



STATE OF MICHIGAN  
RUTH JOHNSON, SECRETARY OF STATE  
DEPARTMENT OF STATE  
LANSING

October 2, 2015

Richard LeBlanc  
36267 Canyon Drive  
Westland, Michigan 48185

Dear Mr. LeBlanc:

The Department of State (Department) received a formal complaint filed by Bill Campbell against you, alleging that you violated the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.201 *et seq.* The investigation and resolution of this complaint is governed by section 15 of the Act and the corresponding administrative rules, R 169.51 *et seq.* Copies of the complaint and supporting documentation are enclosed with this letter.

The MCFA prohibits a candidate committee from making a "contribution to or an independent expenditure in behalf of another candidate committee." MCL 169.244(2). A knowing violation of section 44 is a misdemeanor punishable by a fine, imprisonment, or both. MCL 169.244(5).

Additionally, in Michigan it is unlawful for a public body or an individual acting on its behalf to use or authorize the use of "funds, personnel, office space, computer hardware or software, property, stationery, postage, vehicles, equipment, supplies, or other public resources to make a contribution or expenditure [.]" MCL 169.257(1). A knowing violation of section 57 is a misdemeanor offense. MCL 169.257(3).

Mr. Campbell alleges that your candidate committee paid for a mailer which endorsed Jim Godbout, Bill Johnson, Adam Hammons, and Dewey Reeves for City Council. Mr. Campbell further alleges that you unlawfully used public resources by assembling and posing with city personnel and city-owned resources to take pictures for use in your campaign material.

In support of his complaint, Mr. Campbell provided a copy of a mailer which states "I hope you'll also agree to support the re-election effort of each incumbent Council Member [.]" and contains a mock absentee ballot with the incumbents' names marked. The mailer contains a paid-for-by statement which states "Paid for by: Citizens for Richard LeBlanc [.]" This mailer also appears to contain pictures of you with city police and fire personnel, city equipment, and the Mayor.

The purpose of this letter is to inform you of the Department's examination of these matters and your right to respond to the allegations before the Department proceeds further. It is important to understand that the Department is neither making this complaint nor accepting the allegations as true.

Richard LeBlanc

October 2, 2015

Page 2

**If you wish to file a written response to this complaint, you are required to do so within 15 business days of the date of this letter.** Your response may include any written statement or additional documentary evidence you wish to submit. All materials must be sent to the Department of State, Bureau of Elections, Richard H. Austin Building, 1<sup>st</sup> Floor, 430 West Allegan Street, Lansing, Michigan 48918. If you fail to submit a response, the Department will render a decision based on the evidence furnished by the complainant.

A copy of your answer will be provided to Mr. Campbell, who will have an opportunity to submit a rebuttal statement to the Department. After reviewing all of the statements and materials provided by the parties, the Department will determine whether “there may be reason to believe that a violation of [the MCFA] has occurred [.]” MCL 169.215(10). Note that the Department’s enforcement powers include the possibility of entering a conciliation agreement, conducting an administrative hearing, or referring this matter to the Attorney General for enforcement of the criminal penalties provided in sections 44(5) and 57(3) of the Act.

If you have any questions concerning this matter, you may contact me at (517) 241-0395.

Sincerely,



Lori A. Bourbonais  
Bureau of Elections  
Michigan Department of State

c: Bill Campbell



## Michigan Department of State Campaign Finance Complaint Form

**Reset Form**

This complaint form may be used to file a complaint alleging that someone violated the Michigan Campaign Finance Act (the MCFA, 1976 PA 388, as amended; MCL 169.201 *et seq.*).

**Please print or type all information.**

I allege that the MCFA was violated as follows:

Section 1. Complainant		
Your Name <b>William Campbell</b>	Daytime Telephone Number <b>734 641 8428</b>	
Mailing Address <b>36620 Newberry Estates</b>		
City <b>Westland</b>	State <b>Mi</b>	Zip <b>48185</b>

Section 2. Alleged Violator		
Name <b>Richard LeBlanc</b>		
Mailing Address <b>36267 Canyon Drive</b>		
City <b>Westland</b>	State <b>Mi</b>	Zip <b>48185</b>

<b>Section 3. Alleged Violations</b> (Use additional sheet if more space is needed.)
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Section(s) of the MCFA violated: 169.244 Prohibited contributions or expenditures; delivery or return of contribution; joint fund-raiser; violation as misdemeanor; penalty. Sec. 44 And Mcl 169.257

Explain how those sections were violated:

**See Attached Sheet.**

Evidence that supports those allegations (attach copies of pertinent documents and other information):

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**Section 4. Certification (Required)**

*I certify that to the best of my knowledge, information, and belief, formed after a reasonable inquiry under the circumstances, each factual contention of this complaint is supported by evidence.*

X

*(Signature)*  
Signature of Complainant

9/23/15  
Date

**Section 5. Certification without Evidence (Supplemental to Section 4)**

Section 15(6) of the MCFA (MCL 169.215) requires that the signed certification found in section 4 of this form be included in every complaint. However, if, after a reasonable inquiry under the circumstances, you are unable to certify that certain factual contentions are supported by evidence, you may also make the following certification:

*I certify that to the best of my knowledge, information, or belief, there are grounds to conclude that the following specifically identified factual contentions are likely to be supported by evidence after a reasonable opportunity for further inquiry. Those specific contentions are:*

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

X

\_\_\_\_\_ Signature of Complainant

\_\_\_\_\_ Date

Section 15(8) of the MCFA provides that a person who files a complaint with a false certification is responsible for a civil violation of the MCFA. The person may be required to pay a civil fine of up to \$1,000.00 and some or all of the expenses incurred by the Michigan Department of State and the alleged violator as a direct result of the filing of the complaint.

Mail or deliver the completed complaint form and evidence to the following address:

Michigan Department of State  
Bureau of Elections  
Richard H. Austin Building – 1st Floor  
430 West Allegan Street  
Lansing, Michigan 48918

9/22/2015

Dear Ms. Bourbonais,

RECEIVED/FILED  
MICHIGAN DEPT OF STATE

2015 SEP 24 PM 4: 02

ELECTIONS/GREAT SEAL

I would like to add this new complaint regarding the following Candidates: Mr. Richard LeBlanc for Westland City Clerk, Mr. Bill Johnson, Mr. Dewey Reeves, Mr. Adam Hammons, Mr. James Godbbout (incumbents for Westland City Council) to my current case regarding Westland violations of Michigan Election law and the purity of this election.

