

State of Michigan Ruth Johnson, Secretary of State DEPARTMENT OF STATE Lansing

May 23, 2014

Matt Maddock 1150 South Milford Road Milford, Michigan 48381

Dear Mr. Maddock:

The Department of State (Department) received a formal complaint filed by Robert LaBrant against you, alleging that you violated section 47(1) of the Michigan Campaign Finance Act (MCFA), 1976 PA 388, MCL 169.247(1), by failing to include a complete and correct identification statement certain campaign material. A copy of the complaint is provided as an enclosure with this letter.

The MCFA and corresponding administrative rules require a person who produces printed material that relates to an election to include the phrase "Paid for by [name and address of the person who paid for the item]." MCL 169.247(1), R 169.36(2). A knowing violation constitutes a misdemeanor offense punishable by a fine of up to \$1,000.00, imprisonment for up to 93 days, or both. MCL 169.247(6).

In support of his complaint, Mr. LaBrant provided a copy of campaign material which states "Matt Maddock for State Senate, 15th District" and "Please vote for Matt Maddock in the August 5th, 2014 primary [.]" It appears that there is no paid-for-by statement on the material.

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 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, 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. LaBrant, 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

BUREAU OF ELECTIONS RICHARD H. AUSTIN BUILDING • 1ST FLOOR • 430 W. ALLEGAN • LANSING, MICHIGAN 48918 www.Michigan.gov/sos • (517) 373-2540 Matt Maddock May 23, 2014 Page 2

administrative hearing, or referring this matter to the Attorney General for enforcement of the criminal penalty provided in section 47(6) 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: Robert LaBrant

Michigan Department of State Campaign Finance Complaint 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.			014
I allege that the MCFA was violated	as follows:		MAY
			5
Section 1. Complainant			
Your Name Robert LaBrant		Daytime Telephone Number 517-267-9028	ų
Mailing Address 106 W. Allegan Street, Suit	te 200		26
City Lansing	State	^{Zip} 48933	<u>.'</u>

Section 2. Alleged Violator		
Name Matt Maddock		
Mailing Address 1150 S. Milford Road		
City Milford	State MI	^{Zip} 48381

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

Section(s) of the MCFA violated: Sec. 47(1) MCL 169.247

Explain how those sections were violated:

Printed matter does not contain an identification as to the person who paid for

the printed material and their address.

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

See attached.

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.

MAY12, 2014 Х Signature of Complainant

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:

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

Revised 06/03/2011

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"We can't continue to elect Republicans that are not willing to make an unyielding commitment to conservative principals."

Matt Maddock for State Senate, 15th District Western Oakland County

Matt's Promises to Michigan Voters:

- "I will never vote to increase any tax or fee."
- "I will never vote to expand government."
- "I promise to lead initiatives in Lansing to reduce the size and scope of state government."



Who is Matt?

Matt is 48 and has been married for 20 years to his best friend Meshawn. They have three great kids, Gunther Winsome and Parker and they have lived the last 14 years in Milford. Matt is a lifelong Oakland County resident, grew up in West Bloomfield and attended Orchard Lake St. Mary's. Matt was inspired at an early age to enter the business world. He has been a small business owner (President of A-1 Bail Bonds) for the past 24 years (he has employed over 60 people and is also a Licensed Private Detective.

Matt has always been a passionate conservative. He is a Core Member of Tea Party Patriots of West Oakland County. Over the last 18 years he has been an outspoken grassroots conservative voice. He currently serves on 11th Congressional Committee and the Oakland County Republican Party Executive Committee.

The Maddock family belongs to Cornerstone Highland Church and Matt drives a church bus for the teen ministry. He is a member Oakland County Republican Party, NRA, Gun Owners of America and the National Association for Gun Rights and a past board member of Citizens for Traditional Values and the Current President of Michigan Professional Bail Agents Association. *Matt loves Michigan!* He enjoys pheasant and small game hunting, brook trout fishing, boating, water skiing, snowmobiling and snow skiing. He is also an avid backyard barn engineer!

Matt is a true conservative candidate mounting a primary challenge to a Big Government RINO Senator that has voted with Democrats. This is going to be a door-to-door, ground-game, David vs. Goliath campaign and We Need Your help!

