STATE OF MICHIGAN

COURT OF CLAIMS

NAMITA SHARMA, SUSHI DATTA-SANDHU, and FRANCES DWIGHT

Plaintiffs,

v

Case No. 26-000125-MZ

MICHIGAN BUREAU OF ELECTIONS and JONATHAN BRATER, Director of the Michigan Bureau of Elections, in his official capacity,

Hon. James Robert Redford

Defendants.
_____/

OPINION AND ORDER GRANTING DEFENDANTS' 6/18/26 MOTION FOR SUMMARY DISPOSITION

Plaintiffs—Judge Namita Sharma, Sushi Datta-Sandhu, and Frances Dwight—challenge the refusal of defendants—Michigan Bureau of Elections and Director Jonathan Brater—to certify Judge Sharma's candidacy for reelection to the 8th District Court. The Court has thoroughly reviewed the pleadings, the Constitution, and the statutes relevant to plaintiffs' arguments. Contrary to plaintiffs' claims, requiring incumbent district court judge candidates to file an Affidavit of Identity does not violate any constitutional provision and advances the interest of election integrity. The Court GRANTS defendants' motion for summary disposition and DISMISSES plaintiffs' action in its entirety and with prejudice.

I. BACKGROUND

In 2021, plaintiff Namita Sharma was appointed by the Governor to fill a partial term as a judge of the 8th District Court. In the November 2022 general election, Judge Sharma was elected to fill the remainder of that term, expiring on January 1, 2027. Pursuant to a concurrent jurisdiction plan adopted under MCL 600.401, Judge Sharma has served in the Kalamazoo Circuit Court Family Division since 2021 and has served as the presiding judge of the Family Division since 2023.

Beginning with the 2022 election, Judge Sharma hired Heather Ricketts to serve as the Treasurer of the Committee to Retain Judge Namita Sharma (Committee). Ricketts filed the Committee's Statement of Organization with the Secretary of State (SOS) Bureau of Elections (BOE) on February 15, 2022. That statement identified Ricketts as the treasurer and included only Ricketts' e-mail, mailing, and home addresses. Plaintiffs allege that unbeknownst to Judge Sharma, a reporting waiver filed by Ricketts with the BOE in 2022 was rejected and fines were imposed. Ricketts then allegedly filed campaign statements in July and October 2023 and January 2024 without advising Judge Sharma. In January 2025, Ricketts allegedly filed a second reporting waiver without notifying Judge Sharma. Plaintiffs allege that in December 2025, Judge Sharma contacted Ricketts via text message and advised that she planned to file her joint Affidavit of Identity (AOI) and Affidavit of Candidacy (AOC) (collectively "Affidavit") the following month to initiate her candidacy for the 2026 election. Ricketts allegedly "told Judge Sharma to go ahead and file."

On January 8, 2026, Judge Sharma filed her Affidavit, which included her personal mailing and e-mail addresses. The Affidavit identified Judge Sharma as an incumbent 8th District Court

Judge running for reelection. She attested, "At this date, all statements, reports, late filing fees, and fines due from me or any candidate committee organized to support my election under the Michigan Campaign Finance Act have been filed or paid."

Five months later, on May 14, 2026, BOE Director Jonathan Brater notified Judge Sharma that she was disqualified from appearing on the primary ballot and her candidacy would not be certified. BOE records indicated that the Committee owed $2,025 in late filing fees, and that the BOE had notified Ricketts of these deficiencies through standard mail on five occasions between August 2023 and March 2025. Director Brater cited MCL 168.558(4), which bars the BOE from certifying the candidacy of an individual who executes an AOI containing a false statement. Judge Sharma's January 8, 2026 Affidavit contained a false statement that her Committee had paid all outstanding fees, Director Brater noted, requiring disqualification under MCL 168.558(4).

Plaintiffs allege that Judge Sharma contacted Ricketts, asked her to file any outstanding reports, and she did so. Judge Sharma also paid the outstanding fees. She quickly assembled volunteers and secured 1,283 signatures on nominating petitions, over 700 more than required.