Mr. LeBlanc has been a **Politician for a very long time** and has violated: Act 388 of 1976: 169.244 section 2 : A candidate committee shall not make a contribution to or an independent expenditure in behalf of another candidate committee..

Mr. Le Blanc's flyer on page two states: "As you vote your Absentee ballot, I hope you'll also agree to support and the re-election effort of each incumbent Council Member." If you note the fake absentee ballot and (continued absentee ballot theme in Westland) with our city incumbent names circled. On page one Mr. Le Blanc states: Continuing to conduct impartial elections etc..??? I can tell you as a candidate Mr. LeBlanc makes me concerned not unlike our current clerk. How can someone running for a Non-political seat, tell voters to "SUPPORT" Westland incumbents by name and yet state he will be impartial if elected? I would like to know how many flyers where sent out on behalf of all 4 incumbents? Only Mr. LeBlanc's committee has paid for this flyer. The incumbent council members committee's are not listed? This is yet, another infraction of Michigan campaign finance Act .

Mr. LeBlanc has also violated Sec. 44 of Mcl 169.257 it is unlawful that a public body or an individual acting for a public body shall not use or authorize the use of funds, personnel, office space, property, stationery, postage, vehicles, equipment, supplies, or other public resources to make a contribution or expenditure or provide volunteer personal services to further the nomination or election of a candidate or the qualification, passage or defeat of a ballot question. Mr. LeBlanc is using City resources- Police, Fire personnel with city equipment and even pictures with our Mayor on school grounds.

I respectfully, ask the State to enforce election law and monitor this election, especially the absentee ballots and this arrogant behavior from Westland elected and former elected officials.

Thank you for your time,

Regards,

Bill Campbell



# \*\*\* LeBlanc

RICHARD

FOR WESTLAND CITY CLERK



## A message from Richard LeBlanc

Thank you for supporting my candidacy for Westland City Clerk during the August Primary Election. I would be honored to again receive your vote during the November 3rd General Election.

The Clerk's office has numerous responsibilities. While many procedures will remain as they are, I've been asked for examples of efficiencies or improved service items I'll work toward if I become elected. Here's just a few:

- An Online Business Licensing and Permit Process. This will allow people to apply for and pay for their licenses and permits electronically while seated in their office or home.
- An electronic version of City Council meeting documents. Citizens could follow along with the meetings -- viewing the same public paperwork provided to Council members -- from their smart phone, tablet, or laptop while seated at home, or in the audience at a Council meeting.
- Development of video tutorials, voter awareness programming, and other content relative to the operation of the Clerk's office, elections, licensing, and more.
- Continuing to conduct impartial elections, providing transparent access to information, ensuring privacy concerns are adhered, and doing it with minimal staff.

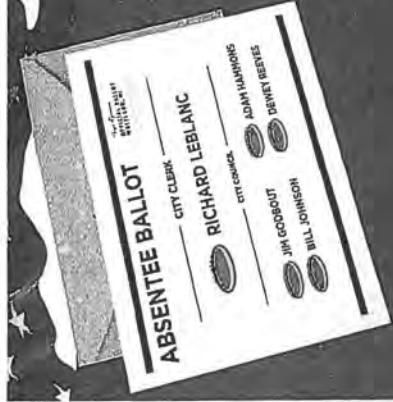
Expanding public access to municipal information, combined with enhanced self-service solutions, will strengthen our community. My pledge is to provide consistent service delivery while maintaining a high level of professionalism, transparency, and accountability.

## VOTE ABSENTEE TODAY!

★★★  
**Richard LeBlanc**  
 FOR CITY CLERK

Paid for by:  
 Citizens for Richard LeBlanc  
 36267 Canyon Drive  
 Westland, MI 48186  
 734-729-0667

PRRST STD  
 U.S. POSTAGE  
**PAID**  
 Permit #238  
 Wyandotte, MI



**CAST YOUR BALLOT for LEBLANC**

**SEND IN YOUR BALLOT TODAY**

**Keep Westland moving forward**

When my wife Cheryl and I chat with friends and others, we often reflect on how much our community has progressed within the past few years. Central City Park is now home to a Farmers Market and children's Spray Park that is unmatched anywhere in Michigan. Our new City Hall, new Fire Station #1, and a renovated Police Station - along with new programming within the Jefferson-Barnes Vitality Center - are the envy of other towns. And all of this happened within our existing budget.

While other communities were scaling back, Westland was charging forward. Whether partnering with other communities, or making advancements internally, the existing team of City Council Members, Mayor, employees and staff, have worked together on our behalf - and there's more to come.

I'm pleased that the entire City Council, Mayor Wild, City Clerk DeHart-Schoof, numerous organizations and others have endorsed my election as our next City Clerk. It would be a privilege to receive your support, too.

As you vote your Absentee Ballot, I hope you'll also agree to support the re-election effort of each incumbent Council Member.

[/repleblanc](https://repleblanc.com) | [Richard@RichardLeBlanc.com](mailto:Richard@RichardLeBlanc.com)







STATE OF MICHIGAN  
RUTH JOHNSON, SECRETARY OF STATE  
DEPARTMENT OF STATE  
LANSING

October 23, 2015

Bill Campbell  
36620 Newberry Estates  
Westland, Michigan 48185

Dear Mr. Campbell:

The Department of State received a response to the complaint you filed against Richard LeBlanc, which concerns alleged violations of the Michigan Campaign Finance Act (MCFA), 1976 P.A. 388, MCL 169.201 *et seq.* A copy of the response is provided as an enclosure with this letter.

If you elect to file a rebuttal statement, you are required to send it within 10 business days of the date of this letter to the Bureau of Elections, Richard H. Austin Building, 1<sup>st</sup> Floor, 430 West Allegan Street, Lansing, Michigan 48918.

Sincerely,

A handwritten signature in cursive script that reads "Lori A. Bourbonais".

Lori A. Bourbonais  
Bureau of Elections  
Michigan Department of State

c: Richard LeBlanc

**Richard LeBlanc**  
36267 Canyon Drive  
Westland, MI 48186  
(734) 729-0667  
[Richard@RichardLeBlanc.com](mailto:Richard@RichardLeBlanc.com)

BUREAU OF ELECTIONS  
2015 OCT 19 P 2: 52  
DEPT OF STATE

October 12, 2015

State of Michigan  
Ruth Johnson, Secretary of State  
Richard H. Austin Building – 1st Floor  
430 West Allegan  
Lansing, MI 48918

Attn: Lori A. Bourbonais, Bureau of Elections

Re: Response to formal complaint filed by Bill Campbell

Dear Ms. Bourbonais:

Please be advised I received on October 09, 2015, your letter dated October 02, 2015. Please consider this three-page document the complete response to allegations within the complaint.

