

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

MATT MADDOCK,

Plaintiff,

v.

THE MICHIGAN HOUSE OF REPRESENTATIVES;  
THE MICHIGAN HOUSE OF REPRESENTATIVES'  
BUSINESS OFFICE; TABBATHA BIRMINGHAM,  
in her official and personal capacities; JOSEPH TATE,  
in his official capacity as The Speaker of the House for  
the State of Michigan, and in his personal capacity;  
DOUGLAS SIMON in his official capacity as Director  
of the House Business office and in his personal  
capacity; LISA CURTIS, deputy director of Michigan  
House Business office, in her personal and official  
capacities; and AMBER MCCANN, Press Secretary  
for Speaker of the House, in her personal and official  
capacities,

Defendants.

Case No. \_\_\_\_\_

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

**VERIFIED COMPLAINT**

Above all else, the First Amendment means that government has no power to restrict expression because of its message, its ideas, its subject matter, or its content.<sup>1</sup> However, the Defendants in this case seem to disagree. They believe that it is a proper function of government to restrict political speech on the basis of content and viewpoint.

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<sup>1</sup> *Police Dep't of Chi. v. Mosley*, 408 U.S. 92, 95 (1972) (citing *Cohen v. California*, 403 U.S. 15, 24 (1971); *Street v. New York*, 394 U.S. 576 (1969); *New York Times Co. v. Sullivan*, 376 U.S. 254, 269-270 (1964), and cases cited; *NAACP v. Button*, 371 U.S. 415, 445 (1963); *Wood v. Georgia*, 370 U.S. 375, 388-389 (1962); *Terminiello v. Chicago*, 337 U.S. 1, 4 (1949); *De Jonge v. Oregon*, 299 U.S. 353, 365 (1937)).

Michigan House of Representatives members are afforded the right to print newsletters for their constituents. This printing and mailing right is, however, contingent upon the newsletters being pre-approved by the House Business Office. That Office acts the part of state censor, and decides whether or not the content is acceptable. If it is not, then the newsletter will not be printed until the House Business Office is satisfied that it meets their requirements.

Some of their requirements are reasonable. For example, the rules prohibit using printing rights for personal use or for purposes that do not relate to the work of the legislature. However, the majority of the rules are so scorchingly unconstitutional that they must be struck down. For example, the rules prohibit legislators from publishing a newsletter if that newsletter criticizes the legislature, legislators, or other individuals, including the governor. In other words, the government prohibits publishing comments critical of the government. Lady Liberty weeps at the thought of it, and she will not be consoled until this abuse of the First Amendment ends.

### **THE PARTIES**

1. Plaintiff Matt Maddock is an elected member of the Michigan House of Representatives.
2. Defendant Tabbatha Birmingham is an Administrative Assistant in the House of Representatives Business Office, and is sued in her official and personal capacities.
3. Defendant the Michigan House of Representatives Business Office is organized by the Michigan House of Representatives, which is also sued here.
4. Defendant Joseph Tate is the Speaker of the House for the State of Michigan and is sued in his official and personal capacities.
5. Defendant Douglas Simon is the Director of the House of Representatives Business Office and is sued in his official and personal capacities.

6. Defendant Lisa Curtis is the Deputy Director of the House of Representatives Business Office and is sued in her personal and official capacities.

7. Defendant Amber McCann is the Press Secretary for Defendant Tate and is sued in her personal and official capacities.

### **JURISDICTION AND VENUE**

8. This Court possesses subject matter over the action pursuant to 28 U.S.C. § 1331 as this is a civil action arising under 42 U.S.C. § 1983. This Court possesses supplemental jurisdiction over the related claims arising under state law per 28 U.S.C. § 1367.

9. This Court possesses general personal jurisdiction over all Defendants as they are all residents and citizens of the State of Michigan or organized under the laws of the State of Michigan with a principal place of business therein.

10. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b)(1) and (2) as one or more defendants resides in this District and a substantial part of the events and omissions giving rise to this action occurred in this District.

### **FACTUAL BACKGROUND**

#### **A. Structural Framework for House Member Printing**

11. Article IV, §§ 1 & 3 of the Michigan Constitution create a House of Representatives for the State of Michigan.

12. Art. IV, § 15, creates a Legislative Council which, among other things, authorizes services to be provided for the members of the legislature.

13. The Legislative Council of the Michigan Legislature first adopted certain Printing Rules on May 15, 1997, which have since been amended.

14. Rule 6 of the Legislative Council Printing Rules (“Printing Rules”) says:

The Legislative Service Bureau's printing and mailing equipment shall be used for official legislative business only. Official legislative business is deemed to include all issues of statewide interest or of general interest to an entire legislative district. **The use of legislative equipment for the printing of personal or partisan material of any nature for a legislator is strictly prohibited.** The text of printing requests for members of the House shall be reviewed under procedures authorized by the Speaker of the House and the text of printing requests from members of the Senate shall be reviewed under procedures authorized by the Senate Majority Leader. Only printing the Bureau's equipment is capable of producing will be printed. **Some examples of specific references in legislative printings which are prohibited are** requests to vote for or against someone or some concept, solicitations of money for any purpose, or **negative comments about the institution of the legislature or a specific legislator.**

(emphasis added). See **Exhibit 1**.

15. The Michigan House Administration/Business Office, under procedures authorized by the Speaker of the House (Defendant Tate), promulgated the House of Representatives' Printing Guidelines, Rules and Procedures ("Printing Guidelines").

16. At all relevant times herein, Defendants Simon and Curtis, under the supervision of Defendant Tate, who acts by and through his Press Secretary, Defendant McCann, as well as through Defendant Birmingham, enforced and implemented the Printing Rules and Printing Guidelines.

17. Rule 3 of those Printing Guidelines reads, in relevant part:

3. The House Duplicating Center's and Legislative Service Bureau's printing and mailing equipment shall be used for official legislative business only. Only printing the HDC's or LSB's equipment is capable of producing will be printed. Official legislative business is deemed to include all issues of statewide interest or of general interest to an entire legislative district. The use of legislative equipment for the printing of personal or partisan material of any nature for a legislator is strictly prohibited. Examples of prohibited printed or electronic material include, but are not limited to:

...

g. Comments critical of the institution of the legislature, legislators or other individuals.

h. Impugn motives of legislators or other individuals, or accusations of intentional misrepresentation.

af. Issues intending to influence pending court cases. Issues related to a pending court case unless the issue is directly before the state legislature.

18. Neither the Printing Rules nor Printing Guidelines define what is “partisan,” though both prohibit the printing of “partisan” material.

19. While one might think that, since Art. IV, § 15 designates the Legislative Council as “bi-partisan,” the term “partisan” should simply mean that which is related to the Democratic and Republican parties, the examples used in the Printing Rules and Printing Guidelines go beyond references to the two parties.

20. Although the Printing Rules and Printing Guidelines have been in place for some time, each speaker of the house is authorized to enact rules for the House Business Office, and Defendant Tate has re-authorized these unconstitutional rules and guidelines and uses the power of the Speaker’s Office to enforce them.

21. Both the Printing Rules and Printing Guidelines are viewpoint-based restrictions; they prohibit negative and critical comments, but allow positive and laudatory comments about the legislature, legislators, and other individuals.

22. Similarly, the Printing Guidelines prohibit impugning motives, but allow one to approve of someone’s motives, and they prohibit asserting one is making an intentional misrepresentation, but allow one to assert someone is telling the truth.

**B. Plaintiff Suffers an Unconstitutional Rejection of a Request to Print**

23. Plaintiff, Matt Maddock, has represented the 51st House District since 2019.

24. As an elected member of the Michigan House of Representatives, Maddock produces and prints newsletters to distribute to the public, through the Michigan House of Representatives’ Business Office, consistent with the Printing Rules and Printing Guidelines.

25. However, prior to publishing any such newsletter, the content of the newsletter

must be submitted to the House Business Office, which reviews such under Rule 6 of the Printing Rules and Rule 3 of the Printing Guidelines.

