

**FEDERAL ELECTION COMMISSION**  
**FIRST GENERAL COUNSEL'S REPORT**

**MUR 8250**

DATE COMPLAINT FILED: Apr. 24, 2024

DATES OF NOTIFICATIONS: May 9, 2024, Jan. 21, 2025

LAST RESPONSE RECEIVED: June 24, 2024

DATE ACTIVATED: Nov. 7, 2024

EXPIRATION OF SOL: Apr. 12, 2029 – Oct. 14, 2029

ELECTION CYCLE: 2024

**COMPLAINANTS:**

Lavora Barnes

**RESPONDENT:**

Paul Hudson for Congress and Jason D. Boles in his  
official capacity as treasurer

Paul Hudson

West Michigan for Change and Katie Reid in her  
official capacity as treasurer

Ryan Hudson

Josh Volk

**RELEVANT STATUTES  
AND REGULATIONS:**

52 U.S.C. § 30116(a)(1)(C), (f)

52 U.S.C. § 30116(a)(7)(B)(i)

11 C.F.R. § 109.20(a)

11 C.F.R. § 110.1(d)

11 C.F.R. § 110.9

**INTERNAL REPORTS CHECKED:** Disclosure Reports

**FEDERAL AGENCIES CHECKED:** None

**I. INTRODUCTION**

The Complaint in this matter alleges that West Michigan for Change and Katie Reid in her official capacity as treasurer, an independent expenditure-only political committee (“IEOPC”), and Paul Hudson and Paul Hudson for Congress and Jason D. Boles in his official capacity as treasurer, violated the Federal Election Campaign Act of 1971, as amended, (the

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1 “Act”) or Commission regulations by respectively making and accepting excessive contributions  
2 in the form of coordinated expenditures.

3 As described below, the Complaint bases these allegations on a news report of a single  
4 communication between the Hudson campaign and West Michigan for Change. This  
5 communication was reportedly in connection with rectifying the disclosure of a contribution to  
6 West Michigan for Change, which was originally reported as coming from the candidate, rather  
7 than his brother, Ryan Hudson. The Complaint infers that the campaign and the IEOPC must be  
8 in regular contact and coordinating the IEOPC's expenditures because West Michigan for  
9 Change amended its disclosure report only 30 minutes after Hudson's campaign manager, Josh  
10 Volk, was alerted to the reported contribution by the candidate. The Responses state that the  
11 contact between the campaign committee and the IEOPC consisted only of one brief call to  
12 clarify that the candidate was not the source of the contribution.

13 The Complaint's allegations are speculative, as the existence of a single call regarding  
14 West Michigan for Change's mistaken disclosure reports does not create a reasonable inference  
15 that any expenditure was made by West Michigan for Change “in cooperation, consultation, or  
16 concert with, or at the request or suggestion of” Hudson or his campaign committee.

17 Accordingly, we recommend that the Commission dismiss the allegations that West Michigan  
18 for Change and Paul Hudson and Paul Hudson for Congress violated the Act or Commission  
19 regulations by, respectively, making and knowingly accepting excessive contributions, in the  
20 form of coordinated expenditures.

21 The Complaint also names the candidate's brother and his campaign manager as  
22 respondents in this matter based on their roles in the events, but it does not specifically allege  
23 any violation of the Act or Commission regulations by either. Even if the record did establish

that West Michigan for Change made a coordinated expenditure on behalf of Paul Hudson for Congress, Ryan Hudson and Volk's roles would not create liability for either of them. Accordingly, we recommend that the Commission dismiss the allegations against Ryan Hudson and Volk.

## II. FACTUAL BACKGROUND

Paul Hudson was a candidate for Michigan's third congressional district in the 2024 general election.<sup>1</sup> Paul Hudson for Congress was his principal campaign committee.<sup>2</sup> Josh Volk was Hudson's campaign manager.<sup>3</sup> Paul Hudson, Hudson for Congress and Volk ("Hudson Campaign Respondents") filed a joint response in connection with this matter.<sup>4</sup> Ryan Hudson is the candidate's brother.<sup>5</sup> West Michigan for Change is an IEOPC that reported \$418,198.62 in independent expenditures supporting Paul Hudson's candidacy.<sup>6</sup>

On April 15, 2024, West Michigan for Change filed its 2024 April Quarterly Report with the Commission reflecting a \$1 million contribution from "Paul Hudson Revocable Trust."<sup>7</sup> On April 16, 2024, a reporter with the *Detroit News*, reached out to Volk to inquire about this reported contribution by the candidate's revocable trust.<sup>8</sup> According to the *Detroit News*, within

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<sup>1</sup> Paul Hudson, Amend. Statement of Candidacy (Aug. 7, 2024).

