



July 17, 2026

Staff report
Michiganders for Money Out of Politics

Sponsor: Michiganders for Money Out of Politics, 23133 Woodward Ave., # 196, Ferndale, MI 48220.

Date of filing: May 27, 2026

Number of valid signatures required: 356,958 signatures.

Total filing: 561,282 signatures.¹

Signature sample:

Total number of sampled signatures		1,000
Total number of signatures determined to be invalid	Less:	201
Duplicate (voter signed petition multiple times)	Less:	2
Invalid signature (signature is omitted or does not sufficiently agree with the signature on file)	Less:	67
Signer not registered to vote	Less:	107
Invalid address (address is blank, missing house number or street name, or PO Box listed)	Less:	3
Invalid city or township (no city or township by that name located within the county listed at the top of the petition sheet or the city/township field was left blank)	Less:	7
Invalid date (signature is dated before the first date signatures may be circulated; signer's signature is dated after the circulator dated their signature; date is incomplete, illegible, or missing)	Less:	3

¹ The total number of signatures filed represents a cushion of 57.2% over the minimum number required. The sponsor needed to attain a signature validity rate of at least 63.6% for staff to recommend certification of the petition (i.e., 636/1,000). The validity rate found in this sample is 65.7%.

Circulator information missing (failure to include the circulator name or complete residential address; circulator did not sign or date petition)	Less:	3
Illegible (unable to read enough information provided by the signer to identify the signer)	Less:	4
Miscellaneous errors not provided above (voter is registered in city/township indicated but the voter's address is not located in the county in the petition heading) ²	Less:	5
Total number of valid signatures in sample before challenges		799

Staff's review of Michiganders for Money Out of Politics' (MMOP) signature sample identified 201 invalid signatures and 799 valid signatures, prior to the review of challenged signatures.

Signature challenge: Protect MI Free Speech and James Holcomb (collectively, PMFS) filed a challenge to specific signatures in the sample, alleging that 432 of MMOP's sampled petition signatures should be rejected because the signatures included all of the following:

- Apparent potential forgeries
- Extensive signature errors
- A high number of duplicate signatures
- Signatures from individuals not registered to vote
- Circulator errors
- Numerous address and jurisdictional issues
- Signatures from dead people

In sum, PMFS challenged 432 sampled signatures.

Following staff's review, MMOP was left with a "cushion" of 163 signatures—the number of signatures MMOP had in excess of the number needed to appear on the ballot. Because the number of signatures challenged exceeded MMOP's cushion, staff processed the challenge as described in the following table. The table shows the challenges that were accepted by staff, thereby reducing the number of valid signatures; it does not include the challenges that overlapped with the signatures already found invalid by staff during the initial review or challenges that were reviewed and rejected.

² MC applies when a signature is invalid for a reason not listed in the approved codes. Here, the code applies when, for example, the voter lives in Tekonsha, which is located in both Calhoun and Branch County. While the voter is registered in the portion that lies within Branch County, they signed a Calhoun County petition sheet. In this instance, the signature is invalid because only registered voters of the county in the heading may sign that petition sheet. However, the signature does not neatly fit into the NR error code (which applies when the voter is not registered in the city or township indicated) or the IC error code (which applies when the city or township indicated is not located in the county in the heading). This error is marked as MC for this petition cycle but following this cycle staff recommends a new code to account for the error.

Total number of valid signatures in sample before challenges		799
Duplicate (voter signed petition multiple times)	<i>Less:</i>	102
Invalid signature (signature is omitted or does not sufficiently agree with the signature on file)	<i>Less:</i>	7
Signer not registered to vote	<i>Less:</i>	11
Invalid date (signature is dated before the first date signatures may be circulated; signer's signature is dated after the circulator dated their signature; date is incomplete, illegible, or missing)	<i>Less:</i>	2
Missing required element (missing a required element, e.g., warning cut off when printed, illegible words)	<i>Less:</i>	2
Circulator information missing (failure to include the circulator name or complete residential address; circulator did not sign or date petition)	<i>Less:</i>	18
Total valid after processing challenge		657

The challenge is organized by the type of error that is the basis of the challenge and signatures challenged for that reason are documented in 14 tables.³ While PMFS challenged 432 *signatures* in the 1000-signature sample, most of the signatures were challenged for multiple reasons, resulting in 793 individual challenges. Staff reviewed each sampled signature for each of the challenged reasons. This report will address each challenge category in the order of the tables presented in the challenge.

Table 1: Illegible entry errors. This table identifies 15 signer lines PMFS alleges are illegible (issue code IL). According to PMFS' complaint, "A line is illegible if the Bureau is unable to read enough information by the signer to identify the signer." While the petition manual does not refer to the Bureau, this description otherwise mirrors the manual.⁴ In sum, staff did not accept any IL challenges, rejected 6, and identified the 9 that overlapped staff's determination.

Table 2: Duplicate signatures errors. This table identifies 148 signers PMFS argues signed the petition more than once (DUP). According to the procedure approved by the Board, in order to determine sufficiency staff confines its review to the 1,000 signatures within the sample drawn from the universe. However, when after reviewing a challenge it is determined that a signature in the sample has a duplicate signature in the universe (including outside the sample), and the sampled signature and at least one duplicate elsewhere in the universe are otherwise valid (i.e. not invalid for another reason), the sampled signature is then rendered invalid as a duplicate. (If the duplicate signature is invalid for

³ The tables are numbered 1-13, but there is a table 4.1 and a table 4.2.

⁴ [Petition Manual: Statewide Initiative, Referendum, and Constitutional Amendment Petitions](#), Appendix D: Signature Coding.

another reason, the sampled signature is not invalid as a DUP.)⁵ In sum, staff accepted 102 DUP challenges, rejected 12 (generally, because the alleged duplicate was invalid for another reason, leaving the sampled signature valid), and identified 33 that overlapped staff's determination. One additional challenge was accepted as a CIRC error also identified in the challenge.

Table 3: Invalid signature errors. This table identifies 30 signatures that are challenged as either omitted or not agreeing with the signature on file (IS). It is unclear on what PMFS based its allegation that the signatures did not match, as PMFS does not have access to the Qualified Voter File (QVF). Staff compared each signature against the applicable signature in the QVF for a second time, following its initial review. In sum, staff accepted 1 IS challenge, rejected 10, and identified 18 that overlapped staff's determination. One additional challenge was accepted as a DUP error also identified in the challenge.

