

|  |                |  |
|--|----------------|--|
| <b>STATE OF MICHIGAN</b><br><b>JUDICIAL DISTRICT</b><br>Court of Claims <b>JUDICIAL CIRCUIT</b><br><b>COUNTY</b> | <b>SUMMONS</b> | <b>CASE NUMBER</b><br>25- 000082 -MM<br><br>Hon. Brock A. Swartzle |
| <b>Court address</b><br>Hall of Justice, 925 W. Ottawa St., Lansing, MI 48909                                    |                | <b>Court telephone number</b><br>517-373-0807                      |

|   |   |   |
|---|---|---|
| Plaintiff's name, address, and telephone number<br>Mackinac Center for Public Policy<br>140 W. Main Street<br>Midland, MI 48640<br>989-631-0900   | v | Defendant's name, address, and telephone number<br>Department of Labor and Economic Opportunity<br>320 S. Walnut St.<br>6th Floor, Elliott Larsen Building<br>Lansing, MI 48933<br>517-241-6712 |
| Plaintiff's attorney bar number, address, and telephone number<br>Patrick J. Wright (P54052)<br>Mackinac Center Legal Foundation<br>140 W. Main Street<br>Midland MI 48640 (989-631-0900) |   |   |

**Instructions:** Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (MC 21). The summons section will be completed by the court clerk.

#### Domestic Relations Case

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

#### Civil Case

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in ☐ this court, ☐ \_\_\_\_\_ Court, where

it was given case number \_\_\_\_\_ and assigned to Judge \_\_\_\_\_

The action ☐ remains ☐ is no longer pending.



Summons section completed by court clerk.

**SUMMONS**

**NOTICE TO THE DEFENDANT:** In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party **or take other lawful action with the court** (28 days if you were served by mail or you were served outside of Michigan).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

|                            |                               |  |
|----------------------------|-------------------------------|--|
| Issue date<br>May 20, 2025 | Expiration date*<br>8/19/2025 | Court clerk<br><i>Jerome W. Zimmer Jr.</i> |
|----------------------------|-------------------------------|--|

\*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

**PROOF OF SERVICE**

**TO PROCESS SERVER:** You must serve the summons and complaint and file proof of service with the court clerk before the expiration date on the summons. If you are unable to complete service, you must return this original and all copies to the court clerk.

**CERTIFICATE OF SERVICE / NONSERVICE**

☐ I served ☐ personally ☐ by registered or certified mail, return receipt requested, and delivery restricted to the addressee (copy of return receipt attached) a copy of the summons and the complaint, together with the attachments listed below, on:

☐ I have attempted to serve a copy of the summons and complaint, together with the attachments listed below, and have been unable to complete service on:

|                             |                          |
|-----------------------------|--------------------------|
| Name                        | Date and time of service |
| Place or address of service |                          |
| Attachments (if any)        |                          |

☐ I am a sheriff, deputy sheriff, bailiff, appointed court officer or attorney for a party.

☐ I am a legally competent adult who is not a party or an officer of a corporate party. I declare under the penalties of perjury that this certificate of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

|                             |                |           |                        |
|-----------------------------|----------------|-----------|------------------------|
| Service fee<br>\$           | Miles traveled | Fee<br>\$ |                        |
| Incorrect address fee<br>\$ | Miles traveled | Fee<br>\$ | <b>TOTAL FEE</b><br>\$ |

Signature

Name (type or print)

**ACKNOWLEDGMENT OF SERVICE**

I acknowledge that I have received service of a copy of the summons and complaint, together with

Attachments (if any) \_\_\_\_\_ on \_\_\_\_\_ Date and time \_\_\_\_\_

Signature \_\_\_\_\_ on behalf of \_\_\_\_\_

Name (type or print) \_\_\_\_\_

STATE OF MICHIGAN  
COURT OF CLAIMS

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MACKINAC CENTER FOR PUBLIC POLICY,  
a domestic nonprofit corporation,

Plaintiff,

v.

DEPARTMENT OF LABOR AND ECONOMIC  
OPPORTUNITY,  
a state government entity

Defendant.

No. 25- 000082 -MM

Hon. Brock A. Swartzle

**VERIFIED  
COMPLAINT**

---

MACKINAC CENTER LEGAL FOUNDATION  
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Derk A. Wilcox (P66177)  
Stephen A. Delie (P80209)  
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*Attorneys for Plaintiff*

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**MCR 1.109(D) DECLARATION**

There is no pending or resolved civil action arising out of the transaction or occurrence  
alleged in this complaint.

**VERIFIED COMPLAINT**

**INTRODUCTION**

1. The State Legislature passed, and the Governor signed, the Fiscal Year 2024-2025 General Omnibus Budget Bill, 2024 PA 121 (“FY 2024-25 general omnibus budget”).
2. The FY 2024-25 general omnibus budget was adopted in the State House with a vote of 56-54 on June 27, 2024.<sup>1</sup> It was adopted in the State Senate with a vote of 21-17 on June 27, 2024.<sup>2</sup>
3. The FY 2024-25 general omnibus budget was signed by the Governor on July 24, 2024.<sup>3</sup>
4. Our Constitution contains a provision which prohibits appropriation of money for “local or private purposes,” unless the provision receives two-thirds of the vote in both houses of the Legislature. Const 1963, art 4, § 30:

**§ 30 Appropriations; local or private purposes.**

Sec. 30. The assent of two-thirds of the members elected to and serving in each house of the legislature shall be required for the appropriation of public money or property for local or private purposes.

5. The FY 2024-25 general omnibus budget received less than two-thirds support in the House and the Senate. Two-thirds of the 110 House members would be 74, and two-thirds of the 38 Senate members would be 26. Thus, this FY 2024-25 general omnibus budget fell short of the necessary two-thirds in the House by 18 votes and fell short of the necessary two-thirds in the Senate by 5 votes.

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<sup>1</sup> 2024 House Journal 1438 (No 59, June 27, 2024). This House Journal can be accessed online here: <https://www.legislature.mi.gov/documents/2023-2024/Journal/House/pdf/2024-HJ-06-27-059.pdf>.

<sup>2</sup> 2024 Senate Journal 1272 (No 64, June 27, 2024). This Senate Journal can be accessed online here: <https://www.legislature.mi.gov/documents/2023-2024/Journal/Senate/pdf/2024-SJ-06-27-064.pdf>.

<sup>3</sup> 2024 Senate Journal 1443 (No 65, July 30, 2024). This House Journal can be accessed online here: <https://www.legislature.mi.gov/documents/2023-2024/Journal/Senate/pdf/2024-SJ-07-30-065.pdf>.



6. Because this FY 2024-25 general omnibus budget did not garner two-thirds of the votes in both legislative chambers, no appropriation within that legislation can be for a local or private purpose.
7. However, the FY 2024-25 general omnibus budget appropriates money for private and local purposes.
8. Two specific provisions of the FY 2024-25 general omnibus budget which fund local sports stadiums are challenged here.
9. More specifically, Section 1050c(6), appropriates funds for a ballpark:
- (6) From the funds appropriated in part 1 for community enhancement grants, \$1,500,000.00 shall be awarded to support capital and security improvements to a ballpark located in a city with a population between 5,000 and 5,500 in a county with a population between 800,000 and 900,000 according to the most recent federal decennial census.
10. The ballpark receiving the appropriation in the preceding paragraph is Jimmy John's Field in Utica. Complaint Exhibit 1 at p 62.
11. This allocation for a ballpark in the preceding paragraph could only be Jimmy John's Field in Utica, in Macomb County. No other ballpark could qualify for this appropriation at the time the grant was made, as no other city in Michigan met the city and county population requirements in the appropriation.<sup>4</sup>
12. The Senate Fiscal Agency's analysis of 2024 PA 121 identified this grant as being made for the "Jimmy John's Field (Utica)." Complaint Exhibit 1 at p 62.

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<sup>4</sup> Per the 2020 decennial census, Utica had a population of 5,245, and Macomb County had a population of 881,217. The U.S. Census data for Macomb County can be accessed here: <https://www.census.gov/quickfacts/fact/table/macombcountymichigan,uticacitymichigan/POP010220>.

