



FACT

FOUNDATION FOR
ACCOUNTABILITY
AND CIVIC TRUST

July 6, 2022

Michigan Department of State
Bureau of Elections
Richard H. Austin Building, 1st Floor
430 W. Allegan
Lansing, Michigan 48918

Email: elections@michigan.gov

Re: Campaign Finance Complaint against **Road to Michigan's Future**

To the Michigan Department of State:

The Foundation for Accountability and Civic Trust (FACT) is a nonprofit organization dedicated to promoting accountability, ethics, and transparency in government and civic arenas. We achieve this mission by hanging a lantern over public officials who put their own interest over the interests of the public good. We submit this complaint, pursuant to the Michigan Campaign Finance Act section 169.215, to request the Department of State immediately investigate and take appropriate enforcement action against Road to Michigan's Future, P.O. Box 12248, Lansing, MI 48901.

Road to Michigan's Future is a 501(c)(4) organization that is not registered as a ballot question committee. However, under the precedent the Department set forth in a 2021 complaint decision, Road to Michigan's Future's activity in 2020 demonstrates it should have registered as a committee and filed the required reports.¹

¹ *LaBrant v. Michigan Citizens for Fiscal Responsibility, Michigan! My Michigan!*, MI Campaign Finance Complaint filed May, 25, 2021 (decision filed Oct. 27, 2021) (attached as Exhibit A).

From July 2020 to October 2021, Road to Michigan’s Future raised and contributed \$865,000 to a ballot question committee, Keep Michigan Safe.² Both Road to Michigan’s Future and Keep Michigan Safe were newly formed organizations in 2020 and formed within months of one another. The subsequent interaction between the two entities unfolded as follows: approximately six and one-half months after it formed on January 15, 2020, and prior to which it had no assets, Road to Michigan’s Future made a \$750,000 contribution to Keep Michigan Safe.³ Keep Michigan Safe was formed on July 3, 2020, and received the contribution on July 31, 2020.⁴ This was Keep Michigan Safe’s primary funding throughout the next year and three months, until its cash on hand was low. Then Road to Michigan’s Future replenished Keep Michigan Safe’s funds by making another \$115,000 contribution in October 2021, which Keep Michigan Safe paid out to its vendors almost in its entirety over the next six weeks.⁵ Ultimately, **Road to Michigan’s Future’s contributions comprised 86.4% of Keep Michigan Safe’s funding.**

Additionally, the organizations have other ties to one another. In its 2020 tax filings, Road to Michigan’s Future listed its phone number as the phone number of Heather Ricketts, who was also the treasurer of Michigan Governor Gretchen Whitmer’s campaign in 2020.⁶ The campaign

² Keep Michigan Safe, Michigan Campaign Finance Contribution Search, Department Of State, accessed July 1, 2022, available at: https://miboecfr.nictusa.com/cgi-bin/cfr/contrib_anls_res.cgi.

³ Road To Michigan’s Future, Articles Of Incorporation, Department Of Licensing And Regulatory Affairs, accessed Jan. 15, 2020, available at: <https://cofs.lara.state.mi.us/CorpWeb/CorpSearch/CorpSearchViewPDF.aspx>; Craig Mauger, *Pro-Whitmer Nonprofit Beats Pro-Snyder Groups By Raising \$6.5M In One Year*, The Detroit News, Jan. 17, 2020, available at: <https://www.detroitnews.com/story/news/politics/2022/01/17/pro-gretchen-whitmer-nonprofit-beats-pro-snyder-groups-raising-6-million-2020-tax-filing/6554927001/>; Keep Michigan Safe, Michigan Campaign Finance Contribution Search, Department Of State, accessed July 1, 2022, available at: https://miboecfr.nictusa.com/cgi-bin/cfr/contrib_anls_res.cgi.

⁴ Keep Michigan Safe, Committee Statement Of Organization, Department Of State, filed July 3, 2020, available at: <https://cfrsearch.nictusa.com/committees/519829>; Keep Michigan Safe, Michigan Campaign Finance Contribution Search, Department Of State, accessed July 1, 2022, available at: https://miboecfr.nictusa.com/cgi-bin/cfr/contrib_anls_res.cgi.

⁵ Keep Michigan Safe, Michigan Campaign Finance Contribution Search, Department Of State, accessed July 1, 2022, available at: https://miboecfr.nictusa.com/cgi-bin/cfr/contrib_anls_res.cgi; Keep Michigan Safe, Michigan Campaign Finance Expenditure Search, Department Of State, accessed July 1, 2022, available at: https://miboecfr.nictusa.com/cgi-bin/cfr/contrib_anls_res.cgi.

⁶ Craig Mauger, *Pro-Whitmer Nonprofit Beats Pro-Snyder Groups By Raising \$6.5M In One Year*, The Detroit News, Jan. 17, 2020, available at: <https://www.detroitnews.com/story/news/politics/2022/01/17/pro-gretchen-whitmer-nonprofit-beats-pro-snyder-groups-raising-6-million-2020-tax-filing/6554927001/> (“The phone number listed on Road to Michigan’s Future’s tax filing for 2020 went to a voicemail box for Whitmer’s current campaign treasurer, Heather Ricketts. She works as an independent contractor for Road to Michigan’s Future, said Maeve Coyle, spokeswoman for Whitmer’s campaign.”).

stated Ricketts was an “independent contractor” for Road to Michigan’s Future and “the Governor has helped with fundraising” for Road to Michigan’s Future.⁷ Keep Michigan Safe also paid Ricketts for “consulting” or as a “compliance contractor.”⁸

The following facts all strongly demonstrate a level of coordination showing the entities were not independent of each other: (1) both organizations were newly formed in 2020 and formed within months of one another; (2) the large disparity between Road to Michigan’s Future’s assets (\$0) at the end of 2019 and the amount it contributed (\$750,000) to Keep Michigan Safe in July 2020; (3) Road to Michigan’s Future was Keep Michigan Safe’s first contributor immediately after Keep Michigan Safe was formed in July 2020; (4) Road to Michigan’s Future was Keep Michigan Safe’s primary source of funding; (5) Road to Michigan’s Future replenished Keep Michigan Safe’s cash on hand with another large contribution when Keep Michigan Safe needed to pay its vendors; and (6) the organizations’ common contractor.

It is not a violation for an organization to make contributions to a ballot question committee.⁹ However it is “a violation of the Act for an organization to raise money on behalf of the ballot question committee in order to shield the organization’s donors from the reporting requirements of the Act.”¹⁰ The facts of this case demonstrate that this is precisely what occurred here, and they exceed the facts in a 2021 Department decision that found organizations “were soliciting or receiving funds for the purpose of collecting contributions with the intent of financially supporting the ballot question committee.” Thus, we request the Department investigate and find there is reason to believe that a violation of the MCFA occurred.¹¹

I. Law.

Under Michigan law, a “committee” is defined as an organization:

“that receives contributions or makes expenditures for the purpose of influencing or attempting to influence the action of the voters for or against the nomination or election of a candidate, the qualification, passage, or defeat of a ballot question, or the qualification of a new political party, if contributions received total \$500.00 or

⁷ *Id.*

⁸ Keep Michigan Safe, Michigan Campaign Finance Expenditure Search, Department Of State, accessed July 1, 2022, available at: https://miboecfr.nictusa.com/cgi-bin/cfr/contrib_anls_res.cgi.

⁹ *Id.* (citing MCL 169.203(4)).

¹⁰ *Id.* (citing MCL 169.203(4)).

¹¹ MCL 169.15(10).

more in a calendar year or expenditures made total \$500.00 or more in a calendar year.”¹²

The statute further specifies that an organization does not meet the definition of a committee solely because it makes an expenditure to a ballot question committee or an independent expenditure committee.¹³ However, the organization does meet the definition of a committee if it “solicits or receives contributions for the purpose of making an expenditure to that ballot question committee or independent expenditure committee.”¹⁴

Whether or not an organization meets the definition of a committee is consequential because a committee is required to report and publicly disclose information. An organization must file a statement of organization within ten days of formation and thereafter file statements disclosing the organization’s contributions and expenditures.¹⁵ If an organization fails to file the required statements, civil or criminal penalties are imposed.¹⁶

To determine whether an organization has “solicited or received contributions for the purpose of making an expenditure to a ballot question committee” and thus has become a committee itself, the Department examines facts showing the two organizations are not independent of one another.¹⁷ For instance, prior to October 2021, some specific facts the Department considered when it found a corporation has become a committee are: (1) the corporation and ballot question committee formed within a short period of time; (2) the organizations had the same officers; (3) the percentage of the ballot question committee’s total

¹² MCL 169.203(4).

¹³ *Id.*

¹⁴ *Id.*; *LaBrant v. Michigan Citizens for Fiscal Responsibility, Michigan! My Michigan!*, MI Campaign Finance Complaint filed May, 25, 2021 (decision filed Oct. 27, 2021); *LaBrant v. Unlock Michigan*, MI Campaign Finance Complaint filed Sept. 17, 2020 (decision filed April 9, 2021).

¹⁵ MCL 169.224.

¹⁶ *See, e.g.*, MCL 169.234.

¹⁷ *Id.*; *LaBrant v. Michigan Citizens for Fiscal Responsibility, Michigan! My Michigan!*, MI Campaign Finance Complaint filed May, 25, 2021 (decision filed Oct. 27, 2021) (explaining evidence the corporation raised significant funds, contributed the funds to a ballot question committee within the calendar year the funds were raised, and the ballot question committee immediately paid vendors supported a finding the corporation was a committee and must register with the Department); *LaBrant v. Unlock Michigan*, MI Campaign Finance Complaint filed Sept. 17, 2020 (decision filed April 9, 2021) (explaining evidence the corporation and ballot question committee are controlled by the same individuals and functioning as the same entity support a finding the corporation is a committee and must register with the Department).

funding that was from the corporation; and (4) the flow of money between the corporation and ballot question committee demonstrated a relationship between the two groups.¹⁸

Then in an October 27, 2021 decision, the Michigan Department of State considered the case of *LaBrant v. Michigan Citizens for Fiscal Responsibility, Michigan! My Michigan!*, MI Finance Complaint filed May 25, 2021 (decision filed Oct. 27, 2021) (2021 Complaint). This case involved two 501(c)(4) organizations, Michigan Citizens for Fiscal Responsibility (MCFR) and Michigan! My Michigan! (MMM), which were not registered as committees themselves but had made contributions to a ballot question committee, Unlock Michigan (Unlock).¹⁹

The Department had two pieces of evidence which led to their ruling: (1) the organizations' 2019 form 990 showing their assets at the end of the year and (2) the amount of contributions they gave as disclosed by Unlock in 2020.²⁰ MCFR had \$715,137 in assets at the end of calendar year 2019 and contributed approximately \$1,780,000 to Unlock from June to October 2020.²¹ MMM had \$172,452 in assets at the end of calendar year 2019 and contributed approximately \$550,000 to Unlock from June to October 2022.²²

There was no evidence of the date or amount of contributions received by MCFR and MMM throughout 2020 or the total amount of their assets at any particular point during the year.²³ Both MCFR and MMM filed affidavits stating that they neither "solicited or received contributions for the purpose of making an expenditure to Unlock Michigan or any other ballot question committee."²⁴

After comparing MCFR and MMM's assets at the beginning of 2020 and the contributions each made to the ballot question committee during the year, the Department found

¹⁸ *LaBrant v. Unlock Michigan*, MI Campaign Finance Complaint filed Sept. 17, 2020 (decision filed April 9, 2021); *Turnaround Detroit v. Detroit Forward*, MI Campaign Finance Complaint (decision filed April 9, 2014), available at: https://www.michigan.gov/-/media/Project/Websites/sos/14delrio/Turnaround_Detroit_V_Detroit_Forward_and_MCEF_pt_2.pdf?rev=0e1efb6028ff45389da6de8c305aa677 (considering that the corporation contributed over 33% of the ballot question committee's total funding during the entire Detroit mayoral election cycle).

¹⁹ *LaBrant v. Michigan Citizens for Fiscal Responsibility, Michigan! My Michigan!*, MI Campaign Finance Complaint filed May, 25, 2021 (decision filed Oct. 27, 2021).

²⁰ *Id.*

²¹ *Id.*

²² *Id.*

²³ *Id.*

²⁴ *Id.*

that the assets MCFR and MMM each contributed to the ballot question committee during 2020 “far exceeds the assets controlled by the organizations” at the beginning of the year.²⁵ Additionally, MCFR and MMM made contributions to the ballot question committee “within days of similarly sized payments” from the ballot question committee to its vendor, which demonstrated coordination “to some extent.”²⁶ The Department found there “may be reason to believe” that MCFR and MMM should have registered as committees themselves and filed the required statements.²⁷ The decision stated:

“As previously stated, it is not a violation of the Act for a group to raise funds in its normal course of conduct and make contributions to a ballot question committee or to coordinate with that ballot question committee. It is, however, a violation of the Act for an organization to raise money on behalf of the ballot question committee in order to shield the organization’s donors from the reporting requirements of the Act. The fundraising necessary to allow MCFR to contribute \$1,780,000 to Unlock and MMM to contribute \$550,000 to Unlock from June to October 2020 is substantial. Although it may be possible that each entity raised those funds in the first half of 2020 independently of each entity’s support for Unlock, to assume that the aggressive fundraising activity necessary for each organization to raise the sums that were then transferred to Unlock was completely independent strains credulity. The disparity between each organization’s assets going into 2020, the amount that each organization contributed to Unlock, and the timing of those contributions demonstrate a level of coordination showing the entities were not independent of each other.

In particular, the number of payments that MCFR and/or MMM made to Unlock days before Unlock made similarly sized payments to NPM suggests that MCFR and MMM were soliciting or receiving funds for the purpose of collecting contributions with the intent of financially supporting Unlock. Such fundraising for the purpose of supporting a ballot question committee, as is evidenced in the instant case, makes MCFR and MMM themselves ballot question committees responsible for registration and for filing appropriate campaign statements under the MCFA, but neither organization, to date, has registered as a committee nor filed those campaign statements as required by sections 24 and 33 of the Act.

²⁵ *Id.*

²⁶ *Id.*

²⁷ *Id.*

Given the coordination between Unlock, the proximity of contributions made to Unlock and the expenditures made by Unlock, and the fact that neither MCFR nor MMM would have been able to make such contributions to Unlock without soliciting/receiving additional funds during 2020, there is reason to believe that MCFR and MMM may have solicited/received funds for the purpose of making contributions to Unlock.”²⁸

Therefore, in addition to the factors established by the Department prior to the 2021 Complaint, one factual scenario where the Department found an organization “solicits or receives contributions for the purpose of making an expenditure to that ballot question committee” and is thus a ballot question committee itself is when: (1) the organization solicited funds prior to or simultaneously with making contributions to a ballot question committee, and (2) the amount or timing of either contributions from the organization or payments the ballot question committee makes to its vendors indicate coordination.

II. Analysis

Issue Presented: Whether Road to Michigan’s Future Is A Committee Thereby Mandating Registration Obligations With the Department.

Road to Michigan’s Future is a social welfare organization formed pursuant to Section 501(c)(4) of the Internal Revenue Code (like MCFR and MMM in the 2021 complaint).²⁹ Road to Michigan’s Future was incorporated on January 15, 2020, and thus at the end of 2019 it had no assets.³⁰ Seven months later on July 31, 2020, Road to Michigan’s Future contributed \$750,000 to a ballot question committee, Keep Michigan Safe.³¹ As in the 2021 Complaint, the fundraising necessary to allow Road to Michigan’s Future to raise and contribute \$750,000 to Keep Michigan Safe only seven months after it was created is “substantial.”³² Clearly, in the words of the Department itself in the 2021 Complaint, the assets Road to Michigan’s Future contributed to

²⁸ *Id.*

²⁹ Road To Michigan’s Future, Articles Of Incorporation, Department Of Licensing And Regulatory Affairs, accessed Jan.15, 2020, available at: <https://cofs.lara.state.mi.us/CorpWeb/CorpSearch/CorpSearchViewPDF.aspx>; Craig Mauger, *Pro-Whitmer Nonprofit Beats Pro-Snyder Groups By Raising \$6.5M In One Year*, The Detroit News, Jan. 17, 2020, available at: <https://www.detroitnews.com/story/news/politics/2022/01/17/pro-gretchen-whitmer-nonprofit-beats-pro-snyder-groups-raising-6-million-2020-tax-filing/6554927001/>.

³⁰ *Id.*

³¹ Keep Michigan Safe, Michigan Campaign Finance Contribution Search, Department Of State, accessed July 1, 2022, available at: https://miboecfr.nictusa.com/cgi-bin/cfr/contrib_anls_res.cgi

³² *LaBrant v. Michigan Citizens for Fiscal Responsibility, Michigan! My Michigan!*, MI Campaign Finance Complaint filed May, 25, 2021 (decision filed Oct. 27, 2021).

the ballot question committee during 2020 “far exceeds the assets controlled by the organizations” at the beginning of the year when it was not even formed and was at zero.³³

In fact, this case is more egregious than the 2021 Complaint because Road to Michigan’s Future had to fundraise significantly more than either of the organizations in nearly the same time period. In the 2021 Complaint, the organizations were in existence at the beginning of 2020, began 2020 with more assets (MCFR \$715,137 and MMM \$172,452), but contributed less through July 31 (MCFR \$695,000 and MMM \$0). Road to Michigan’s Future had less than seven months to fundraise \$750,000 beginning from no assets.

Because Road to Michigan’s Future does not publicly disclose its donations and expenditures, the total assets controlled by this entity or the timing of the contributions it received during 2020 are not publicly known. Likewise, in the 2021 Complaint, the Department did not have this information for MCFR and MMM prior to their donations to Unlock. The Department found this information was unnecessary and presumed the funds were raised for the purpose of financing Unlock in the 2021 Complaint. The same standard certainly must apply here. Moreover, given the greater amount Road to Michigan’s Future had to fundraise before making a large contribution in July 2021 (as compared to MCFR \$0 and MMM \$0 because they each had assets at the beginning of the year that were greater than the contributions they made during this time period), it is clear that Road to Michigan’s Future’s fundraising was for the purpose of financing Keep Michigan Safe.

Additionally, Road to Michigan’s Future’s contributions were also “substantial” to Keep Michigan Safe. Keep Michigan Safe formed on July 3, 2020, and within that month Road to Michigan’s Future funded the new ballot question committee and was its first and primary contributor.³⁴ From July 2020 to October 2021 **Road to Michigan’s Future contributed \$865,000 to Keep Michigan Safe—comprising 86.4% of Keep Michigan Safe’s total fundraising during this period.**³⁵

³³ *LaBrant v. Michigan Citizens for Fiscal Responsibility, Michigan! My Michigan!*, MI Campaign Finance Complaint filed May, 25, 2021 (decision filed Oct. 27, 2021).

³⁴ Keep Michigan Safe, Committee Statement Of Organization, Department Of State, filed July 3, 2020, available at: <https://cfrsearch.nictusa.com/committees/519829>; Keep Michigan Safe, Michigan Campaign Finance Contribution Search, Department Of State, accessed July 1, 2022, available at: https://miboecfr.nictusa.com/cgi-bin/cfr/contrib_anls_res.cgi.

³⁵ Keep Michigan Safe, Michigan Campaign Finance Contribution Search, Department Of State, accessed July 1, 2022, available at: https://miboecfr.nictusa.com/cgi-bin/cfr/contrib_anls_res.cgi.

For instance, in 2020, the next largest contributions Keep Michigan Safe received were two contributions of \$1,000 from Richard Whitmer and Rita Rosenberg, and all other contributions were under \$500.