26. In February 2024, Plaintiff sought to publish a newsletter.

27. Joseph Foley, Plaintiff's legislative aide, was advised that such required pre-approval prior to publication.

28. Thus, on February 14, 2024, Foley transmitted a draft of the newsletter to Defendant Birmingham.

29. A true and correct copy of that draft newsletter is filed herewith as **Exhibit 2**.

30. While Plaintiff and his team understood that the newsletter might need to be revised to comply with content-neutral formatting requirements, they were shocked and surprised by the response, as any American would be.

31. Birmingham responded that the newsletter violated "multiple portions of the printing guidelines," including Rule 3(g) & (h), and approval to print the newsletter was denied.

32. Birmingham included a copy of the Printing Guidelines in her response.

33. **Exhibit 3** is a true and correct copy of the response from Birmingham.

34. Thereafter, a different legislative aide for Plaintiff, Rachel Atwood, requested that Birmingham identify which portion of the proposed newsletter violated which rule.

35. Birmingham responded with a copy of the rules and with the alleged violations identified highlighted and annotated.

36. **Exhibit 4** is a true and correct copy of this second response from Birmingham.

37. One set of alleged violations of the Printing Guidelines was the use of Governor Whitmer's and Speaker Tate's names associated with criticism.

38. Another set of violations was highlighted for violating Rules 3(g) & (h).<sup>2</sup>

39. Each one of the highlighted portions was a critique of a state official or institution.

40. Birmingham did not deem the favorable invocation of Jesus Christ, by name, to violate the rules.

41. A reasonable person reading the draft newsletter would note its stark parallels with the Declaration of Independence. In fact, it was based upon that document.

42. If the aforementioned Printing Rules and Printing Guidelines were held unenforceable and Defendants enjoined from the enforcement thereof, Plaintiff would seek to publish his newsletter. These unconstitutional rules are the only impediment to the Plaintiff engaging in this constitutionally protected expression.

43. As a result of the aforementioned Printing Rules and Printing Guidelines, the residents of the 51st House District have been denied the ability to receive information from their duly-elected representative.

44. As a result of the aforementioned Printing Rules and Printing Guidelines and Defendants' actions in furtherance thereof, Plaintiff has suffered at least nominal damages, and otherwise suffered emotional distress, injury to reputation, and incurred legal fees.

### **CLAIMS FOR RELIEF**

#### **Count I**

#### **Violation of the First Amendment to the United States Constitution (42 U.S.C. 1983 – First Amendment)**

45. Plaintiff realleges each allegation in the preceding paragraphs.

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<sup>2</sup> One other purported violation, a reference to *Missouri v. Biden*, was deemed to violate Rule 3(af), which prohibits “Issues intending to influence pending court cases. Issues related to a pending court case unless the issue is directly before the state legislature.” Plaintiff is challenging Rule 3(af) as being applied in an unconstitutionally overbroad manner.

46. Printing Rule 6’s prohibition against the publication of “partisan material,” including the selective prohibition against “negative comments about the institution of the legislature or a specific legislator” violates the First Amendment of the U.S. Constitution, made applicable to the state pursuant to the Fourteenth Amendment.

47. Printing Guideline Rule 3(g) & (h)’s prohibition against the publication of “partisan material,” including the selective prohibition against “comments critical of the institution of the legislature, legislators or other individuals” or that “impugn motives of legislators or other individuals, or accusations of intentional misrepresentation” violates the First Amendment of the U.S. Constitution, made applicable to the state pursuant to the Fourteenth Amendment.

48. The Rule 3(af) prohibition on discussing court cases is unconstitutional. There is no reason to restrain Representatives from talking about court cases, at all, but even if the prohibition on speaking about court cases is upheld facially, it is unconstitutional as applied. This prohibition restrained Plaintiff from discussing the unconstitutional actions taken by a sitting president, and would prohibit discussing any case that could even be implicated on appeal, if the way it is applied is upheld. For example, as there are challenges to *NYT v. Sullivan* percolating from time to time, even discussing that landmark case could be prohibited. Merely discussing a pending Supreme Court case should not be prohibited.

49. Defendants’ restriction on Plaintiff’s speech is content-based and viewpoint discriminatory and is in violation of the Free Speech Clause of the First Amendment and the Right to Petition the Government Clause of the First Amendment.

50. Defendants’ individual acts to enforce Printing Rule 6 and Printing Guideline Rule 3(g), 3(h), and 3(af) are a prior restraint on speech and violates Plaintiff’s First Amendment rights to freedom of speech and expression, and freedom of petition.



51. It is clearly established that a viewpoint based prior restraint on the publication of lawful speech violates the First Amendment.

52. Plaintiff may recover damages, including, but not limited to, nominal damages, along with obtaining declaratory and injunctive relief against Defendants, including the natural person defendants individually and in their official capacities, for the deprivation of his rights per 42 U.S.C. § 1983.

53. Plaintiff intends to publish the newsletter upon the issuance of the injunctive and declaratory relief. Plaintiff, therefore, requires a declaration that such publication was lawful and an injunction against Defendants from refusing to publish the newsletter and from enforcing Printing Rule 6 and Printing Guidelines Rule 3(g), 3(h), and 3(af).

**Count II**  
**Violation of the Article I, Section 3 and Section 5  
of the Michigan Constitution**

54. Plaintiff realleges each allegation in the preceding paragraphs.

55. Printing Rule 6's prohibition against the publication of "partisan material," including the selective prohibition against "negative comments about the institution of the legislature or a specific legislator" violates Article I, §§ 3 & 5 of the Michigan Constitution.

56. Printing Guideline Rule 3(g), 3(h), & 3(af)'s prohibition against the publication of "partisan material," including the selective prohibition against "comments critical of the institution of the legislature, legislators or other individuals" or that "impugn motives of legislators or other individuals, or accusations of intentional misrepresentation," and prohibiting any discussing of court cases, violates Article I, §§ 3 & 5 of the Michigan Constitution.

57. Defendants' restriction on Plaintiff's speech is content-based and viewpoint discriminatory and is in violation of Article I, §§ 3 & 5 of the Michigan Constitution.

58. Defendants' individual acts to enforce Printing Rule 6 and Printing Guideline Rule 3(g), 3(h), & 3(af) are a prior restraint on speech and violates Article I, §§ 3 & 5 of the Michigan Constitution.

59. It is clearly established that a viewpoint based prior restraint on the publication of lawful speech violates Article I, §§ 3 & 5 of the Michigan Constitution.

60. Plaintiff may recover damages, including, but not limited to, nominal damages, along with obtaining declaratory and injunctive relief against Defendants, including the natural person defendants individually and in their official capacities, for the deprivation of his rights per Article I, §§ 3 & 5 of the Michigan Constitution.

61. Plaintiff intends to publish the newsletter upon the issuance of the injunctive and declaratory relief. Plaintiff, therefore, requires a declaration that such publication was lawful and an injunction against Defendants from refusing to publish the newsletter and from enforcing Printing Rule 6 and Printing Guidelines Rule 3(g) & (h).

**REQUESTS FOR RELIEF**

WHEREFORE, Plaintiff Matt Maddock asks this Court to issue and or award:

- A. A declaration that Printing Rule 6 violates the First Amendment of the U.S. Constitution;
- B. A declaration that Printing Rule 6 violates Article I, §§ 3 & 5 of the Michigan Constitution;
- C. A declaration that Printing Guideline Rule 3(g), 3(h), & 3(af) violates the First Amendment of the U.S. Constitution;
- D. A declaration that Printing Guideline Rule 3(g), 3(h), & 3(af) violates Article I, §§ 3 & 5 of the Michigan Constitution;
- E. A preliminary and permanent injunction against the enforcement of Printing Rule 6;

- F. A preliminary and permanent injunction against the enforcement of Printing Guideline Rule 3(g), 3(h), & 3(af);
- G. Actual Damages in an amount to be determined at trial;
- H. Nominal Damages;
- I. An award of attorneys' fees and expenses under 42 U.S.C. § 1988 and the Michigan Constitution; and
- J. Any further relief the Court deems appropriate.

