

STATE OF MICHIGAN
IN THE SUPREME COURT

REPRODUCTIVE FREEDOM FOR ALL, Supreme Court No. 164760
PETER BEVIER, and JIM LEDERER,

Plaintiffs,

v

BOARD OF STATE CANVASSERS,
JOCELYN BENSON, in her official
capacity, and JONATHAN BRATER, in his
official capacity,

Defendants.

AMICUS BRIEF OF ATTORNEY GENERAL DANA NESSEL

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STATEMENT OF INTEREST

The Attorney General is a constitutionally established officer with an independent obligation to protect the Michigan Constitution and protect the interests of the People of the State of Michigan. See MCL 14.28; MCL 14.101. The Michigan Court Rules permit the Attorney General file an amicus curiae brief without a motion for leave to do so. MCR 7.312(H)(2).

STATEMENT OF QUESTION PRESENTED

1. The Constitution reserves for the People the power to amend it, subject to the Legislature’s direction about “the form” of petitions proposing an amendment. Despite several detailed provisions governing the form of all such petitions, there are none that concern word spacing. Did the Board of State Canvassers (Board) violate its ministerial duty to certify a sufficient and valid petition when it effectively created and applied an extralegal requirement about word spacing, contrary to its limited statutory charge?

Plaintiffs’ answer: Yes.

Proposed Intervenor-Defendant’s answer: No.

Board’s answer: No.

Amicus Attorney General’s answer: Yes.

INTRODUCTION

The Board's refusal to certify the petition sponsored by Reproductive Freedom For All (RFFA) is an affront to direct democracy in this State. In the first breath of our Constitution, the People announced, "All political power is inherent in the people." Const 1963, art 1, § 1. They held true to this general authority by retaining for themselves the specific power to amend their Constitution. Const 1963, art 12, § 2. This Court has consistently protected this right against nullification, subject to the Legislature's authority to dictate "the form" of the petitions necessary to put a question on the ballot. *Id.*

The Legislature did specify the form, and did so in painstaking minutiae. It detailed the required page size of the petition (down to the half-inch), mandated several font sizes applicable to different aspects of the petition, and dictated certain language that must be on the face of the petition. MCL 168.482. But the Legislature made no mention of spacing within the text appearing on the petitions, the basis of the challenge to the RFFA petition. Absent a constitutional or statutory deficiency, the Constitution requires that the valid proposal appear on the ballot.

Yet the Board of State Canvassers—a ministerial body without any legal powers or judgment of its own—effectively usurped the Legislature's authority by refusing to approve the petition, ostensibly because two of the Board's members thought the word spacing was insufficient. They effectively created and applied legislation. By aggrandizing itself, the unelected Board has treated the Constitution of this State as an advisory document, and stripped the People of their right to amend their Constitution. This Court should issue a writ of mandamus.

STATEMENT OF FACTS AND PROCEEDINGS

On March 7, 2022, Reproductive Freedom for All (RFFA), submitted the challenged petition to the Bureau of Elections for pre-approval of the form. (3/7/22 Petition.) The Board approved the petition, subject to some required changes not at issue here. (3/23/22 Board of Canvassers Mt'g.)

The proposal was submitted and supported by roughly 750,000 signatures. (8/26/2022 Staff Report at 1–2.) After sampling the signatures to determine whether a sufficient number of valid signatures was submitted, Staff “estimated that the petition contains 596,379 valid signatures (at a confidence level of 100%),¹ 146,228 signatures more than the minimum threshold for certification.” (8/26/2022 Staff Report at 5.) No challenge is made to the overwhelming number of signatures.

But a challenge filed by Citizens to Support MI Women and Children (WAC) aimed at the substance of the petition, “a determination that is beyond the purview of the Board.” (8/26/2022 Staff Report at 3.) More specifically, WAC claimed that “The Board must reject the Petition because it seeks to insert nonexistent words into the Michigan Constitution.” (8/18/22 WAC Challenge to the Form of Petition at 2.) The crux of WAC’s argument is that there is insufficient spacing between several words in the “text of the amendment so proposed,” see MCL 168.482(3), supposedly rendering it “gibberish.” (8/18/22 WAC Challenge to the Form of Petition at 3.)

¹ “[T]here is a 100% statistical probability that certification is the correct result.” (8/26/2022 Staff Report at 5.)

In response, RFFA asserted that this objection was a matter of substance, not form, and submitted an affidavit of the printer asserting that spacing between certain words on the petition was minimized, but not eliminated. (8/23/22 RFFA Response; RFFA’s App’x at 197–199, 220–222.) And the spacing between the words was typical in both the filings given to the Secretary of State. (*Id.*, App’x I at 213–216.)

