

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN

BAKER EVENTS, LLC; JAY CARLL; DAVID  
VANSOLKEMA; and KILEY STULLER,

Plaintiffs,

v.

**COMPLAINT**

GRETCHEN WHITMER, in her official capacity  
as Governor for the State of Michigan; DANA  
NESSEL, in her official capacity as Attorney  
General of the State of Michigan; and LISA  
STEFANOVSKY, in her official capacity as  
Health Officer, Ottawa County Department of  
Public Health,

Defendants.

Plaintiffs Baker Events, LLC, Jay Carll, David Vansolkema, and Kiley Stuller (collectively referred to as “Plaintiffs”), by and through undersigned counsel, bring this Complaint against the above-named Defendants, their employees, agents, and successors in office, and in support thereof allege the following upon information and belief:

**INTRODUCTION**

1. The “exercise of religion” embraces two concepts: the freedom to believe and the freedom to act. *Cantwell v. Conn.*, 310 U.S. 296, 303 (1940). Accordingly, “[t]he Free Exercise Clause categorically prohibits government from regulating, prohibiting, or rewarding religious beliefs as such.” *McDaniel v. Paty*, 435 U.S. 618, 626 (1978)). “The principle that government may not enact laws that suppress religious belief or practice is . . . well understood.” *Church of the Lukumi Babalu Aye, Inc. v. City of Hialeah*, 508 U.S. 520, 523 (1993).

2. As confirmed by the U.S. Supreme Court, “Business practices that are compelled or limited by the tenets of a religious doctrine fall comfortably within [the definition of ‘exercise

of religion’]. Thus, a law that ‘operates so as to make the practice of . . . religious beliefs more expensive’ in the context of business activities imposes a burden on the exercise of religion.” *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 710 (2014).

3. This civil rights action is brought under the First and Fourteenth Amendments to the United States Constitution, and 42 U.S.C. § 1983, challenging Defendant Whitmer’s executive orders as applied to prohibit the use of private property for wedding ceremonies.

4. Plaintiffs seek a declaration that the enactment and enforcement of the challenged restrictions ordered by Defendant Whitmer as set forth in this Complaint violate their fundamental liberties and rights secured by the United States Constitution and an order enjoining the same. Plaintiffs also seek an award of attorneys’ fees and costs pursuant to 42 U.S.C. § 1988, and other applicable laws.

### **JURISDICTION AND VENUE**

5. This action arises under the Constitution and laws of the United States. Jurisdiction is conferred on this Court pursuant to 28 U.S.C. §§ 1331 and 1343.

6. Plaintiffs’ claims for declaratory and injunctive relief are authorized by 28 U.S.C. §§ 2201 and 2202, by Rules 57 and 65 of the Federal Rules of Civil Procedure, by *Ex parte Young*, 209 U.S. 123 (1908), and by the general legal and equitable powers of this Court.

7. Plaintiffs’ claim for an award of their reasonable costs of litigation, including attorneys’ fees and expenses, is authorized by 42 U.S.C. § 1988 and other applicable law.

8. Venue is proper under 28 U.S.C. § 1391(b) because the Office of the Governor of Michigan, the Office of the Michigan Attorney General, and the Ottawa County Department of Public Health are located in this judicial district and all Defendants are residents of the State in which this district is located.

## **PARTIES**

9. Plaintiff Baker Events, LLC (“Baker Events”) is a family-operated Michigan limited liability company with its principal place of business in Ottawa County, Michigan. Baker Events leases and operates property located in Ottawa County that it uses for wedding ceremonies, which include wedding receptions (hereinafter referred to as the “wedding property.”).

10. Baker Events is licensed in Michigan to serve food and beverages at its wedding property.

11. Plaintiff Jay Carll is an adult citizen of the United States, a resident of Michigan, and a Christian. Plaintiff Carll is a Member of Baker Events. The corporation has only two Members: Plaintiff Jay Carll and Lisa Carll. Plaintiff Jay Carll is responsible for managing the business operations of Baker Events, including the use of the wedding property, and he has the authority to act on behalf of the company.

12. Baker Events and Plaintiff Carll have dedicated Baker Events’ wedding property for religious worship because it advances their religious belief and conviction that they should use all of their gifts, including their business interests, to advance the Kingdom. Thus, dedicating the wedding property for religious worship is a form of religious exercise for Baker Events and Plaintiff Carll.

13. Plaintiff David Vansolkema is an adult citizen of the United States, a resident of Michigan, and a Christian. Plaintiff Vansolkema is scheduled to marry Plaintiff Kiley Stuller on July 24, 2020, at the Baker Events wedding property.

14. Plaintiff Vansolkema entered into a contract with Baker Events on or about May 29, 2019, for the purpose of holding his wedding at the Baker Events wedding property.

15. Plaintiff Kiley Stuller is an adult citizen of the United States, a resident of Michigan, and a Christian.

16. As Christians, Plaintiffs Vansolkema and Stuller believe that a wedding is a sacred event where Christ is present. Plaintiffs Vansolkema and Stuller want to exercise their rights to religious freedom and expressive association by having their wedding at the Baker Events' wedding property. This is their chosen place of religious worship for their wedding.

17. Defendant Gretchen Whitmer is the Governor of the State of Michigan.

18. Under color of State law, Defendant Whitmer issued various executive orders, including Executive Order Nos. 2020-110 and 2020-143. Defendant Whitmer will continue to issue executive orders in light of the current COVID-19 pandemic and the anticipated recurrence of the spread of this virus.

19. Defendant Whitmer is sued in her official capacity only.

20. Defendant Dana Nessel is the Attorney General of Michigan. The Attorney General is the State's top law enforcement official.

21. As the Attorney General, Defendant Nessel has authority to investigate and enforce violations of Defendant Whitmer's executive orders.

22. As the Attorney General, Defendant Nessel is actively involved with investigating and enforcing violations of Defendant Whitmer's executive orders and has issued cease and desist letters to individuals and businesses that have violated these orders, threatening criminal sanctions if the individuals or businesses fail to comply.

23. Defendant Nessel is sued in her official capacity only.

24. Defendant Lisa Stefanovksy is the Health Officer for the Ottawa County Department of Public Health. As the Health Officer for the County, Defendant Stefanovsky is

responsible for enforcing Defendant Whitmer's executive orders in Ottawa County.

25. Under the supervision of Defendant Stefanovsky, the Ottawa County Department of Public Health issued a cease and desist letter to Baker Events on or about July 2, 2020, for allegedly failing to comply with Defendant Whitmer's executive orders.

26. Defendant Stefanovsky is sued in her official capacity only.

### **STATEMENT OF FACTS**

27. On June 1, 2020, Defendant Whitmer issued Executive Order 2020-110 ("EO 2020-110"), which was described as imposing a "[t]emporary restrictions on certain events, gatherings, and businesses." A true and correct copy of EO 2020-110, which is incorporated herein by reference, is attached to this Complaint as Exhibit 1.

28. On July 1, 2020, Defendant Whitmer issued Executive Order 2020-143 ("EO 2020-143"), which is described as "[c]losing indoor service at bars." A true and correct copy of EO 2020-143, which is incorporated herein by reference, is attached to this Complaint as Exhibit 2.

29. A willful violation of these executive orders is a misdemeanor. Also, a violation of these orders could result in civil citations and penalties and the suspension of a violator's business licenses.

30. Pursuant to EO 2020-110, "Indoor social gatherings and events among persons not part of a single household are permitted, but may not exceed 10 people."

31. Pursuant to EO 2020-110, "Outdoor social gatherings and events among persons not part of a single household are permitted, but only to the extent that: (a) The gathering or event does not exceed 100 people, and (b) People not part of the same household maintain six feet of distance from one another."

32. Consistent with prior executive orders, EO 2020-110 expressly states that “nothing in this order shall be taken to abridge protections guaranteed by the state or federal constitution under these emergency circumstances.”

33. Three days after she issued EO 2020-110, Defendant Whitmer promoted and even participated in an outdoor social gathering that far exceeded 100 persons. When questioned about her decision to march “shoulder to shoulder” with “hundreds of” protesters—conduct prohibited under EO 2020-110 even for outdoor gatherings—Defendant Whitmer’s spokesperson explained that this social gathering did not violate the executive order because “[n]othing in th[e] order . . . abridge[s] protections guaranteed by the state or federal constitution.”

34. Beyond her personal participation in these social gatherings, Defendant Whitmer allowed protestors to assemble in large groups of well over 100 persons for nearly the entire month of June.

35. Consequently, Defendant Whitmer is willing to allow spontaneous, uncontrolled, and large social gatherings promoting one type of message, while prohibiting Plaintiffs’ organized weddings, even though the weddings, unlike the permitted protests, would be carried out with significant health and safety measures.

36. Additionally, EO 2020-110 expressly states, “Consistent with prior guidance, neither a place of religious worship nor its owner is subject to penalty under section 19 of this order for allowing religious worship at such place. No individual is subject to penalty under section 19 of this order for engaging in religious worship at a place of religious worship, or for violating the face covering requirement of section 4(b) of this order.”

37. In prior litigation challenging provisions of Defendant Whitmer’s executive orders, Defendant Whitmer stipulated to a court-signed order providing that the “place of

religious worship” exception applies to religious gatherings by family members at a private residence. A true and correct copy of this order (“Stipulated Order Resolving Plaintiffs’ Motion for Temporary Restraining Order and Preliminary Injunction”), which is incorporated herein by reference, is attached to this Complaint as Exhibit 3.

38. The wedding property leased by Baker Events is principally a venue for holding weddings. A wedding is a form of religious worship.

39. Baker Events has a food service license (license no. SFE4170078192). This license allows Baker Events to prepare and serve food on-site during the weddings.

