



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

November 1, 2012

Shirley Hurni
900 Hogsback Road
Mason, Michigan 48854

Dear Ms. Hurni:

The Department of State (Department) received a formal complaint filed against you filed by Gary Kelterborn, 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 these complaints 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 requires the treasurer of a committee to file complete and accurate finance statements and reports. A person who files an incomplete or inaccurate statement may be subject to a civil fine of up to \$1,000.00. MCL 169.233(10).

Mr. Kelterborn alleges that the campaign statement you filed on behalf of the Democratic Club of Delhi committee (the committee) is inaccurate in its reporting of the committee's cash on hand and the receipt in the amount of \$2,197.00. This receipt was reported as interest. Mr. Kelterborn provided a copy of the committee's amended campaign finance statement filed on August 21, 2012.

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.

If you wish to file a written response to this complaint, you are required to do so within 15 business days of your receipt 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, 1st 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 reply will be provided to Mr. Kelterborn, 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 or conducting an administrative hearing.

Shirley Hurni
November 1, 2012
Page 2

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

Sincerely,

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

Lori A. Bourbonais
Bureau of Elections
Michigan Department of State

c: Gary Kelterborn

**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:

2012 OCT 25

BUREAU OF ELECTIONS
MI DEPT OF STATE

Section 1. Complainant			
Your Name <i>Gary Kelterborn</i>		Daytime Telephone Number <i>517-887-0863</i>	
Mailing Address <i>3600 Creole Way</i>			
City <i>Holt</i>	State <i>MI</i>	Zip <i>48842</i>	

Section 2. Alleged Violator			
Name <i>Shirley Hurni</i>			
Mailing Address <i>900 Hogsback Rd</i>			
City <i>Mason</i>	State <i>MI</i>	Zip <i>48854</i>	

Section 3. Alleged Violations (Use additional sheet if more space is needed.)

Section(s) of the MCFA violated:

MCL 169.226

Explain how those sections were violated:

The committee statement requires reporting of the cash on hand at the beginning and end of the period covered by the statement. The attached campaign statement lists ending balance of last report as \$680.41. During this reporting period the committee lists interest income of \$2197.00. Either the ending balance of the last report or the source listed for the \$2197.00 is clearly erroneous.

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

The attached campaign statement of the committee lists the ending balance of \$680.41 (line 13) but lists the receipt of \$2197.00 (line 4) as interest. If this is not interest then it is an anonymous contribution under MCL 169.241 and shall be given to charity.

In any case, the report is so clearly inaccurate, that Shirley Hurni breached her certification.



MICHIGAN DEPARTMENT OF STATE
BUREAU OF ELECTIONS

BUREAU OF ELECTIONS
MI DEPT OF STATE

360925

Amended 2012 AUG 21 AM 9:48

INDEPENDENT/POLITICAL
COMMITTEE COVER PAGE

FOR OFFICIAL USE ONLY

Report must be legible, typed or printed in ink and signed by the treasurer or designated record-keeper

3. This Statement covers From: 4/21/12 To 7/21/12
Mo Day Year Mo Day Year

1. Committee I.D. Number

3854-7

4. Committee's Mailing Address 900 HOGSBACK RD
MASON, MI 48854
Area Code and Phone 517-676-2031

2. Committee Name

Democratic Club of Delhi

If the address in this box is different from the committee mailing address on the Statement of Organization, mail may be sent to this address by the filing official.

3. Treasurer's Name and Residential Address

SHIRLEY HURNI
900 HOGSBACK RD
MASON, MI 48854

Area Code and Phone 517-676-2031

5. Treasurer's Business Address

N.A.

7. Designated Record Keeper's Name and Mailing Address (If the committee has a Designated Record Keeper)

N.A.