**DEMAND FOR JURY TRIAL**

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff demands a trial by jury on all causes of action.

Dated: March 12, 2024.

Respectfully Submitted,

/s/ Marc J. Randazza

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*Counsel for Plaintiff,  
Matt Maddock*

**VERIFICATION OF COMPLAINT**

I, Matt Maddock, am the Plaintiff in the above-captioned matter. I have reviewed the foregoing allegations in this Verified Complaint, and I hereby declare under penalty of perjury that the foregoing allegations are true and correct to the best of my knowledge and understanding.

Dated: March 12, 2024

By:   
Matt Maddock

# **Exhibit 1**

## Rule 6 of the Legislative Council Printing Rules

# GENERAL RULES

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*Use of printing and mailing equipment for other than official legislative business prohibited; request to print material of questionable political or personal content; prohibited references in legislative printings.*

## **Rule 6.**

The Legislative Service Bureau's printing and mailing equipment shall be used for official legislative business only. Official legislative business is deemed to include all issues of statewide interest or of general interest to an entire legislative district. The use of legislative equipment for the printing of personal or partisan material of any nature for a legislator is strictly prohibited. The text of printing requests for members of the House shall be reviewed under procedures authorized by the Speaker of the House and the text of printing requests from members of the Senate shall be reviewed under procedures authorized by the Senate Majority Leader. Only printing the Bureau's equipment is capable of producing will be printed. Some examples of specific references in legislative printings which are prohibited are requests to vote for or against someone or some concept, solicitations of money for any purpose, or negative comments about the institution of the legislature or a specific legislator.

*Purchase of legislative printing services prohibited.*

## **Rule 7.**

Legislative printing services may not be purchased by legislators.

# **Exhibit 2**

Draft Newsletter

MADDOCK NEWSLETTER

Subject: Your Rights at Risk in Lansing!

**LANSING UPDATE**

Dear Constituents and Citizens of Michigan,

Thank you for the honor of being your Representative for the 51st District in the Michigan House of Representatives.

There are many things going on in your state Capitol, and many things I would like to bring to your attention as they affect your life and your freedoms.

Government derives its power from the consent of the governed, and that consent is reflected in the contract made with you via the State and Federal Constitutions. Those promises, when broken by a government becoming destructive of those ends, it is the right of the people to speak, react, assemble, argue, discuss, and plan so that they may repair the foundation of freedom, anchored again on principles.

Governor Whitmer and the Democrat-controlled Legislature are the government, and they have a special duty and obligation to act responsibly to affect your Safety and Happiness. Their Prudence and Caution should be reflected in their operations, because to change the social contract is not to be taken lightly.

You often hear politicians endlessly talk about division and disinformation and misinformation. Most of those doing so are the ones who are most guilty of spreading division, disinformation, and misinformation. The loudest on the highest platforms are rarely those who are the most truthful.

So when I bring to you information that might be called divisive or mislabeled as 'dis' or 'mis' information, I do so with a certain clarity and bluntness that might seem offensive, but merely captures the many offensive things that are happening in your legislature.

Let me say it plainly: our Michigan Governor Gretchen Whitmer is a horrible Governor, and she has done an awful job. Our legislature is similarly doing horrible things to your freedoms and to the State of Michigan.

The history of the present Governor of Michigan (Gretchen Whitmer), but also the Democratically-controlled Legislature, led by Speaker Joe Tate, is a history of repeated injuries and transgressions, all having in direct object the establishment of an absolute Tyranny over this State and its Citizens. I submit to you these facts to prove this.



- Whitmer condemned thousands to death through her incredibly negligent COVID policies, which refused the right of the people to accommodate large assemblies of persons and the right of the people to peacefully assemble.
- Whitmer caused thousands of Michigan's elderly to die alone with medically irrational COVID distancing policies. She has refused her assent to laws, the most wholesome and necessary to the public's benefit.
- Whitmer let tens of thousands of Michigander families go hungry during the 2020 unemployment crisis, while rejecting thousands of valid applicants, approving massive amounts of specious applicants, and rejecting reasonable offers of assistance to improve the process.
- Whitmer unethically shut down the state and hurt the Michigan economy based on politics mixed with flawed "science." She also shut down Churches and Houses of Worship during this period of time, while carving out exceptions for herself and her friends. Her husband flaunted these rules, and she was discovered violating her own rules. Meanwhile, she has shown no shame at all for these actions.
- Whitmer has obstructed the administration of justice, with her promotion of policies that lead to higher crime and increase the victimization of Michigan's citizens.
- Whitmer has repeatedly offended the Second Amendment, by signing laws into force that violate an individual's Constitutional right to own and possess firearms.
- Whitmer has remained silent while the nation has been invaded at its borders by individuals coming into the country illegally.
- Gretchen Whitmer has betrayed Michiganders when it comes to the state's infrastructure. She promised to "fix the damn roads" without a tax, and then immediately in office proposed a 45 cent gas tax. She then promised to fix the roads with bonds, and yet the roads are still horrible.
- Whitmer fined and harassed her political opponents who challenged her deceitful lockdowns. She issued fines and made threats to force them to comply and cower in silence. She repeatedly violated the letter and spirit of the First Amendment by using government to harass those who defied her tyrannical orders.
- Whitmer has continued to fund, through her budgets, wasteful and reckless programs that have no relationship to the public good.
- Whitmer has used specious legal arguments to justify arrogance toward campaign finance law limits, including using an advisory opinion in order to justify raising undeserved funds based on the premise she was subject to a recall effort.
- Democrat Committee Chairs in the Legislature have repeatedly denied citizens, and citizen advocacy groups, the right to speak and be heard before their legislature. This is known as "Public Comment" and previously, it was unheard of to deny individuals the right to speak and be heard. Now, it is commonplace.

- Whitmer has illegally rewritten state budgets legally passed by the legislature.

At every turn of this Democrat Oppression, we have Petitioned for Redress in the most humble terms: Our repeated Petitions have been answered only by repeated injury. An Imperial Governor whose character is thus marked by every act which may define a Tyrant, is unfit to be the ruler of free Michiganders.

It's worth remembering that taxation is theft, and every tax dollar is taken with the threat of force. The process of paying taxes is coercive and if you choose not to comply, you will be coerced through the application of violence in the form of financial takings, fines, fees, and arrest and imprisonment.

Since the government doesn't produce anything of value, everything it finances comes through its monopoly on violence. The poor realize this better than the middle and upper class, because they often suffer because of the government's oppressive property taxes pushing them out of their homes, the income taxes penalizing hard work, and various other fines, fees, and taxes that make it hard to make a living.

The government wants you as an indentured servant, financing their ideas. The government wants to take from taxpayers, whom they dislike, to give your money to people they do like, who are their friends.

I and several other Republicans tried to promote fiscal responsibility, but leaders compromised by the Lansing lobby refused to reign in state spending. Now that Democrats are in power, they are engaged in this wild and reckless spending spree.

Governor Whitmer wants everything to be free for the people she likes, and she wants you to work harder and have less money in order to pay for her dreams.

You get to be her worker drones, and she is supposed to be your Queen. Your thoughts on the matter are irrelevant. Your resistance, to the extent it will ever be noticed, will be to crush your dissent and opposition.

If you were content to give up and acquiesce to that abusive relationship, the Queen demands that you submit to Marxist Mind Virus of "DEI." "DEI" stands for "Diversity, Equity, and Inclusion" but in practice it does none of those things, it simply promotes the most destructive ideas possible. It is an ideology that is racist, hateful, and divisive in nature, and teaches kids to hate biology, gender roles, and basic values and virtues like working hard.

Governor Whitmer's proposals, fully supported by the extremists in power in Lansing, will bring us back to economic disaster.

The Democrats have the slimmest of margins, a simple single-vote majority in the House and Senate, and yet they pass the most extreme left-wing bills possible. The extremists among Democrats are unlike any kind of Democrat from our youth. These militant ideologues will stop at nothing to advance their attacks on the Constitution and Bill of Rights.

