

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

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This complaint form may be used to file a complaint alleging that someone ~~violated the~~ **GREAT SEAL** Michigan Campaign Finance Act (the MCFA, 1976 PA 388, as amended; MCL 169.201 *et seq.*). All information on the form must be provided along with an original signature and evidence. Please print or type all information.

I allege that the MCFA was violated as follows:

Section 1. Complainant		
Your Name <b>Joseph DiSano</b>	Daytime Telephone Number <b>517-974-8352</b>	
Mailing Address <b>2162 Banyon Trail</b>		
City <b>East Lansing</b>	State <b>MI</b>	Zip <b>48823</b>

Section 2. Alleged Violator		
Name <b>ABDUL EL-SAYED FOR MICHIGAN</b>		
Mailing Address <b>P.O. BOX 32180</b>		
City <b>DETROIT</b>	State <b>MI</b>	Zip <b>48232</b>

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

Section(s) of the MCFA violated:

**MCL § 169.271**

Explain how those sections were violated:

**PLEASE SEE ATTACHED**

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

**PLEASE 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.*

X

  
Signature of Complainant

8/3/18  
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:*

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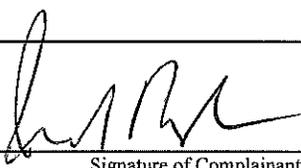
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X

  
Signature of Complainant

8/3/18  
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 with an **original signature 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

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Ruth Johnson  
Secretary of State  
c/o Michigan Department of State  
Bureau of Elections  
Richard H. Austin Building – 1st Floor  
**430 West Allegan Street**  
**Lansing, Michigan 48918**

Dear Secretary Johnson:

I write to bring your attention to several suspicious campaign contributions received by Abdul El-Sayed for Michigan, the campaign committee of gubernatorial candidate Abdul El-Sayed, and Hammoud for Michigan, an independent committee associated with Michigan Representative Abdullah Hammoud. The suspicious campaign contributions appear to be part of a scheme to undermine Michigan's contribution limits by laundering money intended for Mr. El-Sayed's campaign through Hammoud for Michigan in violation of Mich. Comp. Laws § 169.271.

On July 31, Hammoud for Michigan received several large contributions from the following out-of-state donors who had already contributed the maximum \$6,800 permitted to Abdul El-Sayed's gubernatorial campaign:

- \$50,000 from Ashwin Vasan (New York)
- \$10,000 from Aisha Jukaku (New York)
- \$10,000 from Hasan Rizvi (California)
- \$10,000 from Masarath Haque (Massachusetts)<sup>1</sup>

The next day, Hammoud for Michigan contributed \$61,200 to Abdul El-Sayed for Governor.<sup>2</sup> While these out-of-state donors had already contributed \$6,800 each to Abdul El-Sayed for Governor, they did not have a similar history of making large contributions to Hammoud for Michigan or Rep. Hammoud's campaign committee, Friends of Abdullah Hammoud. According to a search of the campaign finance database, only Ms. Jukaku had ever previously contributed to Rep. Hammoud through his campaign committee and in much smaller amounts (\$50 in 2016 and \$250 in 2018).<sup>3</sup> The other donors have no records of contributions to Friends of Hammoud or Hammoud for Michigan.

The Michigan Campaign Finance Act prohibits making a contribution to a committee with the understanding that it will be passed on to another candidate.<sup>4</sup> As the Michigan Candidate Manual explains, "A person cannot give a contribution to another person with the understanding or

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<sup>1</sup> See Hammoud for Michigan, Late Contribution Report (July 31, 2018), attached as Exhibit A; *see also* Michigan Campaign Finance Search Results attached as Exhibit B.

<sup>2</sup> Abdul El-Sayed for Governor, Late Contribution Report (Aug. 1, 2018), attached as Exhibit C.

<sup>3</sup> See Michigan Campaign Finance Search Results attached as Exhibit D.

<sup>4</sup> Mich. Comp. Laws § 169.271. The statute applies to candidates for governor in a primary. *Id.* § 169.203(e).

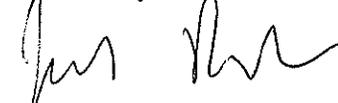
agreement that the contribution will be passed on to a particular Candidate Committee.”<sup>5</sup> Nor may a candidate committee “accept a contribution with the agreement or arrangement that the committee will transfer the contribution to a particular Candidate Committee.”<sup>6</sup>

It strains credulity to imagine that all of these donors made independent decisions to contribute tens of thousands of dollars for the first time to a Michigan state representative’s PAC coincidentally one day before the same PAC made a \$61,200 contribution to the same gubernatorial candidate these donors had already supported up to the legal limit. A person who knowingly violates § 169.271 is guilty of a misdemeanor.<sup>7</sup>

I respectfully request that you immediately investigate this apparent scheme to circumvent Michigan’s campaign contribution limits.

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

Yours truly,



Joe DiSano

Enclosures

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<sup>5</sup> Mich. Dep’t of State, *Candidate Manual*, <https://mertsplus.com/mertsuserguide/index.php?n=MANUALCAN.ContributionsAndOtherReceipts#canprohib>.

<sup>6</sup> *Id.* at Appendix O, <https://mertsplus.com/mertsuserguide/index.php?n=MANUALS.AppendixO>.

<sup>7</sup> Mich. Comp. Laws § 169.271(2).

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**Exhibit A**

LATE CONTRIBUTION REPORT

- 1. Your Committee ID# 518126
- 2. Your Committee Name HAMMOUD FOR MICHIGAN
- 3. Date of Transaction 07/31/2018  
(Only one Date per Session)

ITEMIZED CONTRIBUTIONS

CUMULATIVE Contribution #1

Contributors Last Name or Organization	First Name	Occupation	Employer
Vasan	Ashwin	Physician	Columbia University
<b>Contributors Address</b>		<b>Employer/Business Address</b>	
54 Hicks St		622 West 168th St	
<b>City</b>	<b>State</b>	<b>City</b>	<b>State</b>
Brooklyn	NY	New York	NY
<b>Zip Code</b>		<b>Zip Code</b>	<b>Cumulative Amount</b>
11201		10032	50,000.00

CUMULATIVE Contribution #2

Contributors Last Name or Organization	First Name	Occupation	Employer
Jukaku	Aisha	Finance Director	Estee Lauder Companies
<b>Contributors Address</b>		<b>Employer/Business Address</b>	
455 West 50th St Apt 2		767 5th Avenue	
<b>City</b>	<b>State</b>	<b>City</b>	<b>State</b>
New York	NY	New York	NY
<b>Zip Code</b>		<b>Zip Code</b>	<b>Cumulative Amount</b>
10019		10153	10,000.00