Table 4.1 and 4.2: Non-registered voters. These tables identify 146 signers that PMFS alleges are not registered to vote (NR).

Table 4.2 specifically identifies signers PMFS alleges are not registered to vote because the address written on the petition is "fabricated" and does not represent a real address within the same city or township listed on the petition. PMFS's argument seems to be that the Petition Manual's instruction that a signer is considered registered if they are registered at another address within the city or township listed on the petition should not apply when a voter writes on the petition an address that does not exist.⁶ Exhibit E attached to the challenge includes Geographic Information System (GIS) mapping images, or when GIS mapping was not available, Google Maps, to support the assertions that identified addresses do not exist.

In the memo on petition code changes drafted by staff and approved by the Board at the March 20, 2023, meeting, the Board eliminated the previous "RAT" code, which applied when the signer "was not registered at the address listed in the petition, but was registered at a different address within the jurisdiction." While the RAT code was eliminated, the Board approved⁷ the following procedure:

If the voter cannot be found at the address listed on the petition, staff will continue to verify whether the individual is registered at a different address within the jurisdiction. This process will continue to be followed **whether or not the address provided is a valid address**. Where such determinations are disputed or challenged, staff will continue to provide comments explaining that the signer is registered within the jurisdiction and the question of whether the signer is registered at the address listed is irrelevant. (Emphasis added).

⁵ In *Taxpayers United for Assessment Cuts v Austin*, 994 F2d 291, 297-299 (1993), the plaintiffs argued that Michigan's procedures violated their Fourteenth Amendment due process and equal protection rights for various reasons. Specifically, plaintiffs argued "the practice in Michigan of excluding the signatures of any person who has signed the petition twice is irrational," and argued that the Board's practice of using both a system of random sampling and "technical checks" produced irrational results. *Id.* at 299. The court disagreed, holding that excluding duplicative signatures was "rationally related to Michigan's interest in protecting against fraud in its initiative system." The court further held that using both technical checks and random sampling was rational and "may even make the random sampling procedure more accurate." *Id.*

⁶ [Petition Manual: Statewide Initiative, Referendum, and Constitutional Amendment Petitions](#), Appendix D: Signature Coding.

⁷ See [March 20, 2023 SIGNED BSC Draft Minutes](#), Board approval of changes to petition validity codes and changes to procedures described in the Petition Manual. Memo attached as Attachment 1 to this staff report.

In Exhibit E, PMFS challenged 23 sampled signatures as having addresses that are not real.⁸ Staff did not accept any NR challenges based on that reason. Staff rejected 10 in accordance with Board policy as described above, and identified 11 that overlapped staff's determination. Two additional challenges were accepted as a DUP error (1) and as an IS error (1) also identified in the challenge.

In sum, staff accepted 3 NR challenges, rejected 33, and identified 101 that overlapped staff's determination. Nine additional challenges were accepted as DUP errors (6) and IS errors (3) also identified in the challenge.

Table 5: Address and jurisdictional errors. This table identifies 106 signatures PMFS alleges are invalid for one or several address or jurisdictional errors. The issue code IA applies when the address is blank, missing house number or street name, or a PO Box is listed. IC applies when there is no city or township by that name located within the county listed at the top or the city or township field was left blank. NC applies when a nonexistent county is listed. OD applies when the address given is located within the city or township listed but outside the electoral district for the office sought.

Many of these signatures were challenged, it appears, because the writing was messy or there was a misspelling or incidental omission. For instance, signatures were challenged because the signer indicated their full address but did not indicate "St." following the house number and street name, as in "123 Main" instead of "123 Main St." Another challenge alleged was misspelling the name of a city, township, or county, which the challengers indicated resulted in a "Nonexistent county" (NC) code, or an "invalid city" (IC) code. For instance, where a circulator wrote a misspelling such as "Jackson" or "Genessee" in the heading, that does not invalidate every signature on the sheet, including the sampled signature.⁹ Likewise, where a signer wrote a misspelling such as "Southfied" as their city, that does not invalidate the signature.

Additionally, PMFS challenged signatures based on an error code that was removed in 2023. While PMFS indicated in 10 explanations, "Signer wrote two separate jurisdictions in the "City or Township" field, using an IC error code, that description mirrors the defunct "DUAL" code. As described in the 2023 code update memo,

The "DUAL" code has been used to reject signatures in instances where a signer wrote the names of two or more jurisdictions in the space for city or township. Often, this occurs when a signer writes their city/township and county in the space for city/township . . . Prior to the use of current technology, it was practically impossible to determine which jurisdiction was applicable so that the Bureau could contact the various appropriate jurisdictions to validate signatures. Now that the QVF allows staff access to search statewide for records which can be used to verify whether signers properly entered the correct jurisdiction, staff believes it is no longer necessary to reject signatures with such "dual" entries. *See Hagg v. Board of State Canvassers*, Case No. 36579, Mich. Ct. App., June 6, 2022.

The following are examples of the challenged issue on petition sheets 10767, 35073, and 83070.

⁸ All 23 sampled signatures challenged for this reason were part of the NR signature challenge tables 4.1 and 4.2.

⁹ "Misspelled county is not "NC." [Petition Manual: Statewide Initiative, Referendum, and Constitutional Amendment Petitions](#), pg. 40.

CITY OR TOWNSHIP	CITY OR TOWNSHIP	CITY OR TOWNSHIP
Hawthorn Twp. (Wilkes Co.)	Macomb, Sterling Heights	Lansing, Ingham

PMFS alleged the following address or jurisdictional errors for the 105 signatures: 54 IC, 77 IA, 16 NC, and 10 OD,¹⁰ for a total of 157 individual challenge reasons. Additionally, PMFS alleged approximately 80 MC¹¹ errors in Table 5. In sum, of the 157 IC, IA, NC, and OD challenges, staff did not accept any challenges, rejected 47, and identified 80 that overlapped staff's determination. Thirty additional challenges were accepted as DUP errors (9), NR errors (18), and IS errors (3) also identified in the challenge. Because MC was included in several different tables, and the numbers in those tables do not match the numbers in Exhibit B, which PMFS indicates is its "complete table of challenges," staff is unable to separate MC into its various categories, but a full excel sheet of staff's final coding has been provided to MMOP and PMFS.