40. Baker Events subcontracts with Gilmore Collection for food and alcohol services. When patrons would like to have alcohol at their wedding, they may do so as Gilmore Collection has the right under its “catering permit,” which is authorized by M.C.L. § 436.1547 of the Michigan Liquor Control Act, to serve alcohol. Accordingly, Baker Events’ patrons contract with Gilmore Collection separately regarding the food and beverage. Baker Events requires this in its contract, as only Gilmore Collection is permitted to serve food and alcohol at Baker Events—Baker Events provides the space for the wedding.

41. Baker Events’ wedding property is located at 217 East 24th Street in Holland, Michigan, and it consists of two indoor spaces (one on the main level and one on the second level).

42. The space on the main level of the building is 5,800 square feet. There is an additional 2,000 square feet of kitchen and service area space. The capacity for the main level space is 380 people. There is also a 1,500 square foot outdoor patio that is connected to the main level space.

43. The second level space is 4,600 square feet and has a capacity of 240 people.

44. Baker Events has installed three air purifiers in the main level space and two air purifiers in the second level space. The air purifiers are the recommended size to purify the air in the space seven times an hour.

45. Baker Events has installed multiple sanitation stations throughout each space. It has eliminated buffet style dinners, and all of its staff wear gloves and face masks, and they undergo temperature checks prior to working.

46. Baker Events has implemented social distancing and mask-wearing protocols consistent with the guidance issued by the Centers for Disease Control and Prevention (CDC), and they communicate these requirements to those who attend the wedding events. The Baker Events' staff enforces these requirements at all weddings.

47. Prior to having their indoor events shut down by the Ottawa County Department of Public Health, Baker Events operated at 50% capacity, which is the guideline for "restaurants . . . and like places" under the operative executive orders. Under these guidelines, Baker Events could host a wedding with 190 people in the main level space and a wedding of 120 people in the second level space.

48. Additionally, Baker Events has setup a tent outside its building, and Plaintiff Carll was informed by the Ottawa County Department of Public Health that they can have 100 people under the tent for weddings, including ceremonies and receptions. The tent is less than ideal because it greatly limits the number of persons who can attend the wedding, and it does not protect the wedding guests from adverse weather, including driving rain and hot and cold temperatures.

49. On July 1, 2020, the Ottawa Department of Public Health issued guidance on the enforcement of Defendant Whitmer's executive orders titled, "Social Gatherings and Event



Limitations” (“ODPH Guidance”). A true and correct copy of the ODPH Guidance, which is incorporated herein by reference, is attached to this Complaint as Exhibit 4.

50. Pursuant to the ODPH Guidance:

Social gatherings and organized events include any organized events among persons not part of the same household (e.g. weddings, rehearsal dinner, charity dinners, dances, etc.). These are organized events traditionally held at banquet halls, event spaces, or other locations within the community. They are considered social gatherings and are not regular bar and restaurant operations. Holding banquets and events does not align with the Phase 4 requirements of small gatherings to prevent the spread of COVID-19.

51. On or about July 2, 2020, Andrew Priest, Environmental Health Specialist at the Ottawa Department of Public Health, contacted Baker Events to inform it that no weddings (ceremonies or receptions) could take place on the wedding property if there were more than 10 people present. At around the same time, Mr. Priest emailed a copy of a Cease and Desist Order issued by the Ottawa Department of Public Health to Baker Events. A true and correct copy of the “Cease and Desist Order” (“Order”), which is incorporated herein by reference, is attached to this Complaint as Exhibit 5.

52. The Order states, in part, that “[y]our facility may not operate as a restaurant/bar. Events indoors that do not meet the Governor’s Executive Orders, such as large indoor weddings and parties are not permitted at this time. The 50% limit for operations only applies to seating at restaurants and bars.”

53. The Order warns that “[f]ailure to comply will result in civil citations and/or the suspension of your food service license until you can demonstrate compliance with Executive Orders.”

54. Consequently, restaurants and bars, which are not engaging in religious worship, are being treated more favorably than Baker Events’ weddings. Indeed, even though places

engaging in religious worship are exempt from the executive orders, Baker Events' weddings could nonetheless comply with the requirements for secular "food service establishments" as set forth in paragraph 2 of EO 2020-143, but the Order prohibits Baker Events' weddings even if they complied with these requirements.

55. Upon receiving the Order, Baker Events' General Counsel, Mr. Donald R. Sheff II, called Ms. Adeline Hambley, Environmental Health Manager at the Ottawa Department of Public Health, to discuss the Health Department's interpretation of the executive orders and the application of these orders to Baker Events' weddings. Ms. Hambley informed Mr. Sheff that the Order was issued without review by the County's Corporation Counsel, and she agreed that Baker Events could hold its one wedding event scheduled for July 3, 2020, and that the Order would not apply to this event. Ms. Hambley said that she would review the issue with Corporation Counsel and get back with Baker Events the following week.

56. On or about July 7, 2020, Mr. Douglas W. Van Essen, Ottawa County Corporation Counsel, contacted Mr. Sheff via telephone, informing Mr. Sheff that the Ottawa Department of Public Health was prohibiting Baker Events' weddings because they were "indoor social gatherings" under paragraph 5 of EO 2020-110. He said that any of Baker Events' outdoor activities would be regulated under paragraph 6 of EO 2020-110. Mr. Sheff asked Mr. Van Essen to square that with paragraph 13 of EO 2020-110 (the regulations for "restaurants . . . and like places") and paragraph 2 of EO 2020-143 (the regulations for "food service establishments"). Mr. Van Essen could not reconcile the apparent contradiction and simply responded by stating that Baker Events was engaging in "social gatherings."

57. On or about July 8, 2020, Mr. Sheff contacted Mr. Van Essen via telephone, asking if he could follow up with more detailed questions so that Baker Events could better

understand the Ottawa Department of Public Health's interpretation of the executive orders. Mr. Van Essen agreed, so Mr. Sheff sent him an email in an effort to seek further clarification.

58. Mr. Van Essen responded to Mr. Sheff via email in relevant part as follows:

2. A wedding reception is NOT a religious worship activity; it is a social gathering.

3. A wedding ceremony—even if a minister is involved, is not a religious worship service as those terms are used by the Governor. While Catholic weddings may involve a mass, which is a worship service, Catholic weddings must take place in a sanctified church and could not be held at Baker Events. [I graduated from ND Law School].

59. Frustrated by Ottawa County's demonstrably false view of what constitutes religious worship, Baker Events and Plaintiff Carll, through Baker Events' General Counsel, proposed a resolution ("Freedom of Worship Resolution") to the Ottawa County Board of Commissioners in order to protect religious freedom within the County. The resolution was sent to the Board on or about July 13, 2020, for the Board to consider at its next meeting scheduled for July 14, 2020. A true and correct copy of the Freedom of Worship Resolution, which is incorporated herein by reference, is attached to this Complaint as Exhibit 6. The Chairman of the Board refused to place the proposed resolution on the Board's agenda.

60. Contrary to Ottawa County's view, weddings are religious worship. Baker Events' wedding property is, properly understood, a place of religious worship, particularly when it is hosting the celebration of the sacrament of marriage.

61. Christians believe that God himself is the author of marriage. The vocation to marriage is written in the very nature of man and woman as they came from the hand of the Creator. Marriage is not a purely human institution despite the many variations it may have undergone through the centuries in different cultures, social structures, and spiritual attitudes.

62. The sacred and thus religious aspect of a wedding is not limited to just the exchange of vows between the bride and the groom. While the ceremony itself is obviously the central focus of a wedding, the wedding banquet is an integral component of this religious event. Sacred Scripture often uses the image of a wedding banquet to describe the Kingdom of heaven. Sacred Scripture begins with the creation of man and woman in the image and likeness of God and concludes with a vision of “the wedding-feast of the Lamb.”

63. In Matthew 22:1-14, Jesus compares the Kingdom of heaven to a wedding feast.

64. Revelation 19:7-9 refers to the “wedding day of the Lamb,” stating further, “Blessed are those who have been called to the wedding feast of the Lamb.”

65. On the threshold of his public life, Jesus performs his first miracle (turning water into wine for the guests)—at his mother’s request—during a wedding feast. The Christian community attaches great importance to Jesus’ presence at the wedding at Cana. Christians see it as the confirmation of the goodness of marriage and the proclamation that henceforth marriage will be an efficacious sign of Christ’s presence.

66. Since marriage establishes the couple in a public state of life in the Church, it is fitting that its celebration be public.

67. Jesus taught that where two or more gather in His name, He is present. (Matthew 18:20). At a Christian wedding, individuals gather in the name of Christ, thereby blessing the gathering with His presence.

68. Indeed, a wedding is not merely a “social gathering,” such as attending a sporting event, going to a bar or restaurant with friends, watching a movie at a theater, or engaging in some other form of entertainment. A wedding is a sacred event that is protected by the First Amendment. Those who attend a wedding are more than spectators—they are witnesses who

solemnize this public event by their presence and are thus expressing their approval of this event by attending. Consequently, those who are present at a wedding, particularly the bride and groom, are engaging in a form of expressive association that is grounded in religious belief and Sacred Scripture.

69. Additionally, weddings are different from other public “social gatherings” in that the majority of the guests are typically family and friends. Consequently, and as just one example, Plaintiffs Vansolkema and Stuller currently have 170 guests that plan on attending their wedding at the Baker Events wedding property (which is currently prohibited, whether indoors or outdoors). These 170 guests, however, consist of only 50 households. Social distancing requirements apply by household, not simply by individuals. Under the Ottawa Department of Public Health’s enforcement of the executive orders, 100 unrelated individuals from separate households are permitted to gather socially outdoors for a secular event, but Plaintiffs Vansolkema and Stuller are not permitted to have 50 households at their religious event.

70. Currently, Baker Events has 134 weddings booked for the remainder of the year. There have been approximately 24 weddings cancelled and 51 postponed to date. Should Defendants continue to impose their restrictions and prohibition on the weddings hosted at Baker Events’ wedding property, the cancellations will increase exponentially, causing serious harm to Baker Events and Plaintiff Carll.

