

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

RECEIVED/FILED  
MICHIGAN DEPT OF STATE  
2016 MAY 25 PM 3:08

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.*). **All information on the form must be provided along with an original signature and evidence. Please print or type all information.**

ELECTIONS/GREAT SEAL

I allege that the MCFA was violated as follows:

Section 1. Complainant		
Your Name Leon Drolet	Daytime Telephone Number 586-321-5933	
Mailing Address 46116 Lookout Drive		
City Macomb Township	State MI	Zip 48044

Section 2. Alleged Violator		
Name Gust Ghanam		
Mailing Address 32068 Margaret		
City Warren	State MI	Zip 48093

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

Section(s) of the MCFA violated:  
Section 57 of the Michigan Campaign Finance Act, MCL 169.257; and Section 54 of the Act MCL 169.254; and Section 26 of the Act MCL 169.226(d)  
Explain how those sections were violated:

See attached.

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

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**Section 4. Certification (Required)**

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MAY 25 2016 PM 3:08  
ELECTIONS/GREAT SEAL

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

X

John Doe  
Signature of Complainant

5-23-2016  
Date

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

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

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

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

X

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

\_\_\_\_\_  
Date

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

Mail or deliver the completed complaint form 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

## **Section 3**

Gust Ghanam is the Treasurer of Macomb Businesses United PAC (Committee ID # 514906) and he is also a full-time employee of the city of Warren and an appointee of Mayor James R. Fouts. Ghanam, along with the Mayor and other city officials, unlawfully used significant taxpayer resources to promote and staff a fund raising event for this PAC. This article from the *Macomb Daily* newspaper dated April 9, 2016 that describes the fundraiser in detail:

<http://www.macombdaily.com/article/MD/20160409/NEWS/160409634>.

The nonprofit campaign finance watchdog Michigan Campaign Finance Network has also investigated and issued their report here:

<http://mcfn.org/press.php?prId=270>.

The evidence is overwhelming: high-ranking Warren city officials, at the direction of the Mayor, used substantial public resources to plan, staff, furnish, and promote a Political Action Committee fundraiser.

The PAC sponsored the Mayor's annual "State of the City" speech and it was a fund raising event. The fundraiser took place on April 7, 2016. On April 24, 2016, Ghanam filed the April Quarterly Campaign Statement for the committee and it showed that \$20,510 was raised on April 7, 2016. On April 10, 2016, the committee paid \$8,652 for banquet hall services to Andiamo Banquet Center in Warren.

Section 57 of the Act states it is unlawful for "a public body or individual acting on its behalf to use or authorize the use of funds, personnel, office space, computer hardware or software, property, stationery, postage, vehicles, equipment, supplies, or other public resources to make a contribution or expenditure or provide volunteer personal services[.]" As described in detail below, the fund raising event used a vast amount of City of Warren resources, personnel, and equipment in violation of Section 57 of the Act. The proof is overwhelming, and the amount of taxpayer resources used or leveraged to support the fundraiser is staggering.

Section 7 of the Act says a "Fund raising event" is defined as "an event such as a dinner, reception, testimonial, rally, auction, or similar affair through which contributions are solicited or received by purchase of a ticket, payment of an attendance fee, making a donation, or purchase of goods or services." There were 472 persons in attendance at this event and

attendees purchased tickets priced at \$40 or \$50 for seats closer to the podium. Attendees were paying to see the Mayor give an official city address and eat lunch. Even though the PAC showed \$20,510 in contributions and paid \$8,652 to the banquet hall, the PAC neglected to report this as a fund raising event under Section 26 of the Act. This violation pales in comparison to the abuse of significant taxpayer resources that were used to promote and staff this PAC fundraiser. The Mayor's "State of the City Address" is like the President's State of the Union Address, or the Governor's State of the State address. The purpose of the address is to update the public on significant events and proposals in city government. The event was staffed and attended by city employees, including uniformed law enforcement, during normal working hours. Numerous city employees also contributed to the PAC in order to attend the event during the workday.

The City of Warren promoted ticket sales to this PAC fundraiser using an insert in the March 2016 water bills. The Macomb Daily on May 5, 2016 reported this, but incorrectly identified the insert as a phone bill insert rather than a water bill insert. Here is a link to the news article:

<http://www.macombdaily.com/article/MD/20160505/NEWS/160509750>.