Judge Sharma notified the BOE that she planned to file a new Affidavit and nominating petitions under MCL 168.467e. On May 28, 2026, BOE Deputy Director Adam Fracassi advised Judge Sharma that if she filed nominating petitions, they would be rejected. The BOE's position was that MCL 168.467e does not apply. Section 467e states, " 'If, after the deadline for filing nominating petitions under [MCL 168.467b], there are fewer candidates for nomination or nominees for the office of judge of the district court than there are persons to be elected because of the death or disqualification of a candidate' then the filing deadline is extended and the signature thresholds are cut in half." Deputy Director Fracassi explained:

> Previously, the office designation was 2 incumbent positions and 1 nonincumbent position would appear on the November 2026 General Election ballot. Two individuals filed for the 1 nonincumbent position. With your disqualification, your seat was converted to a nonincumbent position meaning that on the November General Election ballot, there now will be 1 incumbent position and 2 nonincumbent positions. Since two individuals filed for two nonincumbent positions, there are not "fewer candidates . . . than there are persons to be elected," so therefore, 467e would not apply.

Even if MCL 168.467e did apply, Fracassi continued, the BOE would be precluded from certifying Judge Sharma's candidacy because during this election cycle she filed an AOI that contained a false statement. Fracassi cited *Martin v Secretary of State*, unpublished opinion of the Court of Appeals, issued September 7, 2022 (Docket No. 362420), pp 1-2, in which a judicial candidate was disqualified from the ballot because his March 9, 2022 AOI falsely stated that his candidate committee owed no fees. The plaintiff filed a notice of withdrawal of his candidacy on April 15, 2022, and then filed new nominating petitions and a new AOI. *Id.* at 2. The Court of Appeals held that even though the candidate withdrew his candidacy paperwork, he remained a "candidate" and the false statement in his initial AOI precluded him from running for office that cycle pursuant to MCL 168.558(4). *Id.* at 4-7.

Deputy Director Fracassi further noted that the headings on Judge Sharma's proposed nominating petitions were incorrect. They identified Judge Sharma as an incumbent, but because her incumbent candidacy had not been certified, her petitions were required to identify her as a nonincumbent.

Despite this preliminary ruling, on June 3, 2026, Judge Sharma filed a new Affidavit and her nominating petitions, seeking to run under MCL 168.467e(2). The BOE rejected these filings. Neither party has attached the communication from the BOE rejecting her filings. However,

defendants do not contest that they rejected her filing documents for the reasons stated in Deputy Director Fracassi's May 28, 2026 e-mail.

Plaintiffs—Judge Sharma and two electors from her district—filed the current complaint on June 12, 2026, raising four counts for a declaratory judgment and seeking a permanent injunction. Defendants have responded with a motion for summary disposition under MCR 2.116(C)(8).

II. CONSTITUTIONALITY OF REQUIRING AN INCUMBENT DISTRICT COURT JUDGE TO FILE AN AFFIDAVIT OF IDENTITY IN ADDITION TO AN AFFIDAVIT OF CANDIDACY

In Count I of their complaint, plaintiffs seek a declaratory judgment that Judge Sharma was only required to file an AOC, not an AOI or a combined Affidavit, to initiate her candidacy. In support of this proposition, plaintiffs cite Const 1963, art 6, § 22, which provides:

> Any judge of the court of appeals, circuit court or probate court may become a candidate in the primary election for the office of which he is the incumbent by filing an *affidavit of candidacy* in the form and manner prescribed by law. [Emphasis added.]

Citing a delegate from the 1961-1962 Constitutional Convention, plaintiffs argue that Const 1963, art 6, § 22 was intended to simplify the process for incumbent judges to file for reelection, limiting the Legislature's authority to setting the time and place for filing. An incumbent district court judge is not included in this constitutional provision. Even so, plaintiffs contend it applies to Judge Sharma because she has served as a de jure and de facto circuit court judge since 2021.

In response to defendants' motion for summary disposition, plaintiffs also contend that the Purity of Elections Clause of Const 1963, art 2, § 4(2) requires defendants to certify any incumbent judicial candidate after filing only an AOC, even an incumbent district court judge. Plaintiffs

argue that the Purity of Elections Clause requires that "all candidates be treated equally." Const 1963, art 2, § 4(2) states, in relevant part:

> Except as otherwise provided in this constitution or in the constitution or laws of the United States *the legislature shall enact laws* to regulate the time, place and manner of all nominations and elections, *to preserve the purity of elections*, to preserve the secrecy of the ballot, to guard against abuses of the elective franchise, and to provide for a system of voter registration and absentee voting. [Emphasis added.]

Plaintiffs similarly argue that Judge Sharma's incumbency designation is a substantial right and benefit and that defendants' "construction of the election law unconstitutionally denied Judge Sharma the benefits of her incumbency."