71. Plaintiffs Vansolkema and Stuller want to hold their wedding ceremony and reception indoors at the wedding property, as was their desire and plan when Plaintiff Vansolkema entered into the contract with Baker Events in May 2019. Plaintiffs Vansolkema and Stuller also want to have their 170 guests present as witnesses to this sacred event. However, as a result of Defendant Whitmer’s executive orders and the application and

enforcement of these orders by the Ottawa Department of Public Health, Plaintiffs Vansolkema and Stuller are unable to do so, causing them irreparable harm.

72. Baker Events and Plaintiff Carll want to continue providing their wedding property as a place of religious worship for those seeking a venue for their weddings. However, as a result of Defendant Whitmer's executive orders and the application and enforcement of these orders by the Ottawa Department of Public Health, Baker Events and Plaintiff Carll are unable to do so, causing them irreparable harm.

### **FIRST CLAIM FOR RELIEF**

#### **(First Amendment—Free Exercise of Religion)**

73. Plaintiffs hereby incorporate by reference all stated paragraphs.

74. By reason of the aforementioned acts, policies, practices, procedures, and/or customs, created, adopted, and enforced under color of State law, Defendants have deprived Plaintiffs of their right to the free exercise of religion in violation of the First Amendment as applied to the states and their political subdivisions under the Fourteenth Amendment to the United States Constitution and 42 U.S.C. § 1983.

75. As set forth in this Complaint, the challenged restrictions on Plaintiffs' right to engage in religious worship are not neutral laws of general applicability in that they discriminate against Plaintiffs' religious worship.

76. As set forth in this Complaint, the challenged restrictions favor secular establishments, such as restaurants, over Baker Events' and Plaintiff Carll's use of their property for religious worship.

77. As a direct and proximate result of Defendants' violation of the First Amendment as set forth in this Complaint, Plaintiffs have suffered irreparable harm, including the loss of their fundamental constitutional rights, entitling them to declaratory and injunctive relief.

## **SECOND CLAIM FOR RELIEF**

### **(Equal Protection—Fourteenth Amendment)**

78. Plaintiffs hereby incorporate by reference all stated paragraphs.

79. By reason of the aforementioned acts, policies, practices, procedures, and/or customs, created, adopted, and enforced under color of State law, Defendants have deprived Plaintiffs of the equal protection of the law guaranteed under the Equal Protection Clause of the Fourteenth Amendment to the United States Constitution and 42 U.S.C. § 1983.

80. As set forth in this Complaint, the challenged restrictions deprive Plaintiffs of their fundamental rights and freedom, yet the orders provide exceptions for other activity and conduct that is similar in its impact and effects. The challenged restrictions lack any rational basis, are arbitrary, capricious, and vague, have no real or substantial relation to the objectives of the orders, and are a palpable invasion of rights secured by fundamental law in violation of the Equal Protection Clause.

81. When the government treats an individual disparately as compared to similarly situated persons and that disparate treatment burdens a fundamental right, targets a suspect class, or has no rational basis, such treatment violates the equal protection guarantee of the Fourteenth Amendment. As set forth in this Complaint, the challenged restrictions violate the equal protection guarantee of the Fourteenth Amendment.

82. As set forth in this Complaint, the challenged restrictions are being applied unequally based on the nature of the expressive conduct at issue in violation of the Fourteenth Amendment.

83. As a direct and proximate result of Defendants' violation of the equal protection guarantee of the Fourteenth Amendment as set forth in this Complaint, Plaintiffs have suffered irreparable harm, including the loss of their fundamental constitutional rights, entitling them to declaratory and injunctive relief.

### **THIRD CLAIM FOR RELIEF**

#### **(Due Process—Fourteenth Amendment)**

84. Plaintiffs hereby incorporate by reference all stated paragraphs.

85. By reason of the aforementioned acts, policies, practices, procedures, and/or customs, created, adopted, and enforced under color of State law, Defendants have deprived Plaintiffs of their right to due process in violation of the Fourteenth Amendment to the United States Constitution and 42 U.S.C. § 1983.

86. The challenged restrictions, as set forth in this Complaint, lack any rational basis, are arbitrary, capricious, and vague, have no real or substantial relation to the objectives of the orders, and are a palpable invasion of rights secured by fundamental law in violation of the Due Process Clause of the Fourteenth Amendment.

87. Defendants' actions, as set forth in this Complaint, deprived Baker Events and Plaintiff Carll of the use and enjoyment of their property for religious purposes without due process in violation of the Fourteenth Amendment.

88. The challenged restrictions, as set forth in this Complaint, are unconstitutionally vague because they fail to provide clear notice as to which gatherings are permissible and which



are not. The ambiguity in the restrictions as to what types of First Amendment-protected activity are allowed have and will continue to have a chilling effect on religious exercise and expressive association. The restrictions' ambiguity also invites discriminatory enforcement against disfavored individuals and groups.

89. Accordingly, the challenged restrictions violate the Due Process Clause of the Fourteenth Amendment because they are impermissibly vague, fail to give fair notice of the conduct that is required or prescribed, fail to provide minimal guidelines to govern law enforcement, and encourage arbitrary enforcement.

90. As a direct and proximate result of Defendants' violation of the Fourteenth Amendment as set forth in this Complaint, Plaintiffs have suffered irreparable harm, including the loss of their fundamental constitutional rights, entitling them to declaratory and injunctive relief.

#### **FOURTH CLAIM FOR RELIEF**

##### **(First Amendment—Right of Association)**

91. Plaintiffs hereby incorporate by reference all stated paragraphs.

92. By reason of the aforementioned acts, policies, practices, procedures, and/or customs, created, adopted, and enforced under color of State law, Defendants have deprived Plaintiffs of their right of association in violation of the First and Fourteenth Amendments to the United States Constitution and 42 U.S.C. § 1983.

93. The freedom to engage in association for the advancement of beliefs and ideas is an inseparable aspect of freedom of speech. Indeed, implicit in the right to engage in activities protected by the First Amendment is a corresponding right to associate with others in pursuit of a wide variety of political, social, economic, educational, religious, and cultural ends.

94. A wedding is a form of expressive association.

95. As set forth in this Complaint, the challenged restrictions are being applied unequally based on the nature of the expressive conduct at issue in violation of the First Amendment.

96. As a direct and proximate result of Defendants' violation of the right to association under the First and Fourteenth Amendments as set forth in this Complaint, Plaintiffs have suffered irreparable harm, including the loss of their fundamental constitutional rights, entitling them to declaratory and injunctive relief.

### **FIFTH CLAIM FOR RELIEF**

#### **(First Amendment—Freedom of Speech)**

97. Plaintiffs hereby incorporate by reference all stated paragraphs.

98. By reason of the aforementioned acts, policies, practices, procedures, and/or customs, created, adopted, and enforced under color of State law, Defendants have deprived Plaintiffs of their right to freedom of speech in violation of the First and Fourteenth Amendments to the United States Constitution and 42 U.S.C. § 1983.

99. A wedding is a form of expressive conduct. It is religious speech.

100. Baker Events has the same food service license required for restaurants. However, because it is hosting a wedding rather than a random group of dinner customers, its conduct is prohibited. Accordingly, because Plaintiffs declared their intention to engage in expressive conduct, Defendants have imposed regulatory burdens on Plaintiffs that would not be applicable to other food service licensees.

101. The challenged restrictions operate as a content-based restriction on Plaintiffs' expressive conduct. Accordingly, as set forth in this Complaint, the challenged restrictions are

being applied unequally based on the content of the expressive conduct at issue in violation of the First Amendment.

102. As a direct and proximate result of Defendants' violation of the right to freedom of speech under the First Amendment as set forth in this Complaint, Plaintiffs have suffered irreparable harm, including the loss of their fundamental constitutional rights, entitling them to declaratory and injunctive relief.

### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs ask this Court:

- A) to declare that Defendants violated Plaintiffs' fundamental constitutional rights as set forth in this Complaint;
- B) to enjoin Defendants' enforcement of the challenged restrictions as set forth in this Complaint;
- C) to award Plaintiffs their reasonable attorneys' fees, costs, and expenses pursuant to 42 U.S.C. § 1988 and other applicable law;
- D) to grant such other and further relief as this Court should find just and proper.

Respectfully submitted,

AMERICAN FREEDOM LAW CENTER

/s/ Robert J. Muise

Robert J. Muise, Esq. (P62849)

PO Box 131098

Ann Arbor, Michigan 48113

Tel: (734) 635-3756; Fax: (801) 760-3901

rmuise@americanfreedomlawcenter.org

David Yerushalmi, Esq. (Ariz. Bar No. 009616;  
DC Bar No. 978179; Cal. Bar No. 132011;  
NY Bar No. 4632568)  
1901 Pennsylvania Avenue NW, Suite 201  
Washington, D.C. 20006  
Tel: (646) 262-0500; Fax: (801) 760-3901  
dyerushalmi@americanfreedomlawcenter.org

*Attorneys for Plaintiffs*

# EXHIBIT 1



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
OFFICE OF THE GOVERNOR  
LANSING

GARLIN GILCHRIST II  
LT. GOVERNOR

## EXECUTIVE ORDER

No. 2020-110

### Temporary restrictions on certain events, gatherings, and businesses

#### Rescission of Executive Orders 2020-69 and 2020-96

The novel coronavirus (COVID-19) is a respiratory disease that can result in serious illness or death. It is caused by a new strain of coronavirus not previously identified in humans and easily spread from person to person. There is currently no approved vaccine or antiviral treatment for this disease.

On March 10, 2020, the Department of Health and Human Services identified the first two presumptive-positive cases of COVID-19 in Michigan. On that same day, I issued Executive Order 2020-4. This order declared a state of emergency across the state of Michigan under section 1 of article 5 of the Michigan Constitution of 1963, the Emergency Management Act, 1976 PA 390, as amended (EMA), MCL 30.401 et seq., and the Emergency Powers of the Governor Act of 1945, 1945 PA 302, as amended (EPGA), MCL 10.31 et seq.