Area Code and Phone

Area Code and Phone

8. TYPE OF STATEMENT:
APPLICABLE TO INDEPENDENT AND POLITICAL COMMITTEES REGISTERED ON STATE LEVEL

APPLICABLE TO INDEPENDENT AND POLITICAL COMMITTEES REGISTERED ON COUNTY LEVEL

APPLICABLE TO INDEPENDENT AND POLITICAL COMMITTEES REGISTERED ON STATE AND COUNTY LEVEL

9. ANNUAL STATEMENTS

Even Year April 25 July 25 October 25
Odd Year January 31 July 25 October 25

8d. ANNUAL STATEMENT (____ Coverage Year)
8e. PRE-ELECTION OR
8f. POST-ELECTION

8g. AMENDMENT TO CAMPAIGN STATEMENT ;
(Complete item 8a, 8b, 8c, 8d, 8e, 8f or 8f to indicate which Statement is being amended)

10. QUARTERLY STATEMENTS

CAUCUS COMMITTEES (ONLY)
 January 31 April 25
 July 25 October 25

Pre-Election or Post-Election Statement relates to:
 PRIMARY GENERAL
 CONVENTION SCHOOL
 SPECIAL CAUCUS

8h. DISSOLUTION OF COMMITTEE
Effective Date of Dissolution: _____
Month Day Year

11. SPECIAL ELECTION INDEPENDENT EXPENDITURE REPORT

Date of Election, Convention or Caucus:
Month Day Year

By checking item 8h, I certify that the committee has no assets or outstanding debts, including late filing fees. **NOTE:** The disposition of residual funds must be reported on Schedule 2B and the Summary Page

A committee that does not have a Reporting Waiver must file all required Campaign Statements. The Campaign Statements must include all applicable schedules: Direct contributions, in-kind contributions, loans, expenditures and outstanding debts count against the \$1,000 Reporting Waiver threshold. If any of the information listed in items 2, 4, 5, 6 or 7 has changed since the information was shown on the committee's Statement of Organization, an amendment to the Statement of Organization should accompany this Campaign Statement. If a request for a Reporting Waiver is not received on or before the filing deadline of a required campaign statement, that campaign statement can not be waived.

Declaration: I certify that all reasonable diligence was used in the preparation of this statement and attached schedules (if any) and to the best of my knowledge and belief the contents are true, accurate and complete.

