

STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT COURT OF CLAIMS COUNTY	SUMMONS	CASE NUMBER
--	----------------	--------------------

Court address Hall of Justice, 925 W. Ottawa Street, Lansing, MI 48909 **Court telephone number** 517-373-0807

Plaintiff's name, address, and telephone number Michigan House of Representatives 100 N. Capitol Avenue Lansing, Michigan 48909	v	Defendant's name, address, and telephone number Department of Technology, Management and Budget and Director Michelle Lange Lewis Cass Building, 2nd Floor 320 S. Walnut Street Lansing, MI 48909 517-241-5545
Plaintiff's attorney bar number, address, and telephone number Sean TH Dutton (P77515) KIENBAUM HARDY VIVIANO PELTON & FORREST, P.L.C. 280 N. Old Woodward Avenue, Suite 400 Birmingham, Michigan 48009		

Instructions: Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (MC 21). The summons section will be completed by the court clerk.

Domestic Relations Case

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

Civil Case

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in ☐ this court, ☐ _____ Court, where

it was given case number _____ and assigned to Judge _____

The action ☐ remains ☐ is no longer pending.

Summons section completed by court clerk.

SUMMONS



NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party **or take other lawful action with the court** (28 days if you were served by mail or you were served outside of Michigan).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date	Expiration date*	Court clerk <i>Jerome W. Zimmer Jr.</i>
------------	------------------	---

*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

PROOF OF SERVICE

TO PROCESS SERVER: You must serve the summons and complaint and file proof of service with the court clerk before the expiration date on the summons. If you are unable to complete service, you must return this original and all copies to the court clerk.

CERTIFICATE OF SERVICE / NONSERVICE

☐ I served ☐ personally ☐ by registered or certified mail, return receipt requested, and delivery restricted to the addressee (copy of return receipt attached) a copy of the summons and the complaint, together with the attachments listed below, on:

☐ I have attempted to serve a copy of the summons and complaint, together with the attachments listed below, and have been unable to complete service on:

Name	Date and time of service
Place or address of service	
Attachments (if any)	

☐ I am a sheriff, deputy sheriff, bailiff, appointed court officer or attorney for a party.

☐ I am a legally competent adult who is not a party or an officer of a corporate party. I declare under the penalties of perjury that this certificate of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee \$	Miles traveled	Fee \$	
Incorrect address fee \$	Miles traveled	Fee \$	TOTAL FEE \$

Signature _____

Name (type or print) _____

ACKNOWLEDGMENT OF SERVICE

I acknowledge that I have received service of a copy of the summons and complaint, together with

Attachments (if any) _____ on _____ Date and time _____

Signature _____ on behalf of _____

Name (type or print) _____

STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT COURT OF CLAIMS COUNTY	SUMMONS	CASE NUMBER
--	----------------	--------------------

Court address Hall of Justice, 925 W. Ottawa Street, Lansing, MI 48909 **Court telephone number** 517-373-0807

Plaintiff's name, address, and telephone number Michigan House of Representatives 100 N. Capitol Avenue Lansing, Michigan 48909	v	Defendant's name, address, and telephone number State Budget Office and Director Jen Flood 111 S. Capitol Avenue #6 Lansing, MI 48933 517-373-8883
Plaintiff's attorney bar number, address, and telephone number Sean TH Dutton (P77515) KIENBAUM HARDY VIVIANO PELTON & FORREST, P.L.C. 280 N. Old Woodward Avenue, Suite 400 Birmingham, Michigan 48009		

Instructions: Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (MC 21). The summons section will be completed by the court clerk.

Domestic Relations Case

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

Civil Case

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in ☐ this court, ☐ _____ Court, where

it was given case number _____ and assigned to Judge _____

The action ☐ remains ☐ is no longer pending.

Summons section completed by court clerk.

SUMMONS



NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party **or take other lawful action with the court** (28 days if you were served by mail or you were served outside of Michigan).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date	Expiration date*	Court clerk <i>Jerome W. Zimmer Jr.</i>
------------	------------------	---

*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

PROOF OF SERVICE

TO PROCESS SERVER: You must serve the summons and complaint and file proof of service with the court clerk before the expiration date on the summons. If you are unable to complete service, you must return this original and all copies to the court clerk.

CERTIFICATE OF SERVICE / NONSERVICE

☐ I served ☐ personally ☐ by registered or certified mail, return receipt requested, and delivery restricted to the addressee (copy of return receipt attached) a copy of the summons and the complaint, together with the attachments listed below, on:

☐ I have attempted to serve a copy of the summons and complaint, together with the attachments listed below, and have been unable to complete service on:

Name	Date and time of service
Place or address of service	
Attachments (if any)	

☐ I am a sheriff, deputy sheriff, bailiff, appointed court officer or attorney for a party.

☐ I am a legally competent adult who is not a party or an officer of a corporate party. I declare under the penalties of perjury that this certificate of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee \$	Miles traveled	Fee \$	
Incorrect address fee \$	Miles traveled	Fee \$	TOTAL FEE \$

Signature _____

Name (type or print) _____

ACKNOWLEDGMENT OF SERVICE

I acknowledge that I have received service of a copy of the summons and complaint, together with

Attachments (if any) _____ on _____ Date and time _____

Signature _____ on behalf of _____

Name (type or print) _____

STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT COURT OF CLAIMS COUNTY	SUMMONS	CASE NUMBER
--	----------------	--------------------

Court address Hall of Justice, 925 W. Ottawa Street, Lansing, MI 48909 **Court telephone number** 517-373-0807

Plaintiff's name, address, and telephone number Michigan House of Representatives 100 N. Capitol Avenue Lansing, Michigan 48909	v	Defendant's name, address, and telephone number Department of Labor and Economic Opportunity and Director Susan Corbin 105 W. Allegan Street Lansing, MI 48933 517-284-7800
Plaintiff's attorney bar number, address, and telephone number Sean TH Dutton (P77515) KIENBAUM HARDY VIVIANO PELTON & FORREST, P.L.C. 280 N. Old Woodward Avenue, Suite 400 Birmingham, Michigan 48009		

Instructions: Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (MC 21). The summons section will be completed by the court clerk.

Domestic Relations Case

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

Civil Case

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in ☐ this court, ☐ _____ Court, where

it was given case number _____ and assigned to Judge _____

The action ☐ remains ☐ is no longer pending.

Summons section completed by court clerk.

SUMMONS



NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party **or take other lawful action with the court** (28 days if you were served by mail or you were served outside of Michigan).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date	Expiration date*	Court clerk <i>Jerome W. Zimmer Jr.</i>
------------	------------------	---

*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

PROOF OF SERVICE

TO PROCESS SERVER: You must serve the summons and complaint and file proof of service with the court clerk before the expiration date on the summons. If you are unable to complete service, you must return this original and all copies to the court clerk.

CERTIFICATE OF SERVICE / NONSERVICE

☐ I served ☐ personally ☐ by registered or certified mail, return receipt requested, and delivery restricted to the addressee (copy of return receipt attached) a copy of the summons and the complaint, together with the attachments listed below, on:

☐ I have attempted to serve a copy of the summons and complaint, together with the attachments listed below, and have been unable to complete service on:

Name	Date and time of service
Place or address of service	
Attachments (if any)	

☐ I am a sheriff, deputy sheriff, bailiff, appointed court officer or attorney for a party.

☐ I am a legally competent adult who is not a party or an officer of a corporate party. I declare under the penalties of perjury that this certificate of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee \$	Miles traveled	Fee \$	
Incorrect address fee \$	Miles traveled	Fee \$	TOTAL FEE \$

Signature _____

Name (type or print) _____

ACKNOWLEDGMENT OF SERVICE

I acknowledge that I have received service of a copy of the summons and complaint, together with

Attachments (if any) _____ on _____
Date and time

Signature _____ on behalf of _____

Name (type or print) _____

STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT COURT OF CLAIMS COUNTY	SUMMONS	CASE NUMBER
--	----------------	--------------------

Court address

Hall of Justice, 925 W. Ottawa Street, Lansing, MI 48909

Court telephone number

517-373-0807

Plaintiff's name, address, and telephone number

Michigan House of Representatives
100 N. Capitol Avenue
Lansing, Michigan 48909

v

Defendant's name, address, and telephone number

Department of Treasury
and Director Rachael Eubanks
430 W. Allegan Street
Lansing, MI 48933
517-373-3223

Plaintiff's attorney bar number, address, and telephone number

Sean TH Dutton (P77515)
KIENBAUM HARDY VIVIANO PELTON & FORREST, P.L.C.
280 N. Old Woodward Avenue, Suite 400
Birmingham, Michigan 48009

Instructions: Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (MC 21). The summons section will be completed by the court clerk.

Domestic Relations Case

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

Civil Case

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in ☐ this court, ☐ _____ Court, where

it was given case number _____ and assigned to Judge _____

The action ☐ remains ☐ is no longer pending.

Summons section completed by court clerk.

SUMMONS
NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party **or take other lawful action with the court** (28 days if you were served by mail or you were served outside of Michigan).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date	Expiration date*	Court clerk <i>Jerome W. Zimmer Jr.</i>
------------	------------------	---

*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

PROOF OF SERVICE

TO PROCESS SERVER: You must serve the summons and complaint and file proof of service with the court clerk before the expiration date on the summons. If you are unable to complete service, you must return this original and all copies to the court clerk.

CERTIFICATE OF SERVICE / NONSERVICE

☐ I served ☐ personally ☐ by registered or certified mail, return receipt requested, and delivery restricted to the addressee (copy of return receipt attached) a copy of the summons and the complaint, together with the attachments listed below, on:

☐ I have attempted to serve a copy of the summons and complaint, together with the attachments listed below, and have been unable to complete service on:

Name	Date and time of service
Place or address of service	
Attachments (if any)	

☐ I am a sheriff, deputy sheriff, bailiff, appointed court officer or attorney for a party.

☐ I am a legally competent adult who is not a party or an officer of a corporate party. I declare under the penalties of perjury that this certificate of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee \$	Miles traveled	Fee \$	
Incorrect address fee \$	Miles traveled	Fee \$	TOTAL FEE \$

Signature _____

Name (type or print) _____

ACKNOWLEDGMENT OF SERVICE

I acknowledge that I have received service of a copy of the summons and complaint, together with

Attachments (if any) _____ on _____
Date and time

Signature _____ on behalf of _____

Name (type or print) _____

STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT COURT OF CLAIMS COUNTY	SUMMONS	CASE NUMBER
--	----------------	--------------------

Court address

Hall of Justice, 925 W. Ottawa Street, Lansing, MI 48909

Court telephone number

517-373-0807

Plaintiff's name, address, and telephone number

Michigan House of Representatives
100 N. Capitol Avenue
Lansing, Michigan 48909

v

Defendant's name, address, and telephone number

Department of Corrections
and Director Heidi Washington
206 E. Michigan Avenue
Lansing, MI 48933
517-335-2243

Plaintiff's attorney bar number, address, and telephone number

Sean TH Dutton (P77515)
KIENBAUM HARDY VIVIANO PELTON & FORREST, P.L.C.
280 N. Old Woodward Avenue, Suite 400
Birmingham, Michigan 48009

Instructions: Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (MC 21). The summons section will be completed by the court clerk.

Domestic Relations Case

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

Civil Case

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in ☐ this court, ☐ _____ Court, where

it was given case number _____ and assigned to Judge _____

The action ☐ remains ☐ is no longer pending.


Summons section completed by court clerk.

SUMMONS**NOTICE TO THE DEFENDANT:** In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party **or take other lawful action with the court** (28 days if you were served by mail or you were served outside of Michigan).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date	Expiration date*	Court clerk <i>Jerome W. Zimmer Jr.</i>
------------	------------------	--

*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

PROOF OF SERVICE

TO PROCESS SERVER: You must serve the summons and complaint and file proof of service with the court clerk before the expiration date on the summons. If you are unable to complete service, you must return this original and all copies to the court clerk.

CERTIFICATE OF SERVICE / NONSERVICE

☐ I served ☐ personally ☐ by registered or certified mail, return receipt requested, and delivery restricted to the addressee (copy of return receipt attached) a copy of the summons and the complaint, together with the attachments listed below, on:

☐ I have attempted to serve a copy of the summons and complaint, together with the attachments listed below, and have been unable to complete service on:

Name	Date and time of service
Place or address of service	
Attachments (if any)	

☐ I am a sheriff, deputy sheriff, bailiff, appointed court officer or attorney for a party.

☐ I am a legally competent adult who is not a party or an officer of a corporate party. I declare under the penalties of perjury that this certificate of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee \$	Miles traveled	Fee \$	
Incorrect address fee \$	Miles traveled	Fee \$	TOTAL FEE \$

Signature _____

Name (type or print) _____

ACKNOWLEDGMENT OF SERVICE

I acknowledge that I have received service of a copy of the summons and complaint, together with

Attachments (if any) _____ on _____
Date and time

Signature _____ on behalf of _____

Name (type or print) _____

STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT COURT OF CLAIMS COUNTY	SUMMONS	CASE NUMBER
--	----------------	--------------------

Court address Hall of Justice, 925 W. Ottawa Street, Lansing, MI 48909 **Court telephone number** 517-373-0807

Plaintiff's name, address, and telephone number Michigan House of Representatives 100 N. Capitol Avenue Lansing, Michigan 48909	v	Defendant's name, address, and telephone number Department of Education and Director Dr. Glenn Maleyko 608 W. Allegan Lansing, MI 48933 833-633-5788
Plaintiff's attorney bar number, address, and telephone number Sean TH Dutton (P77515) KIENBAUM HARDY VIVIANO PELTON & FORREST, P.L.C. 280 N. Old Woodward Avenue, Suite 400 Birmingham, Michigan 48009		

Instructions: Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (MC 21). The summons section will be completed by the court clerk.

Domestic Relations Case

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

Civil Case

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in ☐ this court, ☐ _____ Court, where

it was given case number _____ and assigned to Judge _____

The action ☐ remains ☐ is no longer pending.

Summons section completed by court clerk.

SUMMONS



NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party **or take other lawful action with the court** (28 days if you were served by mail or you were served outside of Michigan).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date	Expiration date*	Court clerk <i>Jerome W. Zimmer Jr.</i>
------------	------------------	---

*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

PROOF OF SERVICE

TO PROCESS SERVER: You must serve the summons and complaint and file proof of service with the court clerk before the expiration date on the summons. If you are unable to complete service, you must return this original and all copies to the court clerk.

CERTIFICATE OF SERVICE / NONSERVICE

☐ I served ☐ personally ☐ by registered or certified mail, return receipt requested, and delivery restricted to the addressee (copy of return receipt attached) a copy of the summons and the complaint, together with the attachments listed below, on:

☐ I have attempted to serve a copy of the summons and complaint, together with the attachments listed below, and have been unable to complete service on:

Name	Date and time of service
Place or address of service	
Attachments (if any)	

☐ I am a sheriff, deputy sheriff, bailiff, appointed court officer or attorney for a party.

☐ I am a legally competent adult who is not a party or an officer of a corporate party. I declare under the penalties of perjury that this certificate of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee \$	Miles traveled	Fee \$	
Incorrect address fee \$	Miles traveled	Fee \$	TOTAL FEE \$

Signature _____

Name (type or print) _____

ACKNOWLEDGMENT OF SERVICE

I acknowledge that I have received service of a copy of the summons and complaint, together with

Attachments (if any) _____ on _____
Date and time

Signature _____ on behalf of _____

Name (type or print) _____

STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT COURT OF CLAIMS COUNTY	SUMMONS	CASE NUMBER
--	----------------	--------------------

Court address
Hall of Justice, 925 W. Ottawa Street, Lansing, MI 48909

Court telephone number
517-373-0807

Plaintiff's name, address, and telephone number Michigan House of Representatives 100 N. Capitol Avenue Lansing, Michigan 48909	v	Defendant's name, address, and telephone number Department of Environment, Great Lakes, and Energy and Director Phillip Roos 525 W. Allegan Street Lansing, MI 48909 800-662-9278
Plaintiff's attorney bar number, address, and telephone number Sean TH Dutton (P77515) KIENBAUM HARDY VIVIANO PELTON & FORREST, P.L.C. 280 N. Old Woodward Avenue, Suite 400 Birmingham, Michigan 48009		

Instructions: Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (MC 21). The summons section will be completed by the court clerk.

Domestic Relations Case

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

Civil Case

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in ☐ this court, ☐ _____ Court, where

it was given case number _____ and assigned to Judge _____

The action ☐ remains ☐ is no longer pending.

Summons section completed by court clerk.

SUMMONS



NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party **or take other lawful action with the court** (28 days if you were served by mail or you were served outside of Michigan).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date	Expiration date*	Court clerk <i>Jerome W. Zimmer Jr.</i>
------------	------------------	--

*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

PROOF OF SERVICE

TO PROCESS SERVER: You must serve the summons and complaint and file proof of service with the court clerk before the expiration date on the summons. If you are unable to complete service, you must return this original and all copies to the court clerk.

CERTIFICATE OF SERVICE / NONSERVICE

☐ I served ☐ personally ☐ by registered or certified mail, return receipt requested, and delivery restricted to the addressee (copy of return receipt attached) a copy of the summons and the complaint, together with the attachments listed below, on:

☐ I have attempted to serve a copy of the summons and complaint, together with the attachments listed below, and have been unable to complete service on:

Name	Date and time of service
Place or address of service	
Attachments (if any)	

☐ I am a sheriff, deputy sheriff, bailiff, appointed court officer or attorney for a party.

☐ I am a legally competent adult who is not a party or an officer of a corporate party. I declare under the penalties of perjury that this certificate of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee \$	Miles traveled	Fee \$	
Incorrect address fee \$	Miles traveled	Fee \$	TOTAL FEE \$

Signature _____

Name (type or print) _____

ACKNOWLEDGMENT OF SERVICE

I acknowledge that I have received service of a copy of the summons and complaint, together with

Attachments (if any) _____ on _____ Date and time _____

Signature _____ on behalf of _____

Name (type or print) _____

STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT COURT OF CLAIMS COUNTY	SUMMONS	CASE NUMBER
--	----------------	--------------------

Court address Hall of Justice, 925 W. Ottawa Street, Lansing, MI 48909 **Court telephone number** 517-373-0807

Plaintiff's name, address, and telephone number Michigan House of Representatives 100 N. Capitol Avenue Lansing, Michigan 48909	v	Defendant's name, address, and telephone number Department of Licensing and Regulatory Affairs and Director Marlon Brown 611 W. Ottawa Street Lansing, MI 48933 517-335-9700
Plaintiff's attorney bar number, address, and telephone number Sean TH Dutton (P77515) KIENBAUM HARDY VIVIANO PELTON & FORREST, P.L.C. 280 N. Old Woodward Avenue, Suite 400 Birmingham, Michigan 48009		

Instructions: Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (MC 21). The summons section will be completed by the court clerk.

Domestic Relations Case

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

Civil Case

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in ☐ this court, ☐ _____ Court, where

it was given case number _____ and assigned to Judge _____

The action ☐ remains ☐ is no longer pending.

Summons section completed by court clerk.

SUMMONS



NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party **or take other lawful action with the court** (28 days if you were served by mail or you were served outside of Michigan).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date	Expiration date*	Court clerk <i>Jerome W. Zimmer Jr.</i>
------------	------------------	---

*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

PROOF OF SERVICE

TO PROCESS SERVER: You must serve the summons and complaint and file proof of service with the court clerk before the expiration date on the summons. If you are unable to complete service, you must return this original and all copies to the court clerk.

CERTIFICATE OF SERVICE / NONSERVICE

☐ I served ☐ personally ☐ by registered or certified mail, return receipt requested, and delivery restricted to the addressee (copy of return receipt attached) a copy of the summons and the complaint, together with the attachments listed below, on:

☐ I have attempted to serve a copy of the summons and complaint, together with the attachments listed below, and have been unable to complete service on:

Name	Date and time of service
Place or address of service	
Attachments (if any)	

☐ I am a sheriff, deputy sheriff, bailiff, appointed court officer or attorney for a party.

☐ I am a legally competent adult who is not a party or an officer of a corporate party. I declare under the penalties of perjury that this certificate of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee \$	Miles traveled	Fee \$	
Incorrect address fee \$	Miles traveled	Fee \$	TOTAL FEE \$

Signature _____

Name (type or print) _____

ACKNOWLEDGMENT OF SERVICE

I acknowledge that I have received service of a copy of the summons and complaint, together with

Attachments (if any) _____ on _____ Date and time _____

Signature _____ on behalf of _____

Name (type or print) _____

STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT COURT OF CLAIMS COUNTY	SUMMONS	CASE NUMBER
--	----------------	--------------------

Court address

Hall of Justice, 925 W. Ottawa Street, Lansing, MI 48909

Court telephone number

517-373-0807

Plaintiff's name, address, and telephone number

Michigan House of Representatives
100 N. Capitol Avenue
Lansing, Michigan 48909

v

Defendant's name, address, and telephone number

Department of Health and Human Services
and Director Elizabeth Hertel
333 S. Grand Avenue
Lansing, Michigan 48909
517-241-3740

Plaintiff's attorney bar number, address, and telephone number

Sean TH Dutton (P77515)
KIENBAUM HARDY VIVIANO PELTON & FORREST, P.L.C.
280 N. Old Woodward Avenue, Suite 400
Birmingham, Michigan 48009

Instructions: Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (MC 21). The summons section will be completed by the court clerk.

Domestic Relations Case

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

Civil Case

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in ☐ this court, ☐ _____ Court, where

it was given case number _____ and assigned to Judge _____

The action ☐ remains ☐ is no longer pending.

Summons section completed by court clerk.

SUMMONS**NOTICE TO THE DEFENDANT:** In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party **or take other lawful action with the court** (28 days if you were served by mail or you were served outside of Michigan).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date	Expiration date*	Court clerk <i>Jerome W. Zimmer Jr.</i>
------------	------------------	---

*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

PROOF OF SERVICE

TO PROCESS SERVER: You must serve the summons and complaint and file proof of service with the court clerk before the expiration date on the summons. If you are unable to complete service, you must return this original and all copies to the court clerk.

CERTIFICATE OF SERVICE / NONSERVICE

☐ I served ☐ personally ☐ by registered or certified mail, return receipt requested, and delivery restricted to the addressee (copy of return receipt attached) a copy of the summons and the complaint, together with the attachments listed below, on:

☐ I have attempted to serve a copy of the summons and complaint, together with the attachments listed below, and have been unable to complete service on:

Name	Date and time of service
Place or address of service	
Attachments (if any)	

☐ I am a sheriff, deputy sheriff, bailiff, appointed court officer or attorney for a party.

☐ I am a legally competent adult who is not a party or an officer of a corporate party. I declare under the penalties of perjury that this certificate of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee \$	Miles traveled	Fee \$	
Incorrect address fee \$	Miles traveled	Fee \$	TOTAL FEE \$

Signature _____

Name (type or print) _____

ACKNOWLEDGMENT OF SERVICE

I acknowledge that I have received service of a copy of the summons and complaint, together with

Attachments (if any) _____ on _____ Date and time _____

Signature _____ on behalf of _____

Name (type or print) _____

STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT COURT OF CLAIMS COUNTY	SUMMONS	CASE NUMBER
--	----------------	--------------------

Court address
Hall of Justice, 925 W. Ottawa Street, Lansing, MI 48909

Court telephone number
517-373-0807

Plaintiff's name, address, and telephone number Michigan House of Representatives 100 N. Capitol Avenue Lansing, Michigan 48909	v	Defendant's name, address, and telephone number Department of State and Secretary Jocelyn Benson 430 W. Allegan Street Richard H. Austin Building - 4th Floor Lansing, MI 48918 888-767-6424
Plaintiff's attorney bar number, address, and telephone number Sean TH Dutton (P77515) KIENBAUM HARDY VIVIANO PELTON & FORREST, P.L.C. 280 N. Old Woodward Avenue, Suite 400 Birmingham, Michigan 48009		

Instructions: Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (MC 21). The summons section will be completed by the court clerk.