As its primary funder, Road to Michigan's Future replenished Keep Michigan Safe when it needed in 2021, as viewed in the following chart:

Selected transactions reported by Road to Michigan's Future³⁶

Date	Contributing Organization or Vendor	Amount Contributed to Keep Michigan Safe	Amount Paid by Keep Michigan Safe	Running Balance
July 31, 2020	Road to Michigan's Future	\$750,000		\$750,000.00
August 27, 2020	2020 Ballcamp LLC		\$85,000.00	\$668,578.63
September 5, 2020	Goodman Acker		\$18,592.43	\$647,133.77
September 9, 2020	2020 Ballcamp LLC		\$115,000.00	\$530,083.77
September 23, 2020	Clark Hill		\$32,554.50	\$500,100.65
September 29, 2020	Byrum Fisk		\$20,000.00	\$480,355.74
October 2, 2020	2020 Ballcamp LLC		\$67,000.00	\$404,709.74
October 2, 2020	Run the World		\$15,000.00	\$389,564.99
October 8, 2020	Change Media		\$32,455.39	\$358,576.03
October 13, 2020	Practical Political Consulting		\$25,000.00	\$335,044.56
October 27, 2020	Byrum Fisk		\$10,000.00	\$317,425.56
October 27, 2020	Clark Hill		\$17,689.00	\$299,736.56

³⁶ Keep Michigan Safe, Michigan Campaign Finance Contribution Search, Department Of State, accessed July 1, 2022, available at: https://miboecfr.nictusa.com/cgi-bin/cfr/contrib_anls_res.cgi; Keep Michigan Safe, Michigan Campaign Finance Expenditure Search, Department Of State, accessed July 1, 2022, available at: https://miboecfr.nictusa.com/cgi-bin/cfr/contrib_anls_res.cgi.

November 19, 2020	Goodman Acker		\$35,103.34	\$264,480.66
November 27, 2020	Clark Hill		\$11,741.50	\$255,127.16
December 1, 2020	Byrum Fisk		\$10,000.00	\$245,980.16
January 26, 2021	Byrum Fisk		\$10,000.00	\$231,320.86
March 1, 2021	Byrum Fisk		\$10,000.00	\$201,969.08
March 17, 2021	Danielle Villela		\$10,000.00	\$183,447.75
March 26, 2021	Practical Political Consulting		\$18,134.63	\$153,663.62
April 16, 2021	Practical Political Consulting		\$31,976.62	\$93,111.19
May 12, 2021	Goodman Acker		\$38,025.93	\$33,615.17
May 24, 2021	Practical Political Consulting		\$20,227.37	\$14,390.30
October 6, 2021	Road to Michigan's Future	\$115,000		\$125,833.01
October 13, 2021	Byrum Fisk		\$1,250.00	\$124,666.51
October 13, 2021	Goodman Acker		\$31,772.22	\$92,894.29
October 15, 2021	EveryAction		\$25,600.00	\$67,339.29
October 21, 2021	Run the World		\$5,500.00	\$61,984.29
November 18, 2021	Clark Hill		\$40,000.00	\$18,768.84
December 29, 2021	Clark Hill		\$28,552.70	\$19,671.86

Road to Michigan's Future was the primary source of funds Keep Michigan Safe had to pay its vendors in 2020 and into 2021. When Keep Michigan Safe's cash on hand was low in October 2021, Road to Michigan's Future made a \$115,000 contribution, which was closely followed by Keep Michigan Safe's payments to vendors in nearly that same amount over the next six weeks. Thus, it is absolutely clear that, given the coordination and ties between the organizations, Road to Michigan's Future raised funds with the purpose of giving these funds to Keep Michigan Safe.

To make the point even more clear, applying the Department's analysis in the 2021 Complaint decision to the present situation:

“[I]t is not a violation of the Act for a group to raise funds in its normal course of conduct and make contributions to a ballot question committee or to coordinate with that ballot question committee. It is, however, a violation of the Act for an organization to raise money on behalf of the ballot question committee in order to shield the organization's donors from the reporting requirements of the Act. The fundraising necessary to allow [Road to Michigan's Future] to contribute [\$865,000] to [Keep Michigan Safe] . . . from [July 2020 to October 2021] is substantial. Although it may be possible that [this] entity raised those funds [simultaneously] independently of [the] entity's support for [Keep Michigan Safe], to assume that the aggressive fundraising activity necessary for [this] organization to raise the sums that were then transferred to [Keep Michigan Safe] was completely independent strains credulity. The disparity between [this] organization's assets going into 2020, the amount that [this] organization contributed to [Keep Michigan Safe], and the timing of those contributions demonstrate a level of coordination showing the entities were not independent of each other.

In particular, the number of payments that [Road to Michigan's Future] made to [Keep Michigan Safe] days before [Keep Michigan Safe] made similarly sized payments to [its vendors] suggests that [Road to Michigan's Future] [was] soliciting or receiving funds for the purpose of collecting contributions with the intent of financially supporting [Keep Michigan Safe]. Such fundraising for the purpose of supporting a ballot question committee, as is evidenced in the instant case, makes [Road to Michigan's Future] [itself a] ballot question committee[] responsible for registration and for filing appropriate campaign statements under the MCFA, but [this] organization, to date, has [not] registered as a committee nor filed those campaign statements as required by sections 24 and 33 of the Act.

Given the coordination between [Keep Michigan Safe], the proximity of contributions made to [Keep Michigan Safe] and the expenditures made by [Keep Michigan Safe], and the fact that [Road to Michigan's Future] would [not] have been able to make such contributions to [Keep Michigan Safe] without soliciting/receiving additional funds during 2020, there is reason to believe that [Road to Michigan's Future] may have solicited/received funds for the purpose of making contributions to [Keep Michigan Safe].³⁷

While the analysis of the 2021 Complaint alone meets the standard, there is additional evidence demonstrating the coordination and ties between the organizations. Both organizations were formed in 2020 within months of one another and soon Road to Michigan's Future became the primary funder of Keep Michigan Safe. These new organizations also had a common "contractor," Heather Ricketts.³⁸ Ricketts was clearly a representative of Road to Michigan's Future because her phone number was used as the organization's phone number on its tax filings, and she was a contractor for both Road to Michigan's Future and Keep Michigan Safe.³⁹ Yet, when applying the standards set forth in the 2021 Complaint alone, the evidence in this case far exceeds the "reason to believe" standard that Road to Michigan's Future "may have taken actions that qualify [it] as a ballot question committee" and thus has violated Michigan Campaign Finance Act sections 24 and 34.⁴⁰

III. Conclusion & Request for Action.

The facts support a finding that Road to Michigan's Future solicited contributions for the sole purpose of making expenditures to a ballot question committee. We respectfully request the Department of State immediately investigate the apparent violations set forth in this Complaint and find reason to believe that Road to Michigan's Future has violated the Michigan Campaign

³⁷ *Id*; *LaBrant v. Michigan Citizens for Fiscal Responsibility, Michigan! My Michigan!*, MI Campaign Finance Complaint filed May, 25, 2021 (decision filed Oct. 27, 2021).

³⁸ Ricketts was the campaign treasurer for Governor Whitmer's campaign, Whitmer was also fundraising for Road to Michigan's Future, and it was Whitmer's campaign that stated Ricketts was an "independent contractor" for Road to Michigan's Future. Craig Mauger, *Pro-Whitmer Nonprofit Beats Pro-Snyder Groups By Raising \$6.5M In One Year*, The Detroit News, Jan. 17, 2020, available at: <https://www.detroitnews.com/story/news/politics/2022/01/17/pro-gretchen-whitmer-nonprofit-beats-pro-snyder-groups-raising-6-million-2020-tax-filing/6554927001/>.

³⁹ Craig Mauger, *Pro-Whitmer Nonprofit Beats Pro-Snyder Groups By Raising \$6.5M In One Year*, The Detroit News, Jan. 17, 2020, available at: <https://www.detroitnews.com/story/news/politics/2022/01/17/pro-gretchen-whitmer-nonprofit-beats-pro-snyder-groups-raising-6-million-2020-tax-filing/6554927001/>.

⁴⁰ *LaBrant v. Michigan Citizens for Fiscal Responsibility, Michigan! My Michigan!*, MI Campaign Finance Complaint filed May, 25, 2021 (decision filed Oct. 27, 2021).

Finance Act. It is clear, given the facts in this case and the precedent set forth by the 2021 Complaint, that Road to Michigan's Future must file as a committee, including filing all outstanding statements and reports, paying any late filing fees, and any applicable civil or criminal penalties.

I certify that to the 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.

Respectfully submitted,

The Foundation for Accountability and Civic Trust



By: Kendra Arnold
Executive Director
Foundation For Accountability and Civic Truест
1717 K Street NW, Suite 900, Washington, D.C., 20006

Exhibit A



STATE OF MICHIGAN
JOCELYN BENSON, SECRETARY OF STATE
DEPARTMENT OF STATE
LANSING

October 27, 2021

Brian D. Shekell
Clark Hill
500 Woodward Ave., Suite 3500
Detroit, MI 48226

Dear Mr. Shekell:

The Department of State (Department) has finished its initial investigation of the campaign finance complaint filed against your clients Michigan Citizens for Fiscal Responsibility (MCFR) and Michigan! My Michigan! (MMM), as well as against Unlock Michigan (Unlock), by Robert LaBrant alleging violations of the Michigan Campaign Finance Act (MCFA or Act). This letter concerns the current disposition of the complaint against your clients.

The complaint alleged that MCFR and MMM solicited or received donations for the purpose of making expenditures to Unlock. Unlock is a ballot question committee regulated by the MCFA. In support of these claims, Mr. LaBrant stated that MCFR and MMM together contributed over \$2.3 million in funding to Unlock from June to October 2020, “nearly 86%” of Unlock’s total funding during that period. The complaint also showed that MCFR and/or MMM frequently provided large amounts of funding to Unlock within days of Unlock making a large payment to the outside signature-gathering firm National Petition Management (NPM).

MCFR and MMM also jointly responded to the complaint.¹ In their response, MCFR and MMM claimed that neither organization “solicited or received contributions for the purpose of making an expenditure to Unlock Michigan or any other ballot question committee.” MCFR and MMM included a September 9, 2020 affidavit from Heather Lombardini stating that “MCFR ha[d] not

¹ MCFR and MMM also alleged that the instant complaint should be dismissed as a successive complaint. However, as indicated in the Department’s April 9, 2021 dismissal to Mr. LaBrant, the prior complaint asked the Department only to investigate whether 5 contributions were violative of the Act. Because the instant complaint raises allegations not previously addressed in the first complaint, and adds an additional party, the Department does not treat this as a successive complaint.

solicited or received contributions for the purpose of making an expenditure to Unlock Michigan or any other ballot question committee.”²

Mr. LaBrant provided a rebuttal statement. In his rebuttal, Mr. LaBrant cited the failure of MCFR or MMM to provide financial statements or other information showing that the organizations did not violate the MCFA as evidence that the organizations had in fact violated the Act.

On October 8, 2021, the Department requested that MCFR and MMM provide the Department with IRS Form 990s for calendar year 2019 and 2020. The Department also requested that each organization provide the date and amount of each donation received in excess of \$500 or expenditure made in excess of \$500 between January 1, 2020 and the present, as well as the total value of assets controlled by each organization after each of those donations and expenditures. MCFR and MMM each provided a Form 990 for calendar year 2019 but declined to provide a Form 990 for calendar year 2020 and declined to provide the requested information about expenditures, contributions, and assets.

In Michigan, a committee is an organization which “receives contributions or makes expenditures for the purpose of influencing or attempting to influence the action of the voters for or against the nomination or election of a candidate, the qualification, passage, or defeat of a ballot question, or the qualification of a new political party, if contributions received total \$500.00 or more in a calendar year or expenditures made total \$500.00 or more in a calendar year.” MCL 169.203(4). The MCFA requires committees to file certain campaign statements detailing contributions and expenditures. See, e.g., MCL 169.234. Failure to file these required statements can result in civil and criminal penalties. *Id.* An organization making an expenditure to a ballot question committee is not a committee under the MCFA and is not subject to the reporting requirements of the MCFA, however, unless that organization “solicits or receives contributions for the purpose of making an expenditure to that ballot question committee.” MCL 169.203(4). Upon meeting the definition of committee, the organization is obligated to file a statement of organization with the appropriate filing official within 10 days of the committee’s formation, MCL 169.224, and is also required to file various campaign statements detailing the organization’s contributions and expenditures.

As discussed below, the Department finds that there may be reason to believe that MCFR and MMM violated the MCFA. Both MCFR and MMM may have taken actions that qualify each organization as ballot question committees under the MCFA. At the end of calendar year 2019, MCFR had \$715,137 in assets, and MMM had \$172,452 in assets. From June to October 2020, MCFR contributed approximately \$1,780,000 to Unlock, while MMM contributed

² For the reasons more fully set forth below, despite these statements presented in the affidavit, they are not enough to overcome the other evidence submitted.

approximately \$550,000. In each case, the contributions by each organization to Unlock during 2020 far exceeds the assets controlled by each entity at the start of 2020. Moreover, the contributions by MCFR and/or MMM to Unlock were often made within days of similarly sized payments by Unlock to NPM, as set out in the following chart:

Date	Contributing Organization	Amount Contributed to Unlock	Amount Paid by Unlock to NPM
June 9, 2020	MCFR	\$10,000	-
June 18, 2020	MCFR	\$150,000	-
June 24, 2020	MCFR	\$400,000	-
June 25, 2020	-	-	\$300,000
July 20, 2020	MCFR	\$100,000	-
July 21, 2020	-	-	\$100,276.21
July 31, 2020	MCFR	\$35,000	\$100,000
August 3, 2020	-	-	\$44,784.85
August 6, 2020	MCFR	\$150,000	-
August 6, 2020	MMM	\$100,000	\$228,212
August 14, 2020	MCFR	\$25,000	-
August 20, 2020	MMM	\$100,000	-
August 21, 2020	MCFR	\$110,000	-
August 21, 2020	MMM	\$100,000	\$330,000
August 27, 2020	MCFR	\$700,000	-
August 28, 2020	-	-	\$166,248.86
August 31, 2020	-	-	\$160,317.68
September 11, 2020	-	-	\$183,298.30
September 18, 2020	-	-	\$150,000
October 1, 2020	MCFR	\$100,000	-
October 1, 2020	MMM	\$150,000	-
October 5, 2020	-	-	\$218,203.96
October 21, 2020	MMM	\$100,000	-

Given that contributions by MCFR and MMM to Unlock were closely followed by expenditures Unlock made to NPM totaling an almost identical value, it is clear that MCFR and MMM coordinated to some extent with Unlock. Accounting for the assets controlled by each organization at the end of calendar year 2019, between January 1, 2020, and October 1, 2020, MCFR solicited/received at least \$1,064,863 in contributions, while between January 1, 2020, and October 21, 2020, MMM solicited/received at least \$377,548.

As previously stated, it is not a violation of the Act for a group to raise funds in its normal course of conduct and make contributions to a ballot question committee or to coordinate with that ballot question committee. It is, however, a violation of the Act for an organization to raise

money on behalf of the ballot question committee in order to shield the organization's donors from the reporting requirements of the Act. The fundraising necessary to allow MCFR to contribute \$1,780,000 to Unlock and MMM to contribute \$550,000 to Unlock from June to October 2020 is substantial. Although it may be possible that each entity raised those funds in the first half of 2020 independently of each entity's support for Unlock, to assume that the aggressive fundraising activity necessary for each organization to raise the sums that were then transferred to Unlock was completely independent strains credulity. The disparity between each organization's assets going into 2020, the amount that each organization contributed to Unlock, and the timing of those contributions demonstrate a level of coordination showing the entities were not independent of each other.

In particular, the number of payments that MCFR and/or MMM made to Unlock days before Unlock made similarly sized payments to NPM suggests that MCFR and MMM were soliciting or receiving funds for the purpose of collecting contributions with the intent of financially supporting Unlock. Such fundraising for the purpose of supporting a ballot question committee, as is evidenced in the instant case, makes MCFR and MMM themselves ballot question committees responsible for registration and for filing appropriate campaign statements under the MCFA, but neither organization, to date, has registered as a committee nor filed those campaign statements as required by sections 24 and 33 of the Act.

Given the coordination between Unlock, the proximity of contributions made to Unlock and the expenditures made by Unlock, and the fact that neither MCFR nor MMM would have been able to make such contributions to Unlock without soliciting/receiving additional funds during 2020, there is reason to believe that MCFR and MMM may have solicited/received funds for the purpose of making contributions to Unlock.

When presented with a complaint, the Department is tasked to determine "whether or not there may be reason to believe that a violation of [the MCFA] occurred."³ MCL 169.15(10). Once the

³ The MCFA directs the Department to initiate the resolution process if "there may be reason to believe that a violation of [the MCFA] occurred." MCL 169.15(10). The Department notes that, under federal law, the Federal Election Commission (FEC) will initiate an investigation into a campaign finance complaint if the Commission finds that "reason to believe that a violation of [federal law] has occurred or is about to occur." 11 CFR § 111.10. The FEC will find that "reason to believe" a violation has occurred or is about to occur when "the available evidence in the matter is at least sufficient to warrant conducting an investigation, and where the seriousness of the alleged violation warrants either further investigation or immediate conciliation." Federal Election Commission; Policy Statement; Commission Action in Matters at the Initial Stage in the Enforcement Process, 72 Fed. Reg. 51, 12545 (March 16, 2007). Because the MCFA sets a lower threshold for the Department to initiate an informal resolution process – whether there "*may be* reason to believe that a violation of [the MCFA] occurred" (emphasis added) – than federal law sets for the FEC to initiate an investigation – whether there *is* "reason to believe" – the Department's longstanding practice is to initiate the informal resolution process when the evidence available to the Department at the time that a determination is issued can reasonably support an inference that the MCFA has been violated.

Department has made this determination, the Department must employ “informal methods such as a conference [or] conciliation” to correct the potential violation or to prevent further violation. *Id.* As part of the informal resolution process, parties may furnish the Department with evidence showing that a potential violation of the MCFA has not actually occurred. It is possible that MCFR and/or MMM can provide information tending to show that its fundraising activities in 2020 were in fact independent of subsequent or concurrent donations to Unlock, and thus demonstrate that MCFR and/or MMM are not ballot question committees regulated by the MCFA. However, such information has not been made available to the Department, and the evidence available to the Department at this time suggests that “there may be reason to believe” that MCFR and MMM “solicit[ed] or receiv[ed] contributions for the purpose of making an expenditure” to Unlock, and thus that MCFR and MMM are ballot question committees under the MCFA with corresponding and unfulfilled filing obligations.

This letter serves to notify you and your clients that the Department has determined there may be reason to believe that your clients have violated the Act, and serves to notify you and your clients that the Department is beginning the informal resolution process. “If, after 90 business days, the secretary of state is unable to correct or prevent further violation by these informal methods, the secretary of state shall do either of the following:

- (a) Refer the matter to the attorney general for the enforcement of any criminal penalty provided by this act.
- (b) Commence a hearing as provided in subsection (11) for enforcement of any civil violation.”

MCL 169.215(11).

Please contact the undersigned at fracassia@michigan.gov by 5:00 p.m. on Friday, November 5 to discuss a resolution to matter, including additional information your clients may be able to provide that may affect the Department’s determination of the scope of any violation that may have occurred.

Sincerely,



Adam Fracassi
Bureau of Elections



STATE OF MICHIGAN
JOCELYN BENSON, SECRETARY OF STATE
DEPARTMENT OF STATE
LANSING

August 29, 2022

Road to Michigan's Future
P.O. Box 12248
Lansing, MI 48901

Re: *The Foundation for Accountability and Civic Trust v. Road to Michigan's Future*
Campaign Finance Complaint No. 2022-07-44-215

Dear Road to Michigan's Future:

The Department of State (Department) has received a formal complaint filed against you by The Foundation for Accountability and Civic Trust alleging that you violated the Michigan Campaign Finance Act (MCFA or Act). Specifically, the complaint alleges that you solicited or received funds to your organizations for the purpose of collecting contributions with the intent of financially supporting the ballot question committee Keep Michigan Safe. A copy of the complaint is included with this notice.

As the Department stated in a 2020 campaign finance complaint determination,¹ "it is not a violation of the Act for a group to raise funds in its normal course of conduct and make contributions to a ballot question committee or to coordinate with that ballot question committee. It is, however, a violation of the Act for an organization to raise money on behalf of the ballot question committee in order to shield the organization's donors from the reporting requirements of the Act." The complaint alleges that your groups' activities amount to such a violation.

If, as the complainant alleges, you solicited or received contributions for the purpose of making an expenditure to a ballot question committee, and if you met applicable contribution and expenditure thresholds, you would be required to file as a ballot question committee yourselves, and to report and publicly disclose certain information. MCL 169.203(4), MCL 169.234.