13. Upon information and belief, Jimmy John's Field is owned by GS Entertainment LLC, a private company which is not a party to this lawsuit.

14. Jimmy John's Field is the home to four teams that play in the United Shore Professional Baseball League (USPBL).<sup>5</sup> Admission is by ticket sale.<sup>6</sup>

15. Section 1050a(8) of the FY 2024-25 general omnibus budget appropriates funds for another baseball stadium:

(8) From the funds appropriated in part 1 for community enhancement grants, \$1,000,000.00 shall be awarded to a baseball stadium located in a city with a population between 112,000 and 113,000 according to the most recent federal decennial census to support infrastructure improvements.

16. The baseball stadium receiving the appropriation in the preceding paragraph is a municipally-owned stadium in the city of Lansing, Ingham County, Michigan, where the Lansing Lugnuts play, as no other city in Michigan met the city and country population requirements in the appropriation.<sup>7</sup>

17. The Senate Fiscal Agency's analysis of 2024 PA 121 identified this grant as being made for the "Lansing Lugnuts." See Exhibit B, at page 61.

18. Although municipally-owned by the City of Lansing, the city has sold the stadium's naming rights to Jackson National Life Insurance Company through 2027 and it is referred to as Jackson Field.<sup>8</sup>

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<sup>5</sup> <https://uspbl.com/teams/>

<sup>6</sup> <https://uspbl.com/single-game-ticket-sales-in-detroit-mi/>

<sup>7</sup> Per the 2020 decennial census, Lansing had a population of 112,644 and Ingham County had a population of 284,900. The U.S. Census data for the city and county can be accessed here: <https://www.census.gov/quickfacts/fact/table/inghamcountymichigan,lansingcitymichigan/POP010220>

<sup>8</sup> <https://www.wilx.com/2020/09/01/lansing-lugnuts-stadium-renamed-to-jackson-field/>

19. The Lansing Lugnuts are the affiliate of the Major League Baseball High-A affiliate of the Athletics (formerly Oakland A's).<sup>9</sup>
20. According to press accounts, the purpose of this grant is to pay for a turf upgrade mandated by MLB.<sup>10</sup>
21. Admission to Jackson Field events is by paid ticket.<sup>11</sup>
22. Jackson Field is operated by the City of Lansing's Lansing Entertainment & Public Facilities Authority (LEPFA).<sup>12</sup> Neither Lansing nor LEPFA are a party to this lawsuit.
23. The two subject grants are appropriations for local or private purposes.
24. The FY 2024-25 general omnibus budget states that "For any grant program or project funded in part 1 for a single recipient organization or unit of local government, the grant program or project is for a public purpose..." FY 2024-25 general omnibus budget at 2024 PA 121 at § 222(1), p 224. But while the courts may consider the Legislature's declarations of what is a public purpose, such a declaration is not binding on the courts—who are the ultimate arbiter of what is a public purpose under the Constitution.

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<sup>9</sup> <https://www.mlb.com/news/featured/explore-jackson-field-home-of-the-lansing-lugnuts>

<sup>10</sup> Ellis, *Major League Baseball mandated new grass for Lansing's baseball stadium. State legislators ponied up.* Lansing State Journal, June 30, 2024. "The turf upgrade is a Major League Baseball requirement for the minor league Lansing Lugnuts to be able to play in 2025, Tristan Wright, LEPFA's director, told city council members during a May committee meeting." A copy of the article is attached as Complaint Exhibit 2.

<sup>11</sup> [https://www.ticketsales.com/jackson-field-tickets/venue?msclkid=705e3f4fb3641410dac358edc32913bb&utm\\_source=bing&utm\\_medium=cpc&utm\\_campaign=TS%20Venues%201&utm\\_term=Jackson%20Field%20Lansing%20MI%20Tickets&utm\\_content=\(v9189\)%20-%20Jackson%20Field%20-%20Lansing%20-%20MI](https://www.ticketsales.com/jackson-field-tickets/venue?msclkid=705e3f4fb3641410dac358edc32913bb&utm_source=bing&utm_medium=cpc&utm_campaign=TS%20Venues%201&utm_term=Jackson%20Field%20Lansing%20MI%20Tickets&utm_content=(v9189)%20-%20Jackson%20Field%20-%20Lansing%20-%20MI).

<sup>12</sup> <https://lepfa.com/Home/tabid/36/Default.aspx>.

25. The FY 2024-25 general omnibus budget at 2024 PA 121 at § 222(2)(c), p 224 instructs the Defendant to “Verify to the extent possible that a grant recipient will use funds for a public purpose.”

26. The two grants are illegal and unconstitutional expenditures of state funds.

### **PARTIES, STANDING, AND VENUE**

27. The Plaintiff incorporates the preceding paragraphs above as though restated herein.

28. The Plaintiff, Mackinac Center for Public Policy is a 501(c)(3) domestic nonprofit corporation organized for civic purposes headquartered in Midland, Michigan.

29. As a domestic nonprofit corporation organized for civic purposes, Plaintiff is a real party in interest pursuant to MCL 600.2041(3):

#### **600.2041 Real party in interest; actions on official or personal bonds; taxpayer's suit.**

Sec. 2041. Every action shall be prosecuted in the name of the real party in interest; but an executor, administrator, guardian, trustee of an express trust, a party with whom or in whose name a contract has been made for the benefit of another, or a party authorized by statute may sue in his own name without joining with him the party for whose benefit the action was brought, and further

...

(3) an action to prevent the illegal expenditure of state funds or to test the constitutionality of a statute relating thereto may be brought in the name of a domestic nonprofit corporation organized for civic, protective, or improvement purposes, or in the names of at least 5 residents of this state who own property assessed for direct taxation by the county wherein they reside.

30. Similarly, Plaintiff’s status as a domestic nonprofit civic corporation organized for civic, protective, or improvement purposes makes it a real party in interest under MCR 2.201(B)(4)(a):

(B) Real Party in Interest. An action must be prosecuted in the name of the real party in interest, subject to the following provisions:

...

(4) An action to prevent illegal expenditure of state funds or to test the constitutionality of a statute relating to such an expenditure may be brought:

(a) in the name of a domestic nonprofit corporation organized for civic, protective, or improvement purposes;

31. Plaintiff is filing this litigation seeking to prevent the illegal and unconstitutional expenditure of state funds.

32. MCL 600.2041(3) provides standing to Plaintiff as a non-profit seeking to prevent unconstitutional spending:

“MCL 600.2041(3) does more than imply an intent by the Legislature to confer standing on domestic nonprofit corporations that seek to challenge the constitutionality of a statute that allegedly provides for the illegal expenditure of state funds; it expressly declares that intent. Accordingly, plaintiffs have standing to pursue their constitutional claims.”

*Council of Org and Others for Educ About Parochaid v Michigan*, 326 Mich App 124, 137-38 (2018).

33. Defendant, the Department of Labor and Economic Opportunity (“LEO”) is a state government agency headquartered in Ingham County, Michigan. It is a principal department of the executive branch of state government created under Executive Order 2019-13, MCL 125.1998(1), and the authority of Const 1963, art 5, § 2.

34. Venue is proper pursuant to MCL 600.6419(1)(a).

35. Pursuant to MCL 600.6419(1)(a), the Court of Claims has jurisdiction over this claim.

**COUNT I—THE GRANT TO JIMMY JOHN’S FIELD IS  
UNCONSTITUTIONAL BECAUSE IT SERVES A PRIVATE  
AND A LOCAL PURPOSE**

36. The Plaintiff incorporates the preceding paragraphs above as though restated herein.

37. The grant in Sec 1050c(6) was made for a local purpose, as that grant can only refer to Jimmy John's field.
38. The grant in Sec 1050c(6) was not made for a general purpose that benefited the State as a whole.
39. An appropriation that primarily benefits a corporation or individual serves a private purpose.
40. Whether an appropriation serves a private or a public purpose is a judicial question.
41. Jimmy John's Field is owned by a private corporation and not a public body. Upon information and belief, Jimmy John's Field is owned by GS Entertainment LLC (which is not a party to this action).
42. Generally, under our Constitution, economic development is not considered a public use.

Const 1963, art 10, § 2:

"Public use" does not include the taking of private property for transfer to a private entity for the purpose of economic development or enhancement of tax revenues. Private property otherwise may be taken for reasons of public use as that term is understood on the effective date of the amendment to this constitution that added this paragraph.