Domestic Relations Case

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

Civil Case

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in ☐ this court, ☐ _____ Court, where

it was given case number _____ and assigned to Judge _____

The action ☐ remains ☐ is no longer pending.

Summons section completed by court clerk.

SUMMONS



NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party **or take other lawful action with the court** (28 days if you were served by mail or you were served outside of Michigan).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date	Expiration date*	Court clerk <i>Jerome W. Zimmer Jr.</i>
------------	------------------	--

*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

PROOF OF SERVICE

TO PROCESS SERVER: You must serve the summons and complaint and file proof of service with the court clerk before the expiration date on the summons. If you are unable to complete service, you must return this original and all copies to the court clerk.

CERTIFICATE OF SERVICE / NONSERVICE

☐ I served ☐ personally ☐ by registered or certified mail, return receipt requested, and delivery restricted to the addressee (copy of return receipt attached) a copy of the summons and the complaint, together with the attachments listed below, on:

☐ I have attempted to serve a copy of the summons and complaint, together with the attachments listed below, and have been unable to complete service on:

Name	Date and time of service
Place or address of service	
Attachments (if any)	

☐ I am a sheriff, deputy sheriff, bailiff, appointed court officer or attorney for a party.

☐ I am a legally competent adult who is not a party or an officer of a corporate party. I declare under the penalties of perjury that this certificate of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee \$	Miles traveled	Fee \$	
Incorrect address fee \$	Miles traveled	Fee \$	TOTAL FEE \$

Signature _____

Name (type or print) _____

ACKNOWLEDGMENT OF SERVICE

I acknowledge that I have received service of a copy of the summons and complaint, together with

Attachments (if any) _____ on _____
Date and time

Signature _____ on behalf of _____

Name (type or print) _____

STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT COURT OF CLAIMS COUNTY	SUMMONS	CASE NUMBER
--	----------------	--------------------

Court address Hall of Justice, 925 W. Ottawa Street, Lansing, MI 48909 **Court telephone number** 517-373-0807

Plaintiff's name, address, and telephone number Michigan House of Representatives 100 N. Capitol Avenue Lansing, Michigan 48909	v	Defendant's name, address, and telephone number Department of Transportation and Director Bradley Wieferich State Transportation Building 425 W. Ottawa Street Lansing, MI 48909 517-241-2400
Plaintiff's attorney bar number, address, and telephone number Sean TH Dutton (P77515) KIENBAUM HARDY VIVIANO PELTON & FORREST, P.L.C. 280 N. Old Woodward Avenue, Suite 400 Birmingham, Michigan 48009		

Instructions: Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (MC 21). The summons section will be completed by the court clerk.

Domestic Relations Case

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

Civil Case

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in ☐ this court, ☐ _____ Court, where

it was given case number _____ and assigned to Judge _____

The action ☐ remains ☐ is no longer pending.

Summons section completed by court clerk.

SUMMONS



NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party **or take other lawful action with the court** (28 days if you were served by mail or you were served outside of Michigan).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date	Expiration date*	Court clerk <i>Jerome W. Zimmer Jr.</i>
------------	------------------	---

*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

PROOF OF SERVICE

TO PROCESS SERVER: You must serve the summons and complaint and file proof of service with the court clerk before the expiration date on the summons. If you are unable to complete service, you must return this original and all copies to the court clerk.

CERTIFICATE OF SERVICE / NONSERVICE

☐ I served ☐ personally ☐ by registered or certified mail, return receipt requested, and delivery restricted to the addressee (copy of return receipt attached) a copy of the summons and the complaint, together with the attachments listed below, on:

☐ I have attempted to serve a copy of the summons and complaint, together with the attachments listed below, and have been unable to complete service on:

Name	Date and time of service
Place or address of service	
Attachments (if any)	

☐ I am a sheriff, deputy sheriff, bailiff, appointed court officer or attorney for a party.

☐ I am a legally competent adult who is not a party or an officer of a corporate party. I declare under the penalties of perjury that this certificate of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee \$	Miles traveled	Fee \$	
Incorrect address fee \$	Miles traveled	Fee \$	TOTAL FEE \$

Signature _____

Name (type or print) _____

ACKNOWLEDGMENT OF SERVICE

I acknowledge that I have received service of a copy of the summons and complaint, together with

Attachments (if any) _____ on _____
Date and time

Signature _____ on behalf of _____

Name (type or print) _____

STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT COURT OF CLAIMS COUNTY	SUMMONS	CASE NUMBER
--	----------------	--------------------

Court address Hall of Justice, 925 W. Ottawa Street, Lansing, MI 48909 **Court telephone number** 517-373-0807

Plaintiff's name, address, and telephone number Michigan House of Representatives 100 N. Capitol Avenue Lansing, Michigan 48909	v	Defendant's name, address, and telephone number Department of Natural Resources and Director Scott Bowen 525 W. Allegan Street Lansing, MI 48933 517-284-6367
Plaintiff's attorney bar number, address, and telephone number Sean TH Dutton (P77515) KIENBAUM HARDY VIVIANO PELTON & FORREST, P.L.C. 280 N. Old Woodward Avenue, Suite 400 Birmingham, Michigan 48009		

Instructions: Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (MC 21). The summons section will be completed by the court clerk.

Domestic Relations Case

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

Civil Case

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in ☐ this court, ☐ _____ Court, where

it was given case number _____ and assigned to Judge _____

The action ☐ remains ☐ is no longer pending.

Summons section completed by court clerk.

SUMMONS



NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party **or take other lawful action with the court** (28 days if you were served by mail or you were served outside of Michigan).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date	Expiration date*	Court clerk <i>Jerome W. Zimmer Jr.</i>
------------	------------------	---

*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

PROOF OF SERVICE

TO PROCESS SERVER: You must serve the summons and complaint and file proof of service with the court clerk before the expiration date on the summons. If you are unable to complete service, you must return this original and all copies to the court clerk.

CERTIFICATE OF SERVICE / NONSERVICE

☐ I served ☐ personally ☐ by registered or certified mail, return receipt requested, and delivery restricted to the addressee (copy of return receipt attached) a copy of the summons and the complaint, together with the attachments listed below, on:

☐ I have attempted to serve a copy of the summons and complaint, together with the attachments listed below, and have been unable to complete service on:

Name	Date and time of service
Place or address of service	
Attachments (if any)	

☐ I am a sheriff, deputy sheriff, bailiff, appointed court officer or attorney for a party.

☐ I am a legally competent adult who is not a party or an officer of a corporate party. I declare under the penalties of perjury that this certificate of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee \$	Miles traveled	Fee \$	
Incorrect address fee \$	Miles traveled	Fee \$	TOTAL FEE \$

Signature _____

Name (type or print) _____

ACKNOWLEDGMENT OF SERVICE

I acknowledge that I have received service of a copy of the summons and complaint, together with

Attachments (if any) _____ on _____
Date and time

Signature _____ on behalf of _____

Name (type or print) _____

STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT COURT OF CLAIMS COUNTY	SUMMONS	CASE NUMBER
--	----------------	--------------------

Court address Hall of Justice, 925 W. Ottawa Street, Lansing, MI 48909 **Court telephone number** 517-373-0807

Plaintiff's name, address, and telephone number Michigan House of Representatives 100 N. Capitol Avenue Lansing, Michigan 48909	v	Defendant's name, address, and telephone number Michigan Strategic Fund Michigan Economic Development Corporation and CEO Quentin Messer 300 N. Washington Square Lansing, MI 48913 888-522-0103
Plaintiff's attorney bar number, address, and telephone number Sean TH Dutton (P77515) KIENBAUM HARDY VIVIANO PELTON & FORREST, P.L.C. 280 N. Old Woodward Avenue, Suite 400 Birmingham, Michigan 48009		

Instructions: Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (MC 21). The summons section will be completed by the court clerk.

Domestic Relations Case

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

Civil Case

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in ☐ this court, ☐ _____ Court, where

it was given case number _____ and assigned to Judge _____

The action ☐ remains ☐ is no longer pending.

Summons section completed by court clerk.

SUMMONS



NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party **or take other lawful action with the court** (28 days if you were served by mail or you were served outside of Michigan).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date	Expiration date*	Court clerk <i>Jerome W. Zimmer Jr.</i>
------------	------------------	---

*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

PROOF OF SERVICE

TO PROCESS SERVER: You must serve the summons and complaint and file proof of service with the court clerk before the expiration date on the summons. If you are unable to complete service, you must return this original and all copies to the court clerk.

CERTIFICATE OF SERVICE / NONSERVICE

☐ I served ☐ personally ☐ by registered or certified mail, return receipt requested, and delivery restricted to the addressee (copy of return receipt attached) a copy of the summons and the complaint, together with the attachments listed below, on:

☐ I have attempted to serve a copy of the summons and complaint, together with the attachments listed below, and have been unable to complete service on:

Name	Date and time of service
Place or address of service	
Attachments (if any)	

☐ I am a sheriff, deputy sheriff, bailiff, appointed court officer or attorney for a party.

☐ I am a legally competent adult who is not a party or an officer of a corporate party. I declare under the penalties of perjury that this certificate of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee \$	Miles traveled	Fee \$	
Incorrect address fee \$	Miles traveled	Fee \$	TOTAL FEE \$

Signature _____

Name (type or print) _____

ACKNOWLEDGMENT OF SERVICE

I acknowledge that I have received service of a copy of the summons and complaint, together with

Attachments (if any) _____ on _____
Date and time

Signature _____ on behalf of _____

Name (type or print) _____

STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT COURT OF CLAIMS COUNTY	SUMMONS	CASE NUMBER
--	----------------	--------------------

Court address
Hall of Justice, 925 W. Ottawa Street, Lansing, MI 48909

Court telephone number
517-373-0807

Plaintiff's name, address, and telephone number Michigan House of Representatives 100 N. Capitol Avenue Lansing, Michigan 48909	v	Defendant's name, address, and telephone number Michigan Gaming Control Board and Director Henry Williams 3062 W. Grand Boulevard, Suite L-700 Detroit, MI 48202 313-456-4100
Plaintiff's attorney bar number, address, and telephone number Sean TH Dutton (P77515) KIENBAUM HARDY VIVIANO PELTON & FORREST, P.L.C. 280 N. Old Woodward Avenue, Suite 400 Birmingham, Michigan 48009		

Instructions: Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (MC 21). The summons section will be completed by the court clerk.

Domestic Relations Case

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

Civil Case

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in ☐ this court, ☐ _____ Court, where

it was given case number _____ and assigned to Judge _____

The action ☐ remains ☐ is no longer pending.



Summons section completed by court clerk.

SUMMONS

NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party **or take other lawful action with the court** (28 days if you were served by mail or you were served outside of Michigan).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date	Expiration date*	Court clerk <i>Jerome W. Zimmer Jr.</i>
------------	------------------	---

*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

PROOF OF SERVICE

TO PROCESS SERVER: You must serve the summons and complaint and file proof of service with the court clerk before the expiration date on the summons. If you are unable to complete service, you must return this original and all copies to the court clerk.

CERTIFICATE OF SERVICE / NONSERVICE

☐ I served ☐ personally ☐ by registered or certified mail, return receipt requested, and delivery restricted to the addressee (copy of return receipt attached) a copy of the summons and the complaint, together with the attachments listed below, on:

☐ I have attempted to serve a copy of the summons and complaint, together with the attachments listed below, and have been unable to complete service on:

Name	Date and time of service
Place or address of service	
Attachments (if any)	

☐ I am a sheriff, deputy sheriff, bailiff, appointed court officer or attorney for a party.

☐ I am a legally competent adult who is not a party or an officer of a corporate party. I declare under the penalties of perjury that this certificate of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee \$	Miles traveled	Fee \$	
Incorrect address fee \$	Miles traveled	Fee \$	TOTAL FEE \$

Signature _____

Name (type or print) _____

ACKNOWLEDGMENT OF SERVICE

I acknowledge that I have received service of a copy of the summons and complaint, together with

Attachments (if any) _____ on _____
Date and time

Signature _____ on behalf of _____

Name (type or print) _____

STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT COURT OF CLAIMS COUNTY	SUMMONS	CASE NUMBER
---	----------------	--------------------

Court address Hall of Justice, 925 W. Ottawa Street, Lansing, MI 48909

Court telephone number 517-373-0807

Plaintiff's name, address, and telephone number Michigan House of Representatives 100 N. Capitol Avenue Lansing, Michigan 48909	v	Defendant's name, address, and telephone number Bureau of State Lottery and Acting Commissioner Joseph Froehlich 101 E. Hillsdale Street Lansing, MI 48909 844-917-6325
Plaintiff's attorney bar number, address, and telephone number Sean TH Dutton (P77515) KIENBAUM HARDY VIVIANO PELTON & FORREST, P.L.C. 280 N. Old Woodward Avenue, Suite 400 Birmingham, Michigan 48009		

Instructions: Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (MC 21). The summons section will be completed by the court clerk.

Domestic Relations Case

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

Civil Case

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in ☐ this court, ☐ _____ Court, where

it was given case number _____ and assigned to Judge _____

The action ☐ remains ☐ is no longer pending.

Summons section completed by court clerk.

SUMMONS



NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party **or take other lawful action with the court** (28 days if you were served by mail or you were served outside of Michigan).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date	Expiration date*	Court clerk <i>Jerome W. Zimmer Jr.</i>
------------	------------------	---

*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

PROOF OF SERVICE

TO PROCESS SERVER: You must serve the summons and complaint and file proof of service with the court clerk before the expiration date on the summons. If you are unable to complete service, you must return this original and all copies to the court clerk.

CERTIFICATE OF SERVICE / NONSERVICE

☐ I served ☐ personally ☐ by registered or certified mail, return receipt requested, and delivery restricted to the addressee (copy of return receipt attached) a copy of the summons and the complaint, together with the attachments listed below, on:

☐ I have attempted to serve a copy of the summons and complaint, together with the attachments listed below, and have been unable to complete service on:

Name	Date and time of service
Place or address of service	
Attachments (if any)	

☐ I am a sheriff, deputy sheriff, bailiff, appointed court officer or attorney for a party.

☐ I am a legally competent adult who is not a party or an officer of a corporate party. I declare under the penalties of perjury that this certificate of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee \$	Miles traveled	Fee \$	
Incorrect address fee \$	Miles traveled	Fee \$	TOTAL FEE \$

Signature _____

Name (type or print) _____

ACKNOWLEDGMENT OF SERVICE

I acknowledge that I have received service of a copy of the summons and complaint, together with

Attachments (if any) _____ on _____ Date and time _____

Signature _____ on behalf of _____

Name (type or print) _____

STATE OF MICHIGAN
IN THE COURT OF CLAIMS

Case No. 26–_000007-MB

The Michigan House of Representatives,
Plaintiff,

Hon. Michael F. Gadola

v.

Department of Technology, Management and Budget; Michelle Lange, in her official capacity as Director of the Department of Technology, Management and Budget; State Budget Office; Jen Flood, in her official capacity as Director of the State Budget Office; Department of Labor and Economic Opportunity; Susan Corbin, in her official capacity as Director of the Department of Labor and Economic Opportunity; Department of Treasury; Rachael Eubanks, in her official capacity as Director of the Department of Treasury; Department of Corrections; Heidi Washington, in her official capacity as Director of the Department of Corrections; Department of Education; Dr. Glenn Maleyko, in his official capacity as State Superintendent of Public Instruction; Department of Environment, Great Lakes, and Energy; Phillip Roos, in his official capacity as Director of the Department of Environment, Great Lakes, and Energy; Department of Licensing and Regulatory Affairs; Marlon Brown, in his official capacity as Director of the Department of Licensing and Regulatory Affairs; Department of Health and Human Services; Elizabeth Hertel, in her official capacity as Director of the Department of Health and Human Services; Department of State; Jocelyn Benson, in her official capacity as Secretary of State; Department of Transportation; Bradley Wieferich, in his official capacity as Director of the Department of Transportation; Department of Natural Resources;

RECEIVED by MCCOC 1/9/2026 2:13:19 PM

Scott Bowen, in his official capacity as Director of the Department of Natural Resources; Michigan Strategic Fund; Michigan Economic Development Corporation; Quentin Messer, in his official capacity as Chief Executive Officer of the Michigan Economic Development Corporation; Michigan Gaming Control Board; Henry Williams, in his official capacity as Executive Director of the Michigan Gaming Control Board; Bureau of State Lottery; Joseph Froehlich, in his official capacity as Acting Commissioner of the Bureau of State Lottery,

Defendants.

KIENBAUM HARDY VIVIANO
PELTON & FORREST, P.L.C.

By: Sean T.H. Dutton (P77515)

David A. Porter (P76785)

Walter Pelton (P84442)

Co-Counsel for Plaintiff

280 N. Old Woodward Ave., Ste. 400

Birmingham, MI 48009

(248) 645-0000

sutton@khvpf.com

dporter@khvpf.com

BURSCH LAW PLLC

John J. Bursch (P57679)

Co-Counsel for Plaintiff

9339 Cherry Valley Ave. SE, #78

Caledonia, MI 49316

(616) 450-4235

jbursch@burschlaw.com

VERIFIED COMPLAINT FOR IMMEDIATE INJUNCTIVE RELIEF

There is no other pending or resolved civil action arising out of the transaction or occurrence alleged in the complaint.

Plaintiff, the Michigan House of Representatives, through its attorneys and for its verified complaint against Defendants states the following:

INTRODUCTION

1. This case presents a fundamental constitutional crisis precipitated by the Executive Branch’s unilateral seizure of the legislative power of the purse.

2. Under the Michigan Constitution, the power to appropriate funds—including the power to determine when those funds expire—belongs exclusively to the Legislature. While the Legislature typically limits appropriations to a single fiscal year, it has enacted a narrow statutory mechanism, MCL 18.1451a(3), that allows the State Budget Director to propose extending that timeline for specific “work projects,” subject to a crucial check: the proposal is “not effective” if disapproved by the House or Senate Appropriations Committee.

3. On December 10, 2025, the House Appropriations Committee exercised this statutory authority to disapprove \$644.9 million in proposed work projects. Under the plain text of the Management and Budget Act, that disapproval mandated that these funds lapse to the General Fund.

4. Yet, relying on an Attorney General opinion issued less than 48 hours ago, Defendants have declared this statutory check unconstitutional, ignored the Committee’s vote, and “activated” the spending codes to seize these expired funds for immediate expenditure.

5. The Executive Branch’s actions are doubly unlawful. First, the legislative appropriations committees’ disapproval power is a valid constitutional condition on the delegated authority to extend appropriations. Second, even if the Attorney General were correct that the legislative check is unconstitutional, the Executive cannot simply sever the condition while retaining the power it was meant to restrain. Without the legislative power to disapprove, the Director has no authority to extend these appropriations at all, and the funds must undeniably lapse by operation of law.

6. Plaintiff seeks immediate injunctive and declaratory relief to halt this unconstitutional raid on the State Treasury and to restore the separation of powers.

PARTIES, JURISDICTION & VENUE

7. Plaintiff, the Michigan House of Representatives, is one chamber of the Michigan Legislature, created by Article 4, § 1, of Michigan's 1963 Constitution.

8. Article IV, § 16 of Michigan's 1963 Constitution states that each legislative chamber has plenary authority to "determine the rules of its proceedings." House Rule 7 appoints the Speaker of the House as "chief administrator." The Speaker of the House has retained General Counsel for his chamber and delegated to General Counsel the power to speak for and make legal decisions on behalf of the chamber. The House General Counsel has both authorized the filing of this action and has retained the undersigned counsel to pursue this action.

9. Defendant Department of Technology, Management and Budget is a principal department in the executive branch of state government established through Section 121 of the Management and Budget Act of 1984 under the authority of Article 5, Section 2, of the Constitution of 1963. The Court of Claims may exercise personal jurisdiction over the Department of Management and Budget under Section 6419(1)(a) of the Court of Claims Act, MCL 600.6419(1)(a).

10. Michelle Lange is the Director of the Department of Technology, Management and Budget. Ms. Lange is sued in her official capacity. The Court of Claims may exercise personal jurisdiction over Ms. Lange under Section 6419(1)(a) of the Court of Claims Act, MCL 600.6419(1)(a).

11. Defendant Department of Technology, Management and Budget is responsible for administering the following single-year line-items appropriations in FY 2025 that the SBO Director proposed to be designated as work project appropriations, which proposal was disapproved by the House Appropriations Committee pursuant to its statutory authority under MCL 18.1451a(3):

- a. Office of State Employer (OSE) - Staff Development and Labor Relations (\$180,000)

- b. Building Operation Division (BOD) - Feminine Hygiene (\$1,214,500)
- c. Enterprisewide Information Technology Investment Projects (\$31,500,000)
- d. Make it in Michigan Competitiveness Fund (\$159,310,300)

12. Defendant State Budget Office is a state agency housed within the Department of Technology, Management and Budget. MCL 18.1321; MCL 18.441(III)(C)(1). The State Budget Office is considered a state department for jurisdictional purposes under Section 6419(7) of the Court of Claims Act, MCL 600.6419(7). The Court of Claims may exercise personal jurisdiction over SBO under Section 6419(1)(a) of the Court of Claims Act, MCL 600.6419(1)(a).

13. Jen Flood is the Director of the State Budget Office. Ms. Flood is sued in her official capacity. The Court of Claims may exercise personal jurisdiction over Ms. Flood under Section 6419(1)(a) of the Court of Claims Act, MCL 600.6419(1)(a).

14. Defendant State Budget Office is responsible for administering the following single-year line-items appropriations in FY 2025 that the SBO Director proposed to be designated as work project appropriations, which proposal was disapproved by the House Appropriations Committee pursuant to its statutory authority under MCL 18.1451a(3):

- a. Reconnect Career and Education Navigators (\$1,150,000)
- b. MCCA Local Heroes (\$250,000)
- c. Education Performance Study (\$179,500)

15. Defendant Department of Labor and Economic Opportunity is a principal department in the executive branch of state government created under Executive Order 2019-13, MCL 125.1998(1), and the authority of Article 5, Section 2, of the Constitution of 1963. The Court of Claims may exercise personal jurisdiction over the Department of Labor and Economic Opportunity under Section 6419(1)(a) of the Court of Claims Act, MCL 600.6419(1)(a).

16. Susan Corbin is the Director of the Department of Labor and Economic Opportunity. Ms. Corbin is sued in her official capacity. The Court of Claims may exercise personal jurisdiction over Ms. Corbin under Section 6419(1)(a) of the Court of Claims Act, MCL 600.6419(1)(a).

17. Defendant Department of Labor and Economic Opportunity is responsible for administering the following single-year line-items appropriations in FY 2025 that the SBO Director proposed to be designated as work project appropriations, which proposal was disapproved by the House Appropriations Committee pursuant to its statutory authority under MCL 18.1451a(3):

- a. Office of Future Mobility Electrification State (\$2,000,000)
- b. Community Enhancement Grants (\$102,611,500)
- c. Community Museum Grants (\$15,779,700)
- d. Housing Pilot Program (\$800,000)
- e. Symphony Grants (\$1,923,100)
- f. Talent and Growth (\$12,859,200)
- g. Office of Global Michigan Language Access (\$308,000)
- h. Office of Global Michigan Regional Community Collaboratives (\$1,000,000)

18. Defendant Department of Treasury is a principal department of the executive branch of state government. MCL 16.175. The Court of Claims may exercise personal jurisdiction over the department under Section 6419(1)(a) of the Revised Judicature Act, MCL 600.6419(1)(a).