Table 6: Date errors. This table identifies 16 signatures PMFS alleges are invalid because of date-related errors, including signatures dated after the date the circulator dated the circulator certificate, and signatures with missing, illegible, or incomplete dates (DATE). The rejected challenges generally involved dates that were corrected or written with messy handwriting. In sum, staff accepted 2 DATE challenges, rejected 7, and identified 6 that overlapped staff's determination. One additional challenge was accepted as a DUP error also identified in the challenge.

Table 7: Form errors. This table identifies 6 petition *sheets* PMFS alleges should be invalidated for form errors, including MRE, DMG, and HEAD errors. All 6 petition sheets are challenged for MRE errors, 4 are also challenged for DMG errors, and one includes an alleged HEAD error in addition to the MRE and DMG error. MRE applies when a petition sheet is missing a required element. DMG applies for damaged, mutilated, or torn sheets that are damaged in a way that interferes with the presence of the mandatory elements (heading, warning statements, circulator certificate, signer entries). HEAD refers to required petition heading entries and formatting.

After the scanned front sheets of all petition sheets in the universe and scanned copies of the sample were provided to requesters, PMFS requested to review the back of each physical petition sheet in person. At that time, the physical sample sheets were not yet available because staff had not yet manually retrieved them. Manually retrieving the physical sample sheets is a time-intensive process that takes significantly longer than electronically drawing the sample from the scanned sheets. Staff began retrieving the physical sheets and providing PMFS access to the physical sheets, on a rolling basis as they became available.

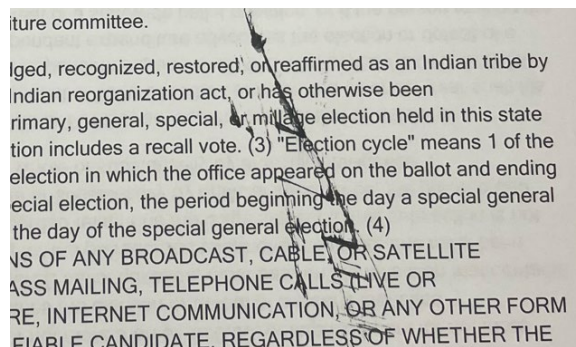
At the time of filing the challenge, PMFS had reviewed 140 of the 994 sheets in the sample and alleged 6 form errors in the challenge (2 were accepted). Based on that, PMFS alleges 18 additional form errors on the remaining sheets, and purports to challenge all remaining sampled sheets for that reason. Staff cannot review speculative errors based on this type of projection.

¹⁰ The OD code is not possible for a statewide ballot question because OD applies when a signer is "out of district" and the district in question for a statewide ballot question is the state.

¹¹ PMFS' Table 5 lists 80 MC errors but Exhibit B shows 156 MC errors in its "general" MC column and 60 in its "Fraud (MC)" column.

After the challenge deadline, staff continued to provide PMFS with access to the physical sheets on a rolling basis. All physical sheets were available to PMFS as of July 15. Staff did review the back of each physical sheet for form errors and did not identify any other than those identified in the PMFS challenge. Although PMFS could not incorporate review of all physical sheets in its challenge, PMFS may incorporate any further arguments in their additional materials submitted to the board, which can be submitted until 48 hours before the Board meets on July 24, 2026. R 168.846.

Staff reviewed each physical sheet challenged. Petition sheet 22485 displayed smudged ink that obscured certain letters in the ballot question on the back of the petition and the MRE challenge was accepted. The sheet was not damaged or mutilated, so the DMG challenge was rejected. The following is an image of the accepted MRE error on petition sheet 22485:



Staff also accepted the MRE challenge to petition sheet 56650 because ink obscured some of the letters in the required circulator certificate warning. The following is an image of the MRE error on petition sheet 56650:

A photograph of a circulator certificate form for petition sheet 56650. The form contains the following text and handwritten entries: "CIRCULATOR - Do not sign or date certificate until after circulating petition.", "(Signature of Circulator)" with a signature, "(Date)" with a date, "(Printed Name of Circulator)" with "Christine McGovern", "(Complete Residence Address (Street and Number or Rural Route)) Do not enter a post office box" with "11457 McDaniel St.", "(City or Township, State, Zip Code)" with "Hamtramck, MI 48212", and "(County of Registration, if Registered to Vote, of a Circulator who is not a Resident of Michigan)" with "Wayne". There is a large, dark, smudged ink mark on the right side of the form.

The rejected challenges did not have damage, heading errors, or MRE errors. Rather, any scribbling, ink, or wear on the page that was present did not obscure any required elements.

In sum, staff accepted 2 form-related challenges, rejected 3, and identified 1 that overlapped with staff's determination.

Table 8: Circulator errors. This table identifies 54 signatures PMFS alleges must be invalidated because of circulator errors (CIRC). PMFS alleges 3 main types of circulator errors. First, PMFS alleges several sheets include circulator certificates that appear to have been dated prior to circulating or that have missing, invalid, or illegible dates. Second, PMFS identifies several circulators who did not identify their

city or township in the circulator certificate in violation of statute as interpreted by *Wickman*.¹² Third, PMFS identifies circulators who failed to include their state and/or zip code in the circulator certificate.

The first basis for the circulator challenges alleged by PMFS appears to assume that corrections to the circulator certificate are not permitted. The challenge describes these errors by stating that the circulator “appears to have dated the sheet prior to circulating.” PMFS does not explain the basis for this conclusion, but staff understands it to be because the circulator crossed out or corrected the date in the circulator certificate. However, corrections and cross outs are permitted and are not considered errors.