The purpose of this letter is to inform you of the Department's examination of these matters and your right to respond to the allegations before the Department proceeds further. It is important to understand that the Department is neither making this complaint nor accepting the allegations as true. The investigation and resolution of this complaint is governed by section 15 of the Act and

¹ *LaBrant v. Michigan Citizens for Fiscal Responsibility, Michigan! My Michigan!*, MI Campaign Finance Complaint filed May, 25, 2021 (decision filed Oct. 27, 2021)

the corresponding administrative rules, R 169.51 *et seq.* An explanation of the process is included in the enclosed guidebook.

If you wish to file a written response to this complaint, you are required to do so within 15 business days of the date of this letter. Your response may include any written statement or additional documentary evidence you wish to submit. Materials may be emailed to BOERegulatory@michigan.gov or mailed to the Department of State, Bureau of Elections, Richard H. Austin Building, 1st Floor, 430 West Allegan Street, Lansing, Michigan 48918. If you fail to submit a response, the Department will render a decision based on the evidence furnished by the complainant.

A copy of your answer will be provided to The Foundation for Accountability and Civic Trust, who will have an opportunity to submit a rebuttal statement to the Department. After reviewing the statements and materials provided by the parties, the Department will determine whether “there may be reason to believe that a violation of [the MCFA] has occurred [.]” MCL 169.215(10). Note that the Department’s enforcement powers include the possibility of entering a conciliation agreement, conducting an administrative hearing, or referring this matter to the Attorney General for enforcement of the penalty provided in section 33(11) of the Act.

If you have any questions concerning this matter, you may contact the Regulatory Section of the Bureau of Elections at BOERegulatory@michigan.gov.

Sincerely,

Regulatory Section
Bureau of Elections
Michigan Department of State

From: MDOS-BOERegulatory
Sent: Tuesday, September 27, 2022 9:16 AM
To: info@factdc.org
Subject: RE: Status of Complaints
Attachments: 2022.09.16 Response (ACLU Natl) Foundation v. ACLU, Sixteen thirty.pdf; 2022.09.19 evidence (Sixteen thirty) Foundation v. ACLU, Sixteen thirty.pdf; 2022.09.19 Response (Sixteen thirty) Foundation v. ACLU, Sixteen thirty.pdf; 2022.09.20 Rebuttal letter Foundation v. ACLU, Sixteen thirteen.pdf

Dear Ms. Arnold,
Notices of all five complaints were mailed on August 29, 2022, to the addresses you provided for the respondents and to you. Your delayed receipt of the notices is an indication of the delays in mail delivery. We have received responses from both respondents in your "Michiganders for Fair Lending" complaint and mailed those responses to you on September 20, 2022. They are also included here, and I will make a note to conduct all further correspondence with you via email. The other respondents have been issued second notices of the complaint.

Regulatory Section
Bureau of Elections
Michigan Department of State

From: info@factdc.org <info@factdc.org>
Sent: Tuesday, September 27, 2022 8:45 AM
To: MDOS-BOERegulatory <MDOS-BOERegulatory@michigan.gov>
Subject: RE: Status of Complaints

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

Good morning, and thank you for your response below. Could you please advise me as to the status of these complaints? In the past couple of weeks I received copies of the letters dated August 29, 2022, notifying the respondents in two of the five complaints. It appears the deadline for the respondents to respond to the complaints was September 19, 2022.

Because our organization has received only two of the five letters and they were mailed to us weeks later, we want to ensure we are receiving your correspondence. Also, if possible, we'd appreciate it if we could be emailed copies of all correspondence as well. Thank you,

Kendra

Kendra Arnold
Executive Director of the Foundation for Accountability and Civic Trust

----- Original Message -----

Subject: RE: Status of Complaints
From: "MDOS-BOERegulatory" <MDOS-BOERegulatory@michigan.gov>
Date: 8/30/22 8:29 am

To: "info@factdc.org" <info@factdc.org>

Dear Ms. Arnold,

Notices regarding those complaints have been sent to the applicable respondents. We will send along their responses as we receive them.

Thank you,

Regulatory Section

Bureau of Elections

Michigan Department of State

From: info@factdc.org <info@factdc.org>

Sent: Friday, August 26, 2022 11:20 AM

To: SOS, Disclosure <Disclosure@michigan.gov>

Subject: Status of Complaints

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

Good morning. Our organization filed the complaint attached and four other on July 6 and 7. All were filed by email and mail. Can you please advise me as to their status?

Thank you,

Kenra Arnold

Executive Director of FACT

----- Original Message -----

Subject: Campaign Finance Complaint against Bipartisan Solutions

From: "info@factdc.org" <info@factdc.org>

Date: 7/6/22 7:33 pm

To: "elections@michigan.gov" <elections@michigan.gov>

Good evening,

Please find attached a campaign finance complaint against Bipartisan Solutions. Please let us know if you require a paper copy to be delivered to your office. Thank you,

Kendra Arnold

Executive Director

The Foundation for Accountability and Civic Trust

Christopher M. Trebilcock
T (313) 965-8575
F (313) 309-6910
Email: ctrebilcock@ClarkHill.com

Clark Hill
500 Woodward Ave., Suite 3500
Detroit, MI 48226
T (313) 965-8300
F (313) 965-8252

October 11, 2022

Via Email

Adam Fracassi
Michigan Department of State
Bureau of Elections
Richard H. Austin Building – 1st Floor
430 W. Allegan St.
Lansing, MI 48918
FracassiA@michigan.gov
disclosure@michigan.gov

**Re: Response to Complaint – *The Foundation for Accountability and Civic Trust v. Road to Michigan’s Future*
Campaign Finance Complaint No. 2022-07-44-215**

Dear Mr. Fracassi:

As you know, this law firm represents Road to Michigan’s Future (“RTMF”). Please allow this correspondence to serve as RTMF’s formal response¹ to the Complaint filed by the Foundation for Accountability and Civic Trust (“FACT”). There is no factual or legal basis for the Complaint and it should be summarily dismissed.

As a preliminary matter, some background information about FACT is warranted. FACT describes itself as a “nonprofit organization dedicated to promoting accountability, ethics, and transparency in government and civic arenas.” (See Complaint at 1.) In reality, FACT is a right-wing group that is largely funded by other right-wing groups and donors, such as Donors Trust and Charles Koch. Despite claiming to be nonpartisan, during the time that former Trump administration Acting Attorney General Matthew Whitaker served as FACT’s Executive Director (October 2014 to September 2017), FACT called for ethics investigations into or filed complaints about at least forty-six different Democratic politicians, officials, and organizations. During that same time period, FACT only called for investigations into or filed complaints against a handful

¹ Under applicable law and guidelines, RTMF’s response to the August 29, 2022 Notice of Complaint would have been due on September 20, 2022. On September 13, 2022, RTMF sought and obtained from you a 15 business day extension of its response deadline to October 11, 2022. Therefore, RTMF’s response is timely.

of Republican individuals or groups. See [Here's a List of Democrats Acting AG Matt Whitaker Wanted to Investigate](#). While serving as FACT's Executive Director, Whitaker called for a special counsel to investigate Hillary Clinton's emails. See [Matthew Whitaker, the New Acting Attorney General, Was Obsessed With Clinton's Emails](#). Experts at the non-profit watchdog CharityWatch have raised concerns that FACT's partisan activities might violate the IRS ban on engagement for or against candidates. See [Matthew Whitaker Led Foundation That May Have Violated Tax Exempt Status](#). It appears that FACT's tactics have remained the same despite a change in leadership.

On the merits, FACT's Complaint appears to be nothing more than a tit-for-tat complaint based on the findings of apparent unlawful activity by other Republican-tied not-for-profit organizations and is devoid of any actual evidence and apparently, investigation.

As you know, the Bureau of Elections ("BOE") determined that Michigan Citizens for Fiscal Responsibility ("MCFR") and Michigan! My Michigan! ("MMM") may have violated the Michigan Campaign Finance Act ("MCFA") by raising funds on behalf of the ballot question committee Unlock Michigan and failing to register as a ballot question committee under the MCFA. (Ex. 1, BOE Determination.) FACT, lazily, reasons that RTMF must have done so too in its support of Keep Michigan Safe, the ballot question committee opposing Unlock Michigan. (See Complaint at 2, 11–12.) However, the differences between RTMF's activities and those of MCFR and MMM could not be more pronounced.

Relevant to the BOE's determination that MCFR and MMM may have violated the MCFA in supporting Unlock Michigan (Ex. 1, BOE Determination) were these facts:

- At the end of 2019, MCFR only had \$715,137.00 in assets and MMM had \$172,452 in assets.
- From June to October 2020 (*i.e.*, 5 months), MCFR contributed approximately \$1,780,000 to Unlock Michigan while MMM contributed \$550,000. In regard to this spending, the BOE observed that "the contributions of each organization to Unlock during 2020 ***far exceeds the assets controlled by each entity at the start of 2020.***" (emphasis added).
- That the contributions by MCFR or MMM to Unlock Michigan were often made within days of similarly sized payments by Unlock Michigan to National Petition Management, Unlock Michigan's outside signature-gathering firm. As the BOE aptly observed, "the contributions by MCFR and MMM to Unlock were closely followed by expenditures Unlock made to NPM ***totaling an almost identical value***[".] (emphasis added). Indeed, according to the BOE, "the number of payments that MCFR and/or MMM made to Unlock days before Unlock made similarly sized payments to NPM suggests that MCFR and MMM ***were soliciting or receiving funds for the purpose of collecting contributions with the intent of financially supporting Unlock.***" (emphasis added).

According to the BOE, these facts – that is, “[t]he disparity between each organization’s assets going into 2020, the amount each organization contributed to Unlock, and the timing of those contributions” – established “a level of coordination showing the entities were not independent of each other.”

None of these facts are present with respect to RTMF or its activities.

First, as shown in RTMF’s publicly available IRS Form 990, in 2020, RTMF contributed \$750,000 to Keep Michigan Safe. (Ex. 2, Form 990, at Schedule I.) Keep Michigan Safe reported receiving that contribution on July 31, 2020.² In that same year, RTMF donated \$800,000 to the 21st Century Fund; \$488,000 to The Voting Project; \$100,000 to Justice for All; \$50,000 to the League of Conservation Voters Education Fund; \$10,000 to Moving NC Forward; and, \$20,000 to America Works USA. (*Id.*) Stated differently, of the \$2,218,000 in grants that RTMF made in 2020, 66% were to organizations other than Keep Michigan Safe. MCFR and MMM submitted no such evidence showing that they made contributions to organizations and groups other than Unlock Michigan.

Second, unlike MCFR and MMM, RTMF had sufficient funds prior to Keep Michigan Safe’s formation on July 3, 2020 to make the full amount of the contribution that it made to Keep Michigan Safe without any additional fundraising. As of July 1, 2020, RTMF had received \$2,527,575 in contributions and had spent \$1,685,538.25, leaving \$842,036.75.³ Thus, unlike the case with MCFR and MMM, RTMF did not need to conduct additional fundraising or make solicitations to contribute to Keep Michigan Safe on July 31, 2020.

Third, there is no pattern of contributions and expenditures suggesting that RTMF acted as a conduit to contributions and expenditures by Keep Michigan Safe. As the BOE recognized in the case of Unlock Michigan, in the days following receipt of large contributions from MCFR or MMM, a nearly identical expenditure would be made by Unlock Michigan. In fact, Unlock Michigan’s 2020 Annual Report shows that the committee received \$1,868,010.03 in contributions in 2020, almost all of it from MCFR or MMM, and made 68 expenditures in almost the exact amount of \$1,888,898.61. In stark contrast, Keep Michigan Safe made only 17 expenditures in 2020, none until over two-and-a-half months after it received the contribution from RTMF, and totaling only \$495,362.77 (*i.e.*, only 66% of the funds contributed by RTMF and 62% of all contributions received in 2020). There is no pattern of disguised fundraising and expenditures in this case.

Fourth, and finally, Keep Michigan Safe, unlike Unlock Michigan, maintained a robust independent fundraising campaign. (Ex. 3, Fundraising Emails.) From Keep Michigan Safe’s

² Keep Michigan Safe October 2020 Quarterly Report available for viewing here: <https://cfrsearch.nictusa.com/documents/501339/details/filing/contributions?schedule=1A&changes=0&page=1>

³ If requested, RTMF will submit an affidavit to the BOE of a RTMF Board member attesting to the truth of this fact.

Response to Complaint No. 2022-07-44-215

October 11, 2022

Page 4

formation in July 2020 through December 31, 2020, Keep Michigan Safe raised \$63,736.23 from 2,552 contributions. Over that same period, Unlock Michigan had only received 772 contributions from individuals or groups other than MCFR or MMM.

At bottom, FACT's Complaint fails to allege any facts showing that RTMF was soliciting or receiving contributions for the express purpose of making an expenditure to Keep Michigan Safe in violation of MCL 169.203(4). As shown above, RTMF was engaged in a host of fundraising and grant making activities supporting a wide array of groups across the United States in 2020. Considering the evidence and correctly applying MCL 169.203, the Complaint is not – and cannot be – supported by any evidence that RTMF solicited or received contributions for the purpose of making an expenditure to Keep Michigan Safe. The lack of evidence is dispositive and must result in the dismissal of FACT's frivolous and retaliatory Complaint.

Thank you for your attention to this matter. Please contact our office if you have any questions or require any additional information.

Sincerely,

CLARK HILL



Christopher M. Trebilcock

CMT:vcs

Exhibits

EXHIBIT 1



STATE OF MICHIGAN
JOCELYN BENSON, SECRETARY OF STATE
DEPARTMENT OF STATE
LANSING

October 27, 2021

Brian D. Shekell
Clark Hill
500 Woodward Ave., Suite 3500
Detroit, MI 48226

Dear Mr. Shekell:

The Department of State (Department) has finished its initial investigation of the campaign finance complaint filed against your clients Michigan Citizens for Fiscal Responsibility (MCFR) and Michigan! My Michigan! (MMM), as well as against Unlock Michigan (Unlock), by Robert LaBrant alleging violations of the Michigan Campaign Finance Act (MCFA or Act). This letter concerns the current disposition of the complaint against your clients.

The complaint alleged that MCFR and MMM solicited or received donations for the purpose of making expenditures to Unlock. Unlock is a ballot question committee regulated by the MCFA. In support of these claims, Mr. LaBrant stated that MCFR and MMM together contributed over \$2.3 million in funding to Unlock from June to October 2020, “nearly 86%” of Unlock’s total funding during that period. The complaint also showed that MCFR and/or MMM frequently provided large amounts of funding to Unlock within days of Unlock making a large payment to the outside signature-gathering firm National Petition Management (NPM).

MCFR and MMM also jointly responded to the complaint.¹ In their response, MCFR and MMM claimed that neither organization “solicited or received contributions for the purpose of making an expenditure to Unlock Michigan or any other ballot question committee.” MCFR and MMM included a September 9, 2020 affidavit from Heather Lombardini stating that “MCFR ha[d] not

¹ MCFR and MMM also alleged that the instant complaint should be dismissed as a successive complaint. However, as indicated in the Department’s April 9, 2021 dismissal to Mr. LaBrant, the prior complaint asked the Department only to investigate whether 5 contributions were violative of the Act. Because the instant complaint raises allegations not previously addressed in the first complaint, and adds an additional party, the Department does not treat this as a successive complaint.

solicited or received contributions for the purpose of making an expenditure to Unlock Michigan or any other ballot question committee.”²

Mr. LaBrant provided a rebuttal statement. In his rebuttal, Mr. LaBrant cited the failure of MCFR or MMM to provide financial statements or other information showing that the organizations did not violate the MCFA as evidence that the organizations had in fact violated the Act.

On October 8, 2021, the Department requested that MCFR and MMM provide the Department with IRS Form 990s for calendar year 2019 and 2020. The Department also requested that each organization provide the date and amount of each donation received in excess of \$500 or expenditure made in excess of \$500 between January 1, 2020 and the present, as well as the total value of assets controlled by each organization after each of those donations and expenditures. MCFR and MMM each provided a Form 990 for calendar year 2019 but declined to provide a Form 990 for calendar year 2020 and declined to provide the requested information about expenditures, contributions, and assets.

In Michigan, a committee is an organization which “receives contributions or makes expenditures for the purpose of influencing or attempting to influence the action of the voters for or against the nomination or election of a candidate, the qualification, passage, or defeat of a ballot question, or the qualification of a new political party, if contributions received total \$500.00 or more in a calendar year or expenditures made total \$500.00 or more in a calendar year.” MCL 169.203(4). The MCFA requires committees to file certain campaign statements detailing contributions and expenditures. See, e.g., MCL 169.234. Failure to file these required statements can result in civil and criminal penalties. *Id.* An organization making an expenditure to a ballot question committee is not a committee under the MCFA and is not subject to the reporting requirements of the MCFA, however, unless that organization “solicits or receives contributions for the purpose of making an expenditure to that ballot question committee.” MCL 169.203(4). Upon meeting the definition of committee, the organization is obligated to file a statement of organization with the appropriate filing official within 10 days of the committee’s formation, MCL 169.224, and is also required to file various campaign statements detailing the organization’s contributions and expenditures.

As discussed below, the Department finds that there may be reason to believe that MCFR and MMM violated the MCFA. Both MCFR and MMM may have taken actions that qualify each organization as ballot question committees under the MCFA. At the end of calendar year 2019, MCFR had \$715,137 in assets, and MMM had \$172,452 in assets. From June to October 2020, MCFR contributed approximately \$1,780,000 to Unlock, while MMM contributed

² For the reasons more fully set forth below, despite these statements presented in the affidavit, they are not enough to overcome the other evidence submitted.

approximately \$550,000. In each case, the contributions by each organization to Unlock during 2020 far exceeds the assets controlled by each entity at the start of 2020. Moreover, the contributions by MCFR and/or MMM to Unlock were often made within days of similarly sized payments by Unlock to NPM, as set out in the following chart:

Date	Contributing Organization	Amount Contributed to Unlock	Amount Paid by Unlock to NPM
June 9, 2020	MCFR	\$10,000	-
June 18, 2020	MCFR	\$150,000	-
June 24, 2020	MCFR	\$400,000	-
June 25, 2020	-	-	\$300,000
July 20, 2020	MCFR	\$100,000	-
July 21, 2020	-	-	\$100,276.21
July 31, 2020	MCFR	\$35,000	\$100,000
August 3, 2020	-	-	\$44,784.85
August 6, 2020	MCFR	\$150,000	-
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August 31, 2020	-	-	\$160,317.68
September 11, 2020	-	-	\$183,298.30
September 18, 2020	-	-	\$150,000
October 1, 2020	MCFR	\$100,000	-
October 1, 2020	MMM	\$150,000	-
October 5, 2020	-	-	\$218,203.96
October 21, 2020	MMM	\$100,000	-

Given that contributions by MCFR and MMM to Unlock were closely followed by expenditures Unlock made to NPM totaling an almost identical value, it is clear that MCFR and MMM coordinated to some extent with Unlock. Accounting for the assets controlled by each organization at the end of calendar year 2019, between January 1, 2020, and October 1, 2020, MCFR solicited/received at least \$1,064,863 in contributions, while between January 1, 2020, and October 21, 2020, MMM solicited/received at least \$377,548.

As previously stated, it is not a violation of the Act for a group to raise funds in its normal course of conduct and make contributions to a ballot question committee or to coordinate with that ballot question committee. It is, however, a violation of the Act for an organization to raise

money on behalf of the ballot question committee in order to shield the organization's donors from the reporting requirements of the Act. The fundraising necessary to allow MCFR to contribute \$1,780,000 to Unlock and MMM to contribute \$550,000 to Unlock from June to October 2020 is substantial. Although it may be possible that each entity raised those funds in the first half of 2020 independently of each entity's support for Unlock, to assume that the aggressive fundraising activity necessary for each organization to raise the sums that were then transferred to Unlock was completely independent strains credulity. The disparity between each organization's assets going into 2020, the amount that each organization contributed to Unlock, and the timing of those contributions demonstrate a level of coordination showing the entities were not independent of each other.