Elections have consequences. The scale and scope of federal oppression of free speech as evidenced by the Missouri v. Biden case currently going before the Supreme Court, is breathtaking.

The government is actively underway utilizing the power of censorship to silence dissident views. The government is suppressing truthful information. The government is preventing certain ideas, speakers, topics, from reaching you.

For instance, even though Joe Biden is wildly unpopular and is clearly senile and managed by his advisors, the left-wing campaign machinery is in place to prop him up.

Democrat Speaker Joe Tate, whom I proudly voted against, is leading the charge with fellow Democrats to push some of the most oppressive laws and policies possible. They are working in concert with national Democrats and prominent billionaires to attack and end your cherished civil rights.

You have a right to live in a free and independent state. You have a right to take such acts and do such things as those living in free and independent states may of right do.

When I ran for office I promised to support the Constitution, and with a firm reliance on the protection of Jesus Christ, I pledge to you that I will continue fighting for your life, our fortunes, and our sacred honor together.



# **Exhibit 3**

Email Response from Birmingham  
*Re: Draft Newsletter*

## Joseph Foley

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**From:** Tabbatha Birmingham  
**Sent:** Wednesday, February 14, 2024 4:42 PM  
**To:** Joseph Foley  
**Subject:** RE: Maddock Newsletter  
**Attachments:** BUS0301.pdf

Hi Joe,

Thank you for sending this in for review. All mass communications require approval from the Business Office before distribution to ensure compliance with the printing guidelines (attached).

This piece violates multiple portions of the printing guidelines and therefore is not approved.

Below are a couple of examples:

g. Comments critical of the institution of the legislature, legislators or other individuals.

h. Impugn motives of legislators or other individuals, or accusations of intentional misrepresentation.

Thank you  
-Tabbatha

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**From:** Joseph Foley <JFoley@house.mi.gov>  
**Sent:** Wednesday, February 14, 2024 3:54 PM  
**To:** Tabbatha Birmingham <TBirmingham@house.mi.gov>  
**Subject:** Maddock Newsletter

Hello Tabbatha,

Rep Maddock wants to send out a newsletter.

I'm working with our MSA but I've been told that it needs to be approved by HR before it can be emailed out.

Could you review please to make sure it complies with the appropriate House rules?

I have attached our draft to this email.

If there is anything else you need on our end, please let me know.

Thanks,

Joe Foley  
Legislative Aide  
Rep. Matt Maddock  
District 51  
517-373-1780



Administration/Business Office  
Revised: August 25, 2023

**PRINTING GUIDELINES**  
BUS 03.01

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## **GUIDELINES FOR THE FIRST YEAR OF A REPRESENTATIVE'S TWO-YEAR TERM**

The allotment applicable in any two-year term may not be expended until the date of the convening of the Legislature or upon taking of the oath of office, whichever is later.

**OFFICIAL MAIL** – All communications whether in self-mail format, inserted in newspapers or in standard official envelopes, will be considered official business of the House of Representatives. Official mail can be express mail, first-class mail, bulk-mail and/or interdepartmental mail.

**It is understood that it may be necessary for a Representative to correspond by mail with citizens residing outside of his/her legislative district under certain circumstances. Correspondence of this nature includes forwarding requested information on specific legislation sponsored by the Representative and/or replies to correspondence received by the Representative. All other mailings to persons located outside of a Representative's district are strictly prohibited, unless given approval by the Speaker or the Speaker's designee.**

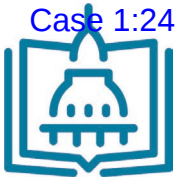
**AMOUNT OF MAILINGS PERMITTED:** At the beginning of the first year (January 2023) of a Representative's two-year term, each Member's allotment account will reflect an allotted budget amount. Any part of this amount may be used at any time throughout the year, but in no event may an aggregate in excess of the aforementioned allotment figures be expended. The amount of postage and publications cost used each month will be deducted from this allowance and the remainder will be the amount available for the remainder of the calendar year. No amount remaining in a Representative's allotment account at the end of a calendar year can be carried forward to the next year's account.

A Representative elected to a vacant seat during the first year of the usual two-year term will have the designated allotment pro-rated on a per diem basis to the date the Representative officially takes office.

**ESTIMATE SLIPS:** Any mailing of same or similar pieces requiring more than \$500.00 of postage expenditure must be accompanied by an Estimate Slip which will be issued by the Financial Operations Office for each such mailing. The purpose of an Estimate Slip is to guarantee that there will be sufficient postage available in the Representative's account to cover the mailing. It is important that an Estimate slip be obtained early in the preparation process.

**ALLOTMENT EXPENDITURE REVIEW:** As noted in House Guidelines and Policies (see FIN 02.01), Representatives have the responsibility to utilize these funds specific to their legislative needs within the approved guidelines. The responsibility of carefully budgeting those dollars throughout the year also rests with their office. Representatives' offices have continuous access to their allotment accounts via the allotment program, which can be accessed by selecting the office allotment icon on their office computer. It is suggested that this information be carefully and frequently reviewed. Any questions regarding the office allotment account program can be directed to the House Financial Operations office (3-7678).

Further, all financial transactions are subject to review by the media and public as outlined in the House Guidelines and Policies (see BUS 02.01 – Access to Information Policy) and House Rules.



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Administration/Business Office  
Revised: August 25, 2023

**PRINTING GUIDELINES**  
BUS 03.01

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**LOCAL OR SPECIAL ELECTIONS:** Same or similar pieces of mail using postage in excess of \$100 per day (\$500 total maximum) may not be mailed during the 30 days prior to the date of the local or special primary or general elections.

## **GUIDELINES FOR THE SECOND YEAR OF A REPRESENTATIVE'S TWO-YEAR TERM**

**AMOUNT OF MAILINGS PERMITTED:** At the beginning of the second year of a Representative's two-year term, each Member's allotment account will reflect an allotted budget amount. Any part of this amount may be used at any time throughout the year, but in no event may an aggregate in excess of the aforementioned allotment figures be expended. The amount of postage and publications will be deducted from this allowance and the remainder will be the amount available for the remainder of the calendar year, with the exceptions of the following time periods: **Between July 6 and August 6, 2024, and between October 5 and November 5, 2024, a maximum of \$500 for postage will be available in the Member's account.** This is to provide a sufficient amount to accommodate routine legislative correspondence and publications. Note: The \$500 limit does not apply to ballot question explanations which may be sent during this period provided there are sufficient funds remaining in the account. Such ballot question explanations shall be subject to prior authorization by the Speaker.

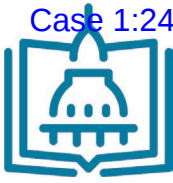
Except for approved ballot proposal explanations, same or similar pieces of mail using postage in excess of \$100 per day (\$500 total maximum) may not be mailed during the following reduced mail periods: July 6 through August 6 and October 5 through November 5.

A Representative elected to a vacant seat during the second year of the usual two-year term will have the designated allotment pro-rated on a per diem basis to the date the Representative officially takes office.

**ESTIMATE SLIPS:** Any mailing of same or similar pieces requiring more than \$500 of postage expenditure must be accompanied by an Estimate Slip which will be issued by the Financial Operations Office for each such mailing. The purpose of an Estimate Slip is to guarantee that there will be sufficient postage available in the Representative's account to cover the mailing. It is important that an Estimate Slip be obtained early in the preparation process.

For mailings to be mailed at the end of the calendar year, postage will be guaranteed to be charged to the year when BOTH of the following occurs:

- a) The Legislator makes a request to staff (Democratic, Republican or Legislative Service Bureau) to have copy written on or before Wednesday, November 6, 2024. If the mailing is to be guaranteed to be charged to the 2024 calendar year allotment, then the writing of the item to be mailed has to be requested from the newsletter staff persons by the 6th of November, AND
- b) The final proof, signed by the Member, given to the print shop (House or Legislative Service Bureau) on or before Monday, November 18, 2024.



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If these compliance requirements are met, then the print shop will be able to mail and must mail by the December 30, 2024 deadline. If the print shops are not being used to prepare mailings, then the mailing must be sent out of the Member's office no later than 4:00 p.m., December 30, 2024.

