Complaint Against:

Gretchen Whitmer for Governor Committee Identification No. 518014 325 S. Walnut Lansing, MI 48933 Telephone No. 517.763.2955

Gretchen Whitmer 2520 Oxford Road Lansing, MI 48911

Complainant:

Eric Ventimiglia 123 W. Allegan, Suite 770 Lansing, MI 48933 Telephone No. 586.216.4940

Dated: July 26, 2021

Filed Pursuant to MCL 169.215 and the Administrative Rules of the Michigan Department of State Bureau of Elections Richard H. Austin Building, 1st Floor 430 W. Allegan Lansing, Michigan 48918

COMPLAINT

Complainant, Eric Ventimiglia, whose address is 123 W. Allegan, Suite 770, Lansing, MI 48933, Telephone: 586.216.4940, declares to the Michigan Secretary of State the following:

STATEMENT OF FACTS

- 1. Respondent Gretchen Whitmer ("Respondent Whitmer") is a candidate for Governor.
- 2. Respondent Gretchen Whitmer for Governor ("Respondent Whitmer Committee") is the candidate committee for Gretchen Whitmer.
- 3. On or about March 8, 2021, an aide to Respondent Whitmer's office contacted a representative of an aircraft owner to ask whether the aircraft owner had an aircraft that could fly Respondent Whitmer to Florida for a personal visit. See Attachment 1, Letter from Christopher M. Trebilcock, Counsel to Respondent Gretchen Whitmer for Governor and Michigan Transition 2019, to the Honorable Steve Johnson, Michigan House of Representatives Oversight Committee Chair at 2 (May 27, 2021) (hereinafter referred to as the "Trebilcock Letter").
- 4. After the request from Respondent Whitmer's staff, the aircraft owner then arranged for Respondent Whitmer to fly on its aircraft. On March 10, 2021, the aircraft owner was provided with an itinerary for the flight and arranged for a flight to depart on March 12, 2021 and return on March 15, 2021 (hereinafter referred to as the "Florida Excursion"). Trebilcock Letter at 2.
- 5. On March 12, Respondent Whitmer flew from Capital Region International Airport in Lansing, Michigan to Palm Beach International Airport in West Palm Beach, Florida. See Charlie LeDuff, Whitmer mooches billionaires' plane as father makes miraculous recovery, DEADLINE DETROIT (May 5, 2021); David Eggert, Gov. Whitmer won't discuss trip after reported use of private jet, The Associated Press (May 7, 2021); Whitmer visited father on plane shared by prominent GOP donors, The Detroit News, (May 6, 2021).
- 6. Upon information and belief, Respondent Whitmer did not inform Florida Department of Law Enforcement and/or the Palm Beach County Sherriff's Office of her four-day Florida Excursion, which would have been standard protocol if there were any sort of security concerns with her travel.
- 7. On March 15, Respondent Whitmer returned to Lansing on the same aircraft. Trebilcock Letter at 2. This private aircraft was a Gulfstream jet. See FAA Registry, N-Number Inquiry Results, N62AE (accessed July 18, 2021).
- 8. According to Respondent Whitmer's counsel, the only passengers on the flights were the Governor, her security detail, and her daughters. Trebilcock Letter at 2
- 9. There can be no dispute that Respondent Whitmer's Florida Excursion was a personal expense, unrelated to any campaign activity or official business:
- a. The exclusive purpose of the trip was to visit her father. See Paul Egan, Spokeswoman: Gov. Gretchen Whitmer traveled to visit her ill father, Richard Whitmer, DETROIT FREE PRESS (April

- 19, 2021); Craig Mauger, Whitmer traveled out if state to visit her father, THE DETROIT NEWS, (April 19, 2021).
- b. According to Respondent Whitmer's counsel, the Florida Excursion was for the purpose of "visit[ing] her father." Trebilcock Letter at 2.
- c. According to a May 12, 2021, article entitled "Gov. Whitmer: Flight to visit father was not 'a gift'" published in <u>The Detroit News</u>, Respondent Whitmer freely admitted the personal nature of the trip:

"When a family member of mine needs a little help, though, I'm going to show up."