CUMULATIVE Contribution #3

Contributors Last Name or Organization	First Name	Occupation	Employer
Rizvi	Hasan	Retired	N/A
<b>Contributors Address</b>		<b>Employer/Business Address</b>	
55 Golden Oak Drive		N/A	
<b>City</b>	<b>State</b>	<b>City</b>	<b>State</b>
Portola Valley	CA	N/A	CA
<b>Zip Code</b>		<b>Zip Code</b>	<b>Cumulative Amount</b>
94028		00000	10,000.00

CUMULATIVE Contribution #4

Contributors Last Name or Organization	First Name	Occupation	Employer
Haque	Masarath	Retired	N/A
<b>Contributors Address</b>		<b>Employer/Business Address</b>	
69 Denny Road		N/A	
<b>City</b>	<b>State</b>	<b>City</b>	<b>State</b>
Chestnut Hill	MA	N/A	MA
<b>Zip Code</b>		<b>Zip Code</b>	<b>Cumulative Amount</b>
02467		00000	10,000.00

CUMULATIVE Contribution #5

<b>Contributors Last Name or Organization</b> Hakmeh	<b>First Name</b> Wael	<b>Occupation</b> Physician	<b>Employer</b> WMU Stryker School of Medicine
<b>Contributors Address</b> 6778 Charing Crossing		<b>Employer/Business Address</b> 125 S Kalamazoo Mall Suite 204	
<b>City</b> West Bloomfield	<b>State</b> MI	<b>City</b> Kalamazoo	<b>State</b> MI
<b>Zip Code</b> 48322		<b>Zip Code</b> 49007	<b>Cumulative Amount</b> 10,000.00

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**Exhibit B**

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# Michigan Campaign Finance Contribution Search Results

Criteria used for the search:

- Office Sought: **Governor**
- Candidate's Last Name: **"\*EL-SAYED\*"**
- Candidate's party: **Democratic Party**
- Committee Type: **Gubernatorial**
- Contributor's Last Name: **"HAKMEH"**
- Contributor's First Name: **"Wael"**

Supplemental itemizations have not been included.

Results are sorted by: **committee name** and then by: **amount-descending**

Matches 1-1 of 1

Receiving Committee Name Committee ID-Type	Schedule Type Description	Received From Address Occupation-Employer	City State Zip	Date	Amount	Cumul
<u>ABDUL EL-SAYED FOR MICHIGAN</u> 518037-GUB	DIRECT	<i>Wael HakmeH</i> 6778 CHARING XING PHYSICIAN-Wael HAKMEH	WEST BLOOMFIELD MI 48322-3001	03/13/17	\$6,800.00	\$6,800.00

Matches 1-1 of 1

[\[Campaign Finance On-Line\]](#) | [\[Expenditure Analysis\]](#) | [\[New Search\]](#)

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# Michigan Campaign Finance Contribution Search Results

Criteria used for the search:

- Office Sought: **Governor**
- Candidate's Last Name: **"\*EL-SAYED\*"**
- Candidate's party: **Democratic Party**
- Committee Type: **Gubernatorial**
- Contributor's Last Name: **"HAQUE"**
- Contributor's First Name: **"MASARATH"**

Supplemental itemizations have not been included.

Results are sorted by: **committee name** and then by: **amount-descending**

Matches 1-1 of 1

Receiving Committee Name Committee ID-Type	Schedule Type Description	Received From Address Occupation-Employer	City State Zip	Date	Amount	Cumul
<u>ABDUL EL-SAYED FOR MICHIGAN</u> 518037-GUB	DIRECT	<i>MASARATH HAQUE</i> 69 DENNY RD ATTORNEY-MASARATH HAQUE	CHESTNUT HILL MA 02467-1852	02/12/18	\$2,000.00	\$2,000.00

Matches 1-1 of 1

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# Michigan Campaign Finance Contribution Search Results

Criteria used for the search:

- Office Sought: **Governor**
- Candidate's Last Name: **"\*EL-SAYED\*"**
- Candidate's party: **Democratic Party**
- Committee Type: **Gubernatorial**
- Contributor's Last Name: **"JUKAKU"**
- Contributor's First Name: **"AISHA"**

Supplemental itemizations have not been included.

Results are sorted by: **committee name** and then by: **amount-descending**

Matches 1-1 of 1

Receiving Committee Name Committee ID-Type	Schedule Type Description	Received From Address Occupation-Employer	City State Zip	Date	Amount	Cumul
<u>ABDUL EL-SAYED FOR MICHIGAN</u> 518037-GUB	DIRECT	<i>AISHA JUKAKU</i> 455 W 50TH ST APT 2 FINANCE DIRECTOR-ESTEE LAUDER COMPANIES	NEW YORK NY 10019-6794	02/21/17	\$6,800.00	\$6,800.00

Matches 1-1 of 1

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# Michigan Campaign Finance Contribution Search Results

Criteria used for the search:

- Office Sought: **Governor**
- Candidate's Last Name: **"\*EL-SAYED\*"**
- Candidate's party: **Democratic Party**
- Committee Type: **Gubernatorial**
- Contributor's Last Name: **"RIZVI"**
- Contributor's First Name: **"HASAN"**

Supplemental itemizations have not been included.

Results are sorted by: **committee name** and then by: **amount-descending**

Matches 1-1 of 1

Receiving Committee Name Committee ID-Type	Schedule Type Description	Received From Address Occupation-Employer	City State Zip	Date	Amount	Cumul
<u>ABDUL EL-SAYED FOR MICHIGAN</u> 518037-GUB	DIRECT	<i>HASAN RIZVI</i> 55 GOLDEN OAK DR NOT EMPLOYED- HASAN RIZVI	PORTOLA VALLEY CA 94028-7909	07/16/17	\$6,800.00	\$6,800.00

Matches 1-1 of 1

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# Michigan Campaign Finance Contribution Search Results

Criteria used for the search:

- Office Sought: **Governor**
- Candidate's Last Name: **"\*EL-SAYED\*"**
- Candidate's party: **Democratic Party**
- Committee Type: **Gubernatorial**
- Contributor's Last Name: **"VASAN"**

Supplemental itemizations have not been included.