Since then, the virus spread across Michigan, bringing deaths in the thousands, confirmed cases in the tens of thousands, and deep disruption to this state's economy, homes, and educational, civic, social, and religious institutions. On April 1, 2020, in response to the widespread and severe health, economic, and social harms posed by the COVID-19 pandemic, I issued Executive Order 2020-33. This order expanded on Executive Order 2020-4 and declared both a state of emergency and a state of disaster across the State of Michigan under section 1 of article 5 of the Michigan Constitution of 1963, the Emergency Management Act, and the Emergency Powers of the Governor Act of 1945. And on April 30, 2020, finding that COVID-19 had created emergency and disaster conditions across the State of Michigan, I issued Executive Order 2020-67 to continue the emergency declaration under the Emergency Powers of the Governor Act, as well as Executive Order 2020-68 to issue new emergency and disaster declarations under the Emergency Management Act.

Those executive orders have been challenged in *Michigan House of Representatives and Michigan Senate v Whitmer*. On May 21, 2020, the Court of Claims ruled that Executive Order 2020-67 is a valid exercise of authority under the Emergency Powers of the Governor Act but that Executive Order 2020-68 is not a valid exercise of authority under the Emergency Management Act. Both of those rulings are being challenged on appeal.

On May 22, 2020, I issued Executive Order 2020-99, again finding that the COVID-19 pandemic constitutes a disaster and emergency throughout the State of Michigan. That order constituted a state of emergency declaration under the Emergency Powers of the Governor Act of 1945. And, to the extent the governor may declare a state of emergency and a state of disaster under the Emergency Management Act when emergency and disaster conditions exist yet the legislature has declined to grant an extension request, that order also constituted a state of emergency and state of disaster declaration under that act.

The Emergency Powers of the Governor Act provides a sufficient legal basis for issuing this executive order. In relevant part, it provides that, after declaring a state of emergency, “the governor may promulgate reasonable orders, rules, and regulations as he or she considers necessary to protect life and property or to bring the emergency situation within the affected area under control.” MCL 10.31(1).

Nevertheless, subject to the ongoing litigation and the possibility that current rulings may be overturned or otherwise altered on appeal, I also invoke the Emergency Management Act as a basis for executive action to combat the spread of COVID-19 and mitigate the effects of this emergency on the people of Michigan, with the intent to preserve the rights and protections provided by the EMA. The EMA vests the governor with broad powers and duties to “cop[e] with dangers to this state or the people of this state presented by a disaster or emergency,” which the governor may implement through “executive orders, proclamations, and directives having the force and effect of law.” MCL 30.403(1)–(2). This executive order falls within the scope of those powers and duties, and to the extent the governor may declare a state of emergency and a state of disaster under the Emergency Management Act when emergency and disaster conditions exist yet the legislature has not granted an extension request, they too provide a sufficient legal basis for this order.

To suppress the spread of COVID-19, to prevent the state’s health care system from being overwhelmed, to allow time for the production of critical test kits, ventilators, and personal protective equipment, to establish the public health infrastructure necessary to contain the spread of infection, and to avoid needless deaths, it was reasonable and necessary to direct residents to remain at home or in their place of residence to the maximum extent feasible. To that end, on March 23, 2020, I issued Executive Order 2020-21, ordering all people in Michigan to stay home and stay safe. In Executive Orders 2020-42, 2020-59, 2020-70, 2020-77, 2020-92, and 2020-96, I extended that initial order, modifying its scope as needed and appropriate to match the ever-changing circumstances presented by this pandemic.

The measures put in place by these executive orders have been effective: the number of new confirmed cases each day continues to drop. Although the virus remains aggressive and persistent—on May 31, 2020, Michigan reported 57,397 confirmed cases and 5,491 deaths—the strain on our health care system has begun to relent, even as our testing capacity has increased. We are now in the process of gradually resuming in-person work and activities. In so doing, however, we must move with care, patience, and vigilance, recognizing the grave harm that this virus continues to inflict on our state and how quickly our progress in suppressing it can be undone.

With this order, I find it reasonable and necessary to move the state to Stage 4 of the Michigan Safe Start Plan. As a result, Michiganders are no longer required to stay home. Instead, certain businesses will remain closed and specific activities that present a

heightened risk of infection will remain prohibited. Any work that is capable of being performed remotely must be performed remotely.

Under this order, retailers will be allowed to resume operations on June 4. Restaurants and bars may reopen fully on June 8. Swimming pools and day camps for kids will also be permitted to reopen on the same day. Those businesses and activities will be subject to safety guidance to mitigate the risk of infection. Other businesses and activities that necessarily involve close contact and shared surfaces, including gyms, hair salons, indoor theaters, tattoo parlors, casinos, and similar establishments, will remain closed for the time being.

Michiganders must continue to wear face coverings when in enclosed public spaces and should continue to take all reasonable precautions to protect themselves, their co-workers, their loved ones, and their communities. Indoor social gatherings and events of more than 10 people are prohibited. Outdoor social gatherings and events are permitted so long as people maintain six feet of distance from one another and the assemblage consists of no more than 100 people.

Acting under the Michigan Constitution of 1963 and Michigan law, I order the following:

1. For purposes of this order, Michigan comprises eight separate regions.
  - (a) Region 1 includes the following counties: Monroe, Washtenaw, Livingston, Genesee, Lapeer, Saint Clair, Oakland, Macomb, and Wayne.
  - (b) Region 2 includes the following counties: Mason, Lake, Osceola, Clare, Oceana, Newaygo, Mecosta, Isabella, Muskegon, Montcalm, Ottawa, Kent, and Ionia.
  - (c) Region 3 includes the following counties: Allegan, Barry, Van Buren, Kalamazoo, Calhoun, Berrien, Cass, Saint Joseph, and Branch.
  - (d) Region 4 includes the following counties: Oscoda, Alcona, Ogemaw, Iosco, Gladwin, Arenac, Midland, Bay, Saginaw, Tuscola, Sanilac, and Huron.
  - (e) Region 5 includes the following counties: Gratiot, Clinton, Shiawassee, Eaton, and Ingham.
  - (f) Region 6 includes the following counties: Manistee, Wexford, Missaukee, Roscommon, Benzie, Grand Traverse, Kalkaska, Crawford, Leelanau, Antrim, Otsego, Montmorency, Alpena, Charlevoix, Cheboygan, Presque Isle, and Emmet.
  - (g) Region 7 includes the following counties: Hillsdale, Lenawee, and Jackson.
  - (h) Region 8 includes the following counties: Gogebic, Ontonagon, Houghton, Keweenaw, Iron, Baraga, Dickinson, Marquette, Menominee, Delta, Alger, Schoolcraft, Luce, Mackinac, and Chippewa.



2. Any work that is capable of being performed remotely (i.e., without the worker leaving his or her home or place of residence) must be performed remotely.
3. Any business or operation that requires its employees to leave their home or place of residence for work is subject to the rules on workplace safeguards in Executive Order 2020-97 or any order that may follow from it.
4. Any individual who leaves his or her home or place of residence must:
  - (a) Follow social distancing measures recommended by the Centers for Disease Control and Prevention (“CDC”), including remaining at least six feet from people from outside the individual’s household to the extent feasible under the circumstances.
  - (b) Wear a face covering over his or her nose and mouth—such as a homemade mask, scarf, bandana, or handkerchief—when in any enclosed public space, unless the individual is unable medically to tolerate a face covering.
    - (1) An individual may be required to temporarily remove a face covering upon entering an enclosed public space for identification purposes. An individual may also remove a face covering to eat or drink when seated at a restaurant or bar.
    - (2) Businesses and building owners, and those authorized to act on their behalf, are permitted to deny entry or access to any individual who refuses to comply with the rule in this subsection (b). Businesses and building owners will not be subject to a claim that they have violated the covenant of quiet enjoyment, to a claim of frustration of purpose, or to similar claims for denying entry or access to a person who refuses to comply with this subsection (b).
    - (3) Supplies of N95 masks and surgical masks should generally be reserved, for now, for health care professionals, first responders (e.g., police officers, fire fighters, paramedics), and other critical workers who interact with the public.
    - (4) The protections against discrimination in the Elliott-Larsen Civil Rights Act, 1976 PA 453, as amended, MCL 37.2101 et seq., and any other protections against discrimination in Michigan law, apply in full force to individuals who wear a face covering under this order.
5. Indoor social gatherings and events among persons not part of a single household are permitted, but may not exceed 10 people.
6. Outdoor social gatherings and events among persons not part of a single household are permitted, but only to the extent that:
  - (a) The gathering or event does not exceed 100 people, and
  - (b) People not part of the same household maintain six feet of distance from one another.

