



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

April 14, 2025

Representative Jay DeBoyer  
Representative Rachelle Smit  
Michigan House of Representatives  
State Capitol  
P.O. Box 30014  
Lansing, Michigan 48909-7514

Dear Representatives DeBoyer and Smit:

Thank you for your follow up letter dated April 4, 2025, and for a response timeframe of ten (10) calendar days. I am writing in response to this most recent letter.

**1. The current full, complete and unredacted training materials used to train Michigan clerks and their staffs on Michigan elections, including but not limited to the materials found in the e-learning portal and the materials comprising the materials requested in requests 11-12 of Rep. Smit's February 6, 2025, records request. For materials found in the e-learning portal, for simplicity, we would accept read access login credentials to the portal.**

**RESPONSE:** As noted in our March 7, 2025, response to Rep. Smit and our March 19, 2025, response to Chair DeBoyer, MDOS remains committed to the safe and secure administration of elections for the citizens of Michigan. We are resolute in our duty to security and integrity of our collective election systems. Again, as noted in our prior responses, MDOS maintains a secure portal for election clerks which contains sensitive training materials regarding the cyber security and physical security of election systems and election machines. This limited access is critical to ensure the ongoing integrity of our election systems and thereby the integrity of our elections; therefore, read access login credentials will not be provided.

In an effort to assist the Election Integrity Committee in its previously stated goal of reviewing election documents to identify areas of improvement for election administration, the Department will conduct an individual review of each of the items included on the e-learning portal to prevent disclosure of protected information which, if released, may jeopardize the security and integrity of Michigan elections. In our March 7, 2025 response, MDOS offered to assist the Committees by asking the Committees to identify which specific materials they were most interested in reviewing, so that these materials could be prioritized for production. Because we did not receive any response to this offer of assistance, MDOS will provide the materials, following a security review, on a rolling basis. MDOS is happy to provide all appropriate materials to the Committees in a transparent matter, but cannot divert its limited resources from the critical missions of

supporting election officials and voters and ensuring the security, safety, and integrity of Michigan elections in response to inexact oversight requests being weaponized against state agencies and in turn, the Michiganders they serve.

An initial production of materials will be available on April 30, 2025, with subsequent productions to follow. As we expect the materials to be too large to provide via email, we will need to know your preferred method of delivery, such as file transfer service or flash drive.

**2. Identify all documents withheld from Reps. Smit/DeBoyer and/or the Committees relating to each document request made between November 1, 2024 and the present.**

**RESPONSE:** As part of the Department's March 7, 2025 response to Rep. Smit, a list of training materials available to clerks through the eLearning Center was provided. This list identifies the only materials the Department has withheld from production to ensure the cyber security and physical security of election systems and election machines. A copy of the list from March 7, 2025, has been provided for your convenience.

**3. Requests 8-10 of the materials requested by Rep. Smit in her request of February 6, 2025.**

As part of the Department's March 7, 2025, response, the Department provided Rep. Smit with the materials requested in Requests 8-10 of her February 6, 2025, letter. The requests and responses were as follows:

*Request 8:* (Time period 2016 to present) All opinions (operative during the time period) of the Secretary of State interpreting Michigan elections law and /or regulations and/or administrative rules (this includes but is not limited to letters /guidance issued to clerks, etc.).

*Response:* Any opinions of the Secretary of State interpreting Michigan's laws related to elections, campaign finance, and lobby registration are made available online for interested parties to review. Specifically, they can be found at the following websites:

Michigan Campaign Finance Act: [Michigan Campaign Finance Act Complaints](#)

Michigan Lobby Registration Act: [Michigan Lobby Act Rulings](#)

*Request 9:* (Time period 2016 to present) All opinions of the Director of Elections Jonathan Brater (or other Director during the period) interpreting Michigan elections law and /or regulations and/or administrative rules (this includes but is not limited to letters and/or guidance issued to clerks).

*Response:* Please see attached copies of any opinions issued by the Director of Elections from 2019 to the present.

*Request 10:* (Time period 2016 to present) All administrative rules and/or regulations created by the Secretary of State, Director Brater, and/or any rulemaker and/or rulemaking body within MDOS pertaining to Michigan elections (this includes but is not limited to letters/guidance issued to clerks).

*Response:* The Department of Licensing and Regulatory Affairs (LARA), maintains Michigan's Administrative Rulemaking System (ARS), the statewide online database for administrative rules. The database, which contains nine sets of administrative rules related to elections and campaign finance, is directly linked on the MDOS Elections homepage. The link to the LARA ARS page is here for your convenience. ([ARS Public - MI Admin Code for State - Elections & Campaign Finance](#)). The applicable rulesets include the following:

- Board of State Canvasser Procedures
- Campaign Financing
- Casino Interest Registration
- Conduct of Election Recounts
- Disqualification from Ballot Based Upon Contents of Affidavit of Identity
- Electronic Voting Systems
- Lobbyist Registration and Reporting
- Online Absent Voter Ballot Application
- Signature Matching for Absent Voter Ballot Applications and Absent Voter Ballot Envelopes

Sincerely,

Khyla D. Craine  
Chief Legal Director  
Michigan Department of State