Contact Matt:

- Email: mattandmeshawn@comcast.net
- Phone or Text: 248-866-2631
- Web Site: MattMaddock.com (online March 26th)

Donate or Volunteer:

- Please take stake in this grassroots and volunteer for Matt's campaign to help defeat a liberal establishment beltway Republican.
- Donations can also be made at web site above. Make checks payable to Comittee to Elect Matt Maddock

CORE BELIEFS & PRINCIPLES

- Problem is many elected "Republicans" do not stick to core beliefs of the party's platform including: Free enterprise, Fiscal responsibility, and the Belief that the best government is that which governs least.
- We are living in perilous times. Government growth, crushing debt and spending are the largest threats to our liberty and pursuit of happiness. Our only "out" is to immediately reduce spending, remove obstacles and make our government perform MORE EFFICIENTLY AND EFFECTIVELY on <u>less!</u>
- Put citizens first and close the door on special interest groups, big businesses, and government lobbyists. No more state-sanctioned crony capitalism!
- Less taxes, fees and regulations.
- Michigan's economy is stale. Much can be done to help restore prosperity to MI.
- We MUST make BOLD reforms to transform Michigan into an economic playground that industries will flock to and jobs will flourish.

BOLD AGENDA TO HELP MICHIGAN CITIZENS AND BUSINESSES

LESS GOVERNMENT TO STIMULATE ECONOMY AND JOBS:

- Eliminate the Michigan Business Tax to make Michigan competitive in our reigon.
- End taxpayer-funded corporate welfare subsidies to businesses (e.g. film industry, etc.)
- Divest government services that are already performed in the private sector.
- Cut red tape, consolidate, and reduce the bureaucracy in all state departments.
- No new taxes or fees for road repairs. Cut the waste to pay for roads.

REDUCE FEDERAL CONTROL OVER MICHIGAN:

- Work to repeal or eliminate Obamacare impact to Michigan residents including rolling back Medicaid expansion.
- End federal control in Michigan education system (e.g. Common Core, etc.)
- Support Article V Amendment Convention for federal term limits to eliminate career politicians and create a ballanced budget amendment.

These two men couldn't be any different!	Mike Kowall	Matt Maddock
Increases taxes and fees on Michigan businesses and citizens. Supports growth in size and scope of government.	Yes	No
Supports taxpayer subsidies and loans to select businesses (corporate welfare, crony capitalism)	Yes	No
Voted for Medicaid expansion to help root Obamacare in Michigan	Yes	No
Supports Federal Government Common Core education curriculum standards in Michigan classrooms	Yes	No
13 Year career politician. Wants to keep full-time legislature	Yes	No
Abandoned Republican Party principals and voted with the liberals	Yes	NEVER

How Matt compares to his Big Government opponent

Please vote for Matt Maddock in the August 5th, 2014 primary!



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

July 8, 2014

Robert LaBrant 106 West Allegan Street Suite 200 Lansing, Michigan 48933

Dear Mr. LaBrant:

The Department of State received a response to the complaint you filed against Matt Maddock, 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 <u>within 10 business days</u> 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,

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Lori A. Bourbonais Bureau of Elections Michigan Department of State

c: Matt Maddock

Michigan Department of State **Campaign Finance Complaint Form**

This c	complaint form	may be used	to file a	complaint	alleging	that someone	violated
the Michi	gan Campaigr	n Finance Act	(the MC	FA, 1976	PA 388, a	as amended; I	MCL
169.201	et seq.).			-			2

Please print or type all information.

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Section 1: Complainant	2010 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 10 1990 - 1990 - 1990 - 1990 - 1990 - 1990 - 1990 - 1990 - 1990 - 1990 - 1990 - 1990 - 1990 - 1990 - 1990 - 1990 - 1 1990 - 1990 - 1990 - 1990 - 1990 - 1990 - 1990 - 1990 - 1990 - 1990 - 1990 - 1990 - 1990 - 1990 - 1990 - 1990 -
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Explain how those sections were violated:

Printed matter does not contain an identification as to the person who paid for

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

See attached.		L 110
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Section 4. Certification (Required)
I certify that to the best of my knowledge, information, and belief, formed after
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TILL AD A CALL FROM MUL
x Robert S. h& Blank - Wenter MAY 12, 2014
Signature of Complainant / Date
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OOPS! SORRY! LUCKS LIKE I MADE
A MISTAKE. WILL YOU PLEASE FONGIVE ME?
ALL CAMPATON NATORIAL HAS THE PROPEN
"PAD FOR" DATA MON. WEVE NEVER DONE THIS COMPAGNED
BEFORE SU ATL THE LAWS CREATERSD AND NEW TO all
CAMPAICAL. WE THE 100% COMPOSIT MOW! THANKS FOR LETTING
CAMPAIGN. WE ING 100% COMPLANT MOW! THANKS FOR LETTING US KNOW ABOUT THS! ENCUSED MATERIA FROM CAMPAGENI WERE LEARNING AT WE GO.
A Martin Welling the for 19-19-14
Signature of Complainant Date

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Revised 06/03/2011

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Supports Federal Government Common Core education curriculum standards in Michigan classrooms	Yes	No
13 Year career politician. Wants to keep full-time legislature	Yes	No
Abandoned Republican Party principals and voted with the liberals	Yes	NEVER

How Matt compares to his Big Government opponent

Please vote for Matt Maddock in the August 5th, 2014 primary!

