

STATE OF MICHIGAN
IN THE SUPREME COURT

LEAGUE OF WOMEN VOTERS OF
MICHIGAN, MICHIGANDERS FOR FAIR
AND TRANSPARENT ELECTIONS,
HENRY MAYERS, VALERIYA
EPSHTEYN, and BARRY RUBIN,
Plaintiffs-Appellees,

and

SENATE and HOUSE OF REPRESENTATIVES,
Intervenors-Appellants,

v

SECRETARY OF STATE,
Defendant-Appellee.

Supreme Court No: 160907
Court of Appeals No: 350938
Court of Claims No: 19-000084-MM

SENATE and HOUSE OF REPRESENTATIVES,
Plaintiffs-Appellants,

v

SECRETARY OF STATE,
Defendant-Appellee.

Supreme Court No: 160908
Court of Appeals No: 351073
Court of Claims No: 19-000092-MZ

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THIS APPEAL INVOLVES A
RULING THAT SEVERAL
PROVISIONS OF THE
MICHIGAN ELECTION LAW
ARE INVALID

MICHIGAN CHAMBER OF COMMERCE'S
AMICUS CURIAE BRIEF

TABLE OF CONTENTS

	<u>Page</u>
TABLE OF AUTHORITIES	ii
STATEMENT OF QUESTIONS PRESENTED	iv
STATEMENT OF INTEREST	1
CONSTITUTIONAL PROVISIONS INVOLVED.....	2
INTRODUCTION.....	3
STATEMENT OF FACTS	6
ARGUMENT	8
I. The Michigan Senate and Michigan House have standing to ask the courts to defend the validity of a Michigan election law when both the Michigan Secretary of State (the Defendant in these proceedings) and the Michigan Attorney General decline to defend the Michigan election law	8
II. This Court lacks jurisdiction over these proceedings unless the Michigan Senate and Michigan House have standing to defend the validity of the Michigan election law	10
CONCLUSION AND REQUESTED RELIEF	14

TABLE OF AUTHORITIES

	Page(s)
Cases	
<i>American Wood-Paper Co v Heft</i> , 75 US 333 (1869)	12
<i>Andrews v Branigin</i> , 21 Mich App 568; 175 NW2d 839 (1970)	9, 10
<i>Baldwin v Board of Supervisors</i> , 189 Mich 372; 155 NW 367 (1915)	9
<i>Citizens for Common Sense in Gov't v Attorney General</i> , 243 Mich App 43; 620 NW2d 546 (2000)	11
<i>Common Council v Rush</i> , 82 Mich 532; 46 NW 951 (1890)	10
<i>Deleeuw v State Bd. Of Convassers</i> , 263 Mich App 497; 688 NW2d 847 (2004)	9
<i>Fieger v Comm'r of Ins.</i> , 174 Mich App 467; 437 NW2d 271 (1988)	10, 11
<i>Fox v Univ of Michigan Bd of Regents</i> , 375 Mich 238; 134 NW2d 146 (1965)	10
<i>Genesis Center, P.L.C. v Financial and Ins. Services Com'r</i> , 246 Mich App 531; 633 NW2d 834 (2001)	11
<i>Hillsdale Co Senior Servs, Inc v Hillsdale Co</i> , 494 Mich 46; 832 NW2d 728 (2013)	10
<i>Lansing Schools Ed Ass'n v Lansing Bd of Education</i> , 487 Mich 349; 792 NW2d 686 (2010)	8
<i>League of Women Voters of Michigan v Secretary of State</i> , ___ Mich App ___, ___; ___ NW2d ___ (2020) (Docket Nos 350938, 351073) (January 27, 2020)	passim
<i>People v Lown</i> , 488 Mich 242; 794 NW2d 9 (2011)	10