<sup>2</sup> Paul Hudson for Congress, Amend. Statement of Organization (Aug. 7, 2024).

<sup>3</sup> Compl. at 1 (Apr. 24, 2024); Response of Paul Hudson, Paul Hudson for Congress and Josh Volk at 1 (July 2, 2024) ("Hudson Campaign Resp.").

<sup>4</sup> Hudson Campaign Resp.

<sup>5</sup> Compl. at 1; Ryan Hudson Resp. at 2 (June 12, 2024).

<sup>6</sup> West Michigan for Change, Statement of Organization (Dec. 13, 2023); FEC Independent Expenditures: Filtered Results, FEC.gov, [https://www.fec.gov/data/independent-expenditures/?committee\\_id=C00860148&data\\_type=processed&is\\_notice=true&candidate\\_id=H4MI03268&support\\_oppose\\_indicator=S&min\\_date=01%2F01%2F2023&max\\_date=12%2F31%2F2024](https://www.fec.gov/data/independent-expenditures/?committee_id=C00860148&data_type=processed&is_notice=true&candidate_id=H4MI03268&support_oppose_indicator=S&min_date=01%2F01%2F2023&max_date=12%2F31%2F2024) (last visited Nov. 21, 2024) (reflecting \$418,198.62 in independent expenditures supporting Paul Hudson's candidacy).

<sup>7</sup> West Michigan for Change, 2024 April Quarterly Report at 6 (Apr. 15, 2024).

<sup>8</sup> Compl. at 1; Hudson Campaign Resp. at 2.

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30 minutes of reaching out to Volk, West Michigan for Change amended its report to reflect that the source of the contributions was instead the candidate's brother's revocable trust.<sup>9</sup>

According to the Hudson Campaign Respondents, upon receiving the email, Volk confirmed with Paul Hudson that no such contribution had been made and "Jonathan Schmieder — a general consultant to Paul Hudson for Congress, called Steven Ostrow — a representative of West Michigan for Change — to inform him that Paul Hudson had not made a contribution to West Michigan for Change and that the April 15, 2024, quarterly report was incorrect."<sup>10</sup>

Ostrow confirms this account in a sworn affidavit.<sup>11</sup> Ostrow avers that he received a call from Schmieder on April 16, 2024 at 4:08 PM, which lasted one minute, and that Schmieder relayed that the campaign received the inquiry from the *Detroit News*, and that the reported contribution was incorrect, but that "nothing else was discussed."<sup>12</sup> Finally, Ostrow states that he immediately directed West Michigan for Change's treasurer to correct the report.<sup>13</sup> Eight minutes later, at 4:16 PM, West Michigan for Change filed an amended report indicating that the contribution was from "Ryan Hudson Revocable Trust."<sup>14</sup>

### III. LEGAL ANALYSIS

The Act provides that an expenditure made by any person in "cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, his or her authorized political

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<sup>9</sup> See West Michigan for Change, Amend. 2024 April Quarterly Report at 6 (Apr. 16, 2024); West Michigan for Change Resp., Ex. B (May 24, 2024) (attaching copies of its email correspondence on March 5, 2024, with Ryan Hudson and his representatives concerning Ryan Hudson making this \$1 million contribution from his revocable trust that corroborate the amended reports).

<sup>10</sup> Hudson Campaign Resp. at 2.

<sup>11</sup> West Michigan for Change Resp., Ex. A.

<sup>12</sup> *Id.* ¶¶ 3-5.

<sup>13</sup> *Id.* ¶ 6.

