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BOARD OF ETHICS

www.michigan.gov/sboe

ADDRESS COMMUNICATIONS TO:

KURT WEISS
EXECUTIVE SECRETARY
BOARD OF ETHICS
400 SOUTH PINE STREET
P.O. BOX 30002
LANSING, MICHIGAN 48909

October 1, 2024

Mr. Randy Thelen
Michigan Strategic Fund
300 North Washington Square
Lansing, Michigan 48913

Re: Ethics Complaint of Tedda Hughes

Dear Mr. Thelen:

The State Board of Ethics received a sworn complaint on September 30, 2024, alleging that you have engaged in unethical conduct, pursuant to the provisions of the state ethics act. In accordance with rule 15.5(5) of the board's rules of practice and procedure, I am serving you a copy of the complaint. Ms. Tedda Hughes alleges that you violated standards 3, 4, 5, and 6 of section 2 of the state ethics act, MCL 15.342, which state:

- (3) A public officer or employee shall use personnel resources, property, and funds under the officer or employee's official care and control judiciously and solely in accordance with prescribed constitutional, statutory, and regulatory procedures and not for personal gain or benefit.
- (4) A public officer or employee shall not solicit or accept a gift or loan of money, goods, services, or other thing of value for the benefit of a person or organization, other than the state, which tends to influence the manner in which the public officer or employee or another public officer or employee performs official duties.
- (5) A public officer or employee shall not engage in a business transaction in which the public officer or employee may profit from his or her official position or authority or benefit financially from confidential information which the public officer or employee has obtained or may obtain by reason of that position or authority. Instruction which is not done during regularly scheduled working hours except for annual leave or vacation time shall not be considered a business transaction pursuant to this subsection if the instructor does not have any direct dealing with or influence on the employing or contracting facility associated with his or her course of employment with this state
- (6) Except as provided in section 2a, a public officer or employee shall not engage in or accept employment or render services for a private or public interest when that employment or service is incompatible or in conflict with the discharge of the officer or employee's official duties or when that employment may tend to

impair his or her independence of judgment or action in the performance of official duties.

You or a designee have **21 calendar days** after the date of this letter to file a written, verified answer. Rule 15.5 (7) provides:

- (7) The answer shall comply with all of the following requirements:
 - (a) Be in writing.
 - (b) Include a response to each allegation raised in the complaint.
 - (c) Contain the signature of the person charged before a notary. If the answer is filed by an entity other than the person charged, then the person charged and the entity's designee filing the answer shall sign the answer before a notary.

You must file your answer with the board's executive secretary at the address listed above, or ethicsboard@mi.gov. The executive secretary will provide a copy of your answer to the complainant. If the board decides that a public hearing is necessary, a notice specifying the date, time, location, and agenda for the meeting will be sent to you and the complainant. If you would like to receive any notice and future communications from the board via email, please provide with your answer an email address at which you would be willing to receive such communications.

After filing your written answer, any additional written information you or the complainant want the board to consider must be filed with the board's executive secretary and the opposing party, no later than 21 calendar days before the date of the board meeting scheduled to address the complaint. The opposing party must submit any written response to the executive secretary no later than 14 calendar days before the date of the board meeting. The board is tentatively scheduled to meet on December 5, 2024. Failure to timely file or failure to indicate the additional information or response was served on the opposing party may result in the board not considering the additional information or response.

You will be sent notice of the meeting at which the board will consider the complaint 28 days before the meeting. The complainant and the person charged will have an opportunity to address the board about the complaint at the meeting.

The state ethics act and the board's rules of practice and procedure are online at www.mi.gov/sboe. If you have any questions, please contact the board at (517) 284-0125 or ethicsboard@mi.gov.

Sincerely,



Kurt Weiss
Executive Secretary

Enclosure

cc: Jason Hawkins, Assistant Attorney General
Tedda Hughes, Complainant (without enclosure)