<i>Shavers v Attorney General</i> , 402 Mich 554; 267 NW2d 72 (1978)	11
<i>South Spring Hill Gold Mining Co. v Amador Medean Gold Mining Company</i> , 145 US 300 (1892)	12
<i>Sutherland v Governor</i> , 29 Mich 320 (1874)	4
<i>Straus v Governor</i> , 459 Mich 526; 592 NW2d 53 (1999)	10
<i>Thompson v Secretary of State</i> , 192 Mich 512; 159 NW 65 (1916)	9
<i>United States v Windsor</i> , 570 US 744 (2013)	5, 13
<i>Yee v Schiawassee Co Bd of Comm'rs</i> , 251 Mich App 379; 651 NW2d 756 (2002)	10
 Constitutional Provisions	
Const 1963, art 2, § 4	9
Const 1963, art 3, § 2	3
Const 1963, art 4, § 1	3
Const 1963, art 6, § 1	3
 Other	
Op Atty Gen 1977, No 5194, p. 137 (May 24, 1977)	9

STATEMENT OF QUESTIONS PRESENTED

1. Whether the Michigan Senate and Michigan House have standing to ask the courts to defend the validity of a Michigan election law when both the Michigan Secretary of State (the Defendant in these proceedings) and the Michigan Attorney General decline to defend the Michigan election law?

Amicus Michigan Chamber of Commerce answers: “yes”

2. Whether the courts lack jurisdiction over these proceedings unless the Michigan Senate and Michigan House have standing to ask the courts to defend the validity of the Michigan election law?

Amicus Michigan Chamber of Commerce answers: “yes”

STATEMENT OF INTEREST

Amicus Michigan Chamber of Commerce (the “Chamber”) is the leading voice of business in Michigan. The Chamber advocates for job providers in the legislature and legal forums and represents over 5,000 employers, trade associations, and local chambers of commerce of all sizes and types in every county of the state. The Chamber’s member firms employ over 1 million Michiganders. The Chamber and its members have a direct interest in this matter since the Court’s decision will impact the terms and conditions under which its member employers will be required to operate. The Chamber also has an interest in maintaining the integrity of the legislative process.¹

¹ This brief was not authorized by counsel for a party to this case in whole or in part, nor did such counsel or a party make a monetary contribution intended to fund the preparation or submission of this brief. Other than *amicus curiae* and their counsel, no person made a monetary contribution to assist in preparation of this brief.

CONSTITUTIONAL PROVISIONS INVOLVED

Article 2, § 4 of Michigan's Constitution states in relevant part:

“(2) Except as otherwise provided in this constitution or in the constitution or laws of the United States the legislature shall enact laws to regulate the time, place and manner of all nominations and elections, to preserve the purity of elections, to preserve the secrecy of the ballot, to guard against abuses of the elective franchise, and to provide for a system of voter registration and absentee voting. No law shall be enacted which permits a candidate in any partisan primary or partisan election to have a ballot designation except when required for identification of candidates for the same office who have the same or similar surnames.”

Article 3, § 2 of Michigan's Constitution states:

“The powers of government are divided into three branches: legislative, executive and judicial. No person exercising powers of one branch shall exercise powers properly belonging to another branch except as expressly provided in this constitution.”

INTRODUCTION

Unless this Court takes appropriate action, the Executive Branch, with the assistance of like-minded plaintiffs, will have been allowed to use the Judiciary through these cases to effectuate an unconstitutional repeal of legislation.

Consequently, the Chamber asks this Court to recognize the Legislature's standing in these cases to defend a Michigan election law. Significantly, no party in these proceedings (other than the Legislature) is defending 2018 PA 608. As recognized by Judge Boonstra in the Court of Appeals below:

“Yet, apart from the Legislature, there would appear to be no one to argue in opposition to the position taken jointly by plaintiffs (in Docket 350938), the Secretary (defendant in both dockets) and the Attorney General (who is representing the Secretary in both dockets, premised on the Attorney General's own legal opinion), particularly within the attenuated time frame within which these issues must be decided in advance of the procedural run-up to 2020 elections.” (footnote omitted)

1/27/20 Slip Op, p 4 (Boonstra, J, dissenting)

Therefore, unless the Legislature is granted standing in these cases to defend a Michigan election law, there is no actual controversy among the remaining parties, and this Court thereby lacks jurisdiction over these proceedings.

Article III, Section 2 of the Michigan Constitution provides that:

“The powers of government are divided into three branches: legislative, executive, and judicial. No person exercising powers of one branch shall exercise powers properly belonging to another branch except as expressly provided in this constitution.”