Attached is a copy (**Exhibit A**) of the full water bill insert and in the upper right-hand corner of the insert is an advertisement for the State of the City Speech directing water customers to call the Mayor's office at 574-4520 to purchase a \$40 ticket to the event. The city website has the most recent Water & Sewer budget information and there are 50,472 water meters in the city, and presumably over 50,000 water bills are mailed to water consumers. Here is the link to the water budget information, page 14 of the PDF has the water meter data:

<http://www.cityofwarren.org/images/stories/water-sewer-system/2015%20Adopted%20W&S%20Budget.pdf>

The event program (**Exhibit B**), which was distributed to attendees, includes BOTH the city logo and the PAC logo, along with a photo of the Mayor. The program includes a "Special Thank You to Today's Sponsors!" and it recognizes sponsors based on their level of contribution to the PAC for the fund raising event. Among the sponsors that made large PAC donations are city vendors, city employees, and city labor unions. The April Quarterly Report filed by the PAC shows that a number of the sponsors and contributors are corporate entities, and are donations may have been accepted in violation of Section 54 of the Act.

The city's government channel, known as "TV Warren", was used to staff the

fundraiser. The production of the speech included a Power Point presentation showing the Mayor's accomplishments and the accomplishments of the various city departments and employees. The presentation and speech were lengthy (1 hour, 16 minutes) and potentially hundreds of staff hours, or more, went into the preparation and production of the event. TV Warren is funded by the city's Communications Department and these are all public funds. The city-owned TV cameras were in the banquet hall during the fundraiser, and at least 3-4 cameras were used. City employees staffed these cameras during the fundraiser. The city-owned TV cameras zoomed in on various city employees during the speech as the Mayor highlighted their work for the city. The presentation used numerous video clips to support the Mayor's remarks, and as shown below the city's Communications Director directed city staff to obtain these videos and even used on-duty police officers and vehicles.

The fundraiser speech was uploaded to the City of Warren website at [www.cityofwarren.org](http://www.cityofwarren.org). The speech is uploaded on the website Vimeo at <https://vimeo.com/162073646>. The city of Warren owns the account on Vimeo at <https://vimeo.com/tvwarren>. The speech uses the official city logo and the link below the video says "2016 City of Warren State of the City Address from TV Warren on Vimeo." Attached is a "TV Warren Government Channel Program Schedule" (**Exhibit C**), and it shows the "State of the City" fundraiser speech was shown nine times per day from April 8, 2016 through April 14, 2016. The PAC did not reimburse the city for any of the equipment, employee work hours, or airtime.

Also attached is "**Exhibit D**" which is an 8-page PDF of emails obtained by the Michigan Campaign Finance Network after a Freedom of Information Act (FOIA) request. The emails from city officials show the extent to which city employees worked on taxpayer time to promote and prepare for this PAC fundraiser. Page 1 is a heavily redacted email but it shows the official Mayor's office email directing a citizen to contact Gust Ghanam to purchase a ticket to the fundraiser. Page 2 shows emails involving the city's Communications Director Tracey Perry and the Police Commissioner Jere Green and police officer Dan Beck. They are discussing getting footage of police cars for the presentation at the fundraiser, and also doing a "ride along" in a police car to get video footage. Interestingly, police officer Dan Beck writes that he needs to get the Mayor's approval before doing anything- this shows that the Mayor had to approve much of what happened and he has a high degree of culpability due to his power over all of these employees. They were using on-duty police officers and police vehicles for several hours to create videos for a political fundraiser at the expense of public safety!

Page 3 of Exhibit D shows an email between George Mikla, a city of Warren employee and production specialist, and several other city employees and other individuals whose names were redacted. This email shows that they created a "State of the City" production book, which is an attachment to the email and that everyone was to report to the banquet hall at 8:30 am on the date of the event. This further demonstrates the amount of city staff time and hours that went into the production of the PAC fundraiser.

Page 4 of Exhibit D shows multiple emails between Tracey Perry, Communications Director, and Tom Bommarito, who is an "Administrative Supervisor" for the City of Warren according to his LinkedIn profile: <https://www.linkedin.com/in/thomas-bommarito-5474b418>. He also has a private sponsorship business. According to the emails, Ms. Perry didn't have the time to work on other things such as the "Sinatra event" and "the Mayor's billboard art" because she has been "really buried with the State of the City." This is definite proof that a city department head was working long hours at taxpayer expense on the production of this event.

Pages 5 through 8 of Exhibit D involve Director Tracey Perry and eight other city of Warren employees. The emails show a list of 13 different videos or footage that she needs from the staff for the State of the City speech. In a March 7, 2016 email she says "EVERYONE IS EXPECTED TO PARTICIPATE" (all caps in original). The employees do not have a choice when the supervisor is mandating they participate in a political fundraising event. She is requesting that video footage be obtained and saved in a folder for use at the event.