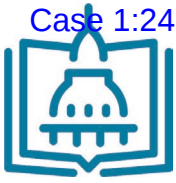
**ALLOTMENT EXPENDITURE REVIEW:** As noted in House Guidelines and Policies (see FIN 02.01), Representatives have the responsibility to utilize these funds specific to their legislative needs within the approved guidelines. The responsibility of carefully budgeting those dollars throughout the year also rests with their office. Representatives' offices have continuous access to their allotment accounts via the allotment program, which can be accessed by selecting the office allotment icon on their office computer. It is suggested that this information be carefully and frequently reviewed. Any questions regarding the office allotment account program can be directed to the House Financial Operations office (3-7678).

Members who are not returning and are within 10 weeks of their departure may not order additional printed supplies or booklets. (see FIN 02.01)

Further, all financial transactions are subject to review by the media and public as outlined in the House Guidelines and Policies (see BUS 02.01 – Access to Information Policy) and House Rules.

**LOCAL OR SPECIAL ELECTIONS:** Same or similar pieces of mail using postage in excess of \$100 per day (\$500 total maximum) may not be mailed during the 30 days prior to the date of the local or special primary or general elections.





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## **HOUSE OF REPRESENTATIVES' PRINTING GUIDELINES, RULES AND PROCEDURES**

The Printing Guidelines cover printing and similar items in electronic format (i.e. e-news, tele-townhalls, robo calls, text messages, official social media...) and related work done in the House Duplicating Center (HDC) and the Legislative Service Bureau (LSB) Print Shop. While we attempt to keep mass communication by a Member in the confines of their district, we understand that electronic mail and video may not consign itself to that limitation. However, the content of that communication must purport to House printing guidelines.

All newsletters and items meant for mass distribution, whether printed or electronic, including items on the House's/Caucus' websites, must conform to House and Legislative Service Bureau guidelines. (Note: Any exception to this policy for materials to be placed on House websites must be approved by the House Business Office prior to placement on the website) Printed material must be processed by the HDC or LSB Print Shop. As a reminder, all newsletters, robo-calls, tele-townhall announcements, legislative updates, and other such communications, whether printed or electronic, must be reviewed by the House Business Office and the Speaker's office prior to the information being released to the public.

The purpose of the printing privilege is to allow each Representative appropriate communication with their district. If, for any reason, a specific question is not covered in these guidelines, the issue will be resolved at the discretion of the Speaker or the Speaker's designee. Printing requests processed through the LSB Print Shop are also subject to rules established by the Legislative Council. If any portion of the rules conflict with the House policy, the House policy will take precedent.

### **Quotas**

#### ***Annual printing quota for Representatives; forfeiture of unused portion.***

1. The annual printing quota for Representatives is 600,000 printed sides through the use of House Duplicating Center facilities. Each member of the House of Representatives also has an annual printing allotment of 800,000 printed sides in the Legislative Service Bureau Print Shop (LSB). If a Member has used their annual quota of the LSB allotment, they may request a transfer of a portion of their House Duplicating Center quota to the Bureau. Unused portions of the annual printing quota cannot be accumulated. Legislators, on December 31 of each year, shall forfeit any unused portion of their annual printing quota.

#### ***Legislator elected to less than full term; prorated printing quota.***

2. Legislators elected to less than a full term of office shall be entitled to a percentage of the respective annual printing quota which shall be determined by dividing the number of months remaining in the year in which elected by the total months in the year.



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## General Rules

***The use of House computers (including email and the network), printing and mailing equipment for any use other than official legislative business is prohibited; request to print material of questionable political or personal content; prohibited references in legislative printing.***

3. The House Duplicating Center's and Legislative Service Bureau's printing and mailing equipment shall be used for official legislative business only. Only printing the HDC's or LSB's equipment is capable of producing will be printed. Official legislative business is deemed to include all issues of statewide interest or of general interest to an entire legislative district. The use of legislative equipment for the printing of personal or partisan material of any nature for a legislator is strictly prohibited. Examples of prohibited printed or electronic material include, but are not limited to:
  - a. Political cartoons depicting recognizable political personalities and/or parties.
  - b. Reports on the personal life, family, family life of a legislator or legislative staff member.
  - c. Articles by a legislator's spouse or legislative staff.
  - d. Holiday greetings, with the exception of a single graphic and/or one line holiday greeting in the same type style and size as the text of the publication. Holidays included are: New Year's Day, St. Patrick's day, Christmas, Hanukkah, Kwanza, Thanksgiving, Veteran's Day, April Fool's, Cinco de Mayo, President's Day, Columbus Day, Martin Luther King Day, Valentine's Day, Easter, Good Friday, Memorial Day, 4<sup>th</sup> of July, Labor Day, Memorial Day, Father's Day, Mother's Day, Yom Kippur, Passover, Ramadan, and Halloween.
  - e. References to past or future campaigns or elections.
  - f. A thank you or message regarding election to office.
  - g. Comments critical of the institution of the legislature, legislators or other individuals.
  - h. Impugn motives of legislators or other individuals, or accusations of intentional misrepresentation.
  - i. Solicitations of political support for a legislator or any person or political party, or a vote or financial assistance for any candidate for any political office.
  - j. Solicitations for or on behalf of a private organization for the purpose of supporting any charitable, educational, religious, or political program.
  - k. Position papers or articles by private persons, reproduction of minutes, reports, newspapers of outside organizations or clubs.
  - l. State or local ballot issue explanations; initiatives, or referendums approved to be on the ballot.
  - m. Newspaper clippings, editorials, posters and pictures that are personal, political and/or do not relate to the work of the legislature.
  - n. Notifications or endorsements of products or services available from commercial or non-profit corporations, except within booklets or brochures of a public service nature which have been approved by the appropriate authority.



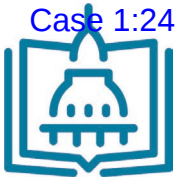
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- o. Campaign logos, slogans, websites, phone numbers and e-mails.
- p. Legislative telephone numbers, mailing addresses, email addresses or websites used for or represented as being the contact for any non-legislative purpose or organization.
- q. Publications and stickers containing "Compliments of" or other similar designations, pursuant to Section 24.17 of the Michigan Compiled Laws.
- r. Printing which reproduces the Great Seal of Michigan, or print the flag, standard, color, ensign or shield of the United States or Michigan, or Coat of Arms of the United States, upon which any word, figure, mark, picture, design, or drawing is to be printed, pursuant to section 750.244 of the Michigan Compiled Laws.
- s. Newsletters, legislative summations, questionnaires, and similar material which are designed to be mailed, newspaper inserted, or hand distributed outside the requesting legislator's current legislative district (see BUS 03.03, FAC 02.01 and FIN 02.01 for further definition).
- t. The Print Shops shall not print copyrighted material or portions of copyrighted material, including newspaper headings and stories, cartoons, pictures, graphics, magazine articles, or other written materials unless written authorization is received from the copyright holder and attached to the printing request. The Print Shops shall not print material copyrighted by a member or committee of the legislature. The House shall not pay copyright fees charged by copyright holders to reprint the material.
- u. Printing in foreign languages.
- v. Printing/ mailing in combination with another legislator or mass communication, whether paper or electronic, which includes links to a website that contains material created in combination with another legislator. Legislators may list another legislator as a special guest.
- w. Invitations to meetings/events hosted outside the confines of a Member's district.
- x. "You're in the News" folders.
- y. News letterheads and news release letterheads without text.
- z. Materials without the Representative's name or signature, or items where it is not clear that the items are originating from the Representative.
- aa. Bumper stickers, magnets, buttons and other such items.
- ab. Information on or notification of events in which the legislator will participate that will occur on a future date beyond the legislator's current term.
- ac. Statewide or local nominating and ballot proposal petitions and absentee ballot applications.
- ad. Any reference to the names of or how to contact individuals if the purpose of the reference is to urge those individuals to take action on an issue or if the reference could be construed as derogatory in nature.
- ae. Birthday greetings and messages.