The Michigan Constitution vests the legislative power of the State of Michigan in the Legislature. Const 1963, art 4, § 1. In Michigan, Const 1963, art 6, § 1 vests the state "judicial

power" in the courts. Const 1963, art 3, § 2 expressly directs that the powers of the legislature, the executive, and the judiciary be separate. Concern with maintaining the separation of powers has caused this Court over the years to be vigilant in preventing the judiciary from usurping the powers of the political branches. Early on, the great constitutional scholar Justice Thomas M. Cooley discussed the concept of separation of powers in the context of declining to issue a mandamus against the Governor in *Sutherland v Governor*, 29 Mich 320, 324-325 (1874):

"Our government is one whose powers have been carefully apportioned between three distinct departments, which emanate alike from the people, have their powers alike limited and defined by the constitution, are of equal dignity, and within their respective spheres of action equally independent. One makes the laws, another applies the laws in contested cases, while the third must see that the laws are executed. This division is accepted as a necessity in all free governments, and the very apportionment of power to one department is understood to be a prohibition of its exercise by either of the others. The executive is forbidden to exercise judicial power by the same implication which forbids the courts to take upon themselves his duties."

Absent an actual controversy, the result would be to have the judicial branch of government—the least politically accountable of the branches—deciding public policy, not in response to a real dispute in which a plaintiff is adverse to a defendant, but in response to a lawsuit from a citizen who had simply not prevailed in the representative processes of government. To allow the judiciary to carry out its responsibilities in this manner is to misperceive the "judicial power," and to establish the judicial branch as a forum for giving parties who were unsuccessful in the legislative and executive processes simply another chance to prevail. To allow this authority in the judiciary would also be to establish the judicial branch as first among equals, being permitted to monitor and supervise the other branches, and effectively possessing a generalized commission to evaluate and second-guess the wisdom of their policies.

The majority United States Supreme Court opinion in *United States v. Windsor*, 570 US 744 (2013), in which the United States Supreme Court invalidated § 3 of the Defense of Marriage Act (“DOMA”), is instructive. The plaintiff in *Windsor* sued to obtain a tax refund that the Internal Revenue Service (“IRS”) had denied her because § 3 prevented the United States Supreme Court from recognizing her same-sex marriage. 570 US at 753. Although the Obama Administration required federal agencies to enforce § 3’s definition of marriage as a union between one man and one woman, it prohibited DOJ from defending the provision’s constitutionality in court. 570 US at 753-754. The United States Supreme Court commented that the DOJ’s failure to contest the plaintiff’s constitutional arguments raised “prudential” concerns because the litigants’ agreement on the main issue in the case could lead to a “friendly, non-adversary, proceeding.” 570 US at 759-760. The United States Supreme Court held that those concerns were overcome, however, because the U.S. House of Representative’s Bipartisan Legal Advisory Group had intervened to defend § 3’s constitutionality. 570 US at 761.

Accordingly, unless the Legislature is granted standing in these cases to defend a Michigan election law, there is no actual controversy among the remaining parties. Absent an actual controversy, a court simply lacks the judicial power granted to it under the Michigan Constitution.

STATEMENT OF FACTS

Although the Chamber generally agrees with the Facts and Procedural History set forth in the Court of Appeals Opinion below (1/27/20 Slip Op, pp 2-6), a brief review of certain facts is instructive:

1. On December 28, 2018, 2018 PA 608 was signed into law. 2018 PA 608 amended the Michigan election law.
2. On May 22, 2019, the Michigan Attorney General issued Attorney General Opinion No. 7310. In the opinion, the Attorney General concluded that the following sections of 2018 PA 608 were unconstitutional:
 - A. The portions of MCL 168.471, 168.477, and 168.483(4) involving the 15% geographic requirement;
 - B. MCL 168.482(7), 168.482c regarding the check-box requirement; and
 - C. MCL 168.482a(1), (2) involving the pre-circulation affidavit.

In the opinion, the Attorney General also concluded that the following section of 2018 PA 608 was constitutional:

- D. MCL 168.482a(1) regarding signature-invalidation requirements
3. On May 23, 2019 (the day after the Michigan Attorney General issued Opinion No. 7310), plaintiffs, League of Women Voters of Michigan, Michiganders for Fair and Transparent Elections, Henry Mayers, Valeriya Epshteyn, and Barry Rubin, (collectively, "Plaintiffs") filed a complaint in the Court of Claims against the Michigan Secretary of

State for declaratory and injunctive relief. In their complaint, the Plaintiffs agreed with the Michigan Attorney General except for MCL 168.482a(1) regarding signature-invalidation requirements. Therefore, even when these proceedings started, there was little disagreement among the parties.