This kind of blatant abuse of taxpayer dollars to support a PAC is without precedent. The City and its Mayor, working through high-ranking appointed officials, completely blurred the distinction between a PAC fundraiser and an official city function to the point that it is impossible to distinguish between the two. They used paid staff time, city mailings, city phones, the city logo and city equipment to promote and staff a PAC fundraiser during regular city work hours. The cost to the taxpayers is staggering. The PAC can now use those funds to support whatever candidate or ballot proposal it wants and the taxpayers paid the cost. This is the very thing the Act was designed to prevent and punish, and I request a referral to the Attorney General for appropriate criminal and civil penalties, in addition to administrative remedies available to the Secretary of State.

# EXHIBIT A

## **JOBS! JOBS! JOBS!**

### **Prospective Employers Needed**

The April 19 Job Fair, co-sponsored by Macomb Community College and the City of Warren, is in need of employers that want to interview prospective employees.

Interested employers should go to [www.macomb.edu](http://www.macomb.edu). (use search words "Career Services Job Fair") or call 586-445-7321.

The Job Fair will be held at South Campus, Sports and Expo Center, P-Building from 4-7 p.m.

## **Job Fair - April 19**

Location: Macomb Community College (South Campus) Sports and Expo Center, P Building on Tuesday, April 19, 4-7 p.m.

Full and part-time positions, list of employers at [www.macomb.edu](http://www.macomb.edu) "Career Services Job Fair" Sponsored by MGC and City of Warren.

## **Free Income Tax Help for Seniors** **Mondays and Wednesdays**

### **Also for the low and moderate income**

Tax-Aide helps low and moderate income taxpayers, with special attention to those 60 and older, file their personal income tax returns. Volunteers are trained to assist in filing tax forms and basic schedules, including the 1040, 1049A and 1040EZ. Taxpayers with complex tax returns are advised to seek paid tax assistance. No appointments are necessary. Held at Warren City Hall 9 a.m. - 12 p.m.

Monday, March 21	Monday, April 4
Wednesday, March 23	Wednesday, April 6
Monday, March 28	Monday, April 11
Wednesday, March 30	Wednesday, April 13

## **Burnt Out Warren Streetlights?**

Call City of Warren's 7-day - 24-hour hotline  
(586) 574-4662

## **Convention and Coin Show**

April 8 - 10

Macomb Community College Sports and Expo Center  
(South campus) 14500 E. 12 Mile (Building P)  
Hours: Friday and Saturday - 10 a.m. - 6 p.m.  
Sunday - 10 a.m. to 3 p.m.

### **Additional FREE Events**

- Professional Appraisals (Sat. 11 a.m.-3 p.m.)
- Educational Exhibits
- Educational Seminars
- Kids' Programs (Sat. 11:30 a.m.)
- Admission and Parking

[www.michigancoinclub.org](http://www.michigancoinclub.org)

For more information contact: [secretarymsns@aol.com](mailto:secretarymsns@aol.com) or  
Call (734) 453-0504

Featuring  
175 Dealer  
Tables

## **MAYOR'S STATE OF THE CITY ADDRESS**

Thursday, April 7 - Time: Noon  
Location: Andiamo Restaurant,  
Luncheon Served  
Cost: \$40 a ticket

For more information,  
call the Mayor's Office - 586-574-4520

## **Warren Senior Housing Available**

Warren Senior Housing is now accepting applications for both Sitwell Manor and Joseph Coach Manor

For more information, call 586-758-1310

**NOW OPEN**



## **It's all about good taste.**

Located in Tech Plaza Shopping Center  
(12 Mile and Van Dyke)

## **A Community Good Friday Service**

At the Warren Community Center Auditorium  
5460 Arden Avenue  
(north of 13 Mile, west of Mound)  
Friday, March 25 - 7 p.m. - 8:30 p.m.  
For more information: (586) 751-4669

## **TV Warren Special**

The story of Sgt. Philip Maceri's life, including his fight on the front line during the Battle of the Bulge, is told in the TV Warren documentary "A Hero's Journey." The program is on TV Warren at the following times during March and April.