"For anyone to be surprised that I have a family member who's been having a lot of health issues that I showed up to check in ... they're obviously not paying attention to who I am or what I do."

10. According to Respondent Whitmer's counsel, the value of these flights for the Florida Excursion was \$27,521. Trebilcock Letter at 2

NOW HERE IS WHERE THE FACTS GET INTERESTING FOR THE PURPOSES OF THIS COMPLAINT BECAUSE, SO FAR, THE FACTS ILLUSTRATE THAT RESPONDENT WHITMER TOOK A PURELY PERSONAL TRIP TO FLORIDA AFTER WARNING MICHIGANDERS NOT TO TAKE SIMILAR TRIPS. HYPOCRISY IS NOT A VIOLATION OF THE MICHIGAN CAMPAIGN FINANCE ACT; HOWEVER, FINANCING PERSONAL EXPENSES FROM A CANDIDATE COMMITTEE IS A VIOLATION.

- 11. According to Respondent Whitmer's counsel, the \$27,521 cost of these flights for the Florida Excursion was initially paid by Michigan Transition 2019, which is an entity organized under Section 501(c)(4) of the Internal Revenue Code. Trebilcock Letter at 2
- 12. The payment by Michigan Transition 2019 for the Florida Excursion prompted the undersigned Complainant to file a complaint with the Internal Revenue Service. See Craig Mauger, Conservative group files IRS complaint over Gov. Whitmer's flights, The Detroit News (May 19, 2021).
- 13. So now comes the about-face that triggers the filing of this Complaint -- according to Respondent Whitmer's counsel: "FAA rules do not allow the operator to accept any flight reimbursements except from a candidate campaign committee." Trebilcock Letter at 2-3. Michigan Transition 2019 is not a candidate committee; therefore, in order to avoid Respondent Whitmer from paying for her own personal expenses (and apparently complying with FAA rules), a candidate committee became the replacement payee here.
- 14. According to the July 2021 Campaign Statement of Respondent Whitmer Committee, this candidate committee paid \$27,521 on July 20, 2021 to PVS Chemicals for the Florida Excursion and received reimbursement of \$1710 on May 27, 2021 from Respondent Whitmer for what appears to be the Florida Excursion. See Attachment 2.

APPLICABLE STATUTORY AND ADMINISTRATIVE RULE PROVISIONS

- 1. MCL 169.221a(1):
- "(1) A candidate committee of a candidate who is elected or appointed to an elective office may make an expenditure for an incidental expense for the elective office to which that candidate was elected or appointed. Except as otherwise specifically provided in this act, an expenditure for an incidental expense by a candidate committee under this section is an expenditure under this act."
 - 2. MCL 169.209(1)(f):
- "(1) "Incidental expense" means an expenditure that is an ordinary and necessary expense, paid or incurred in carrying out the business of an elective office. Incidental expense includes, but is not limited to, any of the following:
- (f) An unreimbursed disbursement for travel, lodging, meals, or other expenses incurred by the public official, a member of the public official's immediate family, or a member of the public official's staff in carrying out the business of the elective office."
- 3. MCL 169.233(1). Campaign statements listing a committee's contributions and expenditures are required to be filed according to the schedules set forth in the Michigan Campaign Finance Act ("MCFA").
 - 4. MCL 169.233(10):
 - "(10) If a candidate, treasurer, or other individual designated as responsible for a committee's record keeping, report preparation, or report filing knowingly files an incomplete or inaccurate statement or report required by this section, that individual is subject to a civil fine of not more than \$1,000.00."
 - 5. MCL 169.233(9):
 - "(9) If a candidate is found guilty of a violation of this section, the circuit court for that county, on application by the attorney general or the prosecuting attorney of that county, may prohibit that candidate from assuming the duties of a public office or from receiving compensation from public funds, or both."
 - 6. MCL 169.215(15):
 - "(15) Unless otherwise specified in this act, a person who violates a provision of this act is subject to a civil fine of not more than \$1,000.00 for each violation. A civil fine is in addition to, but not limited by, a criminal penalty prescribed by this act."

7. Administrative Rule 169.63:

"R 169.63 Unauthorized disbursement.

