

**RECEIVED**

FEDERAL ELECTION COMMISSION

APRIL 24, 2024 3:05 PM

OFFICE OF GENERAL COUNSEL

MUR 8250

April 23, 2024

Federal Election Commission
 Attn: Office of General Counsel
 999 E Street, NW
 Washington, DC 20463

Re: Formal Complaint Regarding Potential Illegal Coordination Between the Campaign of Candidate Paul Hudson and "West Michigan for Change" Super PAC

Dear Commissioners,

I am writing to submit a formal complaint alleging illegal coordination between the campaign of Paul Hudson, a candidate in the Republican primary for the 3rd Congressional District of Michigan, and the independent expenditure-only political action committee known as "West Michigan for Change," in violation of the Federal Election Campaign Act of 1971 (FECA) and the Commission's regulations under 11 CFR 109.20.

1. Parties Involved**Complainant:**

Lavora Barnes, Chair
 Michigan Democratic Party
 606 Townsend Street
 Lansing, MI 48933

Respondents:

Paul Hudson, candidate for the U.S. House of Representatives, 3rd Congressional District, Michigan
 Josh Volk, campaign manager for Paul Hudson
 West Michigan for Change, a registered Super PAC
 Ryan Hudson, tech entrepreneur and funder of West Michigan for Change

2. Factual Background and Allegations

On April 15, 2024, West Michigan for Change filed a quarterly fundraising report which initially listed a \$1 million contribution from the "Paul Hudson Revocable Trust." Paul Hudson, the candidate for MI-03, lists up to \$26 million in trust assets on his own personal financial disclosure, so while unusual, this was plausible. But the filing was still unusual enough that it caused the Detroit News to reach out to the campaign of Paul Hudson.

Less than 30 minutes after the campaign of Paul Hudson received this call, West Michigan for Change filed an amended report, changing the \$1 million contribution to be from the "Ryan Hudson Revocable Trust." Ryan Hudson is the candidate's brother.

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As the Detroit News reported:

The Detroit News reached out to the Hudson campaign for comment on the matter Tuesday afternoon. Within 30 minutes, the super PAC filed an amended disclosure with the Federal Election Commission changing the contributor's name to the Ryan Hudson Revocable Trust.¹

This sequence of events raises concerns about potential illegal coordination between Paul Hudson's campaign and the Super PAC. Notably, the correction in the reported donor was made within 30 minutes after the campaign was contacted by the media for comments, but before any contact was made with the Super PAC by the media. This suggests that the campaign was aware of the filing details of the Super PAC, an action that may indicate coordination, which is prohibited under 11 CFR 109.20.

This clear indication of coordination also raises the question as to how one could be confused as to the origin of the entirety of West Michigan for Change's funding.

West Michigan for Change received a total of one single donation. It was for one million dollars. That an entity could lose track of its only donor, and a seven-figure one at that, raises the obvious question as to why the entity filed a report indicating that Paul Hudson's trust had made the donation in the first place.

3. Request for Investigation

Given these concerns, I urge the FEC to initiate a thorough investigation into the relationship between Paul Hudson's campaign and West Michigan for Change. This should include a review of communication records between the campaign staff and the Super PAC's officials, as well as any financial transactions or shared strategy discussions that might further demonstrate coordination beyond what is permissible under current campaign finance laws.

I am prepared to provide further information as needed and request that the FEC keep me informed of the progress of this investigation.

Thank you for your attention to this matter.

Sincerely,

Lavora Barnes

Lavora Barnes, Chair
Michigan Democratic Party
606 Townsend Street
Lansing, MI 48933

¹ ["Michigan congressional candidate's brother bankrolling super PAC aiding his campaign." Schwab, Detroit News, 4/17/2024](#)

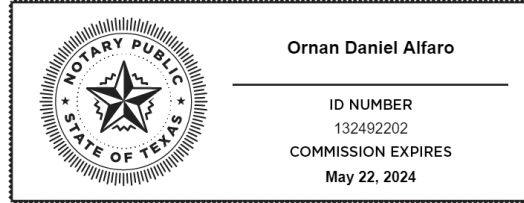
SUBSCRIBED AND SWORN to before me this 24th day of April, 2024.

Ornan D Alfaro

Notary Public
Notary Public, State of Texas, Harris County

My Commission Expires:

05/22/2024



Electronically signed and notarized online using the Proof platform.