Current Treasurer or Designated Record Keeper Shirley Hurni
Type or Print Name

Shirley Hurni Signature Date 7/18/12
Mo Day Year



1. Committee I.D. Number 3854-7
2. Committee Name Democratic Club of Detroit

**SUMMARY PAGE
INDEPENDENT OR POLITICAL COMMITTEE**

RECEIPTS	Column I This Period	Column II Cumulative for Calendar Year
3. Contributions		
a. Itemized Contributions (Schedule 2A, Column 6 + Schedule 2A-2, Column 8)	(3a.) \$ _____	
b. Unitemized (less than \$20.01 each - no Schedule)	(3b.) \$ <u>NOT APPLICABLE</u>	
c. Subtotal of "Contributions"	(3c.) \$ _____	(18.) \$ _____
4. Other Receipts (Schedule 2A-1, Column 6) <u>Interest</u>	(4.) \$ <u>2,197.00</u>	(19.) \$ <u>2,197.00</u>
5. TOTAL CONTRIBUTIONS AND OTHER RECEIPTS (Add line 3c + Line 4)	(5.) \$ <u>2,197.00</u>	(20.) \$ <u>2,197.00</u>
IN-KIND CONTRIBUTIONS		
6. In-Kind Contributions		
a. Itemized (Schedule 2-1K, Column 7)	(6a.) \$ _____	
b. Unitemized (less than \$20.01 each - no Schedule)	(6b.) \$ _____	
7. TOTAL IN-KIND CONTRIBUTIONS (Add Line 6a + Line 6b)	(7.) \$ _____	(21.) \$ _____
EXPENDITURES		
8. Expenditures		
a. Itemized Direct (Schedule 2B, Column 7)	(8a.) \$ _____	
b. Itemized Get-Out-the-Vote (Schedule 6-G, Column 6)	(8b.) \$ _____	
c. In-Kind Expenditures- Purchase of Goods or Services (Schedule 2B-2, Column 7)	(8c.) \$ <u>2,326.33</u>	
d. Unitemized (less than \$50.01 each - no Schedule)	(8d.) \$ _____	
e. Subtotal of Expenditures	(8e.) \$ <u>2,326.33</u>	(22.) \$ <u>2,326.33</u>
9. Independent Expenditures (Schedule 2B-1, Column 7)	(9.) \$ _____	(23.) \$ <u>2,326.33</u>
10. TOTAL EXPENDITURES (Add Line 8e + Line 9)	(10.) \$ _____	(24.) \$ <u>2,326.33</u>
IN-KIND EXPENDITURES		
11. In-Kind Expenditures- Endorsements, Donations or Loans of Goods or Services (Schedule 2B-2, Column 8)	(11.) \$ _____	(25.) \$ <u>2,326.33</u>
DEBTS AND OBLIGATIONS		
12. Debts and Obligations		
a. Owed by the Committee (Schedule 2E)	(12a.) \$ _____	
b. Owed to the Committee (Schedule 2E)	(12b.) \$ _____	
BALANCE STATEMENT		
13. Ending Balance of last report filed (Enter zero if no previous reports have been filed.)	(13.) \$ <u>688.41</u>	
14. Amount received during reporting period (Line 5, Total Contributions & Other Receipts - Column I)	(14.) + <u>2,197.00</u>	
15. SUBTOTAL Add lines 13 and 14	(15.) = <u>2,885.41</u>	
16. Amount expended during reporting period (Line 10, Total Expenditures - Column I)	(16.) - <u>2,326.33</u>	
17. ENDING BALANCE (Subtract line 16 from line 15)	(17.) \$ <u>559.08</u>	

NOTE: Direct contributions, in-kind contributions, loans, expenditures, and outstanding debts count against the \$1,000.00 Reporting Waiver threshold. All required schedule pages must be included with this statement. *If your ending balance is negative, please recheck your math.



MICHIGAN DEPARTMENT OF STATE
Bureau of Elections

ITEMIZED DIRECT EXPENDITURES
SCHEDULE 2B
INDEPENDENT OR POLITICAL COMMITTEE

*Amended
see letter, 8/9/12*

1. Committee I.D. Number 3854-7
2. Committee Name _____

3. Name and address of person or vendor to whom the expenditure was made	5. Candidate or Ballot Question Information	6. Date	7. Amount	8. Cumulative for Election or Election Cycle
Expenditure #1 Name: <u>(C. B. S. E. Hayes)</u> Address: <u>Holt, MI 48842</u> 4. Purpose: <u>Postage</u> Expenditure Code: _____ <input type="checkbox"/> Fund Raiser	5. _____ Name of Candidate Office Sought & District # or Jurisdiction <u>Ingham</u> County <input type="checkbox"/> Ballot Proposal <input type="checkbox"/> Check box if expenditure is payment of Debt or Obligation reported on previous statement	<u>7/15/12</u> <u>OK #252</u>	<u>288.00</u>	
Expenditure #2 Name: <u>Office Max</u> Address: <u>Edgewood Blvd. Holt, MI 48842</u> 4. Purpose: _____ Expenditure Code: _____ <input type="checkbox"/> Fund Raiser	5. _____ Name of Candidate Office Sought & District # or Jurisdiction <u>Ingham</u> County <input type="checkbox"/> Ballot Proposal <input type="checkbox"/> Check box if expenditure is payment of Debt or Obligation reported on previous statement	<u>7/15/12</u> <u>OK #251</u>	<u>38.38</u>	
Expenditure #3 Name: <u>Practical Political</u> Address: <u>Competing Inc. E. Lansing 48823</u> 4. Purpose: _____ Expenditure Code: _____ <input type="checkbox"/> Fund Raiser	5. _____ Name of Candidate Office Sought & District # or Jurisdiction <u>Ingham</u> County <input type="checkbox"/> Ballot Proposal <input type="checkbox"/> Check box if expenditure is payment of Debt or Obligation reported on previous statement	<u>7/15/12</u> <u>OK #253</u>	<u>2,000.00</u>	
Expenditure #4 Name: _____ Address: _____ 4. Purpose: _____ Expenditure Code: _____ <input type="checkbox"/> Fund Raiser	5. _____ Name of Candidate Office Sought & District # or Jurisdiction _____ County <input type="checkbox"/> Ballot Proposal <input type="checkbox"/> Check box if expenditure is payment of Debt or Obligation reported on previous statement			