7. Unless otherwise prohibited by local regulation, outdoor parks and recreational facilities may be open, provided that they make any reasonable modifications necessary to enable employees and patrons not part of the same household to maintain six feet of distance from one another, and provided that areas in which social distancing cannot be maintained be closed, subject to guidance issued by the Department of Health and Human Services.
8. Unless otherwise prohibited by local regulation, public swimming pools, as defined by MCL 333.12521(d), may open as of June 8, 2020, provided that they are outdoors and limit capacity to 50% of the bather capacity limits described in Rule 325.2193 of the Michigan Administrative Code, and subject to guidance issued by the Department of Health and Human Services. Indoor public swimming pools must remain closed.
9. Day camps for children, as defined by Rule 400.11101(i) of the Michigan Administrative Code, may open as of June 8, 2020, subject to guidance issued by the Department of Licensing and Regulatory Affairs. Residential, travel, and troop camps within the meaning of Rule 400.11101(n), (p), or (q) of the Michigan Administrative Code must remain closed for the time being.
10. Unless otherwise prohibited by local regulation, libraries and museums may open as of June 8, 2020, subject to the rules governing retail stores described in Executive Order 2020-97 or any order that may follow from it.
11. Stores that were closed under Executive Order 2020-96 (or that were open only by appointment under the same order) must remain closed to the public (or open only by appointment) until June 4 at 12:01 am. Such stores may then resume normal operations, subject to local regulation and to the capacity constraints and workplace standards described in Executive Order 2020-97 or any order that may follow from it.
12. Subject to the exceptions in section 14, the following places are closed to ingress, egress, use, and occupancy by members of the public:
  - (a) Indoor theaters, cinemas, and performance venues.
  - (b) Indoor gymnasiums, fitness centers, recreation centers, sports facilities, exercise facilities, exercise studios, and the like.
  - (c) Facilities offering non-essential personal care services, including hair, nail, tanning, massage, traditional spa, tattoo, body art, and piercing services, and similar personal care services that involve close contact of persons.
  - (d) Casinos licensed by the Michigan Gaming Control Board, racetracks licensed by the Michigan Gaming Control Board, and Millionaire Parties licensed by the Michigan Gaming Control Board.

- (e) Indoor services or facilities, or outdoor services or facilities involving close contact of persons, for amusement or other recreational or entertainment purposes, such as amusement parks, arcades, bingo halls, bowling alleys, indoor climbing facilities, indoor dance areas, skating rinks, trampoline parks, and other similar recreational or entertainment facilities.
13. Unless otherwise prohibited by local regulation, restaurants, food courts, cafes, coffeehouses, bars, taverns, brew pubs, breweries, microbreweries, distilleries, wineries, tasting rooms, special licensees, clubs, and like places may be open to the public as follows:
- (a) For delivery service, window service, walk-up service, drive-through service, or drive-up service, and may permit up to five members of the public at one time for the purpose of picking up their food or beverage orders, so long as those individuals are at least six feet apart from one another while on premises.
  - (b) In Regions 1, 2, 3, 4, 5, and 7, beginning at 12:01 am on June 8, 2020, for outdoor and indoor seating, subject to the capacity constraints and workplace standards described in Executive Order 2020-97 or any order that may follow from it.
  - (c) In Regions 6 and 8, for outdoor and indoor seating, subject to the capacity constraints and workplace standards described in Executive Order 2020-97 or any order that may follow from it.
14. The restrictions imposed by sections 12 and 13 of this order do not apply to any of the following:
- (a) Outdoor fitness classes, athletic practices, training sessions, or games, provided that coaches, spectators, and participants not from the same household maintain six feet of distance from one another at all times during such activities, and that equipment and supplies are shared to the minimum extent possible and are subject to frequent and thorough disinfection and cleaning.
  - (b) Services necessary for medical treatment as determined by a licensed medical provider.
  - (c) Health care facilities, residential care facilities, congregate care facilities, and juvenile justice facilities.
  - (d) Crisis shelters or similar institutions.
  - (e) Food courts inside the secured zones of airports.
  - (f) Employees, contractors, vendors, or suppliers who enter, use, or occupy the places described in section 12 of this order in their professional capacity.
15. Nothing in this order should be taken to interfere with or infringe on the powers of the legislative and judicial branches to perform their constitutional duties or exercise their authority. Similarly, nothing in this order shall be taken to abridge

protections guaranteed by the state or federal constitution under these emergency circumstances.

16. Consistent with prior guidance, neither a place of religious worship nor its owner is subject to penalty under section 19 of this order for allowing religious worship at such place. No individual is subject to penalty under section 19 of this order for engaging in religious worship at a place of religious worship, or for violating the face covering requirement of section 4(b) of this order.
17. Executive Orders 2020-69 and 2020-96 are rescinded. Except as specified, nothing in this order supersedes any other executive order. This order takes effect immediately unless otherwise specified.
18. In determining whether to maintain, intensify, or relax the restrictions in this order, I will consider, among other things, (1) data on COVID-19 infections and the disease's rate of spread; (2) whether sufficient medical personnel, hospital beds, and ventilators exist to meet anticipated medical need; (3) the availability of personal protective equipment for the health care workforce; (4) the state's capacity to test for COVID-19 cases and isolate infected people; and (5) economic conditions in the state.
19. Consistent with MCL 10.33 and MCL 30.405(3), a willful violation of this order is a misdemeanor.

Given under my hand and the Great Seal of the State of Michigan.



Date: June 1, 2020

Time: 2:27 pm

---

GRETCHEN WHITMER  
GOVERNOR

By the Governor:

---

SECRETARY OF STATE

# EXHIBIT 2



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
OFFICE OF THE GOVERNOR  
LANSING

GARLIN GILCHRIST II  
LT. GOVERNOR

## EXECUTIVE ORDER

No. 2020-143

### Closing indoor service at bars

The novel coronavirus (COVID-19) is a respiratory disease that can result in serious illness or death. It is caused by a new strain of coronavirus not previously identified in humans and easily spread from person to person. There is currently no approved vaccine or antiviral treatment for this disease.

On March 10, 2020, the Department of Health and Human Services identified the first two presumptive-positive cases of COVID-19 in Michigan. On that same day, I issued Executive Order 2020-4. This order declared a state of emergency across the state of Michigan under section 1 of article 5 of the Michigan Constitution of 1963, the Emergency Management Act, 1976 PA 390, as amended (EMA), MCL 30.401 et seq., and the Emergency Powers of the Governor Act of 1945, 1945 PA 302, as amended (EPGA), MCL 10.31 et seq.

Since then, the virus spread across Michigan, bringing deaths in the thousands, confirmed cases in the tens of thousands, and deep disruption to this state's economy, homes, and educational, civic, social, and religious institutions. On April 1, 2020, in response to the widespread and severe health, economic, and social harms posed by the COVID-19 pandemic, I issued Executive Order 2020-33. This order expanded on Executive Order 2020-4 and declared both a state of emergency and a state of disaster across the State of Michigan under section 1 of article 5 of the Michigan Constitution of 1963, the Emergency Management Act, and the Emergency Powers of the Governor Act of 1945. And on April 30, 2020, finding that COVID-19 had created emergency and disaster conditions across the State of Michigan, I issued Executive Order 2020-67 to continue the emergency declaration under the EPA, as well as Executive Order 2020-68 to issue new emergency and disaster declarations under the EMA.

Those executive orders have been challenged in *Michigan House of Representatives and Michigan Senate v. Whitmer*. On May 21, 2020, the Court of Claims ruled that Executive Order 2020-67 is a valid exercise of authority under the Emergency Powers of the Governor Act but that Executive Order 2020-68 is not a valid exercise of authority under the Emergency Management Act. Both of those rulings are being challenged on appeal.

On June 18, 2020, I issued Executive Order 2020-127, again finding that the COVID-19 pandemic constitutes a disaster and emergency throughout the State of Michigan. That order constituted a state of emergency declaration under the Emergency Powers of the Governor Act of 1945. And, to the extent the governor may declare a state of emergency and a state of disaster under the Emergency Management Act when emergency and disaster conditions exist yet the legislature had declined to grant an extension request, that order also constituted a state of emergency and state of disaster declaration under that act.

The Emergency Powers of the Governor Act provides a sufficient legal basis for issuing this executive order. In relevant part, it provides that, after declaring a state of emergency, “the governor may promulgate reasonable orders, rules, and regulations as he or she considers necessary to protect life and property or to bring the emergency situation within the affected area under control.” MCL 10.31(1).

Nevertheless, subject to the ongoing litigation and the possibility that current rulings may be overturned or otherwise altered on appeal, I also invoke the Emergency Management Act as a basis for executive action to combat the spread of COVID-19 and mitigate the effects of this emergency on the people of Michigan, with the intent to preserve the rights and protections provided by the EMA. The EMA vests the governor with broad powers and duties to “cop[e] with dangers to this state or the people of this state presented by a disaster or emergency,” which the governor may implement through “executive orders, proclamations, and directives having the force and effect of law.” MCL 30.403(1)–(2). This executive order falls within the scope of those powers and duties, and to the extent the governor may declare a state of emergency and a state of disaster under the Emergency Management Act when emergency and disaster conditions exist yet the legislature has not granted an extension request, they too provide a sufficient legal basis for this order.

To suppress the spread of COVID-19, to prevent the state’s health care system from being overwhelmed, to allow time for the production of critical test kits, ventilators, and personal protective equipment, to establish the public health infrastructure necessary to contain the spread of infection, and to avoid needless deaths, it was reasonable and necessary to direct residents to remain at home or in their place of residence to the maximum extent feasible. To that end, on March 23, 2020, I issued Executive Order 2020-21, ordering all people in Michigan to stay home and stay safe. In Executive Orders 2020-42, 2020-59, 2020-70, 2020-77, 2020-92, 2020-96, and 2020-110, I extended that initial order, modifying its scope as needed and appropriate to match the ever-changing circumstances presented by this pandemic.

The measures put in place by these executive orders have been effective. Although the virus remains aggressive and persistent—on June 30, 2020, Michigan reported 373 new confirmed cases—the strain on our health care system has relented, even as our testing capacity has increased. Where Michigan was once among the states most heavily hit, our per-capita case rate is now roughly equivalent to the national average.

Our progress in suppressing COVID-19, however, appears to have stalled out. Over the past week, every region in Michigan has seen an uptick in new cases, and daily case counts now exceed 20 cases per million in the Grand Rapids, Lansing, and Kalamazoo regions. A relatively large proportion of these new cases are occurring among young people: nearly one quarter of diagnoses in June were in people aged 20 to 29, up from roughly 16% in May.



That shift aligns with national trends.

As bars have reopened for indoor service across the country, they have been linked to a growing number of large outbreaks—especially among young people. Here in Michigan, for example, health officials in Ingham County have linked 107 confirmed COVID-19 cases to an outbreak in a single bar in East Lansing. Similar super-spreader events have been documented in bars in Florida, Louisiana, Texas, and elsewhere.