19. Rachael Eubanks is the Director of the Department of Treasury. Ms. Eubanks is sued in her official capacity. The Court of Claims may exercise personal jurisdiction over Ms. Eubanks under Section 6419(1)(a) of the Court of Claims Act, MCL 600.6419(1)(a).

20. Defendant Department of Treasury is responsible for administering the following single-year line-items appropriations in FY 2025 that the SBO Director proposed to

be designated as work project appropriations, which proposal was disapproved by the House Appropriations Committee pursuant to its statutory authority under MCL 18.1451a(3):

- a. Assistance for Communities and Schools in Potential Distress (\$1,800,000)
- b. Elective Pay Ambassador Program (\$250,000)
- c. ELITES Project (\$2,401,500)
- d. Revenue Sharing Web Application IT Project (\$530,000)

21. Defendant Department of Corrections is a principal department of the executive branch of state government. MCL 16.375. The Court of Claims may exercise personal jurisdiction over the department under Section 6419(1)(a) of the Revised Judicature Act, MCL 600.6419(1)(a).

22. Heidi Washington is the Director of the Department of Corrections. Ms. Washinton is sued in her official capacity. The Court of Claims may exercise personal jurisdiction over Ms. Washington under Section 6419(1)(a) of the Court of Claims Act, MCL 600.6419(1)(a).

23. Defendant Department of Corrections is responsible for administering the following single-year line-items appropriation in FY 2025 that the SBO Director proposed to be designated as work project appropriation, which proposal was disapproved by the House Appropriations Committee pursuant to its statutory authority under MCL 18.1451a(3):

- a. Education Improvements (\$2,100,000)

24. Defendant Department of Education is a principal department of the executive branch of state government. MCL 16.400. The Court of Claims may exercise personal jurisdiction over the department under Section 6419(1)(a) of the Revised Judicature Act, MCL 600.6419(1)(a).

25. Dr. Glenn Maleyko is the State Superintendent of Public Instruction and directs the Department of Education. Dr. Maleyko is sued in his official capacity. The Court of Claims

may exercise personal jurisdiction over Dr. Maleyko under Section 6419(1)(a) of the Court of Claims Act, MCL 600.6419(1)(a).

26. Defendant Department of Education is responsible for administering the following single-year line-items appropriations in FY 2025 that the SBO Director proposed to be designated as work project appropriations, which proposal was disapproved by the House Appropriations Committee pursuant to its statutory authority under MCL 18.1451a(3):

- a. Indigenous Tribal History Prof Learning Project (\$750,000)
- b. Charter School Transparency Database (\$132,700)
- c. Talent Together Coalition (\$12,500,000)
- d. Drinking Water Declaration of Emergency (\$6,780,000)
- e. Firearms Storage Tip Line (\$1,000,000)
- f. MI Creative Potential (\$2,500,000)

27. Defendant Department of Environment, Great Lakes, and Energy is a principal department of the executive branch of state government. MCL 16.175. The Court of Claims may exercise personal jurisdiction over the department under Section 6419(1)(a) of the Revised Judicature Act, MCL 600.6419(1)(a).

28. Phillip Roos is the Director of the Department of Environment, Great Lakes, and Energy. Mr. Roos is sued in his official capacity. The Court of Claims may exercise personal jurisdiction over Mr. Roos under Section 6419(1)(a) of the Court of Claims Act, MCL 600.6419(1)(a).

29. Defendant Department of Environment, Great Lakes, and Energy is responsible for administering the following single-year line-items appropriations in FY 2025 that the SBO Director proposed to be designated as work project appropriations, which proposal was disapproved by the House Appropriations Committee pursuant to its statutory authority under MCL 18.1451a(3):

- a. AmeriCorps (\$796,800)

- b. Lake Michigan Circuit - Phase I (\$325,000)
- c. Michigan Energy Academy (\$1,980,000)
- d. Clean Michigan Initiative (\$15,000,000)

30. Defendant Department of Licensing and Regulatory Affairs is a principal department of the executive branch of state government. MCL 16.325. The Court of Claims may exercise personal jurisdiction over the department under Section 6419(1)(a) of the Revised Judicature Act, MCL 600.6419(1)(a).

31. Marlon Brown is the Director of the Department of Licensing and Regulatory Affairs. Mr. Brown is sued in his official capacity. The Court of Claims may exercise personal jurisdiction over Mr. Brown under Section 6419(1)(a) of the Court of Claims Act, MCL 600.6419(1)(a).

32. Defendant Department of Licensing and Regulatory Affairs is responsible for administering the following single-year line-items appropriations in FY 2025 that the SBO Director proposed to be designated as work project appropriations, which proposal was disapproved by the House Appropriations Committee pursuant to its statutory authority under MCL 18.1451a(3):

- a. Indigent Defense Commission Grants (\$50,000,000)
- b. Renewable Energy and EIED FY25 Grant (\$5,000,000)
- c. Federal Energy Code and Benchmarking Grants (\$3,053,600)

33. Defendant Department of Health and Human Services is a principal department of the executive branch of state government. MCL 16.175. The Court of Claims may exercise personal jurisdiction over the department under Section 6419(1)(a) of the Revised Judicature Act, MCL 600.6419(1)(a).

34. Elizabeth Hertel is the Director of the Department of Health and Human Services. Ms. Hertel is sued in her official capacity. The Court of Claims may exercise personal

jurisdiction over Ms. Hertel under Section 6419(1)(a) of the Court of Claims Act, MCL 600.6419(1)(a).

35. Defendant Department of Health and Human Services is responsible for administering the following single-year line-items appropriations in FY 2025 that the SBO Director proposed to be designated as work project appropriations, which proposal was disapproved by the House Appropriations Committee pursuant to its statutory authority under MCL 18.1451a(3):

- a. SOS Network (\$3,000,000)
- b. LAHC - Healthy Communities Grant (\$2,000,000)
- c. MDHHS Information Technology Projects (\$18,000,000)
- d. Prenatal and Infant Support Program (\$18,489,200)
- e. Children's Campus Renovation (\$1,494,600)
- f. McLaren Greater Lansing Mobile Clinic (\$700,000)
- g. Native American Health Services (\$3,500,000)
- h. Community Impact Center (\$2,500,000)
- i. Local Food Infrastructure Grant (\$2,992,500)
- j. Nurse Workforce Development (\$4,000,000)
- k. Mental Health Services and Community Outreach (\$1,427,800)
- l. Healthy Michigan MCIR (\$553,500)
- m. Cranial Hair Prosthesis (\$56,600)
- n. FY 25 Drinking Water Declaration of Emergency (\$1,674,500)
- o. Firearm safety and violence prevention (\$1,800,000)
- p. Complex Medical Condition Center (\$16,900)
- q. FY25 Opioid Settlement Funds (\$7,067,200)

36. Defendant Department of State is a principal department of the executive branch of state government. MCL 16.125. The Court of Claims may exercise personal jurisdiction over the department under Section 6419(1)(a) of the Revised Judicature Act, MCL 600.6419(1)(a).

37. Jocelyn Benson is the Secretary of State and directs the Department of State. Ms. Benson is sued in her official capacity. The Court of Claims may exercise personal jurisdiction over Ms. Benson under Section 6419(1)(a) of the Court of Claims Act, MCL 600.6419(1)(a).

38. Defendant Department of State is responsible for administering the following single-year line-items appropriations in FY 2025 that the SBO Director proposed to be designated as work project appropriations, which proposal was disapproved by the House Appropriations Committee pursuant to its statutory authority under MCL 18.1451a(3):

- a. ADA Digital Compliance (\$750,000)
- b. Voting Equipment Refresh (\$7,200,000)
- c. Cybersecurity and Infrastructure Security (\$375,000)

39. Defendant Department of Transportation is a principal department of the executive branch of state government. MCL 16.450. The Court of Claims may exercise personal jurisdiction over the department under Section 6419(1)(a) of the Revised Judicature Act, MCL 600.6419(1)(a).

40. Bradley Wieferich is the Director of the Department of Transportation. Mr. Wieferich is sued in his official capacity. The Court of Claims may exercise personal jurisdiction over Mr. Wieferich under Section 6419(1)(a) of the Court of Claims Act, MCL 600.6419(1)(a).

41. Defendant Department of Transportation is responsible for administering the following single-year line-items appropriations in FY 2025 that the SBO Director proposed to be designated as work project appropriations, which proposal was disapproved by the House Appropriations Committee pursuant to its statutory authority under MCL 18.1451a(3):

- a. Passenger Transportation Services – Technology Enhancement (\$848,100)
- b. Service Initiatives Projects (2025) (\$4,131,900)
- c. School Zone Automated Enforcement Pilot Study (\$2,500,000)
- d. Work Zone Safety Cameras (\$2,940,000)
- e. 2030 Standard Specifications for Construction (\$2,293,700)

42. Defendant Department of Natural Resources is a principal department of the executive branch of state government. MCL 16.350. The Court of Claims may exercise personal jurisdiction over the department under Section 6419(1)(a) of the Revised Judicature Act, MCL 600.6419(1)(a).

43. Scott Bowen is the Director of the Department of Natural Resources. Mr. Bowen is sued in his official capacity. The Court of Claims may exercise personal jurisdiction over Mr. Bowen under Section 6419(1)(a) of the Court of Claims Act, MCL 600.6419(1)(a).

44. Defendant Department of Natural Resources is responsible for administering the following single-year line-items appropriations in FY 2025 that the SBO Director proposed to be designated as work project appropriations, which proposal was disapproved by the House Appropriations Committee pursuant to its statutory authority under MCL 18.1451a(3):

- a. Fisheries Habitat Improvement Grants (\$50,000)
- b. Nature Awaits Exhibit and Facility Upgrades (\$2,200,000)
- c. Interpretive Signage and Trail Improvements at State Parks (\$400,000)
- d. Report All Poaching Communications Center Relocation (\$100,000)
- e. Body-Worn Camera Implementation (\$400,000)
- f. Archaeological Services on DNR-Managed Land and Great Lakes Bottomlands (\$200,000)
- g. Visitor Center Exhibit and Facility Upgrades (\$200,000)

- h. Wildlife Building Demolitions and Hazardous Material Abatement (\$1,000,000)
- i. Fisheries Major Maintenance, Equipment, and Cormorant Management (\$1,600,000)

45. Defendant Michigan Strategic Fund is a public body corporate and politic and “an autonomous entity within the department of labor and economic opportunity.” MCL 125.2005. The Michigan Strategic Fund is considered a state department for jurisdictional purposes under Section 6419(7) of the Court of Claims Act, MCL 600.6419(7). The Court of Claims may exercise personal jurisdiction over the MSF under Section 6419(1)(a) of the Court of Claims Act, MCL 600.6419(1)(a).

46. Defendant Michigan Economic Development Corporation is a public body corporate created under section 28 of article VII of the state constitution of 1963 and the urban cooperation act of 1967, MCL 124.501 *et seq.* The Michigan Economic Development Corporation is considered a state department for jurisdictional purposes under Section 6419(7) of the Court of Claims Act, MCL 600.6419(7). The Court of Claims may exercise personal jurisdiction over the MEDC under Section 6419(1)(a) of the Court of Claims Act, MCL 600.6419(1)(a).

47. Quentin Messer is the Chief Executive Officer of the Michigan Economic Development Corporation. Mr. Messer is sued in his official capacity. The Court of Claims may exercise personal jurisdiction over Mr. Messer under Section 6419(1)(a) of the Court of Claims Act, MCL 600.6419(1)(a).

48. Defendant Michigan Strategic Fund and Defendant Michigan Economic Development Corporation are responsible for administering the following single-year line-items appropriations in FY 2025 that the SBO Director proposed to be designated as work project appropriations, which proposal was disapproved by the House Appropriations Committee pursuant to its statutory authority under MCL 18.1451a(3):

- a. Michigan Innovation Fund (\$11,244,000)
- b. Infrastructure Grants (\$63,478,800)

- c. Talent and Growth (\$16,362,000)
- d. Downtown Development (\$150,000)
- e. Agricultural Tourism Hub Redevelopment (\$2,000,000)
- f. COVID-19 - Community Development Block Grant - Federal CARES (\$10,942,700)

49. Defendant Michigan Gaming Control Board is considered a state department for jurisdictional purposes under Section 6419(7) of the Court of Claims Act, MCL 600.6419(7).

50. Henry Williams is the Executive Director of the Michigan Gaming Control Board. Mr. Williams is sued in his official capacity. The Court of Claims may exercise personal jurisdiction over Mr. Williams under Section 6419(1)(a) of the Court of Claims Act, MCL 600.6419(1)(a).

51. Defendant Michigan Gaming Control Board is responsible for administering the following single-year line-items appropriation in FY 2025 that the SBO Director proposed to be designated as work project appropriations, which proposal was disapproved by the House Appropriations Committee pursuant to its statutory authority under MCL 18.1451a(3):

- a. MGCB Application Portal (MAP) Continuation (\$2,967,600)

52. Defendant Bureau of State Lottery is considered a state department for jurisdictional purposes under Section 6419(7) of the Court of Claims Act, MCL 600.6419(7).

53. Joseph Froehlich is the Acting Commissioner of the Bureau of State Lottery. Mr. Froehlich is sued in his official capacity. The Court of Claims may exercise personal jurisdiction over Mr. Froehlich under Section 6419(1)(a) of the Court of Claims Act, MCL 600.6419(1)(a).

54. Defendant Bureau of State Lottery is responsible for administering the following single-year line-items appropriations in FY 2025 that the SBO Director proposed to be designated as work project appropriations, which proposal was disapproved by the House Appropriations Committee pursuant to its statutory authority under MCL 18.1451a(3):

- a. Lottery IT Replacement/Enhancement Projects (\$1,050,100)
- b. Lottery Innovation and Modernization (\$1,950,000)

55. The Court of Claims has “exclusive” jurisdiction to “hear and determine any claim or demand, statutory or constitutional,” or any demand for “equitable[] or declaratory relief ... against the state or any of its departments or officers.” MCL 600.6419(1)(a).

56. Because the House raises statutory claims, and seeks equitable and declaratory relief, against Defendants, this Court has jurisdiction to hear these claims.

57. This Court has jurisdiction to issue writs of mandamus against Defendant state officers under MCR 3.305(a)(1).

58. For the same reasons, venue is appropriate in this Court.

GENERAL ALLEGATIONS

The Statutory Appropriations Process

59. The legislative power of the State of Michigan is vested in a senate and a house of representatives, see Const. 1963, Art. IV, § 1, and it includes the power to appropriate public funds.

60. In pursuit of that legislative authority, the Legislature enacted the Management and Budget Act, MCL 18.1101, *et seq.*

61. Under the Act, “the legislature shall pass and present general appropriation bills for the upcoming fiscal year to the governor on or before July 1.” MCL 18.1365.

62. The Act mandates that, unless otherwise provided by law, “[a]t the close of the fiscal year, all appropriated funds that have not been expended or encumbered lapse to the fund from which they were appropriated.” MCL 18.1451(1).

63. Over 30 years ago, the Legislature enacted a limited exception to the automatic one-year sunset that would apply to “work project appropriation[s].” MCL 18.1451a (former MCL 18.1451).

64. A “work project appropriation” is defined as “a 1-time nonrecurring undertaking for the purpose of accomplishing an objective contained in specific line-item appropriation

for that purpose or any other specific line-item appropriation designated as a work project by law under [certain] criteria.” MCL 18.1404(6).

65. If an appropriation is designated as a “work project appropriation,” the standard one-year statutory sunset does not apply. Instead, the funds “continue[] to be available until completion of the work or 48 months after the last day of the fiscal year in which the appropriation was originally made, whichever comes first, then the remaining balance lapses to the state fund from which it was appropriated.” MCL 18.1451a(1).

66. A line-item appropriation may be designated as a “work project appropriation” in one of two ways. First, the Legislature may designate it as such in its general appropriations bill. See MCL 18.1404(6)

67. Second, for those line-items not designated by the Legislature as “work project appropriations” (and, thus, which are subject to the standard one-year sunset), the Director of the DTMB (or her designee, the SBO Director) may propose to the senate and house appropriations committees and the fiscal agencies that they be reclassified as “work project appropriations.” MCL 18.1451a(3).

68. The Director’s proposed designations may be “disapproved by either appropriations committee within 30 days after the date of notification and, if disapproved within that time, shall not be effective.” MCL 18.1451a(3).

The Present Dispute

69. On November 14, 2025, the Director of the State Budget Office sent a letter to members of the House and Senate Appropriations Committees proposing that \$2.7 billion in line-item appropriations for Fiscal Year 2025 be reclassified as “work project appropriations.” **Ex. A**, 11/14/25 Flood Letter.

70. On December 10, 2025, the House Appropriations Committee voted to disapprove \$644.9 million of the proposed work project appropriation reclassifications. **Ex. B**, 12/10/25 HAC Mtg. Mins. The affected line items and the executive department or agency

responsible for disbursing them are identified in Paragraphs 11-54 of this Verified Complaint. See also **Ex. C**, HFA Summary of Disapproved Proposed Work Projects.

71. Following the vote, state senator Sarah Anthony sent a letter request to Attorney General Dana Nessel, seeking her opinion on “[w]hether the provision in MCL 18.1451a(3), allowing either the Senate or House Appropriations committees to disapprove work projects designated by the State Budget Director, violates the Michigan Constitution?” **Ex. D**, Sen. Anthony Letter to Atty Gen.

72. On January 7, 2026, Attorney General Nessel issued a formal opinion answering Senator Anthony’s question. **Ex. E**, Atty Gen Op No 7328, issued Jan. 7, 2026. Attorney General Nessel opined that Subsection 451a(3) violates the Michigan Constitution in two ways. First, it “impermissibly allows a single legislative committee to exert ongoing control over the executive implementation of enacted laws[,]” in violation of the separation of powers. *Id.*, p 6. And second, it “circumvents the constitutional requirements of bicameralism and presentment.” *Id.*

73. Less than 45 minutes after Nessel publicly released her 29-page opinion, the Deputy Director of the State Budget Office wrote to all agency budget directors stating that the SBO “concur[s] with the opinion issued by the Attorney General.” **Ex. F**, 1/7/26 SBO Message.

74. The SBO Deputy Director also indicated that the SBO had already begun to act in reliance on the Attorney General’s opinion, stating, “Appropriation codes for new non-statutory work projects included in the Nov. 14 letter have been activated to allow departments to begin spending in FY 2026.” *Id.*

COUNT 1

VIOLATION OF THE MANAGEMENT AND BUDGET ACT

75. The House incorporates and realleges the preceding allegations by reference.

76. Under Subsection 451a(3) of the Management and Budget Act, the Director's authority to propose work project appropriations is subject to disapproval by senate or House Appropriations committee.

77. On November 14, 2025, the Director of State Budget Office proposed \$2.7 billion of line-item appropriations from the 2025 fiscal year be designated as work project appropriations, and on December 10, 2025, pursuant to its statutory authority under Subsection 451a(3), the house appropriation committee disapproved \$644.9 million of those proposed work project appropriation designations.

78. Under the terms of Subsection 451a(3), upon the House Appropriations committee's disapproval, the Director's proposal to designate those appropriations as work project appropriation was "not effective."

79. As a consequence, the unexpended and unencumbered balance of the \$644.9 million in line-item appropriations lapsed by operation of law to the funds from which they were appropriated, pursuant to Section 451(1) of the Management and Budget Act.

80. On January 7, 2026, the State Budget Office unequivocally declared that it considered the \$644.9 million in line-item appropriations "work project appropriations." Not only has it not transferred the line-item appropriations back to the funds from which they were appropriated, it has taken affirmative actions to *disburse* such funds in violation of the Management and Budget Act.

81. The State Budget Office's statements and actions are contrary to the plain and unambiguous language of the Management and Budget Act, which mandate that the line-item appropriations at issue lapse to the fund from which they were appropriated at the close of the 2025 fiscal year.

DECLARATORY JUDGMENT

82. The House incorporates and realleges the preceding allegations by reference.

83. Under *Lansing Sch Ed Ass'n v Lansing Bd of Ed*, 487 Mich 349, 372 (2010), “when- ever a litigant meets the requirements of MCR 2.605, it is sufficient to establish standing to seek a declaratory judgment.” *Id.*

84. MCR 2.605(A)(l) states that, “[i]n a case of actual controversy within its juris- diction, a Michigan court of record may declare the rights and other legal relations of an inter- ested party seeking a declaratory judgment.”

85. The House and Defendants have adverse interests and disagree sharply over (a) the constitutionality of the work project appropriation disapproval clause of Subsection 451a(3) of the Management and Budget Act and (b) whether the line-item appropriations at issue should lapse to the funds from which they were appropriated or should be available to be expended or encumbered by executive departments as an ongoing “work project appropri- ations.” Relying exclusively on Attorney General Opinion No. 7328, Defendants assert that the work project appropriation disapproval clause of Subsection 451a(3) is unconstitutional and that the State Budget Office Director’s purported designation of the appropriations as “work projects” is therefore controlling. The House strongly disagrees, contending that the work project appropriation disapproval clause of Subsection 451a(3) is not unconstitutional and, if it is, that the Director’s purported attempt to reclassify one-year appropriations as multi- year appropriations under the remainder of Subsection 451a(3) is also unconstitutional for the same reasons cited by the Attorney General.

86. The House has a significant, concrete interest in the outcome of this claim that would be affected differently from the general public.

87. An actual, present legal controversy exists between the House and the Defend- ants.

88. A judicial declaration resolving the present legal controversy is necessary to guide the parties’ future conduct to protect their legal rights.

89. The House therefore requests a declaratory judgment under MCR 2.605 that the work project appropriation disapproval clause of MCL 18.1451a(3) is constitutional and that the line-item appropriations disapproved of by the House Appropriations Committee on December 10, 2025 are not “work project appropriations” pursuant to MCL 18.1451a(3) and, therefore, have lapsed by operation of law to the funds from which they were appropriated.

WRIT OF MANDAMUS

90. The House incorporates and realleges the preceding allegations by reference.

91. The House has a clear constitutional and statutory right to appropriate funds that are available in state funds from prior fiscal years.

92. Defendants have a clear legal duty to transfer the unexpended or unencumbered portion of the line-item appropriations disapproved of by the House Appropriations Committee as “work project appropriations” back to the fund from which they were appropriated and the close of the fiscal year. MCL 18.1451(1).

93. Defendants have violated that clear legal duty by taking affirmative actions to the contrary and making the funds at issue available to be expended or encumbered by other executive departments and agencies.

94. The House has no adequate remedy at law.

95. The House therefore seeks a writ of mandamus to compel Defendants to perform their clear ministerial duties to transfer the unexpended or unencumbered portion of the line-item appropriations disapproved of by the House Appropriations Committee as “work project appropriations” back to the fund from which they were appropriated.

PRAYER FOR RELIEF

The House respectfully requests that this Court:

A. Declare and adjudge that:

1. The work project appropriation disapproval clause of MCL 18.1451a(3) does not violate the Separation of Powers Clause of the Michigan Constitution of 1963, Article 3, § 2.

2. The work project appropriation disapproval clause of MCL 18.1451a(3) does not violate the Bicameralism and Presentment Clause of the Michigan Constitution of 1963, Article 4, § 33.
3. The line-item appropriations disapproved of by the House Appropriations Committee on December 10, 2025 are not “work project appropriations” pursuant to MCL 18.1451a(3) and, therefore, have lapsed by operation of law to the funds from which they were appropriated.
4. Alternatively, if the work project appropriation disapproval clause of MCL 18.1451a(3) does violate either the Bicameralism and Presentment Clause or the Separation of Powers Clause of the Michigan Constitution of 1963, then (a) that clause cannot be severed from the remainder of Subsection 451a(3) and (b) Subsection 451a(2) and Subsection 451a(3) are also unconstitutional because they permit the exercise of core legislative powers by executive officials.