43. The Legislature's determination that an expenditure serves a public purpose is not dispositive and the courts are not bound by such a determination. *In re Advisory Op. re Const. of PA 1975 No 301*, 400 Mich 270, 272 n 5 (1977):

The legislative determination that this program is necessary for the promotion of the public welfare does not mandate the conclusion that resulting internal improvements are public. All acts of the Legislature presumably promote the public welfare but that premise does not insulate them from judicial review for constitutionality. The entire concept and process of judicial review would be without foundation if the Legislature could, by its own declaration, determinatively conclude the meaning to be ascribed to the constitution. See *Marbury v Madison*, 5 US (1 Cranch) 137 (1803).

44. The grant for Jimmy John's Field is an unconstitutional expenditure for a private purpose since it did not receive the necessary two-thirds vote in both chambers of the Legislature.

**COUNT II—THE GRANT TO JACKSON FIELD  
IS UNCONSTITUTIONAL BECAUSE IT SERVES A LOCAL PURPOSE**

45. The Plaintiff incorporates the preceding paragraphs above as though restated herein.
46. 2024 PA 121, Sec 1050a(8) provided the following grant: “From the funds appropriated in part 1 for community enhancement grants, \$1,000,000.00 shall be awarded to a baseball stadium located in a city with a population between 112,000 and 113,000 according to the most recent federal decennial census to support infrastructure improvements.”
47. The description in Sec 1050a(8) is for a local purpose since it could only apply to Jackson Field.
48. This grant in Sec 1050a(8) did not pass with a two-thirds vote in both chambers of the legislature.
49. This grant in Sec 1050a(8) was not made for a general purpose that benefited the state as a whole.
50. Whether an appropriation serves a local purpose is a judicial question.
51. This grant for Jackson Field is an unconstitutional local purpose expenditure pursuant to Const 1963, art 4, § 30, since it did not receive the necessary two-thirds vote in both chambers of the Legislature.

**RELIEF REQUESTED**

For the reasons stated here, the two subject grants are unconstitutional and are null and void. Plaintiff asks this Court to enjoin any expenditure of the appropriated funds. If any subject funds have already been disbursed, then Plaintiff requests that the funds be recalled and deposited into the state treasury. Plaintiff further asks this Court to issue a declaratory judgment that these two grants are null and void for the reasons set forth in the Complaint.

Alternatively, Plaintiff requests that this Court fashion an equitable remedy suitable to right this wrong and curtail future evasions of constitutional requirements. “[C]ourts possess broad equitable powers to right statutory and constitutional wrongs. Those powers are defined by pragmatic flexibility. ... With those principles in mind, this Court must fashion equitable relief that remedies the Legislature’s constitutional mischief while remaining mindful of [] reasonable reliance on the Legislature’s unconstitutional acts.” *Mothering Justice v Attorney General*, \_\_\_\_ Mich \_\_\_, slip copy at 29-30 (2024), 2024 WL 3610042 (July 31, 2024) at \* 14.

Respectfully submitted,

By: /s/ Patrick J. Wright  
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Mackinac Center for Public Policy

Dated: May 20, 2025



STATE OF MICHIGAN  
COURT OF CLAIMS

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MACKINAC CENTER FOR PUBLIC POLICY,  
a domestic nonprofit corporation,

Plaintiff,

v.

DEPARTMENT OF LABOR AND ECONOMIC  
OPPORTUNITY,  
a state government entity

Defendant.

No. 25-\_\_\_\_\_-MM

Hon. \_\_\_\_\_

**PLAINTIFF'S  
5/20/2025 INDEX OF  
EXHIBITS**

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MACKINAC CENTER LEGAL FOUNDATION  
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**INDEX OF EXHIBITS**

| <b><u>Exhibit</u></b> | <b><u>Description</u></b>   |
|-----------------------|---|
| 1                     | Senate Fiscal Agency Analysis of 2024 PA 121, FY 2024-2025 General<br>Omnibus Appropriation Bill, 102 Sess at 57-66 (2024). |
| 2                     | Lansing State Journal: Major League Baseball Mandate Article  |

Exhibit 1: Senate Fiscal Agency Analysis of  
2024 PA 121, FY 2024-2025 General  
Omnibus Appropriation Bill, 102 Sess at 57-  
66 (2024).



Senate Fiscal Agency

P.O. Box 30036

Lansing, Michigan 48909-7536

BILL



ANALYSIS

Telephone: (517) 373-5383

Fax: (517) 373-1986

**Senate Bill 747 (CR-1):  
FY 2024-25 General Omnibus Appropriation Bill**

**Bill Page Nos.**

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\* General Government includes FY 2024-25 appropriations for the following budget areas: Attorney General; Civil Rights; Executive; Labor and Economic Opportunity; Legislature; State; Technology, Management, and Budget; and Treasury.

Date Completed: 6-26-24

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**FY 2024-25 LABOR AND ECONOMIC OPPORTUNITY BUDGET**  
S.B. 747 (CR-1): CONFERENCE REPORT  
Article 9

| FULL-TIME EQUIVATED (FTE) CLASSIFIED<br>POSITIONS/FUNDING SOURCE | FY 2023-24<br>YEAR-TO-DATE* | FY 2024-25<br>CONFERENCE REPORT | CHANGES FROM<br>FY 2023-24 YEAR-TO-DATE |               |
|--|-----------------------------|---------------------------------|---|---------------|
|  |                             |                                 | AMOUNT                                  | PERCENT       |
| FTE Positions .....  | 2,614.4                     | 2,637.0                         | 22.6                                    | 0.9           |
| <b>GROSS .....</b>   | <b>2,867,264,800</b>        | <b>2,430,969,500</b>            | <b>(436,295,300)</b>                    | <b>(15.3)</b> |
| Less:  |                             |                                 |   |               |
| Interdepartmental Grants Received .....                          | 0                           | 0                               | 0                                       | 0.0           |
| <b>ADJUSTED GROSS .....</b>                                      | <b>2,867,264,800</b>        | <b>2,430,969,500</b>            | <b>(436,295,300)</b>                    | <b>(15.3)</b> |
| Less:  |                             |                                 |   |               |
| Federal Funds .....  | 1,183,654,200               | 1,191,165,800                   | 7,511,600                               | 0.6           |
| Local and Private .....  | 23,239,200                  | 23,284,600                      | 45,400                                  | 0.2           |
| <b>TOTAL STATE SPENDING .....</b>                                | <b>1,660,371,400</b>        | <b>1,216,519,100</b>            | <b>(443,852,300)</b>                    | <b>(26.8)</b> |
| Less:  |                             |                                 |   |               |
| Other State Restricted Funds .....                               | 358,863,400                 | 413,774,700                     | 54,911,300                              | 15.3          |
| <b>GENERAL FUND/GENERAL PURPOSE .....</b>                        | <b>1,301,508,000</b>        | <b>802,744,400</b>              | <b>(498,763,600)</b>                    | <b>(38.4)</b> |
| <b>PAYMENTS TO LOCALS .....</b>                                  | <b>72,724,900</b>           | <b>75,654,900</b>               | <b>2,930,000</b>                        | <b>4.0</b>    |

\*As of February 7, 2024.

**Major Boilerplate Changes from FY 2023-24 Year-to-Date:**

- Deleted Sections.** The Conference Deleted several sections, which includes: 214 (Department Metric), 218 (State Administration Board Transfers), 222 (Severance Pay Report), 223 (In-Person Work), 225 (Savings Identified in Audit), 403 (Community Development Block Grants), 701 (Tri-Share Child Care Program), 706 (Going Pro Report Expenditures), 715 (Michigan Reconnect Grant Program) and all FY 2023-24 One-Time Sections.
- New Sections.** The Conference included several new sections, which include: 308 (Restriction on Casino Investment), 404 (2.0 MSHDA FTEs designation), 715 (Office of Rural Prosperity), 716 (Community and Worker Economic Transition Office), 717 (VITA), 905 (PASREP), and One-Time Sections Sec. 1000-1054.
- Major Modification.** The Conference made major modification to the following sections: 223 (Grant Transparency Requirements), 401 (MSHDA Report), 451 (State Land Bank Authority), 503 (Pure Michigan, General Fund Dollars), 504 (Pure Michigan, Local Promotion Fund), 507 (MEDC Activity Report), 509 (Limits on Land Purchases), 523 (Arts and Cultural Grant Program), 518 (Partnership Initiative), 525 (Business Attraction and Community Revitalization Work Project Report), 526 9Job Creation Expenditure Report), 533 (Revitalization and Placemaking Report), 706 (Going Pro Report), 707 (Going Pro Administration), 804 (UIA IN-Person Work), 906 (Centers for Independent Living), 951 (Commission Report), and 953 (Office of Global Michigan Report).