Defendants contend that plaintiffs' reliance on Const 1963, art 6, § 22 is misplaced because by its plain language, § 22 does not apply to district court judges. Even if § 22 prevented the Legislature from requiring these judicial candidates to file an AOI (which defendants do not concede), Judge Sharma would still be required to file an AOI. Defendants assert that "exercising the power and jurisdiction of the circuit court as permitted by statute does not change the name or nature of the office to which [Judge Sharma] was elected and presently holds."

The Court concludes that the drafters of the 1963 Constitution treated district court judges differently from judges of the Court of Appeals, circuit courts, and probate courts for a reason. Const 1963, art 6, § 1 vests the judicial power "in one court of justice" comprised of the Supreme Court, the Court of Appeals, the circuit courts, the probate courts, and "courts of limited jurisdiction that the legislature may establish by a two-thirds vote." The district courts are such courts of limited jurisdiction and were established by the Legislature through the enactment of MCL 600.8101 in 1968, five years after the current Constitution was ratified. While Const 1963, art 6, § § 11-13 describe the authority of circuit courts and circuit court judges and § § 15-16 do

the same for probate courts and probate court judges, the Constitution is silent regarding the district courts. Instead, the qualifications and duties of the district court judges and other general guidelines for the operation of the district courts are found in MCL 600.8201 *et seq*. As the district courts were not established in the Constitution and were established by the Legislature five years later, it follows that the AOC rule of Article 6, § 22 would not include incumbent district court judges.

Further, the Purity of Elections Clause does not require this Court to extend the protection of Const 1963, art 6, § 22 to district court judges. "The phrase 'purity of elections' does not have a single precise meaning. However, it unmistakably requires fairness and evenhandedness in the election laws of this state." *League of Women Voters of Mich v Secretary of State*, 333 Mich App 1, 25; 959 NW2d 1 (2020) (quotation marks and citation omitted). "[O]ne of the primary goals of election procedures is to achieve equality of treatment for all candidates whose names appear upon the ballot." *Wells v Kent Co Bd of Election Comm'rs*, 382 Mich 112, 123; 168 NW2d 222 (1969). Under this Clause, the Legislature has a duty to enact laws to preserve the purity of elections, and any law that "adversely affects the purity of elections" must be found unconstitutional. *League of Women Voters of Mich*, 333 Mich App at 25 (quotation marks and citation omitted). Plaintiffs contend that requiring any incumbent judge to file an AOI violates the purity of elections because 1) Const 1963, art 6, § 22 permits incumbent judges of the Court of Appeals, circuit courts, and probate courts to file for candidacy with just an AOC, and 2) incumbent judges of other courts must be treated equally to preserve the purity of elections.

It does not impact the purity of elections to require incumbent district court judge candidates to file an AOI. Indeed, every single candidate for state office—including incumbent

judges of the Court of Appeals, circuit courts, and probate courts—are required to file an AOI. Accordingly, every single candidate for state office is treated equally in this regard. Moreover, requiring the filing of AOIs actually furthers the goal of purity of elections. As described by the Michigan Supreme Court in *Sullivan v Secretary of State*, 373 Mich 627, 631; 130 NW2d 392 (1964): "It has been the legislature's constant purpose to insist upon full and complete identification of candidates for public office in order to provide the electorate with the information necessary to cast their ballots effectively for the candidates of their choice." The Supreme Court noted that this "purpose is evident" from several legislative enactments, including MCL 168.558's AOI requirement. *Id.*

Requiring incumbent district court judges, and indeed all incumbent judges, to file an AOI along with their AOC does not interfere with incumbent judicial candidates' substantial right to incumbency status, and the cases cited by plaintiffs do not hold otherwise. In *Burdick v Secretary of State*, 373 Mich 578; 130 NW2d 380 (1964), the Michigan Supreme Court found unconstitutional an election statute permitting appointed judges running for election for their seats to be designated as incumbents on the ballot. At that time, Mich Const 1963, art 6, § 24 stated: "There shall be printed upon the ballot under the name of each elected incumbent justice or judge who is a candidate for nomination or election to the same office the designation of that office." *Burdick*, 373 Mich at 582. The term "elected" has since been deleted from this constitutional provision. The Supreme Court did not discuss the nature of the right to be designated as an incumbent or even the right of an incumbent judge to ballot access. Rather, the Supreme Court interpreted the plain language of a constitutional provision—that only "elected incumbent" judges could be designated as an incumbent on a ballot—and concluded that a statute permitting appointed judges to also use the incumbency designation violated the Constitution.