B. Issue a writ of mandamus compelling Defendants to perform their clear ministerial duties under MCL 18.1451 and MCL 18.1451a(3) to transfer the unexpended or unencumbered portion of the line-item appropriations disapproved of by the House Appropriations Committee as “work project appropriations” on December 10, 2025, back to the fund from which they were appropriated.

C. Grant such other relief as this Court deems just and proper.

Respectfully submitted,

KIENBAUM HARDY VIVIANO PELTON
& FORREST, P.L.C.

BURSCH LAW PLLC

By: /s/ Sean T.H. Dutton

John J. Bursch (P57679)
Co-Counsel for Plaintiff
9339 Cherry Valley Ave. SE, #78
Caledonia, MI 49316
(616) 450-4235
jbursch@burschlaw.com

Sean T.H. Dutton (P77515)
David A. Porter (P76785)
Co-Counsel for Plaintiff
280 N. Old Woodward Ave., Ste. 400
Birmingham, MI 48009
(248) 645-0000
sdutton@khvpf.com
dporter@khvpf.com

Dated: January 9, 2026

VERIFICATION

In my capacity as General Counsel to the Michigan House of Representatives, I declare under the penalties of perjury that the allegations pleaded in this complaint are true to the best of my information, knowledge, and belief, and that of the Michigan House of Representatives.

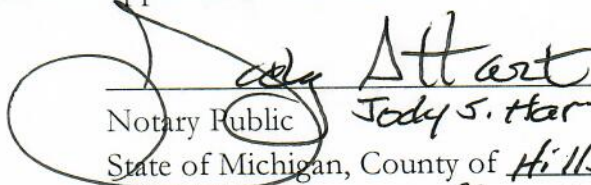
Executed this 9th day of January, 2026.



Andrew Fink

STATE OF MICHIGAN)
COUNTY OF Hillsdale)

Subscribed to and sworn to (or affirmed) before me on this 9th day of January, 2025, by Andrew Fink, who is personally known to me or who proved to me on the basis of satisfactory evidence to be the person who appeared before me.



Notary Public

State of Michigan, County of Hillsdale

My commission expires March 17, 2026

Acting in the County of Hillsdale

JODY S. HART
Notary Public, Hillsdale County, MI
My Comm. Expires March 17, 2026

EXHIBIT A



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
STATE BUDGET OFFICE
LANSING

JENNIFER L. FLOOD
DIRECTOR

November 14, 2025

The Honorable Sarah Anthony, Chair
Senate Appropriations Committee
Michigan State Senate
State Capitol
Lansing, Michigan 48909

The Honorable Ann Bollin, Chair
House Appropriations Committee
Michigan House of Representatives
State Capitol
Lansing, Michigan 48909

Dear Legislators:

As part of the book closing process for fiscal year 2025, I am hereby transmitting two work project lists for your information and review.

1. The first list summarizes appropriation year (AY) 2025 line item appropriations which I recommend be designated as work projects under the provisions of Section 451a(3) of the Management and Budget Act, 1984 PA 431, MCL 18.1451a (i.e., non-statutory work projects). These designations may be disapproved by either Appropriations Committee within 30 days after the date of notification and, if disapproved within that time period, shall not be effective.
2. The second list summarizes specific AY 2025 line item appropriations designated as work projects by law (i.e., statutory work projects).

This report can be found under "Spending and Revenue Reports" at <http://www.michigan.gov/budget>. If you have any questions regarding this request, please contact my office at (517) 335-3420.

Sincerely,

Jennifer L. Flood
State Budget Director

Attachment

Senator Sarah Anthony
Representative Ann Bollin
Page 2
November 14, 2025

cc: Winnie Brinks, Senate Majority Leader
Matt Hall, Speaker of the House
Aric Nesbitt, Senate Minority Leader
Ranjeev Puri, House Minority Leader
Senate Appropriations Committee
House Appropriations Committee
Senate Fiscal Agency
House Fiscal Agency

Departments
JoAnne Huls, Chief of Staff
Tricia Foster, Chief Operating Officer
Zack Pohl, Deputy Chief of Staff
Kara Cook, Director of Legislative Affairs
Kyle Guerrant, Deputy State Budget Director
Heather Boyd, Office of Financial Management
Internal State Budget Office

Budget Fiscal Year 2025

Work Projects Recommended for Approval Under the Provisions of MCL 18.1451a (3)

Note: Work Project amounts are estimates.

Actual amounts may vary due to final book-closing entries.

Fiscal Year 2025 Work Projects - Not In Statute

Agriculture and Rural Development

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount
Highly Pathogenic Avian Influenza Response Support	2025	State general fund/general purpose	\$805,000
Food and Agriculture Supply Chain Investments	2025	State general fund/general purpose	\$675,000
Michigan Animal Agriculture Alliance	2025	State general fund/general purpose	\$1,500,000

Attorney General

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount
Sexual Assault Law Enforcement	2025	State general fund/general purpose	\$821,800
Public Safety Initiative	2025	State general fund/general purpose	\$888,300
Operation Survivor Justice	2025	State general fund/general purpose	\$500,000
MSHDA Fraud Recovery	2025	IDG from Michigan state housing development authority	\$700,000
MCOLLES Training Costs	2025	IDG from MDSP, Michigan justice training fund	\$62,000
		State general fund/general purpose	\$45,000
Human Trafficking	2025	State general fund/general purpose	\$662,300

Fiscal Year 2025 Work Projects - Not In Statute

Community Colleges

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount
COCL - Reconnect Career and Education Navigators	2025	School aid fund	\$1,150,000
COCL - MCCA Local Heroes	2025	State general fund/general purpose	\$250,000
COCL - KVCC Internet Accessibility	2025	School aid fund	\$350,000

Corrections

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount
Facility Physical Plant and Infrastructure Projects 2025	2025	State general fund/general purpose	\$45,000,000
Education Improvements	2025	State general fund/general purpose	\$2,100,000
Food Tech Physical Plant & Equipment	2025	State general fund/general purpose	\$320,000
Food Service Physical Plant and Equipment	2025	State general fund/general purpose	\$4,200,000
Facility Safety Projects	2025	State general fund/general purpose	\$10,000,000

Education

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount
Sec. 703 - Indigenous Tribal History Prof Learning Project	2025	State general fund/general purpose	\$750,000
Sec. 1100 - Charter School Transparency Database	2025	State general fund/general purpose	\$132,700
MSD Trust Fund Improvements	2025	Gifts, bequests, and donations	\$1,500,000

Fiscal Year 2025 Work Projects - Not In Statute

Environment, Great Lakes, and Energy

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount
Security, Privacy, and ADA Compliance Mapping Projects	2025	Air emissions fees	\$49,700
		Aquatic nuisance control fund	\$3,400
		Campground fund	\$900
		Cleanup and redevelopment fund	\$137,400
		Coal ash care fund	\$900
		Electronic waste recycling fund	\$800
		Environmental pollution prevention fund	\$29,900
		Fees and collections	\$113,900
		Financial instruments	\$209,000
		Great Lakes protection fund	\$900
		Groundwater discharge permit fees	\$8,000
		IDG from MDOT, Michigan transportation fund	\$4,800
		IDG from MDSP	\$4,600
		Laboratory services fees	\$33,900
		Land and water permit fees	\$10,900
		Medical waste emergency response fund	\$800
		Mineral well regulatory fee revenue	\$400
		Nonferrous metallic mineral surveillance	\$1,000
		NPDES fees	\$18,700
		Oil and gas regulatory fund	\$25,100

Fiscal Year 2025 Work Projects - Not In Statute

Environment, Great Lakes, and Energy

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount
Security, Privacy, and ADA Compliance Mapping Projects		Orphan well fund	\$4,200
		Public swimming pool fund	\$1,100
		Public water supply fees	\$20,200
		Refined petroleum fund	\$172,100
		Renew Michigan fund	\$234,900
		Scrap tire regulatory fund	\$10,000
		Septage waste program fund	\$1,300
		Sewage sludge land application fee	\$3,500
		Soil erosion and sedimentation control training fund	\$200
		Solid waste management fund, staff account	\$43,000
		State general fund/general purpose	\$2,804,700
		Stormwater permit fees	\$9,300
		Technologically enhanced naturally occurring radioactive material	\$1,500
		Underground storage tank cleanup fund	\$12,800
		Wastewater operator training fees	\$2,200
		Water quality protection fund	\$400
Huron-to-Erie Corridor Drinking Water Monitoring Program		Water use reporting fees	\$800
	2025	State general fund/general purpose	\$1,500,000
	2025	State general fund/general purpose	\$13,438,200
	2025	Infrastructure investment and jobs act fund	\$270,000,000

Fiscal Year 2025 Work Projects - Not In Statute

Environment, Great Lakes, and Energy

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount
Wetlands Mapping	2025	State general fund/general purpose	\$1,000,000
Great Lakes Protection	2025	Great Lakes protection fund	\$250,000
Detroit Areas of Concern	2025	Federal funds	\$7,561,800
AmeriCorps	2025	Federal funds	\$640,000
		State general fund/general purpose	\$156,800
Private Well Grant Grayling	2025	Federal funds	\$1,454,900
Watershed Council Grants	2025	State general fund/general purpose	\$600,000
Orphan Well Matching Grant Phase 2	2025	Infrastructure investment and jobs act fund	\$5,000,000
		State general fund/general purpose	\$5,000,000
Lake Michigan Circuit - Phase I	2025	Energy efficiency and renewable energy revolving loan fund	\$325,000
Michigan Energy Academy	2025	Inflation reduction act	\$1,980,000
Local Community Grants	2025	Inflation reduction act	\$129,104,400
Clean Michigan Initiative - Brownfields	2025	Clean Michigan initiative, response activities	\$15,000,000
Asbestos Emission & Inspection Program	2025	Asbestos inspection fund	\$2,000,000

Fiscal Year 2025 Work Projects - Not In Statute

Gaming Control Board

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount
MGCB Application Portal (MAP) Continuation	2025	Fantasy contest fund	\$407,100
		Internet gaming fund	\$1,707,000
		Internet sports betting fund	\$853,500

Health and Human Services

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount
SOS Network	2025	State general fund/general purpose	\$3,000,000
Behavioral Health Prevention & Treatment Pilot	2025	State general fund/general purpose	\$3,000,000
Perinatal Support Services	2025	State general fund/general purpose	\$3,733,200
LAHC - Healthy Communities Grant	2025	State general fund/general purpose	\$2,000,000
MDHHS Information Technology Projects	2025	Capped federal revenues	\$1,500,000
		Federal funds	\$10,000,000
		Social security act, temporary assistance for needy families	\$1,500,000
		State general fund/general purpose	\$5,000,000
Suicide Loss Survivor Program	2025	State general fund/general purpose	\$73,300
FY25 One-time Opioid Settlement Funds	2025	Michigan opioid healing and recovery	\$14,716,400
Ground Emergency Medical Transport	2025	State general fund/general purpose	\$1,000,100
Prenatal and Infant Support Program	2025	Social security act, temporary assistance for needy families	\$18,489,200
Firefighter Health Care	2025	State general fund/general purpose	\$3,500,000

Fiscal Year 2025 Work Projects - Not In Statute

Health and Human Services

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount
Community Mental Health Data Platform	2025	State general fund/general purpose	\$430,600
Juvenile Justice Infrastructure Pool	2025	State general fund/general purpose	\$3,462,100
Kinship and the Bridge	2025	State general fund/general purpose	\$641,200
Modified Implementation Sustainability and Exit Plan	2025	State general fund/general purpose	\$9,641,800
Nonprofit Mental Health Clinics	2025	State general fund/general purpose	\$26,700
Michigan Crisis and Access Line (MiCAL)	2025	Federal funds	\$300,000
Children's Campus Renovation	2025	State general fund/general purpose	\$1,900,000
ALS Services	2025	State general fund/general purpose	\$1,494,600
Medically Underserved Area Services	2025	State general fund/general purpose	\$466,000
Behavioral Health Initiative - Altarum	2025	State general fund/general purpose	\$547,000
Hospice Caregiver Support Center	2025	State general fund/general purpose	\$974,500
AIDS Prevention Testing and Care Programs Support	2025	State general fund/general purpose	\$199,500
FY2025 Sexually Transmitted Infection Program Support	2025	Michigan health initiative fund	\$172,000
EMS/Trauma/Stroke/STEMI	2025	Michigan health initiative fund	\$577,500
Crime Victim Rights Sustaining Grants	2025	State general fund/general purpose	\$1,000,000
Domestic Violence, Sexual Assault, and Human Trafficking Supports	2025	State general fund/general purpose	\$6,164,300
OIG Combined Case Management System	2025	State general fund/general purpose	\$199,900
	2025	Federal funds	\$1,000,000
McLaren Greater Lansing Mobile Clinic	2025	State general fund/general purpose	\$1,000,000
	2025	State general fund/general purpose	\$700,000

Fiscal Year 2025 Work Projects - Not In Statute

Health and Human Services

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount
Occupancy Projects	2025	Capped federal revenues	\$300,000
		Federal funds	\$500,000
		Social security act, temporary assistance for needy families	\$300,000
		State general fund/general purpose	\$500,000
Behavioral Health Services	2025	State general fund/general purpose	\$3,500,000
Housing and Childcare Project	2025	State general fund/general purpose	\$2,198,000
Critical Access Hospital Facility and Equipment	2025	State general fund/general purpose	\$345,200
Native American Health Services	2025	State general fund/general purpose	\$3,500,000
Community Impact Center	2025	State general fund/general purpose	\$2,500,000
Tribal Homeless Shelter Operations	2025	State general fund/general purpose	\$500,000
Local Food Infrastructure Grant	2025	State general fund/general purpose	\$2,992,500
Nurse Workforce Development	2025	State general fund/general purpose	\$4,000,000
Mental Health Services and Community Outreach	2025	State general fund/general purpose	\$1,427,800
CCBHC Spatial Analysis	2025	State general fund/general purpose	\$244,000
Psychiatric Hospital Special Maintenance Projects - FY25	2025	State general fund/general purpose	\$5,000,000
Healthy Michigan MCIR	2025	Healthy Michigan fund	\$553,500
Emerging Public Health Threats	2025	State general fund/general purpose	\$1,245,800
Cranial Hair Prosthesis	2025	State general fund/general purpose	\$56,600
Community Violence General Fund Work Project	2025	State general fund/general purpose	\$1,218,100
FY25 Drinking Water Declaration of Emergency	2025	State general fund/general purpose	\$1,674,500

Fiscal Year 2025 Work Projects - Not In Statute

Health and Human Services

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount
Firearm safety and violence prevention	2025	State general fund/general purpose	\$1,800,000
Fitness and Wellness Programming	2025	State general fund/general purpose	\$47,200
MiCSES Modernization Planning	2025	Capped federal revenues	\$10,566,500
Complex Medical Condition Center	2025	State general fund/general purpose	\$16,900
Patient-centered Medical Home	2025	State general fund/general purpose	\$1,000,000
Lead Exposure Response - Benton Harbor	2025	State general fund/general purpose	\$1,690,200
Juvenile Justice Reform	2025	State general fund/general purpose	\$4,083,700
FY25 Opioid Settlement Funds	2025	Michigan opioid healing and recovery	\$7,067,200
FY25 MI Kids Now Student Loan Forgiveness	2025	State general fund/general purpose	\$3,000,400
Multicultural Integration FY25	2025	State general fund/general purpose	\$4,877,300
Addiction Workforce Medicine Curriculum	2025	State general fund/general purpose	\$1,218,200

Fiscal Year 2025 Work Projects - Not In Statute

Insurance and Financial Services

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount
IT Legacy Modernization - 2025	2025	Captive insurance regulatory and supervision fund	\$44,700
		Consumer finance fees	\$361,600
		Continuing education fund	\$30,000
		Credit union regulatory fund	\$844,100
		Deferred presentment service transaction fees	\$156,000
		Insurance bureau fund	\$2,495,400
		Insurance licensing and regulation fees	\$1,748,500
		MBLSLA fund	\$756,100
		State bank regulatory fund	\$557,300

Fiscal Year 2025 Work Projects - Not In Statute

Labor and Economic Opportunity

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount
Office of Rural Prosperity Grants	2025	State general fund/general purpose	\$2,091,600
Office of Future Mobility Electrification	2025	State general fund/general purpose	\$2,000,000
Employment Relations	2025	Securities fees	\$795,800
Community Enhancement Grants	2025	State general fund/general purpose	\$102,611,500
Community Museum Grants	2025	State general fund/general purpose	\$15,779,700
Housing Pilot Program	2025	Private funds	\$300,000
		State general fund/general purpose	\$500,000
Symphony Grants	2025	State general fund/general purpose	\$1,923,100
Going Pro	2025	Contingent fund, penalty and interest account	\$9,540,800
		State general fund/general purpose	\$45,209,200
Talent and Growth	2025	State general fund/general purpose	\$12,859,200
High School Equivalency to School	2025	State general fund/general purpose	\$250,000
Bureau of Services for Blind Persons Gilmore Grant	2025	Private funds	\$500,000
First Responder Presumed Coverage Fund	2025	First responder presumed coverage fund	\$2,500,000
Michigan Rehabilitation Services Federal	2025	DED, vocational rehabilitation and independent living	\$35,000,000
Michigan Rehabilitation Services Federal - Career Development	2025	DED, vocational rehabilitation and independent living	\$9,467,300
Michigan Works! Skills Scholarships	2025	State general fund/general purpose	\$1,000,000
Office of Global Michigan Language Access	2025	State general fund/general purpose	\$308,000
Office of Global Michigan Regional Community Collaboratives	2025	State general fund/general purpose	\$1,000,000
COVID-19 - Unemployment Insurance Agency FEMA Repayment Lost Wage Assistance Program	2025	State general fund/general purpose	\$5,570,300

Fiscal Year 2025 Work Projects - Not In Statute

Legislative Services Bureau

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount
Legislative Corrections Ombudsman	2025	State general fund/general purpose	\$135,800
Michigan Veterans Facility Ombudsman	2025	State general fund/general purpose	\$368,600
National Association Dues	2025	State general fund/general purpose	\$1,000
Worker's Compensation	2025	State general fund/general purpose	\$177,100
Legislative Council Services	2025	State general fund/general purpose	\$8,946,800
Tribal legislative liaison	2025	State general fund/general purpose	\$430,000

Licensing and Regulatory Affairs

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount
Indigent Defense Commission Grants	2025	State general fund/general purpose	\$50,000,000
Renewable Energy and EIED FY25 Grant	2025	State general fund/general purpose	\$5,000,000
Michigan Online Interpreter System Replacement	2025	Corporation fees	\$330,000
Federal Energy Code and Benchmarking Grants	2025	DOE-OEERE, multiple grants	\$3,053,600
Continuity of Operations	2025	State general fund/general purpose	\$1,715,000

Fiscal Year 2025 Work Projects - Not In Statute

Lifelong Education, Advancement, and Potential

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount
FY25 TriShare	2025	State general fund/general purpose	\$3,000,000
Early Education Project Management and Implementation Support for Coordinated Resource and Referral	2025	Federal funds	\$180,000

Lottery

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount
Lottery IT Replacement/Enhancement Projects	2025	State lottery fund	\$1,050,100
Lottery Innovation and Modernization to increase efficiencies and revenues that will impact the School Aid Fund	2025	State lottery fund	\$1,950,000

Michigan State Housing Development Authority

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount
Housing Readiness Incentive Grant Program	2025	GF/GP transfer to Michigan State Housing Development Authority	\$2,325,000

Fiscal Year 2025 Work Projects - Not In Statute

Michigan Strategic Fund

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount
Business Attraction and Community Revitalization	2025	21st century jobs trust fund	\$93,705,600
Entrepreneurship Eco-System	2025	21st century jobs trust fund	\$13,181,300
MSF Strategic Outreach and Attraction Reserve Fund	2025	Strategic outreach and attraction reserve fund transfer to Michigan strategic fund	\$247,700,000
Michigan Defense Center Program	2025	GF/GP transfer to Michigan Strategic Fund - component unit	\$4,157,200
Michigan Innovation Fund	2025	21st century jobs trust fund	\$11,244,000
Infrastructure Grants	2025	GF/GP transfer to Michigan Strategic Fund - component unit	\$63,478,800
Talent and Growth	2025	GF/GP transfer to Michigan Strategic Fund - component unit	\$16,362,000
Pure Michigan	2025	GF/GP transfer to Michigan Strategic Fund - component unit	\$5,198,400
Downtown Development	2025	GF/GP transfer to Michigan Strategic Fund - component unit	\$150,000
Agricultural Tourism Hub Redevelopment	2025	GF/GP transfer to Michigan Strategic Fund - component unit	\$2,000,000
COVID-19 - Community Development Block Grant - Federal CARES Act	2025	HUD-CPD, community development block grant	\$10,942,700

Military and Veterans Affairs

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount
Camp Grayling Logistics Facility	2025	State general fund/general purpose	\$2,600,000

Fiscal Year 2025 Work Projects - Not In Statute

Natural Resources

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount
Fisheries Habitat Improvement Grants	2025	Game and fish protection fund	\$50,000
Nature Awaits Exhibit and Facility Upgrades	2025	State general fund/general purpose	\$2,200,000
Interpretive Signage and Trail Improvements at State Parks	2025	Park improvement fund	\$400,000
Shooting Range Development, Enhancement, and Restoration	2025	Game and fish protection fund	\$400,000
Report All Poaching Communications Center Relocation	2025	Game and fish protection fund	\$50,000
Body-Worn Camera Implementation	2025	State general fund/general purpose	\$50,000
Archaeological Services on DNR-Managed Land and Great Lakes Bottomlands	2025	State general fund/general purpose	\$400,000
Visitor Center Exhibit and Facility Upgrades	2025	Park improvement fund	\$200,000
Wildlife Building Demolitions and Hazardous Material Abatement	2025	Game and fish protection fund	\$1,000,000
Fisheries Major Maintenance, Equipment, and Cormorant Management	2025	Game and fish protection fund	\$1,600,000

Office of the Auditor General

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount
Technology Upgrades	2025	State general fund/general purpose	\$950,000
Security Assessment and Upgrades	2025	State general fund/general purpose	\$600,000
Environmental and Facility Upgrades	2025	State general fund/general purpose	\$500,000

Fiscal Year 2025 Work Projects - Not In Statute

School Aid

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount
Sec. 27g - Talent Together Coalition	2025	School aid fund	\$12,500,000
Sec. 31j - 10 Cents a Meal for Michigan's Kids and Farms	2025	School aid fund	\$1,478,000
		State general fund/general purpose	\$161,000
Sec. 27k - Student Loan Payments to Districts	2025	School aid fund	\$24,400,000
Sec. 11s - Drinking Water Declaration of Emergency	2025	School aid fund	\$5,000,000
		State general fund/general purpose	\$1,780,000
Sec. 55 - Conductive Learning Center	2025	State general fund/general purpose	\$500,000
Sec. 97h - Firearms Storage Tip Line	2025	School aid fund	\$1,000,000
Sec. 33 - MI Creative Potential	2025	School aid fund	\$2,500,000

State

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount
ADA Digital Compliance	2025	State general fund/general purpose	\$750,000
Voting Equipment Refresh	2025	Election administration support fund	\$7,200,000
Cybersecurity and Infrastructure Security	2025	Transportation administration collection fund	\$375,000