FY 2024-25 LABOR AND ECONOMIC OPPORTUNITY BUDGET  
S.B. 747 (CR-1): CONFERENCE REPORT

| FY 2023-24 Year-to-Date Appropriation                |  | CHANGE FROM<br>FY 2023-24 Y-T-D |                 | FY 2024-25 RECOMMENDED<br>APPROPRIATION |            |
|--|--|---------------------------------|-----------------|---|------------|
|  |  | Gross                           | GF/GP           | Gross                                   | GF/GP      |
| <b>Baseline Adjustments</b>                          |  |                                 |                 |   |            |
| 1. Bureau of Services for Blind Persons.             | The Conference included increased Federal authorization to recognize increased Federal revenue.  | 3,435,100                       | 0               | 29,736,700                              | 6,315,700  |
| 2. Office of Rural Prosperity Transfer.              | The Conference transferred the Office of Rural Prosperity, which included 1.0 FTE and \$697,400, from MDARD in accordance with Executive Order 2023-6.                             | 697,400                         | 697,400         | 697,400                                 | 697,400    |
| 3. State Historic Preservation Office.               | The Conference increased additional Fees and Charges received by the State Historic Preservation Office.   | 300,000                         | 0               | 500,000                                 | 0          |
| 4. Michigan Arts and Cultural Grants.                | The Conference increased private funding \$50,000 for additional private fund received by the Council.   | 50,000                          | 0               | 11,129,200                              | 9,879,200  |
| 5. Removal of FY 2023-24 One-Time Appropriations.    | The Conference removed FY 2023-24 One-Time Appropriations.   | (1,043,330,000)                 | (1,018,330,000) | 0                                       | 0          |
| 6. MiLEAP Transfer.                                  | The Conference transferred 12.0 FTEs and \$68.7 million to MiLEAP in accordance with Executive Order 2023-6.   | (68,674,200)                    | (68,674,200)    | 0                                       | 0          |
| 7. Technical Adjustments.                            | The Conference reduced Federal and restricted revenue throughout the budget to align with anticipated revenue.   | (6,479,500)                     | 0               | N/A                                     | N/A        |
| 8. Economic Adjustments.                             | Includes \$11,034,300 Gross and \$1,556,200 GF/GP for total economic adjustments.  | 11,034,300                      | 1,556,200       | N/A                                     | N/A        |
| <b>New Programs/Program Increases</b>                |  |                                 |                 |   |            |
| 9. Vocational Rehabilitation.                        | The Conference included \$5.9 million Gross, \$4.6 million Federal, and \$1.3 million GF/GP to appropriate available Federal matching dollars to Michigan Rehabilitation Services. | 5,852,600                       | 1,250,000       | 145,412,200                             | 23,064,500 |
| 10. Office of Global Michigan.                       | The Conference included an additional \$4.0 million ongoing for the Office of Global Michigan.   | 4,000,000                       | 4,000,000       | 43,949,800                              | 5,530,700  |
| 11. Community and Worker Economic Transition Office. | The Conference created a new office with 10.0 FTEs and \$2.5 million.  | 2,500,000                       | 2,500,000       | 2,500,000                               | 2,500,000  |



FY 2024-25 LABOR AND ECONOMIC OPPORTUNITY BUDGET  
S.B. 747 (CR-1): CONFERENCE REPORT

|   | CHANGE FROM<br>FY 2023-24 Y-T-D |             | FY 2024-25 RECOMMENDED<br>APPROPRIATION |             |
|---|---------------------------------|-------------|---|-------------|
|   | Gross                           | GF/GP       | Gross                                   | GF/GP       |
| <b>12. Worker's Disability Compensation Agency Fee Increase.</b> The Conference included an additional \$1.5 million in Fee revenue to appropriate a proposed fee increases for the Agency.   | 1,500,000                       | 0           | 9,982,500                               | 3,578,600   |
| <b>13. Arts and Cultural Grants.</b> The Conference included an additional \$1,250,000 for Arts and Cultural Grants.  | 1,250,000                       | 1,250,000   | 12,379,200                              | 11,129,200  |
| <b>14. Pure Michigan.</b> The Conference included an additional \$1.0 million for Pure Michigan   | 1,000,000                       | 1,000,000   | 26,000,000                              | 16,000,000  |
| <b>15. Voluntary Income Tax Assistance Grants.</b> The Conference included support to voluntary income tax assistance programs.   | 1,000,000                       | 1,000,000   | 1,000,000                               | 1,000,000   |
| <b>16. Prosperity Bureau.</b> The Conference included 4.0 FTE positions and \$600,000 ongoing to support the Prosperity Bureau.   | 600,000                         | 600,000     | 600,000                                 | 600,000     |
| <b>17. Radiation Safety Fees.</b> The Conference included 4.6 FTEs and \$582,000 in Fee revenue to appropriate anticipated additional restricted revenue.   | 582,000                         | 0           | 37,474,600                              | 0           |
| <b>18. Personal Assistance Services Reimbursement for Employment Program (PASREP).</b> The Conference included an additional \$400,000 in Michigan Rehabilitation Services for the Centers for Independent Living to manage the PASREP. | 400,000                         | 400,000     | 400,000                                 | 400,000     |
| <b>19. Housing and Rental Assistance.</b> The Conference included an additional 15.0 FTEs to support the Michigan State Housing Development Authority.  | 0                               | 0           | 51,448,200                              | 48,674,900  |
| <b><u>Eliminations/Reductions - NONE</u></b>  |                                 |             |   |             |
| <b><u>One-Time Appropriations</u></b>   |                                 |             |   |             |
| <b>20. Individual Grants.</b> The Conference included \$379,162,000 in One-Time funding to provide grants to individual recipients out line in the one-time document.   | 379,162,000                     | 379,162,000 | 379,162,000                             | 379,162,000 |
| <b>21. Housing Affordability.</b> The Conference included a number of One-Time housing affordability programs.  | 100,000,000                     | 100,000,000 | 100,000,000                             | 100,000,000 |
| <b>22. Michigan Innovation Fund.</b> The Conference proposed a transfer of \$60.0 million from the Venture Michigan Fund to a new innovation fund to support startup business activities. This would require a statute change.          | 60,000,000                      | 0           | 60,000,000                              | 0           |