- Rule 63. (1) An officeholder's expense fund report shall include information which is sufficient to establish that each disbursement from the fund was for the payment of an expense incidental to the elected public official's office.
- (2) If, upon examination of a report, the secretary of state is unable to determine whether a disbursement from an officeholder's expense fund was made in compliance with the act and these rules, the secretary of state shall request additional information or documentation which is sufficient to establish that the disbursement was for an expense incidental to office.
- (3) If the secretary of state determines, after receiving the information or documentation required under subrule (2) of this rule, that a disbursement from an officeholder's expense fund was not made in compliance with the act and these rules, the secretary of state shall request the public official to reimburse an amount equivalent to the unauthorized disbursement to the officeholder's expense fund.
- (4) If a public official fails to respond within 21 days to a request made under subrule (2) or (3) of this rule, the secretary of state shall refer the matter to the attorney general for commencement of an action to recover the unauthorized disbursement from the officeholder's expense fund. A referral made under this subrule shall not prevent the secretary of state from proceeding under part 5 of these rules."

NOTE: Although officeholder expense funds, to which this administrative rule relates, were repealed by 1999 PA 224, these administrative rules are utilized in the analysis of incidental expenses. See, for example, Michigan Attorney General Opinion No. 7240 (December 15, 2009).

ISSUE PRESENTED

WHETHER THE PAYMENT BY RESPONDENT WHITMER COMMITTEE FOR THE PERSONAL TRAVEL EXPENSES OF RESPONDENT WHITMER QUALIFIES AS AN "INCIDENTAL EXPENSE" PURSUANT TO MCL 169.209(1)(F) OF THE MCFA?

<u>ANALYSIS</u>

1. RESPONDENT WHITMER'S PERSONAL TRIP CANNOT POSSIBLY QUALIFY AS AN "INCIDENTAL EXPENSE" PURSUANT TO MCL 169.209(1)(F) OF THE MCFA

MCL 169.209(1)(f) provides:

"(1) "Incidental expense" means an expenditure that is an ordinary and necessary expense, paid or incurred in carrying out the business of an elective office. Incidental expense includes, but is not limited to, any of the following:

.

(f) An unreimbursed disbursement for travel, lodging, meals, or other expenses incurred by the public official, a member of the public official's immediate family, or a member of the public official's staff in carrying out the business of the elective office." (Emphasis supplied)

According to the Michigan Department of State:

"To determine whether a disbursement is a personal expense, the Department applies a "but-for" test in order to determine whether the expenditure may be personal in nature: If the disbursement would have occurred irrespective of the individual's status as a candidate or an office holder, the expenditure is a prohibited personal expense."

"The burden is on the committee at the time of filing a campaign statement to demonstrate that the disbursement would not have been made but for the candidate's status as an officeholder."

Interpretative Statement issued to Kevin Hertel dated April 15, 2021.

Similarly:

"Expenses ... that originate from personal activity unrelated to performing the functions of the public official's office will not so qualify [as an incidental expense under the MCFA]." Michigan Attorney General Opinion No. 7240 (December 15, 2009).

Consequently, in order for Florida Excursion to qualify as an "incidental expense", the purpose of this trip <u>must</u> be to <u>carry out the business of the elective office</u>. MCL 169.209(1)(f). However, as the "Statement of Facts" section of this Complaint clearly demonstrates, the Respondents readily admit that the purpose of the Florida Excursion was purely personal and had nothing to do with carrying out the business of the Office of Governor. Because the Florida Excursion had nothing to do with carrying out the business of the Office of Governor, the "disbursement would have occurred irrespective of the individual's status as a candidate or an office holder" and most certainly did "originate from personal activity unrelated to performing the functions of the public official's office". Therefore, Respondent Whitmer's personal trip cannot possibly qualify as an "incidental expense" pursuant to MCL 169.209(1)(f) of the MCFA.

2. ANY ATTEMPT TO JUSTIFY PAYMENT OF A PERSONAL EXPENSE BY A CANDIDATE COMMITTEE BASED ON SELF-ASSERTED SECURITY REASONS NECESSARILY FAILS

If the Respondents are allowed to qualify a purely personal trip as an "incidental expense", then the prohibition against the payment by a candidate committee of a candidate's personal expenses becomes meaningless. Under the Respondents' theory as argued by Respondent Whitmer's Counsel, the \$27,521 cost of the Florida Excursion is an "incidental expense" because:

"But for her elected office, the Governor would not have incurred the security expenses for travel to see her ailing father on short notice." Trebilcock Letter at 3.