<sup>14</sup> West Michigan for Change, Amend. 2024 April Quarterly Rpt. (Apr. 16, 2024).

committees, or their agents,” constitutes an in-kind contribution.<sup>15</sup> Regarding political committees other than candidate or party committees, the Act and Commission regulations provide that no person shall make and no such committee shall knowingly accept a contribution of more than \$5,000.<sup>16</sup>

The Complaint and Responses largely agree on the facts of the matter. West Michigan for Change received a \$1,000,000 contribution from the revocable trust of Ryan Hudson (the brother of the candidate) that was originally reported incorrectly on its 2024 April Quarterly Report as being from the candidate’s revocable trust. Shortly after a reporter inquired about it with the Hudson campaign, West Michigan for Change amended its disclosure report to reflect that it was Ryan Hudson’s revocable trust that made the contribution.

But while the Complaint infers pervasive and ongoing coordination between Hudson’s campaign and West Michigan for Change based on these facts, the Responses credibly assert that the contact between the campaign committee and the IEOPC consisted only of one brief call to clarify that the candidate was not the source of the contribution.<sup>17</sup> The Complaint’s conclusion that these events imply broader coordination resulting in excessive in-kind contributions is speculative, and unsupported by any additional, even circumstantial, evidence. Its conclusion is further contradicted by the sworn statement and other documentation provided by West Michigan for Change.<sup>18</sup> Indeed, West Michigan for Change provided a donor assurance letter

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<sup>15</sup> 52 U.S.C. § 30116(a)(7)(B)(i); *see also* 11 C.F.R. § 109.20(a).

<sup>16</sup> 52 U.S.C. § 30116(a)(1)(C), (f); 11 C.F.R. § 110.1(d), 110.9.

<sup>17</sup> The Complaint’s allegation broadly addresses all of West Michigan for Change’s activities rather than pointing to a specific communication (or group of communications) that may have been coordinated. Therefore, there is no need to analyze the allegations under the Commission’s coordination provisions at 11 C.F.R. § 109.21.

<sup>18</sup> *See* Statement of Reasons at 1, Comm’rs Mason, Sandstrom, Smith & Thomas, MUR 4960 (Hillary Rodham Clinton for U.S. Senate Exploratory Comm., *et al.*) (“Unwarranted legal conclusions from asserted facts . . . or mere speculation . . . will not be accepted as true.”).

1 from March 5, 2024, pertaining to a planned contribution by the “Ryan Hudson Revocable  
2 Trust,” thereby confirming that the contribution was initially reported incorrectly.<sup>19</sup> The record  
3 further supports the existence of a single brief communication between representatives of the  
4 Hudson campaign and West Michigan for Change relating to that reporting error.<sup>20</sup> The mere  
5 existence of this call does not support a reasonable inference that any expenditure by West  
6 Michigan for Change was made “in cooperation, consultation, or concert with, or at the request  
7 or suggestion of” Hudson or his campaign.<sup>21</sup> Therefore, there is no information supporting the  
8 premise that West Michigan for Change made, or that Paul Hudson or Paul Hudson for Congress  
9 accepted, a contribution in the form of a coordinated expenditure.

10 Accordingly, we recommend that the Commission dismiss the allegations that West  
11 Michigan for Change and Paul Hudson and Paul Hudson for Congress violated 52 U.S.C.  
12 § 30116(a)(1)(C) or (f) by, respectively, making or accepting excessive contributions in the form  
13 of coordinated expenditures.

14 Finally, while the Complaint specifically names Ryan Hudson and Josh Volk as  
15 respondents, it does not articulate any theory of a violation resulting from their role in this  
16 matter. Even if the alleged coordinated expenditures did occur, it would not create liability for  
17 Ryan Hudson or Volk based on their alleged roles in the matter. Ryan Hudson’s sole action in  
18 the record was making a lawful contribution to West Michigan for Change; and though Volk was  
19 Paul Hudson’s campaign manager (and presumably an agent of the campaign), his only actions  
20 in the record are being alerted to the incorrect contribution attribution and seeing that the correct

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<sup>19</sup> West Michigan for Change Resp., Ex. B.

<sup>20</sup> See West Michigan for Change Resp., Ex. A.