FY 2024-25 LABOR AND ECONOMIC OPPORTUNITY BUDGET  
S.B. 747 (CR-1): CONFERENCE REPORT

|   | CHANGE FROM<br>FY 2023-24 Y-T-D |            | FY 2024-25 RECOMMENDED<br>APPROPRIATION |            |
|---|---------------------------------|------------|---|------------|
|   | Gross                           | GF/GP      | Gross                                   | GF/GP      |
| <b>23. Grant Programs.</b> The Conference included \$34,825,000 in One-Time funding for various grant programs, which includes: Community Museum Grants (\$18.0 million), Minority Owned Business Grants (\$10.0), Community Development Financial Institutions (\$5.0 million), Symphony Orchestra Grants (\$6.0 million), Office of Rural Prosperity Grants (\$2.5 million), Short-Term Loan Grants 9(\$2.5 million), and Housing Readiness Incentive Grants (\$2,325,000). | 46,325,000                      | 46,325,000 | 46,325,000                              | 46,325,000 |
| <b>24. Talent and Growth Program.</b> The Conference included \$45.5 million in One-Time for the Talent and Growth Program.   | 45,500,000                      | 45,500,000 | 45,500,000                              | 45,500,000 |
| <b>25. Pure Michigan.</b> The Conference included \$14.0 million in One-Time funding in addition to ongoing funding for Pure Michigan.  | 14,000,000                      | 0          | 40,000,000                              | 16,000,000 |
| <b>26. Centers for Independent Living.</b> The Conference included \$1.0 million in One-Time funding in addition to ongoing funding for the Centers for Independent Living  | 1,000,000                       | 1,000,000  | 20,718,600                              | 20,718,600 |
| <b>27. Office of Global Michigan.</b> The Conference included \$1.0 million in One-Time funding in addition to ongoing funding for the Office of Global Michigan  | 1,000,000                       | 1,000,000  | 44,949,800                              | 5,530,700  |
| <b>28. Prosperity Bureau.</b> The Conference included \$500,000 in One-Time funding in addition to ongoing funding for the Prosperity Bureau  | 500,000                         | 500,000    | 1,100,000                               | 1,100,000  |
| <b>29. Language Access.</b> The Conference included One-Time Corporation Fees to coordinate language access initiatives throughout state agencies. Funding is also included in the DTMB budget.   | 500,000                         | 500,000    | 500,000                                 | 500,000    |
| <u>Other</u>  |                                 |            |   |            |
| <b>30. State Trade Export Program.</b> The Conference rolled the State Trade Export Program line item into the Job Creation Services line item.   | 0                               | 0          | N/A                                     | N/A        |

Total Changes..... (\$436,295,300) (\$498,763,600)

**FY 2024-25 CONFERENCE REPORT .....** **\$2,430,969,500** **\$802,744,400**

**Amount Over/(Under) GF/GP Target .....** **\$0**



| One Time Appropriation |   | 647,987,000 |
|------------------------|---|-------------|
| Sec #                  | Line Item Name (Grant Item)                           | Amount      |
|                        | 1001 <b>Agricultural tourism hub redevelopment</b>    | 2,000,000   |
|                        | 1002 <b>Auto show public safety</b>                   | 225,000     |
|                        | 1003 <b>Brownstown municipal infrastructure</b>       | 1,500,000   |
|                        | 1004 <b>Centers for social enterprise development</b> | 1,000,000   |
|                        | <b>Centers for independent living</b>                 | 1,000,000   |
|                        | 1005 <b>Chinatown</b>                                 | 1,000,000   |
|                        | 1006 <b>Community developing (Danika)</b>             | 100,000     |
|                        | 1007 <b>CDFI</b>                                      | 5,000,000   |
| 1050a                  | <b>Community enhancement grants</b>                   |             |
|                        | 1 "Small Talk" Program                                | 1,500,000   |
|                        | 2 Building 21 Teen Center                             | 320,000     |
|                        | 3 LMTS Community Center                               | 500,000     |
|                        | 4 First Presbyterian Church of Lansing                | 500,000     |
|                        | 5 Lansing Schools Infrastructure                      | 2,500,000   |
|                        | 6 Holt Schools Feasibility Study                      | 150,000     |
|                        | 7 Potter Park Zoo Infrastructure                      | 10,000,000  |
|                        | 8 Lansing Lugnuts                                     | 1,000,000   |
|                        | 9 Plaza Roosevelt Park Improvements                   | 5,000,000   |
|                        | 10 Grand Rapids Civic Theater sidewalk reconstruction | 527,000     |
|                        | 11 Veterans Park Improvements                         | 500,000     |
|                        | 12 NAYA   | 500,000     |
|                        | 13 GRABB  | 500,000     |
|                        | 14 Downtown Boxing                                    | 2,000,000   |
|                        | 15 Hazel Park Library                                 | 200,000     |
|                        | 16 Berston Fieldhouse                                 | 3,000,000   |
|                        | 17 Sylvester Broome EV                                | 250,000     |
|                        | 18 Communities First (Marian Hall)                    | 1,500,000   |
|                        | 19 St. Luke Community Center                          | 3,000,000   |
|                        | 20 Taylor Historical Society                          | 100,000     |
|                        | 21 City of Ecorse Park                                | 200,000     |
|                        | 22 City of Algonac Community Infrastructure           | 1,000,000   |
|                        | 23 Mount Clemens Downtown Redevelopment               | 5,000,000   |
|                        | 24 Ecumenical Senior Center                           | 1,000,000   |
|                        | 25 Eastside Soup Kitchen (Saginaw)                    | 1,000,000   |
| 1050b                  |   |             |
|                        | 1 Northfield township park development                | 2,000,000   |
|                        | 2 MI Minority Supplier Developer                      | 2,000,000   |
|                        | 3 Detroit Rescue Mission                              | 1,500,000   |
|                        | 4 100k ideas  | 1,500,000   |
|                        | 5 MSU Apple App Development Academy                   | 1,000,000   |
|                        | 6 YMCA state alliance                                 | 3,500,000   |
|                        | 7 Communities in Schools                              | 1,000,000   |
|                        | 8 Council of Women in Technology                      | 250,000     |
|                        | 9 Downriver Community Conference                      | 6,500,000   |
|                        | 10 Family Learning Institute                          | 150,000     |
|                        | 11 Inkster Community Center                           | 900,000     |
|                        | 12 Canton township                                    | 1,000,000   |



|       |  |           |
|-------|--|-----------|
|       | 13 City of Jackson DDA   | 4,500,000 |
|       | 14 Residents in Action non-profit                                    | 1,000,000 |
|       | 15 Durand Union Station, Inc   | 1,000,000 |
|       | 16 City of Warren Parks  | 1,000,000 |
|       | 17 Arts & Scraps   | 150,000   |
|       | 18 Tatiana Grant   | 250,000   |
|       | 19 GABA  | 1,000,000 |
|       | 20 West Michigan Teacher Collaborative                               | 2,000,000 |
|       | 21 Anchor Bay School (Early Childhood Center)                        | 750,000   |
|       | 22 GR Public Museum  | 1,000,000 |
|       | 23 Muskegon Public Access Point                                      | 1,000,000 |
|       | 24 Indoor Sports Facility (Shelby Township)                          | 2,500,000 |
| 1050c |  |           |
|       | 1 Mackinac Island Land Acquisition                                   | 3,200,000 |
|       | 2 West Michigan Sport Complex  | 3,000,000 |
|       | 3 Van Andel Institute  | 1,000,000 |
|       | 4 Hillsdale Hospital   | 3,500,000 |
|       | 5 Rochester Community House  | 2,000,000 |
|       | 6 Jimmy John's Field (Utica)   | 1,500,000 |
|       | 7 Troy Fire Ladder Truck   | 1,900,000 |
|       | 8 Mt Pleasant Road Sealing   | 2,000,000 |
|       | 9 Mascon County Road Repairs   | 1,000,000 |
|       | 10 The New Foster Care   | 1,900,000 |
|       | 11 Gogebic labor and delivery hospital                               | 1,200,000 |
|       | 12 Fish Pass   | 1,000,000 |
|       | 13 Sault Ste. Marie (Chippewa Indians)                               | 750,000   |
|       | 14 Sault Ste. Marie Snowmobile Track Renovations                     | 250,000   |
|       | 15 Election Centers (East Lansing, Ann Arbor, Grand Rapids, Lansing) | 4,000,000 |
|       | 16 Jim Crow Museum   | 4,000,000 |
|       | 17 Hospitality Industry Training Program                             | 2,000,000 |
|       | 18 MSU Child Development Lab   | 2,000,000 |
|       | 19 Sherwood Pool Renovations - Saginaw                               | 1,900,000 |
|       | 20 St. Mark's Community Outreach Center                              | 1,500,000 |
|       | 21 Zekelman Holocaust Center   | 1,500,000 |
|       | 22 Marquette Regional History Center mortgage payoff                 | 1,000,000 |
|       | 23 Detroit Blight Busters neighborhood block grants                  | 1,000,000 |
|       | 24 Flint blight elimination  | 1,000,000 |
|       | 25 Beyond Basic  | 1,000,000 |
| 1050d |  |           |
|       | 1 Fisher Building  | 1,000,000 |
|       | 2 College Career & Beyond  | 1,000,000 |
|       | 3 7 Mile House Detroit   | 1,000,000 |
|       | 4 WDET Detroit Public Radio  | 1,000,000 |
|       | 5 WISE (Women's Innovative Social Enterprise Partnership)            | 1,000,000 |
|       | 6 St. Vincent and Sarah Fischer Center in Detroit                    | 700,000   |
|       | 7 PartnerShift Network Workforce Success Initiative (WSI)            | 600,000   |
|       | 8 Berrien County Workforce Innovation Center                         | 500,000   |
|       | 9 Blandford Nature Center  | 500,000   |
|       | 10 Chaldean American Social Service Advocates                        | 500,000   |