Fiscal Year 2025 Work Projects - Not In Statute

State Capitol Historic Site

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount
State Capitol Historic Site	2025	Legislative parking fund	\$54,500
		State capitol building special events	\$247,800
		State general fund/general purpose	\$400,000

State Police

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount
Aviation Maintenance (FY25)	2025	State general fund/general purpose	\$1,000,000
Cold Case Investigations	2025	State general fund/general purpose	\$200,000
CVED State Trunkline Fund (FY25)	2025	IDG from MDOT, state trunkline fund	\$6,200,000
Forensic Science Infrastructure Projects	2025	State general fund/general purpose	\$2,600,000
EMHSD Federal Disasters	2025	DHS	\$800,000,000
Facilities Improvement Projects	2025	State general fund/general purpose	\$5,000,000
Disaster and Emergency Contingency Fund Deposit	2025	State general fund/general purpose	\$10,000,000

Fiscal Year 2025 Work Projects - Not In Statute

Technology, Management and Budget

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount
Office of State Employer (OSE) - Staff Development and Labor Relations Training	2025	State general fund/general purpose	\$180,000
Cyber Security Service Protections	2025	State general fund/general purpose	\$10,100,000
Enterprise Language Accessibility	2025	State general fund/general purpose	\$1,460,000
Michigan Public Safety Communication System	2025	State general fund/general purpose	\$3,000,000
Office of Performance Management (OPM) - Customer Satisfaction Survey	2025	State general fund/general purpose	\$130,000
Building Operations Division (BOD) - Feminine Hygiene	2025	State general fund/general purpose	\$1,214,500
Enterprisewide Information Technology Investment Projects	2025	State general fund/general purpose	\$31,500,000
State Archives Microfilm Reformatting Project	2025	State general fund/general purpose	\$100,000
Office of Retirement Services (ORS) - Clarety Information Technology Legacy Modernization Project	2025	Pension trust funds	\$11,700,000
Make it in Michigan Competitiveness Fund	2025	Make it in Michigan competitiveness fund	\$159,310,300
Real Estate Division - Space Utilization	2025	State general fund/general purpose	\$1,400,000
Resource Planning and Special Projects	2025	State general fund/general purpose	\$2,900,000

Fiscal Year 2025 Work Projects - Not In Statute

Transportation

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount
State Trunkline Ops - One Time Work Authorizations (2025)	2025	State trunkline fund	\$6,000,000
Aeronautics One-time Air Service/Airport Revitalization	2025	State general fund/general purpose	\$1,825,900
Aeronautics Air Service Program	2025	State aeronautics fund	\$50,000
Hillsdale Bridge Replacement	2025	Comprehensive transportation fund	\$8,000,000
Passenger Transportation Services - Technology Enhancement	2025	Comprehensive transportation fund	\$848,100
Ferry Service Critical Enhancements and Infrastructure	2025	Comprehensive transportation fund	\$1,993,300
Service Initiatives Projects (2025)	2025	Comprehensive transportation fund	\$4,131,900
School Zone Automated Enforcement Pilot Study	2025	State general fund/general purpose	\$2,500,000
Work Zone Safety Cameras	2025	State trunkline fund	\$2,940,000
TAMC Statewide Asset Management Strategy Development	2025	IDT from MTF to STF, asset management council	\$131,300
2030 Standard Specifications for Construction	2025	State trunkline fund	\$2,293,700
Welcome Center Facility Maintenance & Repair Projects	2025	State trunkline fund	\$400,000

Fiscal Year 2025 Work Projects - Not In Statute

Treasury

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount
Tribal Litigation Fund	2025	Delinquent tax collection revenue	\$38,900
Regional and Local Technical Assistance Assistance for Communities and Schools in Potential Distress Local Prosecutor Support Grants		State general fund/general purpose	\$414,600
	2025	State general fund/general purpose	\$1,250,000
	2025	State general fund/general purpose	\$1,800,000
	2025	State general fund/general purpose	\$16,750,000
Additional Local Prosecutor Support	2025	State general fund/general purpose	\$250,000
12th District Court Security	2025	State general fund/general purpose	\$961,100
38th District Court Project	2025	State general fund/general purpose	\$1,000,000
Business and Special Taxes System Replacement	2025	Delinquent tax collection revenue	\$2,100,000
		State general fund/general purpose	\$1,225,000
Federal and State Legislative Changes	2025	Delinquent tax collection revenue	\$943,200
		State general fund/general purpose	\$1,557,100
Elective Pay Ambassador Program	2025	State general fund/general purpose	\$250,000
ELITES Project	2025	Delinquent tax collection revenue	\$2,375,200
		State general fund/general purpose	\$26,300
Revenue Sharing Web Application IT Project	2025	State general fund/general purpose	\$530,000

Fiscal Year 2025 Work Projects - Not In Statute

Universities

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount
UNIV - Western Mich Project Clean	2025	State general fund/general purpose	\$375,000
UNIV - Education Performance Study	2025	State general fund/general purpose	\$179,500
UNIV - City of Kalamazoo	2025	State general fund/general purpose	\$70,000

Budget Fiscal Year 2025

Appropriations Designated as Work Projects by Law

Note: Work Project amounts are estimates.

Actual amounts may vary due to final book-closing entries.

Fiscal Year 2025 Work Projects - In Statute

Agriculture and Rural Development

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount	Public Act and Boilerplate Section
Underserved-Owned Food and Agriculture Ventures	2025	State general fund/general purpose	\$500,000	PA 121 of 2024, Article 1, Section 901(2)
Food and Agriculture Investment Projects	2025	State general fund/general purpose	\$1,100,000	PA 121 of 2024, Article 1, Section 701(6)
Emerging Contaminants	2025	State general fund/general purpose	\$830,000	PA 121 of 2024, Article 1, Section 303(2)

Corrections

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount	Public Act and Boilerplate Section
Thumb Education Center	2025	Program and special equipment fund	\$2,800,000	PA 121 of 2024, Article 2, Section 805
Breast Milk Program	2025	State general fund/general purpose	\$150,000	PA 121 of 2024, Article 2, Section 801

Fiscal Year 2025 Work Projects - In Statute

Education

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount	Public Act and Boilerplate Section
Sec. 1102 - Community Health Worker CTE Program	2025	State general fund/general purpose	\$240,000	PA 121 of 2024, Article 3, Section 1102(6)
Sec. 1101 - Mental Health Training	2025	State general fund/general purpose	\$275,000	PA 121 of 2024, Article 3, Section 1101(3)
Sec. 1103 - School Infrastructure and Consolidation Admin	2025	State general fund/general purpose	\$75,000	PA 121 of 2024, Article 3, Section 1103(2)
Sec. 1104 - Michigan Test for Teacher Certification	2025	State general fund/general purpose	\$335,000	PA 121 of 2024, Article 3, Section 1104(3)

Environment, Great Lakes, and Energy

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount	Public Act and Boilerplate Section
Renewing Michigan's Environment	2025	Renew Michigan fund	\$50,267,800	PA 121 of 2024, Article 4, Section 801
Drinking Water Infrastructure Lead Line Replacement	2025	State general fund/general purpose	\$35,300,000	PA 121 of 2024, Article 4, Section 1002
Water infrastructure Initiative Stormwater Project	2025	State general fund/general purpose	\$10,000,000	PA 121 of 2024, Article 4, Section 1007
Microplastics	2025	State general fund/general purpose	\$2,000,000	PA 121 of 2024, Article 4, Section 1005
Coastal Zone Management	2025	Inflation reduction act	\$875,000	PA 22 of 2026, Article 16, Section 305
		Infrastructure investment and jobs act fund	\$425,000	

Fiscal Year 2025 Work Projects - In Statute

Environment, Great Lakes, and Energy

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount	Public Act and Boilerplate Section
IRA - Dam Safety	2025	Inflation reduction act	\$375,000	PA 22 of 2026, Article 16, Section 306
Great Lakes Remedial Action Plan Grants	2025	Infrastructure investment and jobs act fund	\$1,080,000	PA 22 of 2026, Article 16, Section 302
America the Beautiful	2025	Infrastructure investment and jobs act fund	\$5,000,000	PA 22 of 2026, Article 16, Section 304
Water Use Advisory Council 2022 Recommendations	2025	State general fund/general purpose	\$1,200,000	PA 121 of 2024, Article 4, Section 1009
Brownfield grants	2025	Brownfield development fund	\$1,090,000	PA 121 of 2024, Article 4, Section 302
Refined petroleum cleanup program	2025	Refined petroleum fund	\$15,000,000	PA 121 of 2024, Article 4, Section 302
Emergency cleanup actions	2025	Cleanup and redevelopment fund	\$2,000,000	PA 121 of 2024, Article 4, Section 302
Environmental cleanup and redevelopment program	2025	Cleanup and redevelopment fund	\$27,600,000	PA 121 of 2024, Article 4, Section 302
Environmental cleanup support	2025	Environmental response fund	\$1,442,100	PA 121 of 2024, Article 4, Section 302
Lake Michigan Circuit - Phase II	2025	Energy efficiency and renewable energy revolving loan fund	\$5,000,000	PA 22 of 2026, Article 16, Section 307
Michigan Fuel & Charging Infrastructure Program	2025	State general fund/general purpose	\$30,000,000	PA 121 of 2024, Article 4, Section 1001
Butterworth Solar Project	2025	State general fund/general purpose	\$3,000,000	PA 121 of 2024, Article 4, Section 1006
Dowagiac Lead Service Lines Grant	2025	Federal funds	\$826,000	PA 22 of 2026, Article 16, Section 301

Fiscal Year 2025 Work Projects - In Statute

Environment, Great Lakes, and Energy

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount	Public Act and Boilerplate Section
Great Lakes Restoration Initiative North Branch Au Sable River	2025	Federal funds	\$5,500,000	PA 22 of 2026, Article 16, Section 303

Health and Human Services

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount	Public Act and Boilerplate Section
Family Planning Performance Pay	2025	State general fund/general purpose	\$195,400	PA 121 of 2024, Article 6, Section 1955
Doula Training and Outreach	2025	Federal funds	\$1,388,900	PA 121 of 2024, Article 6, Section 1948
ARP HCBS Projects		State general fund/general purpose	\$1,388,900	
	2025	ARP - home- and community-based services projects fund	\$254,589,500	PA 22 of 2026, Article 16, Section 354
		Federal funds	\$336,000,000	
Health Services Grants: McLaren Northern MI	2025	State general fund/general purpose	\$13,000,000	PA 22 of 2025, Article 16, Section 358
State Psych DSH Disallowance	2025	State general fund/general purpose	\$78,664,100	PA 22 of 2025, Article 16, Section 361

Fiscal Year 2025 Work Projects - In Statute

Health and Human Services

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount	Public Act and Boilerplate Section
FY25 MiDocs Consortium	2025	Federal funds	\$8,800,100	PA 121 of 2024, Article 6, Section 1870
		Other state restricted revenues	\$5,000,000	
		State general fund/general purpose	\$6,400,100	
Behavioral Health Urgent Care	2025	State general fund/general purpose	\$1,117,100	PA 121 of 2024, Article 6, Section 1924
Walk-In Crisis Center Relocation	2025	State general fund/general purpose	\$2,392,000	PA 121 of 2024, Article 6, Section 1923
Medicaid Orthodontic Benefit	2025	Federal funds	\$2,801,700	PA 121 of 2024, Article 6, Section 1632
		State general fund/general purpose	\$1,500,000	
Adult home help care supports	2025	Federal funds	\$9,000,000	PA 121 of 2024, Article 6, Section 1935
		State general fund/general purpose	\$1,000,000	
Prenatal and Infant Support Program- One time	2025	Healthy Michigan fund	\$250,000,000	PA 22 of 2025, Article 16, Section 360
Underserved Healthcare Facility Project	2025	State general fund/general purpose	\$3,071,000	PA 121 of 2024, Article 6, Section 1947
Nutrition Education	2025	Federal funds	\$23,000,000	PA 22 of 2025, Article 16, Section 353
Trauma Recovery Centers	2025	State general fund/general purpose	\$4,000,000	PA 121 of 2024, Article 6, Section 1967

Fiscal Year 2025 Work Projects - In Statute

Health and Human Services

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount	Public Act and Boilerplate Section
Diaper Assistance Grant (FY25 allocation)	2025	Social security act, temporary assistance for needy families	\$4,581,400	PA 121 of 2024, Article 6, Section 464
Homeless Shelter Operations	2025	State general fund/general purpose	\$1,169,500	PA 121 of 2024, Article 6, Section 1966
Preweatherization (FY25 appropriation)	2025	State general fund/general purpose	\$5,000,000	PA 121 of 2024, Article 6, Section 1992
Water Affordability (FY25 Appropriation)	2025	State general fund/general purpose	\$9,565,200	PA 121 of 2024, Article 6, Section 1965
Nurse Incentive Program	2025	State general fund/general purpose	\$9,165,000	PA 121 of 2024, Article 6, Section 1980
Medicaid Health Plan Services	2025	State general fund/general purpose	\$100,000,000	PA 22 of 2025, Article 16, Section 359
COVID-19 - Epidemiology and Laboratory Capacity for Prevention and Control of Emerging Infectious Diseases	2025	Federal funds	\$61,000,000	PA 22 of 2026, Article 16, Section 357
COVID-19 - Federal COVID Emerging Infections Program	2025	Federal funds	\$2,688,500	PA 22 of 2026, Article 16, Section 356
COVID-19 - ARP - Strengthening U.S. Public Health Infrastructure, Workforce, and Data Systems	2025	Federal funds	\$9,962,900	PA 22 of 2026, Article 16, Section 355
Firearm Training and Technical Assistance	2025	State general fund/general purpose	\$5,400,000	PA 121 of 2024, Article 6, Section 1952
First Responder and Public Safety Staff Mental Health - FY25	2025	State general fund/general purpose	\$1,800,800	PA 121 of 2024, Article 6, Section 1956
Substance Use Treatment Center	2025	State general fund/general purpose	\$2,000,000	PA 121 of 2024, Article 6, Section 1932

Fiscal Year 2025 Work Projects - In Statute

House of Representatives

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount	Public Act and Boilerplate Section
Automated Data Processing	2025	State general fund/general purpose	\$1,915,600	PA 121 of 2024, Article 5, Section 607
Cora Anderson Building	2025	State general fund/general purpose	\$5,670,700	PA 121 of 2024, Article 5, Section 606

Judiciary

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount	Public Act and Boilerplate Section
Eviction Diversion Pilot Program	2025	State general fund/general purpose	\$500,000	PA 121 of 2024, Article 8, Section 401
Status Offender Pilot Program	2025	IDG from Department of Health and Human Services	\$512,100	PA 121 of 2024, Article 8, Section 402
Operation Drive	2025	State general fund/general purpose	\$1,000,000	PA 121 of 2024, Article 8, Section 403
Prescription Compliance through Oral Fluid Testing Program	2025	State general fund/general purpose	\$500,000	PA 121 of 2024, Article 8, Section 404

Fiscal Year 2025 Work Projects - In Statute

Labor and Economic Opportunity

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount	Public Act and Boilerplate Section
Short-Term Loan Program	2025	State general fund/general purpose	\$2,499,000	PA 121 of 2024, Article 9, Section 1040(9)
Centers for Independent Living	2025	State general fund/general purpose	\$1,029,700	PA 121 of 2024, Article 9, Section 905(3)
Community and Worker Economic Transition Office Federal Retooling Grant	2025	Federal funds	\$22,653,100	PA 22 of 2025, Article 16, Section 451
Office of Rural Prosperity Federal	2025	Federal funds	\$350,000	PA 22 of 2025, Article 16, Section 452
Community Enhancement Grants	2025	State general fund/general purpose	\$12,900,000	PA 22 of 2025, Article 16, Sections 463-469
Transmission Siting and Economic Development Program	2025	Federal funds	\$35,800,000	PA 22 of 2025, Article 16, Section 458
Legislatively Directed Spending Items	2025	State general fund/general purpose	\$111,390,000	PA 22 of 2025, Article 16, Section 456

Legislative Services Bureau

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount	Public Act and Boilerplate Section
Legislative Service Bureau Automated Data Processing	2025	State general fund/general purpose	\$1,000	PA 121 of 2024, Article 5, Section 607

Fiscal Year 2025 Work Projects - In Statute

Licensing and Regulatory Affairs

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount	Public Act and Boilerplate Section
Unlicensed Mobile Home Park Enforcement	2025	Mobile home code fund	\$2,400,000	PA 22 of 2025, Article 16, Section 501

Lifelong Education, Advancement, and Potential

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount	Public Act and Boilerplate Section
Sec. 1105 - One Time Administration Supports	2025	State general fund/general purpose	\$925,600	PA 121 of 2024, Article 11, Section 1105(2)
Sec. 1101 - Goodwill Association of Michigan	2025	State general fund/general purpose	\$1,000,000	PA 121 of 2024, Article 11, Sec. 1101
Centro Multicultural la Familia	2025	State general fund/general purpose	\$300,000	PA 22 of 2025, Article XVI, Section 526

Michigan State Housing Development Authority

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount	Public Act and Boilerplate Section
Housing Programs	2025	GF/GP transfer to Michigan State Housing Development Authority	\$11,300,000	PA 121 of 2024, Article 9, Section 1019(20)
Legislatively Directed Spending Items	2025	State general fund/general purpose	\$8,610,000	PA 22 of 2025, Article 16, Section 456

Fiscal Year 2025 Work Projects - In Statute

Michigan Strategic Fund

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount	Public Act and Boilerplate Section
Community Revitalization and Placemaking - Corporate Income Tax	2025	Revitalization and placemaking fund 380	\$50,000,000	PA 121 of 2024, Article 9, Section 528(17)
Minority Owned Business Support	2025	GF/GP transfer to Michigan Strategic Fund - component unit	\$5,384,000	PA 121 of 2024, Article 9, Section 1030(8)
Community Development Block Grant - Disaster Recovery	2025	HUD-CPD, community development block grant	\$43,570,000	PA 22 of 2025, Article 16, Section 457

Military and Veterans Affairs

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount	Public Act and Boilerplate Section
Eliminating Veteran Homelessness Grants	2025	State general fund/general purpose	\$1,337,800	PA 121 of 2024, Section 107

Fiscal Year 2025 Work Projects - In Statute

Natural Resources

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount	Public Act and Boilerplate Section
America 250 Commission Grants	2025	State general fund/general purpose	\$4,775,000	PA 121 of 2024, Article 13, Section 1206(13)
American Chestnut Restoration Initiative	2025	State general fund/general purpose	\$418,500	PA 121 of 2024, Article 13, Section 1202
Hunters Feeding Michigan - Refrigerated Trailers	2025	State general fund/general purpose	\$149,600	PA 121 of 2024, Article 13, Section 1205
Mass Timber Market Development	2025	State general fund/general purpose	\$971,500	PA 121 of 2024, Article 13, Section 1203
Arctic Grayling Fish Passage	2025	Federal funds	\$2,500,000	PA 22 of 2025, Article 16, Section 551
Northern Michigan Ice Storm Reforestation	2025	State general fund/general purpose	\$14,000,000	PA 22 of 2025, Article 16, Section 552

Office of the Auditor General

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount	Public Act and Boilerplate Section
Annual Comprehensive Financial Report	2025	State general fund/general purpose	\$3,000,000	PA 121 of 2024, Article 5, Section 627

Fiscal Year 2025 Work Projects - In Statute

Revenue Sharing

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount	Public Act and Boilerplate Section
Financially Distressed Cities, Villages, or Townships Grant Program	2025	Sales tax	\$2,500,000	PA 121 of 2024, Article 5, Section 956

School Aid

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount	Public Act and Boilerplate Section
Sec. 35m - Committee for Literacy Achievement	2025	School aid fund	\$87,000,000	PA 120 of 2024, Article I, Section 35m
Sec. 35n - READ Innovation	2025	School aid fund	\$10,000,000	PA 120 of 2024, Article I, Section 35n
Sec. 99aa - Project SEARCH	2025	School aid fund	\$1,000,000	PA 120 of 2024, Article I, Section 99aa
Sec. 27p - MARESA Apprenticeships	2025	School aid fund	\$12,500,000	PA 120 of 2024, Article I, Section 27p
Sec. 94d - Special Education Taskforce	2025	State general fund/general purpose	\$1,000,000	PA 120 of 2024, Article I, Section 94d
Sec. 27r - West Michigan Teachers Collaborative	2025	School aid fund	\$7,000,000	PA 120 of 2024, Article I, Section 27r
Sec. 99 - Student Pedestrian Safety	2025	State general fund/general purpose	\$3,700,000	PA 120 of 2024, Article I, Section 99(18)
Sec. 152b - Nonpublic School Reimbursements	2025	State general fund/general purpose	\$1,000,000	PA 120 of 2024, Article I, Section 152b

Fiscal Year 2025 Work Projects - In Statute

School Aid

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount	Public Act and Boilerplate Section
Sec. 27l - Educator Pay and Healthcare Costs	2025	MPSEERS retirement obligation reform reserve	\$147,300,000	PA 15 of 2025, Article I, Section 27l
Sec. 32n - Out-of-School Time Programs	2025	School aid fund	\$203,000,000	PA 15 of 2025, Article I, Section 32n
Sec. 41b - Kalasho Education and Youth Services	2025	School aid fund	\$4,000,000	PA 15 of 2025, Article I, Section 41b
Sec. 61j - Downriver CTE Consortium	2025	School aid fund	\$1,000,000	PA 15 of 2025, Article I, Section 61j
Sec. 97k - Student Advocacy Center of Michigan	2025	School aid fund	\$5,000,000	PA 15 of 2025, Article I, Section 97k
Sec. 99 - District and Entity Specific Payments	2025	School aid fund	\$150,000	PA 15 of 2025, Article I, Section 99
Sec. 99ee - Hispanic Student Supports	2025	State general fund/general purpose	\$20,845,000	PA 15 of 2025, Article I, Section 99ee
Sec. 99mm - Menominee Area Public Schools Repair	2025	School aid fund	\$500,000	PA 15 of 2025, Article I, Section 99mm
Sec. 27h - Mentor Stipends	2025	School aid fund	\$1,000,000	PA 15 of 2025, Article I, Section 27h
			\$4,500,000	
			\$49,418,800	

Fiscal Year 2025 Work Projects - In Statute

Senate

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount	Public Act and Boilerplate Section
Senate Automated Data Processing	2025	State general fund/general purpose	\$5,152,800	PA 121 of 2024, Article 5, Section 607
Senate Building and Other Properties	2025	State general fund/general purpose	\$10,580,100	PA 121 of 2024, Article 5, Section 606

State

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount	Public Act and Boilerplate Section
Help America Vote Act (HAVA) - Election Security Grant	2025	Help America Vote Act - election security	\$9,583,500	PA 22 of 2025, Article 16, Section 601

State Police

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount	Public Act and Boilerplate Section
Law Enforcement Communication Training	2025	State general fund/general purpose	\$500,000	PA 121 of 2024, Article 14, Section 802 (2)
Public Safety Assistance Programs	2025	State general fund/general purpose	\$1,000,000	PA 121 of 2024, Article 14, Section 805 (1)

Fiscal Year 2025 Work Projects - In Statute

Treasury

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount	Public Act and Boilerplate Section
MiABLE Outreach	2025	State general fund/general purpose	\$675,900	PA 121 of 2024, Article 5, Section 994
Universities				

Work Project Title	Project First Year	Fund Name	Est. Work Project Amount	Public Act and Boilerplate Section
Michigan Transfer Pathways	2025	State general fund/general purpose	\$1,000,000	PA 120 of 2024, Article III, Section 236(10)

EXHIBIT B



HOUSE OF REPRESENTATIVES
COMMITTEE ON APPROPRIATIONS
REP. ANN BOLLIN
CHAIR

COMMITTEE MEETING MINUTES

Wednesday, December 10,
2025

9:00 AM

Room 352, State Capitol
Building

The House Committee on Appropriations was called to order by Chair Bollin.