It's Time to Replace Himł

He's a Tax & Spend Career Politician AND He's Voting *WITH* the Democrats

AND He Doesn't Return Your Calls

fevoletion.

Medicald Expansion (Obama's Health Plan)
Hundreds of MILLIONS in Corporate Welfare
Increased Taxes, Fees & Regulations
New Tax Burdens on Our Seniors
Hundreds of Spending Increases

Senator Kowall

With Republicans like this.... who needs Democrats?

Paid for by Friends of Matt Maddock 1150 S. Milford Rd Milford, MI 48381

Vote for MADDOCK August 5th

I'm For: Roads as #1 Priority, Part-Time Legislature Repealing Obamacare, Free Market Healthcare Repeal State Income Tax, End Corporate Welfare No New Taxes or Fees, No Bailouts

"I'll make government make more SENSE while consuming less CENTS"

I Will Fight For You In Lansing...Please Help Me Get There!





FOR STATE SENATE

FOUNDING PRINCIPLES

CONSERVATIVE LEADERSHIP



State of Michigan Ruth Johnson, Secretary of State DEPARTMENT OF STATE Lansing

October 7, 2014

Matt Maddock 1150 South Milford Road Milford, Michigan 48381

Dear Mr. Maddock:

The Department of State (Department) has completed its investigation of the complaint filed against you by Robert LaBrant, which alleged that you violated section 47(1) of the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.247(1), by failing to include a complete and correct identification statement on certain campaign-related material. This letter concerns the disposition of Mr. LaBrant's complaint.

The MCFA and corresponding administrative rules require a person who produces printed material that relates to an election to include the phrase "Paid for by [name and address of the person who paid for the item]." MCL 169.247(1), R 169.36(2). A knowing violation constitutes a misdemeanor offense punishable by a fine of up to \$1,000.00, imprisonment for up to 93 days, or both. MCL 169.247(5).

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.

Mr. LaBrant filed his complaint on May 15, 2014, and you filed a written response on June 27, 2014. Mr. LaBrant did not file a rebuttal statement with the Department.

Mr. LaBrant alleged that one of your campaign flyers did not contain a complete and correct paid-for-by statement. In support of his complaint, Mr. LaBrant provided a copy of a flyer which states, "Matt Maddock for State Senate, 15th District" and "Please vote for Matt Maddock in the August 5th, 2014 primary [.]" It appears that there is no paid-for-by statement on the flyer.

In your response you indicated that the omission of a paid-for-by statement was a mistake and that "all campaign material has the proper 'paid for' data now." As evidence, you provided a campaign card which does contain a complete and correct paid-for-by statement.

While the Department believes that the evidence tends to show that your campaign material failed to contain a complete paid-for-by statement, section 15(10) of the MCFA requires the Department to "endeavor to correct the violation or prevent a further violation by using informal methods such as a conference, conciliation, or persuasion [.]" The Department is satisfied that

BUREAU OF ELECTIONS RICHARD H. AUSTIN BUILDING • 1ST FLOOR • 430 W. ALLEGAN • LANSING, MICHIGAN 48918 www.Michigan.gov/sos • (517) 373-2540 Matt Maddock October 7, 2014 Page 2

you took appropriate corrective measures once the potential violation was brought to your attention.

Additionally, the Department is advising you that section 47(1) and R 169.36(2) require you to print a complete and accurate identification statement on all campaign materials, consisting of the phrase "paid for by" followed by the full name and address of your committee. <u>Note that all printed materials that refer to an election or your candidacy produced in the future must include this identification statement</u>.

Please be advised that this notice has served to remind you of your obligation under the Act to identify your printed matter, and may be used in future proceedings as evidence that tends to establish a knowing violation of the Act. A knowing violation is a misdemeanor offense and may merit referral to the Attorney General for enforcement action. MCL 169.247(5), 215(10).

The Department now considers this matter closed and will take no further action against you at this time.

Sincerely,

Bou bonce -

Lori Bourbonais Bureau of Elections Michigan Department of State

c: Robert LaBrant