Subtotal this page

Grand Total of all Schedules 2B
(Complete on last page of Schedule)

2,326.38
2,326.38
Enter this total
On Line 8a of the
Summary Page

PLEASE REFER TO INSTRUCTIONS FOR LIST OF EXPENDITURE CODES

original

EMIZED IN-KIND EXPENDITURE
SCHEDULE 2B-2
DEPENDENT OR POLITICAL COMMITTEE

1. Committee I. D. Number 38547
2. Committee Name Democratic Club of D. 141

3. Name and Address of person or committee to whom goods or services were donated or loaned, or for whom goods or services were purchased.	4. Type of Expenditure (Check applicable box) 5. Date of Expenditure 6. Name and Address of Vendor from whom goods or services were purchased.	7. Amount or Money Spent (Purchased Goods or Services)	8. Fund Source (Enter or Code of Loan or Service)	9. Cumulative for the Election or Election Cycle (Through date in Item 5)
Expenditure #1 Name: <u>Democratic Club of Ewan Hope</u> Address: <u>HOIT, MI</u> Name of Candidate _____ Office Sought & District # or Jurisdiction <u>Clerk J. J. Graham</u> County <u>_____</u> Ballot Proposal _____	4. <input type="checkbox"/> Election or guarantee of bank loan <input type="checkbox"/> Goods donated or Loaned <input type="checkbox"/> Services donated <input checked="" type="checkbox"/> Services Purchased <input type="checkbox"/> Services Purchased - LOAN Description: _____ 5. DATE OF EXPENDITURE: _____ 6. VENDOR NAME & ADDRESS: _____	\$ 38.33 (paper) Chk # 251 7/15/12 Office of Hope D. 141		
Expenditure #2 Name: <u>Democratic Club of Ewan Hope</u> Address: <u>HOIT, MI</u> Name of Candidate _____ Office Sought & District # or Jurisdiction County _____ Ballot Proposal _____	4. <input type="checkbox"/> Election or guarantee of bank loan <input type="checkbox"/> Goods donated or Loaned <input type="checkbox"/> Services donated <input checked="" type="checkbox"/> Services Purchased <input type="checkbox"/> Services Purchased - LOAN Description: _____ 5. DATE OF EXPENDITURE: _____ 6. VENDOR NAME & ADDRESS: _____	\$ 288.00 (postage) Chk # 252 7/15/12 USPS		
Expenditure #3 Name: <u>Practical Political Consulting</u> Address: <u>East Lansing, MI</u> Name of Candidate _____ Office Sought & District # or Jurisdiction County _____ Ballot Proposal _____	4. <input type="checkbox"/> Election or guarantee of bank loan <input type="checkbox"/> Goods donated or Loaned <input type="checkbox"/> Services donated <input checked="" type="checkbox"/> Services Purchased <input type="checkbox"/> Services Purchased - LOAN Description: _____ 5. DATE OF EXPENDITURE: _____ 6. VENDOR NAME & ADDRESS: _____	\$ 2005.00 *210100024 Chk # 253 7/15/12		
Page Subtotal		2,326.33		

Enter this total on line 8c of the Summary Page
Enter this total on line 1 of the Summary Page

Bourbonais, Lori (MDOS)

From: Malerman, Melissa
Sent: Monday, November 05, 2012 9:55 AM
To: Bourbonais, Lori (MDOS)
Subject: FW: Supplemental Information to 10/25/12 Complaint Against DDC