Your letter and the accompanying copy of the complaint appear to question two items involving the Michigan Campaign Finance Act (MCFA):

- A candidate committee making a contribution to or an independent expenditure in behalf of another candidate committee.
- The use or authorization of public resources to make a contribution or expenditure.

My response will address each item individually.

**The Citizens for Richard LeBlanc committee did not knowingly make a contribution to or an independent expenditure in behalf of another candidate committee.** There has been no known violation and/or infraction of the MCFA committed by the Citizens for Richard LeBlanc committee regarding this allegation.

Regarding the specific piece of literature referenced by Mr. Campbell, permission was not requested of any individual to make statements regarding any person. The professional who designed the literature consulted only me.

If references within the literature are interpreted as a contribution, it was unintended, regrettable, and occurred without specific knowledge that this could be viewed as unallowable. Written checks, limited to the \$100 annual maximum allowed within MCL 169.244(2), are the only known and actual Citizens for Richard LeBlanc committee contributions in behalf of any candidate committee.

The inclusion of reference to incumbent officeholder candidates for elective office (candidate committees were not referenced) was believed to be allowable and not contrary to any governing laws. The committee would not have knowingly violated any provision of the MCFA.

Following a personal review of the MCFA and page 8 of the MERTS Manual utilized as a reference to the MCFA, I found only one direct mention of an "endorsement," as it involves a "candidate committee," expenditure. I viewed this statement: "**Endorsements:** An endorsement is not (in and of itself) a contribution under the MCFA."

The Citizens for Richard LeBlanc committee distributed literature on behalf of only me, the candidate. No flyer distribution occurred in behalf of another candidate committee. No flyer distribution occurred on behalf of incumbent city council members. Advice and consent was not sought from any other person regarding the distribution of this specific piece of literature. No committee or candidate other than the Citizens for Richard LeBlanc committee and me hold responsibility for that specific piece of literature.

The above statements respond the first allegation.

As for the second allegation, **the Citizens for Richard LeBlanc committee did not knowingly use or authorize public resources to make a contribution or expenditure.** There has been no known violation and/or infraction of the MCFA committed by the Citizens for Richard LeBlanc committee regarding this allegation.

MCL 169.211(7) provides a definition of "Public body." The Citizens for Richard LeBlanc committee, and myself as the candidate for a different elective office than currently held, are not a, "public body," as defined by the MCFA. The committee does not act on behalf of the city of Westland, and no known entity or person authorized the use of any public resources to make a contribution or expenditure to the Citizens for Richard LeBlanc committee.

Relative to the "assembling and posing with city personnel and city-owned resources to take pictures for use in [my] campaign material," please be advised each of the photographs presumed to be referenced by Mr. Campbell were taken during events open and available to the public. Each of these events were publicized, participation was offered to any interested person, and while one of the events required paid attendance, none violated any law or ordinance.

Every photograph within the referenced specific piece of literature that includes more than one person was taken during a public activity or event held within the city of Westland that was open to all citizens. As an elected official, I am often asked to become photographed with others, and the resulting photographs are utilized in various ways privately, politically, socially, and within the public domain.

In order, top to bottom, beginning with the front side of the referenced piece of literature, these are the public activities associated with each photograph:

- Habitat for Humanity event – June 17, 2015, at 35531 Booth, Westland, MI. Numerous members of the public and the press attended. Numerous photographs of others were

taken in the same location as this one, including those by local news agencies. Only two elected officials (myself and one other) attended.

- A benefit to honor late Westland Fire Fighter Brian Woehlke who was killed in the line of duty. With personal funds, I purchased a ticket to this June 26, 2015, event held at the Hellenic Cultural Center in Westland. Several hundreds of people attended, but only three elected officials (myself and two others) were there. I observed several attendees being asked to have a remembrance photo of their support taken in the presence of Fire Fighters. Numerous photographs of others were taken in the exact same location.

- Police K9 "Friday" Retirement – April 21, 2014 City Hall, Westland, MI. Approximately 75 citizens attended, including several elected officials. Numerous photographs of others were taken in the exact same location, and with the same police sergeant (and K9 Friday) as this one.

- In a Westland city park with a resident – August 12, 2015. This is the only known photograph in this location with this friend, although numerous other residents were also in the park.

- Westland Farmers Market Grand Opening – August 14, 2014. Numerous elected officials and members of the public attended. Numerous photographs of others were taken in the same vicinity as this one.

- Westland Jefferson-Barns Vitality Center Celebration – August 14, 2015. Numerous elected officials and members of the public attended. Numerous photographs of others were taken in the same location and vicinity as this one.

The Citizens for Richard LeBlanc committee, and me as the candidate, did not knowingly violate any provision governing communication with the electorate. However, please be advised if the Department of State, Bureau of Elections declares a knowing violation has occurred, the committee, and the candidate, shall comply immediately with all requirements to satisfy the penalty.

Thank you for receiving this response.

Regards,

A handwritten signature in black ink, appearing to read 'Richard LeBlanc', written in a cursive style.

Richard LeBlanc



STATE OF MICHIGAN  
RUTH JOHNSON, SECRETARY OF STATE  
DEPARTMENT OF STATE  
LANSING

December 17, 2015

Richard LeBlanc  
36267 Canyon Drive  
Westland, Michigan 48185

Dear Mr. LeBlanc:

This letter concerns the complaint that was recently filed against you by Bill Campbell, which relates to a purported violation of the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.201 *et seq.* The Department of State has received a rebuttal statement from the complainant, a copy of which is enclosed with this letter.

Section 15(10) of the MCFA, MCL 169.215(10), requires the Department to determine within 60 business days from the receipt of the rebuttal statement whether there is a reason to believe that a violation of the Act has occurred. Mr. Campbell's complaint remains under investigation at this time. At the conclusion of the review, all parties will receive written notice of the outcome of the complaint.

Sincerely,

A handwritten signature in cursive script that reads 'Lori A. Bourbonais'.