However, if this argument made any sense, then why stop at trips to West Pam Beach, Florida? What would prevent Respondent Whitmer from chartering flights for personal trips to Disneyworld, the Bahamas, Hawaii, etc.? To be sure, the Respondents have not stumbled upon some clever loophole in the MCFA which somehow allows a candidate committee to finance personal expenses. Rather, the use of Respondent Whitmer Committee to finance the Florida Excursion is simply a knee-jerk reaction when Respondent Whitmer was advised that Michigan Transition 2019, the initial payee of the Florida Excursion, could not finance the Florida Excursion because "FAA rules do not allow the operator to accept any flight reimbursements except from a candidate campaign committee." Trebilcock Letter at 2-3. Again, the "burden is on the committee at the time of filing a campaign statement to demonstrate that the disbursement would not have been made but for the candidate's status as an officeholder." Interpretative Statement issued to Kevin Hertel dated April 15, 2021. Respondent Whitmer's decision to visit her father has nothing to do with the business of the Office of Governor.

3. RESPONDENT WHITMER'S PAYMENT OF \$1710 TO RESPONDENT WHITMER COMMITTEE REPRESENTS AN ADMISSION THAT THE COST OF THE FLORIDA EXCURSION IS NOT AN "INCIDENTAL EXPENSE"

Respondent Whitmer reimbursed \$1710 to Respondent Whitmer Committee on May 27, 2021. See Attachment 2. Why? If the cost of the Florida Excursion is truly an "incidental expense", then no reimbursement would be necessary. The cost of the Florida Excursion is either an "incidental expense" or it is not. Stated differently, if any portion of the Florida Excursion is a personal expense, then the entire cost of the Florida Excursion is a personal expense. This reimbursement is a fatal admission here.

CONCLUSION

Based on the foregoing, Respondent Whitmer and Respondent Whitmer Committee, by knowingly and illegally financing the cost of the Florida Excursion through a candidate committee, at a minimum, have violated the following Sections of the MCFA:

- a. Section 21a by illegally using candidate committee funds to finance a candidate's personal expenses in the guise of an "incidental expense".
- b. Section 33 by knowingly filing an inaccurate statement or report.

The penalties for the Respondents' MCFA violations are as follows:

- 1. For violating Section 33:
 - a. If a candidate is found guilty of a violation of Section 33, the circuit court for that county, on application by the attorney general or the prosecuting attorney of that county, may prohibit that candidate from assuming the duties of a public office or from receiving compensation from public funds, or both.

- b. If a candidate, treasurer, or other individual designated as responsible for a committee's record keeping, report preparation, or report filing knowingly files an incomplete or inaccurate statement or report required by Section 33, that individual is subject to a civil fine of not more than \$1,000.
- 2. For violating MCL 169.221a, a civil fine of not more than \$1,000. MCL 169.215(15).
- 3. For violating MCL 169.221a and pursuant to Administrative Rule 63, the public official is required to reimburse an amount equivalent to the unauthorized disbursement to the candidate committee.

REQUEST FOR ACTION BY THE SECRETARY OF STATE

This Complaint demonstrates greed in its purest form, and serves as yet another illustration of Respondent Whitmer's "the rules apply to thee, but not to me" attitude. The MCFA simply does not allow a candidate committee to finance the personal expenses of a candidate. Moreover, because Respondent Whitmer participated in this illegal scheme, then, in addition to other penalties:

- a. Respondent Whitmer may be prohibited from assuming the duties of a public office or from receiving compensation from public funds, or both (MCL 169.233(9)); and
- b. Respondent Whitmer must be forced to reimburse the unauthorized disbursement to Respondent Whitmer Committee as indicated in Administrative Rule 63; otherwise, the Michigan Attorney should commence an action to recover the unauthorized disbursement as indicated in Administrative Rule 63.