Bars have many features that facilitate the spread of COVID-19: they are often crowded, indoors, and poorly ventilated. They encourage mingling among groups and facilitate close contact over an extended period of time. They are noisy, requiring raised voices and allowing for more projection of viral droplets. And they serve alcohol, which reduces inhibitions and decreases compliance with mask use and physical distancing rules. As Dr. Anthony Fauci, Director of the National Institute of Allergy and Infectious Diseases, said yesterday in a hearing before the U.S. Senate, “Congregation at a bar, inside, is bad news.”

To protect our state from a new wave of infections and to increase the likelihood that we can reopen schools in the fall, this order closes bars and nightclubs for indoor service in those regions that are in Phase 4 of the Michigan Safe Start Plan. Restaurants can remain open for indoor service, but alcohol can be served only to patrons who are seated at socially distanced tables. Common areas where people stand and congregate within restaurants must be closed. Restaurants and bars may remain open for outdoor seating, but only for seated customers at socially distanced tables.

Acting under the Michigan Constitution of 1963 and Michigan law, I order the following:

1. Food service establishments, as defined in section 1107(t) of the Michigan Food Law, 2000 PA 92, as amended, MCL 289.1107(t), that hold on-premises retailer licenses to sell alcoholic beverages must close for indoor service if they earn more than 70% of their gross receipts from sales of alcoholic beverages.
2. Any food service establishment that serves alcoholic beverages for on-premises consumption must, both indoors and outdoors:
  - (a) Require patrons to wear a face covering except when seated at their table or bar top (unless the patron is unable medically to tolerate a face covering);
  - (b) Require patrons to remain seated at their tables or bar tops, except to enter or exit the premises, to order food, or to use the restroom;
  - (c) Sell alcoholic beverages only via table service, not via orders at the bar except to patrons seated at the bar;
  - (d) Prohibit access to common areas in which people can congregate, dance, or otherwise mingle; and
  - (e) Follow all of the applicable workplace safeguards established in Executive Order 2020-114 and any order that may follow from it, including the provisions limiting capacity to 50% of normal seating and requiring six feet of separation between



parties or groups at different tables or bar tops.

3. Food service establishments that are closed for indoor service under section 1 of this order but open for outdoor service must:
  - (a) Prohibit patrons from entering the establishment, except to walk through in order to access the outdoor area, to leave the establishment, or to use the restroom; and
  - (b) Require patrons to wear a face covering while inside, except for patrons who are unable medically to tolerate a face covering.
4. Dance and topless activity permits issued under subsections 2 or 3 of section 916 of the Michigan Liquor Control Code, 1998 PA 58, as amended, MCL 436.1916(2) and (3), are temporarily suspended. Combination dance—entertainment permits and topless activity—entertainment permits issued under subsection 4 of section 916 of the Michigan Liquor Control Code, MCL 436.1916(4), are suspended to the extent they allow dancing and topless activity, but remain valid to the extent they allow other entertainment.
5. In enforcing the Michigan Liquor Control Code, the Michigan Liquor Control Commission will consider whether the public health, safety or welfare requires summary, temporary suspension of a license under section 92 of the Administrative Procedures Act of 1969, 1969 PA 306, as amended, MCL 24.292(2).
6. For purposes of calculating its percentage of gross receipts from sales of alcoholic beverages under section 1, a food service establishment must use:
  - (a) Gross receipts from 2019; or
  - (b) If the establishment was not in operation in 2019, gross receipts from the date the establishment opened in 2020.
7. Nothing in this order should be taken to prevent food service establishments from selling alcoholic beverages for off-premises consumption to patrons who are not seated at a table, or to require such patrons to remain seated when ordering such beverages.
8. Nothing in this order should be taken to prevent the holder of a social district license under section 551 of the Michigan Liquor Control Code, 1998 PA 58, as amended by Enrolled House Bill 5781 (100th Legislature, Regular Session of 2020), to be codified at MCL 436.1551:
  - (a) From selling alcoholic beverages for consumption in a commons area within a designated social district to patrons who are not seated at a table; or
  - (b) To require such patrons to remain seated when ordering such beverages.

9. Nothing in this order should be taken to limit the authority of local health departments to adopt more stringent measures to curtail the spread of COVID-19 at food service establishments.
10. This order does not apply in Regions 6 and 8, as those regions are defined by section 1 of Executive Order 2020-110 or any order that follows from it.
11. This order takes effect at 11:00 pm on July 1, 2020.
12. Consistent with MCL 10.33 and MCL 30.405(3), a willful violation of this order is a misdemeanor.

Given under my hand and the Great Seal of the State of Michigan.



Date: July 1, 2020

Time: 3:31 pm

---

GRETCHEN WHITMER  
GOVERNOR

By the Governor:

---

SECRETARY OF STATE

# EXHIBIT 3

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN

KIMBERLY BEEMER, PAUL CAVANAUGH,  
and ROBERT MUISE,  
Plaintiffs,

v.

GRETCHEN WHITMER, in her official capacity  
as Governor for the State of Michigan, ALLEN  
TELGENHOF, in his official capacity as  
Charlevoix County Prosecuting Attorney, BRIAN  
L. MACKIE, in his official capacity as Washtenaw  
County Prosecuting Attorney, and WILLIAM J.  
VAILLIENCOURT, JR., in his official capacity as  
Livingston County Prosecuting Attorney,  
Defendants.

No. 1:20-cv-00323

Hon. Paul L. Maloney

U.S. Magistrate Judge Phillip J. Green

**STIPULATED ORDER RESOLVING PLAINTIFFS' MOTION FOR TEMPORARY  
RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

American Freedom Law Center  
Robert J. Muise, Esq. (P62849)  
P.O. Box 131098  
Ann Arbor, Michigan 48113  
(734) 635-3756  
rmuise@americanfreedomlawcenter.org  
*Attorneys for Plaintiffs*

Seward Henderson PLLC  
T. Joseph Seward (P35095)  
210 East 3rd Street, Suite 212  
Royal Oak, Michigan 48067  
(248) 733-3580  
jseward@sewardhenderson.com  
*Attorneys for Defendant Vaillencourt*

Michigan Department of Attorney General  
Joseph T. Froehlich (P71887)  
Assistant Attorney General  
525 West Ottawa Street, P.O. Box 30754  
Lansing, Michigan 48909  
(517) 335-7573  
froehlichj1@michigan.gov  
*Attorneys for Defendant Whitmer*

Rosati Schultz Joppich & Amtsbuechler PC  
Andrew J. Brege (P71474)  
822 Centennial Way, Suite 270  
Lansing, Michigan 48917  
(517) 886-3800  
*Attorney for Defendant Telgenhof*

Miller, Canfield, Paddock and Stone PLC  
Sonal Hope Mithani (P51984)  
101 North Main, Seventh Floor  
Ann Arbor, Michigan 48104  
(734) 668-7786  
Mithani@millercanfield.com  
*Attorneys for Defendant Mackie*

Plaintiffs Kimberly Beemer, Paul Cavanaugh, and Robert Muise (collectively referred to as “Plaintiffs”), through counsel, Defendant Gretchen Whitmer, through counsel, Defendant Allen Telgenhof, through counsel, Defendant Brian L. Mackie, through counsel, and Defendant William J. Vaillencourt, Jr., through counsel, (collectively referred to as the “parties”) hereby stipulate to the following and to the entry of the attached Order, which will resolve Plaintiffs’ pending Motion for Temporary Restraining Order and Preliminary Injunction (“TRO/PI Motion”) (Doc. No. 7):

1. On April 15, 2020, Plaintiffs filed this lawsuit seeking to enjoin Defendants from enforcing certain measures of Executive Order 2020-42, which was issued on April 9, 2020.

2. On April 20, 2020, Plaintiffs filed their TRO/PI Motion, seeking specific preliminary relief from the challenged measures of Executive Order 2020-42. The Court set a hearing on Plaintiffs’ motion for April 30, 2020. (Doc. No. 15).

3. On April 24, 2020, Defendant Whitmer issued Executive Order 2020-59, which the parties agree applies and will be enforced as follows:

a. Executive Order 2020-59 permits individuals to travel between their own residences and cottages within the State of Michigan, thereby permitting Plaintiff Beemer, along with members of her household, to travel to and from her residence in Saginaw, Michigan and her cottage located in Charlevoix County, Michigan, and permitting Plaintiff Cavanaugh, along with members of his household, to travel to and from his residence in Brighton, Michigan and his cottage located in Charlevoix County, Michigan. This is provided by Executive Order 2020-59, Section 7(b)(3).

b. Executive Order 2020-59 permits the operation of landscaping businesses within the State of Michigan, thereby permitting Plaintiff Cavanaugh to reopen his landscaping business, Cavanaugh’s Lawn Care LLC, subject to the mitigation measures required under Section

11 of the order, including the enhanced social-distancing rules described in section 11(h). This is provided by Executive Order 2020-59, Section 4(c) and Section 10(c).

c. Executive Order 2020-59 permits individuals, including Plaintiffs Beemer and Cavanaugh, to engage in outdoor activities that include using boats with motors for fishing and other similar recreational purposes, consistent with remaining at least six feet from people from outside the individual's household. This is provided by Executive Order 2020-59, Section 7(a)(1).

d. Executive Order 2020-59 permits, insofar as is otherwise permissible under the law, the sale of guns from any store via remote order and curbside pick-up, and the sale of guns in-store from stores that sell necessary supplies as well as guns in their normal course of business, subject to the mitigation measures required by Sections 11 and 12 of the order. The order permits individuals, including Plaintiff Muise, to travel to and from such businesses. This is provided by Executive Order 2020-59, Section 5(c), Section 7(a)(8), Section 10(a), and Section 12(c).

e. Executive Order 2020-59 exempts from penalty religious gatherings at private residences. Accordingly, Plaintiff Muise is not subject to penalty under the order for holding religious gatherings with his immediate family at his private residence located in Superior Township, Michigan. This is provided by Executive Order 2020-59, Section 16.