Lori A. Bourbonais  
Bureau of Elections  
Michigan Department of State

c: Bill Campbell



## **Bourbonais, Lori (MDOS)**

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**From:** Bill Campbell <wcampbell2009@yahoo.com>  
**Sent:** Monday, November 09, 2015 9:19 AM  
**To:** Bourbonais, Lori (MDOS)  
**Subject:** LeBlanc Response  
**Attachments:** Scan0024.jpg; Scan0023.jpg; IMG\_1025.JPG; IMG\_1026.JPG; 10988326\_519730081520459\_6768829776428642662\_o.jpg; 12141117\_519730058187128\_6282960276938074225\_o.jpg; Scan0045.jpg; Scan0044.jpg

Lori, my mailed response came back in the mail due to postage. Here is my response.

Dear Ms. Bourbonais:

Regarding Mr. LeBlanc's Candidate Committee violation, his flyer is among one of many flyers sent out by the opposing 4 candidates, not to mention the "PAC" Westland Firefighters separate segregated fund" and the independent committee for responsible government since I started this process. Bottom line, all 4 candidates and these committees ran as group.. For Mr. LeBlanc to simply say: "No flyer distribution occurred in behalf of another candidate committee". is shocking when he is telling voters to re-elect the incumbents' on his flyer. He also uses the same term or slogan "Keep Westland moving forward".

The candidate handbook is very clear:

**Endorsements:** An endorsement is not (in and of itself) a contribution under the MCFA. An organization such as a corporation, labor organization, domestic dependent sovereign or committee can endorse a candidate. However, the expense to communicate the endorsement may be considered a contribution to a candidate committee. Therefore, committees and organizations must be in compliance with the MCFA when making expenditures to communicate an endorsement. If the candidate committee alone makes expenditures to communicate the endorsement, no violation of the MCFA can occur.

No such expenditure was logged by the 4 city council incumbents. Their committee name is not listed therefore they are not in compliance **on all of the political flyers sent out by Mr. LeBlanc and the incumbents** .

Further, Mr. LeBlanc lists who has endorsed him, then he states on his flyer " As you vote your absentee ballot, I hope you'll also agree to support the re-election effort of each incumbent (graphic of a ballot)". All of these candidates ran as a ticket. The Westland political machine out spent and out manned the non-incumbents in combination with the police and fire PAC and the independent committee for responsible government -which is tied to our city assessor. The purity of this election was compromised.

With regards to city vehicles' and uniformed police and fire- specifically the fire rescue unit it is par for the course in Westland. If "said" picture was indeed taken at the benefit to honor our fallen fire fighter it is hard to deduce that from the cropping of the picture. I find it hard to believe the city would let a Rescue unit at a evening event. I also find it odd everyone smiling at such a solemn event? It is a fact, unfortunately the fire and police did not back the non-incumbents. They say on their own flyer: "Vote for Candidates who support public safety in Westland". The Non-incumbents have always been for more public safety. The simple take-away is if you're not in the club or endorsed by them you don't get the red carpet treatment.

Kind Regards,



Bill C.

Attached: incumbent flyers- they have unique fronts but the backs are all the same.

Attached 2: is Fire flyer 1 with Mr. Johnson committee mark.

Attached 3: is the almost the same Fire fighter flyer paid by their PAC.

★ REFLECT ADAMI ★

# HAMMONS

## CITY COUNCIL

### A message from City Council President Pro-Tem Adam Hammons

It has been my distinct honor to serve the residents of Westland as a member of The City Council since 2009. I also proudly served as a member of the Westland Planning Commission from 07-2008. I am a longtime Real Estate Professional and my wife Melissa and I are proud parents of three incredible young boys Nolan (7), Levi (3), Landon (1).

I have dedicated myself to working with Mayor Wild and my City Council colleagues to move the city forward during some of the State of Michigan's toughest times. I respectfully ask for your vote for re-election on Tuesday, November 3rd.

**Notable achievements:** 3yr Balanced Budget w/Surplus, New City Hall, New Fire Station, New Farmers Market, Tattan Park Improvements, Remediated Central City Park, Improved Nankin Transit Bus Service, Combined 17 new Police Officers and Firefighters, Roads and Sewer Improvements, Curbside Recycling, Improving Property Values, Added 8 Additional Ordinance/Animal Control Officers, Norwayne Investments, New LED Lights

#### Goals:

- ★ Improve Property Values
- ★ Keep Taxes Low
- ★ Stabilize Water Rates
- ★ Add Additional Police and Fire
- ★ Improve Special Trash Pickup Program
- ★ Improve Neighborhood Roads
- ★ More Recreational Opportunities
- ★ Improve Sewer Infrastructure
- ★ Maintain Incredible Senior Services
- ★ Bring more jobs to City

#### Key Endorsements:

Mayor William R. Wild · City Clerk Eileen Dehart-Schoof  
City Council Members; Godbout · Johnson · Reeves · Kehrler · Cicirelli-Bryant  
State Representative Robert Kosowski · Former State Senator Glenn Anderson  
Westland Firefighters · Westland Lieutenants and Sergeants · POAM · Westland UAW Local 174  
Westland AFSCME 1602 · UAW Region-1A · Westland Observer and numerous residents!



# I respectfully ask for your vote on November 3rd.

# Here's what Westland's most trusted leaders are saying...

"Our All American City is in the midst of an incredible renaissance and I need positive individuals who will work with me to keep up the momentum. Councilmen Hammons, Reeves, Godbout and Johnson along with Richard LeBlanc for City Clerk, are the experienced leaders we need to keep Westland moving forward."



**Mayor  
William R. Wild**

"Councilmen Hammons, Reeves, Godbout and Johnson have worked hard for the turnaround of Westland and have my strong support. Richard LeBlanc has been a close friend, a proven leader and will make a great City Clerk. Please join me in voting for Hammons, Reeves, Godbout, Johnson and LeBlanc."



**Former State Senator  
Glenn Anderson**

"My colleagues in Lansing continue to be amazed at the incredible turnaround of Westland and all of the incredible things happening here. I credit the positive working relationship between Mayor Wild and the City Council. Join me in supporting Councilpersons Hammons, Reeves, Godbout and Johnson along with Richard LeBlanc for City Clerk."