In *Wells*, 382 Mich at 114, the plaintiff was an elected municipal court judge who was running for a newly created district court judge position. Along with creating the district courts in 1968, the Legislature enacted a statute permitting elected municipal court judges running for new district court judgeships to be designated as incumbents. *Id.* The Kent County Board of Election Commissioners, following instructions from the BOE, at that time believed this statute to be unconstitutional and declined to designate the plaintiff as an incumbent. *Id.* at 115. The Supreme Court concluded that the statute was unconstitutional because it permitted judicial candidates beyond those described in the Constitution to be designated as an incumbent. *Id.* at 126. The Court finds that *Wells* actually supports defendants' position: the Constitution does not expressly permit incumbent district court judges to file only an AOC to run for reelection and, therefore, the Legislature could not extend that right.

Plaintiffs rely upon *Feeney v Dir of the Mich Bureau of Elections*, August 24, 2020 Opinion and Order (Docket No. 20-000143-MZ). The question in *Feeney*, however, was not about ballot access, but rather the candidate's designation as an incumbent after being granted ballot access through nominating petitions following her filing of an AOC after the filing deadline for that document but before the deadline for submitting petition signatures. The question before the Court was not sufficiently similar to that before the Court now.

Plaintiffs also argue that the Legislature previously recognized its limited role in the AOC process based on the language of Const 1963, art 6, § 22. Plaintiffs cite MCL 168.467c(1), which provides:

> An incumbent district court judge may become a candidate in the primary election for the office of which he or she is an incumbent by filing with the [SOS] an [AOC] in lieu of nominating petitions not less than 134 days before the date of the primary election. . . . The [AOC] must contain statements that the affiant is an

> incumbent district court judge for the district or election division in which election is sought, that he or she is domiciled within the district or election division, and that he or she will not attain the age of 70 by the date of election, and a declaration that the affiant is a candidate for election to the office of district court judge.

It should be noted, however, that the Legislature included identical language regarding incumbent circuit court judge candidates in MCL 168.413a, incumbent probate court judges in MCL 168.433a, incumbent Court of Appeals judges in MCL 168.409b(6), and even incumbent Supreme Court justices in MCL 168.392a. None of these statutes have ever been interpreted as preventing the Legislature from also requiring these incumbent candidates to also file an AOI or from requiring the SOS not to certify an incumbent judicial candidate who includes a false statement in his or her AOI under MCL 168.558.[1]

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[1] MCL 168.558 states, in relevant part:

> (1) When filing a nominating petition, qualifying petition, filing fee, or *[AOC]* for a federal, county, state, city, township, village, metropolitan district, or school district office in any election, *a candidate shall file with the officer with whom the petitions, fee, or affidavit is filed 2 copies of an [AOI]*. . . .
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> * * *
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> (4) An [AOI] must include a signed and notarized statement that as of the date of the affidavit, all statements, reports, late filing fees, and fines required of the candidate or any candidate committee organized to support the candidate's election under the Michigan campaign finance act, 1976 PA 388, MCL 169.201 to 169.282, have been filed or paid; and a statement that the candidate acknowledges that making a false statement in the affidavit is perjury, punishable by a fine up to $1,000.00 or imprisonment for up to 5 years, or both. . . . An officer shall not certify to the board of election commissioners the name of a candidate who fails to comply with this section, or the name of a candidate who executes an [AOI] that contains a false statement with regard to any information or statement required under this section. [Emphasis added.]

Ultimately, the Court is not persuaded by any of plaintiffs' arguments to conclude that the Legislature could not require Judge Sharma to file anything other than an AOC in support of her candidacy. Judge Sharma was required by MCL 168.558(1) to file an AOI to properly seek her candidacy.

III. DEFENDANTS WERE NOT REQUIRED TO ACCEPT JUDGE SHARMA'S JUNE 3, 2026 AFFIDAVIT

In Count II, plaintiffs seek a declaratory judgment that, in the event this Court upholds the AOI requirement, defendants were required to accept Judge Sharma's new Affidavit filed on June 3, 2026. Judge Sharma alleges that "the BOE has refused to accept her new AOI claiming that MCL 168.558(4) imposes a bar for the entire election cycle on her filing an AOI for any office because of the previously filed defective AOI." This interpretation of MCL 168.558(4) to impose a ban on a judicial incumbent's access to the ballot, plaintiffs contend, violates Const 1963, art 6 generally and more specifically § § 22 and 24.[2]

Defendants contend that it is required by the plain language of MCL 168.558(4) and case law of the Court of Claims and Court of Appeals to preclude candidates from curing a false or deficient AOI by submitting a new AOI.