The second basis alleged by PMFS is failure of the circulator to identify their city or township in the circulator certificate in violation of statute as interpreted by *Wickman*. Staff accepted 17 challenges on this basis. The other accepted circulator challenge was due to a circulator date of 8/13/2026, a date that has not yet occurred and so cannot be correct. Staff rejected the challenges to out-of-state circulators who listed addresses with an “unincorporated place.” *Wickman* did not consider out-of-state circulators, and states do not uniformly organize their jurisdictions into cities, townships, and villages in the same way that Michigan’s municipalities are organized. Additionally, the challenge does not provide any information identifying the proper city or township that the out-of-state circulators should have included instead of the “unincorporated place” listed in the circulator certificate. Without more information, staff could not determine whether the out-of-state circulator addresses violated statute as interpreted by *Wickman*.¹³

Finally, in regard to the third reason for the circulator challenges, staff has already rejected circulator challenges based on the failure to include the state and/or zip code in the circulator certificate because omission of the state or both the state and the zip code does not violate the requirements of MCL 168.544c. MCL 168.544c(2) specifically states that the failure of the circulator to enter a zip code or to enter a correct zip code does not affect the validity of the signature. Additionally, a Michigan-based circulator’s failure to indicate the state of Michigan on the circulator certificate does not affect the validity of the signature because when considered in the context of the inclusion of a city (and sometimes also a county) that is within the state and an unchecked out-of-state circulator box, it is clear that the circulator is located in Michigan. All of the challenged circulators were Michigan-based.¹⁴ See Staff Report on Philip Tanis, May 14, 2026.

In sum, staff accepted 18 CIRC challenges, rejected 17, and identified 10 that overlapped with staff’s determination. Nine additional challenges were accepted as DUP errors (6), a DATE error (1), an MRE error (1), and an IS error (1) also identified in the challenge.

¹² *Wickman v Norway Twp Clerk*, published opinion of the Michigan Court of Appeals, issued on July 18, 2024, docket number 367743. (The official reporter citation has not yet been assigned). See also *Baslock v Twp Clerk Lipskey*, unpublished per curiam opinion of the Michigan Court of Appeals, issued June 5, 2026 (Docket No. 376557), p 2 (applying *Wickman* and stating that “a circulator’s failure to identify their city or township on the petition renders the signatures on the petition invalid and uncountable,” and “it is not sufficient for a circulator to provide a postal address”).

¹³ Six CIRC challenges to out-of-state circulators were based on violation of the statute as interpreted by *Wickman*. One of the signatures that was challenged on that basis was also challenged as MC and that challenge was accepted resulting in the signature being disqualified as IS. If staff had accepted the CIRC challenges to out-of-state circulators on the basis of *Wickman*, 5 additional signatures would have been invalidated.

¹⁴ The Michigan-based circulator certificates included the following information: Sheet 38827 included Detroit and Wayne; sheet 45767 included Detroit; and sheet 66173 included Southfield and Oakland.

Table 9: Signatures from dead persons. This table identifies 10 signatures allegedly signed by individuals who were deceased at the time of signing. As PMFS acknowledged, none of the 10 signatures challenged for this reason appear in the sample of 1,000 signatures; rather, they appear in the universe of 561,282 signatures. Under policies approved by the Board, only signatures in the sample are considered when determining sufficiency.¹⁵

Table 10: Circulators with dead signers. This table identifies the names of all of the circulators who circulated a petition sheet that included the signature of an allegedly deceased individual identified in Table 9. Table 10 identifies the circulators that have petition sheets that are part of the sample, but it does not identify the petition sheet numbers. Because this part of the challenge fails to identify each signature being challenged by specifying the sheet number and the line number, staff did not separately consider this table in processing the challenge and cannot provide a specific number breakdown of staff's conclusions.¹⁶ However, assuming the signatures were included in the challenge table attached to the challenge as Exhibit B, staff reviewed every challenged signature and checked it against the signature in QVF. Because the code MC was used in the challenge to code allegations of potential forgery detailed across multiple tables, staff is unable to provide a breakdown of accepted, rejected, and overlapped challenges for each individual table that details allegations of potential fraud.

Relevant to the allegations of potential fraud, out of the 60 signatures that were challenged as MC for fraud, staff identified only 3 signatures as "IS" during its initial review and only 2 signatures were accepted as "IS" during the challenge. The "IS" code is used when the petition signature is omitted or does not sufficiently agree with the signature on file. An "IS" code is not uncommon, as a petition signature may fail to sufficiently agree with a signature in QVF for many reasons such as age of the signer, conditions when signing, signing on a clipboard, etc. In sum, staff did not accept any MC challenges for reason of suspected fraud, rejected 46, and identified 8 that overlapped staff's determination. Six additional challenges were accepted as DUP errors (4) and IS errors (2) also identified in the challenge.

Table 11: Potentially forged circulator signatures. This table identifies 8 petition sheets with "potentially forged circulator signatures," (coded MC). PMFS alleges that there "appears to be indicia of potential fraud—either multiple persons potentially providing the information of a single circulator or evidence of a potentially forged circulator signature." All of the identified pages involve the same circulator—Benjamin Schall. Schall is a registered Michigan voter. Schall has a primary and secondary signature documented in QVF and while the two signatures do have elements that sufficiently agree with each other the signatures also have elements that are significantly different. Accordingly, it appears Schall has two different signature styles. Schall's two signature styles used when signing the circulator certificate both sufficiently agree with either the primary signature or the secondary signature documented in QVF. Because both signatures used on the petitions by Schall match either Schall's primary or secondary signature in QVF, staff recommends rejecting the challenge to the authenticity of

¹⁵ At its [March 20, 2023 meeting](#), the Board of State Canvassers approved proposed updates to staff's random sampling procedures, including expansion to statewide candidate petitions. Accordingly, only signatures included in the random sample generated for MMOP's submission are relevant to the estimated number of valid signatures for the petition, and therefore only these signatures are eligible for challenge.

¹⁶ The [Petition Manual: Statewide Initiative, Referendum, and Constitutional Amendment Petitions](#), page 28, provides that challenges must specify each signature being challenged and the reason why the validity of the signature is being questioned. It explains: "To specify a signature, indicate the sheet number (stamped or written on each sheet) and the line number bearing the signature."

Schall's circulator signatures. The following images are examples of the two signatures styles used on the petitions, taken from petition sheet 27547 and petition sheet 79792:

CIRCULATOR – Do not sign or date certificate until after circulating petition.

(Signature of Circulator) 1 / 29 / 26 (Date)

(Printed Name of Circulator) Benjamin Schall

CIRCULATOR – Do not sign or date certificate until after circulating petition.