In particular, the number of payments that MCFR and/or MMM made to Unlock days before Unlock made similarly sized payments to NPM suggests that MCFR and MMM were soliciting or receiving funds for the purpose of collecting contributions with the intent of financially supporting Unlock. Such fundraising for the purpose of supporting a ballot question committee, as is evidenced in the instant case, makes MCFR and MMM themselves ballot question committees responsible for registration and for filing appropriate campaign statements under the MCFA, but neither organization, to date, has registered as a committee nor filed those campaign statements as required by sections 24 and 33 of the Act.

Given the coordination between Unlock, the proximity of contributions made to Unlock and the expenditures made by Unlock, and the fact that neither MCFR nor MMM would have been able to make such contributions to Unlock without soliciting/receiving additional funds during 2020, there is reason to believe that MCFR and MMM may have solicited/received funds for the purpose of making contributions to Unlock.

When presented with a complaint, the Department is tasked to determine "whether or not there may be reason to believe that a violation of [the MCFA] occurred."³ MCL 169.15(10). Once the

³ The MCFA directs the Department to initiate the resolution process if "there may be reason to believe that a violation of [the MCFA] occurred." MCL 169.15(10). The Department notes that, under federal law, the Federal Election Commission (FEC) will initiate an investigation into a campaign finance complaint if the Commission finds that "reason to believe that a violation of [federal law] has occurred or is about to occur." 11 CFR § 111.10. The FEC will find that "reason to believe" a violation has occurred or is about to occur when "the available evidence in the matter is at least sufficient to warrant conducting an investigation, and where the seriousness of the alleged violation warrants either further investigation or immediate conciliation." Federal Election Commission; Policy Statement; Commission Action in Matters at the Initial Stage in the Enforcement Process, 72 Fed. Reg. 51, 12545 (March 16, 2007). Because the MCFA sets a lower threshold for the Department to initiate an informal resolution process – whether there "*may be* reason to believe that a violation of [the MCFA] occurred" (emphasis added) - than federal law sets for the FEC to initiate an investigation – whether there *is* "reason to believe" – the Department's longstanding practice is to initiate the informal resolution process when the evidence available to the Department at the time that a determination is issued can reasonably support an inference that the MCFA has been violated.

Department has made this determination, the Department must employ “informal methods such as a conference [or] conciliation” to correct the potential violation or to prevent further violation. *Id.* As part of the informal resolution process, parties may furnish the Department with evidence showing that a potential violation of the MCFA has not actually occurred. It is possible that MCFR and/or MMM can provide information tending to show that its fundraising activities in 2020 were in fact independent of subsequent or concurrent donations to Unlock, and thus demonstrate that MCFR and/or MMM are not ballot question committees regulated by the MCFA. However, such information has not been made available to the Department, and the evidence available to the Department at this time suggests that “there may be reason to believe” that MCFR and MMM “solicit[ed] or receiv[ed] contributions for the purpose of making an expenditure” to Unlock, and thus that MCFR and MMM are ballot question committees under the MCFA with corresponding and unfulfilled filing obligations.

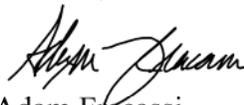
This letter serves to notify you and your clients that the Department has determined there may be reason to believe that your clients have violated the Act, and serves to notify you and your clients that the Department is beginning the informal resolution process. “If, after 90 business days, the secretary of state is unable to correct or prevent further violation by these informal methods, the secretary of state shall do either of the following:

- (a) Refer the matter to the attorney general for the enforcement of any criminal penalty provided by this act.
- (b) Commence a hearing as provided in subsection (11) for enforcement of any civil violation.”

MCL 169.215(11).

Please contact the undersigned at fracassia@michigan.gov by 5:00 p.m. on Friday, November 5 to discuss a resolution to matter, including additional information your clients may be able to provide that may affect the Department’s determination of the scope of any violation that may have occurred.

Sincerely,



Adam Fracassi
Bureau of Elections

EXHIBIT 2

IRS e-file Signature Authorization for an Exempt Organization

For calendar year 2020, or fiscal year beginning JAN 15, 2020, and ending DEC 31, 2020

2020

Department of the Treasury
Internal Revenue Service

▶ Do not send to the IRS. Keep for your records.

▶ Go to www.irs.gov/Form8879EO for the latest information.

Name of exempt organization or person subject to tax

Taxpayer identification number

ROAD TO MICHIGAN'S FUTURE

84-4298056

Name and title of officer or person subject to tax

**RICHARD WEINER
PRESIDENT**

Part I Type of Return and Return Information (Whole Dollars Only)

Check the box for the return for which you are using this Form 8879-EO and enter the applicable amount, if any, from the return. If you check the box on line 1a, 2a, 3a, 4a, 5a, 6a, or 7a below, and the amount on that line for the return being filed with this form was blank, then leave line 1b, 2b, 3b, 4b, 5b, 6b, or 7b, whichever is applicable, blank (do not enter -0-). But, if you entered -0- on the return, then enter -0- on the applicable line below. Do not complete more than one line in Part I.

1a Form 990 check here	<input checked="" type="checkbox"/>	b Total revenue, if any (Form 990, Part VIII, column (A), line 12)	1b	<u>6,492,805.</u>
2a Form 990-EZ check here	<input type="checkbox"/>	b Total revenue, if any (Form 990-EZ, line 9)	2b	
3a Form 1120-POL check here	<input type="checkbox"/>	b Total tax (Form 1120 POL, line 22)	3b	
4a Form 990-PF check here	<input type="checkbox"/>	b Tax based on investment income (Form 990-PF, Part VI, line 5)	4b	
5a Form 8868 check here	<input type="checkbox"/>	b Balance due (Form 8868, line 3c)	5b	
6a Form 990-T check here	<input type="checkbox"/>	b Total tax (Form 990-T, Part III, line 4)	6b	
7a Form 4720 check here	<input type="checkbox"/>	b Total tax (Form 4720, Part III, line 1)	7b	

Part II Declaration and Signature Authorization of Officer or Person Subject to Tax

Under penalties of perjury, I declare that I am an officer of the above organization or I am a person subject to tax with respect to (name of organization) _____, (EIN) _____ and that I have examined a copy of the 2020 electronic return and accompanying schedules and statements, and, to the best of my knowledge and belief, they are true, correct, and complete. I further declare that the amount in Part I above is the amount shown on the copy of the electronic return. I consent to allow my intermediate service provider, transmitter, or electronic return originator (ERO) to send the return to the IRS and to receive from the IRS (a) an acknowledgement of receipt or reason for rejection of the transmission, (b) the reason for any delay in processing the return or refund, and (c) the date of any refund. If applicable, I authorize the U.S. Treasury and its designated Financial Agent to initiate an electronic funds withdrawal (direct debit) entry to the financial institution account indicated in the tax preparation software for payment of the federal taxes owed on this return, and the financial institution to debit the entry to this account. To revoke a payment, I must contact the U.S. Treasury Financial Agent at 1-888-353-4537 no later than 2 business days prior to the payment (settlement) date. I also authorize the financial institutions involved in the processing of the electronic payment of taxes to receive confidential information necessary to answer inquiries and resolve issues related to the payment. I have selected a personal identification number (PIN) as my signature for the electronic return and, if applicable, the consent to electronic funds withdrawal.

PIN: check one box only

I authorize CLARK HILL PLC to enter my PIN 65089
ERO firm name Enter five numbers, but do not enter all zeros

as my signature on the tax year 2020 electronically filed return. If I have indicated within this return that a copy of the return is being filed with a state agency(ies) regulating charities as part of the IRS Fed/State program, I also authorize the aforementioned ERO to enter my PIN on the return's disclosure consent screen.

As an officer or person subject to tax with respect to the organization, I will enter my PIN as my signature on the tax year 2020 electronically filed return. If I have indicated within this return that a copy of the return is being filed with a state agency(ies) regulating charities as part of the IRS Fed/State program, I will enter my PIN on the return's disclosure consent screen.

Signature of officer or person subject to tax ▶

Date ▶

Part III Certification and Authentication

ERO's EFIN/PIN. Enter your six-digit electronic filing identification number (EFIN) followed by your five-digit self-selected PIN

38257042531

Do not enter all zeros

I certify that the above numeric entry is my PIN, which is my signature on the 2020 electronically filed return indicated above. I confirm that I am submitting this return in accordance with the requirements of Pub. 4163, Modernized e File (MeF) Information for Authorized IRS e-file Providers for Business Returns.

ERO's signature ▶ CLARK HILL PLC Date ▶ 11-2-2021

**ERO Must Retain This Form - See Instructions
Do Not Submit This Form to the IRS Unless Requested To Do So**

Form **990**

Return of Organization Exempt From Income Tax

OMB No 1545-0047

Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except private foundations)

2020

Department of the Treasury
Internal Revenue Service

▶ Do not enter social security numbers on this form as it may be made public.
▶ Go to www.irs.gov/Form990 for instructions and the latest information.

Open to Public Inspection

A For the 2020 calendar year, or tax year beginning **JAN 15, 2020** and ending **DEC 31, 2020**

B Check if applicable: <input type="checkbox"/> Address change <input type="checkbox"/> Name change <input checked="" type="checkbox"/> Initial return <input type="checkbox"/> Final return/terminated <input type="checkbox"/> Amended return <input type="checkbox"/> Application pending	C Name of organization ROAD TO MICHIGAN'S FUTURE Doing business as Number and street (or P.O. box if mail is not delivered to street address) Room/suite PO BOX 12284 City or town, state or province, country, and ZIP or foreign postal code LANSING, MI 48901 F Name and address of principal officer RICHARD WEINER SAME AS C ABOVE	D Employer identification number 84-4298056 E Telephone number 517-927-5179 G Gross receipts \$ 6,492,805. H(a) Is this a group return for subordinates? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H(b) Are all subordinates included? <input type="checkbox"/> Yes <input type="checkbox"/> No If "No," attach a list See instructions H(c) Group exemption number ▶
I Tax exempt status: <input type="checkbox"/> 501(c)(3) <input checked="" type="checkbox"/> 501(c) (4) ◀ (insert no) <input type="checkbox"/> 4947(a)(1) or <input type="checkbox"/> 527		
J Website: ▶ N/A		
K Form of organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Trust <input type="checkbox"/> Association <input type="checkbox"/> Other ▶		
L Year of formation. 2020 M State of legal domicile. MI		

Part I Summary

Activities & Governance	1 Briefly describe the organization's mission or most significant activities TO CONDUCT EDUCATIONAL RESEARCH AND ANALYSES TO INFORM THE PUBLIC ON PUBLIC POLICIES AND ISSUES OF 2 Check this box <input type="checkbox"/> if the organization discontinued its operations or disposed of more than 25% of its net assets 3 Number of voting members of the governing body (Part VI, line 1a) 3 3 4 Number of independent voting members of the governing body (Part VI, line 1b) 4 3 5 Total number of individuals employed in calendar year 2020 (Part V, line 2a) 5 0 6 Total number of volunteers (estimate if necessary) 6 0 7 a Total unrelated business revenue from Part VIII, column (C), line 12 7a 0. b Net unrelated business taxable income from Form 990 T, Part I, line 11 7b 0.																									
Revenue		<table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th style="text-align: center;">Prior Year</th> <th style="text-align: center;">Current Year</th> </tr> </thead> <tbody> <tr> <td>8 Contributions and grants (Part VIII, line 1h)</td> <td></td> <td style="text-align: right;">6,492,805.</td> </tr> <tr> <td>9 Program service revenue (Part VIII, line 2g)</td> <td></td> <td style="text-align: right;">0.</td> </tr> <tr> <td>10 Investment income (Part VIII, column (A), lines 3, 4, and 7d)</td> <td></td> <td style="text-align: right;">0.</td> </tr> <tr> <td>11 Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e)</td> <td></td> <td style="text-align: right;">0.</td> </tr> <tr> <td>12 Total revenue - add lines 8 through 11 (must equal Part VIII, column (A), line 12)</td> <td></td> <td style="text-align: right;">6,492,805.</td> </tr> </tbody> </table>		Prior Year	Current Year	8 Contributions and grants (Part VIII, line 1h)		6,492,805.	9 Program service revenue (Part VIII, line 2g)		0.	10 Investment income (Part VIII, column (A), lines 3, 4, and 7d)		0.	11 Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e)		0.	12 Total revenue - add lines 8 through 11 (must equal Part VIII, column (A), line 12)		6,492,805.						
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Part II Signature Block

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge

Sign Here	Signature of officer RICHARD WEINER, PRESIDENT Type or print name and title	Date
Paid Preparer Use Only	Print/Type preparer's name ROBIN D FERRIBY	Preparer's signature Date
	Firm's name ▶ CLARK HILL PLC Firm's address ▶ 151 S OLD WOODWARD AVE, SUITE 200 BIRMINGHAM, MI 48009	Check if self employed <input type="checkbox"/> PTIN P01512050 Firm's EIN ▶ 38-0425840 Phone no. (248) 642-9692

May the IRS discuss this return with the preparer shown above? See instructions Yes No

Part III Statement of Program Service Accomplishments

Check if Schedule O contains a response or note to any line in this Part III

X

1 Briefly describe the organization's mission:

TO CONDUCT EDUCATIONAL RESEARCH AND ANALYSES TO INFORM THE PUBLIC ON PUBLIC POLICIES AND ISSUES OF CONCERN TO AND AFFECTING THE QUALITY OF LIFE FOR MICHIGAN RESIDENTS; TO PROVIDE AN UNDERSTANDING OF HOW CURRENT POLICY INITIATIVES WILL AFFECT THE WELL-BEING OF MICHIGAN

2 Did the organization undertake any significant program services during the year which were not listed on the prior Form 990 or 990-EZ?

Yes No X

If "Yes," describe these new services on Schedule O

3 Did the organization cease conducting, or make significant changes in how it conducts, any program services?

Yes No X

If "Yes," describe these changes on Schedule O.

4 Describe the organization's program service accomplishments for each of its three largest program services, as measured by expenses.

Section 501(c)(3) and 501(c)(4) organizations are required to report the amount of grants and allocations to others, the total expenses, and revenue, if any, for each program service reported.

4a (Code) (Expenses \$ 2,218,000. including grants of \$ 2,218,000.) (Revenue \$)

ADVOCACY OF ORGANIZATION MISSION

4b (Code) (Expenses \$ 1,398,940. including grants of \$) (Revenue \$)

ADVERTISING TO PROMOTE THE ORGANIZATION'S MISSION.

4c (Code) (Expenses \$ 640,249. including grants of \$) (Revenue \$)

EVENTS, RESEARCH AND STAFF EXPENSES TO PROMOTE ORGANIZATION'S MISSION

4d Other program services (Describe on Schedule O)

(Expenses \$ including grants of \$) (Revenue \$)

4e Total program service expenses 4,257,189.

Part IV Checklist of Required Schedules

	Yes	No
1 Is the organization described in section 501(c)(3) or 4947(a)(1) (other than a private foundation)? <i>If "Yes," complete Schedule A</i>		X
2 Is the organization required to complete Schedule B, Schedule of Contributors?	X	
3 Did the organization engage in direct or indirect political campaign activities on behalf of or in opposition to candidates for public office? <i>If "Yes," complete Schedule C, Part I</i>	X	
4 Section 501(c)(3) organizations. Did the organization engage in lobbying activities, or have a section 501(h) election in effect during the tax year? <i>If "Yes," complete Schedule C, Part II</i>		
5 Is the organization a section 501(c)(4), 501(c)(5), or 501(c)(6) organization that receives membership dues, assessments, or similar amounts as defined in Revenue Procedure 98-19? <i>If "Yes," complete Schedule C, Part III</i>		X
6 Did the organization maintain any donor advised funds or any similar funds or accounts for which donors have the right to provide advice on the distribution or investment of amounts in such funds or accounts? <i>If "Yes," complete Schedule D, Part I</i>		X
7 Did the organization receive or hold a conservation easement, including easements to preserve open space, the environment, historic land areas, or historic structures? <i>If "Yes," complete Schedule D, Part II</i>		X
8 Did the organization maintain collections of works of art, historical treasures, or other similar assets? <i>If "Yes," complete Schedule D, Part III</i>		X
9 Did the organization report an amount in Part X, line 21, for escrow or custodial account liability, serve as a custodian for amounts not listed in Part X; or provide credit counseling, debt management, credit repair, or debt negotiation services? <i>If "Yes," complete Schedule D, Part IV</i>		X
10 Did the organization, directly or through a related organization, hold assets in donor restricted endowments or in quasi endowments? <i>If "Yes," complete Schedule D, Part V</i>		X
11 If the organization's answer to any of the following questions is "Yes," then complete Schedule D, Parts VI, VII, VIII, IX, or X as applicable.		
a Did the organization report an amount for land, buildings, and equipment in Part X, line 10? <i>If "Yes," complete Schedule D, Part VI</i>		X
b Did the organization report an amount for investments - other securities in Part X, line 12, that is 5% or more of its total assets reported in Part X, line 16? <i>If "Yes," complete Schedule D, Part VII</i>		X
c Did the organization report an amount for investments - program related in Part X, line 13, that is 5% or more of its total assets reported in Part X, line 16? <i>If "Yes," complete Schedule D, Part VIII</i>		X
d Did the organization report an amount for other assets in Part X, line 15, that is 5% or more of its total assets reported in Part X, line 16? <i>If "Yes," complete Schedule D, Part IX</i>		X
e Did the organization report an amount for other liabilities in Part X, line 25? <i>If "Yes," complete Schedule D, Part X</i>		X
f Did the organization's separate or consolidated financial statements for the tax year include a footnote that addresses the organization's liability for uncertain tax positions under FIN 48 (ASC 740)? <i>If "Yes," complete Schedule D, Part X</i>		X
12a Did the organization obtain separate, independent audited financial statements for the tax year? <i>If "Yes," complete Schedule D, Parts XI and XII</i>		X
b Was the organization included in consolidated, independent audited financial statements for the tax year? <i>If "Yes," and if the organization answered "No" to line 12a, then completing Schedule D, Parts XI and XII is optional</i>		X
13 Is the organization a school described in section 170(b)(1)(A)(ii)? <i>If "Yes," complete Schedule E</i>		X
14a Did the organization maintain an office, employees, or agents outside of the United States?		X
b Did the organization have aggregate revenues or expenses of more than \$10,000 from grantmaking, fundraising, business, investment, and program service activities outside the United States, or aggregate foreign investments valued at \$100,000 or more? <i>If "Yes," complete Schedule F, Parts I and IV</i>		X
15 Did the organization report on Part IX, column (A), line 3, more than \$5,000 of grants or other assistance to or for any foreign organization? <i>If "Yes," complete Schedule F, Parts II and IV</i>		X
16 Did the organization report on Part IX, column (A), line 3, more than \$5,000 of aggregate grants or other assistance to or for foreign individuals? <i>If "Yes," complete Schedule F, Parts III and IV</i>		X
17 Did the organization report a total of more than \$15,000 of expenses for professional fundraising services on Part IX, column (A), lines 6 and 11e? <i>If "Yes," complete Schedule G, Part I</i>	X	
18 Did the organization report more than \$15,000 total of fundraising event gross income and contributions on Part VIII, lines 1c and 8a? <i>If "Yes," complete Schedule G, Part II</i>		X
19 Did the organization report more than \$15,000 of gross income from gaming activities on Part VIII, line 9a? <i>If "Yes," complete Schedule G, Part III</i>		X
20a Did the organization operate one or more hospital facilities? <i>If "Yes," complete Schedule H</i>		X
b If "Yes" to line 20a, did the organization attach a copy of its audited financial statements to this return?		
21 Did the organization report more than \$5,000 of grants or other assistance to any domestic organization or domestic government on Part IX, column (A), line 1? <i>If "Yes," complete Schedule I, Parts I and II</i>	X	

Part IV Checklist of Required Schedules (continued)