Results are sorted by: **committee name** and then by: **amount-descending**

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Matches 1-1 of 1

Receiving Committee Name Committee ID-Type	Schedule Type Description	Received From Address Occupation-Employer	City State Zip	Date	Amount	Cumul
<u>ABDUL EL-SAYED FOR</u> <u>MICHIGAN</u> 518037-GUB	DIRECT	<i>ASHWIN VASAN</i> 54 HICKS ST PROFESSOR-COLUMBIA UNIVERSITY	BROOKLYN NY 11201-1398	03/01/17	\$6,800.00	\$6,800.00

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Matches 1-1 of 1

[\[Campaign Finance On-Line\]](#) | [\[Expenditure Analysis\]](#) | [\[New Search\]](#)

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**Exhibit C**

## LATE CONTRIBUTION REPORT

1. Your Committee ID# 518037  
 2. Your Committee Name ABDUL EL-SAYED FOR MICHIGAN  
 3. Date of Transaction 08/01/2018  
 (Only one Date per Session)

## ITEMIZED CONTRIBUTIONS

## CUMULATIVE Contribution #1

Contributors Last Name or Organization	First Name	Occupation	Employer
ABIDI	SHAHAB	PHYSICIAN	SHAHAB ABIDI
<b>Contributors Address</b>		<b>Employer/Business Address</b>	
11525 FALLS RD		2 OLD LYME RD	
<b>City</b>	<b>State</b>	<b>City</b>	<b>State</b>
LUTHERVILLE TIMONIUM	MD	LUTHERVILLE	MD
<b>Zip Code</b>		<b>Zip Code</b>	<b>Cumulative Amount</b>
21093		21093	500.00

## CUMULATIVE Contribution #2

Contributors Last Name or Organization	First Name	Occupation	Employer
ADAYA	SALIM	REALTOR	IDS REAL ESTATE GROUP
<b>Contributors Address</b>		<b>Employer/Business Address</b>	
515 S FIGUEROA ST STE 1600		515 S FIGUEROA ST STE 1600	
<b>City</b>	<b>State</b>	<b>City</b>	<b>State</b>
LOS ANGELES	CA	LOS ANGELES	CA
<b>Zip Code</b>		<b>Zip Code</b>	<b>Cumulative Amount</b>
90071		90071	550.00

## CUMULATIVE Contribution #3

Contributors Last Name or Organization	First Name	Occupation	Employer
AHMED	JUNAID	CONSULTANT	JUNAID AHMED
<b>Contributors Address</b>		<b>Employer/Business Address</b>	
1155 HARMON BLVD		1155 HARMON BLVD	
<b>City</b>	<b>State</b>	<b>City</b>	<b>State</b>
HOFFMAN ESTATES	IL	HOFFMAN ESTATES	IL
<b>Zip Code</b>		<b>Zip Code</b>	<b>Cumulative Amount</b>
60169		60169	2,500.00

## CUMULATIVE Contribution #4

Contributors Last Name or Organization	First Name	Occupation	Employer
AZEEM	TAHIRA	OFFICE STAFF	DIGESTIVE DISEASES SPECIALIST
<b>Contributors Address</b>		<b>Employer/Business Address</b>	
7110 CASCADE RD SE		1200 E PARIS AVE SE	
<b>City</b>	<b>State</b>	<b>City</b>	<b>State</b>
GRAND RAPIDS	MI	GRAND RAPIDS	MI
<b>Zip Code</b>		<b>Zip Code</b>	<b>Cumulative Amount</b>
49546		49546	2,500.00

**CUMULATIVE Contribution #5**

<b>Contributors Last Name or Organization</b> BESTERVELT	<b>First Name</b> LORI	<b>Occupation</b> EVP & CTO	<b>Employer</b> NSF INTERNATIONAL
<b>Contributors Address</b> 46491 BARRINGTON RD		<b>Employer/Business Address</b> 789 N DIXBORO RD	
<b>City</b> PLYMOUTH	<b>State</b> MI	<b>City</b> ANN ARBOR	<b>State</b> MI
<b>Zip Code</b> 48170		<b>Zip Code</b> 48105	<b>Cumulative Amount</b> 1,250.00

**CUMULATIVE Contribution #6**

<b>Contributors Last Name or Organization</b> DABLIZ	<b>First Name</b> MELAKA	<b>Occupation</b> PHARMACIST	<b>Employer</b> MELAKA DABLIZ
<b>Contributors Address</b> 4635 WALNUT LAKE RD		<b>Employer/Business Address</b> 10501 TELEGRAPH RD	
<b>City</b> BLOOMFIELD HILLS	<b>State</b> MI	<b>City</b> TAYLOR	<b>State</b> MI
<b>Zip Code</b> 48301		<b>Zip Code</b> 48180	<b>Cumulative Amount</b> 500.00

**CUMULATIVE Contribution #7**

<b>Contributors Last Name or Organization</b> HAMADE	<b>First Name</b> HASSAN	<b>Occupation</b> ATTORNEY	<b>Employer</b> AT LAW GROUP PLLC
<b>Contributors Address</b> 26429 WILSON DR		<b>Employer/Business Address</b> 3 PARKLANE BLVD STE 1500	
<b>City</b> DEARBORN HEIGHTS	<b>State</b> MI	<b>City</b> DEARBORN	<b>State</b> MI
<b>Zip Code</b> 48127		<b>Zip Code</b> 48126	<b>Cumulative Amount</b> 800.00

**CUMULATIVE Contribution #8**

<b>Contributors Last Name or Organization</b> HAMILTON	<b>First Name</b> JAMES	<b>Occupation</b> RETIRED	<b>Employer</b> JAMES HAMILTON
<b>Contributors Address</b> 1906 MERSHON DR		<b>Employer/Business Address</b> 1906 MERSHON DR	
<b>City</b> ANN ARBOR	<b>State</b> MI	<b>City</b> ANN ARBOR	<b>State</b> MI
<b>Zip Code</b> 48103		<b>Zip Code</b> 48103	<b>Cumulative Amount</b> 1,500.00

**CUMULATIVE Contribution #9**

<b>Contributors Last Name or Organization</b> HAMZAVI	<b>First Name</b> FASAHAT	<b>Occupation</b> PHYSICIAN	<b>Employer</b> HAMZAVI DERMATOLOGY
<b>Contributors Address</b> 2320 DEER PATH CT		<b>Employer/Business Address</b> 2950 KEEWAHDIN RD	
<b>City</b> TROY	<b>State</b> MI	<b>City</b> FORT GRATIOT	<b>State</b> MI
<b>Zip Code</b> 48098		<b>Zip Code</b>	<b>Cumulative Amount</b>

48059

3,000.00

**CUMULATIVE Contribution #10**

Contributors Last Name or Organization	First Name	Occupation	Employer
PAQUET	KENNETH	SALESMAN	DURR SYSTEMS INC
<b>Contributors Address</b> 14715 FALLEN OAK CT		<b>Employer/Business Address</b> 40600 PLYMOUTH RD	
<b>City</b> SHELBY TWP	<b>State</b> MI	<b>City</b> PLYMOUTH	<b>State</b> MI
<b>Zip Code</b> 48315		<b>Zip Code</b> 48170	<b>Cumulative Amount</b> 900.00