|       |  |            |
|-------|--|------------|
| 11    | Greater Pontiac Community Coalition                                    | 500,000    |
| 12    | Prince Hall Most Worshipful Grand Lodge                                | 500,000    |
| 13    | Great Lakes Center for the Arts  | 500,000    |
| 14    | Bridgeport gun range   | 425,000    |
| 15    | Voces Latinx Community Hall  | 300,000    |
| 16    | Faith Foundation Resources in Flint                                    | 300,000    |
| 17    | Women and Men Working for Change                                       | 250,000    |
| 18    | Violet T. Lewis senior home  | 250,000    |
| 19    | South Haven Region Business Hub  | 160,000    |
| 20    | Mosaic Career Pathways Institute                                       | 150,000    |
| 21    | Caring Connection - Benton Harbor                                      | 100,000    |
| 22    | LA SED Detroit   | 100,000    |
| 23    | Malcolm X House historic renovation in Inkster                         | 80,000     |
| 24    | Royal Oak Twp recreation activates for youths and seniors              | 50,000     |
| 25    | New Level Sports Youth Village Early Childhood Development Center      | 50,000     |
| 26    | Kingdom Builders Worldwide Facility Improvements                       | 50,000     |
| 27    | Washington Heights United Methodist Church & Community, Apprenticeship | 50,000     |
| 28    | Pinkney Youth Community Development Center                             | 40,000     |
| 29    | Krause Memorial Library Expansion                                      | 1,000,000  |
| 30    | Gladstone Senior Center  | 500,000    |
| 31    | Stephenson Area Public Schools   | 400,000    |
| 1050e | Ethanol Rebates for Retailers  | 3,000,000  |
| 1008  | <b>Community museum grants</b>   |            |
| 1     | Motown Museum  | 5,000,000  |
| 2     | Muskegon Museum of History and Science                                 | 2,000,000  |
| 3     | Chaldean Museum  | 1,000,000  |
| 4     | Michigan Flight Museum   | 1,000,000  |
| 5     | Competitive Museum Grants  | 9,000,000  |
| 1010  | <b>Developing kids</b>   | 1,000,000  |
| 1011  | <b>Downtown development (Redford)</b>                                  | 150,000    |
| 1012  | <b>Focus: HOPE</b>   | 1,000,000  |
| 1013  | <b>Forest products workforce training and development program</b>      | 750,000    |
| 1014  | <b>Foster care aging-out services (Kirsten's Touch)</b>                | 100,000    |
| 1015  | <b>Health and healing center</b>                                       | 1,500,000  |
| 1051  | <b>Healthcare grants</b>   |            |
| 1     | Eaton Rapids Hospital infrastructure modernization                     | 5,000,000  |
| 2     | Michigan Medicine  | 5,000,000  |
| 3     | Cristo Rey (Lansing)   | 1,000,000  |
| 4     | Pine Rest (Pediatric Center)   | 12,500,000 |
| 5     | Cherry Health  | 1,650,000  |
| 6     | City of Grand Rapids (Mental Health Crisis co-response)                | 250,000    |
| 7     | BAMF Detroit   | 5,000,000  |
| 8     | CEDAM VITA grants  | 3,300,000  |
| 9     | Oakland Health network   | 1,000,000  |
| 10    | East Warren Development Corp   | 2,000,000  |
| 11    | Sacred Heart Rehabilitation Center                                     | 2,200,000  |
| 12    | Mundy township (Senior center)   | 2,000,000  |
| 13    | LatinX Community Center  | 2,000,000  |
| 14    | SRSly Dexter   | 125,000    |

|       |   |            |
|-------|---|------------|
| 1016  | <b>High impact tutoring pilot program</b>               | 500,000    |
| 1017  | <b>Hispanic community center</b>                        | 750,000    |
| 1018  | <b>Holistic workforce development</b>                   | 1,000,000  |
| 1052  | <b>Housing grants</b>                                   |            |
| 1     | Lansing Rescue Mission                                  | 1,000,000  |
| 2     | AYA Youth Collective                                    | 450,000    |
| 3     | Michigan Advocacy Program                               | 1,000,000  |
| 4     | Emergency Shelter grants (Washtenaw)                    | 1,000,000  |
| 5     | Home Builders booklets                                  | 400,000    |
| 1019  | <b>Housing Programs</b>                                 |            |
| 1     | Ingham County Housing Trust                             | 15,000,000 |
| 2     | Grand Traverse ISD Housing Development                  | 5,000,000  |
| 3     | Portage Mixed Income Housing Development                | 5,000,000  |
| 4     | Dundee Village Housing Development                      | 4,000,000  |
| 5     | (Lansing)   | 3,300,000  |
| 6     | (Lansing)   | 3,000,000  |
| 7     | (Warren)  | 3,000,000  |
| 8     | (Muskegon)  | 3,000,000  |
| 9     | (Detroit)   | 3,000,000  |
| 10    | Dewitt Manufactured Housing Complex                     | 2,000,000  |
| 11    | Delta Township Affordable Housing Development Project   | 2,000,000  |
| 12    | Amplify Grand Rapids                                    | 1,500,000  |
| 13    | Well House (Grand Rapids)                               | 360,000    |
| 14    | Faith-Based Affordable Housing Grant                    | 2,500,000  |
| 15    | Housing Industry Competitive Grants                     | 5,000,000  |
| 16    | MSHDA Downpayment Assistance                            | 8,940,000  |
| 1020  | <b>Housing readiness incentive grant program</b>        | 2,325,000  |
| 1021  | <b>Housing stock and homeowner affordability</b>        | 33,400,000 |
| 1053a | <b>Infrastructure grants</b>                            |            |
| 1     | Sea wall project (GP Shores)                            | 1,000,000  |
| 2     | City of New Baltimore (Break wall project )             | 2,000,000  |
| 3     | City of Ypsilanti (Community infrastructure projects)   | 3,000,000  |
| 4     | Bay City (Bridge cost reimbursement)                    | 1,600,000  |
| 5     | Clawson (Water infrastructure)                          | 1,000,000  |
| 6     | Oak Park (Water and road infrastructure)                | 2,000,000  |
| 7     | Garden City (Sidewalk improvements)                     | 2,500,000  |
| 8     | Brooklyn (School routes)                                | 450,000    |
| 9     | CATA (Facility improvements)                            | 5,000,000  |
| 10    | Invest Detroit (Senior Housing)                         | 2,000,000  |
| 11    | Taylor / Wayne Co (Community infrastructure)            | 5,000,000  |
| 12    | Kalamazoo Co (Tornado relief)                           | 2,000,000  |
| 13    | Lathrup Village (Community infrastructure)              | 2,000,000  |
| 14    | Warrendale Business Association (Corridor improvements) | 2,500,000  |
| 15    | MI Assn of Municipal Clerks                             | 1,035,000  |
| 16    | BWL Steam Conversion Project                            | 5,000,000  |
| 17    | Eaton County Bank Intercounty Drain Project             | 5,000,000  |
| 18    | Frankenmuth Youth Sports Complex                        | 10,000,000 |
| 19    | Detroit Zoo Infrastructure                              | 7,000,000  |
| 20    | Bonstelle Theatre Detroit                               | 5,000,000  |