4. On June 5, 2019, the Michigan Senate and Michigan House of Representatives (the “Legislature”) also filed a complaint in the Court of Claims for declaratory and injunctive relief against the Michigan Secretary of State. The Legislature challenged the May 22, 2019 opinion of the Michigan Attorney General finding certain provisions of 2018 PA 608 unconstitutional, and sought declarations that 2018 PA 608 is constitutional and a valid exercise of the Legislature's authority, and that the law must be implemented and enforced by the Michigan Secretary of State.
5. On September 27, 2019, the Court of Claims concluded that the following sections of 2018 PA 608 were unconstitutional:
 - A. The portions of MCL 168.471, 168.477, and 168.483(4) involving the 15% geographic requirement; and
 - B. MCL 168.482(7), 168.482c regarding the check-box requirement.

In this opinion, the Court of Claims also concluded that the following sections of 2018 PA 608 were constitutional:

- C. MCL 168.482a(1), (2) involving the pre-circulation affidavit; and
- D. MCL 168.482a(1) regarding signature-invalidation requirements

6. On appeal to the Michigan Court of Appeals, the Plaintiffs, the Defendant Michigan Secretary of State, and the Michigan Attorney General were in complete agreement as to their position with respect to the September 27, 2019 Court of Claims Opinion.
7. On January 27, 2020, the Michigan Court of Appeals agreed with the Plaintiffs, the Defendant Michigan Secretary of State, and the Michigan Attorney General, holding that certain sections of 2018 PA 608 are unconstitutional.
8. At all times relevant to these proceedings, only the Legislature has defended 2018 PA 608; therefore, only the Legislature filed for leave to appeal with this Court.

ARGUMENT

I. THE MICHIGAN SENATE AND MICHIGAN HOUSE HAVE STANDING TO ASK THE COURTS TO DEFEND THE VALIDITY OF A MICHIGAN ELECTION LAW WHEN BOTH THE MICHIGAN SECRETARY OF STATE (THE DEFENDANT IN THESE PROCEEDINGS) AND THE MICHIGAN ATTORNEY GENERAL DECLINE TO DEFEND THE MICHIGAN ELECTION LAW

Rather than repeat arguments already presented to this Court on the issue of standing, the Chamber hereby adopts the analysis previously offered by both the Legislature to this Court and Judge Boonstra in his dissent in the Court of Appeals below. 1/27/20 Slip Op, pp 2-4 (Boonstra, J, dissenting).

On the question of standing, it appears that there is general agreement that the Michigan Supreme Court articulated the requirements to establish standing in *Lansing Schools Ed Ass'n v Lansing Bd of Education*, 487 Mich 349; 792 NW2d 686 (2010). In that case, this Court stated:

“In summary, standing historically developed in Michigan as a limited, prudential doctrine that was intended to" ensure sincere and vigorous advocacy" by litigants. If a party had a cause of action under law, then standing was not an issue. But where a cause of action was not provided at law, the Court, in its discretion, would consider whether a litigant had standing based on a special injury or right or substantial interest that would be detrimentally affected in a manner different from the citizenry at large, or because, in the context of a statutory scheme, the Legislature had intended to confer standing on the litigant.” (emphasis supplied) 487 Mich at 359.

The underlined portion of this Court’s opinion above does not require a “specific cause of action” or an “express” grant of standing in a statute, as incorrectly noted by the Court of Appeals below. See 1/27/20 Slip Op, p 7, n 9. Rather, this Court broadened standing to the “context of a statutory scheme”.