**CUMULATIVE Contribution #11**

Contributors Last Name or Organization	First Name	Occupation	Employer
SALEH	EMAD	OWNER	BUENAVIDA PHARMACY
<b>Contributors Address</b> 626 YARBORO DR		<b>Employer/Business Address</b> 8040 W VERNOR HWY	
<b>City</b> BLOOMFIELD HILLS	<b>State</b> MI	<b>City</b> DETROIT	<b>State</b> MI
<b>Zip Code</b> 48304		<b>Zip Code</b> 48209	<b>Cumulative Amount</b> 6,800.00

**CUMULATIVE Contribution #12**

Contributors Last Name or Organization	First Name	Occupation	Employer
SCOTT-CRAIG	THOMAS	PHYSICAN	UNIVERSITY OF MICHIGAN
<b>Contributors Address</b> 1412 LINWOOD AVE		<b>Employer/Business Address</b> 1500 E MEDICAL CENTER DR	
<b>City</b> ANN ARBOR	<b>State</b> MI	<b>City</b> ANN ARBOR	<b>State</b> MI
<b>Zip Code</b> 48103		<b>Zip Code</b> 48109	<b>Cumulative Amount</b> 500.00

**CUMULATIVE Contribution #13**

Contributors Last Name or Organization	First Name	Occupation	Employer
SHEETS	LAWRENCE	ANALYST	IAC
<b>Contributors Address</b> 11945 CROOKED LN		<b>Employer/Business Address</b> 28333 TELEGRAPH RD,	
<b>City</b> SOUTH LYON	<b>State</b> MI	<b>City</b> SOUTHFIELD	<b>State</b> MI
<b>Zip Code</b> 48178		<b>Zip Code</b> 48034	<b>Cumulative Amount</b> 1,000.00

**CUMULATIVE Contribution #14**

Contributors Last Name or Organization	First Name	Occupation	Employer
SHEIKH	HAROON	SOFTWARE ENGINEER	APPLE
<b>Contributors Address</b> 2109 ALAQUA LAKES BLVD		<b>Employer/Business Address</b> 1 INFINITE LOOP	

<b>City</b> LONGWOOD <b>Zip Code</b> 32779	<b>State</b> FL	<b>City</b> CUPERTINO <b>Zip Code</b> 95014	<b>State</b> CA <b>Cumulative Amount</b> 500.00
<b>CUMULATIVE Contribution #15</b>			
<b>Contributors Last Name or Organization</b> SIBLINI <b>Contributors Address</b> 626 YARBORO DR <b>City</b> BLOOMFIELD HILLS <b>Zip Code</b> 48034	<b>First Name</b> OULA  <b>State</b> MI	<b>Occupation</b> SELF EMPLOYED <b>Employer/Business Address</b> 626 YARBORO DR <b>City</b> BLOOMFIELD HILLS <b>Zip Code</b> 48034	<b>Employer</b> OULA SIBLINI  <b>State</b> MI <b>Cumulative Amount</b> 3,200.00
<b>CUMULATIVE Contribution #16</b>			
<b>Contributors Last Name or Organization</b> TARABIA <b>Contributors Address</b> 139 ROCK ISLAND RD <b>City</b> QUINCY <b>Zip Code</b> 02169	<b>First Name</b> KAL  <b>State</b> MA	<b>Occupation</b> CONTRACTOR <b>Employer/Business Address</b> 139 ROCK ISLAND RD <b>City</b> QUINCY <b>Zip Code</b> 02169	<b>Employer</b> KAL TARABIA  <b>State</b> MA <b>Cumulative Amount</b> 500.00
<b>CUMULATIVE Contribution #17</b>			
<b>Contributors Last Name or Organization</b> Abbassi <b>Contributors Address</b> 435 Van Houten Ave <b>City</b> Passaic <b>Zip Code</b> 07055	<b>First Name</b> Zaed  <b>State</b> NJ	<b>Occupation</b> Executive <b>Employer/Business Address</b> 1373 Broad St <b>City</b> Clifton <b>Zip Code</b> 07013	<b>Employer</b> Practicewithease  <b>State</b> NJ <b>Cumulative Amount</b> 500.00
<b>CUMULATIVE Contribution #18</b>			
<b>Contributors Last Name or Organization</b> Abdole <b>Contributors Address</b> 8509 Vassar Rd <b>City</b> Grand Blanc <b>Zip Code</b> 48439	<b>First Name</b> Fouad  <b>State</b> MI	<b>Occupation</b> Student <b>Employer/Business Address</b> 8509 Vassar Rd <b>City</b> Grand Blanc <b>Zip Code</b> 48439	<b>Employer</b> Fouad Abdole  <b>State</b> MI <b>Cumulative Amount</b> 1,050.00
<b>CUMULATIVE Contribution #19</b>			
<b>Contributors Last Name or Organization</b> Abdullah <b>Contributors Address</b> 15646 Southwind Ave	<b>First Name</b> Faisal	<b>Occupation</b> Owner <b>Employer/Business Address</b> 15646 Southwind Ave	<b>Employer</b> Muslim Bookmark

City	State	City	State
Fontana	CA	Fontana	CA
Zip Code		Zip Code	Cumulative Amount
92336		92336	521.00

**CUMULATIVE Contribution #20**

Contributors Last Name or Organization	First Name	Occupation	Employer
Aftab	Belal	Partner	Stripe Inc
Contributors Address		Employer/Business Address	
18873 McFarland Ave		185 Berry St Ste 550	
City	State	City	State
Saratoga	CA	San Francisco	CA
Zip Code		Zip Code	Cumulative Amount
95070		94107	500.00

**CUMULATIVE Contribution #21**

Contributors Last Name or Organization	First Name	Occupation	Employer
Ahammad	Zubair	Physician	Mercy Hospital
Contributors Address		Employer/Business Address	
40 S Saint Clair St		2213 Cherry St	
City	State	City	State
Toledo	OH	Toledo	OH
Zip Code		Zip Code	Cumulative Amount
43604		43608	1,000.00

**CUMULATIVE Contribution #22**

Contributors Last Name or Organization	First Name	Occupation	Employer
Ansari	Aysha	Analyst	Google
Contributors Address		Employer/Business Address	
1477 Flicker Way		1600 Amphitheatre Pkwy	
City	State	City	State
Sunnyvale	CA	Mountain View	CA
Zip Code		Zip Code	Cumulative Amount
94087		94043	1,800.00

**CUMULATIVE Contribution #23**

Contributors Last Name or Organization	First Name	Occupation	Employer
Bazzi	Rania	Not Employed	Rania Bazzi
Contributors Address		Employer/Business Address	
145 Hampshire Ct		145 Hampshire Ct	
City	State	City	State
Dearborn	MI	Dearborn	MI
Zip Code		Zip Code	Cumulative Amount
48124		48124	5,000.00