**Fridays, Sundays, Tuesdays, and  
Thursdays 11:30 a.m. and 11 p.m.**

**Saturdays, Mondays and  
Wednesdays 8:30 a.m. and 6:30 p.m.**  
TV Warren Government Channel, Comcast  
Xfinity channel 5, WOW channel 10, ATT  
UVerse channel 99

## **FREE Diabetes Prevention Program**

Do you want to lose weight?  
Are you worried about type 2  
diabetes? Class meets once a  
week for 16 weeks with a  
trained lifestyle coach from the  
Macomb County Health  
Department.

Classes are at the Warren  
Community Center starting  
April 6 from 10 a.m. - 11 a.m.

Sign up today and make a  
change for life!

Contact: Ashley Mascagni at  
586-412-6393

## **City-Owned Vacant Lots for Sale for \$1**

If you live next door to a city-owned vacant lot, you have the option to purchase it for \$1.

Please contact Tom Bommarito (586) 574-4646 or e-mail: [tbommarito@cityofwarren.org](mailto:tbommarito@cityofwarren.org)

**EXHIBIT B**



*Presents*



**The Honorable Mayor James R. Fouts**



**Special Thank You to Today's Sponsors!**

*Event Sponsors*

**DEPENDABLE WHOLESALE  
GARAN LUCOW MILLER, P.C.  
HOWARD L. SHIFFMAN, P.C.  
METRO SANITATION & EXPRESS SERVICES  
MICHAEL SERVITTO FOR CIRCUIT COURT JUDGE  
ST. JOHN'S HOSPITAL  
TERRA CAPITAL MANAGEMENT**

*Platinum Sponsors*

**AEW  
AFSCME LOCAL 1250  
AXE & ECKLUND, P.C.  
BELL COMPANY  
BERRY MOORMAN, P.C.  
FTC&H  
HUBBELL ROTH & CLARK, INC.  
JOE ORAM  
JOSEPH LENTINI  
KIRK, HUTH, LANGE & BADALAMENTI  
LEADERSHIP CONSULTANTS, INC.  
MAYOR JAMES R. FOUTS  
NTH CONSULTANTS, INC.  
GREG PALICZUK  
PLANNING COMMISSION  
RONCELLI, INC.  
TETRATECH, INC.  
TMR  
WARREN BUILDING DEPARTMENT  
WARREN FIRE DEPARTMENT COMMAND  
WARREN POLICE DEPARTMENT COMMAND  
WARREN POLICE OFFICERS ASSOCIATION  
WARREN PROFESSIONAL FIRE FIGHTERS, IAFF LOCAL 138  
WEIGAND MACK SALES & SERVICE, INC.  
ZUNIGA CEMENT CONSTRUCTION, INC.**

*Gold Sponsors*

<b>5-STAR</b>	<b>M2K MANAGEMENT</b>
<b>BRANCH TREE SERVICE</b>	<b>MARKS' ONE COLLISION</b>
<b>BRICKLAYERS LOCAL 2</b>	<b>OWEN TREE SERVICE</b>
<b>COMP ONE</b>	<b>SHANGO ASSOCIATES</b>
<b>INTERNATIONAL OUTDOOR</b>	<b>SPONSORSHIP SOLUTIONS</b>

## ***Program***

**Invocation**

**Lunch**

**Announcements**

**Introduction of the Mayor: U.S. Congressman Sander Levin**

**Mayor Fouts' State of the City Address**

# EXHIBIT C



## TV Warren Government Channel Program Schedule Comcast Xfinity Channel 5, WOW Channel 10, ATT U-Verse Channel 99

City of Warren Communications Department, 5460 Arden Warren MI 48092, 586-258-2000, www.cityofwarren.org