	Yes	No
22 Did the organization report more than \$5,000 of grants or other assistance to or for domestic individuals on Part IX, column (A), line 2? <i>If "Yes," complete Schedule I, Parts I and III</i>		X
23 Did the organization answer "Yes" to Part VII, Section A, line 3, 4, or 5 about compensation of the organization's current and former officers, directors, trustees, key employees, and highest compensated employees? <i>If "Yes," complete Schedule J</i>		X
24a Did the organization have a tax-exempt bond issue with an outstanding principal amount of more than \$100,000 as of the last day of the year, that was issued after December 31, 2002? <i>If "Yes," answer lines 24b through 24d and complete Schedule K. If "No," go to line 25a</i>		X
24b Did the organization invest any proceeds of tax exempt bonds beyond a temporary period exception?		
24c Did the organization maintain an escrow account other than a refunding escrow at any time during the year to defease any tax-exempt bonds?		
24d Did the organization act as an "on behalf of" issuer for bonds outstanding at any time during the year?		
25a Section 501(c)(3), 501(c)(4), and 501(c)(29) organizations. Did the organization engage in an excess benefit transaction with a disqualified person during the year? <i>If "Yes," complete Schedule L, Part I</i>		X
25b Is the organization aware that it engaged in an excess benefit transaction with a disqualified person in a prior year, and that the transaction has not been reported on any of the organization's prior Forms 990 or 990-EZ? <i>If "Yes," complete Schedule L, Part I</i>		X
26 Did the organization report any amount on Part X, line 5 or 22, for receivables from or payables to any current or former officer, director, trustee, key employee, creator or founder, substantial contributor, or 35% controlled entity or family member of any of these persons? <i>If "Yes," complete Schedule L, Part II</i>		X
27 Did the organization provide a grant or other assistance to any current or former officer, director, trustee, key employee, creator or founder, substantial contributor or employee thereof, a grant selection committee member, or to a 35% controlled entity (including an employee thereof) or family member of any of these persons? <i>If "Yes," complete Schedule L, Part III</i>		X
28 Was the organization a party to a business transaction with one of the following parties (see Schedule L, Part IV instructions, for applicable filing thresholds, conditions, and exceptions)		
28a A current or former officer, director, trustee, key employee, creator or founder, or substantial contributor? <i>If "Yes," complete Schedule L, Part IV</i>		X
28b A family member of any individual described in line 28a? <i>If "Yes," complete Schedule L, Part IV</i>		X
28c A 35% controlled entity of one or more individuals and/or organizations described in lines 28a or 28b? <i>If "Yes," complete Schedule L, Part IV</i>		X
29 Did the organization receive more than \$25,000 in non cash contributions? <i>If "Yes," complete Schedule M</i>		X
30 Did the organization receive contributions of art, historical treasures, or other similar assets, or qualified conservation contributions? <i>If "Yes," complete Schedule M</i>		X
31 Did the organization liquidate, terminate, or dissolve and cease operations? <i>If "Yes," complete Schedule N, Part I</i>		X
32 Did the organization sell, exchange, dispose of, or transfer more than 25% of its net assets? <i>If "Yes," complete Schedule N, Part II</i>		X
33 Did the organization own 100% of an entity disregarded as separate from the organization under Regulations sections 301.7701-2 and 301.7701-3? <i>If "Yes," complete Schedule R, Part I</i>		X
34 Was the organization related to any tax-exempt or taxable entity? <i>If "Yes," complete Schedule R, Part II, III, or IV, and Part V, line 1</i>		X
35a Did the organization have a controlled entity within the meaning of section 512(b)(13)?		X
35b If "Yes" to line 35a, did the organization receive any payment from or engage in any transaction with a controlled entity within the meaning of section 512(b)(13)? <i>If "Yes," complete Schedule R, Part V, line 2</i>		
36 Section 501(c)(3) organizations. Did the organization make any transfers to an exempt non-charitable related organization? <i>If "Yes," complete Schedule R, Part V, line 2</i>		
37 Did the organization conduct more than 5% of its activities through an entity that is not a related organization and that is treated as a partnership for federal income tax purposes? <i>If "Yes," complete Schedule R, Part VI</i>		X
38 Did the organization complete Schedule O and provide explanations in Schedule O for Part VI, lines 11b and 19?	X	

Note: All Form 990 filers are required to complete Schedule O

Part V Statements Regarding Other IRS Filings and Tax Compliance

Check if Schedule O contains a response or note to any line in this Part V

	Yes	No
1a Enter the number reported in Box 3 of Form 1096. Enter -0- if not applicable		
1b Enter the number of Forms W-2G included in line 1a. Enter -0- if not applicable		
1c Did the organization comply with backup withholding rules for reportable payments to vendors and reportable gaming (gambling) winnings to prize winners?		

Part V Statements Regarding Other IRS Filings and Tax Compliance (continued)

		Yes	No
2a	Enter the number of employees reported on Form W-3, Transmittal of Wage and Tax Statements, filed for the calendar year ending with or within the year covered by this return		
	2a 0		
b	If at least one is reported on line 2a, did the organization file all required federal employment tax returns? Note: If the sum of lines 1a and 2a is greater than 250, you may be required to e-file (see instructions)	2b	
3a	Did the organization have unrelated business gross income of \$1,000 or more during the year?	3a	X
b	If "Yes," has it filed a Form 990-T for this year? If "No" to line 3b, provide an explanation on Schedule O	3b	
4a	At any time during the calendar year, did the organization have an interest in, or a signature or other authority over, a financial account in a foreign country (such as a bank account, securities account, or other financial account)?	4a	X
b	If "Yes," enter the name of the foreign country <input type="checkbox"/> _____ See instructions for filing requirements for FinCEN Form 114, Report of Foreign Bank and Financial Accounts (FBAR)		
5a	Was the organization a party to a prohibited tax shelter transaction at any time during the tax year?	5a	X
b	Did any taxable party notify the organization that it was or is a party to a prohibited tax shelter transaction?	5b	X
c	If "Yes" to line 5a or 5b, did the organization file Form 8886 T?	5c	
6a	Does the organization have annual gross receipts that are normally greater than \$100,000, and did the organization solicit any contributions that were not tax deductible as charitable contributions?	6a	X
b	If "Yes," did the organization include with every solicitation an express statement that such contributions or gifts were not tax deductible?	6b	X
7	Organizations that may receive deductible contributions under section 170(c).		
a	Did the organization receive a payment in excess of \$75 made partly as a contribution and partly for goods and services provided to the payor?	7a	
b	If "Yes," did the organization notify the donor of the value of the goods or services provided?	7b	
c	Did the organization sell, exchange, or otherwise dispose of tangible personal property for which it was required to file Form 8282?	7c	
d	If "Yes," indicate the number of Forms 8282 filed during the year	7d	
e	Did the organization receive any funds, directly or indirectly, to pay premiums on a personal benefit contract?	7e	
f	Did the organization, during the year, pay premiums, directly or indirectly, on a personal benefit contract?	7f	
g	If the organization received a contribution of qualified intellectual property, did the organization file Form 8899 as required?	7g	
h	If the organization received a contribution of cars, boats, airplanes, or other vehicles, did the organization file a Form 1098 C?	7h	
8	Sponsoring organizations maintaining donor advised funds. Did a donor advised fund maintained by the sponsoring organization have excess business holdings at any time during the year?	8	
9	Sponsoring organizations maintaining donor advised funds.		
a	Did the sponsoring organization make any taxable distributions under section 4966?	9a	
b	Did the sponsoring organization make a distribution to a donor, donor advisor, or related person?	9b	
10	Section 501(c)(7) organizations. Enter		
a	Initiation fees and capital contributions included on Part VIII, line 12	10a	
b	Gross receipts, included on Form 990, Part VIII, line 12, for public use of club facilities	10b	
11	Section 501(c)(12) organizations. Enter.		
a	Gross income from members or shareholders	11a	
b	Gross income from other sources (Do not net amounts due or paid to other sources against amounts due or received from them)	11b	
12a	Section 4947(a)(1) non-exempt charitable trusts. Is the organization filing Form 990 in lieu of Form 1041?	12a	
b	If "Yes," enter the amount of tax-exempt interest received or accrued during the year	12b	
13	Section 501(c)(29) qualified nonprofit health insurance issuers.		
a	Is the organization licensed to issue qualified health plans in more than one state? Note: See the instructions for additional information the organization must report on Schedule O	13a	
b	Enter the amount of reserves the organization is required to maintain by the states in which the organization is licensed to issue qualified health plans	13b	
c	Enter the amount of reserves on hand	13c	
14a	Did the organization receive any payments for indoor tanning services during the tax year?	14a	X
b	If "Yes," has it filed a Form 720 to report these payments? If "No," provide an explanation on Schedule O	14b	
15	Is the organization subject to the section 4960 tax on payment(s) of more than \$1,000,000 in remuneration or excess parachute payment(s) during the year? If "Yes," see instructions and file Form 4720, Schedule N	15	X
16	Is the organization an educational institution subject to the section 4968 excise tax on net investment income? If "Yes," complete Form 4720, Schedule O	16	X

Part VI Governance, Management, and Disclosure For each "Yes" response to lines 2 through 7b below, and for a "No" response to line 8a, 8b, or 10b below, describe the circumstances, processes, or changes on Schedule O. See instructions.

Check if Schedule O contains a response or note to any line in this Part VI

Section A. Governing Body and Management

		Yes	No
1a	Enter the number of voting members of the governing body at the end of the tax year. If there are material differences in voting rights among members of the governing body, or if the governing body delegated broad authority to an executive committee or similar committee, explain on Schedule O.		
1b	Enter the number of voting members included on line 1a, above, who are independent.		
2	Did any officer, director, trustee, or key employee have a family relationship or a business relationship with any other officer, director, trustee, or key employee?		X
3	Did the organization delegate control over management duties customarily performed by or under the direct supervision of officers, directors, trustees, or key employees to a management company or other person?		X
4	Did the organization make any significant changes to its governing documents since the prior Form 990 was filed?		X
5	Did the organization become aware during the year of a significant diversion of the organization's assets?		X
6	Did the organization have members or stockholders?		X
7a	Did the organization have members, stockholders, or other persons who had the power to elect or appoint one or more members of the governing body?		X
7b	Are any governance decisions of the organization reserved to (or subject to approval by) members, stockholders, or persons other than the governing body?		X
8	Did the organization contemporaneously document the meetings held or written actions undertaken during the year by the following:		
8a	The governing body?	X	
8b	Each committee with authority to act on behalf of the governing body?		X
9	Is there any officer, director, trustee, or key employee listed in Part VII, Section A, who cannot be reached at the organization's mailing address? If "Yes," provide the names and addresses on Schedule O.		X

Section B. Policies (This Section B requests information about policies not required by the Internal Revenue Code.)

		Yes	No
10a	Did the organization have local chapters, branches, or affiliates?		X
10b	If "Yes," did the organization have written policies and procedures governing the activities of such chapters, affiliates, and branches to ensure their operations are consistent with the organization's exempt purposes?		
11a	Has the organization provided a complete copy of this Form 990 to all members of its governing body before filing the form?	X	
11b	Describe in Schedule O the process, if any, used by the organization to review this Form 990.		
12a	Did the organization have a written conflict of interest policy? If "No," go to line 13.		X
12b	Were officers, directors, or trustees, and key employees required to disclose annually interests that could give rise to conflicts?		
12c	Did the organization regularly and consistently monitor and enforce compliance with the policy? If "Yes," describe in Schedule O how this was done.		
13	Did the organization have a written whistleblower policy?		X
14	Did the organization have a written document retention and destruction policy?		X
15	Did the process for determining compensation of the following persons include a review and approval by independent persons, comparability data, and contemporaneous substantiation of the deliberation and decision?		
15a	The organization's CEO, Executive Director, or top management official.	X	
15b	Other officers or key employees of the organization. If "Yes" to line 15a or 15b, describe the process in Schedule O (see instructions).	X	
16a	Did the organization invest in, contribute assets to, or participate in a joint venture or similar arrangement with a taxable entity during the year?		X
16b	If "Yes," did the organization follow a written policy or procedure requiring the organization to evaluate its participation in joint venture arrangements under applicable federal tax law, and take steps to safeguard the organization's exempt status with respect to such arrangements?		

Section C. Disclosure

- 17** List the states with which a copy of this Form 990 is required to be filed **NONE**
- 18** Section 6104 requires an organization to make its Forms 1023 (1024 or 1024 A, if applicable), 990, and 990-T (Section 501(c)(3)s only) available for public inspection. Indicate how you made these available. Check all that apply.
 Own website Another's website Upon request Other (explain on Schedule O)
- 19** Describe on Schedule O whether (and if so, how) the organization made its governing documents, conflict of interest policy, and financial statements available to the public during the tax year.
- 20** State the name, address, and telephone number of the person who possesses the organization's books and records **THE ORGANIZATION - 517-927-5179**
PO BOX 12284, LANSING, MI 48901

Part VIII Statement of Revenue

Check if Schedule O contains a response or note to any line in this Part VIII

		(A)	(B)	(C)	(D)	
		Total revenue	Related or exempt function revenue	Unrelated business revenue	Revenue excluded from tax under sections 512 - 514	
Contributions, Gifts, Grants and Other Similar Amounts	1 a Federated campaigns	1a				
	b Membership dues	1b				
	c Fundraising events	1c				
	d Related organizations	1d				
	e Government grants (contributions)	1e				
	f All other contributions, gifts, grants, and similar amounts not included above	1f 6,492,805.				
	g Noncash contributions included in lines 1a-1f	1g \$				
	h Total. Add lines 1a-1f		6,492,805.			
	Program Service Revenue	2 a _____	Business Code			
b _____						
c _____						
d _____						
e _____						
f All other program service revenue						
g Total. Add lines 2a-2f						
Other Revenue	3 Investment income (including dividends, interest, and other similar amounts)					
	4 Income from investment of tax exempt bond proceeds					
	5 Royalties					
	6 a Gross rents	6a	(i) Real	(ii) Personal		
		b Less rental expenses	6b			
		c Rental income or (loss)	6c			
	d Net rental income or (loss)					
	7 a Gross amount from sales of assets other than inventory	7a	(i) Securities	(ii) Other		
		b Less cost or other basis and sales expenses	7b			
		c Gain or (loss)	7c			
	d Net gain or (loss)					
	8 a Gross income from fundraising events (not including \$ _____ of contributions reported on line 1c) See Part IV, line 18	8a				
		b Less direct expenses	8b			
		c Net income or (loss) from fundraising events				
	9 a Gross income from gaming activities See Part IV, line 19	9a				
b Less direct expenses		9b				
c Net income or (loss) from gaming activities						
10 a Gross sales of inventory, less returns and allowances	10a					
	b Less: cost of goods sold	10b				
	c Net income or (loss) from sales of inventory					
Miscellaneous Revenue	11 a _____	Business Code				
	b _____					
	c _____					
	d All other revenue					
	e Total. Add lines 11a-11d					
12 Total revenue See instructions		6,492,805.	0.	0.	0.	

Part IX Statement of Functional Expenses

Section 501(c)(3) and 501(c)(4) organizations must complete all columns. All other organizations must complete column (A).

Check if Schedule O contains a response or note to any line in this Part IX

Do not include amounts reported on lines 6b, 7b, 8b, 9b, and 10b of Part VIII.	(A) Total expenses	(B) Program service expenses	(C) Management and general expenses	(D) Fundraising expenses
1 Grants and other assistance to domestic organizations and domestic governments. See Part IV, line 21	2,218,000.	2,218,000.		
2 Grants and other assistance to domestic individuals See Part IV, line 22				
3 Grants and other assistance to foreign organizations, foreign governments, and foreign individuals See Part IV, lines 15 and 16				
4 Benefits paid to or for members				
5 Compensation of current officers, directors, trustees, and key employees				
6 Compensation not included above to disqualified persons (as defined under section 4958(f)(1)) and persons described in section 4958(c)(3)(B)				
7 Other salaries and wages				
8 Pension plan accruals and contributions (include section 401(k) and 403(b) employer contributions)				
9 Other employee benefits				
10 Payroll taxes				
11 Fees for services (nonemployees)				
a Management				
b Legal	22,808.		22,808.	
c Accounting				
d Lobbying				
e Professional fundraising services. See Part IV, line 17	81,500.			81,500.
f Investment management fees				
g Other. (If line 11g amount exceeds 10% of line 25, column (A) amount, list line 11g expenses on Sch O.)	285,155.	285,155.		
12 Advertising and promotion	1,398,940.	1,398,940.		
13 Office expenses				
14 Information technology				
15 Royalties				
16 Occupancy				
17 Travel				
18 Payments of travel or entertainment expenses for any federal, state, or local public officials				
19 Conferences, conventions, and meetings	31,038.	31,038.		
20 Interest				
21 Payments to affiliates				
22 Depreciation, depletion, and amortization				
23 Insurance				
24 Other expenses. Itemize expenses not covered above (List miscellaneous expenses on line 24e. If line 24e amount exceeds 10% of line 25, column (A) amount, list line 24e expenses on Schedule O.)				
a NON-EMPLOYEE COMPENSATION	324,056.	324,056.		
b OPERATIONS EXPENSES	35,740.		35,740.	
c PAYCHEX FEE	10,754.		10,754.	
d WIRE FEES	435.		435.	
e All other expenses _____	315.		315.	
25 Total functional expenses. Add lines 1 through 24e	4,408,741.	4,257,189.	70,052.	81,500.
26 Joint costs Complete this line only if the organization reported in column (B) joint costs from a combined educational campaign and fundraising solicitation.				

Check here if following SOP 98-2 (ASC 958-720)

Part X Balance Sheet

Check if Schedule O contains a response or note to any line in this Part X

		(A) Beginning of year	(B) End of year
Assets	1 Cash - non-interest-bearing	1	2,084,064.
	2 Savings and temporary cash investments	2	
	3 Pledges and grants receivable, net	3	
	4 Accounts receivable, net	4	
	5 Loans and other receivables from any current or former officer, director, trustee, key employee, creator or founder, substantial contributor, or 35% controlled entity or family member of any of these persons	5	
	6 Loans and other receivables from other disqualified persons (as defined under section 4958(f)(1)), and persons described in section 4958(c)(3)(B)	6	
	7 Notes and loans receivable, net	7	
	8 Inventories for sale or use	8	
	9 Prepaid expenses and deferred charges	9	
	10a Land, buildings, and equipment. cost or other basis. Complete Part VI of Schedule D	10a	
	b Less accumulated depreciation	10b	10c
	11 Investments - publicly traded securities	11	
	12 Investments - other securities. See Part IV, line 11	12	
	13 Investments - program-related. See Part IV, line 11	13	
	14 Intangible assets	14	
	15 Other assets. See Part IV, line 11	15	
16 Total assets. Add lines 1 through 15 (must equal line 33)	0. 16	2,084,064.	
Liabilities	17 Accounts payable and accrued expenses	17	
	18 Grants payable	18	
	19 Deferred revenue	19	
	20 Tax exempt bond liabilities	20	
	21 Escrow or custodial account liability. Complete Part IV of Schedule D	21	
	22 Loans and other payables to any current or former officer, director, trustee, key employee, creator or founder, substantial contributor, or 35% controlled entity or family member of any of these persons	22	
	23 Secured mortgages and notes payable to unrelated third parties	23	
	24 Unsecured notes and loans payable to unrelated third parties	24	
	25 Other liabilities (including federal income tax, payables to related third parties, and other liabilities not included on lines 17-24). Complete Part X of Schedule D	25	
	26 Total liabilities. Add lines 17 through 25	0. 26	0.
Net Assets or Fund Balances	Organizations that follow FASB ASC 958, check here <input type="checkbox"/> and complete lines 27, 28, 32, and 33.		
	27 Net assets without donor restrictions	27	
	28 Net assets with donor restrictions	28	
	Organizations that do not follow FASB ASC 958, check here <input checked="" type="checkbox"/> and complete lines 29 through 33.		
	29 Capital stock or trust principal, or current funds	0. 29	0.
	30 Paid-in or capital surplus, or land, building, or equipment fund	0. 30	0.
	31 Retained earnings, endowment, accumulated income, or other funds	0. 31	2,084,064.
	32 Total net assets or fund balances	0. 32	2,084,064.
33 Total liabilities and net assets/fund balances	0. 33	2,084,064.	

Part XI Reconciliation of Net Assets

Check if Schedule O contains a response or note to any line in this Part XI

1	Total revenue (must equal Part VIII, column (A), line 12)	1	6,492,805.
2	Total expenses (must equal Part IX, column (A), line 25)	2	4,408,741.
3	Revenue less expenses Subtract line 2 from line 1	3	2,084,064.
4	Net assets or fund balances at beginning of year (must equal Part X, line 32, column (A))	4	0.
5	Net unrealized gains (losses) on investments	5	
6	Donated services and use of facilities	6	
7	Investment expenses	7	
8	Prior period adjustments	8	
9	Other changes in net assets or fund balances (explain on Schedule O)	9	0.
10	Net assets or fund balances at end of year Combine lines 3 through 9 (must equal Part X, line 32, column (B))	10	2,084,064.