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- af. Issues intending to influence pending court cases. Issues related to a pending court case unless the issue is directly before the state legislature.
- ag. Social media websites that do not relate to the work of the legislature or fail to include the disclaimer that the Michigan House of Representatives is only responsible for the content originating from the Representative (see BUS 03.05).

***Purchase of legislative printing services prohibited.***

- 4. Legislative printing services may not be purchased by legislators.

***Identification of materials printed by legislators.***

- 5. All materials printed for legislators must include the name of the legislator requesting the printing, and it must be evident that the materials are being printed by the legislator. Materials must also include a date or time period of the printing (i.e., Fall 2009). This rule does not apply to the standardized booklets (see Item #12), which are not printed with the Member's name.

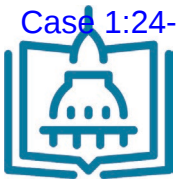
***Printing requests.***

- 6. All Members' requests for printing services must be submitted to the Publications Sections. Each respective partisan Publications Section shall notify the Representative of the areas where there is noncompliance with these guidelines, rules and procedures. The Publications Sections serve their respective caucuses and staff in the coordination of all newsletters, booklets, and any other printed materials prepared for distribution and use by the Representatives and/or staff. The Democratic Publication Section is located on the 14th Floor, Anderson House Office Building (3-5778 or 3-5342). The Republican Publication Section is located on the 7th Floor, Anderson House Office Building (3-9084). When Members' requests are submitted to Publications, the following information must be provided by the Members' office in order for the work order to be submitted to LSB/HDC:
  - quantity of publications needed
  - color of ink and stock
  - personalization information
  - mailing information

***Proofs.***

- 7. Graphic designers will design layout for the publication. Once the publication is designed and laid out, a proof will be sent to the requesting Representative's office with a proof authorization form. The Representative's office is responsible for signing off on the proof authorization form after reviewing the publication for:
  - design approval, suggestions or corrections
  - copy approval, suggestions or corrections

To maintain print priority, all proofs must be returned to the Publications Coordinator within 48 hours. Printing delayed because of late proof returns will be removed from the production schedule and rescheduled at the time and date the proof is returned.



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## Specifications for Printing and Supplies

### ***Approved paper colors; paper weights.***

8. Only white and ivory (text weight) may be used for legislative newsletters and printing. Legislative printing shall be printed on paper of 70#, except when heavier paper must be used to meet Post Office regulations. The heavier stock for booklet covers only is also authorized. Cover stock is available in cream and white.

### ***Approved ink colors.***

9. The available ink colors for legislative printed material at the Legislative Service Bureau Print Shop and House Duplicating Center are:

Black	Blue	Brown	Burgundy	Red
Green	Navy	Olive	Orange	Purple
Teal	Light Green	Yellow		

Two-color print jobs with the approved inks are authorized for a minimum quantity of 200. Any amount under 200 is done in the copy center. Exceptions can be made for certificates.

### ***Newsletters; printing lead time.***

10. The required lead-time for newsletters is two weeks from receipt of the final LSB proof (with authorized sign off). This includes mailing time if the labels have been provided.

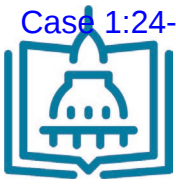
### ***Standardized booklets***

11. A maximum number of 26 standardized booklets are also available to legislators through the Legislative Service Bureau. The booklets available shall be those designated by the Legislative Council Policy Subcommittee.

Standardized booklets shall not be personalized for requesting legislators. Booklets include a standard cover and text pages printed with black ink. A minimum order for booklets is 25 copies. There is a 1 box minimum for pre-labeled books.

### ***Postage paid return postcards.***

12. Postage paid return postcards will be printed only if the House Financial Operations Office notifies the HDC that the requester has sufficient postage to cover the cost of mailing the postage paid return cards.



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## Pictures and Graphics

### *Pictures allowed in printed or electronic materials.*

13. Pictures may include the individual legislator for whom the work is being completed and group pictures.

**You are also reminded that one month prior to the last date for filing nominating petitions for a state or local election through the general election, ONLY photographs of the Member requesting the e-news or newsletter may be used in the pieces being printed by any of the print shops except for approved stock photos provided by the caucus coordinator and approved by the Business Office. (See Printing & Mailing Deadlines for further information.)**

### *Allowable space dedicated to pictures, line art, artwork and headlines.*

14. Pictures and headlines shall not exceed fifty percent of the total area of a legislator's printing. Background watermarks (excluding member photos), letterheads, self-mailer permit forms, and captions in boldface used to separate paragraphs or sections of printed matter shall not be considered as headlines and shall not be considered in determining the percentage of space dedicated to pictures and headlines in a legislative printing.

## Address List

### *Mailing lists.*

15. The HDC will accept only mailing lists from the Publications units that are formatted for their ink jet address system.

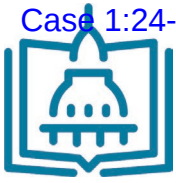
## Envelopes and Mailings

### *Envelopes to be labeled by HDC equipment; restrictions.*

16. Envelopes sent to the HDC for labeling must be official envelopes and must be of such size that can be processed by the HDC's equipment. Under no circumstances are plain envelopes or campaign envelopes to be labeled by the HDC.

### *Envelopes processed by HDC.*

17. All envelopes stuffed by the HDC must be sealed by the HDC.
18. No business reply mail.



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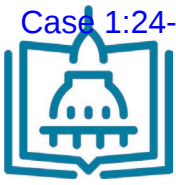
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## **2023 PRINTING & MAILING DEADLINES**

In accordance with the "Guidelines for House of Representatives Allotment Program," any time you want to have literature mailed, you must have sufficient funds remaining in your allotment account. If you would like to check your postage allotment balance, please use your office allotment icon on your computer or you may call the Financial Operations Office (3-7678).

When you are having literature printed, you must also have an adequate balance in your printing quota (sheet sides). To check your printing quota balance, Democratic Members should call 3-5778 or 3-5342; Republican Members should call 3-9084.



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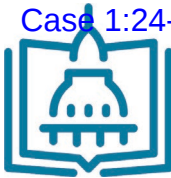
### 2023 YEAR-END PRINTING/MAILING DEADLINES

- Monday, October 30, 2023  
Deadline for submitting requests for newsletters and all bulk mailings to be printed using 2023 printing impressions. This includes newsletters to be written by staff writers and any newsletters in which offices will be supplying text copy. All articles written by offices must be submitted with the original request. A final proof will be delivered to the Representative's office for approval before printing. The Representative's office must proofread, approve and return the final proof no later than 24 hours after it is delivered to the office in order to meet the year end mailing deadlines.
- Thursday, November 9, 2023  
Deadline for submission of a final proof, signed by the Member, to the LSB Print Shop or House Duplicating Center for printing and mailing prior to the year end printing/mailing deadline.
- Wednesday, November 29, 2023  
Deadline for ordering all generic booklets along with any miscellaneous printing such as memo pads, constituent referral pads, stationery requests, etc., using 2023 printing impressions and office allotment. NOTE: All orders placed after this date will be charged to 2024 printing impressions/office allotments and delivered after January 1, 2024.
- Friday, December 8, 2023  
Deadline for forwarding all label jobs from LSB and offices to the House Duplicating Center to meet December 28th mailing deadline.
- Thursday, December 28, 2023  
Deadline for mailings sent from a Representative's office and the last date the LSB Print Shop or House Duplicating Center can and must forward newsletters, booklets, or other publications to the Post office, mailing company and/or newspaper companies for charge against 2023 printing and postage allotments. This does not include routine mail. Any mail to be charged to the 2024 allotment will not be accepted until January 2, 2024.

If there are any questions regarding these deadlines, please contact your respective Publications Coordinator.

**IMPORTANT NOTE: No portion of a Member's printing impression (sides) or allotment account can be carried over to 2024.**





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## 2024 PRINTING & MAILING DEADLINES

As you plan to mail newsletters, booklets and other legislative publications for the 2024 calendar year, you should be aware of the deadlines for pre-election printing and mailing, including e-news and social media.