	Friday 4/8/16	Saturday 4/9/16	Sunday 4/10/16	Monday 4/11/16	Tuesday 4/12/16	Wednesday 4/13/16	Thursday 4/14/16	
7:00 a.m.	Life is Good	State of the City	Life is Good	State of the City	Life is Good	State of the City	Life is Good	07:00
7:30 a.m.	A Hero's Journey	State of the City	A Hero's Journey	State of the City	A Hero's Journey	State of the City	A Hero's Journey	07:30
8:00 a.m.	Veterans Project	State of the City	Veterans Project	State of the City	Veterans Project	State of the City	Veterans Project	08:00
8:30 a.m.	Veterans Project	A Hero's Journey	Veterans Project	A Hero's Journey	Veterans Project	A Hero's Journey	Veterans Project	08:30
9:00 a.m.	TV Warren News	TV Warren News	TV Warren News	09:00				
9:30 a.m.	Gong Green	Life is Good	Gong Green	Life is Good	Gong Green	Life is Good	Gong Green	09:30
10:00 a.m.	People, Parks	Gong Green	People, Parks	Gong Green	People, Parks	City Council (replay)	People, Parks	10:00
10:30 a.m.	(BULLETIN BOARD)	City Council (replay)	(BULLETIN BOARD)	10:30				
11:00 a.m.	Life is Good	People, Parks	Life is Good	People, Parks	Life is Good	City Council (replay)	Life is Good	11:00
11:30 a.m.	A Hero's Journey	(BULLETIN BOARD)	A Hero's Journey	(BULLETIN BOARD)	A Hero's Journey	City Council (replay)	A Hero's Journey	11:30
12:00 p.m.	TV Warren News	City Council (replay)	TV Warren News	12:00				
12:30 p.m.	State of the City	A Hero's Journey	Gong Green	A Hero's Journey	State of the City	City Council (replay)	State of the City	12:30
1:00 p.m.	State of the City	Planning	Planning	Life is Good	State of the City	Life is Good	State of the City	13:00
1:30 p.m.	State of the City	Gong Green	State of the City	Gong Green	State of the City	Gong Green	State of the City	13:30
2:00 p.m.	Gong Green	People, Parks	State of the City	People, Parks	Gong Green	People, Parks	Gong Green	14:00
2:30 p.m.	People, Parks	State of the City	State of the City	State of the City	People, Parks	State of the City	People, Parks	14:30
3:00 p.m.	Veterans Project	State of the City	Veterans Project	State of the City	Veterans Project	State of the City	Veterans Project	15:00
3:30 p.m.	Veterans Project	State of the City	Veterans Project	State of the City	Veterans Project	State of the City	Veterans Project	15:30
4:00 p.m.	TV Warren News	TV Warren News	TV Warren News	16:00				
4:30 p.m.	(BULLETIN BOARD)	(BULLETIN BOARD)	(BULLETIN BOARD)	16:30				
5:00 p.m.	State of the City	Veterans Project	State of the City	Veterans Project	State of the City	Veterans Project	State of the City	17:00
5:30 p.m.	State of the City	Veterans Project	State of the City	Veterans Project	State of the City	Veterans Project	State of the City	17:30
6:00 p.m.	State of the City	(BULLETIN BOARD)	State of the City	(BULLETIN BOARD)	State of the City	(BULLETIN BOARD)	State of the City	18:00
6:30 p.m.	(BULLETIN BOARD)	A Hero's Journey	(BULLETIN BOARD)	A Hero's Journey	(BULLETIN BOARD)	A Hero's Journey	(BULLETIN BOARD)	18:30
7:00 p.m.	TV Warren News	TV Warren News	TV Warren News	TV Warren News	City Council (LIVE)	City Council (replay)	TV Warren News	19:00
7:30 p.m.	Life is Good	State of the City	Life is Good	State of the City	City Council (LIVE)	City Council (replay)	Life is Good	19:30
8:00 p.m.	Gong Green	State of the City	Gong Green	State of the City	City Council (LIVE)	City Council (replay)	Gong Green	20:00
8:30 p.m.	People, Parks	State of the City	People, Parks	State of the City	City Council (LIVE)	City Council (replay)	People, Parks	20:30
9:00 p.m.	State of the City	Life is Good	State of the City	Life is Good	City Council (LIVE)	City Council (replay)	State of the City	21:00
9:30 p.m.	State of the City	Gong Green	State of the City	Gong Green	City Council (LIVE)	City Council (replay)	State of the City	21:30
10:00 p.m.	State of the City	People, Parks	State of the City	People, Parks	(BULLETIN BOARD)	People, Parks	State of the City	22:00
10:30 p.m.	TV Warren News	TV Warren News	TV Warren News	TV Warren News	(BULLETIN BOARD)	TV Warren News	TV Warren News	22:30
11:00 p.m.	A Hero's Journey	Veterans Project	A Hero's Journey	Veterans Project	(BULLETIN BOARD)	Veterans Project	A Hero's Journey	23:00
11:30 p.m.	(BULLETIN BOARD)	Veterans Project	(BULLETIN BOARD)	Veterans Project	(BULLETIN BOARD)	Veterans Project	(BULLETIN BOARD)	23:30
12:00 a.m.	TV Warren News	TV Warren News	TV Warren News	TV Warren News	(BULLETIN BOARD)	TV Warren News	TV Warren News	00:00

TV Warren News—What's happening in Warren this week.