Under well-established Michigan precedent, the “context” of the Michigan election law confers standing on ordinary citizens because “election cases are special”. According to the Michigan Court of Appeals in *Deleeuw v. State Bd. of Canvassers*, 263 Mich App 497, 505-506; 688 NW2d 847 (2004):

“We recognize that a court will not ordinarily allow the public to use the court's power to interfere with the executive branch's enforcement of laws because this disturbs our constitutionally framed separation of powers..... Normally, courts require citizens to resort to the election process to vent any frustration..... Election cases are special, however, because without the process of elections, citizens lack their ordinary recourse. For this reason we have found that ordinary citizens have standing to enforce the law in election cases.” (citing *Helmkamp v. Livonia City Council*, 160 Mich App 442, 445, 408 NW2d 470 (1987)).

See also, *Baldwin v. Board of Supervisors*, 189 Mich 372; 155 NW 367 (1915); *Thompson v. Secretary of State*, 192 Mich 512; 159 NW 65 (1916).

The Michigan Constitution empowers the Legislature with the duty to “regulate the time, place and manner of all nominations and elections, to preserve the purity of elections, to preserve the secrecy of the ballot, to guard against abuses of the elective franchise, and to provide for a system of voter registration and absentee voting.” Const 1963, art 2, § 4. Commenting on this constitutional provision, the Michigan Attorney General noted:

“Thus, pursuant to the preceding broad mandate, *Schell v Waterford Township*, 381 Mich 123, 128; 159 NW2d 833, 835 (1968), it is within the exclusive province of the legislature to laws providing for the registration of voters, and the time, place, and manner of conducting elections. *Andrews v Wayne County Clerk*, 21 Mich App 568, 572; 175 NW2d 839 (1970); 2 Official Record, Constitutional Convention 1961, p. 3366.” (emphasis supplied) Op Atty Gen 1977, No 5194, p. 137 (May 24, 1977).

As recognized by the Michigan Court of Appeals in *Andrews v Branigin*, 21 Mich App 568, 572; 175 NW2d 839 (1970), the Legislature's exclusive role in the election process is a

time-honored principle dating back to at least the 1890 Michigan Supreme Court case of *Common Council v Rush*, 82 Mich 532; 46 NW 951 (1890):

"Under these broad provisions, it has been frequently held to be the exclusive province of the Legislature to enact laws providing for the registration of voters, and the time, place and manner of conducting elections."

Accordingly, if an "ordinary citizen" has standing to enforce or defend a Michigan election law, then the Legislature—which possesses an exclusive role in the election process—must certainly have standing to defend 2018 PA 608, particularly when no other party in these proceedings is defending this Michigan election law.

II. THIS COURT LACKS JURISDICTION OVER THESE PROCEEDINGS UNLESS THE MICHIGAN SENATE AND MICHIGAN HOUSE HAS STANDING TO DEFEND THE VALIDITY OF THE MICHIGAN ELECTION LAW

Defects in subject-matter jurisdiction cannot be waived and may be raised at any time. *Hillsdale Co Senior Servs, Inc v Hillsdale Co*, 494 Mich 46, 51 n 3; 832 NW2d 728 (2013). Because subject-matter jurisdiction "concerns the court's power to hear a case, it is not subject to waiver." *People v Lown*, 488 Mich 242, 268; 794 NW2d 9 (2011). In addition, a court must at all times be cognizant of its own jurisdiction and sua sponte question whether it has jurisdiction over a person or the subject-matter of an action. *Straus v Governor*, 459 Mich 526, 532; 592 NW2d 53 (1999); *Yee v Shiawassee Co Bd of Comm'rs*, 251 Mich App 379, 399; 651 NW2d 756 (2002). "When a court is without jurisdiction of the subject matter, any action with respect to such a cause, other than to dismiss it, is absolutely void." *Fox v Univ of Michigan Bd of Regents*, 375 Mich 238, 242; 134 NW2d 146 (1965). Where no actual controversy exists, the circuit court lacks subject-matter jurisdiction to enter a declaratory judgment. *Fieger v. Comm'r of Ins.*, 174

Mich App 467, 470; 437 NW2d 271 (1988), citing *Shavers v. Attorney General*, 402 Mich 554, 558, 267 NW2d 72 (1978). See, also *Citizens for Common Sense in Gov't v. Attorney General*, 243 Mich App 43, 56; 620 NW2d 546 (2000); *Genesis Center, P.L.C. v. Financial and Ins. Services Com'r*, 246 Mich App 531, 544; 633 NW2d 834 (2001). To demonstrate an actual controversy, a plaintiff must "plead and prove facts which indicate an adverse interest necessitating a sharpening of the issues raised." *Shavers v. Attorney General*, 402 Mich 554, 589; 267 NW2d 72 (1978); *Fieger v. Comm'r of Ins.*, 174 Mich App 467, 470-471; 437 NW2d 271 (1988).