**State Representative  
Robert Kosowski**

## VOTE NOVEMBER 3RD



**Adam  
Hammons  
Councilman**



**Dewey  
Reeves  
Councilman**



**James  
Godbout  
Councilman**



**Bill  
Johnson  
Councilman**



**Richard  
LeBlanc  
City Clerk**

### The Right Team to Move the City Forward

*"Hammons, Reeves, Godbout and Johnson have proven a clear understanding of what needed to be done to address Westland's looming financial crisis. They asked the difficult questions and made the difficult decisions and the end result is a city that is on sound financial footing with an improving infrastructure"...*

**WAYNE-WESTLAND  
OBSERVER**  
July 17, 2015



PAID FOR BY: Friends for Elbert Bill Johnson  
7834 Moonwood - Westland, MI 48185

S2 P1 1622 \*\*\*\*\*AUTO\*\*SCH 5-DIGIT 48185  
TO THE RESIDENTS AT  
36580 NEWBERRY ESTATES DR  
WESTLAND, MI 48185-8307

PRSR-STD  
US POSTAGE  
**PAID**  
PERMIT NO #10  
48185



Here's what Westland's most trusted leaders are saying...

"Our All American City is in the midst of an incredible renaissance and I need positive individuals who will work with me to keep up the momentum. Councilmen Hammons, Reeves, Godbout and Johnson along with Richard LeBlanc for City Clerk, are the experienced leaders we need to keep Westland moving forward."



Mayor  
William R. Wild

"Councilmen Hammons, Reeves, Godbout and Johnson have worked hard for the turnaround of Westland and have my strong support. Richard LeBlanc has been a close friend, a proven leader and will make a great City Clerk. Please join me in voting for Hammons, Reeves, Godbout, Johnson and LeBlanc."



Former State Senator  
Glenn Anderson

"My colleagues in Lansing continue to be amazed at the incredible turnaround of Westland and all of the incredible things happening here. I credit the positive working relationship between Mayor Wild and the City Council. Join me in supporting Councilpersons Hammons, Reeves, Godbout and Johnson along with Richard LeBlanc for City Clerk."



State Representative  
Robert Kosowski

**VOTE NOVEMBER 3RD**



Adam Hammons Councilman  
Dewey Reeves Councilman  
James Godbout Councilman  
Bill Johnson Councilman  
Richard LeBlanc City Clerk

**The Right Team to Move the City Forward**

Reeves, Godbout and Johnson have proven a clear understanding of what needed to be done to address Westland's looming financial crisis. They asked the difficult questions and made the difficult decisions and the end result is a city that is on sound financial footing with an improving infrastructure..."



PAID FOR BY: Friends of Dewey K. Reeves  
5540 Fairlawn Ave., Westland, MI 48195

POSTNET PAID PERMIT NO. 4184  
\$2 P1 1422 \*\*\*\*\*ALTO\*\*SCH 5-DIGIT 48185  
TO THE RESIDENTS AT  
36580 HEYBERRY ESTATES DR  
WESTLAND, MI 48165-8307

WAYNE-WESTLAND  
**OBSERVER**  
July 17, 2015

Here's what Westland's most trusted leaders are saying...

"Our All American City is in the midst of an incredible renaissance and I need positive individuals who will work with me to keep up the momentum. Councilmen Hammons, Reeves, Godbout and Johnson along with Richard LeBlanc for City Clerk, are the experienced leaders we need to keep Westland moving forward."



Mayor  
William R. Wild

"Councilmen Hammons, Reeves, Godbout and Johnson have worked hard for the turnaround of Westland and have my strong support. Richard LeBlanc has been a close friend, a proven leader and will make a great City Clerk. Please join me in voting for Hammons, Reeves, Godbout, Johnson and LeBlanc."



Former State Senator  
Glenn Anderson

"My colleagues in Lansing continue to be amazed at the incredible turnaround of Westland and all of the incredible things happening here. I credit the positive working relationship between Mayor Wild and the City Council. Join me in supporting Councilpersons Hammons, Reeves, Godbout and Johnson along with Richard LeBlanc for City Clerk."



State Representative  
Robert Kosowski

**VOTE NOVEMBER 3RD**



Adam Hammons Councilman  
Dewey Reeves Councilman  
James Godbout Councilman  
Bill Johnson Councilman  
Richard LeBlanc City Clerk

**The Right Team to Move the City Forward**

"Hammons, Reeves, Godbout and Johnson have proven a clear understanding of what needed to be done to address Westland's looming financial crisis. They asked the difficult questions and made the difficult decisions and the end result is a city that is on sound financial footing with an improving infrastructure..."



PAID FOR BY: Friends of Bill Johnson  
7811 Lakerwood, Westland, MI 48185

POSTNET PAID PERMIT NO. 4184  
\$2 P1 1422 \*\*\*\*\*ALTO\*\*SCH 5-DIGIT 48185  
TO THE RESIDENTS AT  
36580 HEYBERRY ESTATES DR  
WESTLAND, MI 48165-8307

WAYNE-WESTLAND  
**OBSERVER**  
July 17, 2015

**Here's what Westland's most trusted leaders are saying...**

"Our All American City is in the midst of an incredible renaissance and I need positive individuals who will work with me to keep up the momentum. Councilmen Hammons, Reeves, Godbout and Johnson along with Richard LeBlanc for City Clerk, are the experienced leaders we need to keep Westland moving forward."



Mayor  
**William R. Wild**

"Councilmen Hammons, Reeves, Godbout and Johnson have worked hard for the turnaround of Westland and have my strong support. Richard LeBlanc has been a close friend, a proven leader and will make a great City Clerk. Please join me in voting for Hammons, Reeves, Godbout, Johnson and LeBlanc."



Former State Senator  
**Glenn Anderson**

"My colleagues in Lansing continue to be amazed at the incredible turnaround of Westland and all of the incredible things happening here. I credit the positive working relationship between Mayor Wild and the City Council. Join me in supporting Councilpersons Hammons, Reeves, Godbout and Johnson along with Richard LeBlanc for City Clerk."



State Representative  
**Robert Kosowski**

**VOTE NOVEMBER 3RD**



**Adam Hammons** Councilman  
**Dewey Reeves** Councilman  
**James Godbout** Councilman  
**Bill Johnson** Councilman  
**Richard LeBlanc** City Clerk

**The Right Team to Move the City Forward**

"Godbout and Johnson have proven a clear understanding of what needed to be done to address Westland's looming financial crisis. They asked the difficult questions and made the difficult decisions and the end result is a city that is on sound financial footing with an improving infrastructure..."