Part XII Financial Statements and Reporting

Check if Schedule O contains a response or note to any line in this Part XII

		Yes	No
1	Accounting method used to prepare the Form 990 <input checked="" type="checkbox"/> Cash <input type="checkbox"/> Accrual <input type="checkbox"/> Other _____ If the organization changed its method of accounting from a prior year or checked "Other," explain in Schedule O.		
2a	Were the organization's financial statements compiled or reviewed by an independent accountant? If "Yes," check a box below to indicate whether the financial statements for the year were compiled or reviewed on a separate basis, consolidated basis, or both: <input type="checkbox"/> Separate basis <input type="checkbox"/> Consolidated basis <input type="checkbox"/> Both consolidated and separate basis		<input checked="" type="checkbox"/>
2b	Were the organization's financial statements audited by an independent accountant? If "Yes," check a box below to indicate whether the financial statements for the year were audited on a separate basis, consolidated basis, or both: <input type="checkbox"/> Separate basis <input type="checkbox"/> Consolidated basis <input type="checkbox"/> Both consolidated and separate basis		<input checked="" type="checkbox"/>
2c	If "Yes" to line 2a or 2b, does the organization have a committee that assumes responsibility for oversight of the audit, review, or compilation of its financial statements and selection of an independent accountant? If the organization changed either its oversight process or selection process during the tax year, explain on Schedule O		
3a	As a result of a federal award, was the organization required to undergo an audit or audits as set forth in the Single Audit Act and OMB Circular A-133?		<input checked="" type="checkbox"/>
3b	If "Yes," did the organization undergo the required audit or audits? If the organization did not undergo the required audit or audits, explain why on Schedule O and describe any steps taken to undergo such audits		

Schedule B

(Form 990, 990-EZ, or 990-PF)

Department of the Treasury
Internal Revenue Service**Schedule of Contributors**

- ▶ Attach to Form 990, Form 990-EZ, or Form 990-PF.
- ▶ Go to www.irs.gov/Form990 for the latest information.

OMB No 1545 0047

2020

Name of the organization

Employer identification number

ROAD TO MICHIGAN'S FUTURE

84-4298056

Organization type (check one).

Filers of:**Section:**

Form 990 or 990-EZ

 501(c)(4) (enter number) organization 4947(a)(1) nonexempt charitable trust **not** treated as a private foundation 527 political organization

Form 990 PF

 501(c)(3) exempt private foundation 4947(a)(1) nonexempt charitable trust treated as a private foundation 501(c)(3) taxable private foundationCheck if your organization is covered by the **General Rule** or a **Special Rule**.**Note:** Only a section 501(c)(7), (8), or (10) organization can check boxes for both the General Rule and a Special Rule. See instructions.**General Rule**

- For an organization filing Form 990, 990-EZ, or 990-PF that received, during the year, contributions totaling \$5,000 or more (in money or property) from any one contributor. Complete Parts I and II. See instructions for determining a contributor's total contributions.

Special Rules

- For an organization described in section 501(c)(3) filing Form 990 or 990-EZ that met the 33 1/3% support test of the regulations under sections 509(a)(1) and 170(b)(1)(A)(vi), that checked Schedule A (Form 990 or 990-EZ), Part II, line 13, 16a, or 16b, and that received from any one contributor, during the year, total contributions of the greater of (1) \$5,000; or (2) 2% of the amount on (i) Form 990, Part VIII, line 1h, or (ii) Form 990-EZ, line 1. Complete Parts I and II.
- For an organization described in section 501(c)(7), (8), or (10) filing Form 990 or 990-EZ that received from any one contributor, during the year, total contributions of more than \$1,000 exclusively for religious, charitable, scientific, literary, or educational purposes, or for the prevention of cruelty to children or animals. Complete Parts I (entering "N/A" in column (b) instead of the contributor name and address), II, and III.
- For an organization described in section 501(c)(7), (8), or (10) filing Form 990 or 990-EZ that received from any one contributor, during the year, contributions *exclusively* for religious, charitable, etc., purposes, but no such contributions totaled more than \$1,000. If this box is checked, enter here the total contributions that were received during the year for an *exclusively* religious, charitable, etc., purpose. Don't complete any of the parts unless the **General Rule** applies to this organization because it received *nonexclusively* religious, charitable, etc., contributions totaling \$5,000 or more during the year. ▶ \$ _____

Caution: An organization that isn't covered by the General Rule and/or the Special Rules doesn't file Schedule B (Form 990, 990-EZ, or 990-PF), but it **must** answer "No" on Part IV, line 2, of its Form 990; or check the box on line H of its Form 990-EZ or on its Form 990-PF, Part I, line 2, to certify that it doesn't meet the filing requirements of Schedule B (Form 990, 990-EZ, or 990-PF).

Name of organization ROAD TO MICHIGAN'S FUTURE	Employer identification number 84-4298056
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Part I Contributors (see instructions) Use duplicate copies of Part I if additional space is needed.

(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
1	N/A	\$ 857,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
2	N/A	\$ 50,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
3	N/A	\$ 300,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
4	N/A	\$ 15,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
5	N/A	\$ 200,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
6	N/A	\$ 25,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)

Name of organization ROAD TO MICHIGAN'S FUTURE	Employer identification number 84-4298056
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Part I Contributors (see instructions) Use duplicate copies of Part I if additional space is needed.

(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
7	N/A	\$ 40,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
8	N/A	\$ 75,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
9	N/A	\$ 50,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
10	N/A	\$ 100,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
11	N/A	\$ 25,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
12	N/A	\$ 5,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)

Name of organization ROAD TO MICHIGAN'S FUTURE	Employer identification number 84-4298056
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Part I Contributors (see instructions). Use duplicate copies of Part I if additional space is needed

(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
13	N/A	\$ 150,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
14	N/A	\$ 25,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
15	N/A	\$ 150,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
16	N/A	\$ 150,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
17	N/A	\$ 25,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
18	N/A	\$ 15,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)

Name of organization

Employer identification number

ROAD TO MICHIGAN'S FUTURE

84-4298056

Part I Contributors (see instructions) Use duplicate copies of Part I if additional space is needed

(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
19	N/A	\$ 100,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
20	N/A	\$ 25,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
21	N/A	\$ 10,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
22	N/A	\$ 100,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
23	N/A	\$ 55,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
24	N/A	\$ 25,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)

Name of organization

Employer identification number

ROAD TO MICHIGAN'S FUTURE

84-4298056

Part I Contributors (see instructions) Use duplicate copies of Part I if additional space is needed

(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
25	N/A	\$ 25,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
26	N/A	\$ 5,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
27	N/A	\$ 25,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
28	N/A	\$ 25,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
29	N/A	\$ 5,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
30	N/A	\$ 100,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)

Name of organization

Employer identification number

ROAD TO MICHIGAN'S FUTURE

84-4298056

Part I Contributors (see instructions) Use duplicate copies of Part I if additional space is needed

(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
31	N/A	\$ 250,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
32	N/A	\$ 25,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
33	N/A	\$ 50,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
34	N/A	\$ 10,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
35	N/A	\$ 20,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
36	N/A	\$ 400,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)

Name of organization

Employer identification number

ROAD TO MICHIGAN'S FUTURE

84-4298056

Part I Contributors (see instructions) Use duplicate copies of Part I if additional space is needed

(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
37	N/A	\$ 25,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
38	N/A	\$ 50,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
39	N/A	\$ 150,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
40	N/A	\$ 20,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
41	N/A	\$ 10,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
42	N/A	\$ 300,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)

Name of organization ROAD TO MICHIGAN'S FUTURE	Employer identification number 84-4298056
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Part I Contributors (see instructions) Use duplicate copies of Part I if additional space is needed

(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
43	N/A	\$ 25,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
44	N/A	\$ 5,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
45	N/A	\$ 25,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
46	N/A	\$ 100,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
47	N/A	\$ 75,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
48	N/A	\$ 200,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)

Name of organization ROAD TO MICHIGAN'S FUTURE	Employer identification number 84-4298056
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Part I Contributors (see instructions) Use duplicate copies of Part I if additional space is needed

(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
49	N/A	\$ 75,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
50	N/A	\$ 25,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
51	N/A	\$ 25,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
52	N/A	\$ 100,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
53	N/A	\$ 250,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
54	N/A	\$ 250,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)

Name of organization

Employer identification number

ROAD TO MICHIGAN'S FUTURE

84-4298056

Part I Contributors (see instructions). Use duplicate copies of Part I if additional space is needed

(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
55	N/A	\$ 25,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
56	N/A	\$ 25,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
57	N/A	\$ 120,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
58	N/A	\$ 5,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
59	N/A	\$ 15,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
60	N/A	\$ 25,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)

Name of organization ROAD TO MICHIGAN'S FUTURE	Employer identification number 84-4298056
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Part I Contributors (see instructions) Use duplicate copies of Part I if additional space is needed

(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
61	N/A <hr/> <hr/> <hr/>	\$ 25,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
62	N/A <hr/> <hr/> <hr/>	\$ 25,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
63	N/A <hr/> <hr/> <hr/>	\$ 250,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
64	N/A <hr/> <hr/> <hr/>	\$ 20,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
65	N/A <hr/> <hr/> <hr/>	\$ 10,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
66	N/A <hr/> <hr/> <hr/>	\$ 10,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)

Name of organization ROAD TO MICHIGAN'S FUTURE	Employer identification number 84-4298056
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Part I Contributors (see instructions) Use duplicate copies of Part I if additional space is needed

(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
67	N/A	\$ 15,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
68	N/A	\$ 10,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
69	N/A	\$ 150,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
70	N/A	\$ 15,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
71	N/A	\$ 5,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
72	N/A	\$ 9,605.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)

Name of organization ROAD TO MICHIGAN'S FUTURE	Employer identification number 84-4298056
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Part I Contributors (see instructions) Use duplicate copies of Part I if additional space is needed.

(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
73	N/A <hr/> <hr/> <hr/>	\$ 100,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
74	N/A <hr/> <hr/> <hr/>	\$ 25,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
75	N/A <hr/> <hr/> <hr/>	\$ 10,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
76	N/A <hr/> <hr/> <hr/>	\$ 50,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
77	N/A <hr/> <hr/> <hr/>	\$ 50,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
78	N/A <hr/> <hr/> <hr/>	\$ 100,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)

Name of organization ROAD TO MICHIGAN'S FUTURE	Employer identification number 84-4298056
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Part I Contributors (see instructions). Use duplicate copies of Part I if additional space is needed.

(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
79	N/A	\$ 50,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
80	N/A	\$ 25,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
81	N/A	\$ 50,000.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
_____	_____	\$ _____	Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions)
_____	_____	\$ _____	Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
_____	_____	\$ _____	Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)

Name of organization ROAD TO MICHIGAN'S FUTURE	Employer identification number 84-4298056
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Part II Noncash Property (see instructions) Use duplicate copies of Part II if additional space is needed.

(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions)	(d) Date received
		\$ _____	_____
		\$ _____	_____
		\$ _____	_____
		\$ _____	_____
		\$ _____	_____
		\$ _____	_____
		\$ _____	_____

Name of organization ROAD TO MICHIGAN'S FUTURE	Employer identification number 84-4298056
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Part III Exclusively religious, charitable, etc., contributions to organizations described in section 501(c)(7), (8), or (10) that total more than \$1,000 for the year from any one contributor. Complete columns (a) through (e) and the following line entry. For organizations completing Part III, enter the total of exclusively religious, charitable, etc., contributions of \$1,000 or less for the year (Enter this info once) ► \$ _____
Use duplicate copies of Part III if additional space is needed.

(a) No. from Part I	(b) Purpose of gift	(c) Use of gift	(d) Description of how gift is held
(e) Transfer of gift			
Transferee's name, address, and ZIP + 4		Relationship of transferor to transferee	
(e) Transfer of gift			
Transferee's name, address, and ZIP + 4		Relationship of transferor to transferee	
(e) Transfer of gift			
Transferee's name, address, and ZIP + 4		Relationship of transferor to transferee	
(e) Transfer of gift			
Transferee's name, address, and ZIP + 4		Relationship of transferor to transferee	
(e) Transfer of gift			
Transferee's name, address, and ZIP + 4		Relationship of transferor to transferee	

SCHEDULE C
(Form 990 or 990-EZ)

Political Campaign and Lobbying Activities

OMB No 1545-0047

2020

Open to Public Inspection

Department of the Treasury
Internal Revenue Service

For Organizations Exempt From Income Tax Under section 501(c) and section 527

▶ **Complete if the organization is described below.** ▶ **Attach to Form 990 or Form 990-EZ.**

▶ **Go to www.irs.gov/Form990 for instructions and the latest information.**

If the organization answered "Yes," on Form 990, Part IV, line 3, or Form 990-EZ, Part V, line 46 (Political Campaign Activities), then

- Section 501(c)(3) organizations: Complete Parts I A and B Do not complete Part I-C
- Section 501(c) (other than section 501(c)(3)) organizations: Complete Parts I-A and C below Do not complete Part I-B
- Section 527 organizations: Complete Part I-A only

If the organization answered "Yes," on Form 990, Part IV, line 4, or Form 990-EZ, Part VI, line 47 (Lobbying Activities), then

- Section 501(c)(3) organizations that have filed Form 5768 (election under section 501(h)). Complete Part II-A. Do not complete Part II-B
- Section 501(c)(3) organizations that have NOT filed Form 5768 (election under section 501(h)). Complete Part II-B Do not complete Part II-A

If the organization answered "Yes," on Form 990, Part IV, line 5 (Proxy Tax) (See separate instructions) or Form 990-EZ, Part V, line 35c (Proxy Tax) (See separate instructions), then

- Section 501(c)(4), (5), or (6) organizations. Complete Part III

Name of organization ROAD TO MICHIGAN'S FUTURE	Employer identification number 84-4298056
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Part I-A Complete if the organization is exempt under section 501(c) or is a section 527 organization.

- 1 Provide a description of the organization's direct and indirect political campaign activities in Part IV.
- 2 Political campaign activity expenditures ▶ \$ 800,000.
- 3 Volunteer hours for political campaign activities _____

Part I-B Complete if the organization is exempt under section 501(c)(3).

- 1 Enter the amount of any excise tax incurred by the organization under section 4955 ▶ \$ _____
- 2 Enter the amount of any excise tax incurred by organization managers under section 4955 ▶ \$ _____
- 3 If the organization incurred a section 4955 tax, did it file Form 4720 for this year? Yes No
- 4a Was a correction made? Yes No
- b If "Yes," describe in Part IV

Part I-C Complete if the organization is exempt under section 501(c), except section 501(c)(3).

- 1 Enter the amount directly expended by the filing organization for section 527 exempt function activities ▶ \$ _____
- 2 Enter the amount of the filing organization's funds contributed to other organizations for section 527 exempt function activities ▶ \$ 800,000.
- 3 Total exempt function expenditures Add lines 1 and 2. Enter here and on Form 1120-POL, line 17b ▶ \$ 800,000.
- 4 Did the filing organization file Form 1120-POL for this year? Yes No
- 5 Enter the names, addresses and employer identification number (EIN) of all section 527 political organizations to which the filing organization made payments For each organization listed, enter the amount paid from the filing organization's funds. Also enter the amount of political contributions received that were promptly and directly delivered to a separate political organization, such as a separate segregated fund or a political action committee (PAC) If additional space is needed, provide information in Part IV.

(a) Name	(b) Address	(c) EIN	(d) Amount paid from filing organization's funds If none, enter -0-	(e) Amount of political contributions received and promptly and directly delivered to a separate political organization If none, enter 0-
21ST CENTURY FUND	606 TOWNSEND ST LANSING, MI 48933	38-1323848	800,000.	0.

For Paperwork Reduction Act Notice, see the Instructions for Form 990 or 990-EZ. Schedule C (Form 990 or 990-EZ) 2020

Part II-A Complete if the organization is exempt under section 501(c)(3) and filed Form 5768 (election under section 501(h)).

- A** Check if the filing organization belongs to an affiliated group (and list in Part IV each affiliated group member's name, address, EIN, expenses, and share of excess lobbying expenditures)
- B** Check if the filing organization checked box A and "limited control" provisions apply

Limits on Lobbying Expenditures (The term "expenditures" means amounts paid or incurred.)	(a) Filing organization's totals	(b) Affiliated group totals												
1a Total lobbying expenditures to influence public opinion (grassroots lobbying)														
b Total lobbying expenditures to influence a legislative body (direct lobbying)														
c Total lobbying expenditures (add lines 1a and 1b)														
d Other exempt purpose expenditures														
e Total exempt purpose expenditures (add lines 1c and 1d)														
f Lobbying nontaxable amount Enter the amount from the following table in both columns														
<table border="1" style="width: 100%;"> <thead> <tr> <th style="text-align: left;">If the amount on line 1e, column (a) or (b) is:</th> <th style="text-align: left;">The lobbying nontaxable amount is:</th> </tr> </thead> <tbody> <tr> <td>Not over \$500,000</td> <td>20% of the amount on line 1e</td> </tr> <tr> <td>Over \$500,000 but not over \$1,000,000</td> <td>\$100,000 plus 15% of the excess over \$500,000</td> </tr> <tr> <td>Over \$1,000,000 but not over \$1,500,000</td> <td>\$175,000 plus 10% of the excess over \$1,000,000</td> </tr> <tr> <td>Over \$1,500,000 but not over \$17,000,000</td> <td>\$225,000 plus 5% of the excess over \$1,500,000</td> </tr> <tr> <td>Over \$17,000,000</td> <td>\$1,000,000</td> </tr> </tbody> </table>	If the amount on line 1e, column (a) or (b) is:	The lobbying nontaxable amount is:	Not over \$500,000	20% of the amount on line 1e	Over \$500,000 but not over \$1,000,000	\$100,000 plus 15% of the excess over \$500,000	Over \$1,000,000 but not over \$1,500,000	\$175,000 plus 10% of the excess over \$1,000,000	Over \$1,500,000 but not over \$17,000,000	\$225,000 plus 5% of the excess over \$1,500,000	Over \$17,000,000	\$1,000,000		
If the amount on line 1e, column (a) or (b) is:	The lobbying nontaxable amount is:													
Not over \$500,000	20% of the amount on line 1e													
Over \$500,000 but not over \$1,000,000	\$100,000 plus 15% of the excess over \$500,000													
Over \$1,000,000 but not over \$1,500,000	\$175,000 plus 10% of the excess over \$1,000,000													
Over \$1,500,000 but not over \$17,000,000	\$225,000 plus 5% of the excess over \$1,500,000													
Over \$17,000,000	\$1,000,000													
g Grassroots nontaxable amount (enter 25% of line 1f)														
h Subtract line 1g from line 1a. If zero or less, enter -0														
i Subtract line 1f from line 1c. If zero or less, enter 0-														
j If there is an amount other than zero on either line 1h or line 1i, did the organization file Form 4720 reporting section 4911 tax for this year?		<input type="checkbox"/> Yes <input type="checkbox"/> No												

4-Year Averaging Period Under Section 501(h)
(Some organizations that made a section 501(h) election do not have to complete all of the five columns below. See the separate instructions for lines 2a through 2f.)

Lobbying Expenditures During 4-Year Averaging Period					
Calendar year (or fiscal year beginning in)	(a) 2017	(b) 2018	(c) 2019	(d) 2020	(e) Total
2a Lobbying nontaxable amount					
b Lobbying ceiling amount (150% of line 2a, column(e))					
c Total lobbying expenditures					
d Grassroots nontaxable amount					
e Grassroots ceiling amount (150% of line 2d, column (e))					
f Grassroots lobbying expenditures					

Part II-B Complete if the organization is exempt under section 501(c)(3) and has NOT filed Form 5768 (election under section 501(h)).