Warren State of the City Address—with Warren Mayor James R. Fouts (4/7/16)

A Hero's Journey—The Philip Maceri Story

Planning Commission Meeting (4/14/16)

Warren City Council—LIVE 7 pm Tuesday, replays Wednesday 10 am & 7 pm, early Thursday 3 am

Veterans History Project—Samuel Papandrea, U.S.S. LSM 471, U.S. Navy, 1944-1945

Gong Green in Warren—Strawbale Studio Relocalize Reskill Reconnect

Life is Good in Warren for Seniors—Host: Joan Flynn, Subject: Senior Softball

People, Parks & Programs—Warren Parks & Recreation



Type here to search Entire Mailbox Privacy Options Sign out

Mail Reply Reply All Forward X Junk Close

- Calendar
- Contacts
- Deleted Items
- Drafts
- Inbox (1)
- Junk Email
- Sent Items

RE: state of city

Mayor

Sent: Thursday, March 31, 2016 9:36 AM

To: [Redacted]

Good morning [Redacted]

Please contact Gus at [Redacted] or ticket information.

Click to view all folders

- 2016 SOTC
- Clutter (3)
- Det. New/Free Press
- Human Resources
- Invitations
- MEDC
- Medical Marijuana Regula...
- Personal
- Police
- Property Maintenance
- Manage Folders...

Sincerely,

The Office of Mayor James R. Fouts  
 City of Warren  
 One City Square- Suite 215  
 Warren, MI 48093-6726  
 586-574-4520  
 mayor@cityofwarren.org  
 www.cityofwarren.org

AM

From: [Redacted]

Sent: Wednesday, March 30, 2016 2:16 PM

To: Mayor

Subject: state of city

[http://us.il.yimg.com/us.yimg.com/i/mesg/tsmileys2/01.gif]where can a ticket to state of city address?

Connected to Microsoft Exchange

4/20/2016

RE: Ride-Along? - Tracey Perry

## RE: Ride-Along?

Tracey Perry

Wed 3/16/2016 11:04 AM

To: Beck, Daniel [REDACTED]

It's for the state of the city. I'll make sure it's fully clear.

Sent from my Verizon Wireless 4G LTE smartphone

----- Original message -----

From: "Beck, Daniel" [REDACTED]

Date: 03/16/2016 10:46 AM (GMT-05:00)

To: Tracey Perry [REDACTED]

Subject: RE: Ride-Along?

Tracey,

We can set something up, but Jere wants to make sure the Mayor approves first.

Dan Beck

---

**From:** Tracey Perry [mailto:tperry@cityofwarren.org]

**Sent:** Tuesday, March 15, 2016 2:54 PM

**To:** Beck, Daniel; Green, Jere

**Subject:** Ride-Along?

I need footage of police cars and stuff for state of the city. Can I have Alex Nelson ride along with someone for a few hours? He might need to set up a couple of shots while they're out, like having the car drive in or out of frame.

He's available: Thursday after 1 or Friday around 11am.

Tracey Perry

Communications Director

City of Warren, Michigan

[REDACTED]

# State of the City.

George Mikla

Mon 4/4/2016 3:29 PM

To: DeShon D. Davis [redacted] Alex D Nelson [redacted] Ilse Mahirniak [redacted]  
Christie Laabs [redacted] Nicholas Candela [redacted]  
Austin Crowl [redacted]

Cc: Tracey Perry [redacted]

1 attachment (275 KB)

Warren State of the City REV. 4.4.2016.pdf;

Hello,

Attached is the "State of the City" production book. Call time: Thursday April 7th, 2016 8:30am at Andiamo Warren. Dress in all black for this occasion. Please reply to this E-mail as confirmation.

Thanks,

**George Mikla**  
Production Specialist

O: [redacted]  
F: [redacted]  
E: [redacted]

# Re: Follow Up

Tom Bommarito

Wed 4/6/2016 10:52 AM

To: Tracey Perry [REDACTED]

You're the Best!

---

**From:** Tracey Perry  
**Sent:** Wednesday, April 6, 2016 10:51 AM  
**To:** Tom Bommarito  
**Subject:** Re: Follow Up

I'm available whenever. I have no one on the billboard yet. Been really buried with the State of the City. We'll get on the billboard after tomorrow.

Tracey Perry  
Communications Director  
City of Warren, Michigan  
[REDACTED]  
[REDACTED]

---

**From:** Tom Bommarito  
**Sent:** Wednesday, April 6, 2016 10:35 AM  
**To:** Tracey Perry  
**Subject:** Follow Up

Hi  
Maybe we should begin our meetings about the Sinatra event.  
Walkthrough Macomb next week?  
TB

PS Is someone working on the Mayor's billboard art?