**\* RE-ELECT \***  
**HAMMONS**  
CITY COUNCIL

PAID FOR BY: Citizens to Elect Adam Hammons  
38378 St. Joe Westland, MI 48196

\*\*\*\*\*AUO\*\*SCH 5-DIGIT 48185 \$1 P2.375

TO THE RESIDENTS AT  
36620 HENWERRY ESTATES DR  
WESTLAND, MI 48185-8830



POSTNET  
ZIP POSTAGE  
PAID  
PERMIT NO. 18  
48185

WAYNE-WESTLAND  
**OBSERVER**  
July 17, 2015

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**Re-Elect Councilman**  
**GODBOUT**

PAID FOR BY: Citizens for James Godbout  
38483 Alton Lane Westland, MI 48185

52 P1 1622 \*\*\*\*\*AUO\*\*SCH 5-DIGIT 48185  
TO THE RESIDENTS AT  
26580 HENWERRY ESTATES DR  
WESTLAND, MI 48185-8307

POSTNET  
ZIP POSTAGE  
PAID  
PERMIT NO. 18  
48185

WAYNE-WESTLAND  
**OBSERVER**  
July 17, 2015

VOTE FOR

CANDIDATES WHO

SUPPORT

PUBLIC SAFETY



Bill Johnson  
City Council



Davey Reeves  
City Council



Adam Hammons  
City Council



Jim Goddard  
City Council



Richard Lee  
City Clerk



# On November 3rd, Vote

- Bill Johnson, City Council
- Dewey Reeves, City Council
- Adam Hammons, City Council
- Jim Godbout, City Council
- Richard Lohman, City Clerk

IN WESTLAND POLICE AND FIREFIGHTERS SUNDAY  
VOTES WHO ARE THE RIGHT CHOICE FOR PUBLIC

Printed by Friends of Bill Johnson, 7034 Moorwood Westland MI 48105



**Bill Johnson**  
City Council



**Dewey Reeves**  
City Council



**Adam Hammons**  
City Council

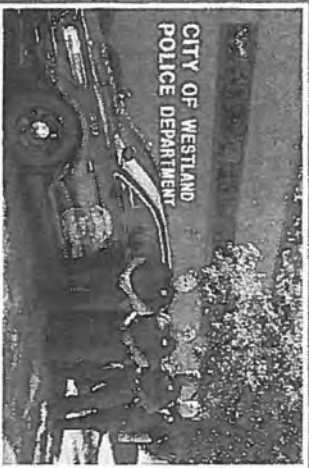


**Jim Godbout**  
City Council



**Richard LeBlanc**  
City Clerk

**✓ VOTE FOR CANDIDATES WHO SUPPORT PUBLIC SAFETY IN WESTLAND**



# On November 3rd, Vote

- Bill Johnson, city council
- Dewey Reeves, city council
- Adam Hammons, city council
- Jim Godbout, city council
- Richard LeBlanc, city clerk

**Why should you support these candidates?**

**Investing in the city, making it a better place to live and raise a family.**

**Five year balanced budget.**

**Hiring Firefighters and Police Officers, increasing the safety of our citizens.**

**Millions of dollars in economic development.**

**Decisions from these candidates have caused significant increases in property values. 12% last year alone.**





STATE OF MICHIGAN  
RUTH JOHNSON, SECRETARY OF STATE  
DEPARTMENT OF STATE  
LANSING

February 12, 2016

Richard LeBlanc  
36267 Canyon Drive  
Westland, Michigan 48185

Dear Mr. LeBlanc:

The Department of State (Department) has completed its initial investigation of the complaint filed against you by Bill Campbell, which alleged that you violated the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.201 *et seq.* This letter concerns the disposition of the complaint.

The MCFA prohibits a candidate committee from making a "contribution to or an independent expenditure in behalf of another candidate committee." MCL 169.244(2). A knowing violation of section 44 is a misdemeanor punishable by a fine, imprisonment, or both. MCL 169.244(5).

The Act also prohibits a public body or an individual acting on its behalf from using or authorizing the use of equipment, supplies, personnel, funds, or other public resources to make a contribution or expenditure. MCL 169.257(1). The words "contribution" and "expenditure" are terms of art that are generally defined to include a payment or transfer of anything of ascertainable monetary value made for the purpose of influencing or made in assistance of the nomination or election of a candidate. MCL 169.204(1), 169.206(1). A person who knowingly violates this provision may be charged with a misdemeanor offense. MCL 169.257(4).

The Act further requires the Department to "endeavor to correct the violation or prevent a further violation by using informal methods [,]" if it finds that "there may be reason to believe that a violation ... has occurred [,]" MCL 169.215(10). The objective of an informal resolution is "to correct the violation or prevent a further violation [,]" *Id.*

Mr. Campbell filed his complaint on September 24, 2015. You filed an answer on October 19, 2015 and Mr. Campbell filed his rebuttal statement on November 9, 2015.

Mr. Campbell alleged that your candidate committee paid for a mailer which endorsed Jim Godbout, Bill Johnson, Adam Hammons, and Dewey Reeves for city council in contravention of the Act. Mr. Campbell further alleged that you unlawfully used public resources by assembling and posing with city personnel and city-owned resources to take pictures for use in your campaign material.

In support of his complaint, Mr. Campbell provided a copy of a mailer, which stated, "I hope you'll also agree to support the re-election effort of each incumbent Council Member [,]" and contained a mock absentee ballot with the incumbents' names marked. Additionally, the mailer

contained pictures of you with city police and fire personnel and city equipment. The mailer contained a paid-for-by statement which indicated that your candidate committee paid for the entire cost of the mailer.

### **Candidate-to-Candidate Contribution**

In response, you stated that your committee “did not knowingly make a contribution to or an independent expenditure in behalf of another candidate committee.” You further stated that the person who designed the mailer consulted with only you. You also stated that if a violation did occur, it was unintended and regrettable. Finally, you stated that because an endorsement is not (in and of itself) a contribution, you believed the statements in your mailer did not give rise to a violation.

The Act expressly prohibits one candidate committee from making a contribution to or an independent expenditure for another candidate committee. MCL 169.244(2). A knowing violation is punishable as a misdemeanor offense. MCL 169.244(5). A contribution is generally defined as a payment of anything of ascertainable monetary value that is made for the purpose of influencing a candidate’s nomination or election to public office. MCL 169.204(1).

By asking voters to support the re-election effort of each incumbent councilmember, you have endorsed those candidates. While it is true that the *endorsement* of a candidate is not a contribution to that candidate, once funds are expended to advertise that endorsement, a contribution to that candidate occurs. By printing your endorsement of other candidates on your mailers and paying for the production and mailing of those mailers, you have made a payment for the purpose of influencing the other candidates’ nomination or election.