First, MCL 168.558(4) states that "[a]n officer *shall not* certify to the board of election commissioners the name of a candidate who fails to comply with this section, or the name of a candidate who executes an [AOI] that contains a false statement with regard to any information or

[2] Const 1963, art 6, § 24 states, "There shall be printed upon the ballot under the name of each incumbent justice or judge who is a candidate for nomination or election to the same office the designation of that office."

statement required under this section." (Emphasis added.) This is a mandatory provision. The Court of Appeals held in *Moore v Genesee Co*, 337 Mich App 723, 729-730; 976 NW2d 921 (2021): "Candidate applicants must strictly comply with the preelection form and content requirements identified in the Michigan Election Law, which includes supplying a facially proper [AOI]." (Cleaned up.) Moreover, "There is simply no statutory provision for amending an AOI after the deadline has passed." *Id.* at 732. Similarly, in *Martin*, (COA Docket No. 362420), the plaintiff could not cure a deficient or false AOI by withdrawing his candidacy and refiling. The individual remained a candidate and could not start afresh.

Here, Judge Sharma became a candidate when she filed her Affidavit which falsely stated that her Committee had paid all outstanding fees and fines. She was disqualified because of this false statement but remained a "candidate" under the law. Therefore, she could not remedy the false statement in her Affidavit by paying her fees and then filing a new Affidavit and nominating petitions. Defendants could not certify her candidacy under MCL 168.558(4).[3]

IV. THE RIGHTS OF THE ELECTORATE ARE NOT HARMED

In Count IV, plaintiffs seek a declaratory judgment that the denial of Judge Sharma's access to the ballot violates the rights of the electorate to cast meaningful and effective votes and to associate for the advancement of their beliefs. As recently stated by this Court in *Davis v Benson*, June 11, 2026 Opinion and Order (Docket No. 26-000091-MB), pp 2-3:

[3] Because the Court concludes that Judge Sharma's false statement in her AOI prevented defendants from certifying her candidacy, the Court need not consider plaintiffs' claim in Count III that defendants were required to accept Judge Sharma's nominating petitions for filing.

> The Michigan Constitution provides that "[a]ll political power is inherent in the people," and that "[g]overnment is instituted for their equal benefit, security and protection." Const 1963, art 1, § 1. The most basic and fundamental right allowing the people to exercise their political power is the right to vote. "[T]he right to vote is an implicit fundamental political right that is preservative of all rights." *In re Request for Advisory Opinion Regarding Constitutionality of 2005 PA 71*, 479 Mich 1, 16; 740 NW2d 444 (2007) (quotation marks and citation omitted). "[T]he rights of voters and the rights of candidates do not lend themselves to neat separation; laws that affect candidates always have at least some theoretical, correlative effect on voters. The voters' rights are thus burdened by the exclusion of candidates from office." *People v Smith*, 502 Mich 624, 637; 918 NW2d 718 (2018) (quotation marks and citations omitted).

This Court similarly reasoned in *Thomas v Mich Bureau of Elections*, June 4, 2026 Opinion and Order (Docket No. 26-000113-MZ), p 6:

> "[T]he rights of voters and the rights of candidates do not lend themselves to neat separation; laws that affect candidates always have at least some theoretical, correlative effect on voters. Our primary concern is with the tendency of ballot access restrictions to limit the field of candidates from which voters might choose. Therefore, in approaching candidate restrictions, it is essential to examine in a realistic light the extent and nature of their impact on voters.
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> The impact of candidate eligibility requirements on voters implicates basic constitutional rights. . . . [I]t is beyond debate that freedom to engage in association for the advancement of beliefs and ideas is an inseparable aspect of the liberty assured by the Due Process Clause of the Fourteenth Amendment, which embraces freedom of speech. [Cleaned up, alterations added.]" [*Anderson v Celebrezze*, 460 US 780, 786-787; 103 S Ct 1564; 75 L Ed 2d 547 (1983).]