(Signature of Circulator) 1 / 28 / 26 (Date)

(Printed Name of Circulator) Benjamin Schall

Table 12: Potentially forged signatures. This table identifies 9 petition signatures “where it appears that the signature departs from the signer’s historic signature.” (Coded MC). Staff compared every challenged signature to the voter’s signature in QVF to determine whether the signatures sufficiently agreed. MCL 168.476(1) states in relevant part: “The qualified voter file shall be used to determine the validity of petition signatures by verifying the registration of signers and the genuineness of signatures on petitions when the qualified voter file contains digitized signatures.” Because the code MC was used in the challenge to code allegations of potential forgery detailed in multiple tables, staff is unable to provide a breakdown of accepted, rejected, and overlapped challenges for Table 12. Relevant to the allegations of potential fraud, out of the 60 signatures that were challenged as MC for fraud, staff identified only 3 signatures as “IS” during its initial review and only 2 signatures were accepted as “IS” during the challenge. The “IS” code is used when the petition signature is omitted or does not sufficiently agree with the signature on file. An “IS” code is not uncommon, as a petition signature may fail to sufficiently agree with a signature in QVF for many reasons such as age of the signer, conditions when signing, signing on a clipboard, etc. In sum, staff did not accept any MC challenges for reason of suspected fraud, rejected 46, and identified 8 that overlapped staff’s determination. Six additional challenges were accepted as DUP errors (4) and IS errors (2) also identified in the challenge.

Table 13: Potentially forged signatures (round-robin/false canvassing). This table identifies 2 petition sheets where PMFS alleges that the circulator “appears to have potentially forged signatures on his own petition sheets,” and 49 petition sheets where the “sheet shows indicia of potential fraud and forgery. Circulator may have engaged in round-robin petition forgery made to appear as if circulator was going door-to-door.” (Coded MC). PMFS argues that handwriting on these sheets involves “Varying numeral styles on the same petition line” and this suggests the registered voter did not write the information in their own hand. However, it is not impermissible for a circulator or other person to fill in required information, such as the date, on the petition sheet. *Johnsen v Bd of State Canvassers*, opinion of the Michigan Court of Claims, issued June 6, 2024 (Case No. 24-000080-MB).

Staff compared every challenged signature to the voter’s signature in QVF to determine whether the signatures sufficiently agreed. See MCL 168.476(1). Because the code MC was used in the challenge to code allegations of potential forgery detailed in multiple tables, staff is unable to provide a breakdown of accepted, rejected, and overlapped challenges for Table 13. Relevant to the allegations of potential fraud, out of the 60 signatures that were challenged as MC for fraud, staff identified only 3 signatures as

“IS” during its initial review and only 2 signatures were accepted as “IS” during the challenge. The “IS” code is used when the petition signature is omitted or does not sufficiently agree with the signature on file. An “IS” code is not uncommon, as a petition signature may fail to sufficiently agree with a signature in QVF for many reasons such as age of the signer, conditions when signing, signing on a clipboard, etc. In sum, staff did not accept any MC challenges for reason of suspected fraud, rejected 46, and identified 8 that overlapped staff’s determination. Six additional challenges were accepted as DUP errors (4) and IS errors (2) also identified in the challenge.

MMOP’s response to signature challenge: MMOP responded to the challenge, asserting that PMFS’ assertions of irregularities “are not well founded.” MMOP characterizes the challenge as including all of the following:

- Wholly innocent and irrelevant errors (such as misspelling the name of Genesee County or writing “Southfeld” instead of “Southfield”)
- Unfounded assertions that voters who signed the petitions were not registered, when in fact those voters can readily be found in the qualified voter file
- Sloppy, but readily understood, handwriting
- Stray marks on petition sheets
- Voters’ inclusion of both their city and their county on the signature line, when the form requires nothing more than the city
- Assertions of fraud based simply on eyeballing signature sheets, combined with the assumption that the circulators—who in many cases were highly trained door-to-door canvassers—could not have gathered signatures from so many households in a neighborhood

MMOP argues that once PMFS’s unfounded challenges were removed, the sample contains at least 772 valid signatures.

MMOP’s response addresses specific challenges from each table in PMFS’s challenge using its own tables. Many of MMOP’s rebuttals to challenge tables 1 (IL), 3 (IS), 5 (IA, IC, NC, and OD), 6 (DATE), and 7 (DMG, FORM, and HEAD) are disagreements with PMFS’s approach to evaluating handwriting, spelling, required information, and stray marks and PMFS’s characterization of the requirements that apply to those elements. MMOP lists the acceptable variations for a signature, as described in the Petition Manual¹⁷ and cites the manual’s statement that “[i]f there are redeeming qualities in the petition signature as compared to the signature on file, the filing official should treat the signature as valid.”

In response to PMFS’s challenge to duplicate signatures in table 2, MMOP argues that PMFS’s Exhibit C, which shows petition sheets displaying the alleged DUPs, includes examples for only 81 of the 148 alleged DUPs. MMOP alleges that PMFS’s failure to provide evidence in support of the challenge rendered the challenge invalid in regard to the signatures without examples.

Regarding PMFS’s challenge tables 4.1 and 4.2 (not registered voters), MMOP identifies 53 signatures “whose names directly match a voter in the qualified voter file who resides in the same city or township as the signer’s written city or township on the petition.” MMOP cites the Petition Manual’s instruction that a signer is considered registered when their registration address differs from their written address

¹⁷[Petition Manual: Statewide Initiative, Referendum, and Constitutional Amendment Petitions](#), pg. 32.

on the petition so long as on the date of signing the signer was registered to vote in the city or township indicated on the petition.

Regarding table 8 (CIRC) and the *Wickman* case, MMOP argues that because the Michigan Supreme Court did not grant leave to appeal, it has not ruled on the merits of the issue, and that the Court of Appeals misread the relevant statute. While MCL 168.482(6), which concerns ballot question petitions, incorporated by reference MCL 168.544c(1), which concerns nominating petitions, those references provide only what the *ballot form* must include, not how a voter must complete the form. MMOP asserts that MCL 168.544c(2) is the “provision that addresses what happens when the circulator fails to provide relevant information[,]” and that section is silent on the question of jurisdictions that are not a city or township. If nothing else, MMOP argues, “the competing inferences render the provision ambiguous, and the tie should go to the voter. A petition sheet should not be invalidated simply because the circulator provided a mailing address that included a jurisdiction that is not a city or township.”