The Department finds that the evidence supports a reason to believe that a violation of the Act has occurred. By your admission, you were solely responsible for this mailer and the paid-for-by statement on the mailer indicates it was paid for in its entirety by your committee.

The Department is mandated by the MCFA to “correct the violation or prevent a further violation” by informal methods if it finds that a violation occurred. MCL 169.215(10). To further this objective, **please provide the Department with invoices, receipts, proofs of payment, or any other record maintained by you or your committee that reflects your committee’s charges and payments for these mailers. Please include costs for design, production, and distribution, along with any other cost incurred with regard to this mailer.**

Please provide this material to the Department **on or before March 4, 2016**. After its review of the information, the Department will then determine how to proceed. Please note that if the Department is unable to resolve this matter informally, the Act requires the Department to refer

the matter to the Attorney General or prosecuting attorney for other enforcement action. MCL 169.244(5), MCL 169.215(10)(a).

### **Improper Expenditure of Public Funds**

Mr. Campbell alleged that you improperly expended public funds by using pictures taken of you with city personnel and equipment in campaign literature.

Richard LeBlanc  
February 12, 2016  
Page 3

You explained in your answer that the photographs used in your mailer were taken at public events where numerous photographs of others were taken in the same location or vicinity. You asserted that each photograph was taken during events open and available to the public [,]” each event was publicized, and “participation was offered to any interested person.” No evidence has been offered to the contrary.

Because these pictures were all taken at public events, the Department concludes that no evidence has been offered that shows that an expenditure of public funds was made in connection with the taking of any of the pictures.

Further, if the Department did find that an expenditure had been made in connection with any of the pictures, section 57 of the MCFA contains an exception that allows the use of a public facility if any candidate has the same opportunity to use that facility. MCL 169.257(1)(d). The pictures were taken at public events, and it is the Department’s understanding that many people had their pictures taken in the same locations with the same city personnel and equipment. Further, no evidence has been provided that would support a determination that another candidate was denied the opportunity to have a similar picture taken.

Because the Department finds that the evidence does not support a conclusion that a violation of section 57 occurred, this portion of Mr. Campbell’s complaint is dismissed.

Sincerely,



Lori A. Bourbonais  
Bureau of Elections  
Michigan Department of State



## **Bourbonais, Lori (MDOS)**

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**From:** Richard LeBlanc <leblanc98@aol.com>  
**Sent:** Wednesday, February 17, 2016 11:37 PM  
**To:** Bourbonais, Lori (MDOS)  
**Subject:** Response to disposition letter dated February 12, 2016  
**Attachments:** Page 6.jpg

Dear Ms. Bourbonais:

Please be advised I received your letter requesting information involving expenditures related to the design, production, and distribution of the committee mailing sent on or about September 16, 2015. I respectfully ask the department to allow the Pre-election, General, campaign committee report filed with Wayne County on 11/01/2015, to serve as evidence of all expenditures (copy of relevant portion of page 6 attached).

Design: \$150.00 paid to Apollo Artistry

Production and distribution: \$3124.99 paid to Hess Printing (payments of \$3066.80 and \$58.19)

The above-referenced expenditures represent the entire cost related to the committee mailing.

Upon receiving notice of your decision regarding the informal method of corrective action, I will take immediate action to demonstrate compliance. Thank you for receiving this response.

Regards,  
Richard LeBlanc



**ITEMIZED EXPENDITURES  
SCHEDULE 1B  
CANDIDATE COMMITTEE**

Expenditure Name	Address	Fund Raiser	Purpose	Date	Amount
<b>Debt Payment</b>					
LeBlanc, Richard		<input type="checkbox"/>		08/26/2015	\$26400.00
<b>SubTotal</b>					<b>\$26400.00</b>
<b>Direct</b>					
Al Sultan Restaurant	415 Inkster Road, Garden City, MI 48135	<input type="checkbox"/>	Meeting Expenses	08/26/2015	\$23.31
Apollo Artistry	8033 Arnold Street, Dearborn Heights, MI 48127	<input type="checkbox"/>	Media - Graphic Design	10/16/2015	\$100.00
Apollo Artistry	26025 Cherry Hill Rd, Suite A8, Dearborn Heights, MI 48127	<input type="checkbox"/>	Media - Graphic Design	09/11/2015	\$150.00
Biggby Coffee	36640 Ford Rd, Westland, MI 48185	<input type="checkbox"/>	Meeting Expenses	09/15/2015	\$7.00
Byron Nolen for Mayor	870 Sunningdale Drive, Inkster, MI 48141	<input type="checkbox"/>	Fundraiser - Ticket	09/26/2015	\$50.00
Cellular & More	43821 Ford Rd., Canton, MI 48187	<input type="checkbox"/>	Utilities - Phone / Cell Phone	09/26/2015	\$354.00
Citizens To Elect Adam Hammons	38376 Saint Joe, Westland, MI 48186	<input type="checkbox"/>	Fundraiser - Ticket	09/10/2015	\$100.00
Committee to elect Allen Shuh	35655 park st, Wayne, MI 48184	<input type="checkbox"/>	Fundraiser - Ticket	09/22/2015	\$50.00
Hess Printing	201 Elm, Suite A, Wyandotte, MI 48192	<input type="checkbox"/>	Postage	09/14/2015	\$3066.80
Hess Printing	201 Elm, Suite A, Wyandotte, MI 48192	<input type="checkbox"/>	Postage	09/16/2015	\$58.19
Hess Printing	201 Elm Street, Ste A, Wyandotte, MI 48192	<input type="checkbox"/>	Printing - Brochures	10/14/2015	\$2380.86
John Glenn High School	36105 Marquette, Westland, MI 48185	<input type="checkbox"/>	Sponsors	09/21/2015	\$50.00



STATE OF MICHIGAN  
RUTH JOHNSON, SECRETARY OF STATE  
DEPARTMENT OF STATE  
LANSING

March 4, 2016

Richard LeBlanc  
36267 Canyon Drive  
Westland, Michigan 48185

Dear Mr. LeBlanc:

The Department of State (Department) has concluded its investigation of the complaint filed by Bill Campbell against you, which alleged that you violated the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.201 *et seq.* This letter concerns the disposition of Mr. Campbell's complaint, which was filed on September 24, 2015. You filed an answer to the complaint on October 19, 2015, and Mr. Campbell filed a rebuttal statement on November 9, 2016.