The Staff evaluation noted that “[t]he Michigan Election Law is silent on the amount of space that must be between letters and words in a petition.” (8/26/2022 Staff Report at 4.) Staff recommended the Board approve certification of the petition. (*Id.* at 5.)

On August 31, 2022, the Board deadlocked despite this recommendation. Two Board members, Anthony Daunt and Richard Houskamp, voted to disqualify the petition. Houskamp’s decision was based on, apparently, alleged “typos” in the petition. (See RFFA Br in Support, p 8 n 9.) Daunt stated the lack of full spacing for part of the reproduction of the proposed constitutional text “is a form issue because it is how it looks, it is what is before the people, it is what is their understanding of it.” (See RFFA Br in Support, p 8 n 10.)

On September 1, 2022, RFFA filed a complaint invoking this Court’s original jurisdiction and seeking, among other things, a writ of mandamus directing the Board of Canvassers, the Secretary of State, and the Director of Elections “to take all actions necessary to certify the petition to appear on the November 8, 2022 general election ballot.” (Complaint at 22, Request for Relief, B.)

GOVERNING STANDARD

“To obtain a writ of mandamus the plaintiff must show that it has a clear legal right to the performance of the specific duty sought to be compelled and that the defendant has a clear legal duty to perform the act.” *Stand Up for Democracy v Secretary of State*, 492 Mich 588, 618 (2012) (opinion by M.B. KELLY, J.).

ARGUMENT

I. **The Board of State Canvassers expanded its charge, took the role of the Legislature, and would deprive the People the reserved right to amend their Constitution.**

The Board has failed to do its job, and this Court should compel the Board to do it. By refusing to certify the petition, the Board effectively created and applied a new requirement—governing the spacing between words of text—that the Legislature and the Constitution are silent about. The Board’s refusal to certify the petition is not only a flagrant violation of the law of this State, but it also constitutes a veto of the People’s reserved right to amend their Constitution. This Court should grant the writ of mandamus.

A. **The People have retained the right to engage in direct democracy to amend their Constitution.**

In its very first provision, our Constitution is clear that “[a]ll political power is inherent in the people.” *Citizens Protecting Michigan’s Constitution v Secretary of State*, 503 Mich 42, 59 (2018). And the People have retained for themselves several means of direct democracy. “Direct democracy in Michigan is a series of powers that the people have reserved to themselves *from* the Legislature.” *League of*

Women Voters of Michigan v Secretary of State, 508 Mich 520, 536 (2022) (emphasis in original). In fact, “Michigan is one of the leading states when it comes to direct democracy reforms.” *Citizens Protecting Michigan’s Constitution*, 503 Mich at 59 n 18. Consistent with the importance of direct democracy in our State, constitutional provisions regarding direct democracy provisions “ought to be liberally construed,” *Kuhn v Dep’t of Treasury*, 384 Mich 378, 385 (1971); “[t]his Court has consistently protected the right of the people to amend their Constitution.” *Protect Our Jobs v Bd of State Canvassers*, 492 Mich 763, 772 (2012).

The People explicitly retained for themselves the power to amend the Constitution. Const 1963, art 12, § 2. The People also left room for the Legislature (and the Legislature alone) to regulate “the form” of petitions circulated in support of a ballot proposal, “as prescribed by law.” *Id.*

Article 12, § 2 is self-executing, “meaning the Legislature is constrained from encroaching upon it.” *League of Women Voters*, 508 Mich at 549. “While the right to propose amendments by initiative must be done according to constitutional requirements, we have observed that ‘it may be said, generally, that the right can be interfered with neither by the legislature, the courts, nor the officers charged with any duty in the premises.’” *Citizens Protecting Michigan’s Constitution*, 503 Mich at 63, quoting *Scott v Vaughan*, 202 Mich 629, 643 (1918). If the Legislature is barred from encroaching on this authority of the People, surely the ministerial Board of State Canvassers is no more empowered to do so. And yet.

B. The Board acted as a super-Legislature, going well beyond its limited role.

The Board usurped the authority of the Legislature by creating and imposing a new requirement about spacing, refusing to certify the petition for the ballot on a matter that the Legislature is silent on. As this Court has recognized, “[d]etails as to form of petitions, their circulation and other elections procedures *are left to the determination of the legislature.*” *League of Women Voters*, 508 Mich at 547, quoting 2 Official Record, Constitutional Convention 1961, p 3407 (emphasis added). Two members of the Board have effectively reserved to themselves no less than the authority of the Legislature, and in doing so have shuttered Michigan’s direct democracy process.