## RE: NOW LATE: Re: Footage and Videos for State of the City

Tracey Perry

Wed 3/9/2016 3:34 PM

Sent Items

To: Eric Williamson [REDACTED];

I found the one. It was in a different folder than everything else.

Both videos will need updating.

Sent from my Verizon Wireless 4G LTE smartphone

----- Original message -----

From: Eric Williamson [REDACTED]  
Date: 03/09/2016 1:52 PM (GMT-05:00)  
To: Tracey Perry [REDACTED]  
Subject: Re: NOW LATE: Re: Footage and Videos for State of the City

I gave you the 2015 events video and talked to you about city with a heart footage. Lori was going to get back with me on where the footage is at. Sorry about the open animation. I've been working on the other videos.

Sent with AquaMail for Android

[REDACTED]  
On March 9, 2016 9:33:20 AM Tracey Perry <tperry@cityofwarren.org> wrote:

This was due Monday. I know Alex is getting more footage of Used Car lots. Still waiting on the rest.

Missing footage:

- 1) Justin - City Square/Tech Center (Drone)
- 2) Anyone - Trailer Parks (GoPro?)
- 3) Anyone - New Roads (can be drone or GoPro)
- 4) Anyone - Used Car Lots
- 5) Eric - State of the City 2016 Animated Open
- 6) Eric - City with a Heart video (•Free Income Tax Help for Seniors •Job Fair •National Day of Prayer •Free Senior Health Seminars •College Fair •Household Hazardous Waste Day •Back to School Supply Drive •Smoke Detector Give-Away •Salvation Army Toy Drive Salvation Army Holiday Food Drive)
- 7) Anyone - Tech Center
- 11) Eric - 2015 Events Video

Tracey Perry  
Communications Director

City of Warren, Michigan  
[REDACTED]  
[REDACTED]

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**From:** Alex D Nelson  
**Sent:** Tuesday, March 8, 2016 11:25 AM  
**To:** Tracey Perry; Nicholas Candela; Justin Crown; Eric Williamson; George Mikla  
**Cc:** Louis Kerman; DeShon D. Davis; Jim Nahirniak  
**Subject:** Re: Footage and Videos for State of the City

I got footage of used car lots, but might need some more.

Alex Nelson  
TV Warren - City of Warren Communication Dept.

Office: [REDACTED]

Cell: [REDACTED]  
[REDACTED]

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**From:** Tracey Perry  
**Sent:** Monday, March 7, 2016 11:43:21 AM  
**To:** Nicholas Candela; Justin Crown; Eric Williamson; George Mikla  
**Cc:** Louis Kerman; DeShon D. Davis; Alex D Nelson; Jim Nahirniak  
**Subject:** Re: Footage and Videos for State of the City

- 1) Justin - City Square/Tech Center (Drone)
- 2) Anyone - Trailer Parks (GoPro?)
- 3) Anyone - New Roads (can be drone or GoPro)
- 4) Anyone - Used Car Lots
- 5) Eric - State of the City 2016 Animated Open
- 6) Eric - City with a Heart video (•Free Income Tax Help for Seniors •Job Fair •National Day of Prayer •Free Senior Health Seminars •College Fair •Household Hazardous Waste Day •Back to School Supply Drive •Smoke Detector Give-Away •Salvation Army Toy Drive Salvation Army Holiday Food Drive)
- 7) Anyone - Tech Center
- 8) ALEX - Senior Housing (Coach & Stilwell) interiors/exterior
- 9) NICK - Flamethrowers (possibly download video from web)
- 10) KEVIN - Fireworks
- 11) Eric - 2015 Events Video
- 12) JIM - LED Street Lights
- 13) KEVIN - Parks & Rec Smart Busses

Tracey Perry  
Communications Director  
City of Warren, Michigan  
[REDACTED]

**From:** Nicholas Candela  
**Sent:** Monday, March 7, 2016 11:27 AM  
**To:** Tracey Perry; Justin Crown; Eric Williamson; George Mikla  
**Cc:** Louls Kerman; DeShon D. Davis; Alex D Nelson; Jim Nahirniak  
**Subject:** Re: Footage and Videos for State of the City

Here are the bits of footage I need for the State of the City. All videos should be assembled and placed on the Archive in the SOTC16 folder. (2-5 minute lengths will be great for most)