Accordingly, the Complainant respectfully requests that the Secretary of State immediately investigate the numerous violations set forth in this Complaint and determine that the Respondents have violated numerous sections of the Michigan Campaign Finance Act and to assess all appropriate penalties.

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

Respectfully submitted.

Dated: July 26, 2021

Eric Ventimiglia

Attachment 1

Letter from Christopher M. Trebilcock, Counsel to Respondent Gretchen Whitmer for Governor (May 27, 2021)



Christopher M. Trebilcock T (313) 965-8575 F +13133096910 Email:ctrebilcock@ClarkHill.com Clark Hill PLC 500 Woodward Ave., Suite 3500 Detroit, MI 48226 T (313) 965-8300 F (313) 965-8252

May 27, 2021

Hon. Steve Johnson Michigan House of Representatives House Oversight Committee Chair State Capitol P.O. Box 30014 Lansing, MI 48909

Dear Chair Johnson:

I serve as legal counsel to the Whitmer for Governor candidate committee and Michigan Transition 2019. I am in receipt of your May 22, 2021 letter addressed to Governor Gretchen Whitmer. As the majority of your questions relate to the activities of my clients, I will respond to your inquiries. In addition, I want to set the record straight on issues related to payment for the Governor's March 2021 trip.

Michigan Transition 2019 is organized as a Michigan nonprofit corporation. It is recognized as a tax-exempt social welfare organization under Internal Revenue Code Section 501(c)(4). It also has registered assumed names of "Michigan Inaugural 2019" and "Executive Office Account." Contributions to Michigan Transition 2019 are not deductible as charitable contributions. Thus, any expenditures from Michigan Transition 2019 have not been subsidized by charitable contributions.

Article II of the Articles of Incorporation of Michigan Transition 2019 describe the purposes for which it is established. Those purposes relevant to the current situation include:

- To operate for the promotion of civic action and social welfare by promoting the common good and general welfare of the residents of, and visitors to, the State of Michigan.
- To educate legislators, state officers, and the general public on issues facing Michigan and the United States.
- To advocate citizen participation and obtain support for public policies in Michigan.

The exempt activities of Michigan Transition 2019 are not limited to its original purpose of supporting the transition of Governor Whitmer and her inaugural ceremony. As such, the

expenditures made by Michigan Transition 2019 since its inception were made consistently with its purposes by, in many cases, lessening the use of taxpayers' dollars and the burden of government. This includes expenses for travel, staff, food, postage, and research when those activities are related to the exempt activities of Michigan Transition 2019.

In addition, let me share several facts and the timeline for Governor Whitmer's trip to visit her father. On or around March 8, 2021, an aide to Governor Whitmer's office contacted PVS to ask whether PVS had an aircraft that could fly her on a trip to Florida. The rationale for securing a non-commercial flight was security, as Governor Whitmer has been the subject of extraordinary threats to her life. As you are aware, right now more than a dozen militia members are being prosecuted in state and federal court based on an alleged attempt to kidnap and likely kill the governor. PVS responded to the outreach the next day and indicated that it did have an aircraft. On March 10, 2021, PVS was provided with an itinerary for the flight and arranged for a flight to depart on March 12 and return on March 15, 2021.

As stated by the Governor's office, this was a two-day weekend trip to visit her ailing father, with a travel day on each side of the visit. I have been informed that leading up to and prior to this trip, the Michigan State Police adhered to all protocols at all times during this trip. The Governor's office has also indicated that during the trip, the Governor followed all MDHHS epidemic orders. Michigan has not had any limitations on travel for nearly a year. Although I cannot speak for the Governor's office, my understanding is that the State does not provide details regarding security for the Governor, especially given the very real and ever-present threats to her life.

That said, the Governor and her security detail were on the flight to visit her father. The return flight included her daughters who had been helping manage her father's health issues for several weeks while maintaining their college and high school virtual schedules. No other people were on the flights besides the Governor, her children on the return flight, her security detail, and the flight crew.

On March 19, 2021, an aide to Governor Whitmer's office contacted PVS to determine the cost of the flight. PVS responded to the request but did not issue an invoice or request payment at that time. The value of the flight was \$27,521. PVS later received payment in the amount of \$27,521.00 (the "Payment") from Michigan Transition 2019.