4. As a result of this stipulation, the TRO/PI Motion is moot because the requested relief is no longer necessary.

So stipulated this 26th day of April 2020.

American Freedom Law Center

By: Robert J. Muise  
Robert J. Muise, Esq. (P62849)

*Attorneys for Plaintiffs Beemer,  
Cavanaugh, and Muise*

Michigan Department of Attorney General

By: Joseph T. Froehlich  
Joseph T. Froehlich, Esq. (P71887)  
*Attorneys for Defendant Whitmer*

Rosati Schultz Joppich &amp; Amtsbuechler PC

By: Andrew J. Brege  
Andrew J. Brege, Esq. (P71474)  
*Attorneys for Defendant Telgenhof*

Miller, Canfield, Paddock and Stone PLC

By: Sonal Hope Mithani  
Sonal Hope Mithani, Esq. (P51984)  
*Attorneys for Defendant Mackie*

Seward Henderson PLLC

By: T. Joseph Seward  
T. Joseph Seward, Esq. (P35095)  
*Attorneys for Defendant Vaillien Court*

\* \* \*

### **ORDER**

Pursuant to the stipulation of the parties as set forth above, the provisions of this stipulation are hereby Ordered by the Court, and Plaintiffs' Motion for Temporary Restraining Order and Preliminary Injunction ([Doc. No. 7](#)) is hereby dismissed as Moot.

So Ordered this 27th day of April 2020.

/s/ Paul L. Maloney  
Paul L. Maloney  
United States District Court Judge



# EXHIBIT 4

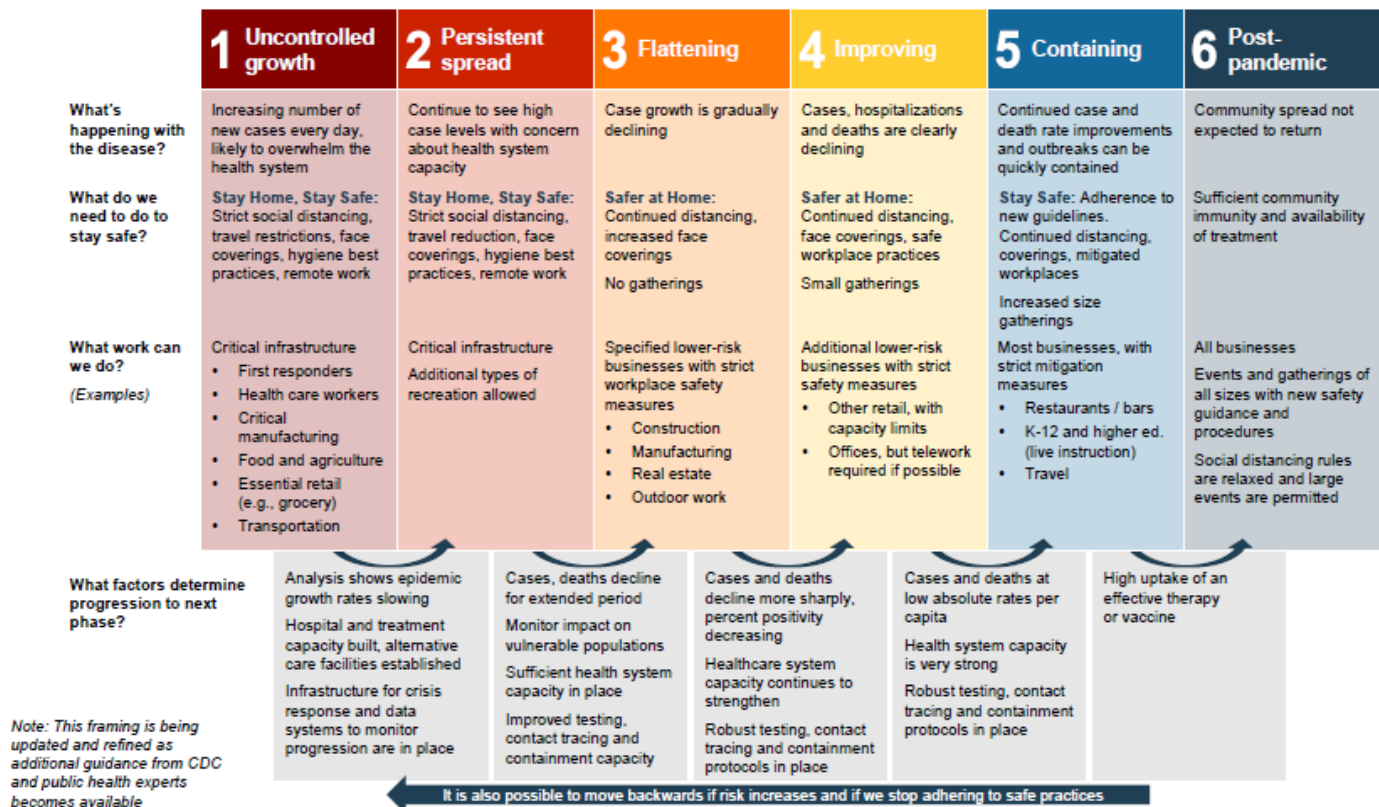


## Social Gatherings & Event Limitations Ottawa County (Region 2)

July 1, 2020

Ottawa County is part of Michigan's Economic Recovery Region 2 and is currently in Phase 4 of the Michigan Safe Start Plan. Region 2 is subject to the restrictions in Executive Order (EO) 2020-110, with the exception of subsection 12(c) of the order (rescinded by EO 2020-115).

# MI SAFE START PLAN



## **Social Gatherings & Organized Events in Ottawa County**

Ottawa County is part of Michigan Economic Recovery Region 2, and is currently in Phase 4 of the Michigan Safe Start Plan. Phase 4 focuses on continued distancing, face coverings, safe workplace practices, and small gatherings. As part of Region 2, Ottawa County is subject to the restrictions in Executive Order (EO) 2020-110, with the exception of subsection 12(c) of the order (rescinded by EO 2020-115). EO 2020-114 provides workplace standards to prevent viral transmission of COVID-19, but does not supersede, or eliminate, the restrictions on events, gatherings, and businesses as set forth in EO 2020-110.

Social gatherings and organized events include any organized events among persons not part of the same household (e.g. weddings, rehearsal dinner, charity dinners, dances, etc.). These are organized events traditionally held at banquet halls, event spaces, or other locations within the community. They are considered social gatherings and are not regular bar and restaurant operations. Holding banquets and events does not align with the Phase 4 requirements of small gatherings to prevent the spread of COVID-19.

As part of Region 2, Ottawa County is currently under the limitations and requirements as specified in EO 2020-110 for social gatherings and events. While bars and restaurants are allowed 50% capacity of normal seating, they are not permitted to hold events that exceed the social gathering & event limitations as set forth in EO 2020-110. It is the responsibility of the restaurant/bar owner or the event coordinator to ensure that the requirements are met. **Failure to ensure compliance at an establishment or event greatly increases the risk of an outbreak and may result in enforcement actions.**

### **Gatherings & Events Clarification from Governor Whitmer:**

Kim Russell, reporter for 7 Action News (Detroit), specifically asked for clarification related to banquet halls/event centers from Governor Gretchen Whitmer on June 24, 2020.

*7 Action News asked the governor what the intent was of the executive order?*

*"There is a cap on gatherings, so that is what is applicable," said Gov. Gretchen Whitmer (D-Michigan).*

*That means no gatherings larger than ten indoors.*

*"People who run banquet halls can understand they are not a regular restaurant operation," said Gov. Whitmer.*

<https://www.wxyz.com/news/coronavirus/banquet-halls-seek-guidance-as-they-work-to-plan-events-weddings-during-a-pandemic>

Ottawa County Department of Public Health does not consider banquets and events as routine restaurant and bar operations, rather, these are social gatherings or organized events that are subject to the limits as set forth in EO 2020-110, including, but not limited to:

### **INDOOR SOCIAL GATHERINGS & EVENTS**

5. Indoor social gatherings and events among persons not part of a single household are permitted, but may not exceed 10 people.

## **OUTDOOR SOCIAL GATHERINGS & EVENTS**

6. Outdoor social gatherings and events among persons not part of a single household are permitted, but only to the extent that:
  - a. The gathering or event does not exceed 100 people, and
  - b. People not part of the same household maintain six feet of distance from one another.

*NOTE: It is the responsibility of the event coordinator, or facility, to develop a detailed plan to address these restrictions, and ensure compliance will be achieved at the gathering/event. The OCDPH may request to review this plan.*

As Region 2 is moved from Phase 4 to the Phase 5 phase of the Michigan Safe Start Plan, these restrictions may change. More information on Michigan's Safe Start Plan can be found by [clicking here](#).

Links and relevant sections of EO 2020-110 and EO 2020-114 are included below.

### **Executive Order 2020-110: Restrictions on Certain Events, Gatherings, and Businesses**

"Michiganders must continue to wear face coverings when in enclosed public spaces and should continue to take all reasonable precautions to protect themselves, their co-workers, their loved ones, and their communities. Indoor social gatherings and events of more than 10 people are prohibited. Outdoor social gatherings and events are permitted so long as people maintain six feet of distance from one another and the assemblage consists of no more than 100 people."

