14. The Mackinac Center again attempted to obtain the requested input assumptions on April 21, 2021, but did not receive a response. **Exhibit G, April 21, 2021 Correspondence**.

15. On May 28, 2021, the MEDC directed the Mackinac Center to Chris Pike of Oxford Economics to obtain the requested records. **Exhibit H, May 28, 2021Correspondence**.

16. The Mackinac Center and Chris Pike exchanged a number of e-mails in June and July of 2021, but input assumption worksheets were not produced. On August 3, 2021, the Center again requested input assumption worksheets. **Exhibit I, August 3, 2021 Request**.

17. The Center did not receive a response, and reiterated its request on August 20, 2021. **Exhibit J, August 20, 2021 Follow Up**. The Center, again, did not receive the requested records.

18. A subsequent request on January 18, 2022 also did not result in the production of input assumption worksheets. **Exhibit K, January 18, 2022 Follow Up**.

19. On March 10, 2022, the Mackinac Center sent MEDC a demand letter for the production of records. **Exhibit L, March 10, 2022 Demand**. That demand went unanswered.

20. It has now been 489 days since the Mackinac Center made its initial request for input assumption worksheets and output produced from modeling efforts. Responsive records have not been produced, despite the Center's repeated attempts. In addition, no adequate legal explanation has been provided for why these records cannot be produced.

COUNT I: VIOLATIONS OF THE FREEDOM OF INFORMATION ACT

A. The MEDC's Failure to Specifically Respond to Plaintiff's Request Violates the Freedom of Information Act

21. The Plaintiff hereby incorporates the preceding paragraphs as if fully restated herein.

22. MCL 15.231(2) states:

> It is the public policy of this state that all persons, except those persons incarcerated in state or local correctional facilities, are entitled to fully and complete information regarding the affairs of government and the official acts of those who represent them as public officials and public employees, consistent with this act.