
FORMAL REQUEST FOR IMMEDIATE DISCLOSURE, DISQUALIFICATION REVIEW, AND RECORD PRESERVATION

Concerning Project Flex and Applicant-Sponsored Hospitality

TO: Lyon Township Board of Trustees
58000 Grand River Avenue, New Hudson, Michigan 48165

COPY TO: Township Clerk; Planning Commission Chair; Township Attorney

FROM: John Valenzuela, Lyon Township Resident

DATE: August 5, 2026

RE: Project Flex — immediate disclosure, conflict-of-interest determination, and preservation of records

Request for Immediate Action

Pursuant to Michigan Compiled Laws § 125.3815(9),¹ I respectfully request that every Lyon Township Planning Commissioner who attended any golf outing, recreational event, meal, trip, or other event sponsored, hosted, paid for, or subsidized by Verrus, Walbridge, or any person or entity acting on behalf of Project Flex make a complete disclosure on the public record.

The disclosure should identify:

1. The date, time, and location of the event;
2. The person or entity that extended the invitation;
3. Every Project Flex representative, Township official, Planning Commissioner, consultant, and other attendee known to have participated;
4. Who paid for or subsidized the green fees, registration fees, food, beverages, transportation, lodging, gifts, or any other expenses or benefits;
5. The approximate fair-market value of every benefit received by each public official;
6. Whether the official personally paid for, reimbursed, or offered to reimburse any portion of the expense, including the date and amount of any reimbursement;
7. Whether Project Flex, its pending site-plan application, any approval condition, easement, drainage issue, noise issue, or other Township matter was discussed; and
8. All communications concerning Project Flex that occurred before, during, or after the event, including communications through email, text message, telephone, messaging application, or in-person conversation.

Conflict-of-Interest and Disqualification Determination

Before any additional Project Flex discussion, deliberation, motion, recommendation, or vote, I further request that the Township take the following actions:

1. Require the affected Planning Commissioners to disclose the potential conflict of interest in an open meeting and ensure that the disclosure is entered fully into the meeting minutes;

¹Michigan Planning Enabling Act, MCL 125.3815(9). See the [official Michigan Legislature text](#).

2. Require the remaining, unaffected Planning Commissioners to determine on the public record whether either affected member must be disqualified under MCL 125.3815(9), the Planning Commission bylaws, any applicable Township ordinance, and any applicable ethics or gift policy;
3. Direct the affected members to refrain, pending that determination, from all Project Flex discussions, deliberations, motions, communications with other commissioners, communications with Township consultants, and voting;
4. Identify every Project Flex meeting, discussion, review, recommendation, or vote in which either affected member participated after the event, so that the Township can determine whether any prior action requires reconsideration by an unconflicted decision-making body; and
5. Obtain an independent written legal opinion from counsel who has not represented the applicant and has not participated in advising the Township concerning the Project Flex application, addressing disclosure, disqualification, prior participation, and the appropriate remedy.

Preservation of Records

The Township should immediately preserve all potentially relevant public records, regardless of whether they are stored on Township systems, personal devices, personal accounts, or third-party platforms used to conduct Township business. The preservation directive should include, at a minimum:

1. Emails, text messages, messaging-application communications, voicemails, calendar entries, contact records, and telephone logs;
2. Invitations, registration records, attendee lists, sponsor lists, invoices, receipts, expense reports, reimbursement records, photographs, and video recordings;
3. Communications among Planning Commissioners, Township officials, Township employees, Township consultants, Verrus, Walbridge, Project Flex representatives, and event organizers; and
4. Drafts, notes, memoranda, legal opinions, and internal communications concerning the outing, potential conflicts of interest, disclosure, recusal, disqualification, or Project Flex.

Requested Disposition

I respectfully request that this document be entered into the Township's official public record, distributed to every member of the Board of Trustees and Planning Commission, and addressed in an open meeting before any further Project Flex deliberation or vote. I also request written confirmation that a preservation notice has been issued and that the disclosure and disqualification process described above will occur before further action on the application.

Scope of this request. This request seeks disclosure, fact-finding, preservation of evidence, and a lawful conflict-of-interest determination. It does not presume a final finding of misconduct and should not be construed as an allegation that any criminal offense has been established.

John Valenzuela
Lyon Township Resident

Date

This document is a citizen request for governmental review and is not a substitute for legal advice.