At the time the Payment was issued, both PVS and Michigan Transition 2019 believed that the Payment was being made in compliance with all applicable laws. PVS assumed that the Payment was made pursuant to 14 C.F.R. § 91.321 (Carriage of Candidates in Elections). Under federal tax laws and state nonprofit law, Michigan Transition 2019 may pay expenses related to the carrying out of its exempt purposes. It was determined that the expense of the non-commercial flight was reasonable and necessary given the serious and varied threats to the personal safety of the Governor as advised by security experts. Only because of media reports on these issues did PVS and Michigan Transition 2019 learn that a miscommunication occurred between them with respect to the source of the payment for the flight.

Notwithstanding that the payment of the trip was a proper expense of Michigan Transition 2019 under tax and nonprofit law, legal counsel for PVS advised Michigan Transition 2019 on May 17 that because of PVS' status as a Part 91 operator, FAA rules do not allow the operator to

accept any flight reimbursements except from a candidate campaign committee. Based on this new understanding, the cost of the flight will now be paid from the Whitmer for Governor campaign fund consistent with FAA rules. Although not required by law, the Governor is also voluntarily reimbursing the Whitmer for Governor candidate committee for an amount equivalent to the cost of a first-class commercial airline ticket for herself and her daughters.

Payment for the flight by the Whitmer for Governor candidate committee is also permissible under the Michigan Campaign Finance Act. MCL 169.209 permits candidate committees to make expenditures for incidental expenses "paid or incurred in carrying out the business of an elective office." Under the law, these expenses include but are not limited to "unreimbursed [expenses] for travel, lodging, meals, or other expenses incurred by the public official, a member of the public official's immediate family, or a member of the public official's staff in carrying out the business of the elective office."

As you know, the threats against the Governor's life are well-documented. Commercial flights were deemed not reasonable for security reasons at that time. Moreover, as the Governor's office has stated, while outside the state the Governor maintained her official schedule and conducted scheduled meetings. The payment for the additional security costs by an entity other than the State lessened the burden on taxpayers. But for her elected office, the Governor would not have incurred the security expenses for travel to see her ailing father on short notice. This legal conclusion is consistent with MCL 169.209 and the April 15, 2021 interpretive statement of the Secretary of State's office to Representative Kevin Hertel, which confirmed that security expenses necessary to protect the health and welfare of an elected official that would not otherwise have been incurred but for the person's status as an elected official can be considered a necessary and reasonable expense under the Michigan Campaign Finance Act.

We understand that PVS is still working with the FAA to address its questions related to these issues. Once we are informed by PVS that the FAA has resolved its inquiry, the Whitmer for Governor candidate committee will issue a check to PVS. The July 2021 campaign finance report of the Whitmer for Governor candidate committee will reflect this transaction in compliance with the Michigan Campaign Finance Act.

You also raised questions regarding Governor Whitmer's travel in January 2021 to Washington, D.C. to attend the Inauguration of President Biden, an event for which the Governor served as co-chair. Again, the Governor's travel was compliant with applicable law. Although it could have been, the cost of the flight was not borne by the taxpayers of Michigan.

Governor Whitmer travelled on a non-commercial plane operated by Solomon Plumbing Co. on January 19 and January 21, 2021. The value of the flight was \$22,670. The plane is operated under Part 91 of the FAA regulations. For the reasons discussed above, and even though the trip was in furtherance of the Governor's official duties, the Whitmer for Governor campaign committee issued a check for the value of the flight. In compliance with the Michigan Campaign Finance Act, this transaction will be reported on the July 2021 report for the Whitmer for Governor candidate committee.

Finally, the Governor's March 2021 trip has drawn significant attention the last several weeks. Responses to questions were based on the information and understanding my clients or I had at each point in time. As additional information was shared or learned, we sought to provide

additional clarity. Ensuring the Governor's security, while lessening any burden on taxpayers, has always been our top priority.

Thank you for your attention to these matters.

