



May 14, 2026

### Review of Nominating Petitions

Andrea Banfield  
Nonpartisan Candidate for 44th Circuit Judge, Non-Incumbent Position

**Number of valid signatures required:** 600 signatures.

**Total filing:** 995 signatures.

**Result of face review:** 954 facially valid signatures, 41 invalid signatures.

<b>Total number of signatures filed</b>		<b>995</b>
Invalid address (address is blank, missing house number or street name, or PO Box listed)	<i>Less:</i>	2
Invalid city or township (no city or township by that name located within the county listed at the top of the petition sheet or the city/township field was left blank)	<i>Less:</i>	1
Invalid date (signature is dated before the first date signatures may be circulated; signer's signature is dated after the circulator dated their signature; date is incomplete, illegible, or missing)	<i>Less:</i>	26
Circulator information missing (failure to include the circulator name or complete residential address; circulator did not sign or date petition)	<i>Less:</i>	12
<b>Total number of facially valid signatures after face review</b>		<b>954</b>

Staff's face review of Banfield's petition sheets identified 41 invalid signatures and 954 facially valid signatures, prior to the review of challenged signatures.

**Challenge:** Jeremy Scott Gibbs filed a challenge to Banfield's nominating petitions, alleging that 401<sup>1</sup> of Banfield's petition signatures should be rejected because the signatures included all of the following:

- Petition sheets on which the circulator failed to include their city or township of residence in the circulator block

<sup>1</sup> Gibbs counts 998 signatures in Banfield's petition submission. For purposes of this staff report, staff will use the count of 995 identified during staff's face review.

- Crossed-out signatures<sup>2</sup>
- Invalid address
- Invalid city or township
- Duplicate signature
- Date error

In sum, Gibbs challenged 401 signatures.

Following staff’s face review, Banfield was left with a “cushion” of 354 signatures—the number of signatures Banfield had in excess of the number needed to appear on the ballot. Because the number of signatures challenged exceeded Banfield’s cushion, staff processed the challenge as described below.

392 of the challenges were circulator challenges where Gibbs argued the circulator did not correctly identify their city or township of residence. Gibbs argued that under *Wickman v Norway Twp Clerk*,<sup>3</sup> these circulator errors render all signatures on the affected petition sheets invalid.

In *Wickman*, the court held that the circulator failed to strictly comply with the requirements in MCL 168.544c(1) by failing to include his city or township when completing the circulator certificate. Specifically, the circulator wrote Vulcan on the line for city or township. Vulcan is an unincorporated village that has postal addresses in both Norway Township and Waucedah Township. The circulator was a registered voter in Waucedah Township, and the Court held that under MCL 168.544c he was required to indicate Waucedah Township on the circulator certificate. While the Court held that the circulator in *Wickman* could not indicate his postal address—the village of Vulcan—instead of his township on the circulator certificate under the requirements of MCL 168.544c, it did not hold that a postal address is never acceptable under MCL 168.544c. Rather, the fact that the circulator’s postal address was an **unincorporated village** straddling two townships rendered the listing of his particular postal address noncompliant with the requirement in MCL 168.544c to include a city or township.

Generally, Gibbs did not argue that the circulators indicated an unincorporated village in place of their city or township of residence (which would be a violation of the rule in *Wickman*); rather, he argued that a circulator could not indicate their mailing address instead of their registration address.<sup>4</sup> For instance, he submitted the following challenges:

- Circulator failed to place proper jurisdiction in Circulator's City or Township section, putting mailing address instead of registered jurisdiction. Oak Shore Drive is in Green Oak Township, not the City of South Lyon (which is in Oakland County).
- Circulator failed to place proper jurisdiction in Circulator's City or Township section, putting mailing address instead of registered jurisdiction. Highcrest Drive is in Genoa Township, not Brighton.

Staff understands *Wickman* to be limited to the factual scenario addressed by the Court in that case; specifically, a circulator certificate that lists an unincorporated village in the space for the city or

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<sup>2</sup> Cross-out is an invalid reason for challenge; because a crossed-out signature effectively removes the signature, a crossed-out signature line is treated the same as a blank signature line and is not counted toward the total number of signatures submitted nor the number removed from that submission number. Once the cross-out challenge was removed, Gibbs challenged 396 signatures.

<sup>3</sup> The reporter citation has not yet been assigned. The decision was issued by the Michigan Court of Appeals on July 18, 2024, docket number 367743.

<sup>4</sup> Staff notes that it appears Gibbs’ challenge submission was incomplete. The document explaining the challenge consists of two pages, and the last sentence on the first page is not completed on the second page. Staff contacted Gibbs on April 30 to obtain the complete challenge, but Gibbs has not responded to date.

township. Nothing in *Wickman* or MCL 168.544c prohibits a circulator from using a mailing address when the mailing address is a city or township.

Staff reviewed all circulator jurisdictions challenged by Gibbs. While the majority of the challenged circulators indicated their post office city or township in place of their registration jurisdiction, one circulator indicated the unincorporated community of Gregory, in Washtenaw County (instead of her registration jurisdiction of Lyndon Township), and one indicated the unincorporated community of Germfask, in Mackinac County (instead of her registration jurisdiction of Portage Township). This error invalidated 47 signatures.

<b>Total number of facially valid signatures after face review</b>	<b>954</b>
Circulator information missing (failure to include the circulator name or complete residential address; circulator did not sign or date petitions)	Less: 47
<b>Total facially valid after processing challenge</b>	<b>907</b>

Because the challenge reason cited by Gibbs was not a valid reason for the remainder of circulator challenges, staff rejects the remaining 345 challenges.

Following the removal of those 345 challenges, as well as the five challenges to crossed-out signatures, which is not a valid reason for a challenge, four signature challenges remained in the challenge. At that point, even if all remaining challenges were accepted, Banfield would be left with 903 facially valid signatures. Because the valid challenge categories did not call more than 303 signatures into question, it was not necessary for staff to process the remainder of the challenge.

Banfield responded to the challenge, arguing, similarly to staff's determination, that the majority of circulators indicated their city or township, even if they did not indicate their registration jurisdiction, and thus they did not run afoul of *Wickman*. Additionally, Banfield argued that *Wickman* does not apply to nominating petitions, as certain portions of the opinion depend on language in MCL 168.482, which applies to ballot question petitions (and which is not present in MCL 168.544, which governs nominating petitions). Because Banfield had a sufficient number of facially valid signatures even after the challenge, it was not necessary for staff to consider the response.

**Staff recommendation:** Determine petition sufficient.