In accordance with the "Guidelines for House of Representatives Allotment Program," any time you want to have literature mailed, you must have sufficient funds remaining in your allotment account. You may check your computer or contact the Financial Operations Office (3-7678) for your allotment balance.

When you are having literature printed, you must also have an adequate balance in your printing quota (sheet sides). To check your printing quota balance, please contact your respective Publications Coordinator.

**Thirty days prior to the statewide primary and general elections, each Representative's allotment account is limited to \$500 for postage, so it will not be possible for you to undertake any large scale, state-paid mailings during this time. Mailing privileges are limited to routine office mail. Regardless of size, an unsolicited mailing is prohibited. This year, the limited allotment periods are Saturday, July 6, 2024 through Tuesday, August 6, 2024 for the primary, and Saturday, October 5, 2024 through Tuesday, November 5, 2024 for the general election.**

**PLEASE NOTE: These dates apply to literature printed by either the LSB Print Shop or House Duplicating Center and forwarded directly to a mailing company, the post office and/or newspapers, as well as mailings sent directly from your office.**

In order to assure that your legislative mailings reach your districts at the time you want, please plan accordingly and carefully note the attached pre-election deadlines for staff writing, printing, and mailing of materials. These deadlines apply to materials generated through the House and Legislative Service Bureau.

**You are also reminded that from March 18, 2024 (one month prior to the last date for filing nominating petitions for the election) through November 5, 2024, the ONLY photos that can be used in the pieces being printed, or included in an e-news are photos of the Representative (pictured alone) for whom the printing is being completed, approved stock photos provided by the caucus coordinator or photos that have no people in them.**



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### **2024 PRIMARY ELECTION PRINTING AND MAILING DEADLINES**

- |                          |   |
|--------------------------|---|
| Thursday, April 25, 2024 | Deadline for requests to staff writers for NEWSLETTER copy for submission to your printing coordinator to meet the July 5, 2024 mailing deadline. A final proof of NEWSLETTER copy will be delivered to the Representative's office for approval before printing. The Representative's office must proofread, approve and return the FINAL PROOF no later than 24 hours after it is delivered to the office in order to meet the July 5, 2024 mailing deadline.   |
| Thursday, May 16, 2024   | Deadline for submission of a final proof, signed by the Member, to the LSB Print Shop or House Duplicating Center for printing and mailing prior to the primary election mailing deadline.  |
| Wednesday, June 5, 2024  | Deadline for forwarding all labeling jobs to the House Duplicating Center for mailing prior to the primary election mailing deadline.   |
| Friday, July 5, 2024     | Deadline for both printed and electronic mailings sent from a Representative's office and the last date the LSB Print Shop or House Duplicating Center can and must forward newsletters, booklets, or other publications to the Post Office, mailing companies and/or newspaper companies before the primary election.<br><br>The deadlines include all mass communications to be sent from a Member office including but not limited to e-news, robo-calls, tele-townhalls, text messages, or official social media. |

During the reduced allotment period of Saturday, July 6, 2024 to Tuesday, August 6, 2024 you will have a maximum of \$500 in your allotment account to cover mailing routine legislative correspondence and publications. No unsolicited mail is allowed during this time.



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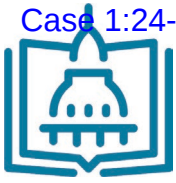
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### **2024 GENERAL ELECTION PRINTING AND MAILING DEADLINES**

- |                            |   |
|----------------------------|---|
| Wednesday, August 7, 2024  | Deadline for requests to staff writers for NEWSLETTER copy for submission to your printing coordinator to meet the October 4, 2024 mailing deadline. A final proof of NEWSLETTER copy will be delivered to the Representative's office for approval before printing. The Representative's office must proofread, approve and return the FINAL PROOF no later than 24 hours after it is delivered to the office in order to meet the October 4, 2024 mailing deadline. |
| Wednesday, August 28, 2024 | Deadline for submission of a final proof, signed by the Member, to the LSB Print Shop or House Duplicating Center for printing and mailing prior to the general election mailing deadline.  |
| Friday, September 20, 2024 | Deadline for forwarding all labeling jobs to the House Duplicating Center for mailing prior to the general election mailing deadline.   |
| Friday, October 4, 2024    | Deadline for mailings sent from a Representative's office and the last date the LSB Print Shop or House Duplicating Center can and must forward newsletters, booklets, or other publications to the Post Office, mailing companies and/or newspaper companies before the general election.  |

During the reduced allotment period of Saturday, October 5, 2024 to Tuesday, November 5, 2024, you will have a maximum of \$500 in your allotment account to cover mailing routine legislative correspondence and publications. No unsolicited mail is allowed during this time.

NOTE: If there are ballot questions on the November ballot, you may use regular unexpended funds in your allotment account and printing quota to have BALLOT QUESTION NEWSLETTERS printed and mailed. The Speaker or the Speaker's designee must approve copy for the Ballot Question Newsletters. DEADLINES for Ballot Question Newsletters will be announced after the November ballot language is approved by the Secretary of State.



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### **2024 YEAR END PRINTING & MAILING DEADLINES**

Wednesday, November 6, 2024	Deadline for requests to staff writers for NEWSLETTER copy for submission to your publications coordinator to meet the year-end mailing deadline. A final proof of NEWSLETTER copy will be delivered to the Representative's office for approval before printing. The Representative's office must proofread, approve and return the FINAL PROOF no later than 24 hours after it is delivered to the office in order to meet the year end mailing deadlines.
Monday, November 18, 2024	Deadline for submission of a final proof, signed by the Member, to the LSB Print Shop or House Duplicating Center for printing and mailing prior to the year-end mailing deadline.
Wednesday, December 4, 2024	Deadline for requests for booklets, stationery and all other miscellaneous printing requests through either the LSB Print Shop or House Duplicating Center utilizing 2024 printing allotment.
Friday, December 6, 2024	Deadline for forwarding all labeling jobs to the House Duplicating Center for mailing prior to the year-end mailing deadline.
Monday, December 30, 2024	Deadline for mailings sent from a Representative's office and the last date the LSB Print Shop or House Duplicating Center can and must forward newsletters, booklets, or other publications to the Post Office, mailing companies and/or newspaper companies for charge against 2024 printing and postage allotments.

If there are any questions regarding these deadlines, please contact your respective Publications Coordinator.

**IMPORTANT NOTE: No portion of the Member's printing sides or allotment account may be carried over to the 2025 calendar year.**

# **Exhibit 4**

Email Response from Birmingham  
*Re: Draft Newsletter*

Good afternoon Rachel,  
Attached you will find a copy of the printing guideline general rules as well as the e-news submitted with the violations identified.  
Have a great weekend

Good morning!  
Our office is working on an email newsletter. Could you please let us know which passages violate the House Rules? Otherwise we are having to guess and we are not sure we understand which section violate which rules.  
Thank you!  
Rachel Atwood – Legislative Aide  
Office of Representative Matt Maddock  
51<sup>st</sup> House District  
[\(517\) 373-1780](tel:5173731780)  
[MattMaddock@house.mi.gov](mailto:MattMaddock@house.mi.gov)

Tabbatha,

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My colleague Joe Foley is out on leave so I'm picking up this for him while he's gone. He said that he previously sent a newsletter for Rep. Maddock that had some issues on it that you identified. I'm trying to fix those things so I can get it out or back to you so we can get it out quick. If you could tell me what the specific problems were it will help me get this done.

Thank you so much!

Rachel Atwood

Tabbatha,

My colleague Joe Foley is out on leave so I'm picking up this for him while he's gone. He said that he previously sent a newsletter for Rep. Maddock that had some issues on it that you identified. I'm trying to fix those things so I can get it out or back to you so we can get it out quick. If you could tell me what the specific problems were it will help me get this done.

Rachel

Good morning Rachel

Was it the e-news that was previously sent? I would love to help out with this anyway that I can

-Tabbatha

How do I respond?

MADDOCK NEWSLETTER

Subject: Your Rights at Risk in Lansing!