At 9:03 AM, the Chair laid the committee at ease.

At 4:07 PM, the Chair called the committee back to order.

The Chair requested attendance to be called:

Present: Reps. Bollin, Maddock, Phil Green, Jenkins-Arno, Kelly, Markkanen, Mueller, Slagh, VanWoerkom, Beson, Borton, Roth, Cavitt, DeSana, Kuhn, Steele, Robinson, Rogers, Steckloff, Glanville, Edwards, Martus, McKinney, Morgan and Snyder.

Absent: Reps. O'Neal, Farhat, Price and Longjohn.

Excused: Reps. O'Neal, Farhat, Price and Longjohn.

Representative Rogers moved to adopt the meeting minutes from November 12, 2025. There being no objection, the motion prevailed with unanimous consent.

The Chair laid Fiscal Year 2025 Work Project Requests before the committee.

Representative Maddock made a motion to disapprove the 2025 Work Project Requests, as presented. The motion prevailed 16-9-0:

FAVORABLE ROLL CALL

Yeas: Reps. Bollin, Maddock, Phil Green, Jenkins-Arno, Kelly, Markkanen, Mueller, Slagh, VanWoerkom, Beson, Borton, Roth, Cavitt, DeSana, Kuhn and Steele.

Nays: Reps. Robinson, Rogers, Steckloff, Glanville, Edwards, Martus, McKinney, Morgan and Snyder.

Pass: None.

The following person submitted a card wishing to speak in support of the 2025 Work Project Requests, but due to the time constraints were unable to speak:

Phil Santer, representing Ann Arbor SPARK.

Representative Maddock moved to excuse Representatives O'Neal, Farhat, Price and Longjohn from the meeting. There being no objection, the motion prevailed by unanimous consent.

There being no further business before the committee, Chair Bollin adjourned the meeting at 4:11 PM.

Representative Ann Bollin, Chair

Dakota Soda
Committee Clerk
dsoda@house.mi.gov

PROPOSED

EXHIBIT C

MEMORANDUM



DATE: December 10, 2025
TO: Members of the House Appropriations Committee
FROM: Mary Ann Cleary, Director *MAC*
RE: Work Projects Requests

On Friday, November 14, 2025, House and Senate Appropriations Committee members received a letter from the State Budget Office detailing FY 2025 work project accounts. The letter included a summary FY 2025 line item appropriations that were previously designated as work project accounts through boilerplate in an appropriations act and a list of FY 2025 line item appropriations the state budget director is recommending for designation as work project accounts.

Work project accounts are funds remaining in line items that are carried over from one fiscal year to a succeeding fiscal year or years, allowing for the funds to be spent over a multi-year period. Work project accounts are intended for nonrecurring projects with the purpose of accomplishing specific objectives and may not be used for ongoing operations. Under Section 451a (1) of the Management and Budget Act, work project accounts are available until 48 months after the last day of the appropriated fiscal year or until project completion, whichever comes first. Also under that section, the following criteria must be met in order to be designated as a work project account:

- Shall be for a specific purpose.
- Shall contain a specific plan to accomplish its objective.
- Shall have an estimated completion cost.
- Shall have an estimated completion date.

Under Section 451a (2) of the Management and Budget Act, either the House or Senate Appropriations Committee may *disapprove* newly requested work project accounts, which do not have previous statutory authorization, within 30 calendar days of issuance of the work project request submitted by the State Budget Office. This year, HAC or SAC action to disapprove requests needs to occur by December 14, 2025.

FY 2025 line item appropriations previously designated as work project accounts by statute total \$2.4 billion Gross (\$546.9 million GF/GP). FY 2025 line item appropriations the state budget director is recommending for designation as work project accounts total \$2.7 billion Gross (\$657.6 million GF/GP). Of the total requested by the State Budget Office, the Chair of the House Appropriations Committee is proposing to disapprove \$644.9 million Gross (\$351.5 million GF/GP). Attached is a table showing the requested work project accounts the Chair is proposing to disapprove. Following the table is additional detail by department.

If you have questions about work project accounts generally, please contact me. If you have questions about an individual work project account, please contact the HFA analyst assigned to the associated budget area. We can be reached at 373-8080 or by email.

Attachments



**FISCAL YEAR 2025 WORK PROJECTS – NOT IN STATUTE
HOUSE APPROPRIATIONS COMMITTEE
VOTE TO DISAPPROVE**

Summary

<u>Department/Agency</u>	<u>Gross</u>	<u>Federal</u>	<u>Private/Restricted</u>	<u>GF/GP</u>
Community Colleges	\$1,400,000	\$0	\$1,150,000	\$250,000
Corrections	2,100,000	0	0	2,100,000
Education	882,700	0	0	882,700
Environment, Great Lakes, and Energy	18,101,800	2,620,000	15,325,000	156,800
Michigan Gaming Control Board	2,967,600	0	2,967,600	0
Health and Human Services	69,272,800	31,489,200	7,620,700	30,162,900
Labor and Economic Opportunity	137,281,500	0	300,000	136,981,500
Legislative Service Bureau	369,600	0	0	369,600
Licensing and Regulatory Affairs	58,053,600	3,053,600	0	55,000,000
State Lottery	3,000,100	0	3,000,100	0
Michigan Strategic Fund	104,177,500	10,942,700	11,244,000	81,990,800
Natural Resources	6,150,000	0	3,300,000	2,850,000
School Aid	22,780,000	0	21,000,000	1,780,000
State	8,325,000	0	7,575,000	750,000
Technology, Management, and Budget	192,204,800	0	159,310,300	32,894,500
Transportation	12,713,700	0	10,213,700	2,500,000
Treasury	4,981,500	0	2,375,200	2,606,300
Universities	179,500	0	0	179,500
Total	\$644,941,700	\$48,105,500	\$245,381,600	\$351,454,600



**FISCAL YEAR 2025 WORK PROJECTS – NOT IN STATUTE
HOUSE APPROPRIATIONS COMMITTEE
VOTE TO DISAPPROVE**

<u>WORK PROJECTS</u>	<u>FUND SOURCE</u>	<u>AMOUNT</u>
A. Community Colleges 1. COCL - Reconnect Career and Education Navigators 2. COCL - MCCA Local Heroes	School aid fund State general fund/general purpose	\$1,150,000 250,000
B. Corrections 1. Education Improvements	State general fund/ general purpose	\$2,100,000
C. Department of Education 1. Sec. 703 - Indigenous Tribal History Prof Learning Project 2. Sec. 1100 - Charter School Transparency Database	State general fund/general purpose State general fund/general purpose	\$750,000 132,700
D. Department of Environment, Great Lakes, and Energy 1. AmeriCorps 2. Lake Michigan Circuit - Phase I 3. Michigan Energy Academy 4. Clean Michigan Initiative - Brownfields	Federal funds State general fund/general purpose Energy efficiency and renewable energy revolving loan fund Inflation reduction act Clean Michigan initiative, response activities	\$640,000 156,800 325,000 1,980,000 15,000,000
E. Michigan Gaming Control Board 1. MGCB Application Portal (MAP) Continuation	Fantasy contest fund Internet gaming fund Internet sports betting fund	\$407,100 1,707,000 853,500



**FISCAL YEAR 2025 WORK PROJECTS – NOT IN STATUTE
HOUSE APPROPRIATIONS COMMITTEE
VOTE TO DISAPPROVE**

WORK PROJECTS

F. Department of Health and Human Services

1. SOS Network
2. LAHC - Healthy Communities Grant
3. MDHHS Information Technology Projects
4. Prenatal and Infant Support Program
5. Children's Campus Renovation
6. McLaren Greater Lansing Mobile Clinic
7. Native American Health Services
8. Community Impact Center
9. Local Food Infrastructure Grant
10. Nurse Workforce Development
11. Mental Health Services and Community Outreach
12. Healthy Michigan MCIR
13. Cranial Hair Prosthesis
14. FY 25 Drinking Water Declaration of Emergency
15. Firearm safety and violence prevention
16. Complex Medical Condition Center
17. FY25 Opioid Settlement Funds

FUND SOURCE

	<u>AMOUNT</u>
State general fund/general purpose	\$3,000,000
State general fund/general purpose	2,000,000
Capped federal revenues	1,500,000
Federal funds	10,000,000
Social security act, temporary assistance for needy families	1,500,000
State general fund/general purpose	5,000,000
Social security act, temporary assistance for needy families	18,489,200
State general fund/general purpose	1,494,600
State general fund/general purpose	700,000
State general fund/general purpose	3,500,000
State general fund/general purpose	2,500,000
State general fund/general purpose	2,992,500
State general fund/general purpose	4,000,000
State general fund/general purpose	1,427,800
Healthy Michigan fund	553,500
State general fund/general purpose	56,600
State general fund/general purpose	1,674,500
State general fund/general purpose	1,800,000
State general fund/general purpose	16,900
Michigan opioid healing and recovery	7,067,200



**FISCAL YEAR 2025 WORK PROJECTS – NOT IN STATUTE
HOUSE APPROPRIATIONS COMMITTEE
VOTE TO DISAPPROVE**

<u>WORK PROJECTS</u>	<u>FUND SOURCE</u>	<u>AMOUNT</u>
G. Department of Labor and Economic Opportunity		
1. Office of Future Mobility Electrification	State general fund/general purpose	\$2,000,000
2. Community Enhancement Grants	State general fund/general purpose	102,611,500
3. Community Museum Grants	State general fund/general purpose	15,779,700
4. Housing Pilot Program	Private	300,000
5. Symphony Grants	State general fund/general purpose	500,000
6. Talent and Growth	State general fund/general purpose	1,923,100
7. Office of Global Michigan Language Access	State general fund/general purpose	12,859,200
8. Office of Global Michigan Regional Community Collaboratives	State general fund/general purpose	308,000
		1,000,000
H. Legislature - Legislative Service Bureau		
1. Michigan Veterans Facility Ombudsman	State general fund/general purpose	\$368,600
2. National Association Dues	State general fund/general purpose	1,000
I. Department of Licensing and Regulatory Affairs		
1. Indigent Defense Commission Grants	State general fund/general purpose	\$50,000,000
2. Renewable Energy and EIED FY25 Grant	State general fund/general purpose	5,000,000
3. Federal Energy Code and Benchmarking Grants	DOE-OEERE, multiple grants	3,053,600
J. Bureau of State Lottery		
1. Lottery IT Replacement/Enhancement Projects	State lottery fund	\$1,050,100
2. Lottery Innovation and Modernization to increase efficiencies and revenues that will impact the School Aid Fund	State lottery fund	1,950,000



**FISCAL YEAR 2025 WORK PROJECTS – NOT IN STATUTE
HOUSE APPROPRIATIONS COMMITTEE
VOTE TO DISAPPROVE**

WORK PROJECTS

FUND SOURCE

AMOUNT

K. Michigan Strategic Fund

1. Michigan Innovation Fund
2. Infrastructure Grants
3. Talent and Growth
4. Downtown Development
5. Agricultural Tourism Hub Redevelopment
6. COVID-19 - Community Development Block Grant - Federal CARES

21st century jobs trust fund
GF/GP transfer to Michigan Strategic Fund - component unit
GF/GP transfer to Michigan Strategic Fund - component unit
GF/GP transfer to Michigan Strategic Fund - component unit
GF/GP transfer to Michigan Strategic Fund - component unit
HUD-CPD, community development block grant

\$11,244,000
63,478,800
16,362,000
150,000
2,000,000
10,942,700

L. Natural Resources

1. Fisheries Habitat Improvement Grants
2. Nature Awaits Exhibit and Facility Upgrades
3. Interpretive Signage and Trail Improvements at State Parks
4. Report All Poaching Communications Center Relocation
5. Body-Worn Camera Implementation
6. Archaeological Services on DNR-Managed Land and Great Lakes Bottomlands
7. Visitor Center Exhibit and Facility Upgrades
8. Wildlife Building Demolitions and Hazardous Material Abatement
9. Fisheries Major Maintenance, Equipment, and Cormorant Management

Game and fish protection fund
State general fund/general purpose
Park improvement fund
Game and fish protection fund
State general fund/general purpose
State general fund/general purpose
State general fund/general purpose

\$50,000
2,200,000
400,000
50,000
50,000
400,000
200,000

Park improvement fund

200,000
1,000,000
1,600,000

M. School Aid

1. Sec. 27g - Talent Together Coalition
2. Sec. 11s – Drinking Water Declaration of Emergency
3. Sec. 97h - Firearms Storage Tip Line
4. Sec. 33 - MI Creative Potential

School aid fund
School aid fund
State general fund/general purpose
School aid fund
School aid fund

\$12,500,000
5,000,000
1,780,000
1,000,000
2,500,000



**FISCAL YEAR 2025 WORK PROJECTS – NOT IN STATUTE
HOUSE APPROPRIATIONS COMMITTEE
VOTE TO DISAPPROVE**

<u>WORK PROJECTS</u>	<u>FUND SOURCE</u>	<u>AMOUNT</u>
N. Department of State <ul style="list-style-type: none">1. ADA Digital Compliance2. Voting Equipment Refresh3. Cybersecurity and Infrastructure Security	State general fund/general purpose Election administration support fund Transportation administration collection fund	\$750,000 7,200,000 375,000
O. Department of Technology, Management, and Budget <ul style="list-style-type: none">1. Office of State Employer (OSE) - Staff Development and Labor Relations Training2. Building Operation Division (BOD) - Feminine Hygiene3. Enterprisewide Information Technology Investment Projects4. Make it in Michigan Competitiveness Fund	State general fund/general purpose State general fund/general purpose State general fund/general purpose Make it in Michigan competitiveness fund	\$180,000 1,214,500 31,500,000 159,310,300
P. State Transportation Department <ul style="list-style-type: none">1. Passenger Transportation Services - Technology Enhancement2. Service Initiatives Projects (2025)3. School Zone Automated Enforcement Pilot Study4. Work Zone Safety Cameras5. 2030 Standard Specifications for Construction	Comprehensive transportation fund Comprehensive transportation fund State general fund/general purpose State trunkline fund State trunkline fund	\$848,100 4,131,900 2,500,000 2,940,000 2,293,700
Q. Department of Treasury <ul style="list-style-type: none">1. Assistance for Communities and Schools in Potential Distress2. Elective Pay Ambassador Program3. ELITES Project4. Revenue Sharing Web Application IT Project	State general fund/general purpose State general fund/general purpose Delinquent tax collection revenue State general fund/general purpose State general fund/general purpose	\$1,800,000 250,000 2,375,200 26,300 530,000
R. Universities <ul style="list-style-type: none">1. UNIV - Education Performance Study	State general fund/general purpose	\$179,500

EXHIBIT D



SARAH E. ANTHONY

21ST DISTRICT

P.O. BOX 30036

LANSING, MI 48909-7536

PHONE: (517) 373-6960

FAX: (517) 373-0897

sensanthony@senate.michigan.gov

THE SENATE
STATE OF MICHIGAN

December 16, 2025

State of Michigan
The Honorable Dana Nessel, Attorney General
Attn: Opinion Department
G. Mennen Williams Building
P.O. Box 30212
Lansing, MI 48909

RE: Request for Formal Opinion

Dear Attorney General Nessel:

Last week, the Appropriations Committee of the Michigan House of Representatives invoked a rarely used provision in The Management and Budget Act ("the Act"), 1984 PA 431, to discontinue nearly \$645 million in funding that was already approved by a prior legislature and the governor.

Much of this funding has already been designated to numerous organizations for a variety of critical purposes, including supporting new mothers and babies during the most vulnerable stage of life, providing wigs to children battling cancer, investing in affordable housing solutions, combating the opioid epidemic, and many more items that support the well-being of residents across our entire state.

The scope of this action is unprecedented, and as such, it has raised serious questions about the legality of Section 451a of the Act and the committee's application of that language. To that end, I ask for your opinion as to the following question:

Whether the provision in MCL 18.1451a(3), allowing either the Senate or House Appropriations committees to disapprove work projects designated by the State Budget Director, violates the Michigan Constitution?

Thank you in advance for your consideration of this request. Please do not hesitate to contact my office if you have questions or need additional information.

Sincerely,

Sarah Anthony
21st District

RECEIVED by MCCOC 1/9/2026 2:13:19 PM

EXHIBIT E

STATE OF MICHIGAN

DANA NESSEL, ATTORNEY GENERAL

CONSTITUTIONAL LAW:	Constitutionality of MCL
SEPARATION OF POWERS:	18.1451a(3), which allows the Senate
BICAMERALISM AND	or House Appropriations Committee
PRESENTMENT:	to disapprove of work projects
	designated by the State Budget
	Director
APPROPRIATIONS:	
SEVERANCE:	

The disapproval mechanism in MCL 18.1451a(3) amounts to a legislative committee veto that violates Article 3, § 2 of the Michigan Constitution, which requires the separation of powers between the three branches of government, and Article 4, § 33, which requires legislation to be completed consistent with the bicameralism and presentment requirements set forth in the Michigan Constitution.

Although the disapproval mechanism in MCL 18.1451a(3) is unconstitutional, the invalid portion is legally severable because the remaining provisions regarding temporal limits, substantive criteria, and reporting requirements are independently operable and further the Legislature's intent for fiscal oversight over work projects.

Opinion No. 7328

Date: January 7, 2026

Honorable Sarah E. Anthony
State Senator
The Capitol
P.O. Box 30036
Lansing, MI 48909-7536

You have asked whether the provision in MCL 18.1451a(3), allowing either the Senate or House Appropriations Committees to disapprove work projects designated by the State Budget Director, violates the Michigan Constitution.

RECEIVED by MCOC 1/9/2026 2:13:19 PM

As noted in your request, the Michigan House Appropriations Committee recently invoked this provision to discontinue nearly \$645 million in funding that had been authorized by the Governor and the prior Legislature. These appropriations were designated as “work projects” by the State Budget Director under MCL 18.1451a(3), which requires the Director to notify the legislative appropriations committees of such designations within 45 days of the fiscal year’s end.

Under the statute, these designations “may be disapproved by either appropriations committee within 30 days” of notification. MCL 18.1451a(3). Pursuant to this procedure, the House Appropriations Committee disapproved a number of the Director’s designations, preventing the expenditure of \$645 million in funding.

You now seek my opinion as to whether this statutory power of either the House or Senate Appropriations Committees to “disapprove” line-item appropriations designated as work projects by the State Budget Office’s Director violates the Michigan Constitution. To answer this question, it is necessary to first address Michigan’s appropriations process, including its constitutional framework, the statutory rules governing how appropriated funds may be spent, and the framework for work projects in general.

BACKGROUND

The Appropriations Process

The Michigan Constitution vests the Legislature with the power to appropriate public funds and establishes specific procedures for doing so. Under Article 4, § 31, the Legislature must prioritize general appropriation bills for the “succeeding fiscal period” before either chamber “passes any appropriation bill for items not in the budget except bills supplementing appropriations for the current fiscal year’s operation.”¹ Appropriation bills are an important feature of government because, under Article 9, § 17, “[n]o money shall be paid out of the state treasury except in pursuance of appropriations made by law.”

The framework governing the expenditure of appropriations is codified at MCL 18.1452(2), which requires that “[e]ach of the amounts appropriated shall be used solely for the respective purposes stated in the budget act except as otherwise provided by law.” In addition to this purpose-based restriction, MCL 18.1451(1) establishes a general timeframe for the expenditure of appropriated funds: “At the close of the fiscal year, the unencumbered balance of each appropriation shall lapse to the state fund from which it was appropriated.” In other words, any unexpended or otherwise unencumbered portion of appropriated moneys that remains at the end of a given fiscal year “lapses.”

¹ The Constitution’s use of the term “period” rather than “year” suggests a degree of flexibility regarding the duration of an appropriation.

Work Projects

But by establishing “work projects,” MCL 18.1451a creates an exception to the temporal limitation in MCL 18.1451. Under this provision, a work-project appropriation remains available until either the work is completed or for up to 48 months “after the last day of the fiscal year in which the appropriation was originally made, whichever comes first.” MCL 18.1451a(1). The statute sets forth the following components, each of which must be met for an appropriation to be a work project:

- (a) The work project shall be for a specific purpose.
- (b) The work project shall contain a specific plan to accomplish its objective.
- (c) The work project shall have an estimated completion cost.
- (d) The work project shall have an estimated completion date. [*Id.*]

Generally, work projects are separated into two categories: statutory work projects and designated work projects. A statutory work project occurs when the Legislature, within an appropriations bill, expressly identifies a line item as a “work project” and sets forth the four required components directly in the text of the bill.

A designated work project, on the other hand, is created under MCL 18.1451a(3), which vests the State Budget Director with the authority to “designate” specific line-item appropriations as work projects. For the Director’s designations to become effective, MCL 18.1451a(3) requires the Director to first

notify the House and Senate Appropriations Committees of his or her intent to designate the funds. Either Committee then has 30 days from the date of notification to “disapprove” the designation. *Id.* If either Committee exercises this disapproval authority within the 30-day timeframe, the Director’s designation “shall not be effective.” *Id.* In other words, a timely disapproval by either Committee serves as a statutory bar to the Director’s designation of a work project. But if there is no disapproval, then the executive branch retains an additional three years after the close of the preceding fiscal year to expend the appropriated funds.

Here, the Legislature, through the General Appropriations Bills, 2024 PA 120 and 2024 PA 121, and the Supplemental Appropriations Bills, 2024 PA 135 and 2024 PA 148, exercised its legislative power to appropriate funds. From the line items appropriated for fiscal year 2025, the State Budget Director designated \$2.7 billion in gross appropriations as work projects, including \$657.6 million from the general fund. Consistent with MCL 18.1451a(3), the Director notified the Appropriations Committees, as well as the legislative fiscal agencies, of the proposed work-project designations. Of the total designations, the House Appropriations Committee “disapproved” \$644.9 million, effectively blocking the continued use of these appropriated funds.

ANALYSIS

With the relevant background established, the question to be addressed is whether the provision in MCL 18.1451a(3) that allows either the Senate or House

Appropriations Committees to disapprove work projects designated by the State Budget Director violates the Michigan Constitution.

Although MCL 18.1451a(3) appears to grant either the House or Senate Appropriations Committee a final check on work-project designations, statutory authorization does not equate to constitutional validity. The dispositive issue is whether the Legislature may constitutionally reserve for itself, or a committee within a chamber of itself, the authority to block executive action after an appropriation has already been signed into law. It may not. Reserving such authority over work projects violates the Michigan Constitution in at least two fundamental respects.

First, MCL 18.1451a(3) impermissibly allows a single legislative committee to exert ongoing control over the executive implementation of enacted laws. The appropriation bills implicated here were complete upon enactment. The subsequent work-project designations by the State Budget Director were proper acts of executive implementation. By subjecting this executive action to a post-enactment legislative committee disapproval, MCL 18.1451a(3) impermissibly extends legislative authority into the executive's constitutional domain in violation of the separation-of-powers provision.

Second, the legislative committee disapproval circumvents the constitutional requirements of bicameralism and presentment. Unlike the original appropriation, which required passage by both chambers and submission to the Governor, the

legislative committee disapproval operates through a truncated process that bypasses these constitutional safeguards.

Both of these reasons are discussed in further detail below.

The committee disapproval mechanism usurps executive power in violation of the separation-of-powers provision of the Michigan Constitution.