It is clear that the Board “has no inherent power.” *Citizens for Protection of Marriage v Bd of State Canvassers*, 263 Mich App 487, 492 (2004). Its role and authority are created by the Legislature and the Constitution. *Id.* And both “[t]he Board’s authority and duties with regard to proposed constitutional amendments are limited to determining whether the form of the petition substantially complies^[2]

² This Court has never held that strict compliance is a constitutional or statutory necessity as it pertains to MCL 168.482 and constitutional amendments under Article 12, section 2. Cf *Stand Up*, 492 Mich at 594 (opinion by M.B. KELLY, J.) (“[A] majority of this Court holds that the doctrine of substantial compliance is inapplicable to *referendum petitions* submitted for certification.”) (emphasis added). Moreover, that portion of *Stand Up* appears to be dicta since a majority of the Court concluded that the “that plaintiff either actually complied with the law or that the Court of Appeals’ original writ of mandamus was not erroneous.” *Id.* at 620. Thus, the Court’s holding concerning whether substantial compliance was sufficient in the context of referendum petitions was “unnecessary to determine the case at hand and, thus, lack[s] the force of an adjudication.” *Estate of Pearce by Pearce v Eaton Cnty Rd Comm*, 507 Mich 183, 197 (2021) (cleaned up). Whether substantial

with the statutory requirements and whether there are sufficient signatures to warrant certification of the proposal.” *Id.*; see also Const 1963, art 12, § 2 (“The person authorized by law to receive such petition shall upon its receipt determine, *as provided by law*, the validity and sufficiency of the signatures on the petition”) (emphasis added). In short, the Board is a limited, ministerial body. See *McLeod v State Bd of Canvassers*, 304 Mich 120 (1942) (describing canvassing boards as “purely ministerial and clerical”).

In other words, the Board is not a roving commission to police what belongs on the ballot. It has a severely circumscribed series of duties here. “[T]he board of state canvassers shall make an official declaration of the sufficiency or insufficiency of a petition under this chapter at least 2 months before the election at which the proposal is to be submitted.” MCL 168.477(1). That’s it, and that’s all.

C. By effectively amending the Election Law to include a requirement regarding spacing, the Board usurped both the Legislature’s authority and the People’s power of direct democracy.

But in refusing to certify the proposal, the Board has in effect created an additional hurdle for ballot proposals to meet, taking upon itself the role of the Legislature. The Constitution has nothing to say about word spacing, only that the “petition shall *include the full text* of the proposed amendment.” Const 1963, art 12, § 2 (emphasis added). The Constitution delegates some authority for the

compliance is appropriate for petitions under Article 12, Section 2 remains an open question. If substantial compliance is sufficient, the petition passes muster even more plainly than it does under strict compliance.

Legislature to set forth rules governing the form of petitions: “such petition shall be in the form, and shall be signed and circulated in such manner, *as prescribed by law.*” Const 1963, art 12, § 2 (emphasis added); *Consumers Power Co v Attorney Gen*, 426 Mich 1, 5 (1986) (recognizing “the clear presence” of “a call for legislative action”). The Legislature is permitted to set rules as to “the form” of a petition.

And it has. The Legislature created requirements to include certain information about the ballot proposal, including its language and which provisions of the Constitution it would affect. MCL 168.482(3). It created a particular warning to be included on the petition that the provision of inaccurate information violates the election code. MCL 168.482(5). The Legislature even included requirements about the tedious minutiae of specific *petition size* (down to the half inch), *font size* (differing for different required text), *font style* (bolded font for some type), and *capitalization* (for some type). MCL 168.482(1), (2), (3), (5), (7), and (8). And *not a single breath about spacing.*

Under the tried-and-true statutory canon of construction *expressio unius*, the inclusion of these requirements makes clear that there are no others. *Bronner v City of Detroit*, 507 Mich 158, 173 (2021), quoting *Detroit v Redford Twp*, 253 Mich 453, 456 (1931) (“*Expressio unius est exclusio alterius* means express mention in a statute of one thing implies the exclusion of other similar things.”) (cleaned up). Absent any statutory requirement regarding word spacing, and in conjunction with the Board’s circumscribed role, the Constitution does not contemplate the Board’s refusal to certify here. See Const 1963, art 12, § 2.