In *Davis*, Docket No. 26-000091-MB, this Court granted relief to the disqualified candidate but the situation before the Court in the current matter is very different. In *Davis*, the plaintiff, who had formerly served on the 36th District Court, sought access to the ballot. The plaintiff had been disqualified from the 2022 general election ballot for including a false statement in her AOI. During that timeframe, the Judicial Tenure Commission also investigated allegations against her. The Michigan Supreme Court did not consider the disciplinary matter until June 2023, after the plaintiff's term had expired. The Supreme Court conditionally suspended the plaintiff, indicating that she was precluded from serving as a judge for six years. The debarment from service would

be effective even if the plaintiff was elected or appointed to a judicial office during that period. In relation to the 2026 election, the plaintiff timely filed what were at least arguably compliant nominating petitions and an AOI, and she at least appears to have met the statutory and constitutional qualifications for judicial office. The SOS disqualified her from the 2026 general election ballot because in a challenge brought by a third-party in relation to that plaintiff's 2024 campaign filings, an action to which that plaintiff was not a party, a Court of Claims judge determined the SOS had a duty not to certify her candidacy. In Docket No. 26-000091-MB, after the plaintiff took the opportunity to directly challenge the candidacy certification denial, this Court determined that the SOS had a clear legal duty to review her candidacy filings because she met the judicial qualification requirements and the Supreme Court did not preclude her from running for office. The Court therefore concluded, "K. Davis and the electorate have a clear legal right to have K. Davis's name included on the 2026 general election ballot so long as K. Davis meets the constitutional judicial eligibility requirements and meets the statutory requirements to have her candidacy certified." Judge Sharma's filings did not meet the statutory requirements to have her candidacy certified.

Ultimately, a balance must be struck between the fundamental rights of the electorate and the very necessary governmental measures that must be implemented to protect the integrity of elections. As stated in *League of Women Voters of Mich v Secretary of State*, 508 Mich 520, 554-555; 975 NW2d 840 (2022):

> [S]tates maintain "considerable leeway to protect the integrity and reliability of the initiative process, as they have with respect to election processes generally." *Buckley v American Constitutional Law Foundation*, 525 US 182, 191; 119 S Ct 636; 142 L Ed 2d 599 (1999). And there is a difference between regulations that directly affect core political speech and those that simply regulate the "mechanics of the electoral process." *McIntyre v Ohio Elections Comm*, 514 US 334, 345; 115

> S Ct 1511; 131 L Ed 2d 426 (1995); see also *Buckley*, 525 US at 207-208 (THOMAS, J., concurring). "No bright line separates permissible election-related regulation from unconstitutional infringements on First Amendment freedoms," *Timmons v Twin Cities Area New Party*, 520 US 351, 359; 117 S Ct 1364; 137 L Ed 2d 589 (1997), as even structural decisions may affect an individual's right to speak and associate with others for political ends, [*Anderson*, 460 US at 788]. The Supreme Court has left the determination of the appropriate level of scrutiny open-ended, noting that there is "no substitute for the hard judgments that must be made." *Buckley*, 525 US at 192 (quotation marks and citation omitted). Where there is no severe burden on political speech or the regulation is merely one of mechanical electoral processes, courts generally apply a more flexible review such as the *Anderson-Burdick* test. This test requires a reviewing court to "weigh the character and magnitude of the burden the State's rule imposes on those rights against the interests the State contends justify that burden, and consider the extent to which the State's concerns make the burden necessary." *Timmons*, 520 US at 358 (quotation marks and citations omitted).

Requiring candidates to accurately and truthfully complete AOIs and declining to certify the candidacies of those candidates who do not meet those standards is a regulation that "is merely one of mechanical electoral processes" that does not go to the core of free speech and free association. Accordingly, this Court must "weigh the character and magnitude of the burden the State's rule imposes on those rights against the interests the State contends justify that burden, and consider the extent to which the State's concerns make the burden necessary." The United States Supreme Court noted in *Anderson*, 460 US at 788 n 9, that it had "upheld generally applicable and evenhanded restrictions that protect the integrity and reliability of the electoral process itself." As discussed above, the Michigan Supreme Court determined in *Sullivan*, 373 Mich at 631, that "[i]t has been the legislature's constant purpose to insist upon full and complete identification of candidates for public office in order to provide the electorate with the information necessary to cast their ballots effectively for the candidates of their choice." Requiring candidates to accurately and truthfully complete AOIs is a minor inconvenience to fulfill that goal. Requiring defendants not to certify the candidacy of an individual who does not accurately and truthfully complete an

AOI supports compliance with the requirement. It does not unconstitutionally burden the rights of the electorate.

Accordingly,

1. The Court GRANTS defendants' motion for summary disposition.
2. The Court DISMISSES plaintiffs' action in its entirety and with prejudice.
3. This is a final order resolving all issues in this case.

Date: June 26, 2026

James Robert Redford
Judge, Court of Claims