The Michigan Constitution provides for the separation of powers of the State among the three branches of government: “The powers of government are divided into three branches: legislative, executive, and judicial. No person exercising powers of one branch shall exercise powers properly belonging to another branch *except as expressly provided in this constitution.*” Const 1963, art 3, § 2 (emphasis added). This constitutional principle protects individual liberty by ensuring that no single branch can consolidate and exercise the powers of another. See *In re Certified Questions from the United States District Court, W Dist of Mich*, 506 Mich 332, 357 (2020) (“[w]hen the legislative and executive powers are united in the same person, or in the same body of magistrates, there can be no liberty’”), quoting Montesquieu, *The Spirit of the Laws* (London: J. Nourse and P. Vaillant, 1758), Book XI, ch 6, p 216.

Relevant here, the legislative power is vested in a bicameral Senate and House of Representatives. Const 1963, art 4, §§ 1–3. The Legislature’s fundamental power to enact laws includes the constitutional authority and duty to “appropriate funds.” Thomas M. Cooley, *A Treatise on the Constitutional*

Limitations (Little, Brown & Co., 1886), p 92; *Civil Serv Comm v Auditor General*, 302 Mich 673, 682 (1942); *Int’l Union, United Automobile, Aerospace & Agricultural Implement Workers of America, UAW Local 6000 v Michigan*, 194 Mich App 489, 501 (1992).

The appropriations power is constitutionally defined. As mentioned, Article 9, § 17 establishes the foundational principle that “no money shall be paid out of the state treasury except in pursuance of appropriations made by law.” And Article 4, § 31 mandates a specific process for general appropriation bills: “[G]eneral appropriation bills for the succeeding fiscal period covering items set forth in the budget shall be passed or rejected in either house of the Legislature before that house passes any appropriation bill for items not in the budget.”

Critically, however, the Legislature’s constitutional role in the appropriations process has defined temporal and functional limits. Once the Legislature enacts appropriations through the constitutionally required bicameral process and gubernatorial approval, “the legislature’s area of exclusive operation is ended.” OAG, 1955–1956, No 2249, p 565, 568; see also *Blank v Dep’t of Corr*, 462 Mich 103, 117 (2000) (observing that, absent an unconstitutional statutory legislative veto, “the only way that the Legislature could influence the promulgation of the rules would be to enact new legislation”). See also *Bowsher v Synar*, 478 US 714, 733 (1986) (“[O]nce Congress makes its choice in enacting legislation, its participation ends.”) (citation omitted); *id.* at 733–734 (“Congress can thereafter control the execution of its enactment only indirectly—by passing new legislation.”), citing

Immigration & Naturalization Serv v Chadha, 462 US 919, 958 (1983). This principle reflects a fundamental aspect of separation of powers—each branch must exercise its constitutional powers within defined boundaries and cannot retain ongoing control over matters that have passed into another branch’s constitutional sphere.

Although Michigan’s separation-of-powers provision “does not require so strict a separation as to provide no overlap of responsibilities and powers” between the branches, *Judicial Attorneys Association v Michigan*, 459 Mich 291, 296 (1998), such sharing of power is permissible only if the authority granted is “limited and specific and does not create encroachment or aggrandizement of one branch at the expense of the other,” *id.* Here, the authority granted to the Appropriations Committees by MCL 18.1451a(3) is exclusively executive in character, and it therefore encroaches on the executive branch’s constitutional role. When an appropriations bill becomes law, constitutional responsibility shifts to the executive branch. Through its mandate to “take care that the laws be faithfully executed,” the executive assumes responsibility for implementing legislative appropriations and spending appropriated funds for their designated purposes. See *UAW*, 194 Mich App at 501. As case law and Attorney General opinions have long observed, allocating and expending appropriated funds are inherently executive functions. See, e.g., *id.* (“The executive branch of the government executes the laws and spends appropriated funds for designated purposes.”); OAG, 1975–1976, No. 4896, p 133, 151 (“The executive branch of government is responsible for the implementation of

appropriation acts, not the legislative branch of government.”); OAG, 1955–1956, No. 2249, pp 565, 568 (“[B]efore the fund appropriated can be used for governmental purposes, they must be ‘allocated’ or ‘expended.’ This is a function of the executive or administrative branch of the government.”). This power necessarily confers discretion over the specific mechanisms and timing of expenditures, provided the executive branch does not “frustrate the Legislature’s intent.” *UAW*, 194 Mich App at 501.

Attorney General Frank Kelley underscored these principles in OAG No. 4896, analyzing a provision of the General Government Appropriations Act that required legislative committee approval for consultant contracts exceeding \$50,000.00.² The Attorney General concluded that this requirement unconstitutionally encroached upon the executive sphere:

[T]he legislature may not perform executive functions. . . . [Once] having [appropriated funds], the legislature does not possess, retain or have access to any form of administration or monitoring thereof. [OAG, 1975–1976, No. 4896, pp 133, 150–151.]

Although Attorney General Kelley noted that the Legislature may require the executive branch to furnish informational reports regarding funded programs, he concluded that the Legislature “cannot assume administrative controls” over those funds once the appropriation is made. *Id.* at 151. In short, the Legislature’s

² Section 8(6) of the General Government Appropriations Act, HB 4439, provided in part that “[a]ll proposed consultant contracts exceeding \$50,000.00 shall: (a) be reviewed and approved by the appropriations committees, and (b) be posted for public information prior to management science approval in the secretary of state, Lansing office.” OAG, 1975–1976, No. 4896, pp 133, 149.

appropriation power ends at the point of enactment, leaving only the executive branch with the power to implement and expend appropriated funds.

Applying these principles to the factual circumstance presented, MCL 18.1451a(3) allows the House Appropriations Committee to unilaterally discontinue \$645 million in funding, which moves beyond a permissible “overlap” and into an unconstitutional “aggrandizement” of legislative power. By empowering a single legislative committee to negate the State Budget Director’s work-project designations, the statute reserves the very administrative control that the separation of powers forbids. This disapproval mechanism effectively creates a “legislative veto”—or, more accurately, a “legislative committee veto”—which constitutes an unconstitutional reservation of administrative control over the executive branch’s core function of executing the laws. Under Article 3, § 2, when an appropriation is enacted, the Legislature’s role ends, and the executive branch’s duty to faithfully execute the law begins.

Whether the Director faithfully executed the law consistent with legislative intent as it relates to the creation of work projects depends on the *purpose* for which funds were appropriated, not the *duration* those funds remain available. The Constitution and statutory framework make this distinction clear. Article 9, § 17 requires that funds be “paid out of the state treasury . . . in pursuance of appropriations made by law”—that is, consistent with a legislatively specified purpose. Similarly, MCL 18.1452(2) mandates that “[e]ach of the amounts appropriated shall be used solely for the respective purposes stated in the budget

act.” Both provisions focus on the substantive use of funds, not the temporal mechanics of their availability.

The work-project statute reinforces this distinction. MCL 18.1451a(1)(a) requires that “[t]he work project shall be for a specific purpose”—the same purpose already designated in the appropriation itself. A work-project designation does not change what the funds are spent on; it affects only how long they remain available to be spent for that legislatively determined purpose. In other words, the purpose remains fixed by the original appropriation.

MCL 18.1451a further confirms that the Director’s work-project designations faithfully executed the law and implemented only the Legislature’s expressed intent. In enacting the work-project statute, the Legislature acknowledged the practical reality that some appropriations—for example, infrastructure improvements, multi-year studies, or complex procurements—often require more time to execute than a single fiscal year allows. Indeed, it would frustrate legislative intent for appropriated funds to lapse merely because they could not be spent within an arbitrary 12-month window, particularly where the Legislature has already determined that the normal lapse rule should not apply to work projects meeting the statutory criteria. The Director’s designation authority exists precisely to implement the Legislature’s policy choice that certain appropriations should not be artificially constrained by the fiscal year.³ When the Director designates such

³ Further, the threat of a unilateral rescission of funds by a single committee may create a perverse incentive for recipients to engage in “use it or lose it” spending—

appropriations as work projects, he or she is faithfully executing the law and carrying out the Legislature's intent that funds appropriated for projects of this nature should remain available until completion.

The legislative committee veto power circumvents constitutional bicameralism and presentment requirements.

Beyond the general prohibition against reserving administrative control of appropriated funds, the legislative committee veto in MCL 18.1451a(3) violates the Constitution for a similar, related reason: it permits a single committee to exercise legislative power without adhering to the constitutional mandates of bicameralism and presentment.

The legislative power is exercised in the form of "legislation," which "*shall* be by bill and may originate in either house." Const 1963, art 4, § 22 (emphasis added). And "[e]very bill passed by the legislature shall be presented to the governor before it becomes law." Const 1963, art 4, § 33. In other words, while legislative power can be exercised in myriad ways and across various areas of policy, it must be "exercised in accord with a single, finely wrought and exhaustively considered [] procedure." *Chadha*, 462 US at 951.

This conclusion is firmly established in both federal and state jurisprudence. As recognized in both *Chadha* (federal) and *Blank* (state), the Legislature cannot

rushing to exhaust funds before they are discontinued. Such hurried expenditures risk the unwise or inefficient use of taxpayer dollars.

circumvent the formal lawmaking process by reserving to itself a veto over executive action, whether by both houses, a single house, or a legislative committee. Under the rubric set forth in those cases, the legislative committee veto authorized by MCL 18.1451a(3) is unconstitutional.

The core issue in *Chadha* was the constitutionality of the one-House legislative veto provision contained in § 244(c)(2) of the Immigration and Nationality Act,⁴ which authorized either the U.S. Senate or House of Representatives, by resolution, to invalidate the executive branch’s decision to allow a deportable individual to remain in the United States. 462 US at 923.

Chadha’s nonimmigrant student visa had expired, and he had been granted a suspension of deportation by an immigration judge acting pursuant to authority delegated to the Attorney General under § 244(a)(1) of the Act. *Id.* at 923–925. Subsequently, under § 244(c)(2), the House of Representatives passed a resolution vetoing the suspension, which reversed the Attorney General’s determination and mandated Chadha’s deportation. *Id.* at 925–928.

The question before the Court was whether this process—which did not follow the constitutional requirements of bicameral passage and presentment to the President, as outlined in Article I, § 7 of the U.S. Constitution—violated the separation of powers. Thus, the Court was tasked with evaluating whether “the challenged action under § 244(c)(2) is of the kind to which the procedural

⁴ At the time *Chadha* was decided, this provision was codified at 8 USC 1254(c)(2).

requirements of Art. I, § 7 apply.” *Id.* at 952. While “[n]ot every action taken by either House is subject to the bicameralism and presentment requirements of Art. I,” if the action taken is “in law and fact, an exercise of legislative power,” then Congress was required to follow the strictures of Article I—bicameralism and presentment. *Id.*

To evaluate whether the act was “an exercise of legislative power,” the Court considered several factors. *Id.* First, it examined whether the action taken under the statute is “essentially legislative in purpose and effect.” *Id.* The Court concluded that the act of overriding the Attorney General’s statutorily endowed judgment “had the purpose and effect of altering the legal rights, duties and relations of persons, including the Attorney General, Executive Branch officials and Chadha, all outside the legislative branch.” *Id.*

Second, the Court found important “the character of the Congressional action it supplants.” *Id.* at 952–953. Without § 244(c)(2), the only way the Attorney General’s deportation decision could be overridden would be via legislation achieved through bicameralism and presentment. *Id.* at 953–954.

Third, “[t]he nature of the decision implemented by the one-House veto” was significant. *Id.* at 954. Although Congress was of course permitted to, and did, “delegate to the Executive Branch . . . the authority to allow deportable aliens to remain in this country in certain specified circumstances,” *id.*, disagreement with the specific execution of that authority by the Attorney General “involves

determinations of policy that Congress can implement in only one way”—via legislation. *Id.*

Finally, and perhaps most crucially, the Court understood that “when the Framers intended to authorize either House of Congress to act alone and outside of its prescribed bicameral legislative role, they narrowly and precisely defined the procedure for such action.” *Id.* at 955. The Court identified four provisions in the Constitution—all “explicit and unambiguous”—that permitted action by only one House of Congress. *Id.* at 955.⁵ These “carefully defined exceptions from presentment and bicameralism,” which are “narrow, explicit, and separately justified,” did not authorize the legislative veto in § 244(c)(2). *Id.* at 956. Thus, as an exercise of legislative power, “what has been attempted by one House of Congress in this case requires action in conformity with the express procedures of the Constitution’s prescription for legislative action: passage by a majority of both Houses and presentment to the President.” *Id.* at 958. Accordingly, the legislative veto in § 244(c)(2) was unconstitutional. *Id.* at 959.

In a 2000 plurality opinion, the Michigan Supreme Court considered and applied *Chadha*’s analysis to a legislative veto in Michigan law. *Blank*, 462 Mich at

⁵ The four provisions are US Const, art I, § 2, cl 6 (giving the House the power to initiate impeachments); US Const, art I, § 3, cl 5 (giving the Senate the authority to conduct impeachment trials and to convict after trial); US Const, art II, § 2, cl 2 (giving the Senate the power to approve or disapprove presidential appointments); and US Const, art II, § 2, cl 2 (giving the Senate the power to ratify treaties). See *Chadha*, 462 US at 955.

114–115. Similar to *Chadha*, the issue in *Blank* was the constitutionality of legislative mechanisms in §§ 45 and 46 of the Administrative Procedures Act (APA), MCL 24.245 and MCL 24.246, that required administrative agencies to obtain the approval of a joint committee of the Legislature, or the Legislature itself, before enacting new administrative rules. Faced with a state statute with similarities to the Immigration and Nationality Act’s § 244(c)(2), the lead opinion in *Blank* looked to the rubric from *Chadha*, finding it applicable because, “pursuant to §§ 45 and 46, the Legislature has the power to render illusory its delegation of rulemaking authority.” *Blank*, 462 Mich at 115.

The lead opinion in *Blank* assessed the *Chadha* factors, ultimately determining that “the action of [the joint committee] or the Legislature in exercising the authority granted by §§ 45 and 46 of the APA is inherently legislative,” *id.*, and therefore required bicameralism and presentment. That opinion concluded that the statute invalidly vested the committee or the Legislature with “the power to alter the rights, duties, and relations of parties outside the legislative branch” as its action “affect[s] the duty of the [Department of Corrections (DOC)] director, who is an individual outside the legislative branch.” *Id.* at 116. Moreover, vetoing administrative rules “promulgated by DOC involves policy determinations”—made after receiving testimony and comments from the public—and policy determinations are “fundamentally a legislative function.” *Id.* As in *Chadha*, that policy decision “supplants other legislative methods for reaching the same result,” because “the only way that the Legislature could influence the promulgation of the rules would

be to enact new legislation.” *Id.* at 117. Because the statute purported to authorize the use of legislative power, bicameralism and presentment were required.

The analyses of *Chadha* and *Blank* apply to the legislative committee veto contained in MCL 18.1451a(3). Like the one-House override of the Attorney General’s decision regarding deportation in *Chadha* and the requirement of legislative approval of agency promulgated rules in *Blank*, MCL 18.1451a(3) purports to permit a single legislative committee to unilaterally “disapprove” of executive action. Whether that act violates the Constitution in this manner is therefore subject to the considerations analyzed in *Chadha* and *Blank*. Each of which is discussed below.

The Appropriations Committee’s disapproval had both the “purpose and effect” of affecting persons outside of the legislative branch.

The first consideration is whether the challenged action had the “purpose and effect of altering the legal rights, duties and relations of persons . . . outside the legislative branch.” *Chadha*, 462 US at 952. Like the one-House veto in *Chadha*, the House Appropriations Committee’s “disapproval” “operated in this case to overrule” the State Budget Director’s designation of work-project appropriations. *Id.* See also *Blank*, 462 Mich at 116 (finding that the legislative committee’s action “affect[s] the duty of the DOC director, who is an individual outside the legislative branch”). The House Appropriations Committee’s “disapproval” of work projects affects not only the Director, but also the intended recipients and beneficiaries of those legislative appropriations, appropriations that could not be altered by the

Legislature after enactment. OAG, 1955–1956, No 2249, p 565; *Bowsher*, 478 US at 733. But for the House Appropriations Committee’s action, the appropriations would be designated as work-project appropriations.

The Appropriations Committee’s action supplanted legislative action.

As in *Chadha* and *Blank*, absent the second sentence in MCL 18.1451a(3), the Legislature (let alone a single committee of one house) would have no power or authority to disapprove work-project designations or otherwise make appropriations decisions outside of the legislative process. As a result, the legislative committee veto in MCL 18.1451a(3) supplants legislation. See *Chadha*, 462 US at 953–954. Yet it is only through the standard legislative process that our Constitution grants the Legislature the authority to make laws, including decisions concerning the appropriation of funds. In other words, “the only way that the Legislature could influence the [appropriation of funds] would be to enact new legislation.” *Blank*, 462 Mich at 117.

The Appropriations Committee’s action is an expression of policy.

Again, as in both *Chadha* and *Blank*, the action of “disapproval” is one of policymaking. Decisions regarding appropriations of funds are paradigmatic legislative policy matters. See *Regents of Univ of Michigan v State*, 395 Mich 52, 70 (1975) (“[T]he Legislature holds the power of the purse.”); see also *United States v Butler*, 297 US 1, 85 (1936) (STONE, J., dissenting) (“This independent grant of the power of the purse, and its very nature, involving in its exercise the duty to insure

expenditure within the granted power, *presuppose freedom of selection among divers[e] ends and aims*, and the capacity to impose such conditions as will render the choice effective”) (emphasis added).

The legislative power of appropriations is exercised in the form of “legislation,” which “shall be by bill.” Const 1963, art 4, § 22; see also Const 1963, art 4, § 26 (“No bill shall become a law without the concurrence of a majority of the members elected to and serving in each house.”); Const 1963, art 9, § 17 (“[n]o money shall be paid out of the state treasury except in pursuance of appropriations *made by law*”) (emphasis added). And the decision whether to authorize appropriations, or to subsequently disapprove the executive’s work-project designation of such appropriations, “involves determinations of policy that [the Legislature] can implement in only one way”—via legislation. *Chadha*, 462 US at 954.

The constitution explicitly empowers the Appropriations Committee to act only in a single, narrow, emergency instance that does not authorize its purported work-project disapproval authority here.

This conclusion is reinforced by the fact that the Constitution establishes a narrowly defined circumstance in which legislative committees *do* have what amounts to a legislative committee veto. See Const 1963, art 5, § 20. The Framers knew how to create a lane for legislative committees to have authority outside of that of the whole Legislature, and they did so—but in only one specific, emergency circumstance that is inapplicable here: where reductions in expenditures are required due to actual revenues falling below estimates. *Id.* That specific

constitutional grant of authority, coupled with the absence of any such grant in this particular circumstance, further confirms the unconstitutionality of the legislative committee veto in MCL 18.1451a(3). Indeed, the fact that a single committee of a single chamber, without any specific grant of constitutional authority, has been granted this statutory authority highlights the separation-of-powers problem.

Both *Chadha* and *Blank* explain that the existence of other, specific constitutional provisions that deviate from the standard rules of bicameralism and presentment for passing legislation is strong evidence that other such exceptions are not permitted. In *Chadha*, the U.S. Supreme Court recognized that discrete exceptions to the bicameralism and presentment requirements provide strong evidence of the Framers' intent that there are no others. 462 US at 955. The Court observed: "[W]e see that when the Framers intended to authorize either House of Congress to act alone and outside of its prescribed bicameral legislative role, they narrowly and precisely defined the procedure for such action." *Id.* The Court identified four "explicit and unambiguous" provisions of the federal Constitution authorizing "one House [to] act alone with the unreviewable force of law." *Id.* The Court then drew a strong inference from the Constitution's silence on Congress's claimed power to override the U.S. Attorney General's decision to permit a particular deportable individual to remain in the country:

Clearly, when the Draftsmen sought to confer special powers on one House, independent of the other House, or of the President, they did so in explicit, unambiguous terms. These carefully defined exceptions from presentment and bicameralism underscore the difference between the legislative functions of Congress and other unilateral but important and binding one-House acts provided for in the Constitution.

These exceptions are narrow, explicit, and separately justified; none of them authorize the action challenged here. On the contrary, they provide further support for the conclusion that Congressional authority is not to be implied and for the conclusion that the veto provided for in § 244(c)(2) is not authorized by the constitutional design of the powers of the Legislative Branch. [*Id.* at 955–956 (footnote omitted; emphasis added).]

Thus, the Court determined that “[s]ince it is clear that the action by the House under § 244(c)(2) was not within any of the express constitutional exceptions authorizing one House to act alone, and equally clear that it was an exercise of legislative power, that action was subject to the standards prescribed in Article I,” *i.e.*, “[t]he bicameral requirement, the Presentment Clauses, the President’s veto, and Congress’ power to override a veto[.]” *Id.* at 956–957.

Likewise, in *Blank*, the Michigan Supreme Court considered the relevance of the Michigan Constitution’s limited grant of authority to the Legislature to empower a joint legislative committee to suspend any rule or regulation promulgated *during a recess of the Legislature*. Const 1963, art 4, § 37. Relying on that provision, the petitioners broadly argued for the constitutionality of the Joint Committee on Administrative Rule’s (JCAR) authority to “approve or disapprove rules proposed by executive branch agencies.” *Blank*, 462 Mich at 118. But *Blank* disagreed and confirmed that the *limited* grant of authority to “*temporarily* suspend the implementation of a rule” foreclosed the premise that the constitution implicitly granted “the authority *permanently* to block implementation of a rule.” *Id.* at 119 (emphasis added). What is more, the temporary suspension power in Article 4, § 37

was best understood as a “restrict[ion] [on] the Legislature’s power over agency rulemaking.” *Id.* at 120.

Applying *Chadha* and *Blank* here yields further evidence that the disapproval mechanism in MCL 18.1451a(3) purports to authorize an unconstitutional legislative committee veto. The Michigan Constitution *does* create a limited grant of authority to the Appropriations Committees, but only in a specific and narrow situation that is not relevant here—where the revenue projections on which a state budget was formulated turn out to be inaccurate, necessitating emergency funding adjustments. See Const 1963, art 5, § 20. The existence of this targeted authority—a plain deviation from the Constitution’s bicameralism and presentment requirements—speaks volumes about the absence of any constitutional authority for a single committee’s veto power over work-project designations.

Article 5, § 20 provides:

No appropriation shall be a mandate to spend. The governor, *with the approval of the appropriating committees of the house and senate*, shall reduce expenditures authorized by appropriations whenever it appears that actual revenues for a fiscal period will fall below the revenue estimates on which appropriations for that period were based. *Reductions in expenditures shall be made in accordance with procedures prescribed by law.* The governor may not reduce expenditures of the legislative and judicial branches or from funds constitutionally dedicated for specific purposes. [Emphasis added.]

In the narrow, emergency circumstance where “actual revenues for a fiscal period will fall below the revenue estimates on which appropriations for that period were based,” the Governor shall reduce expenditures, but must first receive approval from the House and Senate appropriating committees. Const 1963, art 5, § 20.

The unusual nature of this grant of authority was apparent to the convention delegates, who discussed the proposal during the constitutional convention at some length. See 1 Official Record, Constitutional Convention 1962, pp 1666–1670. The constitutional convention debates can be “illuminating” and may serve to “support” the common understanding of the ratifiers. *Mothering Justice v Attorney Gen*, 515 Mich 328, 354 (2024).