<sup>21</sup> 52 U.S.C. § 30116(a)(7)(B)(i); see also 11 C.F.R. § 109.20(a).

information was passed on to West Michigan for Change. These facts do not suggest that Ryan Hudson or Volk either made or accepted excessive in-kind contributions from West Michigan for Change to Paul Hudson for Congress. Accordingly, we recommend that the Commission dismiss any allegations pertaining to Ryan Hudson and Josh Volk.

#### IV. RECOMMENDATIONS

1. Dismiss the allegation that West Michigan for Change and Katie Reid, in her official capacity as treasurer, Paul Hudson, Paul Hudson for Congress and Jason D. Boles in his official capacity as treasurer, Ryan Hudson and Josh Volk, violated 52 U.S.C. § 30116(a)(1)(C) or (f) by making or accepting excessive contributions in the form of coordinated expenditures.
2. Approve the attached Factual and Legal Analysis;
3. Approve the appropriate letters;
4. Close the file effective 30 days after the date the certification of this vote is signed (or on the next business day after the 30th day, if the 30th day falls on a weekend or holiday).

Lisa J. Stevenson  
Acting General Counsel

2/5/2025  
Date

Adrienne C. Baranowicz  
Adrienne C. Baranowicz  
Deputy Associate General Counsel for Enforcement

Ana J. Peña-Wallace  
Ana J. Peña-Wallace  
Assistant General Counsel

Nicholas O. Mueller  
Nicholas O. Mueller  
Attorney

Attachment:  
Factual and Legal Analysis

**FEDERAL ELECTION COMMISSION  
FACTUAL AND LEGAL ANALYSIS**

Respondents: Paul Hudson for Congress and Jason  
D. Boles in his official capacity as treasurer  
Paul Hudson  
West Michigan for Change and Katie Reid  
in her official capacity as treasurer  
Ryan Hudson  
Josh Volk

MUR 8250

**I. INTRODUCTION**

The Complaint in this matter alleges that West Michigan for Change and Katie Reid in her official capacity as treasurer, an independent expenditure-only political committee (“IEOPC”), and Paul Hudson and Paul Hudson for Congress and Jason D. Boles in his official capacity as treasurer, violated the Federal Election Campaign Act of 1971, as amended, (the “Act”) or Commission regulations by respectively making and accepting excessive contributions in the form of coordinated expenditures.

As described below, the Complaint bases these allegations on a news report of a single communication between the Hudson campaign and West Michigan for Change. This communication was reportedly in connection with rectifying the disclosure of a contribution to West Michigan for Change, which was originally reported as coming from the candidate, rather than his brother, Ryan Hudson. The Complaint infers that the campaign and the IEOPC must be in regular contact and coordinating the IEOPC’s expenditures because West Michigan for Change amended its disclosure report only 30 minutes after Hudson’s campaign manager, Josh Volk, was alerted to the reported contribution by the candidate. The Responses state that the contact between the campaign committee and the IEOPC consisted only of one brief call to clarify that the candidate was not the source of the contribution.

1           The Complaint’s allegations are speculative, as the existence of a single call regarding  
2   West Michigan for Change’s mistaken disclosure reports does not create a reasonable inference  
3   that any expenditure was made by West Michigan for Change “in cooperation, consultation, or  
4   concert with, or at the request or suggestion of” Hudson or his campaign committee.  
5   Accordingly, the Commission dismisses the allegations that West Michigan for Change and Paul  
6   Hudson and Paul Hudson for Congress violated the Act or Commission regulations by,  
7   respectively, making and knowingly accepting excessive contributions, in the form of  
8   coordinated expenditures.

9           The Complaint also names the candidate’s brother and his campaign manager as  
10   respondents in this matter based on their roles in the events, but it does not specifically allege  
11   any violation of the Act or Commission regulations by either. Even if the record did establish  
12   that West Michigan for Change made a coordinated expenditure on behalf of Paul Hudson for  
13   Congress, Ryan Hudson and Volk’s roles would not create liability for either of them.  
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## 15   **II.   FACTUAL BACKGROUND**

16           Paul Hudson was a candidate for Michigan’s third congressional district in the 2024  
17   general election.<sup>1</sup> Paul Hudson for Congress was his principal campaign committee.<sup>2</sup> Josh Volk  
18   was Hudson’s campaign manager.<sup>3</sup> Paul Hudson, Hudson for Congress and Volk (“Hudson  
19   Campaign Respondents”) filed a joint response in connection with this matter.<sup>4</sup> Ryan Hudson is

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the candidate’s brother.<sup>5</sup> West Michigan for Change is an IEOPC that reported \$418,198.62 in independent expenditures supporting Paul Hudson’s candidacy.<sup>6</sup>

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<sup>7</sup> West Michigan for Change, 2024 April Quarterly Report at 6 (Apr. 15, 2024).