From: julie kelterborn [mailto:kelterbornj@sbcglobal.net]
Sent: Sunday, November 04, 2012 7:22 PM
To: malermanm@mich.gov
Subject: Supplemental Information to 10/25/12 Complaint Against DDC

Ms. Malerman;

I am sending the below as a supplement to the existing complaint I filed against the DDC on 10/25/12. This would seem to further support the concerns I communicated on the questionable financial reporting of this committee. Can you verify who in your office would have held direct communications with Mr. Hope on this matter? I can only speculate that this seems an odd communication for your office to have had with Mr. Hope. Thank you for your assistance,
Gary Kelterborn

From: "Kangas, Will" <wkangas@lsj.com>
Date: November 1, 2012, 5:00:18 PM EDT
To: Derek Bajema <derekbajema@gmail.com>
Subject: RE: 7 township wide mailings with undisclosed money

He said they raised the money starting in the 80's.

-----Original Message-----

From: Derek Bajema [mailto:derekbajema@gmail.com]
Sent: Thursday, November 01, 2012 4:50 PM
To: Kangas, Will
Subject: Re: 7 township wide mailings with undisclosed money

And the various SOSs over the last few decade said he could report a different amount as their balance for decades? Did he say how long they've ha this pile of money?

Sent from my iPhone

On Nov 1, 2012, at 4:28 PM, "Kangas, Will" <wkangas@lsj.com> wrote:

Ha. Could be. He said they have money built up from Bingo decades ago.

11/5/2012

-----Original Message-----

From: Derek Bajema [<mailto:derekbajema@gmail.com>]
Sent: Thursday, November 01, 2012 4:27 PM
To: Kangas, Will
Subject: Re: 7 township wide mailings with undisclosed money

OKs every year? The same SOS who's said he's being referred to the AG in the last letter, which is available online? Did she say this to him in a dream he had?!

Sent from my iPhone

On Nov 1, 2012, at 3:56 PM, "Kangas, Will" <wkangas@lsj.com> wrote:

Evan said they are from Bingo earnings, which the SOS okay's every year? Weird, but as soon as there is a violation issued by the AG or something we will be on it.

-----Original Message-----

From: Derek Bajema [<mailto:derekbajema@gmail.com>]
Sent: Thursday, November 01, 2012 3:37 PM
To: Kangas, Will
Subject: 7 township wide mailings with undisclosed money

We're now up to 7 mailings with still not one funding source identified. Easily more than \$30,000 in cost. I find it hard to believe this wouldn't be an LSJ story if the Delhi Republican Club were spending this much without disclosing source of funds, to say nothing of the complete lies contained in the mailings.



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

November 19, 2012

Gary Kelterborn
3600 Creole Way
Holt, Michigan 48842

Dear Mr. Kelterborn:

The Department of State received a response to the complaint you filed against Shirley Hurni, which concerns an alleged violation 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, 1st 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: Shirley Hurni

November 10, 2012

BUREAU OF ELECTIONS
MI DEPT OF STATE

2012 NOV 16 PM 3: 57

Ms. Lori A. Bourbonais
Michigan Department of State
Bureau of Elections
430 W. Allegan - 1st Floor
Lansing, Michigan 48918

Dear Ms. Bourbonais:

RE: 11/1/12 Letter - Campaign Finance
Report Violation 7/20/12

I am Treasurer of the Democratic Club of Delhi. This is a very small group and to my knowledge the only fundraiser(s) the Club has held was the Bingo. I am not a player of Bingo but the group felt that the record keeping would be a task I could perform and thus made me Treasurer.

Two of the members had been involved in Bingo for years. One of them had parents who ran a Bingo and he worked with them. The other one also worked a Bingo, was Treasurer and knowledgeable regarding the records. The two of them, along with my many calls (through the years) with Jane Filipiak (? Sp.) of your office until she retired assisted/monitored my reports. My problems seemed to deal mostly with the "correct form or line." There never was any question or reference to any error dealing with the money entries.