There was debate about the proper process in this “emergency” situation where the budget projections did not match the actual revenues. Delegates expressed concerns with both unilateral, unchecked action of the Governor in deciding what appropriations to cut, see, e.g., 1 Official Record, Constitutional Convention 1962 at 1668 (Statement of Delegate Staiger), and the impracticality of the full involvement of the Legislature in an emergency circumstance, particularly where the “legislature is not in session,” see, e.g., *id.* After some debate, a middle-ground proposal was offered:

This approach would leave the power with the governor to cut expenditures when he sees that the revenues are not meeting expectations but only with the approval of the appropriating committees of the 2 houses of the legislature, so that there is some check on that power. [*Id.* at 1668 (Statement of Delegate Staiger).]⁶

Even in this emergency context, however, one delegate vigorously expressed concern about the “irregular” nature of giving “constitutional status to a

⁶ One delegate endorsed this proposal as it would pair the head of the executive branch with “the appropriating committees which—of the entire body of the legislature—are also most familiar with these financial and fiscal problems.” *Id.* at 1669 (Statement of Delegate Martin).

committee.” *Id.* at 1668 (Statement of Delegate Faxon); see also *id.* (“I don’t know that we have given this status to the other standing committees of the house and senate, and I think that this might be a departure from the tradition of not naming the legislative committees.”). Indeed, Delegate Faxon noted that, “with all the other practice that we have in the constitution with regard to checking the power of the governor or checking the power of the judiciary or checking any power. *You never lodge the check within a select group of the body; you lodge it with the body itself.*” *Id.* at 1669 (emphasis added). Thus, discussion at the Constitutional Convention recognized the unusual nature of identifying and empowering a committee of the Legislature in the Constitution. Yet the delegates decided to do so, but only in a narrow, emergency circumstance.

Crucially, however, even this constitutional exception preserves a feature of bicameralism. Article 5, § 20 requires the approval of the appropriating committees of *both* houses to effectuate a reduction. In contrast, MCL 18.1451a(3) lacks this constitutional symmetry, purporting to authorize a single committee from either house to unilaterally veto work-project designations. This statutory scheme thus creates an even more “irregular” power than the one the delegates cautiously debated, bypassing not only the full legislative body but also the second chamber entirely.

The existence of this aberrational provision in article 5, § 20, is further evidence that MCL 18.1451a(3)—which purports to grant a single committee of a

single house authority to revoke already-appropriated funds—contains an unconstitutional legislative committee veto.

In sum, the Framers of the Michigan Constitution saw fit to empower the Appropriations Committees in one specific emergency circumstance, but in no other. Absent “explicit and unambiguous” terms in the Constitution authorizing an exception from the requirements of bicameralism and presentment, *Chadha*, 462 US at 955, “a committee of the legislature” may not “act[] in an inherently legislative manner without adhering to the enactment and presentment requirements of the constitution,” *Blank*, 462 Mich at 120. As a result, MCL 18.1451a(3)’s grant of veto authority to the Appropriations Committees violates the Constitution.

The unconstitutional legislative committee veto contained in MCL 18.1451a(3) is severable from the remainder of the provision.

Having concluded that the disapproval mechanism in MCL 18.1451a(3) amounts to a legislative committee veto that violates the Michigan Constitution, it is necessary to determine whether this portion of the statute can be severed, leaving the remainder of MCL 18.1451a intact and operative, or whether the invalidation of the legislative committee veto is instead fatal to the statutory provision as a whole. It can.

Michigan law explicitly favors severability:

In the construction of the statutes of this state the following rules shall be observed, unless such construction would be inconsistent with the manifest intent of the legislature, that is to say:

If any portion of an act or the application thereof to any person or circumstances shall be found to be invalid by a court, such invalidity shall not affect the remaining portions or applications of the act which can be given effect without the invalid portion or application, provided such remaining portions are not determined by the court to be inoperable, and to this end acts are declared to be severable. [MCL 8.5.]

This directive is echoed in the Management and Budget Act's own severability clause, which declares the Act's provisions to be severable using nearly identical language. MCL 18.1501 ("If any portion of this act or the application of this act to any person or circumstances shall be found to be invalid by a court, the invalidity shall not affect the remaining portions or applications of this act which can be given effect without the invalid portion or application, if the remaining portions are not determined by the court to be inoperable, and to this end this act is declared to be severable.").

Under these rules, an unconstitutional provision should be excised if the Legislature "would have passed the statute had it been aware" of the infirmity. *In re Request for Advisory Opinion Regarding 2011 PA 38*, 490 Mich 295, 346 (2011) (cleaned up). Here, the intent of MCL 18.1451a is to regulate work-project designations through several independent limitations that remain fully functional without the legislative committee veto:

- Temporal constraints: The State Budget Director must propose designations within 45 days of the close of the fiscal year. MCL 18.1451a(3).
- Substantive criteria: The statute provides specific criteria to be used to define a "work project." MCL 18.1451a(1)(a)–(d).

- Reporting requirements: The Director must keep the Appropriations Committees informed through a yearly report including “a listing of all work project accounts, the balance in each account, the amount of funds that lapsed from any previously designated work projects, and the funds that received these lapses.” MCL 18.1451a(4).

Because these limitations independently serve the legislative goal of fiscal oversight and are operable without the legislative committee veto, it is my conclusion that the Legislature would have passed the statute had it been aware that the legislative committee veto is “infirm” and would be excised from the act. In other words, it is unlikely that the Legislature intended for the entire regulatory framework to fail upon the invalidation of a single oversight limitation.

The Michigan Supreme Court’s decision in *Blank* bolsters this conclusion. That opinion evaluated whether the infirm portion of the APA that violated the separation of powers could be severed. See *Blank*, 462 Mich at 122–124. The provisions that *Blank* determined to be an unconstitutional legislative veto could be severed from the remainder of the statute. *Id.* at 124. The operation and statutory language of the legislative veto in *Blank* mirrors the operation and statutory language of MCL 18.1451a(3). The JCAR had the purported statutory authority to “disapprove[] the proposed rule.” *Blank*, 462 Mich at 109–110, quoting MCL 24.245(9). Here, the Appropriations Committees have the purported statutory authority to “disapprove[]” the “appropriations proposed to be designated as work projects.” MCL 18.1451a(3). Given this similarity, *Blank* strongly counsels in favor of severance.

In sum, while the disapproval mechanism in MCL 18.1451a(3) amounts to an unconstitutional legislative committee veto that violates the Constitution, it is not fatal to the statute as a whole. Because the remaining provisions regarding temporal limits, substantive criteria, and reporting requirements are independently operable and further the Legislature's intent for fiscal oversight, the invalid portion is legally severable. Under the mandates of MCL 8.5 and MCL 18.1501, and consistent with the Michigan Supreme Court's decision in *Blank*, the legislative committee veto should be excised, leaving the balance of the work-project designation framework intact and enforceable.

CONCLUSION

It is my opinion, therefore, that the disapproval mechanism in MCL 18.1451a(3) amounts to a legislative committee veto that violates Article 3, § 2 of the Michigan Constitution, which requires the separation of powers among the three branches of government. Similarly, the legislative committee veto violates Article 4, § 33, which requires legislation to be completed consistent with the bicameralism and presentment requirements set forth in the Michigan Constitution. The legislative committee veto, however, may be severed from MCL 18.1451a(3), leaving the balance of the work-project designation framework intact and enforceable.



DANA NESSEL
Attorney General

EXHIBIT F

From: Guarrant, Kyle (DTMB) [REDACTED]
Sent: Wednesday, January 7, 2026 11:25 AM
To: Budget Officers Distribution List [REDACTED]
Cc: Benson, Jocelyn (MDOS) [REDACTED]; Boring, Tim (MDARD) [REDACTED]; Bowen, Scott (DNR) [REDACTED]; Brown, Marlon (LARA) [REDACTED]; Corbin, Susan (LEO) [REDACTED]; Eubanks, Rachael (TREASURY) [REDACTED]; Flood, Jen (DTMB) [REDACTED]; Fox, Anita (DIFS) [REDACTED]; Froehlich, Joseph (MSL) [REDACTED]; Gnodtke, John (MCSC) [REDACTED]; Grady, James (MSP) [REDACTED]; Hertel, Elizabeth (DHHS) [REDACTED]; Johnson, John (MDCR) [REDACTED]; Lange, Michelle (DTMB) [REDACTED]; Maleyko, Glenn (MDE) [REDACTED]; Nessel, Dana (AG) [REDACTED]; Rogers, Paul (DMVA) [REDACTED]; Roos, Phillip (EGLE) [REDACTED]; Walker-Griffea, Beverly (MiLEAP) [REDACTED]; Washington, Heidi E. (MDOC) [REDACTED]; Wieferich, Brad [REDACTED]; Williams, Henry (MGCB) [REDACTED]; Anderson, Christina [REDACTED]; Angerer, Kathleen (MDARD) [REDACTED]; Beckhorn, Stephanie [REDACTED]; Blodgett, Laura (DHHS) [REDACTED]; Boeskool, Travis (EGLE) [REDACTED]; Braeutigam, Jon (Treasury) [REDACTED]; Brigadier General Daniel Kramer II [REDACTED]; Brimacombe, Aimee (MSP) [REDACTED]; Brunner, Gregg (MDOT) [REDACTED]; Buhs, Caleb (DTMB) [REDACTED]; Bush, Jeremy I (MDOC) [REDACTED]; Campbell, Renee (DIFS) [REDACTED]; Carnell, Sue (MDE) [REDACTED]; Castro, Melissa (MSP) [REDACTED]; Chapman, Delsa (MDE) [REDACTED]; Christin Armstrong (MEDC) [REDACTED]; Egan, Sean (LEO) [REDACTED]; Epkey, Amy (DHHS) [REDACTED]; Garcia, Joseph (DIFS) [REDACTED]; Golzynski, Diane (MDE) [REDACTED]; Grant, Corey (TREASURY) [REDACTED]; Groen, Meghan (DHHS) [REDACTED]; Guarrant, Kyle (DTMB) [REDACTED]; Hamp, Julie M. (MDOC) [REDACTED]; Harmala, Michele (MDE) [REDACTED]; Haywood, Dwayne A. (DHHS) [REDACTED]; Ingersoll, Jean (DHHS) [REDACTED]; Kale, Kavita (TREASURY) [REDACTED]; Keatley, Aaron (EGLE) [REDACTED]; Knezek, David (DHHS) [REDACTED]; Krumm, Michael (MSP) [REDACTED]; Laidlaw, Emily (MiLEAP) [REDACTED]; Larson, Ann (EGLE) [REDACTED]; Lott, Shannon (DNR) [REDACTED]; Luetzow, Aaron (DIFS) [REDACTED]; LyonCallo, Sarah (DHHS) [REDACTED]; Manning, Peter (AG) [REDACTED]; Marlan, Russell L. (MDOC) [REDACTED]; Mellos, George (DHHS) [REDACTED]; Mester, Laura (MDOT) [REDACTED]; Nagel, Beth (DHHS) [REDACTED]; Palmer, Jason (UIA) [REDACTED]; Patterson, Jonathan (MCSC) [REDACTED]; Pendleton, Courtney (LARA) [REDACTED]; Phillips, Kristin (DNR) [REDACTED]; Potchen, Joseph (AG) [REDACTED]; Ramaswamy, Sudhakar (DHHS) [REDACTED]; Rice, Michael (MDE) [REDACTED]; Rick, Matthew (DHHS) [REDACTED]; Sampson, Stacie (DHHS) [REDACTED]; Sandoval, Adam (LARA) [REDACTED]; Schmittdiel, Cheryl (OSE) [REDACTED]; Slaughter, Terri (MDOT) [REDACTED]; Smith, Kevin (TREASURY) [REDACTED]; Sosinski, David (MSP) [REDACTED]; Starling, Demetrius (DHHS) [REDACTED]; Trepkoski, Jill (TREASURY) [REDACTED]; West, Amanda (TREASURY) [REDACTED]; Woolridge, Kimberly (MDCR) [REDACTED]; Alagna, Tina (MGCB) [REDACTED]; Alicia Moon [REDACTED]; Apostol, Christine (MGCB) [REDACTED]; Beltzer, Kristin (LARA) [REDACTED]; Butler, Todd (DMVA) [REDACTED]; Byrne, Michael (LARA) [REDACTED]; Griffin, William (MSL) [REDACTED]; Hirst, Laura (OAG) [REDACTED]; Klont, Timothy (MSHDA) [REDACTED]; Lewis, Kenyatta (DTMB) [REDACTED]; Murley, David (MGCB) [REDACTED]; Schulte, Carla (MGCB) [REDACTED]; Steinkamp, Kurt (MGCB) [REDACTED]

RECEIVED by MCCOC 1/9/2026 2:13:19 PM

[REDACTED]; Thomas Boyd [REDACTED]

Subject: Work Project Update

Agency Budget
Directors

I am reaching out to confirm that we concur with the opinion issued by the Attorney General declaring that the House Appropriation Committee's recent vote to disapprove work projects is unconstitutional.

AG Opinion Link: [Anthony Request for AG Opinion 12 16 2025](#)

Appropriation codes for new non-statutory work projects included in the Nov. 14 letter have been activated to allow departments to begin spending in FY 2026. Departments will need to apply an override to process expenditures in the \$0 budgets until authorization is transferred to the work projects. It is also the department's responsibility to ensure work project expenditures do not exceed remaining authorization in operating accounts and/or specified balances, if any, in the work project letter.

Validating and Loading New Work Project Balances

As part of the normal book close process, the following steps need to be completed in order to load work project authorization balances:

- Departments validate all operating appropriations (where a new work project will be created) are closed and the chief accountant or CFO sends an email certifying this to SBOBudgetaryTransactions@michigan.gov and your OFM accounting liaison.
- OFM provides a spreadsheet to departments to capture anticipated operating account balances that will move to the work projects. Specific instructions will be included in the spreadsheet. Departments will populate the spreadsheet and send back to their OFM accounting liaison for verification.
- OFM sends amounts to SBOBudgetaryTransactions@michigan.gov. SBO will interface balances to SIGMA Financial. *A follow up email with a budget report showing balances being interfaced will be sent to budget staff and chief accountants once this task is complete.*

If you have questions related to the establishment or approval of work projects, please contact your budget analyst. If you have questions regarding the encumbrances or payables related to work projects, please contact your OFM accounting liaison.

Sincerely,
Kyle

Kyle Guerrant
Deputy State Budget Director

RECEIVED by MCCOC 1/9/2026 2:13:19 PM

State Budget Office
Romney Building 6th Floor
Guerrantk1@michigan.gov
c: (517) 897-6831

Twitter: <https://twitter.com/kguerrant/>



Please note: my working hours may be different than your regular working hours. Please do not feel obligated to respond outside of your regular working hours unless otherwise requested.

--

CONFIDENTIALITY NOTICE: This email communication may contain private, confidential, or legally privileged information intended for the sole use of the designated and/or duly authorized recipient(s). If you are not the intended recipient or have received this email in error, please notify the sender immediately by email and permanently delete all copies of this email including all attachments without reading them.

RECEIVED by MCOC 1/9/2026 2:13:19 PM

TrueFiling Case Initiation - Summons and Complaint

Case Title:

MICHIGAN HOUSE OF REPRESENTATIVES

Case Type:

MB

Case Description:

Mandamus: All actions for mandamus against state officials and departments

Party 1 (Plaintiff)

Business: Michigan House of Representatives **Phone:**

Address: 100 North Capitol Avenue

City: Lansing **State:** Michigan **Zip:** 48909

Attorney(s) for Party 1

Name: Sean T.H. Dutton **Bar Number:** P77515 **(Lead Counsel)**

Party 2 (Defendant)

Business: Dept of Technology, Management & Budget **Phone:** (517) 241-5545

Address: 320 S. Walnut St Lewis Cass Bldg 2nd Floor

City: Lansing **State:** Michigan **Zip:** 48909

Party is Pro Se

Party 3 (Defendant)

Business: Michelle Lange, Director of Dept of Tech **Phone:** (517) 241-5545

Address: 320 S. Walnut St Lewis Cass Bldg 2nd Floor

City: Lansing **State:** Michigan **Zip:** 48909

Party is Pro Se

Party 4 (Defendant)

Business: State Budge Office **Phone:** (517) 373-8883

Address: 111 S. Capitol Avenue #6

City: Lansing **State:** Michigan **Zip:** 48933

Party is Pro Se

Party 5 (Defendant)

Business: Director Jen Flood, State Budget Office **Phone:** (517) 373-8883

Address: 111 S. Capitol Avenue #6

City: Lansing **State:** Michigan **Zip:** 48933

Party is Pro Se

Party 6 (Defendant)

Business: Dept of Labor & Economic Opportunity **Phone:** (517) 284-7800

Address: 105 W. Allegan Street

City: Lansing **State:** Michigan **Zip:** 48933

Party is Pro Se

Party 7 (Defendant)

Business: Director Susan Corbin, Dept of Labor & E **Phone:** (517) 284-7800

Address: 105 W. Allegan Street

City: Lansing **State:** Michigan **Zip:** 48933

Party is Pro Se

Party 8 (Defendant)

Business: Department of Treasury **Phone:** (517) 373-3223

Address: 430 W. Allegan Street

City: Lansing **State:** Michigan **Zip:** 48933

Party is Pro Se

Party 9 (Defendant)

Business: Director Rachael Eubanks, Dept of Treasu **Phone:** (517) 373-3223

Address: 430 W. Allegan Street

City: Lansing **State:** Michigan **Zip:** 48933

Party is Pro Se

Party 10 (Defendant)

Business: Department of Corrections **Phone:** (517) 335-2243

Address: 206 E. Michigan Avenue

City: Lansing **State:** Michigan **Zip:** 48933

Party is Pro Se

Party 11 (Defendant)

Business: Heidi Washington, Director Dept. of Corr **Phone:** (517) 335-2243

Address: 206 E. Michigan Avenue

City: Lansing **State:** Michigan **Zip:** 48933

Party is Pro Se

Party 12 (Defendant)

Business: Department of Education **Phone:** (833) 633-5788

Address: 608 W. Allegan

City: Lansing **State:** Michigan **Zip:** 48933

Party is Pro Se

Party 13 (Defendant)

Business: Director Dr. Glenn Maleyko, Dept of Educ **Phone:** (833) 633-5788

Address: 608 W. Allegan

City: Lansing **State:** Michigan **Zip:** 48933

Party is Pro Se

Party 14 (Defendant)

Business: Department of Environment, Great Lakes & **Phone:** (800) 662-9278

Address: 525 W. Allegan St.

City: Lansing **State:** Michigan **Zip:** 48909

Party is Pro Se

Party 15 (Defendant)

Business: Director Phillip Roos Dept of Environmen **Phone:** (800) 662-9278

Address: 525 W. Allegan Street

City: Lansing **State:** Michigan **Zip:** 48909

Party is Pro Se

Party 16 (Defendant)

Business: Department of Licensing & Regulatory Aff **Phone:** (517) 335-9700

Address: 611 W. Ottawa St.

City: Lansing **State:** Michigan **Zip:** 48933

Party is Pro Se

Party 17 (Defendant)

Business: Director Marlon Brown, Dept of Licensing **Phone:** (517) 335-9700

Address: 611 W. Ottawa St.

City: Lansing **State:** Michigan **Zip:** 48933

Party is Pro Se

Party 18 (Defendant)

Business: Department of Health and Human Services **Phone:** (517) 241-3740

Address: 333 S. Grand Avenue

City: Lansing **State:** Michigan **Zip:** 48909

Party is Pro Se

Party 19 (Defendant)

Business: Director Elizabeth Hertel, Dept of Healt **Phone:** (517) 241-3740

Address: 333 S. Grand Avenue

City: Lansing **State:** Michigan **Zip:** 48909

Party is Pro Se

Party 20 (Defendant)

Business: Department of State **Phone:** (888) 767-6424

Address: 430 W. Allegan Street Richard H. Austin Bldg - 4th Floor

City: Lansing **State:** Michigan **Zip:** 48918

Party is Pro Se

Party 21 (Defendant)

Business: Secretary Jocelyn Benson, Dept of State **Phone:** (888) 767-6424

Address: 430 W. Allegan Street Richard H. Austin Bldg - 4th Floor

City: Lansing **State:** Michigan **Zip:** 48918

Party is Pro Se

Party 22 (Defendant)

Business: Department of Transportation **Phone:** (517) 241-2400

Address: 425 W. Ottawa Street State Transportation Building

City: Lansing **State:** Michigan **Zip:** 48909

Party is Pro Se

Party 23 (Defendant)

Business: Director Bradley Wieferich, Dept of Tran **Phone:** (517) 241-2400

Address: 425 W. Ottawa St

City: Lansing **State:** Michigan **Zip:** 48909

Party is Pro Se

Party 24 (Defendant)

Business: Department of Natural Resources **Phone:** (517) 284-6367

Address: 525 W. Allegan Street

City: Lansing **State:** Michigan **Zip:** 48933

Party is Pro Se

Party 25 (Defendant)

Business: Director Scott Bowen, Dept of Natural Re **Phone:** (517) 284-6367

Address: 525 W. Allegan St

City: Lansing **State:** Michigan **Zip:** 48933

Party is Pro Se

Party 26 (Defendant)

Business: Michigan Strategic Fund **Phone:** (888) 522-0103

Address: 300 N. Washington Square

City: Lansing **State:** Michigan **Zip:** 48913

Party is Pro Se

Party 27 (Defendant)

Business: Michigan Economic Development Corporatio **Phone:** (888) 522-0103

Address: 300 N. Washington Square

City: Lansing **State:** Michigan **Zip:** 48913

Party is Pro Se

Party 28 (Defendant)

Business: CEO Quentin Messer, Michigan Economic De **Phone:** (888) 522-0103

Address: 300 N. Washington Square

City: Lansing **State:** Michigan **Zip:** 48913

Party is Pro Se

Party 29 (Defendant)

Business: Michigan Gaming Control Board **Phone:** (313) 456-4100

Address: 3062 W. Grand Boulevard, Suite L-700

City: Detroit **State:** Michigan **Zip:** 48202

Party is Pro Se

Party 30 (Defendant)

Business: Director Henry Williams, Michigan Gaming **Phone:** (313) 456-4100

Address: 3062 W. Grand Boulevard, Suite L-700

City: Detroit **State:** Michigan **Zip:** 48202

Party is Pro Se

Party 31 (Defendant)

Business: Bureau of State Lottery **Phone:** (844) 917-6325

Address: 101 E. Hillsdale Street

City: Lansing **State:** Michigan **Zip:** 48909

Party is Pro Se

Party 32 (Defendant)

Business: Acting Commissioner Joseph Froehlich **Phone:** (844) 917-6325

Address: 101 E. Hillsdale Street

City: Lansing **State:** Michigan **Zip:** 48909

Party is Pro Se

STATE OF MICHIGAN
COURT OF CLAIMS

Bundle Cover Sheet

Lower Court:	L Ct No.:	COC No.: TEMP-W80X8OX7
Case Title: MICHIGAN HOUSE OF REPRESENTATIVES v. DEPT OF TECHNOLOGY, MANAGE		
Priority: NONE	Filing Option: File Only	

Filer Information

<u>Filer</u> Kimberly Matis 280 North Old Woodward Avenue Birmingham, MI 48009 kmatis@khvpf.com	<u>Attorney</u> Sean Dutton, P77515(MI) 280 N. Old Woodward Ave., Ste. 400 Birmingham, MI 48009 sdutton@khvpf.com
---	---

Filing Summary

Filing Type	Filing Name	Fee
Other	Summonses	\$0.00
Summons and Complaint	Verified Complaint & Exhibits	\$150.00
	eFiling System Fee:	\$25.00
Motion (filed with another document requiring a fee)	Motion to Exceed Page Limit	\$0.00
Motion (filed with another document requiring a fee)	Motion for TRO and Preliminary Injunction	\$0.00
	NON-REFUNDABLE Automated Payment Service Fee:	\$5.25
	Total:	\$180.25

Alternate Payment Reason: None

The document(s) listed above were electronically filed with the Michigan Court of Claims.

TEMP-W80X8OX7-52626255

RECEIVED by MCOC 1/9/2026 2:13:19 PM