**LANSING UPDATE**

Dear Constituents and Citizens of Michigan,

Thank you for the honor of being your Representative for the 51st District in the Michigan House of Representatives.

There are many things going on in your state Capitol, and many things I would like to bring to your attention as they affect your life and your freedoms.

Government derives its power from the consent of the governed, and that consent is reflected in the contract made with you via the State and Federal Constitutions. Those promises, when broken by a government becoming destructive of those ends, it is the right of the people to speak, react, assemble, argue, discuss, and plan so that they may repair the foundation of freedom, anchored again on principles.

Governor ~~Whitmer~~ and the Democrat-controlled Legislature <sup>are the government</sup>, and they have a special duty and obligation to act responsibly to affect your Safety and Happiness. Their Prudence and Caution should be reflected in their operations, because to change the social contract is not to be taken lightly.

You often hear politicians endlessly talk about division and disinformation and misinformation. <sup>Rule G</sup> [Most of those doing so are the ones who are most guilty of spreading division, disinformation, and misinformation.] [The loudest on the highest platforms are rarely those who are the most truthful.]

So when I bring to you information that might be called divisive or mislabeled as 'dis' or 'mis' information, I do so with a certain clarity and bluntness that might seem offensive, but <sup>Rule G</sup> [merely captures the many offensive things] that [are happening] in your legislature.

Let me say it plainly: our Michigan Governor ~~Gretchen Whitmer~~ <sup>Rule G</sup> is a [horrible] Governor, and she has done [an awful job]. [Our legislature is similarly doing horrible things to your freedoms and to the State of Michigan.] <sup>Rule G</sup>

The history of the present Governor of Michigan (~~Gretchen Whitmer~~), but also the Democratically-controlled Legislature, led by Speaker ~~Joe Tate~~ <sup>Rule G & H</sup>, [is a history of repeated injuries and transgressions,] all having in direct object the establishment [of an absolute Tyranny over this State and its Citizens.] I submit to you these facts to prove this.

Remove name refer to as the speaker

Rule H

Remove name. - Refer to as "The Governor" throughout the piece. ONLY part of



All highlights are in violation of RULES G & H

- Whitmer [condemned thousands to death through her incredibly negligent COVID policies, which refused the right of the people to accommodate large assemblies of persons and the right of the people to peacefully assemble.]
- Whitmer [caused thousands of Michigan's elderly to die alone with medically irrational COVID distancing policies. She has refused her assent to laws,] the most wholesome and necessary to the public's benefit.
- Whitmer [let tens of thousands of Michigander families go hungry during the 2020 unemployment crisis], [while rejecting thousands of valid applicants,] approving massive amounts of specious applicants, and [rejecting reasonable offers of assistance to improve the process.]
- Whitmer [unethically] shut down the state and [hurt the Michigan economy based on politics mixed with flawed "science." ] She also shut down Churches and Houses of Worship during this period of time, [while carving out exceptions for herself and her friends. Her husband flaunted these rules, and she was discovered violating her own rules.] [Meanwhile, she has shown no shame at all for these actions.]
- Whitmer [has obstructed the administration of justice, with her promotion of policies that lead to higher crime and increase the victimization of Michigan's citizens].
- Whitmer has [repeatedly offended the Second Amendment], by signing laws into [force] [that violate an individual's Constitutional right to own and possess firearms].
- Whitmer [has remained silent while the nation has been invaded at its borders by individuals coming into the country illegally].
- Gretchen Whitmer has [betrayed Michiganders when it comes to the state's infrastructure]. She promised to "fix the damn roads" without a tax, and then immediately in office proposed a 45 cent gas tax. She then promised to fix the roads with bonds, and yet the roads are still horrible.
- Whitmer [fined and harassed her political opponents who challenged her deceitful lockdowns]. [She issued fines and made threats to force them to comply and cower in silence. She repeatedly violated the letter and spirit of the First Amendment by using government to harass those who defied her tyrannical orders].
- Whitmer [has continued to fund, through her budgets, wasteful and reckless programs [that have no relationship to the public good].
- Whitmer [has used specious legal arguments to justify arrogance toward campaign finance law limits, including using an advisory opinion in order to justify raising undeserved funds based on the premise she was subject to a recall effort].
- Democrat Committee Chairs in the Legislature have [repeatedly] denied citizens, and citizen advocacy groups, the right to speak and be heard before their legislature. This is known as "Public Comment" [and previously, it was unheard of to deny individuals the right to speak and be heard. Now, it is commonplace].

- UTA Approves or Denies



- **Whitmer** has [illegally rewritten state budgets legally passed by the legislature].

At every turn of this [Democrat Oppression], we have Petitioned for Redress in the most humble terms: Our repeated Petitions have been answered only by repeated injury. [An Imperial Governor whose character is thus marked by every act which may define a Tyrant, is unfit to be the ruler of free Michiganders].

It's worth remembering that [taxation is theft,] and [every tax dollar is taken with the threat of force]. The process of paying taxes [is coercive] and if you choose not to comply, you will be [coerced through the application of violence] in the form of financial takings, fines, fees, and arrest and imprisonment.

[Since the government doesn't produce anything of value, everything it finances comes through its monopoly on violence]. The poor realize this better than the middle and upper class, [because they often suffer because of the government's oppressive property taxes pushing them out of their homes], the income taxes penalizing hard work, and various other fines, fees, and taxes that make it hard to make a living.

[The government wants you as an indentured servant, financing their ideas]. [The government wants to take from taxpayers, whom they dislike, to give your money to people they do like, who are their friends].

I and several other Republicans tried to promote fiscal responsibility, [but leaders compromised by the Lansing lobby] [refused] to reign in state spending. [Now that Democrats are in power, they are engaged in this wild and reckless spending spree].

**Governor Whitmer** [wants everything to be free for the people she likes], and [she wants you to work harder and have less money in order to pay for her dreams].

[You get to be her worker drones], and [she is supposed to be your Queen]. [Your thoughts on the matter are irrelevant]. [Your resistance, to the extent it will ever be noticed, [will be to crush your dissent and opposition]].

[If you were content to give up and acquiesce to that abusive relationship, the Queen demands that you submit to Marxist Mind Virus of "DEI." "DEI" stands for "Diversity, Equity, and Inclusion" but in practice it does none of those things, it simply promotes the most destructive ideas possible]. It is an ideology that is racist, hateful, and divisive in nature, and teaches kids to hate biology, gender roles, and basic values and virtues like working hard.

**Governor Whitmer's** proposals, [fully supported by the extremists in power in Lansing], will bring us back to economic disaster.

All rights violate  
RULES G & H.

violates  
rule 6 H

The Democrats have the slimmest of margins, a simple single-vote majority in the House and Senate, and yet [they pass the most extreme left-wing bills possible]. [The extremists among Democrats are unlike any kind of Democrat from our youth]. [These militant ideologues will stop at nothing to advance their attacks on the Constitution and Bill of Rights].

Elections have consequences. The scale and scope of federal oppression of free speech as evidenced by the Missouri v. Biden case currently going before the Supreme Court, is breathtaking.

↑ violates  
rule AF

The government is actively underway [utilizing the power of censorship to silence dissident views]. The government [is suppressing truthful information]. The government [is preventing certain ideas, speakers, topics, from reaching you].

For instance, [even though Joe Biden is wildly unpopular and is clearly senile and managed by his advisors, the left-wing campaign machinery is in place to prop him up].

Democrat Speaker Joe Tate, whom I proudly voted against, [is leading the charge with fellow Democrats to push some of the most oppressive laws and policies possible]. [They are working in concert with national Democrats and prominent billionaires to attack and end your cherished civil rights].

You have a right to live in a free and independent state. You have a right to take such acts and do such things as those living in free and independent states may of right do.

When I ran for office I promised to support the Constitution, and with a firm reliance on the protection of Jesus Christ, I pledge to you that I will continue fighting for your life, our fortunes, and our sacred honor together.

For Michigan,

Representative Matt Maddock

Rule 6 violates  
rule H

Rule 6  
H