<sup>8</sup> Compl. at 1; Hudson Campaign Resp. at 2.

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 3 he immediately directed West Michigan for Change’s treasurer to correct the report.<sup>13</sup> Eight  
 4 minutes later, at 4:16 PM, West Michigan for Change filed an amended report indicating that the  
 5 contribution was from “Ryan Hudson Revocable Trust.”<sup>14</sup>

### 6 **III. LEGAL ANALYSIS**

7 The Act provides that an expenditure made by any person in “cooperation, consultation,  
 8 or concert with, or at the request or suggestion of, a candidate, his or her authorized political  
 9 committees, or their agents,” constitutes an in-kind contribution.<sup>15</sup> Regarding political  
 10 committees other than candidate or party committees, the Act and Commission regulations  
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13 The Complaint and Responses largely agree on the facts of the matter. West Michigan  
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12 *Id.* ¶¶ 3-5.

13 *Id.* ¶ 6.

14 West Michigan for Change, Amend. 2024 April Quarterly Rpt. (Apr. 16, 2024).

15 52 U.S.C. § 30116(a)(7)(B)(i); *see also* 11 C.F.R. § 109.20(a).

16 52 U.S.C. § 30116(a)(1)(C), (f); 11 C.F.R. § 110.1(d), 110.9.

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2 campaign and West Michigan for Change based on these facts, the Responses credibly assert that  
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10 Trust," thereby confirming that the contribution was initially reported incorrectly.<sup>19</sup> The record  
11 further supports the existence of a single brief communication between representatives of the  
12 Hudson campaign and West Michigan for Change relating to that reporting error.<sup>20</sup> The mere  
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<sup>17</sup> The Complaint's allegation broadly addresses all of West Michigan for Change's activities rather than pointing to a specific communication (or group of communications) that may have been coordinated. Therefore, there is no need to analyze the allegations under the Commission's coordination provisions at 11 C.F.R. § 109.21.

<sup>18</sup> See Statement of Reasons at 1, Comm'rs Mason, Sandstrom, Smith & Thomas, MUR 4960 (Hillary Rodham Clinton for U.S. Senate Exploratory Comm., *et al.*) ("Unwarranted legal conclusions from asserted facts . . . or mere speculation . . . will not be accepted as true.").

<sup>19</sup> West Michigan for Change Resp., Ex. B.

<sup>20</sup> See West Michigan for Change Resp., Ex. A.

<sup>21</sup> 52 U.S.C. § 30116(a)(7)(B)(i); see also 11 C.F.R. § 109.20(a).

1           Accordingly, the Commission dismisses the allegations that West Michigan for Change  
2   and Paul Hudson and Paul Hudson for Congress violated 52 U.S.C. § 30116(a)(1)(C) or (f) by,  
3   respectively, making or accepting excessive contributions in the form of coordinated  
4   expenditures.

5           Finally, while the Complaint specifically names Ryan Hudson and Josh Volk as  
6   respondents, it does not articulate any theory of a violation resulting from their role in this  
7   matter. Even if the alleged coordinated expenditures did occur, it would not create liability for  
8   Ryan Hudson or Volk based on their alleged roles in the matter. Ryan Hudson's sole action in  
9   the record was making a lawful contribution to West Michigan for Change; and though Volk was  
10   Paul Hudson's campaign manager (and presumably an agent of the campaign), his only actions  
11   in the record are being alerted to the incorrect contribution attribution and seeing that the correct  
12   information was passed on to West Michigan for Change. These facts do not suggest that Ryan  
13   Hudson or Volk either made or accepted excessive in-kind contributions from West Michigan for  
14   Change to Paul Hudson for Congress. Accordingly, the Commission dismisses any allegations  
15   pertaining to Ryan Hudson and Josh Volk.