The Board's own staff recognized that "the Michigan Election Law is silent on the amount of space that must be between letters and words in a petition." (8/26/2022 Staff Report, p 4.) In the absence of a statutory requirement, further questions arise: how much space is sufficient for the Board? Do ballot committees need to invest in rulers to ensure that the Board's preferred spacing exists between every word? Or is the test whether a reasonable person could comprehend the text? That these questions are silly only proves the point—the Board has no authority, let alone the expertise, to step in the Legislature's shoes and dictate what constitutes the proper "form." Rather, the Board is required to review the petition against the statutory requirements, and check the appropriate boxes. It has failed in this simple duty.

Worse, the new hurdle the Board has constructed was created without any notice to RFFA or to the signers of the petition. Circulators of initiative petitions deserve to know what requirements they will be held to in exercising their constitutional rights to direct democracy, and they deserve to be held to those standards and *only* those standards. This Court should not let stand the Board's arbitrary and unforeseeable decision—after the RFFA petition was signed, circulated, and submitted—to invent and enforce a new unwritten rule and disenfranchise more than half a million Michiganders. If this Court allows this decision to stand, what limits are there to the new substantive rules the Board could create to prevent people from voting on matters two members disagree with? Denial of mandamus would transform the Board from its proper constitutional role

as a body with *no* discretionary authority to one with *boundless* discretionary authority to block the People’s voice.

“[T]he primary purpose of a writ of mandamus is to enforce duties required by law.” *Stand Up*, 492 Mich at 618. The Board is required by law to certify the petition as it complies with the Michigan Election Law.

D. Any question about the meaning of the proposal is reserved for challenge should the People vote to adopt the proposed amendment.

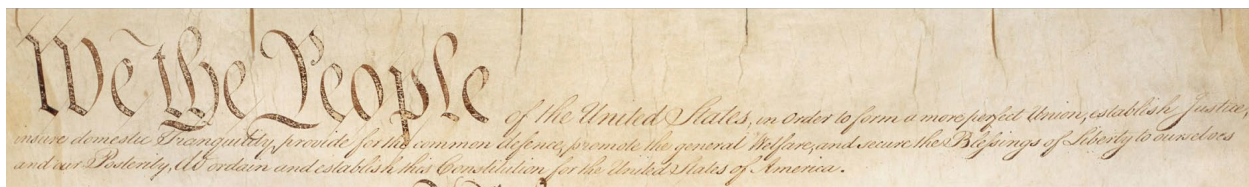
The only provision arguably relevant to the challenge here is one element of MCL 168.482(3), which states, “[t]he full text of the amendment so proposed must follow the summary and be printed in 8-point type.” WAC maintains that a short block of the text of the proposed amendment somehow runs afoul of this requirement, even though the “full text of the amendment” appears just after the summary, and is “printed in 8-point type.”

WAC contends that some of the text of the amendment as included on the petition form is “gibberish” and “nonsensical groupings of letters” that are “not words” and therefore is not properly the subject of a petition to amend the Constitution. (8/18/22 WAC Challenge to the Form of Petition at 3.) But this argument advanced in front of the Board, and apparently adopted by two Board members, is an argument only a lawyer could love.

First, and most importantly, the Board had no authority to refuse certification of the petition on this ground—as discussed, the Legislature has not seen fit to dictate the amount of space between words on a petition, despite the

numerous other size and typographical requirements in the Election Law. The meaning of the words in the petition is a matter of “the substance of the petition,” (Staff Report, p 5), which could be subject to legal challenges should the electorate approve it. See *Citizens for Prot of Marriage*, 263 Mich App at 494 (“[A]ny attempt to determine how courts might eventually apply the proposed amendment, assuming it won voter approval, would be entirely speculative.”). Any questions about the meaning or applicability of the proposed amendment must wait until the proposal is actually adopted. See *id.*

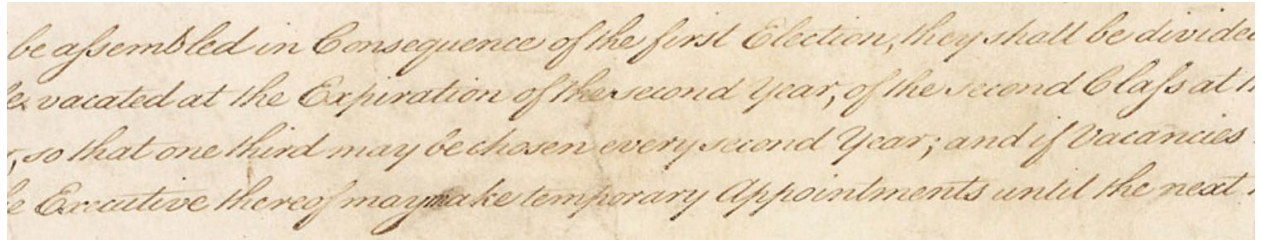
Second, WAC’s argument—that smaller spacing renders the text incomprehensible and thus unworthy of the Constitution—proves too much. Some portions of our Nation’s founding documents look a lot like the challenged petition text, lacking full spacing. The first line of the United States Constitution is just one example:



See The National Archives, US Constitution, Preamble (“We the People of the United States, in order to form more perfect Union, establish Justice, insure domestic Tranquility provide for the common defence, promote the general Welfare, and secure the Blessings of Liberty . . .”).³

³ Available at <https://www.archives.gov/files/historical-docs/doc-content/images/constitution.pdf> (last accessed September 1, 2022).

