, emphasizing the facial nature of the challenge, unconvinced that "any party has shown there are no circumstances in which the statute, essentially, asserts such pressures that judges imposing court costs cannot set aside these pressures to accomplish the goals of fair and impartial oversight of proceedings." 511 Mich at 1048 (BOLDEN, J., concurring). But "[o]f course," Justice Bolden noted, "this does not mean that the judiciary can never consider due-process or other as-applied challenges when funding pressures demonstrably impeded the goals of the judiciary." *Id.* Now an as-applied challenge is before this Court.

When determining "whether there is an unconstitutional potential for bias" this Court need only look to the conclusion of the TCFC that there is a "real or perceived conflict of interest between a judge's impartiality and the obligation to use the courts to generate revenue," *Trial Court Funding Commission Final Report*, pp 4, 8, and the statements of the MDJA that "MCL 769.1k(1)(b)(*iii*) gives Michigan's judges a pecuniary interest in the outcome of their criminal cases." *Johnson*, 511 Mich at 1045 (CAVANAGH, J., dissenting). This is the problematic backdrop against which the judge in Mr. Ormsbee's case imposed court costs. More than just problematic, it is a violation of Mr. Ormsbee's due process rights.

Conclusion and Relief Requested

For the reasons discussed above, Mr. Ormsbee respectfully requests that this Honorable Court grant leave to appeal or any other peremptory relief it deems just and appropriate.

Respectfully submitted,

State Appellate Defender Office

/s/ Henry Schneider

Henry Schneider P82476
Assistant Defender

Chloe Brueck P87952
Daniella Cohen P88350
Assistant Defenders

Brett DeGroff P74898
Managing Attorney

Counsel for Clinton Ormsbee

With Substantial Assistance from

Monique Dake
Mitigation Specialist

Tonia Frazier-Akins
Paralegal

State Appellate Defender Office
3031 West Grand Boulevard, Suite 450
Detroit, Michigan 48202
Phone: (517) 334-6069
hschneider@sado.org

This Application contains 3914 countable words.

Date: May 21, 2025

Certificate of Compliance

I hereby certify that this document contains 3914 countable words. The document is set in Century Schoolbook, and the text is in 12-point type with 18-point line spacing and 12 points of spacing between paragraphs.

Respectfully submitted,

State Appellate Defender Office

/s/ Henry Schneider

Henry Schneider P82476
Assistant Defender

Counsel for Clinton Ormsbee

With Substantial Assistance from

Monique Dake
Mitigation Specialist

Tonia Frazier-Akins
Paralegal

State Appellate Defender Office
3031 West Grand Boulevard, Suite 450
Detroit, Michigan 48202
Phone: (517) 334-6069
bdegroff @sado.org

Date: May 21, 2025