Regarding PMFS’s allegations in tables 9 and 10 regarding petition signatures from allegedly deceased individuals, MMOP argues PMFS failed to include evidence that the petition actually includes signatures from deceased individuals. MMOP includes a table of the allegedly deceased signers detailing living individuals with the same name who are registered Michigan voters.

Regarding PMFS’s allegation in table 11 that a particular circulator’s signature was forged because it appeared differently across petition sheets, MMOP explains that all of the sheets were in fact circulated by the same person and that the person updated their signature in QVF partway through the petition drive. MMOP includes a letter from the circulator as Attachment 2.

Regarding tables 12, 13, and 14 in the challenge—all of which generally allege forgery of voter signatures—MMOP argues the challenge failed to include any actual evidence of forgery. Noting that voter signatures can change over time and under different signing conditions and that signatures were collected by professional door-to-door canvassers, MMOP rebutted the allegation of round-robin circulator fraud. MMOP explains that in response to the allegations of fraud, MMOP “conducted a canvass between Sunday July 12 and Monday July 13 in which [MMOP] attempted to contact the forty-nine (49) petition signers in question” in table 13 of the challenge. MMOP successfully contacted 14 petition signers who reviewed copies of the petition sheets and confirmed their handwriting and signatures. These results are communicated in affidavits from various staff involved in the MMOP petition drive who contacted the signers. The affidavits detail conversations with petition signers and are attached to MMOP’s response as attachment 3. MMOP also attaches “crew sheets” showing individuals and the hours they worked in specific locations during the original canvass for signatures, attached to the response as attachment 4.

In sum, MMOP attempts to rehabilitate 391 signatures.

Staff’s evaluation of response: MMOP refers to the Board’s approved policies as stated in the Petition Manual in support of many of its arguments in response to the challenge. Staff’s evaluation of the petitions and the challenge adhered to all policies and procedures set out in the Petition Manual.

Regarding MMOP’s response to table 2 (DUP) in the challenge, a valid DUP challenge requires only a sheet and line number of the challenged signature and a sheet and line number of the alleged duplicate signature(s). Because Table 2 in PMFS’s challenge included the sheet and line numbers of the alleged

DUPs in the sample and the universe, staff was able to review the sheets and determine whether a signature was a DUP.

Regarding MMOP's response to table 8 (CIRC) in the challenge and the *Wickman* case, even if staff agreed with MMOP that the Michigan Court of Appeals misinterpreted the Michigan Election Law, staff is bound to follow the court's interpretation. Staff cannot interpret the law in a way that is contrary to a published opinion.

Finally, regarding MMOP's response to the allegations of fraud in the challenge, staff did not find evidence of widespread fraud during its initial review of the sample or during staff's processing of the challenge.

Ultimately, after considering the challenge, staff determined an additional 142 signatures were invalid, reducing the number of valid signatures from 799 to 657. Because MMOP had a sufficient number of valid signatures even after processing the challenge, it was not necessary for staff to process MMOP's response.

Final result of signature sample:

<u>Number of valid signatures</u>	<u>Formula result</u>	<u>Sample result</u>
636 or more 635 or fewer	Certify Deny certification	657

Estimated number of valid signatures for petition: Based on the results of this random sample, it is estimated that the petition contains 368,762 valid signatures (at a confidence level of 90% and margin of error of $\pm 2.5\%$),¹⁸ which is 11,804 signatures more than the minimum threshold for certification.

Staff recommendation: Determine petition sufficient.

Note that while the information provided in this staff report is current as of this writing, additional information may be submitted by the petition sponsor or challenger after the date of publication.

This staff report is being published on July 17, 2026, at least two business days prior to the July 24, 2026, meeting at which the Board of State Canvassers will consider the sufficiency of the Michiganders for Money Out of Politics petition in accordance with MCL 168.476(3) ("At least 2 business days before the Board of State Canvassers meets to make a final determination on challenges to and sufficiency of a petition, the Bureau of Elections shall make public its staff report concerning disposition of challenges filed against the petition.").

¹⁸ In order to be determined sufficient, the sample needs a validity level of 63.6%. The validity level of the sample was 65.7%, which is within the $\pm 2.5\%$ margin of error for the sample size.

Attachment 1



STATE OF MICHIGAN
BUREAU OF ELECTIONS
LANSING

MEMORANDUM

DATE: March 14, 2023
TO: Board of State Canvassers
FROM: Jonathan Brater, Director of Elections
SUBJECT: Petition Validation and Sampling Process

I. Overview

Under the Michigan Election Law, the Board of State Canvassers (Board) is responsible for canvassing signatures for statewide ballot questions. The Bureau of Elections (Bureau) assists the Board in the responsibility by reviewing petition signatures and producing a staff report for the Board's review. In calendar year 2022, the Bureau received seven filed statewide ballot question petitions, which included a total of well over 2 million signatures. On behalf of the Board, Bureau staff canvasses these petitions using the random sampling procedure adopted by the Board.

Throughout the 2022 election cycle, the Bureau received numerous questions from the public and members of the Board regarding the petition canvassing process – including the random sampling process, procedures, and methodology. In response to these questions, and in light of the fact that the methodology has not been reviewed in many years, the Bureau engaged the Rehmann Group to consult on and make recommendations for improvements, if applicable, to the Board for improvements to the process and methodology. Rehmann's findings are enclosed with this memorandum.

This memorandum explains the current sampling process and provides an overview of the recommended changes to the process, including the possibility of expanding the use of sampling to statewide candidate petitions.

II. Existing Petition Process

On February 7, 1980, the Board adopted a sampling procedure for canvassing petitions seeking an initiative, referendum, or state constitutional amendment. That procedure was adopted before the development of the state Qualified Voter File (QVF). It includes multiple stages of sorting and reviewing petition sheets and signatures, including an initial "face review" of petition sheet. The Face Review is followed by a random sample of a representative portion of the total "universe" of signatures. Signatures within the sample are examined to confirm that the signatory is a person registered to vote in Michigan and that the signature on the petition sheet matches the signature contained in the QVF. Based on a statistical formula approved by the Board, the number of signatures out of the sample confirmed to be valid determines whether staff recommends the petition be approved or rejected for certification by the Board. In rare instances, the number of valid signatures fall into a span between the

statistically determined acceptance and rejection thresholds. When this occurs, it triggers a second, larger signature sample to increase the precision of the sample and the accuracy of the results. In 1990, the process underwent a review which validated the statistical methods used for the previous ten years. No known review of the process has been presented to the Board since that time. There is currently no sampling procedure used for candidate nominating petitions.