See also, for example, Article I, § 3, which lacks spacing between several words:



Would WAC suggest that we are unable to understand the United States Constitution because some spaces of the handwritten document were narrower than ordinary? Of course not.

Judges, like the People, are not automatons unable to interpret text. There are tools of statutory construction to decipher the meaning of the Constitution, no matter its text. Even if this proposal was placed on the ballot and received a majority vote with no spacing (which is not the case, as explained by RFFA, Br in Support at 15), the courts have tools to understand and interpret the constitutional text. People are easily capable of reading text with *no* spacing, let alone the text of the petition with its narrow spacing. Classical Greek and Latin, among other languages, were written without spaces, and some modern languages are as well. Would WAC dismiss great works such as the Odyssey or the Epic of Gilgamesh as mere “incoherencies”? (8/18/22 WAC Challenge, p 8.) The point here is not that our Constitution, in modern English, ought to be written without spaces. Again, the petition at issue here *has spaces*, just very narrow ones. The point is that language written without spaces is not inherently incoherent—indeed it is perfectly comprehensible to literate people.

What’s more, this Court has long ensured that clerical errors or scrivener’s errors will not operate to hijack the will of the People. “[A] mere clerical or typographical error [in a statute] . . . should of right be corrected by interpretation.” *Common Council of City of Jackson v Harrington*, 160 Mich 550, 554 (1910). This is particularly true when there is “no doubt” regarding the underlying intent. *Id.* In a 1907 case, this Court was charged with interpreting the language of an appropriation act. *Bd of Control of Mich State Prison at Jackson v Auditor Gen*, 149 Mich 386, 388 (1907). The original bill as passed by the Legislature contained an appropriation for \$175,000 for Jackson State Prison. *Id.* at 387. But the enrolled bill actually signed by the Governor only allocated only \$175. *Id.* at 387–388. The Court determined that the legislation was “valid.” *Id.* at 388. Given the context of the act, this Court determined, “a subsequent clerical mistake in the title as approved by the Governor does not necessarily invalidate the act, if it be such as to show by comparison that no one could be misled by it.”⁴ *Id.* at 388. See also *In re Certified Question from US Dist Court, E Dist of Michigan; S Div*, 420 Mich 51, 63 (1984) (“[i]n view of the expressed legislative public policy” and the strictures of federal constitutional law, changing the statutory phrase criminalizing “open *or* indecent” exposure to “open *and* indecent” exposure) (emphasis added).

⁴ It is fair to say that individuals are generally not inclined to sign petitions which they find incomprehensible. Yet hundreds of thousands of Michiganders have signed the petitions, supporting its placement on the ballot for the whole State to vote on.

All of this is irrelevant for the present moment. Any question of interpretation would only be cognizable should the proposal be ratified. WAC and the two board members jumped the gun, attempting to shoehorn a substantive challenge into one cognizable under the Michigan Election Law. See *Ferency v Bd of State Canvassers*, 198 Mich App 271, 274 (1993) (the courts and the Board will not entertain “a substantive constitutional challenge to a law that had yet to be enacted”). That was an error and this Court should issue a writ of mandamus to ensure the proposal appears on the ballot as required by Michigan law.

* * *

The People’s right to amend their Constitution cannot be discarded by a pair of unelected officials playing fast and loose with their statutory charge. The Constitution is interpreted consistent with the “common understanding” of that document—that which “reasonable minds, the great mass of the people themselves, would give it.” *Traverse City School Dist v Attorney General*, 384 Mich 390, 405 (1971), quoting Cooley’s Constitutional Limitations 81. Article 1, § 1, and Article 12, § 2 guarantee that the People’s right to amend their Constitution will not be compromised by these rogue acts. This Court should grant the writ of mandamus.

CONCLUSION AND RELIEF REQUESTED

The Attorney General respectfully requests this Court issue a writ of mandamus requiring Defendants to certify the petition to appear on the November 8, 2022 election ballot.

Respectfully submitted,

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WORD COUNT STATEMENT

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