5. Indoor social gatherings and events among persons not part of a single household are permitted, but may not exceed 10 people.
6. Outdoor social gatherings and events among persons not part of a single household are permitted, but only to the extent that:
  - a. The gathering or event does not exceed 100 people, and
  - b. People not part of the same household maintain six feet of distance from one another.
13. Unless otherwise prohibited by local regulation, restaurants, food courts, cafes, coffeehouses, bars, taverns, brew pubs, breweries, microbreweries, distilleries, wineries, tasting rooms, special licensees, clubs, and like places may be open to the public as follows:
  - a. For delivery service, window service, walk-up service, drive-through service, or drive-up service, and may permit up to five members of the public at one time for the purpose of picking up their food or beverage orders, so long as those individuals are at least six feet apart from one another while on premises.
  - b. In Regions 1, 2, 3, 4, 5, and 7, beginning at 12:01 am on June 8, 2020, for outdoor and indoor seating, subject to the capacity constraints and workplace standards described in Executive Order 2020-97 or any order that may follow from it. (*NOTE: EO 2020-97 has been rescinded, EO 2020-114 now defines these standards*).

**Executive Order 2020-114: Safeguards to Protect Michigan's Workers from COVID-19**

*Note: These standards apply to traditional restaurant and bar service, the requirements do NOT supersede the indoor/outdoor social gathering requirements as specified in EO 2020-110 that would apply to banquets or events.*

8. Restaurants and bars must:
  - a. Limit capacity to 50% of normal seating.
  - b. Require six feet of separation between parties or groups at different tables or bar tops (e.g., spread tables out, use every other table, remove or put up chairs or barstools that are not in use).
  - c. Create communications material for customers (e.g., signs, pamphlets) to inform them of changes to restaurant or bar practices and to explain the precautions that are being taken to prevent infection.
  - d. Close waiting areas and ask customers to wait in cars for a notification when their table is ready.
  - e. Close self-serve food or drink options, such as buffets, salad bars, and drink stations.
  - f. Provide physical guides, such as tape on floors or sidewalks and signage on walls to ensure that customers remain at least six feet apart in any lines.
  - g. Post sign(s) at store entrance(s) informing customers not to enter if they are or have recently been sick.
  - h. Post sign(s) instructing customers to wear face coverings until they get to their table.
  - i. Require hosts, servers, and staff to wear face coverings in the dining area.
  - j. Require employees to wear face coverings and gloves in the kitchen area when handling food, consistent with guidelines from the Food and Drug Administration ("FDA").
  - k. Limit shared items for customers (e.g., condiments, menus) and clean high-contact areas after each customer (e.g., tables, chairs, menus, payment tools).
  - l. Train employees on:
    1. Appropriate use of personal protective equipment in conjunction with food safety guidelines.
    2. Food safety health protocols (e.g., cleaning between customers, especially shared condiments).
    3. How to manage symptomatic customers upon entry or in the restaurant.
  - m. Notify employees if the employer learns that an individual (including an employee, customer, or supplier) with a confirmed case of COVID-19 has visited the store.
  - n. Close restaurant immediately if an employee shows symptoms of COVID-19, defined as either the new onset of cough or new onset of chest tightness or two of the following: fever (measured or subjective), chills, rigors, myalgia, headache, sore throat, or olfactory/taste

disorder(s), and perform a deep clean, consistent with guidance from the FDA and the CDC. Such cleaning may occur overnight.

- o. Install physical barriers, such as sneeze guards and partitions at cash registers, bars, host stands, and other areas where maintaining physical distance of six feet is difficult.
- p. To the maximum extent possible, limit the number of employees in shared spaces, including kitchens, host stands, break rooms, and offices, to maintain at least a six-foot distance between employees.

# EXHIBIT 5



**Lisa Stefanovsky, M.Ed.**  
*Health Officer*

**Paul Heidel, M.D., M.P.H.**  
*Medical Director*

Date: 7/2/2020

To: Baker Events  
171 E 24<sup>th</sup> St. STE 150  
Holland, MI 49546

Food License# SFE4170078192

Re:

### **CEASE AND DESIST ORDER**

Our department has received multiple complaints regarding events being held, and/or to be held at Baker Events that do not comply with current Executive Orders issued as a response to the COVID-19 pandemic.

Michigan Executive Order 110 states:

- 5. Indoor social gatherings and events among persons not part of a single household are permitted, but may not exceed 10 people
- 6. Outdoor social gatherings and events among persons not part of a single household are permitted, but only to the extent that:
  - a: The gathering or event does not exceed 100 people, and
  - b: People not part of the same household maintain six feet of distance from one another.
- 13. Unless otherwise prohibited by local regulation, restaurants, food courts, cafes, coffeehouses, bar, taverns, brew pubs, breweries, microbreweries, distilleries, wineries, tasting rooms, special licenses, clubs, and like places may be open to the public as follows:
  - b: In Regions 1, 2, 3, 4, 5, and 7 beginning at 12:01 am on June 8, 2020, for outdoor and indoor seating, subject to the capacity constraints and workplace standards described in Executive Order 2020-97 or any order that may follow from it.

Michigan Executive Order 143 states:

- 2. Any food service establishment that serves alcoholic beverages for on-premises consumption must, both indoors and outdoors:
  - b. Require patrons to remain seated at their tables or bar tops, except to enter or exit the premises, to order food, or to use the restroom;
  - d. Prohibit access to common areas in which people can congregate, dance, or otherwise mingle

Your facility may not operate as a restaurant/bar. Events indoors that do not meet the Governor's Executive Orders, such as large indoor weddings and parties are not permitted at this time. The 50% limit for operations only applies to seating at restaurants and bars. Additionally, dancing and congregating indoors is not permitted at this time.

(continued)



Act 92, P.A. 2000, as amended, Section 6147, states *“If a food establishment is affected by fire, flooding, accidents, explosions, or other disaster that may create an imminent or substantial hazard and unless otherwise directed, all food operations shall cease and the licensee shall immediately report to the director the disaster and the effect of the disaster on the operation of the establishment. The department may recognize emergency plans that, if being followed, serve as a means to use temporary alternative procedures for continuity of operation..”*. The COVID-19 pandemic is a substantial health hazard. The Ottawa County Department of Public Health considers Executive Orders as approved plans to remain operational during the pandemic.

As a result of this direct violation of Act 92, P.A. 2000, you are ordered to cease all events that are not in compliance with Executive Order 110 and Executive Order 143. You must cease all indoor events that are larger than 10 people and all outdoor events that are larger than 100 people.

Failure to comply will result in civil citations and/or the suspension of your food service license until you can demonstrate compliance with Executive Orders.

Please don't hesitate to contact our offices if you need clarification on the requirements listed above.

Sincerely,

  
Spencer Ballard, REHS  
Environmental Health Supervisor  
Ottawa County Dept. of Public Health  
[sballard@miottawa.org](mailto:sballard@miottawa.org)

# EXHIBIT 6

County of Ottawa  
State of Michigan  
Resolution No. \_\_\_\_\_

**RESOLUTION REAFFIRMING FREEDOM OF WORSHIP IN OTTAWA COUNTY  
AND PROHIBITING OTTAWA COUNTY GOVERNMENT FROM PROSCRIBING OR  
ENUMERATING STRICTURES FOR RELIGIOUS WORSHIP**

At a regular meeting of the Board of Commissioners of the County of Ottawa, Michigan on the 14<sup>th</sup> day of July, 2020 at \_\_\_\_\_ o'clock p.m. local time, Commissioner \_\_\_\_\_ offers the following resolution.

**WHEREAS**, under the Free Exercise Clause of the First Amendment to the United States Constitution Ottawa County may not “prohibit the free exercise of religion.”

**WHEREAS**, under the Free Exercise Clause, Ottawa County may not deprive persons of their right to freely exercise their religion.

**WHEREAS**, Ottawa County could be held liable under the 42 U.S.C. § 1983 of the federal Civil Rights Act for depriving persons of their right to freely exercise their religion.

**WHEREAS**, Ottawa County may not, on one hand, allow more than 10 persons to gather at a restaurant or other commercial establishment for secular motives, but prohibit more than 10 persons to gather for religiously motivated conduct.

**WHEREAS**, Governor Gretchen Whitmer’s current executive orders exempts “a place of religious worship” or “its owner” from penalties thereunder “for allowing religious worship as such place.”

**WHEREAS**, in response to a lawsuit based on the Free Exercise Clause, Governor Whitmer conceded the executive orders’ religious exemption exempts any free exercise of religion, not only attending a religious worship service at a place of worship. *See Belanger et al. v. Gretchen Whitmer*, 20-cv-00291, ECF No. 12, (W.D. Mich. Apr. 13, 2020) (conceding that expressive activity an abortion facility is a proper exercise of religious belief).

**WHEREAS**, it has come to the attention of the County Commission that the County’s Health Department and its County’s attorney has taken official acts on behalf of the County to prohibit the free exercise of religion – namely, prohibiting gatherings of over 10 persons to witness, conduct, participate in, and pray at wedding ceremonies.

**WHEREAS**, as recently as 2018, the United State Supreme Court has acknowledge that the performance of a marriage ceremony constitutes the free exercise of religion. *See Masterpiece Cakeshop, Ltd. v. Colorado Civil Rights Comm’n*, 138 S. Ct. 1719, 1727, (2018).

**WHEREAS**, it is the duty of the County Commission to establish legal policy for Ottawa County and conduct oversight over its County departments and the administration of County government.

**NOW THEREFORE BE IT RESOLVED**, that the Ottawa County Board of Commissioners hereby declares that a gathering to witness or pray at a marriage ceremony constitutes the free exercise of religion that Ottawa County may not prohibit.

**BE IT FURTHER RESOLVED**, that all Ottawa County departments or personnel that have taken any act or communicated anything contrary to this Resolution to any person or to an establishment in Ottawa County that accommodates marriage ceremonies are hereby directed to rescind such act or retract such communication in writing as soon as possible.

**BE IT FURTHER RESOLVED**, that Ottawa County may not proscribe or enumerate strictures for the free exercise of religion that conflict with the United States Constitution.

**BE IT FURTHER RESOLVED**, that resolutions and parts of resolutions insofar as they conflict with this Resolution are hereby repealed to the extent of such conflict.

---

Chairperson, Ottawa County  
Board of Commissioners

---

Ottawa County Clerk/Register