In the present proceedings, there is no actual controversy between the Plaintiffs, the Defendant Michigan Secretary of State and the Michigan Attorney General. When the initial complaint (in Court of Claims No. 19-000084-MM) was filed by the Plaintiffs on the next day following the issuance of Michigan Attorney General Opinion 7310, the only "adverse" position related to the Plaintiffs' challenge to MCL 168.482a(1) regarding signature-invalidation requirements. Since that time, however, there is no disagreement whatsoever among the Plaintiffs, the Defendant Michigan Secretary of State and the Michigan Attorney General. Significantly, the Defendant Michigan Secretary of State and the Michigan Attorney General are in lock-step agreement, challenging the validity of the following aspects of 2018 PA 608:

- A. The portions of MCL 168.471, 168.477, and 168.483(4) involving the 15% geographic requirement;
- B. MCL 168.482(7), 168.482c regarding the check-box requirement; and
- C. MCL 168.482a(1), (2) involving the pre-circulation affidavit.

It is likely a stretch in logic to suggest that the initial disagreement was an "actual controversy" among the parties to these proceedings; however, even a case which begins as a

justiciable dispute later becomes non-justiciable if the parties are no longer adversarial or antagonistic toward each other. See, for example, *South Spring Hill Gold Mining Co. v. Amador Medean Gold Mining Company*, 145 US 300 (1892) (holding that the case had become non-justiciable because, while it was pending, the same people came to control the corporations on both sides of the litigation); see, also *American Wood-paper Co v. Heft*, 75 US 333 (1869) (holding that the case had become non-justiciable because, while it was pending, the plaintiffs purchased the patents at issue and therefore “own[ed] both sides of the subject-matter of [the] litigation”). Accordingly, whether or not an “actual controversy” ever existed in these proceedings, it certainly does not exist now absent the Legislature.

In an attempt to ignore that no actual controversy exists (absent the Legislature) in these proceedings, the Court of Appeals below observed:

“While the Legislature also argues that “[l]eaving the Court of Claims Opinion in place will result in a single member of the executive branch being able to exercise unchecked veto power over a bill that has already been passed and enacted into law,” the Court of Claims analyzed the Attorney General’s legal conclusions, this Court scrutinized those conclusions, and presumably, our Supreme Court will also consider the legal conclusions in the Attorney General’s opinion. In light of that review process, it cannot be concluded that the Attorney General has “unchecked veto power” over PA 608.”

1/27/20 Slip Op, p 9 n 10.

However, if only a mere judicial review is necessary to replace the “actual controversy” requirement as suggested by the Court of Appeals below, then the “actual controversy” requirement will always be satisfied. As Judge Boonstra noted in dissent: “Courts do not function both as advocate and adjudicator.” 1/27/20 Slip Op, p 4 (Boonstra, J, dissenting).

Accordingly, there is no actual controversy among the Plaintiffs, the Defendant Michigan Secretary of State and the Michigan Attorney General in these proceedings. Therefore, unless

the Legislature is granted standing, this Court lacks subject-matter jurisdiction over these proceedings. Compare, *United States v. Windsor*, 570 US 744 (2013).

CONCLUSION AND REQUESTED RELIEF

The Michigan Chamber of Commerce respectfully requests that this Court grant leave to appeal submitted by the Michigan Senate and House and hold that the Michigan Senate and House have standing to ask the courts to defend the validity of a Michigan election law. Unless the Michigan Senate and House are granted standing, this Court lacks subject-matter jurisdiction over these proceedings. To state these conclusions somewhat differently, but arrive at the same result: The Legislature has standing in Supreme Court No. 160908 to defend the validity of 2018 PA 608. In addition, because there is no actual controversy among the Plaintiffs, the Defendant Michigan Secretary of State, and the Michigan Attorney General, this Court lacks jurisdiction over Supreme Court No. 160907 unless the Legislative is allowed to intervene to defend 2018 PA 608.

Respectfully submitted,

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