On the report that was criticized (7/20/12) I had used an incorrect form and therefore it had to be AMENDED. Long ago, the State used to furnish the forms along with the notices for each filing.

The Bingo was begun sometime in the early 80's and the last one was held on July 9, 1995. Monies from the Bingos were deposited into interest bearing CD's and every two years as contributions were made to Candidates (according to the restricted amounts) money was transferred. Also, I might add that we were under close supervision by the Lottery Commission regarding our records. Our record with them was excellent.

I'm truly sorry if our reports were inaccurate. Since they were seemingly so thoroughly checked and in all these years accepted, I was really shocked by a complaint

If there is anything further that I can help with, please let me know.

Sincerely,

Shirley Hurni
517-646-2031

Shirley Hurni
900 Hogsback Rd.
Mason, MI 48854-9570



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

February 20, 2013

Shirley Hurni
900 Hogsback Road
Mason, Michigan 48854

Dear Ms. Hurni:

The Department of State (Department) has completed its initial investigation of a complaint filed against you by Gary Kelterborn, 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. Kelterborn's complaint.

The MCFA requires the treasurer of a committee to file complete and accurate finance statements and reports. A person who files an incomplete or inaccurate statement may be subject to a civil fine of up to \$1,000.00. MCL 169.233(10).

The Act also 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.* If the Department is unable to correct or prevent additional violations, it may convene an administrative hearing or ask the Attorney General to prosecute if a crime has been committed. *Id.*

The complaint was filed by Mr. Kelterborn on October 25, 2012, and you filed a written response on November 16, 2012. Mr. Kelterborn did not file a rebuttal statement.

Mr. Kelterborn alleged that the campaign statement you filed on behalf of the Democratic Club of Delhi committee (the Committee) was inaccurate in its reporting of the Committee's cash on hand and the receipt in the amount of \$2,197.00. This receipt was reported as interest. Mr. Kelterborn provided a copy of the Committee's amended campaign finance statement filed on August 21, 2012.

In response, you stated that between the early 1980s and 1995, the Committee held bingo-related fundraisers. You further stated that the money raised at these fundraisers was then deposited in to interest-bearing certificates of deposit (CDs). You explained that when the Committee decides to contribute to individual candidates, the Committee transfers the interest necessary to cover the contributions from the CDs to the Committee's official deposit account. You indicated that this has been the practice of the Committee for many years. You also indicated that you have been in contact with the Department throughout the years and have attempted to comply with the reporting requirements of the Act.

It has been the Department's position that the Act does not preclude a transfer from a committee's official depository account to an interest bearing account if the committee retains complete control of the funds at all times. *Declaratory Ruling to John L. Damstra* (September 2, 1977).¹ However, in order to assure compliance with the reporting requirements, the Department has required that:

1. All funds transferred out of the designated official depository account to any savings account, certificate of deposit, or other interest earning account be eventually transferred back into the official account.
2. No expenditures be made from any funds transferred to an account other than the official depository account.
3. Any interest earned from an account consisting of funds belonging to the committee be timely reported on the required reports of the committee.
4. That the committee's supporting records reflect the cash balances in all accounts and all transfers of funds between these accounts.
5. The committee's required reporting reflects the cash balances in all accounts consisting of funds belonging to the committee.

Declaratory Ruling to Damstra (September 2, 1977).

After carefully reviewing all of the evidence provided by both parties and your filed campaign finance statements, it appears that while the transfers of money or interest between accounts have been properly disclosed, the balances in each account have not been properly disclosed on the Committee's statements and a violation of the MCFA has occurred.

The Act requires the Department to use informal methods correct violations or prevent further violations. MCL 169.215(10). Please provide the Department a list of all accounts or certificates of deposit which contain committee funds and each balance no later than **March 8, 2013**. After its review of the information, the Department will then determine how to proceed.

Sincerely,



Lori A. Bourbonais
Bureau of Elections
Michigan Department of State

c: Gary Kelterborn

¹ http://www.michigan.gov/documents/1977_126156_7.pdf.