For each "Yes" response on lines 1a through 1i below, provide in Part IV a detailed description of the lobbying activity

	(a)		(b)
	Yes	No	Amount
1 During the year, did the filing organization attempt to influence foreign, national, state, or local legislation, including any attempt to influence public opinion on a legislative matter or referendum, through the use of			
a Volunteers?			
b Paid staff or management (include compensation in expenses reported on lines 1c through 1i)?			
c Media advertisements?			
d Mailings to members, legislators, or the public?			
e Publications, or published or broadcast statements?			
f Grants to other organizations for lobbying purposes?			
g Direct contact with legislators, their staffs, government officials, or a legislative body?			
h Rallies, demonstrations, seminars, conventions, speeches, lectures, or any similar means?			
i Other activities?			
j Total. Add lines 1c through 1i			
2a Did the activities in line 1 cause the organization to be not described in section 501(c)(3)?			
b If "Yes," enter the amount of any tax incurred under section 4912			
c If "Yes," enter the amount of any tax incurred by organization managers under section 4912			
d If the filing organization incurred a section 4912 tax, did it file Form 4720 for this year?			

Part III-A Complete if the organization is exempt under section 501(c)(4), section 501(c)(5), or section 501(c)(6).

	Yes	No
1 Were substantially all (90% or more) dues received nondeductible by members?	X	
2 Did the organization make only in-house lobbying expenditures of \$2,000 or less?		X
3 Did the organization agree to carry over lobbying and political campaign activity expenditures from the prior year?		X

Part III-B Complete if the organization is exempt under section 501(c)(4), section 501(c)(5), or section 501(c)(6) and if either (a) BOTH Part III-A, lines 1 and 2, are answered "No" OR (b) Part III-A, line 3, is answered "Yes."

1 Dues, assessments and similar amounts from members	1	
2 Section 162(e) nondeductible lobbying and political expenditures (do not include amounts of political expenses for which the section 527(f) tax was paid).		
a Current year	2a	
b Carryover from last year	2b	
c Total	2c	
3 Aggregate amount reported in section 6033(e)(1)(A) notices of nondeductible section 162(e) dues	3	
4 If notices were sent and the amount on line 2c exceeds the amount on line 3, what portion of the excess does the organization agree to carryover to the reasonable estimate of nondeductible lobbying and political expenditure next year?	4	
5 Taxable amount of lobbying and political expenditures (See instructions)	5	

Part IV Supplemental Information

Provide the descriptions required for Part I-A, line 1; Part I-B, line 4; Part I-C, line 5; Part II A (affiliated group list); Part II-A, lines 1 and 2 (See instructions), and Part II-B, line 1. Also, complete this part for any additional information

SCHEDULE G
(Form 990 or 990-EZ)

Supplemental Information Regarding Fundraising or Gaming Activities

OMB No 1545-0047

2020

Open to Public Inspection

Department of the Treasury
Internal Revenue Service

Complete if the organization answered "Yes" on Form 990, Part IV, line 17, 18, or 19, or if the organization entered more than \$15,000 on Form 990-EZ, line 6a.

▶ Attach to Form 990 or Form 990-EZ.

▶ Go to www.irs.gov/Form990 for instructions and the latest information.

Name of the organization

ROAD TO MICHIGAN'S FUTURE

Employer identification number

84-4298056

Part I Fundraising Activities. Complete if the organization answered "Yes" on Form 990, Part IV, line 17. Form 990-EZ filers are not required to complete this part.

1 Indicate whether the organization raised funds through any of the following activities. Check all that apply.

- a Mail solicitations
- b Internet and email solicitations
- c Phone solicitations
- d In-person solicitations
- e Solicitation of non government grants
- f Solicitation of government grants
- g Special fundraising events

2 a Did the organization have a written or oral agreement with any individual (including officers, directors, trustees, or key employees listed in Form 990, Part VII) or entity in connection with professional fundraising services? Yes No

b If "Yes," list the 10 highest paid individuals or entities (fundraisers) pursuant to agreements under which the fundraiser is to be compensated at least \$5,000 by the organization

(i) Name and address of individual or entity (fundraiser)	(ii) Activity	(iii) Did fundraiser have custody or control of contributions?		(iv) Gross receipts from activity	(v) Amount paid to (or retained by) fundraiser listed in col. (i)	(vi) Amount paid to (or retained by) organization
		Yes	No			
LISA PRESTA - 163 FOREST SIDE AVE, SAN FRANCISCO, CA 94127	TELEPHONE/DIRECT CONTACT REQUEST		X	200,000.	25,500.	174,500.
JBW CONSULTING - 601 E 20TH ST, APT 10F, NEW YORK, NY	TELEPHONE/DIRECT CONTACT REQUEST		X	125,000.	18,000.	107,000.
CORNERSTONE STRATEGIC SERVICES - 57 NE 93RD ST, RUE GROUP - 205 E 68TH ST, NEW YORK, NY 10065	TELEPHONE/DIRECT CONTACT REQUEST		X	120,000.	18,000.	102,000.
CAPITAL STRATEGIES - 4712 ADMIRALTY WAY #670, MARINA	TELEPHONE/DIRECT CONTACT REQUEST		X	100,000.	16,000.	84,000.
			X	75,000.	4,000.	71,000.
Total				620,000.	81,500.	538,500.

3 List all states in which the organization is registered or licensed to solicit contributions or has been notified it is exempt from registration or licensing.

Part II Fundraising Events. Complete if the organization answered "Yes" on Form 990, Part IV, line 18, or reported more than \$15,000 of fundraising event contributions and gross income on Form 990-EZ, lines 1 and 6b List events with gross receipts greater than \$5,000.

		(a) Event #1	(b) Event #2	(c) Other events	(d) Total events (add col (a) through col (c))
		(event type)	(event type)	(total number)	
Revenue	1 Gross receipts				
	2 Less. Contributions				
	3 Gross income (line 1 minus line 2)				
Direct Expenses	4 Cash prizes				
	5 Noncash prizes				
	6 Rent/facility costs				
	7 Food and beverages				
	8 Entertainment				
	9 Other direct expenses				
	10 Direct expense summary Add lines 4 through 9 in column (d)				
	11 Net income summary Subtract line 10 from line 3, column (d)				

Part III Gaming. Complete if the organization answered "Yes" on Form 990, Part IV, line 19, or reported more than \$15,000 on Form 990-EZ, line 6a

		(a) Bingo	(b) Pull tabs/instant bingo/progressive bingo	(c) Other gaming	(d) Total gaming (add col. (a) through col (c))
Revenue	1 Gross revenue				
	2 Cash prizes				
Direct Expenses	3 Noncash prizes				
	4 Rent/facility costs				
	5 Other direct expenses				
	6 Volunteer labor	<input type="checkbox"/> Yes _____ % <input type="checkbox"/> No	<input type="checkbox"/> Yes _____ % <input type="checkbox"/> No	<input type="checkbox"/> Yes _____ % <input type="checkbox"/> No	
	7 Direct expense summary Add lines 2 through 5 in column (d)				
	8 Net gaming income summary Subtract line 7 from line 1, column (d)				

9 Enter the state(s) in which the organization conducts gaming activities. _____

a Is the organization licensed to conduct gaming activities in each of these states? Yes No

b If "No," explain: _____

10a Were any of the organization's gaming licenses revoked, suspended, or terminated during the tax year? Yes No

b If "Yes," explain: _____

**SCHEDULE I
(Form 990)**

Department of the Treasury
Internal Revenue Service

**Grants and Other Assistance to Organizations,
Governments, and Individuals in the United States**
Complete if the organization answered "Yes" on Form 990, Part IV, line 21 or 22.
▶ Attach to Form 990.
▶ Go to www.irs.gov/Form990 for the latest information.

OMB No 1545-0047

2020

Open to Public
Inspection

Name of the organization

ROAD TO MICHIGAN'S FUTURE

Employer identification number

84-4298056

Part I General Information on Grants and Assistance

- 1** Does the organization maintain records to substantiate the amount of the grants or assistance, the grantees' eligibility for the grants or assistance, and the selection criteria used to award the grants or assistance? Yes No
- 2** Describe in Part IV the organization's procedures for monitoring the use of grant funds in the United States.

Part II Grants and Other Assistance to Domestic Organizations and Domestic Governments. Complete if the organization answered "Yes" on Form 990, Part IV, line 21, for any recipient that received more than \$5,000. Part II can be duplicated if additional space is needed.

1 (a) Name and address of organization or government	(b) EIN	(c) IRC section (if applicable)	(d) Amount of cash grant	(e) Amount of non-cash assistance	(f) Method of valuation (book, FMV, appraisal, other)	(g) Description of noncash assistance	(h) Purpose of grant or assistance
JUSTICE FOR ALL 113 N MARTINSON WICHITA, KS 67203	48-1128944	501(C)(3)	100,000.	0.			GENERAL SUPPORT
THE VOTING PROJECT PO BOX 480754 CHARLOTTE, NC 28269	83-1292779	501(C)(4)	488,000.	0.			GENERAL SUPPORT
KEEP MI SAFE PO BOX 11032 LANSING, MI 48901	85-1811518		750,000.	0.			GENERAL SUPPORT
MOVING NC FORWARD 434 FAYETTEVILLE ST, #2020 RALEIGH, NC 27601	81-4767705	501(C)(4)	10,000.	0.			GENERAL SUPPORT
21ST CENTURY FUND 606 TOWNSEND ST LANSING, MI 48933	38-1323848	527	800,000.	0.			GENERAL SUPPORT
LEAGUE OF CONSERVATION VOTERS EDUCATION FUND - 740 15TH ST NW, #700 - WASHINGTON, DC 20005	52-1379661	501(C)(3)	50,000.	0.			GENERAL SUPPORT

- 2** Enter total number of section 501(c)(3) and government organizations listed in the line 1 table ▶ _____
- 3** Enter total number of other organizations listed in the line 1 table ▶ _____

LHA For Paperwork Reduction Act Notice, see the Instructions for Form 990.

Schedule I (Form 990) 2020

SCHEDULE O
(Form 990 or 990-EZ)

Department of the Treasury
Internal Revenue Service

Supplemental Information to Form 990 or 990-EZ

Complete to provide information for responses to specific questions on
Form 990 or 990-EZ or to provide any additional information.

▶ Attach to Form 990 or 990-EZ.

▶ Go to www.irs.gov/Form990 for the latest information.

OMB No 1545-0047

2020

Open to Public
Inspection

Name of the organization

ROAD TO MICHIGAN'S FUTURE

Employer identification number

84-4298056

FORM 990, PART I, LINE 1, DESCRIPTION OF ORGANIZATION MISSION:

CONCERN TO AND AFFECTING THE QUALITY OF LIFE FOR MICHIGAN RESIDENTS; TO
PROVIDE AN UNDERSTANDING OF HOW CURRENT POLICY INITIATIVES WILL AFFECT
THE WELL-BEING OF MICHIGAN RESIDENTS, INCLUDING THE IMPORTANCE OF
INVESTING IN STATE AND LOCAL ROADS AND INFRASTRUCTURE.

FORM 990, PART III, LINE 1, DESCRIPTION OF ORGANIZATION MISSION:

RESIDENTS, INCLUDING THE IMPORTANCE OF INVESTING IN STATE AND LOCAL
ROADS AND INFRASTRUCTURE.

FORM 990, PART VI, SECTION A, LINE 8B:

THE ORGANIZATION DOES NOT HAVE ANY COMMITTEES.

FORM 990, PART VI, SECTION B, LINE 11B:

FORM 990 IS PROVIDED TO THE BOARD FOR REVIEW PRIOR TO THE FILING OF THE
RETURN.

FORM 990, PART VI, SECTION B, LINE 15:

AT THE PRESENT TIME, THE ORGANIZATION DOES NOT COMPENSATE A CEO, EXECUTIVE
DIRECTOR, TOP MANAGEMENT, OFFICERS OR KEY EMPLOYEES, BUT IF THERE WERE SUCH
COMPENSATION, THE ORGANIZATION WOULD FOLLOW THE PROCESS OUTLINED ON LINES
15(A) AND 15(B).

FORM 990, PART VI, SECTION C, LINE 19:

GOVERNING DOCUMENTS AND CONFLICT OF INTEREST POLICY ARE AVAILABLE TO THE
PUBLIC BY CONTACTING THE ORGANIZATION.

Application for Automatic Extension of Time To File an Exempt Organization Return

Department of the Treasury
Internal Revenue Service

▶ **File a separate application for each return.**
▶ **Go to www.irs.gov/Form8868 for the latest information.**

Electronic filing (e-file). You can electronically file Form 8868 to request a 6-month automatic extension of time to file any of the forms listed below with the exception of Form 8870, Information Return for Transfers Associated With Certain Personal Benefit Contracts, for which an extension request must be sent to the IRS in paper format (see instructions). For more details on the electronic filing of this form, visit www.irs.gov/e-file-providers/e-file-for-charities-and-non-profits.

Automatic 6-Month Extension of Time. Only submit original (no copies needed).

All corporations required to file an income tax return other than Form 990-T (including 1120-C filers), partnerships, REMICs, and trusts must use Form 7004 to request an extension of time to file income tax returns

Type or print	Name of exempt organization or other filer, see instructions ROAD TO MICHIGAN'S FUTURE	Taxpayer identification number (TIN) 84-4298056
File by the due date for filing your return. See instructions	Number, street, and room or suite no. If a P.O. box, see instructions PO BOX 12284	
	City, town or post office, state, and ZIP code. For a foreign address, see instructions. LANSING, MI 48901	

Enter the Return Code for the return that this application is for (file a separate application for each return) 0 1

Application Is For	Return Code	Application Is For	Return Code
Form 990 or Form 990 EZ	01	Form 990 T (corporation)	07
Form 990-BL	02	Form 1041-A	08
Form 4720 (Individual)	03	Form 4720 (other than individual)	09
Form 990-PF	04	Form 5227	10
Form 990-T (sec. 401(a) or 408(a) trust)	05	Form 6069	11
Form 990-T (trust other than above)	06	Form 8870	12

THE ORGANIZATION

- The books are in the care of ▶ **PO BOX 12284 - LANSING, MI 48901**
Telephone No ▶ **517-927-5179** Fax No. ▶ _____
- If the organization does not have an office or place of business in the United States, check this box
- If this is for a Group Return, enter the organization's four digit Group Exemption Number (GEN) _____. If this is for the whole group, check this box . If it is for part of the group, check this box and attach a list with the names and TINs of all members the extension is for.

1 I request an automatic 6 month extension of time until NOVEMBER 15, 2021, to file the exempt organization return for the organization named above. The extension is for the organization's return for
 ▶ calendar year _____ or
 ▶ tax year beginning JAN 15, 2020, and ending DEC 31, 2020

2 If the tax year entered in line 1 is for less than 12 months, check reason: Initial return Final return
 Change in accounting period

3a If this application is for Forms 990-BL, 990 PF, 990 T, 4720, or 6069, enter the tentative tax, less any nonrefundable credits. See instructions.	3a	\$	0.
b If this application is for Forms 990-PF, 990-T, 4720, or 6069, enter any refundable credits and estimated tax payments made. Include any prior year overpayment allowed as a credit.	3b	\$	0.
c Balance due. Subtract line 3b from line 3a. Include your payment with this form, if required, by using EFTPS (Electronic Federal Tax Payment System). See instructions.	3c	\$	0.

Caution: If you are going to make an electronic funds withdrawal (direct debit) with this Form 8868, see Form 8453 EO and Form 8879-EO for payment instructions

EXHIBIT 3



Keeping Michigan safe should be a nonpartisan issue

1 message

Dr. Joe Schwarz <info@keepmichigansafe.org>
Reply-To: info@keepmichigansafe.org
To: [Redacted]

Thu, Sep 24, 2020 at 5:37 PM



As a leader on the Keep Michigan Safe committee, I fully support Governor Whitmer and the lifesaving actions she has taken and will continue to take to keep Michiganders safe.

I know in today's age everything is polarized by our political parties -- **but keeping Michigan safe should be a nonpartisan issue.**

We need to do everything we can to ensure that Unlock Michigan does not succeed in collecting the last remaining signatures to take away Governor Whitmer's emergency authority. Will you help us fight Unlock Michigan's irresponsible actions with a contribution of \$25 today?

If you've saved your payment information with ActBlue Express, your donation will go through immediately:

- | | |
|----------------|----------------|
| \$10 » | \$25 » |
| <hr/> | <hr/> |
| \$50 » | \$100 » |
| <hr/> | <hr/> |
| \$250 » | Other » |
| <hr/> | <hr/> |

Imagine if we are facing a similar pandemic or natural disaster ten years from now.

The law that Unlock Michigan is trying to repeal would leave future governors powerless and leave Michiganders defenseless in the face of tragedy.

Keep Michigan Safe aims to not only defend our democracy, but also to defend the long-term wellbeing of our great state.

With Unlock Michigan getting closer and closer to their goal, now is the time to act. Please, [REDACTED] make a contribution today to help us stop them in their tracks.

Thank you for keeping Michigan safe,

Dr. Joe Schwarz
Former State Senator
Former U.S. Representative MI-07

Keep Michigan Safe is a broad and diverse coalition formed to protect the executive powers of Michigan's governor during a public health crisis and defeat the cynically named "Unlock Michigan" ballot initiative. We need you to help fight back with a contribution today.

DONATE

Paid for with regulated funds by Keep Michigan Safe

<https://www.KeepMichigansafe.org>

[Report an Unlock Michigan circulator here](#)

Keep Michigan Safe
PO Box 11032
Lansing, MI 48901
United States

If you believe you received this message in error or wish to no longer receive email from us, please [unsubscribe](#).



We're in danger

1 message

Keep Michigan Safe <info@keepmichigansafe.org>

Mon, Sep 14, 2020 at 6:38 PM

Reply-To: info@keepmichigansafe.org

To: [Redacted]



[Redacted]

Governor Whitmer could lose her ability to keep us safe during the pandemic and in the long run because of Unlock Michigan.

We need to protect the Governor's emergency authority by ending the petition drive. [Will you pitch in whatever you can now to join us in stopping this reckless petition?](#)

If you've saved your payment information with ActBlue Express, your donation will go through immediately:

- | | |
|-------------------------|-------------------------|
| \$10 » | \$25 » |
| \$50 » | \$100 » |
| \$250 » | Other » |

Unlock Michigan's goal is to get rid of the Governor's emergency authority and stop her from quickly taking action during events such as COVID-19. **The Republicans running this petition will cause more harm to Michiganders and prevent the saving of lives.**

To be clear, Keep Michigan Safe intends to preserve the governing authority of our state’s executive, including future governors. The Republican-led petition drive not only undermines our safety, but our democracy.

To help preserve both, we need you to chip in today by clicking this link.

If you've saved your payment information with ActBlue Express, your donation will go through immediately:

\$10 »	\$25 »
\$50»	\$100»
\$250»	Other »

Thank you,

Keep Michigan Safe HQ

Keep Michigan Safe is a broad and diverse coalition formed to protect the executive powers of Michigan’s governor during a public health crisis and defeat the cynically named “Unlock Michigan” ballot initiative. We need you to help fight back with a contribution today.

DONATE

Paid for with regulated funds by Keep Michigan Safe

<https://www.keepmichigansafe.org>

Report an Unlock Michigan circulator here

Keep Michigan Safe
PO Box 11032
Lansing, MI 48901
United States

10/6/22, 8:56 PM

Gmail - We're in danger

If you believe you received this message in error or wish to no longer receive email from us, please [unsubscribe](#).



Unscrupulous measures

1 message

Keep Michigan Safe HQ <info@keepmichigansafe.org>

Sat, Aug 29, 2020 at 4:24 PM

Reply-To: info@keepmichigansafe.org

To: [Redacted]



The Republican-led power grab is using unscrupulous measures to collect signatures.

Some petition gatherers have said this partisan measure will help Whitmer or create jobs and help small businesses.

It is all a lie. And they are using these lies to try and strip Governor Whitmer and every future governor's emergency authority.

We need to fight back hard against the partisan petition drive both for now and for future governors. Can we count on you to chip in just \$3 so we can show our strong grassroots movement is ready to put an end to these partisan games?

If you've saved your payment information with ActBlue Express, your donation will go through immediately:

- \$3 »

- \$10 »

- \$25 »

- \$50 »

- \$150 »
- Other »

Thank you,

Keep Michigan Safe HQ

P.S. Stay up to date on the most recent information by liking our Facebook page [here](#).