Face Review

Face review involves checking that the mandatory elements of each petition sheet are present and correct, which is also done for candidate nominating petitions.¹ Sheets that do not pass face review are removed from the “universe” of sheets and signatures considered in the filing because every signature on the sheet is invalid.²

This step of the process alone is extremely time-consuming and burdensome for staff; it accounts for nearly 66 percent of the 60-day process. For example, in two statewide petition filings in 2022, staff spent approximately 2,500 personnel hours over 14 business days to conduct face review of two statewide petitions.

Counting Signatures and Numbering Sheets

After face review, staff count the total number of potentially valid signatures on all remaining sheets and stamp an identifying number on each sheet. To count the total number of signatures, staff sorts each petition sheet into batches based on the number of signatures on each sheet and counts the number of sheets in each batch. Then staff totals the number of sheets in each batch, multiplied by the number of signatures per sheet, to determine the total signature count. After this sorting process is complete, staff “shuffles” the sheets in each batch to “un-sort” them in an effort to ensure randomization of the filing before stamping. This step accounts for nearly 25 percent of the 60-day-process and took staff approximately 463 personnel hours over 5 business days.

Random Sampling Process

After face review, counting of signatures and sheets, and numbering of sheets, staff begin the two-step random sampling process. A sample of approximately 500 signatures is randomly selected from the remaining potentially valid signatures. Each of those signatures is examined to confirm that the signatory is a person registered to vote in Michigan, that the signature on the petition sheet matches the signature contained in the (QVF), and that the entry does not contain another fatal defect (for instance, a jurisdiction, date, or address error). Each of the signatures in the sample is determined to be either a valid signature (the genuine signature of a person registered to vote in Michigan that matches the information in QVF) or an invalid signature (because the person who signed the petition sheet is not registered to vote in Michigan, the signature did not match the person’s signature stored in the QVF, or for another fatal defect). Finally, staff tallies the number of signatures in the sample which are valid.

¹ Mandatory elements include ensuring that the paid or volunteer checkbox is completed, that the circulator certificate is properly completed, and the petition is on the proper form and does not cover up warning statements. For more information, see memorandum on Petition Process Review and Coding Updates.

² Staff also remove sheets if every signature affixed to the sheet is obviously invalid for reasons specific to each signature, not the sheet as a whole (for example, if every signature line omitted the date, city, or some other mandatory element).

When selecting and checking the validity of the approximately 500-signature sample during the first step of the sampling process, staff use a computer software program to provide a randomly generated list of sheets and lines.³ A statistical methodology approved by the Board of State Canvassers is used to calculate two thresholds based on the number of valid signatures in the sample: a “rejection” threshold and an “acceptance” threshold. The rejection and acceptance threshold are not the same. The rejection threshold is usually fifteen to thirty signatures lower than the acceptance threshold.

To complete the first step of the canvassing process, staff compare the number of valid signatures in the sample to the rejection and acceptance thresholds. If the number of valid signatures in the sample is equal to or greater than the acceptance threshold, staff recommend that the Board certify the subject of the petition to the ballot. If the number of valid signatures in the sample is lower than or equal to the rejection threshold, staff recommend that the Board decline to certify the subject of the petition to the ballot. If the number of valid signatures in the sample is greater than the rejection threshold, but lower than the acceptance threshold, staff move to the second step of the canvassing process.

The second and final step of the petition canvassing process is employed only when the number of valid signatures fall into the span between the acceptance and rejection thresholds—the “pull more” range. This step is similar to the first step, except that staff uses the same approved methodology to randomly sample approximately 2,000 signatures, and staff calculate a single combined acceptance and rejection threshold (without a “pull more” range). The larger sample of newly drawn signatures is combined with approximately 500 signatures in the original sample to yield a combined sample of approximately 2,500 signatures.

Staff determines how many signatures in the combined sample are valid and compare the number of valid signatures to the acceptance/rejection threshold. If the number of valid signatures in this larger random sample is greater than or equal to the computed acceptance/rejection threshold, staff recommends that the Board certify the subject of the petition to the ballot. If the number of valid signatures in the sample is lower than the acceptance/rejection threshold, staff recommends that the Board decline to certify the subject of the petition to the ballot. This second step, which is usually not required, is used by the Board in its established procedures to obtain a more precise estimate of valid signatures, based on a larger sample size, in cases of close calls—where an initiative fails to reach the acceptance threshold by a small margin. Although even a small margin in the sample would likely yield the correct result when extrapolated to the “universe” of submitted signatures, the second step is an additional safeguard used to increase the precision of the sample and the accuracy of the result.

³ The sample is always at least 500 signatures but may not be exactly 500 signatures because staff requests the computer program initially pull more than 500 sheets and lines. This is necessary based on staff’s expectation based on experience that some identified lines will be blank and that additional sheet and lines will be needed to complete the sample. For example, the computer program may identify 800 sheets and lines because staff anticipate that approximately 300 will be blank, but in fact only 250 turn out to be blank, leaving a sample of 550 signatures.

III. Review by the Rehmann Group

In order to maintain or improve the statistical quality of the process, find efficiencies in the petition process, and allow the Board an opportunity to review and approve any recommended changes to the petition validation and canvass process, the Bureau contracted with Rehmann Group, a financial services and business advisory firm, to review and statistically analyze the state's process for improvements and efficiencies, while improving or maintaining statistical accuracy. Overall, Rehmann concluded that the sampling paper reviewed in 1990 is still fundamentally sound, and that an addendum of the existing process for 2023 would suffice to improve the process.

In addition to reviewing the sampling methodology, Rehmann examined the face review process, the process of pulling the sample, and the one-stage sample versus the two-stage sample. The results of Rehmann's review has been published in the attached report.

Face Review

Rehmann concluded that the face review process is time-consuming and does not statistically affect the results of sampling. Rehmann conducted simulations on a hypothetical petition utilizing data from several 2022 petitions filed with the Bureau. Rehmann simulated the results by drawing samples from a face-reviewed petition and a non-face-reviewed petition filing. The results of the simulations concluded that the confidence factor and margin of error were identical in each case, and the differences in results between the face-reviewed and non-face reviewed petitions varied by statistically insignificant amounts.