|       |   |            |
|-------|---|------------|
|       | 21 Wyoming Non-motorized Trail  | 3,000,000  |
|       | 22 Washtenaw Huron Waterloo Pathways Border-To-Border trail             | 3,000,000  |
|       | 23 Canton Township Summit Renovation                                    | 2,500,000  |
|       | 24 City of Hamtramck Public Works                                       | 2,000,000  |
|       | 25 Hamtramck Negro League Field/Veterans Park                           | 2,000,000  |
| 1053b |   |            |
|       | 1 Dimondale Water Hookup to BWL   | 2,000,000  |
|       | 2 Mount Clemens Riverfront Revitalization                               | 2,000,000  |
|       | 3 Wyandotte Downriver Arts Center Historic Rehab                        | 2,000,000  |
|       | 4 Saginaw Memorial Cup  | 1,600,000  |
|       | 5 Mount Clemens Septic Station Project                                  | 1,500,000  |
|       | 6 Oak Hill Cemetery - Battle Creek                                      | 1,200,000  |
|       | 7 Ironwood Ski Jump - Pine Mountain Ski Jump at Veterans Park           | 1,000,000  |
|       | 8 Oak Valley Park in Pittsfield Twp                                     | 1,000,000  |
|       | 9 Oak Park Community/Recreation Center                                  | 1,000,000  |
|       | 10 Judson Center Royal Oak campus renovations                           | 1,000,000  |
|       | 11 Dickinson County road replacement: County 573 Rd                     | 1,000,000  |
|       | 12 Detroit Parks Coalition infrastructure & accessibility               | 1,000,000  |
|       | 13 City of Detroit Public Parks and Greenway Infrastructure             | 1,000,000  |
|       | 14 Wayne Port Authority   | 1,000,000  |
|       | 15 Grand Rapids Ford Airport Control Tower Local Match                  | 2,000,000  |
|       | 16 West Bloomfield Twp Greer Road bridge replacement                    | 800,000    |
|       | 17 Waterford Twp Senior Center  | 500,000    |
|       | 18 Wayne County school infrastructure                                   | 500,000    |
|       | 19 Public Wi-Fi in Greektown area Detroit                               | 300,000    |
|       | 20 Innovate Albion elevator installation                                | 250,000    |
|       | 21 Buena Vista Twp township admin offices                               | 1,000,000  |
|       | 22 Bridgman City Hall Rehab   | 150,000    |
|       | 23 City of Benton Harbor DDA - State Street Theatre Study               | 30,000     |
|       | 24 Sumpter Twp park   | 25,000     |
|       | 25 Hamburg Twp Museum   | 20,000     |
|       | 26 Scio Twp Road Improvements   | 1,000,000  |
| 1022  | <b>Jewish family services</b>   | 1,200,000  |
| 1023  | <b>Junior achievement</b>   | 1,000,000  |
|       | <b>Language access</b>  | 500,000    |
| 1024  | <b>Life leader</b>  | 750,000    |
| 1025  | <b>Math and reading academies</b>                                       | 1,000,000  |
| 1026  | <b>Michigan innovation fund</b>   | 60,000,000 |
| 1027  | <b>Michigan women forward</b>   | 1,500,000  |
| 1028  | <b>Michigan works! skills scholarship</b>                               | 1,000,000  |
| 1029  | <b>Michigan's high-tech talent development</b>                          | 2,000,000  |
| 1030  | <b>Michigan minority owned business</b>                                 | 10,000,000 |
| 1031  | <b>Nutritional support program (Meals on wheel of western Michigan)</b> | 2,000,000  |
|       | <b>Office of global Michigan</b>  | 1,000,000  |
| 1032  | <b>Office of rural prosperity</b>                                       | 2,500,000  |
| 1033  | <b>Police athletic league</b>   | 250,000    |
| 1034  | <b>Post-incarceration employment</b>                                    | 1,000,000  |
|       | <b>Prosperity bureau</b>  | 500,000    |
| 1035  | <b>Psygenics</b>  | 250,000    |

|   |            |
|---|------------|
| <b>1054 Public safety grants</b>                                  |            |
| 1 Ingham JJ Facility  | 12,500,000 |
| 2 Hamtramck (Firetruck)   | 800,000    |
| 3 City of Eastpointe (38th district court)                        | 7,000,000  |
| 4 Westland (Fire department infrastructure)                       | 3,500,000  |
| 5 Livonia (Fire equipment)  | 1,000,000  |
| 6 City of Dearborn (Health and security infrastructure)           | 6,000,000  |
| 7 Jewish Federation (Security)                                    | 4,000,000  |
| 8 Macomb Community College Public Safety Institute                | 2,000,000  |
| 9 Northville Twp Fire Truck                                       | 1,500,000  |
| 10 Romulus Public Safety Building                                 | 1,000,000  |
| 11 Kalamazoo Twp police & fire infrastructure                     | 1,000,000  |
| 12 Oshtemo Twp Fire Station                                       | 1,000,000  |
| 13 Sterling Heights Police Command Vehicle                        | 750,000    |
| 14 Eaton County Fire Training Center                              | 700,000    |
| 15 Madison Heights Police Dept HVAC                               | 500,000    |
| 16 Utica Ambulance replacement                                    | 450,000    |
| 17 Utica Fire & EMT radios  | 300,000    |
| 18 Bloomfield Twp first responders & fire                         | 300,000    |
| 19 Grand Ledge Emergency Disaster relief                          | 250,000    |
| 20 Casco Twp (Allegan County) Firehouse Garage                    | 200,000    |
| 21 Utica Police Equipment   | 200,000    |
| 22 AmeriCorps Urban Safety Program/Detroit Youth Service Corps    | 100,000    |
| 23 Scio Twp Fire Truck  | 750,000    |
| <b>Pure Michigan</b>  | 14,000,000 |
| <b>1036 Reignite</b>  | 250,000    |
| <b>1037 Right of counsel</b>                                      | 1,500,000  |
| <b>1038 School psychologist programming</b>                       | 1,000,000  |
| <b>1039 SER metro</b>   | 750,000    |
| <b>1040 Short term loan grants</b>                                | 2,500,000  |
| <b>1041 Small business development</b>                            | 3,000,000  |
| <b>1042 Starfish</b>  | 2,000,000  |
| <b>1043 Symphony orchestra grants</b>                             | 5,250,000  |
| 1 Detroit symphony orchestra                                      | 750,000    |
| <b>1044 Talent and growth</b>                                     | 45,500,000 |
| <b>1045 Walkabouts multisensory movement-based learning</b>       | 500,000    |
| <b>1046 Wayne metro</b>   | 2,500,000  |
| <b>1047 Winter sports development (Luge)</b>                      | 1,500,000  |
| <b>1048 Women of tomorrow</b>                                     | 200,000    |
| <b>1009 Workforce development grants (AFL-CIO WDI)</b>            | 4,000,000  |
| <b>1049 Young adult well being and success (Discovery you)</b>    | 1,000,000  |
| <b>1050 Youth career development program (Starr commonwealth)</b> | 450,000    |

## Exhibit 2: Lansing State Journal: Major League Baseball Mandate Article



# Lansing State Journal

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LOCAL

## Major League Baseball mandated new grass for Lansing's baseball stadium. State legislators ponied up



**Mike Ellis**

Lansing State Journal

Published 7:30 p.m. ET June 30, 2024 | Updated 8:08 p.m. ET June 30, 2024

LANSING — The grass needs to be greener at Jackson Field, and the new state budget has a special allocation that is likely going help make that happen.

The turf upgrade is a Major League Baseball requirement for the minor league Lansing Lugnuts to be able to play in 2025, Tristan Wright, LEPPA's director, told city council members during a May committee meeting.

Major League Baseball officials directed requests for comment about Jackson Field's turf to the local team. Jesse Goldberg-Strassler, a Lugnuts spokesperson, said the turf was last replaced around the end of 2016.

Wright declined comment for this story, and LEPPA did not respond to a request for more information about the state appropriation.

The \$82.5 billion spending plan passed this week by the Legislature is awaiting Gov. Gretchen Whitmer's signature. It includes about \$400 million in pork, or earmarks for special projects, including about \$80 million for the three-county Lansing region. The \$1 million for "Lansing Lugnuts Infrastructure Improvements" is among those earmarks.

Lansing Mayor Andy Schor said the city-owned field where the minor league Lugnuts play is a treasure.

"This funding from the state will help cover costs, keep our baseball stadium in compliance with MLB regulations and maintain a safe and attractive-looking field," he said in a statement.

Jackson Field is the centerpiece of the city's Stadium District, surrounded by restaurants and upscale apartments, just a few blocks from the Michigan Capitol. Last year, nearly 333,000 people visited Jackson Field to watch the Lugnuts play, according to city officials.