Sincerely,

CLARK HILL PLC

Christopher M. Trebilcock

Attachment 2

Selected transactions reported in July 2021 Quarterly Campaign Statement filed by Respondent Gretchen Whitmer for Governor (July 26, 2021)

GRETCHEN WHITMER FOR GOVERNOR

518014-GUB

DIRECT GRETCHEN WHITMER

2520 OXFORD RD LANSING MI 48911-1035

GOVERNOR-STATE OF MICHIGAN

05/27/21 \$1,710.00

Committee Making Expenditure	Committee ID-Type	Schedule Type	Payee	Expense Date	Exp Code	Purpose	Amount o
		SUPP	SIDNEY HOLLINGSWORTH 325 S WALNUT ST LANSING, MI 48933-2013	03/31/2021			\$1,600.6
		SUPP	GABRIELLE MERDITAJ 325 S WALNUT ST LANSING, MI 48933-2013	03/31/2021			\$707.54
GRETCHEN WHITMER FOR GOVERNOR	518014–GUB	DIRECT	RUN THE WORLD PO BOX 8708 MADISON, WI 53708-8708	06/07/2021		FUNDRAISING CONTRACTOR	\$31,545.0
GRETCHEN WHITMER FOR GOVERNOR	518014-GUB	DIRECT	RUN THE WORLD PO BOX 8708 MADISON, WI 53708-8708	06/02/2021		FUNDRAISING CONTRACTOR	\$30,000.0
GRETCHEN WHITMER FOR GOVERNOR	518014–GUB	DIRECT	RUN THE WORLD PO BOX 8708 MADISON, WI 53708-8708	03/19/2021		FUNDRAISING CONTRACTOR	\$27,648.0
GRETCHEN WHITMER FOR GOVERNOR	518014-GUB	DIRECT	PVS CHEMICALS 10900 HARPER AVE DETROIT, MI 48213-3364	07/20/2021		FLIGHT	\$27,521.0
GRETCHEN WHITMER FOR GOVERNOR	518014-GUB	DIRECT	RUN THE WORLD PO BOX 8708 MADISON, WI 53708-8708	06/30/2021		FUNDRAISING CONTRACTOR	\$27,000.0
GRETCHEN WHITMER FOR GOVERNOR	518014–GUB	DIRECT	RUN THE WORLD PO BOX 8708 MADISON, WI 53708-8708	06/07/2021		FUNDRAISING CONTRACTOR	\$26,400.0
GRETCHEN WHITMER FOR GOVERNOR	518014-GUB	DIRECT	DKYEMA 400 RENAISSANCE CTR DETROIT, MI 48243-1607	01/11/2021		LEGAL SERVICES	\$25,039.6
GRETCHEN WHITMER FOR GOVERNOR	518014-GUB	DIRECT	SOLOMON PLUMBING 29665 WK SMITH DR STE A NEW HUDSON, MI 48165-8581	05/26/2021		FLIGHT	\$22,670.0
GRETCHEN WHITMER FOR GOVERNOR	518014-GUB	DIRECT	DNC TRAVEL OFFSET ACCOUNT 430 S CAPITOL ST SE WASHINGTON, DC 20003-4024	06/25/2021		VP HARRIS TRAVEL	\$19,656.0
GRETCHEN WHITMER FOR GOVERNOR	518014-GUB	DIRECT	PAYCHEX 29065 CABOT DR STE 100 NOVI, MI 48377-3034	06/30/2021		TAXES	\$17,801.8
GRETCHEN WHITMER FOR GOVERNOR	518014-GUB	DIRECT	PAYCHEX 29065 CABOT DR STE 100 NOVI, MI 48377-3034	05/28/2021		TAXES	\$15,527.0
GRETCHEN WHITMER FOR GOVERNOR	518014–GUB	DIRECT	PAYCHEX 29065 CABOT DR STE 100 NOVI, MI 48377-3034	04/30/2021		TAXES	\$15,104.9
GRETCHEN WHITMER FOR GOVERNOR	518014–GUB	DIRECT	EMILY'S LIST-NF FUND 1800 M ST NW STE 375N WASHINGTON, DC 20036-5862	06/11/2021		POSTAGE COST	\$12,595.8
GRETCHEN WHITMER FOR GOVERNOR	518014-GUB	DIRECT	EMILY'S LIST-NF FUND 1800 M ST NW STE 375N WASHINGTON, DC 20036-5862	05/06/2021		POSTAGE COST	\$12,514.5