**CUMULATIVE Contribution #24**

<b>Contributors Last Name or Organization</b> El-Gamal	<b>First Name</b> Sharif	<b>Occupation</b> Founder & CEO	<b>Employer</b> Soho Properties
<b>Contributors Address</b> 25 Wood Rd		<b>Employer/Business Address</b> 31 W 27th St	
<b>City</b> Sands Point	<b>State</b> NY	<b>City</b> New York	<b>State</b> NY
<b>Zip Code</b> 11050		<b>Zip Code</b> 10001	<b>Cumulative Amount</b> 6,800.00
<b>CUMULATIVE Contribution #25</b>			
<b>Contributors Last Name or Organization</b> El-Sayed	<b>First Name</b> Abdul	<b>Occupation</b> Candidate	<b>Employer</b> Abdul El-Sayed for Michigan
<b>Contributors Address</b> PO Box 32180		<b>Employer/Business Address</b> PO Box 32180	
<b>City</b> Detroit	<b>State</b> MI	<b>City</b> Detroit	<b>State</b> MI
<b>Zip Code</b> 48232		<b>Zip Code</b> 48232	<b>Cumulative Amount</b> 501.29
<b>CUMULATIVE Contribution #26</b>			
<b>Contributors Last Name or Organization</b> Fabrck	<b>First Name</b> Susan	<b>Occupation</b> Physician	<b>Employer</b> Hackley Community Care
<b>Contributors Address</b> 24 Circle Dr		<b>Employer/Business Address</b> 2700 Baker St	
<b>City</b> Fruitport	<b>State</b> MI	<b>City</b> Muskegon	<b>State</b> MI
<b>Zip Code</b> 49415		<b>Zip Code</b> 49444	<b>Cumulative Amount</b> 1,075.00
<b>CUMULATIVE Contribution #27</b>			
<b>Contributors Last Name or Organization</b> Gharbieh	<b>First Name</b> Subhi	<b>Occupation</b> Real Estate Broker	<b>Employer</b> Gharbieh & Associates Realtor
<b>Contributors Address</b> 2517 Woodpark Dr		<b>Employer/Business Address</b> 8070 Park Ln	
<b>City</b> Garland	<b>State</b> TX	<b>City</b> Dallas	<b>State</b> TX
<b>Zip Code</b> 75044		<b>Zip Code</b> 75231	<b>Cumulative Amount</b> 1,000.00
<b>CUMULATIVE Contribution #28</b>			
<b>Contributors Last Name or Organization</b> Girgls	<b>First Name</b> Reda	<b>Occupation</b> Physician	<b>Employer</b> Spectrum Health
<b>Contributors Address</b> 1360 Ballybunion Ct SE		<b>Employer/Business Address</b> 330 Barclay Ave NE	
<b>City</b> Grand Rapids	<b>State</b> MI	<b>City</b> Grand Rapids	<b>State</b> MI
<b>Zip Code</b> 49503		<b>Zip Code</b> 49503	<b>Cumulative Amount</b> 1,000.00

49546	<b>Zip Code</b>	<b>Cumulative Amount</b>
	49503	2,500.00

**CUMULATIVE Contribution #29**

<b>Contributors Last Name or Organization</b>	<b>First Name</b>	<b>Occupation</b>	<b>Employer</b>
Hammoud for Michigan			
<b>Contributors Address</b>		<b>Employer/Business Address</b>	
101 S Washington Sq			
Ste 620		<b>City</b>	<b>State</b>
<b>City</b>	<b>State</b>		MI
Lansing	MI	<b>Zip Code</b>	<b>Cumulative Amount</b>
<b>Zip Code</b>			61,200.00
48933			

**CUMULATIVE Contribution #30**

<b>Contributors Last Name or Organization</b>	<b>First Name</b>	<b>Occupation</b>	<b>Employer</b>
Hannan	Ahmad	Physician	Genesee Lung Associates
<b>Contributors Address</b>		<b>Employer/Business Address</b>	
8383 Warwick Groves Ct		8220 S Saginaw St	
<b>City</b>	<b>State</b>	<b>City</b>	<b>State</b>
Grand Blanc	MI	Grand Blanc	MI
<b>Zip Code</b>		<b>Zip Code</b>	<b>Cumulative Amount</b>
48439		48439	2,000.00

**CUMULATIVE Contribution #31**

<b>Contributors Last Name or Organization</b>	<b>First Name</b>	<b>Occupation</b>	<b>Employer</b>
Iqbal	Wasim	Owner	Senior Nursing Care Services
<b>Contributors Address</b>		<b>Employer/Business Address</b>	
1068 Whitewood Farms Ct NE		4066 Red Arrow Hwy	
<b>City</b>	<b>State</b>	<b>City</b>	<b>State</b>
Grand Rapids	MI	Saint Joseph	MI
<b>Zip Code</b>		<b>Zip Code</b>	<b>Cumulative Amount</b>
49525		49085	1,000.00

**CUMULATIVE Contribution #32**

<b>Contributors Last Name or Organization</b>	<b>First Name</b>	<b>Occupation</b>	<b>Employer</b>
Jukaku	Sarah	Physician	Michigan Medicine
<b>Contributors Address</b>		<b>Employer/Business Address</b>	
PO Box 32180		1415 Washington Hts	
<b>City</b>	<b>State</b>	<b>City</b>	<b>State</b>
Detroit	MI	Ann Arbor	MI
<b>Zip Code</b>		<b>Zip Code</b>	<b>Cumulative Amount</b>
48232		48109	6,700.00

**CUMULATIVE Contribution #33**

<b>Contributors Last Name or Organization</b>	<b>First Name</b>	<b>Occupation</b>	<b>Employer</b>
Mohajir	Nadiah	Director	HEART Women & Girls
<b>Contributors Address</b>			