Keep Michigan Safe is a broad and diverse coalition formed to protect the executive powers of Michigan's governor during a public health crisis and defeat the cynically named "Unlock Michigan" ballot initiative. We need you to help fight back with a contribution today.

DONATE

Paid for with regulated funds by Keep Michigan Safe

<https://www.keepmichigansafe.org>

[Report an Unlock Michigan circulator here](#)

Keep Michigan Safe
PO Box 11032
Lansing, MI 48901
United States

If you believe you received this message in error or wish to no longer receive email from us, please [unsubscribe](#).



DECLINE TO SIGN:

Keep Michigan Safe <keepmichigansafe2020@gmail.com>

Sat, Aug 8, 2020 at 9:51 AM

Reply-To: keepmichigansafe2020@gmail.com

To: 



We need your help, 

There is a dangerous new Republican petition drive dubiously named “Unlock Michigan” that would strip Governor Whitmer of her emergency powers and undermine her ability to keep us safe -- and we are doing everything we can to stop this reckless petition.

To start: Do NOT sign any petitions while you’re safely out and about. They are particularly focused on getting signatures outside of grocery stores and other high foot-traffic places.

Instead, report or record activities of any petition gatherers by making a submission [here](#). And, encourage everyone you know not to sign this dangerous petition.

The Republicans running this petition drive are aiming to take away the Governor’s emergency authority to act quickly in events such as COVID-19. Rather than saving lives, Republicans’ actions will harm Michiganders in the long term.

Make no mistake: Our group, Keep Michigan Safe, is about preserving the governing authority of our state’s executive, whether it be Governor Whitmer or any future Democrat or Republican governor after her.

This dangerous Republican-led petition not only undermines our safety, but also our Democracy -- and we must put an end to it.

Taking away lifesaving executive authority during a pandemic or any natural disaster is irresponsible and reckless. **Saving lives should not be a partisan issue.**

We'll be in touch, and stay safe out there.

-Keep Michigan Safe HQ

Remember, if you see any petition gatherers, help us out by reporting them [here](#).

Keep Michigan Safe is a broad and diverse coalition formed to protect the executive powers of Michigan's governor during a public health crisis and defeat the cynically named "Unlock Michigan" ballot initiative. We need you to help fight back with a contribution today.

DONATE

Paid for with regulated funds by Keep Michigan Safe

<https://www.keepmichigansafe.org>

Keep Michigan Safe
PO Box 11032
Lansing, MI 48901
United States

If you believe you received this message in error or wish to no longer receive email from us, please [unsubscribe](#).



STATE OF MICHIGAN
JOCELYN BENSON, SECRETARY OF STATE
DEPARTMENT OF STATE
LANSING

October 12, 2022

Foundation for Accountability and Civic Trust
Kendra Arnold, Executive Director
1717 K Street NW, Suite 900
Washington, D.C., 20006

Via email

Re: *Foundation for Accountability and Civic Trust v. Road to Michigan's Future*
Campaign Finance Complaint No. 2022 – 07 – 44 – 215

Dear Foundation for Accountability and Civic Trust:

The Department of State received a response from Road to Michigan's Future to the complaint you filed against them alleging a violation of the Michigan Campaign Finance Act, 1976 P.A. 388, MCL 169.201 *et seq.* A copy of the response is provided as an enclosure with this letter.

You may file a rebuttal statement after reviewing the enclosed response. If you elect to file a rebuttal statement, you are required to do so within 10 business days of the date of this letter. The rebuttal statement may be emailed to BOERegulatory@michigan.gov or mailed to the Department of State, Bureau of Elections, Richard H. Austin Building, 1st Floor, 430 West Allegan Street, Lansing, Michigan 48918.

Sincerely,

Regulatory Section
Bureau of Elections
Michigan Department of State



FACT

FOUNDATION FOR
ACCOUNTABILITY
AND CIVIC TRUST

October 18, 2022

Regulatory Section
Bureau of Elections
Michigan Department of State
Richard H. Austin Building, 1st Floor
430 W. Allegan
Lansing, Michigan 48918

Email: BOERegulatory@michigan.gov

Re: *Foundation for Accountability and Civic Trust v. Road to Michigan's Future*, Campaign
Finance Complaint No. 2022 – 07 – 44 – 215

To the Michigan Department of State:

The Foundation for Accountability and Civic Trust (FACT) submits this rebuttal in the case identified above. In its response, Road to Michigan's Future first raised "background information" about the Foundation for Accountability and Civic Trust. We object to this mischaracterization of the party filing the complaint as irrelevant and inaccurate. It is however telling that they did this—as the law simply does not support their case. Road to Michigan's Future has made an implied request that the Department judge this case on a political basis rather than a factual one. The law applies equally to all, and the reason this complaint was filed is because the facts clearly demonstrate Road to Michigan's Future should have registered as a ballot question committee.

The entirety of the Road to Michigan's Future response shows it hopes the Department will make a political decision, not a legal one. This is evident by its response that ignores all case law with the exception of a single case, and cherry picking facts from that case to argue it is not completely analogous. Case law demonstrates that to determine whether an organization has "solicited or received contributions for the purpose of making an expenditure to a ballot question committee" and thus has become a committee itself, that the Department examines facts showing the two organizations are not independent of one another. For instance, some specific facts the Department considered when it found a corporation has become a committee are: (1) the corporation and ballot question committee formed within a short period of time, (2) a same

individual was involved in both organizations; (3) the percentage of the ballot question committee's total funding from the corporation; (4) the flow of money between the corporation and ballot question committee indicated a relationship between the groups; and (5) substantial fundraising while supporting a committee.¹

When determining whether Road to Michigan's Future must register as a committee all the relevant facts must be examined, not just the four that Road to Michigan's Future lazily identified and inaccurately argue distinguish it from a single prior case. As set forth in the complaint, numerous facts demonstrate Road to Michigan's Future should have registered, some of which are briefly summarized below:

1. Both organizations were newly formed in 2020 and formed within months of one another.
2. Approximately six and one-half months after it formed on January 15, 2020, and prior to which it **had no assets**, Road to Michigan's Future made a \$750,000 contribution to Keep Michigan Safe in July 2020.
3. Road to Michigan's Future was Keep Michigan Safe's first contributor within a month of Keep Michigan Safe's formation.
4. Road to Michigan's Future was Keep Michigan Safe's primary source of funding throughout the next year and three months—**Road to Michigan's Future's contributions comprised 86.4% of Keep Michigan Safe's funding.**
5. Once Keep Michigan Safe's cash on hand was low, Road to Michigan's Future replenished Keep Michigan Safe's funds by making another \$115,000 contribution in October 2021, which Keep Michigan Safe paid out to its vendors almost in its entirety over the next six weeks.
6. The organizations had a common contractor—Heather Ricketts—who was listed as the contact for Road to Michigan's Future on its own tax returns and a contractor of Keep Michigan Safe.

Another fact showing the common relationships and interest between the two organizations ironically became evident in Road to Michigan's Future's response: Clark Hill

¹ See e.g., *Turnaround Detroit v. Detroit Forward*, MI Campaign Finance Complaint (decision filed April 9, 2014) (considering that the corporation contributed over 33% of the ballot question committee's total funding during the entire Detroit mayoral election cycle); *LaBrant v. Michigan Citizens for Fiscal Responsibility, Michigan! My Michigan!*, MI Campaign Finance Complaint filed May, 25, 2021 (decision filed Oct. 27, 2021) (explaining evidence the corporation raised significant funds, contributed the funds to a ballot question committee within the calendar year the funds were raised, and the ballot question committee immediately paid vendors supported a finding the corporation was a committee and must register with the Department); *LaBrant v. Unlock Michigan*, MI Campaign Finance Complaint filed Sept. 17, 2020 (decision filed April 9, 2021) (explaining evidence the corporation and ballot question committee are controlled by the same individuals and functioning as the same entity support a finding the corporation is a committee and must register with the Department).

received significant payments from Keep Michigan Safe (as shown in the table below). Clark Hill also submitted the response in this case on behalf of Road to Michigan’s Future. The dual representation of both parties further shows that not only do they not have any conflicts, but their interests are aligned and common.

Date	Vendor	Amount Paid by Keep Michigan Safe
September 23, 2020	Clark Hill	\$32,554.50
November 18, 2021	Clark Hill	\$40,000.00
December 29, 2021	Clark Hill	\$28,552.70

In its response, Road to Michigan’s Future raises four facts that it argues distinguish it from the prior case of *LaBrant v. Michigan Citizens for Fiscal Responsibility (MCFR) and Michigan! My Michigan!* (MMM), MI Campaign Finance Complaint filed May, 25, 2021 (decision filed Oct. 27, 2021).

First, Road to Michigan’s Future states it gave donations to other organizations and compared this to MCFR and MMM, which did not introduce any evidence they supported other organizations. This was not raised or argued in the MCFR/MMM case because it is completely irrelevant. The issue is the relationship between Road to Michigan’s Future and Keep Michigan Safe. All the facts identified above show the “entities were not independent of each other” and Road to Michigan’s Future fundraised during the time period it supported Keep Michigan Safe.² Like the MCFR/MMM case, Road to Michigan’s Future fundraised over a short period of six months and made “substantial” contributions to the extent it was Keep Michigan Safe’s primary funder. These contributions made during 2020 far exceeded the assets controlled by Road to Michigan’s Future at the beginning of 2020 (which were zero). Moreover, the timing of their contributions, which were just after Keep Michigan Safe formed and once again when they needed cash, show the entities “coordinated to some extent.”³ Whether or not Road to Michigan’s Future supported other organizations does not change these facts, nor is it relevant to whether it fundraised with the purpose of supporting Keep Michigan Safe as the facts demonstrate—obviously both things could simultaneously be true.

² *LaBrant v. Michigan Citizens for Fiscal Responsibility, Michigan! My Michigan!*, MI Campaign Finance Complaint filed May, 25, 2021 (decision filed Oct. 27, 2021).

³ *Id.*

Second, Road to Michigan's Future states it raised sufficient funds between January and July 3, 2020 to make the full contribution to Keep Michigan Safe. However, this does not mean that Road to Michigan's Future didn't fundraise with the purpose of funding Keep Michigan Safe. **Of course** Road to Michigan's Future had to fundraise before it could make the contribution. If anything, this demonstrates that Road to Michigan's Future was fundraising with the purpose of making this substantial contribution to Keep Michigan Safe upon its formation. As compared to the MCFR/MMM case, Road to Michigan's Future had to raise **more** money to make its initial contribution than either MCFR and MMM did. Additionally, the evidence shows Road to Michigan's Future continued fundraising after July 3, 2020, knowing it was Keep Michigan Safe's primary funder and that it intended to continue supporting them. As in the MCFR/MMM case, Road to Michigan's Future was fundraising while supporting Keep Michigan Safe.

Third, Road to Michigan's Future states "there is no pattern of contributions and expenditures suggesting that RTMF acted as a conduit to contributions and expenditures by Keep Michigan Safe." The facts demonstrate exactly the opposite. Road to Michigan's Future provided **86% of Keep Michigan Safe's funds** and the timing of its contributions of those funds show the two organizations acted in concert. Road to Michigan's future was the first and primary source of funding and when that ran out it made a second large contribution, which Keep Michigan Safe paid out to its vendors over the next six weeks. This, as well as the other facts identified above, show the two organizations are not independent of one another. Moreover, there is no requirement that Road to Michigan's Future acted as a "conduit", but just that it was "fundraising for the purpose of supporting a ballot question committee."⁴

Fourth, Road to Michigan's Future states "Keep Michigan Safe, unlike Unlock Michigan, maintained a robust independent fundraising campaign." To show it had "robust independent fundraising," Road to Michigan's Future compares Keep Michigan Safe's independent fundraising to that of the ballot question committee in the MCFR/MMM case.⁵ In order to accurately compare the independent fundraising, the percentage of contributions from the organization and from independent sources obviously must be examined. It is quite remarkable that Road to Michigan's Future would make this comparison because this case is identical to MCFR/MMM—**both Road to Michigan's Future and MCFR/MMM contributed 86% of the ballot question committee's total funding**. This means that the independent fundraising was identical. In the separate prior case *Turnaround Detroit v. Detroit Forward*, an organization

⁴ *LaBrant v. Michigan Citizens for Fiscal Responsibility, Michigan! My Michigan!*, MI Campaign Finance Complaint filed May, 25, 2021 (decision filed Oct. 27, 2021).

⁵ *Id.*

contributed just 33% of a committee’s funding and the Department found this fact supported its decision that the organization was required to register as a committee.⁶

Additionally, as evidence of its “robust” independent fundraising campaign, Road to Michigan’s Future attached an incredibly paltry four fundraising emails that Keep Michigan Safe sent to an undisclosed number of people on August 8, August 29, September 14, and September 24, 2020. If anything, there is a glaring lack of evidence that Keep Michigan Safe even bothered fundraising before August 8, 2020, likely because Road to Michigan’s Future was its primary funder and it knew Road to Michigan’s Future was also supporting its future financial needs. In fact, that is exactly what happened—when Keep Michigan Safe ran out of funds in October 2021, Road to Michigan’s Future made another large donation of \$115,000, which Keep Michigan Safe promptly used in its near entirety to pay its vendors over the next six weeks. As if it wasn’t clear already, the fact that Road to Michigan’s Future was able to produce four insignificant emails sent years ago by Keep Michigan Safe shows just how closely tied they are to one another—although perhaps it shouldn’t be surprising given that literally the same person (Heather Ricketts) was involved in each entity.

Road to Michigan’s Future did not introduce any facts that refuted the evidence, nor did they address multiple facts laid out in the complaint such as the person in common or the 86% funding level. In the past, the Department found that even if it was *possible* an entity raised funds independent of its support for a committee, that possibility was overcome with specific facts. For instance, when the organization and committee were shown to be not independent of each other and the organization fundraised while it supported the committee.⁷ This is the exact factual situation presented here. While Road to Michigan’s Future’s response proves they cannot argue the law and are asking the Department to make a political decision, we are asking for the Department to make a fair and impartial decision. We request the Department examine the facts in this case, apply its prior case precedents, and find Road to Michigan’s Future’s activity demonstrates it should have registered as a committee and filed the required reports.⁸

Respectfully submitted,
/s/Kendra Arnold
Executive Director
Foundation For Accountability and Civic Trust
1717 K Street NW, Suite 900, Washington, D.C., 20006

⁶ *Turnaround Detroit v. Detroit Forward*, MI Campaign Finance Complaint (decision filed April 9, 2014).

⁷ *LaBrant v. Michigan Citizens for Fiscal Responsibility, Michigan! My Michigan!*, MI Campaign Finance Complaint filed May, 25, 2021 (decision filed Oct. 27, 2021).

⁸ *Id.*



STATE OF MICHIGAN
JOCELYN BENSON, SECRETARY OF STATE
DEPARTMENT OF STATE
LANSING

December 16, 2022

Christopher M. Trebilcock
Clark Hill
Attorney for Road to Michigan's Future
500 Woodward Ave., Suite 3500
Detroit, MI 48226

Re: *The Foundation for Accountability and Civic Trust v. Road to Michigan's Future*
Campaign Finance Complaint No. 2022 – 07 – 44 – 215

Dear Mr. Trebilcock:

The Department of State (Department) has finished its initial investigation of the campaign finance complaint filed against your client, Road to Michigan's Future (RTMF), by The Foundation for Accountability and Civic Trust (FACT) alleging violations of the Michigan Campaign Finance Act (MCFA or Act). This letter concerns the current disposition of the complaint against your clients.

The complaint alleged that RTMF solicited or received donations for the purpose of making expenditures to Keep Michigan Safe. Keep Michigan Safe is a ballot question committee regulated by the MCFA. In support of these claims, FACT stated that RTMF contributed \$865,000 in funding to Keep Michigan Safe from July 2020 to October 2021. The complaint also alleges that the RTMF and Keep Michigan Safe formed as organizations with months of one another. FACT alleges that approximately six months after forming, RTMF made a \$750,000 contribution to Keep Michigan Safe. Finally, the complaint alleged that RTMF's contributions comprised 86.4% of Keep Michigan Safe's funding.

You responded to the complaint on October 11, 2022. In your response you indicated that as shown in RTMF's IRS Form 990, RTMF contributed \$750,000 to Keep Michigan Safe, while in the same year also donating \$2,218,000 to organizations other than Keep Michigan Safe. Approximately two-thirds of RTMF's grants during 2020 went to organizations other than Keep Michigan Safe. You also indicated that RTMF had sufficient funds prior to Keep Michigan Safe's formation on July 3, 2020 to make the full amount of the contribution without any additional fundraising. You stated that as of July 1, 2020, RTMF had received approximately \$2.5 million dollars in contributions, had spent approximately \$1.7 million in grants, and maintained more than an \$800,000 balance. The response also indicated that there was no pattern of contributions and expenditures suggesting that RTMF acted as a conduit to contributions and expenditures by Keep Michigan Safe. Finally, you argued that FACT's complaint failed to allege

any facts showing that RTMF was soliciting or receiving contributions for the express purpose of making expenditures to Keep Michigan Safe.

On October 18, 2022, FACT provided a rebuttal. In their rebuttal, FACT indicated that case law demonstrates that to determine whether an organization has solicited or received contributions for the purpose of making an expenditure to a ballot question committee and thus has become a committee itself, that the Department must examine facts showing the two organizations are not independent of one another. FACT went on to indicate that there are five factors that must be considered including the formation dates of the two organizations, the individuals involved in both organizations, the percentage of the ballot question committee's total funding received from the organization, the flow of money between the two organizations, and the substantial fundraising needed while supporting a committee.

In Michigan, a committee is an organization which "receives contributions or makes expenditures for the purpose of influencing or attempting to influence the action of the voters for or against the nomination or election of a candidate, the qualification, passage, or defeat of a ballot question, or the qualification of a new political party, if contributions received total \$500.00 or more in a calendar year or expenditures made total \$500.00 or more in a calendar year." MCL 169.203(4). The MCFA requires committees to file certain campaign statements detailing contributions and expenditures. See, e.g., MCL 169.234. Failure to file these required statements can result in civil and criminal penalties. *Id.* An organization making an expenditure to a ballot question committee is not a committee under the MCFA and is not subject to the reporting requirements of the MCFA, however, unless that organization "solicits or receives contributions for the purpose of making an expenditure to that ballot question committee." MCL 169.203(4). Upon meeting the definition of committee, the organization is obligated to file a statement of organization with the appropriate filing official within 10 days of the committee's formation, MCL 169.224, and is also required to file various campaign statements detailing the organization's contributions and expenditures.

As the Department stated in a 2020 campaign finance complaint determination,¹ "it is not a violation of the Act for a group to raise funds in its normal course of conduct and make contributions to a ballot question committee or to coordinate with that ballot question committee. It is, however, a violation of the Act for an organization to raise money on behalf of the ballot question committee in order to shield the organization's donors from the reporting requirements of the Act." The complaint alleges that your groups' activities amount to such a violation.

The Department has reviewed this matter and finds that there is insufficient evidence to support a finding that there "may be reason to believe" that RTMF violated the MCFA. MCL 169.215. The evidence has not established that RTMF took actions that qualify the organization as a ballot question committee under the MCFA. Specifically, the Department finds that RTMF had sufficient funds prior to Keep Michigan Safe's formation to more than finance the contribution

¹ *LaBrant v. Michigan Citizens for Fiscal Responsibility, Michigan! My Michigan!*, MI Campaign Finance Complaint filed May, 25, 2021 (decision filed Oct. 27, 2021)

made in July 2020, and that it was entirely possible for RTMF to raise those funds independently of their support for Keep Michigan Safe. Further, the Department finds that there was no clear pattern of contributions and expenditures demonstrating a level of coordination between RTMF and Keep Michigan Safe to indicate that the entities were not independent of each other. Finally, the Department finds that there is insufficient evidence to establish that RTMF was soliciting or receiving contributions for the express purpose of making expenditures to Keep Michigan Safe, because RTMF also made significant contributions to several other organizations during the same time frame.

As such, the Department dismisses the allegations contained in the complaint and will take no further action.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jenny McInerney".

Jenny McInerney, Regulatory Attorney
Bureau of Elections
Michigan Department of State

c: The Foundation for Accountability and Civic Trust