

LOBBY LAW COMPLAINT

From Bob LaBrant <bob@boblabrant.com>
Date Mon 12/1/2025 11:07 AM
To Bob LaBrant <bob@boblabrant.com>

LOBBY LAW COMPLAINT

Section 1. COMPLAINTANT

Name: Robert LaBrant

Daytime telephone number: (517) 881-5146

Address: 12411 Pine Ridge Drive, Perry, Michigan 48872

Email: bob@boblabrant.com

Section 2. ALLEGED VIOLATORS

(RESPONDENTS)

Name: William B. Wortz and Public Affairs Associates

Address: 123 W. Allegan, Suite 800

Lansing, Michigan 48933

Daytime telephone number: (517) 371-3800

Email: wortz@paaonline.com

SECTION 3: ALLEGATIONS

I allege a violation of the Michigan Lobby Law

Identify the section of the law alleged to be violated:

Section 14 (MCL 4.414)

and R4.505-506

Explain how the law was violated:

This complaint is based on the article "Michigan House Speaker gets Lions tickets from lobbyist while blocking open records bill" published in the Detroit News on November 25, 2025, under Craig Mauger's byline.

<https://www.detroitnews.com/story/news/politics/2025/11/25/michigan-house-speaker-gets-lions-tickets-from-lobbyist-while-blocking-open-records-bill/87455283007/>

Soon after the personal financial disclosure reports by public officials, mandated by the passage of Proposal 1 in 2022, were first filed; reporters noticed that a number of lawmakers were disclosing gifts of football tickets from multi-client lobbying firms. Inquiring how that was possible with the then \$76 gift limit, one lobbyist agent told the reporter that their practice was to would send a letter requesting the lawmaker to reimburse the firm for the difference between the face value of the ticket(s) and the \$76 gift limit.

I disagreed as to the legality of that practice, and sought a declaratory ruling. Because as a retiree and no longer registered as a lobbyist agent, I did not meet the definition of an "interested person" I received an interpretive statement instead. An interpretive statement is not binding on the Department of State, so I requested that the Department codify the LaBrant interpretive statement by beginning the administrative rule promulgation process. The Department did so, officially promulgating it as an administrative rule, which now has the force and effect of law.

Speaker Hall and Public Affairs Associates both declined a request by the Detroit News reporter to review a copy of the reimbursement check and the amount of the check to verify compliance with the Michigan Lobby Law and the new Administrative Rule (R4.505-506).

With no other remedy available, this complaint is filed to allow William Wortz, the lobbyist agent who distributed the tickets to Hall to resolve this media controversy by simply producing a photocopy of the check Public Affairs Associates (PAA) received for reimbursement from Speaker Hall for the cost of the ticket(s) for the Detroit Lions game against the Minnesota Vikings at Ford Field played on November 2, 2025. This would allow for administrative, investigative, and prosecutorial economy of resources.

SECTION 4. RELIEF SOUGHT:

If found to not to be compliance, Public Affairs Associates could be charged with a misdemeanor for violating the current reimbursement rules on tickets valued over \$79 a month.

Although not statutory required, the Secretary of State is not prohibited from simply requesting that PAA voluntarily provide the Bureau of Elections (BOE) with a photocopy of the reimbursement check by Hall to PAA in order to forestall the complaint's referral to the Attorney General under MCL 4. 424 (2). BOE's examination of a photocopy of the check would answer the following questions:

1. Was the check drawn on Matt Hall's personal checking account?
2. Was the reimbursement check made payable to PAA or William Wortz . Both are lobbyist agents and are prohibited by the Michigan Lobby Law from providing a gift valued at more than \$79 during a month and the date the reimbursement check was received. Was the reimbursement check received before the date of the football game?
3. Was the amount of the gift reimbursement check sufficient to cover the fair market value of the tickets provided?
4. If yes to questions 1, 2, and 3, Representative Hall complied with the recent administrative rule promulgated by the Department of State on ticket reimbursement. As a result, when notified by BOE, as the undersigned complainant, I will immediately withdraw my complaint.
5. If no to questions 1, 2, and 3, was the reimbursement check to PAA drawn from a checking account of a 501 C 4 organization that is closely linked to Speaker Hall (Such as Building a Better Economy). Past Speakers have used a 501 C 4 social welfare organization linked to them to pay for personal expenses. This would not be a violation of the Michigan Lobby Law if the 501 C 4 organization is not registered as a lobbyist or lobbyist agent. If this is the case, when notified by BOE, as the undersigned complainant , I will immediately withdraw my complaint.
6. If PAA refuses to voluntarily comply with these requests, the Department of State should proceed to refer this complaint as required to the Attorney General as provided for in MCL 4.424 (2). It is the Attorney General, not the Secretary of State who determines whether there is probable cause to seek enforcement of any civil or criminal penalty provided for in the Michigan Lobby Law. Upon a showing of probable cause, the Attorney General can seek an investigative subpoena to obtain emails, bank records,and other documents from PAA.

SECTION 5. CERTIFICATION:

I certify that to best of my knowledge, information, and belief formed after a reasonable inquiry under the circumstances, each factual contention of this complaint is supported by evidence.

Robert LaBrant

Robert LaBrant

Signature of the
Complainant

December 1, 2025

Date

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