4407 S Lake Park Ave <b>City</b> Chicago <b>Zip Code</b> 60653	<b>State</b> IL	<b>Employer/Business Address</b> 4407 S Lake Park Ave <b>City</b> Chicago <b>Zip Code</b> 60653	<b>State</b> IL <b>Cumulative Amount</b> 500.00
<b>CUMULATIVE Contribution #34</b>			
<b>Contributors Last Name or Organization</b> Najjar <b>Contributors Address</b> 940 Mill Rd <b>City</b> Madison <b>Zip Code</b> 35758	<b>First Name</b> Mamoun  <b>State</b> AL	<b>Occupation</b> President <b>Employer/Business Address</b> 105 W Dublin Dr <b>City</b> Madison <b>Zip Code</b> 35758	<b>Employer</b> Sleep & Pulmonary Care Center  <b>State</b> AL <b>Cumulative Amount</b> 500.00
<b>CUMULATIVE Contribution #35</b>			
<b>Contributors Last Name or Organization</b> Salem <b>Contributors Address</b> 1911 Beaver St <b>City</b> Dearborn <b>Zip Code</b> 48128	<b>First Name</b> Sammy  <b>State</b> MI	<b>Occupation</b> Pharmacist <b>Employer/Business Address</b> 3040 E 7 Mile Rd <b>City</b> Detroit <b>Zip Code</b> 48234	<b>Employer</b> New Mo-Town Pharmacy  <b>State</b> MI <b>Cumulative Amount</b> 2,000.00
<b>CUMULATIVE Contribution #36</b>			
<b>Contributors Last Name or Organization</b> Thabet <b>Contributors Address</b> 3850 Evaline St <b>City</b> Hamtramck <b>Zip Code</b> 48212	<b>First Name</b> Ali  <b>State</b> MI	<b>Occupation</b> Pharmacist <b>Employer/Business Address</b> 11521 Joseph Campau Ave <b>City</b> Hamtramck <b>Zip Code</b> 48212	<b>Employer</b> Infinity Drugs  <b>State</b> MI <b>Cumulative Amount</b> 500.00
<b>CUMULATIVE Contribution #37</b>			
<b>Contributors Last Name or Organization</b> Walters <b>Contributors Address</b> 270 Woodside Lake Dr Unit 3 <b>City</b> Ormond Beach <b>Zip Code</b> 32174	<b>First Name</b> Beverly  <b>State</b> FL	<b>Occupation</b> Physician <b>Employer/Business Address</b> 48 N Court St Unit 3 <b>City</b> Providence <b>Zip Code</b> 02903	<b>Employer</b> Beverly Walters  <b>State</b> RI <b>Cumulative Amount</b> 1,000.00

**CUMULATIVE Contribution #38**

<b>Contributors Last Name or Organization</b>	<b>First Name</b>	<b>Occupation</b>	<b>Employer</b>
Wilbur	Samantha	Writer	Samantha Wilbur
<b>Contributors Address</b>	<b>State</b>	<b>Employer/Business Address</b>	<b>State</b>
620 Cherry St	MI	501 S Fairview Ave	MI
<b>City</b>	<b>State</b>	<b>City</b>	<b>State</b>
Lansing	MI	Lansing	MI
<b>Zip Code</b>	<b>State</b>	<b>Zip Code</b>	<b>Cumulative Amount</b>
48933	MI	48912	527.00

**CUMULATIVE Contribution #39**

<b>Contributors Last Name or Organization</b>	<b>First Name</b>	<b>Occupation</b>	<b>Employer</b>
Zaman	Shireen	Director	Proteus Fund
<b>Contributors Address</b>	<b>State</b>	<b>Employer/Business Address</b>	<b>State</b>
6205 Nelway Dr	VA	15 Research Drive	MA
<b>City</b>	<b>State</b>	<b>City</b>	<b>State</b>
Mc Lean	VA	Ste B	MA
<b>Zip Code</b>	<b>State</b>	<b>Zip Code</b>	<b>Cumulative Amount</b>
22101	VA	01002	800.00

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2018 AUG -3 PM 4: 37  
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**Exhibit D**

[Michigan.gov Home](#) | [SOS Home](#) | [Site Map](#) | [FAQ](#) | [Online Services](#) | [Forms](#) | [Contact SOS](#)

# Michigan Campaign Finance Contribution Search Results

Criteria used for the search:

- Committee Name: **"\*HAMMOUD\*"**
- Contributor's Last Name: **"JUKAKU"**
- Contributor's First Name: **"AISHA"**

Supplemental itemizations have not been included.

Results are sorted by: **committee name** and then by: **amount-descending**

Matches 1-2 of 2

Receiving Committee Name Committee ID-Type	Schedule Type Description	Received From Address Occupation-Employer	City State Zip	Date	Amount	Cumul
<u>FRIENDS OF ABDULLAH HAMMOUD</u> 517414-CAN	DIRECT	<i>AISHA JUKAKU</i> 455 WEST 50TH STREET APT 2 DIRECTOR-ESTEE LAUDER COMPANIES	NEW YORK NY 10019-0000	07/20/18	\$250.00	\$250.00
<u>FRIENDS OF ABDULLAH HAMMOUD</u> 517414-CAN	DIRECT	<i>AISHA JUKAKU</i> 455 WEST 50TH STREET APT 2	NEW YORK NY 10019-0000	10/24/16	\$50.00	\$50.00

Matches 1-2 of 2

[\[Campaign Finance On-Line\]](#) [\[Expenditure Analysis\]](#) [\[New Search\]](#)

[Michigan.gov Home](#) | [SOS Home](#) | [Site Map](#) | [FAQ](#) | [Online Services](#) | [Forms](#) | [State Web Sites](#)  
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STATE OF MICHIGAN  
RUTH JOHNSON, SECRETARY OF STATE  
DEPARTMENT OF STATE  
LANSING

August 10, 2018

Abdul El-Sayed for Michigan  
P.O. Box 32180  
Detroit, Michigan 48232

Re: *DiSano v. Abdul El-Sayed for Michigan*  
Campaign Finance Complaint  
No. 2018-08-58-71

Dear Abdul El-Sayed for Michigan:

The Department of State (Department) received a formal complaint filed by Joseph DiSano 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.* A copy of the complaint and supporting documentation is enclosed with this letter.

The MCFA places contribution limitations per election cycle at not more than \$6,800 for candidates for governor. MCL 169.252(1)(a). Under the MCFA, a contribution is defined as “a payment, gift, subscription, assessment, expenditure, contract, payment for services, dues, advance, forbearance, loan, or donation of money or anything of ascertainable monetary value, or a transfer of anything of ascertainable monetary value to a person, made for the purpose of influencing the nomination or election of a candidate, for the qualification, passage, or defeat of a ballot question, or for the qualification of a new political party.” MCL 169.204(1). A contribution is not an independent expenditure. MCL 169.204(3)(e). A knowing violation is a misdemeanor punishable by civil fines up to \$1,000 and/or 90 days in jail. MCL 169.252(9).

Additionally, a contribution shall not be made by a person to another person with the agreement that the person receiving the contribution will transfer the contribution to a particular candidate in order to exceed the contribution limitations. MCL 169.271(1). A knowing violation is a misdemeanor punishable by civil fines up to \$1,000 and/or 90 days imprisonment. MCL 169.271(2).

Mr. DiSanto alleges that contributions were given to Hammoud for Michigan with the understanding that they would be sent to you in order to circumvent the contribution limitations established by the MCFA. Specifically, on July 31, 2018, Hammoud for Michigan received approximately \$90,000 in contributions and the next day, contributed \$61,200 to El-Sayed for Michigan.