The MCFA and corresponding administrative rules require the Department to ascertain whether there may be "reason to believe that a violation of this act has occurred." MCL 169.215(10), R 169.55(3). The Department has carefully considered the written statements and supporting documentation and has determined that the evidence submitted meets this evidentiary standard. Upon a finding that there may be "reason to believe that a violation of this act has occurred[,]" the Department is required by law to "endeavor to correct the violation or prevent a further violation by using informal methods." MCL 169.215(10).

Mr. Campbell alleged that your candidate committee paid for a mailer which endorsed Jim Godbout, Bill Johnson, Adam Hammons, and Dewey Reeves for city council in contravention of the Act.

The MCFA prohibits a candidate committee from making a "contribution to or an independent expenditure in behalf of another candidate committee." MCL 169.244(2).

By letter dated February 12, 2016, the Department notified you of its determination that the evidence provided supported a reason to believe that a violation of the act had occurred. The Department requested that you provide the Department with invoices, receipts, proofs of payment, and any other record maintained by you or your committee, that reflected charges and payments made for this mailer.

You provided this information to the Department via e-mail dated February 17, 2016. After careful review of the records submitted by you, the Department finds that the evidence supports a conclusion that your committee spent \$3,274.99 on the mailer.

After reviewing the mailer, the Department finds that 7/8<sup>ths</sup> of the mailer contained information for voters that was intended to further your own election and 1/8<sup>th</sup> of the mailer contained

Richard LeBlanc  
March 4, 2016  
Page 2

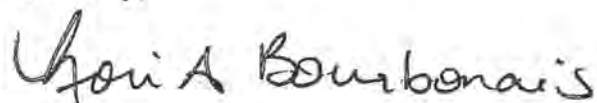
information that was intended to further the election of Mr. Godbout, Mr. Johnson, Mr. Hammons, and Mr. Reeves in contravention of the Act. Because the Department has determined that 1/8<sup>th</sup> of the flyer contained information that was impermissibly paid for by your committee, the Department considers 1/8<sup>th</sup> of the \$3,274.99, or \$409.37, to be the total amount of the improper expenditure made on behalf of the other candidates' committees, or \$102.34 for each candidate committee.

Having made these determinations, the Department must now "endeavor to correct the violation or prevent a further violation by using informal methods." MCL 169.215(10). The Department offers to resolve Mr. Campbell's complaint against you informally through execution of the enclosed conciliation agreement, which requires you to attempt to recover \$102.34 each from the committees of Mr. Godbout, Mr. Johnson, Mr. Hammons, and Mr. Reeves and to pay a civil fine in the amount of \$409.37. **If you wish to enter into the conciliation agreement, please return the original signed document to P.O. Box 20126, Lansing, Michigan 48901-0726, along with payment in full of the \$409.37 fine, on or before March 25, 2016.** Payment must be made by check or money order payable to the State of Michigan; please include the notation, "Conciliation Agreement, Attn: Bureau of Elections" on your check or money order. A copy of the conciliation agreement signed by the Secretary of State's authorized representative will be returned to you promptly.

Please be advised that if the Department is unable to resolve Mr. Campbell's complaint informally, it is required by MCL 169.215(10)-(11) to:

- 1) Refer the matter to the Attorney General with a request that his office prosecute it for the crime of a candidate committee making a contribution to or independent expenditure in behalf of another candidate committee, a misdemeanor violation of MCL 169.244(2); and/or
- 2) Conduct an administrative hearing to enforce the civil penalty provided in MCL 169.215(11), which provides that the Secretary of State may seek a civil fine up to triple the amount of the improper contribution or expenditure plus up to \$1,000.00 per violation.

Sincerely,



Lori A. Bourbonais  
Bureau of Elections  
Michigan Department of State

Enclosure



STATE OF MICHIGAN  
RUTH JOHNSON, SECRETARY OF STATE  
DEPARTMENT OF STATE  
LANSING

PT  
MICHIGAN DEPT. OF STATE  
2016 MAR -9 AM 10:31  
ELECTIONS/GREAT SEAL

**In the Matter of:**

**Richard LeBlanc**  
**36267 Canyon Drive**  
**Westland, Michigan 48185**

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**CONCILIATION AGREEMENT**

Pursuant MCL §169.215(10) of the Michigan Campaign Finance Act (the Act), MCL §169.201 *et seq.*, the Secretary of State Richard LeBlanc(Respondent) hereby enter into a conciliation agreement with respect to certain acts, omissions, methods, or practices prohibited by the Act.

The Secretary of State alleges that there may be reason to believe that Respondent violated MCL §169.244(2) by making improper expenditures in the amount of \$102.34 each on behalf of Jim Godbout, Bill Johnson, Adam Hammons, and Dewey Reeves.

Therefore, Respondent, without admitting any issue of law or fact, except as stated herein, hereby voluntarily enters into this conciliation agreement and assures the Secretary of State that he will comply with the Act and the Rules promulgated to implement the Act.

By executing this conciliation agreement, Respondent certifies that he has (1) attempted to recover \$102.34 each from the candidate committees of Mr. Godbout, Mr. Johnson, Mr. Hammons, and Mr. Reeves and (2) paid in full a \$409.37 fine by check or money order payable to the State of Michigan.

The Secretary of State and Respondent further agree that this agreement is in effect and enforceable for four years from the date it is signed by the Secretary of State or her duly authorized representative.

The Secretary of State and Respondent further agree that this agreement, unless violated, shall constitute a complete bar to any further action by the Secretary of State with respect to the alleged violation that resulted in the execution of this agreement.

The Secretary of State and Respondent further agree that the complaint and investigation that resulted in this agreement are disposed of and will not be the basis for further proceedings, except pursuant to this agreement.

The Secretary of State and Respondent further agree that this agreement will not prevent the Secretary of State from taking action for violations of this agreement.


The Secretary of State and Respondent further agree that Respondent's performance under this agreement shall be given due consideration in any subsequent proceedings.

The Secretary of State and Respondent further agree that this agreement, when signed, shall become a part of the permanent public records of the Department of State.

The Secretary of State and Respondent finally agree that the signatories below are authorized to enter into and bind the parties to this agreement, and have done so by signing this agreement on the date below.

**RUTH JOHNSON**  
**SECRETARY OF STATE**

**RESPONDENT**

  
\_\_\_\_\_  
Christopher M. Thomas, Director  
Bureau of Elections

  
\_\_\_\_\_  
Richard LeBlanc

Date: 3/14/2016

Date: 03/04/2016