Opened in 1996, the baseball stadium is operated by the Lansing Entertainment and Public Facilities Authority.

The city paid LEPPA a \$606,000 subsidy in 2023 for Jackson Field, which was greater than the stadium's expenses of \$473,455 that year, according to financial information from LEPPA.

**MORE:** From the Archives: Photos of the Lansing Lugnuts through the years

The stadium underwent a \$13.5 million renovation in 2015. That project, paid with city-issued bonds, included updated restrooms, team locker rooms, batting cages, fan seats, suites, picnic areas and playground equipment, concessions areas, stadium lighting, scoreboard, digital ribbon boards wrapping the suite deck, audio systems and signs.

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The team drew 332,971 fans in 2023. That's about 10% more than 2019 and 2% higher than 2022.

Councilmember Ryan Kost said an evening game can have fireworks, entertainment and is one of the best values for a night out with family or friends.

Same-day lawn admission is \$12 for adults, bleacher seats are \$15 and clubhouse seats are \$46, according to the box office website.

With the city's 2023 subsidy for Jackson Field being more than Jackson Field's operating expenses, that extra money is typically used for pricy long-term maintenance issues such as the turf and a necessary HVAC replacement for units that are nearly 30 years old, Kost said.

The stadium is needed, as an economic driver and community asset, but LEPFA needs to do more to bring more people into the stadium, Kost said.

The stadium hosts a number of non-baseball events, including Crosstown Showdown, Capital Clash, Beerfest at the Ballpark, the Michigan Legislative Softball Game, the Special Olympics Polar Plunge, the Olive Burger Festival, the Playmakers Fitness Foundation Michigan Mile and some concerts.

Kost said the stadium, when it was opened and he was young, held a wider variety of events. He said it could be used throughout the year for more community events, such as coordinating an ice hockey exhibition to coincide with the winter-kickoff Kringle Holiday Market in downtown or hosting more summer movie nights.

City council members have criticized LEPFA for using taxpayer money to stabilize the operations of Groesbeck Golf Course and the Lansing Center, a convention center, as well as the stadium. In May, to highlight their value rather than advocate for their sale, Councilmember Peter Spadafore tentatively proposed selling the three properties.

Jackson Field is the third name for the stadium.

It opened as Oldsmobile Park, a 15-year and \$1.5 million deal with General Motors, and then became the Cooley Law School Stadium for 11 years, starting in 2010, in a \$1.48 million deal. It was renamed Jackson Field in 2020, a seven-year deal with Jackson National Life Insurance.

LEPFA has made recent repairs at the stadium, according to officials. Those include:

Fall 2021: 27-year-old outfield lighting upgraded with LED lights that can be controlled in sections rather than as a whole, at a cost of \$650,000.

2021-2022: Locker room renovations to accommodate women in sports, no dollar figure provided.

Fall 2023: Extra batting tunnel added, outfield padding and anti-slip padding to dugout areas, \$1,200,000.

The Lugnuts home locker room area and weight room were expanded, no dollar figure provided.

Contact Mike Ellis at [mellis@lsj.com](mailto:mellis@lsj.com) or 517-267-0415



May 20, 2025

Clerk of the Court of Claims  
Hall of Justice  
925 W. Ottawa St.  
Lansing, MI 48909

RE: Written Claim per MCL 600.6431 against the Michigan Department of  
Labor and Economic Opportunity

Dear Clerk:

This verified letter is to fulfill the requirements of MCL 600.6431(1) as a written notice against the Department of Labor and Economic Opportunity by the Mackinac Center. The nature of the claim is a violation of the Constitution in the appropriation of two grants in the fiscal year 2024-25 general omnibus budget. These grants were made for impermissible local and/or private purposes under Const 1963, art 4, § 30. Plaintiff's claims arose upon the passage of 2024 PA 121, which was signed by the Governor on July 24, 2024.

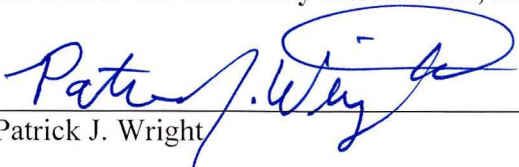
The Mackinac Center seeks an injunction against any distributions made related to these appropriations.

Sincerely,

/s/ Patrick J. Wright  
Mackinac Center for Public Policy  
Patrick J. Wright (P54052)  
140 West Main Street  
Midland, MI 48640  
(989) 631-0900  
[wright@mackinac.org](mailto:wright@mackinac.org)

**I declare that the statements above are true to the best of my information, knowledge, and belief.**

Dated: May 20, 2025

  
Patrick J. Wright

Subscribed and sworn to by Patrick J. Wright before me on the 20<sup>th</sup> day of May, 2025.

Signature 

STEPHEN DELIE  
Notary Public, State of Michigan  
County of Ingham  
My Commission Expires 07-29-2025  
Acting in the County of Midland

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Notary Public, State of Michigan  
County of Ingham  
My Commission Expires 07-29-2025  
Acting in the County of Midland

STATE OF MICHIGAN  
COURT OF CLAIMS

Bundle Cover Sheet

|  |                             |                           |
|--|-----------------------------|---------------------------|
| Lower Court:   | L Ct No.:                   | COC No.:<br>TEMP-CZZR1PL9 |
| Case Title:<br>MACKINAC CENTER FOR PUBLIC POLICY v. DEPARTMENT OF LABOR & ECON |                             |                           |
| Priority:<br>NONE  | Filing Option:<br>File Only |                           |

Filer Information

|  |  |
|--|--|
| <u>Filer</u><br>Patrick Wright<br>140 West Main Street<br>Midland, MI 48640<br><br>wright@mackinac.org | <u>Attorney</u><br>Patrick Wright, 54052(MI)<br>140 West Main Street<br>Midland, MI 48640<br><br>wright@mackinac.org |
|--|--|

Filing Summary

| Filing Type  | Filing Name  | Fee             |
|--|--|-----------------|
| Notice   | 2025.05.20 CoC Earmarks Notice Ltr (Final)                             | \$0.00          |
| Motion (filed with another document requiring a fee) | 2025.05.20 Earmarks Mtn to Exceed Page Limit (final)                   | \$0.00          |
| Motion (filed with another document requiring a fee) | 2025.05.20 Earmarks Mtn for PI (final)                                 | \$0.00          |
| Summons and Complaint                                | 2025.05.20 LEO Earmarks Summons and Complaint w exhibits (final) (003) | \$150.00        |
|  | eFiling System Fee:  | \$25.00         |
| Brief  | 2025.05.20 Earmarks PI Brief (final no exhibits)                       | \$0.00          |
| Brief  | 2025.05.20 Earmarks PI Brief (1st exhibits only)                       | \$0.00          |
| Brief  | 2025.05.20 Earmarks PI Brief (2nd exhibits only)                       | \$0.00          |
|  | NON-REFUNDABLE Automated Payment Service Fee:                          | \$5.25          |
|  | <b>Total:</b>  | <b>\$180.25</b> |

Alternate Payment Reason: None

The document(s) listed above were electronically filed with the Michigan Court of Claims.

TEMP-CZZR1PL9-48577208

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# TrueFiling Case Initiation - Summons and Complaint

**Case Title:**

MACKINAC CENTER FOR PUBLIC POLICY

**Case Type:**

MM

**Case Description:**

Constitutional Claims: All claims for money damages brought under the Michigan Constitution

## Party 1 (Plaintiff)

**Business:** Mackinac Center for Public Policy    **Phone:** (989) 631-0900

**Address:** 140 West Main Street

**City:** Midland    **State:** Michigan    **Zip:** 48640

Attorney(s) for Party 1

**Name:** Patrick James Wright    **Bar Number:** 54052    **(Lead Counsel)**

**Name:** Derk Arend Wilcox    **Bar Number:** 66177    **(Lead Counsel)**

**Name:** Stephen Antonie Delie    **Bar Number:** 80209    **(Lead Counsel)**

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## Party 2 (Defendant)

**Business:** Department of Labor & Economic Opportuni    **Phone:** (517) 241-6712

**Address:** 320 S. Walnut 6th Floor Elliot Larsen Building

**City:** Lansing    **State:** Michigan    **Zip:** 48933

**Party is Pro Se**

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