Abdul El-Sayed for Michigan

August 10, 2018

Page 2

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. Should you elect to file a response, **please address the allegations and provide any and all evidence to support your statements.** **Please note that this may be your only opportunity to respond to the allegations in the complaint.**

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. DiSano, 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 section 54 of the Act.

Sincerely,



Adam Fracassi  
Bureau of Elections  
Michigan Department of State

c: Joseph DiSano

# ALLEN BROTHERS

ATTORNEYS AND COUNSELORS  
A PROFESSIONAL LIMITED LIABILITY COMPANY  
INTERNATIONAL CENTER  
400 MONROE • SUITE 620 • DETROIT, MI 48226  
PH: 313.962.7777 • FX: 313.962.0581  
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2018 SEP 25 AM 10:33

CLERK OF COURTS/GREAT SEAL

September 20, 2018

Via email @ [fracassia@michigan.gov](mailto:fracassia@michigan.gov)

And

United Parcel Service

State of Michigan  
Ruth Johnson, Secretary of State  
Attn: Adam Fracassi  
Bureau of Elections  
Richard Austin Bldg, 1<sup>st</sup> Floor  
430 W. Allegan  
Lansing, MI 48919

Re: DiSano v. Abdul El-Sayed for Michigan  
Campaign Finance Complaint  
No. 2018-08-58-71

Dear Mr. Fracassi:

Thank you for the opportunity to respond to the above complaint on behalf of my client, Abdul El-Sayed for Michigan. I have taken some time to examine the complaint form which alleges a violation of section 71 of the MCFA, MCL 169.271. The narrative attached to the complaint form references “suspicious campaign contributions *which appear to be* part of a scheme to undermine Michigan’s contribution limits by *laundering money* intended for Mr. El-Sayed’s campaign through Hammoud for Michigan in violation of Mich. Comp. Laws § 169.271.” (Emphasis on the inflammatory prose supplied.) This complaint, filed

three days before the August 7, 2018 primary election, goes long on headline-grabbing and short on substance.

The appropriate place to begin the analysis is obviously with the language of the statute itself which provides in pertinent part:

**§ 169.271. Prohibited contributions; violation; penalty.**

(1) A contribution shall not be made by a person to another person with the agreement or arrangement that the person receiving the contribution will then transfer that contribution to a particular candidate committee. . .

Thus, to establish a violation of this section, the complainant must, at a minimum, establish the existence of “an agreement or arrangement”. The statute is silent regarding between whom the “agreement or arrangement” must be, the candidate, the contributor, or some other third party. But that omission is of absolutely no moment because the complaint provides nothing, save rank speculation, from which the Bureau could reasonably infer that Hammoud for Michigan, the recipient of the contributions in question, agreed with *anybody* to do *anything* with them. There’s no e-mail, no phone conversation, sworn or unsworn declaration of any individual—not one scrap of tangible evidence from which one could conclude under any recognizable legal standard that anyone violated section 71 of the MCFA.

The complaint uses blind inference based upon the author’s “strained credulity” to draw a conclusion that doesn’t square with facts available to the complainant and that the complainant, for motives that the Bureau may more easily infer, deliberately chose to ignore. To begin with, the available campaign finance records clearly indicate that, well in advance of the time of the \$61,200 contribution in question, Hammoud for Michigan had a significant percentage of those funds already raised. Beyond that, the four contributions the complaint alleges were improper totaled nearly \$20,000 more than the money the PAC contributed.<sup>1</sup> This is not the sort of happenstance by which even an inference of any “agreement or arrangement” can be made. To conclude otherwise is to believe that campaign contributors cannot simultaneously believe in and support two

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<sup>1</sup> A fifth contribution of the same date to which the complaint does not object pushes that number to nearly \$30,000 of excess contributions raised.

political causes at once, even if their visions align. Now that is a conclusion that “strains credulity”.

In sum, Abdul El-Sayed for Michigan categorically denies any violation of MCL 169.271. The mere fact that Hammoud for Michigan and Abdul El-Sayed for Michigan had four common contributors proves nothing other than that they enjoyed support from some of the same people. It should surprise no one, therefore, that some of the same people jointly support committees possessing shared values, a shared vision for Michigan, and being led by figures of a similar age and background. That’s not a violation of the MCFA. To the contrary, it is conduct wholly consistent with and protected by the First Amendment of the United States Constitution. It should not be punished on the “strength” of a baseless complaint filled with misguided inuendo, incendiary rhetoric, and good copy for those in search of a story to write on the eve of an election.

Very truly yours,

A handwritten signature in black ink, appearing to read "James P. Allen, Sr.", with a large, stylized flourish extending to the left.

James P. Allen, Sr.



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

September 25, 2018

Joseph DiSano  
2162 Banyon Trail  
East Lansing, Michigan 48823

Dear Mr. DiSano:

The Department of State received a response to the complaint you filed against Abdul El-Sayed for Michigan, 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, 1<sup>st</sup> Floor, 430 West Allegan Street, Lansing, Michigan 48918.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam Fracassi".

Adam Fracassi  
Bureau of Elections  
Michigan Department of State

c: Abdul El-Sayed For Michigan

**Fracassi, Adam (MDOS)**

---

**From:** Fracassi, Adam (MDOS)  
**Sent:** Friday, August 24, 2018 3:17 PM  
**To:** 'James Allen'  
**Subject:** RE: Abdul for Michigan Response

Mr. Allen,

The Department acknowledges your request for an extension of time to file an answer to the campaign finance complaint filed by Joseph DiSano against Abdul El-Sayed for Michigan. The Department understands that additional time is needed due to a death in your family, and apologizes for your loss. The Department therefore finds there is good cause to grant a 15-business day extension pursuant to MCL 169.215(5). Please note that the original due date was August 31, 2018. The new deadline is September 24, 2018.

If you have any further questions, please do not hesitate to contact me.

Thank you,

Adam Fracassi  
Election Law Specialist  
Bureau of Elections  
Michigan Department of State  
430 West Allegan Street  
Lansing, Michigan 48918  
(517) 373-2540

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

**From:** James Allen <JamesAllen@allenbrotherspllc.com>  
**Sent:** Friday, August 24, 2018 3:05 PM  
**To:** Fracassi, Adam (MDOS) <FracassiA@michigan.gov>  
**Subject:** Abdul for Michigan Response

Dear Mr. Fracassi

Thank you for taking my call to entertain my request for an extension to file the response due to Mr. Desano's campaign finance complaint filed against my client, Abdul for Michigan. As indicated, there was a death in my family and I have to attend the wake shortly. In making the arrangements, these past couple of days I have been unable to secure documents and other information necessary to meet the deadline.

Thank you for the consideration.