Based on this conclusion, Rehmann concluded that eliminating the face review process will not negatively impact the accuracy of sampling but would result in significant administrative time-saving measures for staff.

Sample Selection Process

Currently, when determining the sample, the program prints "call sheets" which provide a specific line on a specific sheet:

SHEET	94	SIG.	4	SHEET	99	SIG.	7
SHEET	204	SIG.	1	SHEET	256	SIG.	1
SHEET	395	SIG.	1	SHEET	406	SIG.	8

As a result of the randomization into batches (described above), this may result in a significant number of "misses" or sheets where there is no signature on that line.

Rehmann reviewed this process and determined that there is no statistical advantage to shuffling the sheets and pulling the sample in this manner. Rather, Rehmann recommended selecting the "4th Signature" rather than the signature on line four (and no longer shuffling the petitions). Rehmann concluded that these changes would result in a faster sample selection process.

One-stage Sample vs. Two-stage Sample

The original sample report outlined two sampling procedures that are employed by staff when sampling. Plan A (one-stage sampling) resulted in larger sample sizes but required only a single draw. Plan B (two-stage sampling) allowed for a smaller initial draw of approximately 500 signatures, with the *potential* need for a second (and possibly much larger) draw depending on the results of the initial sample.

Typically, the Bureau starts with an initial 500 signature sample, but in recent years has had to pull larger samples or review additional signatures either because the statistical methodology as applied to the results of the sample required staff to pull more, or because the Board requested staff review additional signatures. For a 90 percent confidence factor, the margin of error was approximately ± 4.3 percent, although in Rehmann's simulations, the margin of error was actually closer to ± 3.2 percent.

Rehmann found that eliminating the two-stage review process in favor of gathering a larger, initial sample would create an efficiency without negatively impacting the current 90 percent confidence factor. Larger sample sizes hit a confidence factor of 90% with a lower margin of error.

Sample Size	Margin of Error for 90% Confidence
500	3.2%
750	2.6%
1000	2.3%
1500	1.8%
2000	1.6%
2500	1.4%

In the past, in instances where a second, larger sample had to be pulled, an extreme burden was placed onto staff, sponsors, and challengers because it left very little time in the calendar. Rehmann concluded that there were significant administrative time savings by drawing a larger sample immediately, and that coupled with the time savings of eliminating the face review and shuffling processes, the additional time to review the increased signatures would be offset.

Expansion of the Sampling Process to Statewide Candidate Petitions

As part of the review, staff asked Rehmann to examine whether the sampling process currently used for statewide initiative petitions could be expanded for use in statewide candidate petitions. The expansion would cover partisan candidates filing petitions for the offices of Governor/Lieutenant Governor and United States Senator as well as candidates without party affiliation filing petitions for the offices of Governor/Lieutenant Governor, Secretary of State, Attorney General, United States Senator, Member of the State Board of Education, Regent of the University of Michigan, Trustee of Michigan State University, Governor of Wayne State University, and Justice of the Michigan Supreme Court.

Under the Michigan Election Law, partisan candidates may submit up to 30,000 signatures and candidates without party affiliation may submit up to 60,000 signatures. MCL 168.544f.⁴ Staff conducts

⁴ Partisan candidates must submit a minimum of 15,000 valid signatures under the Michigan Election Law; pursuant to *Graveline v. Benson*, 992 F.3d 524 (6th Cir 2021), candidates without party affiliation must submit a minimum of 12,000 valid signatures.

an initial face review of the entire filing to determine ballot eligibility, and processes any challenges submitted pursuant to MCL 168.552.

In the past after the initial face review, Bureau staff did not need to expend a great amount of time reviewing individual signatures on candidate nominating petitions, aside from signatures that were challenged or a relatively low number of signatures of dubious authenticity scattered throughout petitions. However, this changed in 2022 when the Bureau received approximately 70,000 fraudulent signatures submitted by a number of petition circulators across 10 different petitions. Staff spent hundreds of hours attempting to validate signatures. In reality, given the volume of filings, it was not possible to look up each and every signature submitted by the fraudulent petition circulators to individually verify that each and every signature was fraudulent, although all of the signatures reviewed were fraudulent.

In its review, Rehmann concluded that the sampling process, with the changes recommended in this memo, could be further utilized with candidate petitions exception with the drawing of a smaller sample. To achieve the same ± 2.3 percent margin of error at a 90 percent confidence factor utilized in statewide initiative petition filings, Rehmann concluded that a sample of 750 signatures could be drawn on a filing of 30,000. Notably, although the expected confidence factor and margin of error would be similar to petition filings, in the case of candidate petitions a much larger percentage of signatures in the overall petition filing would be sampled—750 would be approximately 2.5 percent of the signatures in a filing of 30,000, as opposed to 1,000 being approximately 0.2 percent in a filing of 500,000.

By utilizing the sampling process in statewide candidate petition filings, staff can better assess signature accuracy and detect fraud with a more efficient process. To whatever extent invalid signatures were submitted as part of candidate nominating petitions—whether through circulator fraud or invalid signatures that the circulators did not know were invalid— these signatures would be reflected in the representative sample and inform the Bureau’s recommendation to the Board on whether or not to certify. This would, in turn, provide greater confidence as the valid number of signatures contained within the filing.

IV. Recommended Changes to the Sampling Process

After reviewing the report, staff recommends the Board do the following:

1. Approve the changes to the sampling method as described within this memorandum and recommended by Rehmann in the attached report. This includes:
 - a. Eliminating face review prior to sampling;
 - b. Eliminate shuffling of the petition sheets;
 - c. When pulling a sampled signature, gathering the signature corresponding to numerical position rather than line number;
 - d. Eliminating the two-stage sample process in favor of a one-stage, larger sample;
 - e. Replace the current software program used to identify and pull signatures with a Visual Basic for Applications.
2. Adopt the same sampling procedure utilized for statewide initiative petitions for use in statewide candidate petitions with a minimum required valid signature threshold of 15,000 (with a sample size of 750).

3. Adopt the signature validity codes recommended in the memorandum on Petition Process Review and Coding Updates and corresponding manual.