James Allen

Sent from my iPhone



STATE OF MICHIGAN  
JOCELYN BENSON, SECRETARY OF STATE  
DEPARTMENT OF STATE  
LANSING

January 29, 2019

Joseph DiSano  
2162 Banyon Trail  
East Lansing, Michigan 48823

Re: *DiSano v. Abdul El-Sayed for Michigan*  
Campaign Finance Complaint  
No. 2018-08-58-71

Dear Mr. DiSano:

The Department of State (Department) has concluded its investigation into your formal complaint filed against Abdul El-Sayed For Michigan which alleged violations of the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.201 *et seq.* This letter concerns the disposition of your complaint.

Your complaint was filed on August 3, 2018 and alleged that contributions were given to Hammoud for Michigan with the understanding that they would be sent to the Abdul El-Sayed for Michigan Committee in order to circumvent the contribution limitations established by the MCFA.

By letter dated September 20, 2018, James Allen, Sr., counsel for Abdul El-Sayed for Michigan, denied the allegations in the complaint. Specifically, the respondent indicated there was a lack of evidence demonstrating an agreement or arrangement that contributions would be given to Hammoud for Michigan to later be funneled to Abdul El-Sayed for the purpose of skirting the contribution limits. No rebuttal statement was filed.

The MCFA places contribution limitations per election cycle at not more than \$6,800 for candidates for governor. MCL 169.252(1)(a). Under the MCFA, a contribution is defined as “a payment, gift, subscription, assessment, expenditure, contract, payment for services, dues, advance, forbearance, loan, or donation of money or anything of ascertainable monetary value, or a transfer of anything of ascertainable monetary value to a person, made for the purpose of influencing the nomination or election of a candidate, for the qualification, passage, or defeat of a ballot question, or for the qualification of a new political party.” MCL 169.204(1). A contribution is not an independent expenditure. MCL 169.204(3)(e). A knowing violation is a misdemeanor punishable by civil fines up to \$1,000 and/or 90 days in jail. MCL 169.252(9).

Additionally, a contribution shall not be made by a person to another person with the agreement that the person receiving the contribution will transfer the contribution to a particular candidate in order to exceed the contribution limitations. MCL 169.271(1). A knowing violation is a

misdemeanor punishable by civil fines up to \$1,000 and/or 90 days imprisonment. MCL 169.271(2).

The Department has reviewed the documents submitted by the parties and the relevant campaign finance reports filed by Abdul El-Sayed for Michigan and Hammoud for Michigan. Based upon that review, the Department concludes that there is insufficient evidence to establish that a potential violation of the MCFA has occurred. According to late contribution reports filed with the Department on August 1, 2018, on July 31, 2018, Hammoud for Michigan received a total of \$90,000:

1. Ashwin Vasan (NY):	\$50,000
2. Aisha Jukaku (NY):	\$10,000
3. Hasan Rizvi (CA):	\$10,000
4. Masarath Haque (MA):	\$10,000
5. Wael Hakmeh (MI):	<u>\$10,000</u>
Total:	\$90,000

These same individuals also donated directly to Abdul El-Sayed for Michigan. With the exception of Masarath Haque, all contributed the maximum amount allowable under the Act (\$6,800).

Then, on August 1, 2018, Hammoud for Michigan contributed a total of \$61,200 to Abdul El-Sayed for Michigan.<sup>1</sup> According to its July quarterly statement filed on July 25, 2018, Hammoud for Michigan had a beginning balance of \$1,499.47 and an ending balance of \$34,476.32.

Neither the reports nor the materials submitted with the complaint provide any evidentiary support for the allegation that an agreement was made for the purpose of skirting the contribution limits. The timing of the contributions does not in-and-of itself demonstrate an agreement to avoid the contribution limits, and of particular importance is the fact that more money was contributed to Hammoud for Michigan than was contributed to Abdul El-Sayed for Michigan.

Accordingly, the Department concludes that there is insufficient evidence to support the conclusion that a violation of the Act has occurred. Therefore, the complaint is dismissed, and no further enforcement action will be taken.

Sincerely,



Adam Fracassi  
Bureau of Elections  
Michigan Department of State

c: James Allen, Sr., counsel Abdul El-Sayed for Michigan, via Email

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<sup>1</sup> Hammoud for Michigan previously made a contribution of \$6,800 on July 6, 2018.

## **Fracassi, Adam (MDOS)**

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**From:** Fracassi, Adam (MDOS)  
**Sent:** Tuesday, January 29, 2019 9:49 AM  
**To:** 'James Allen'  
**Subject:** RE: Abdul for Michigan  
**Attachments:** Dismissal.pdf

Mr. Allen,

Please find attached correspondence in regards to the campaign finance complaint filed against Abdul for Michigan by Joseph DiSano. If you have any questions, please do not hesitate to contact me.

Thank you,

**Adam Fracassi**  
Election Law Specialist  
Bureau of Elections  
Michigan Department of State  
430 West Allegan Street  
Lansing, Michigan 48918  
(517) 373-2540

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**From:** James Allen <JamesAllen@allenbrotherspllc.com>  
**Sent:** Tuesday, October 30, 2018 11:19 AM  
**To:** Fracassi, Adam (MDOS) <FracassiA@michigan.gov>  
**Subject:** RE: Abdul for Michigan

Thanks Adam. I appreciate the update and the manner in which you have conducted this on behalf of the department. Regardless of the outcome, I am always impressed with the way you and your colleagues handle some very difficult issues. If I can be of further assistance to you or do some follow up, you know where to find me.

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**From:** Fracassi, Adam (MDOS) <FracassiA@michigan.gov>  
**Sent:** Tuesday, October 30, 2018 11:04 AM  
**To:** James Allen <JamesAllen@allenbrotherspllc.com>  
**Subject:** RE: Abdul for Michigan

Good morning Mr. Allen:

The complainant elected not to file a rebuttal, but the investigation remains ongoing. Under MCL 169.215, the Department has 45 business days to make a determination after the date the rebuttal was due.

The investigation remains ongoing and a determination will be made according to the timeline established in section 15. If you have any questions, please let me know.

Thanks,

**Adam Fracassi**  
Election Law Specialist  
Bureau of Elections  
Michigan Department of State  
430 West Allegan Street  
Lansing, Michigan 48918  
(517) 373-2540

**From:** James Allen <[JamesAllen@allenbrotherspllc.com](mailto:JamesAllen@allenbrotherspllc.com)>  
**Sent:** Tuesday, October 30, 2018 10:37 AM  
**To:** Fracassi, Adam (MDOS) <[FracassiA@michigan.gov](mailto:FracassiA@michigan.gov)>  
**Subject:** Abdul for Michigan

Adam:

Good morning. I wanted to update my client on the status of this matter. I assume, since I have not heard from you, that the complainant has not timely responded and that I can close my file.

In any event, I'd appreciate some feedback about where things stand.

Best—  
Jim Allen  
313-962-7777 office  
313-779-0053 cell