Due March 7

EVERYONE is expected to participate

REPLY ALL with the videos you will be handling

- 1) Justin - City Square/Tech Center (Drone)
- 2) Anyone - Trailer Parks (GoPro?)
- 3) Anyone - New Roads (can be drone or GoPro)
- 4) Anyone - Used Car Lots
- 5) Eric - State of the City 2016 Animated Open
- 6) Eric - City with a Heart video (•Free Income Tax Help for Seniors •Job Fair •National Day of Prayer •Free Senior Health Seminars •College Fair •Household Hazardous Waste Day •Back to School Supply Drive •Smoke Detector Give-Away •Salvation Army Toy Drive Salvation Army Holiday Food Drive)
- 7) Anyone - Tech Center
- 8) Anyone - Senior Housing (Coach & Stilwell) interiors/exterior
- 9) NICK - Flamethrowers (possibly download video from web)
- 10) Anyone - Fireworks
- 11) Eric - 2015 Events Video
- 12) Anyone - LED Street Lights
- 13) Anyone - Parks & Rec Smart Busses

**From:** Tracey Perry  
**Sent:** Monday, February 22, 2016 3:35 PM  
**To:** Justin Crown; Eric Williamson; George Mikla  
**Cc:** Louis Kerman; DeShon D. Davis; Nicholas Candela; Alex D Nelson; Jim Nahirniak  
**Subject:** Footage and Videos for State of the City

Here are the bits of footage I need for the State of the City. All videos should be assembled and placed on the Archive in the SOTC16 folder. (2-5 minute lengths will be great for most)

Due March 7

EVERYONE is expected to participate

REPLY ALL with the videos you will be handling

- 1) Justin - City Square/Tech Center (Drone)
- 2) Anyone - Trailer Parks (GoPro?)
- 3) Anyone - New Roads (can be drone or GoPro)
- 4) Anyone - Used Car Lots
- 5) Eric - State of the City 2016 Animated Open
- 6) Eric - City with a Heart video (•Free Income Tax Help for Seniors •Job Fair •National Day of Prayer •Free Senior Health Seminars •College Fair •Household Hazardous Waste Day •Back to School Supply Drive •Smoke Detector Give-Away •Salvation Army Toy Drive Salvation Army Holiday Food Drive)
- 7) Anyone - Tech Center
- 8) Anyone - Senior Housing (Coach & Stilwell) interiors/exterior
- 9) Anyone - Flamethrowers (possibly download video from web)
- 10) Anyone - Fireworks
- 11) Eric - 2015 Events Video
- 12) Anyone - LED Street Lights
- 13) Anyone - Parks & Rec Smart Busses

Tracey Perry  
Communications Director  
City of Warren, Michigan





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

June 2, 2016

Gust Ghanam  
32068 Margaret  
Warren, Michigan 48093

Dear Mr. Ghanam:

The Department of State (Department) received a formal complaint filed by Leon Drolet 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 requires filed campaign finance statements and reports to be complete and accurate. MCL 169.233. A treasurer who knowingly files an incomplete or inaccurate statement or report may be subject to a civil fine of up to \$1,000.00. MCL 169.233(10).

The Act prohibits a corporation from making a contribution to a committee other than a ballot question committee. MCL 169.254.<sup>1</sup> A knowing violation of this section is a felony, punishable by a fine of not more than \$5,000 or imprisonment. MCL 169.254(4). Additionally, Michigan Administrative Rule 169.35 prohibits the treasurer of a committee, other than a ballot question committee, from accepting a contribution written on a check from a corporate account. A person who violates this provision may be subject to a civil fine of up to \$1,000.00 per violation plus triple the amount of each improper contribution. MCL 169.215(11), (15).

In Michigan it is unlawful for a public body or an individual acting on its behalf to use or authorize the use of "funds, personnel, office space, computer hardware or software, property, stationery, postage, vehicles, equipment, supplies, or other public resources to make a contribution or expenditure [.]" MCL 169.257(1). A knowing violation of section 57 is a misdemeanor offense. MCL 169.257(4).

Mr. Drolet alleges that you filed an incomplete or inaccurate campaign statement for the Macomb Businesses United committee (Committee), accepted contributions to the Committee from prohibited sources, and improperly used or authorized the use of public funds or resources with regard to a fundraiser for the Committee.

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<sup>1</sup> Under *Mich Chamber of Commerce v Land*, 725 F Supp 2d 665 (2010), the Department must allow any committee that only makes independent expenditures to accept corporate contributions. However, this ruling does not apply to independent political committees that make direct or in-kind contributions to candidates.

Gust Ghanam  
June 2, 2016  
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. 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. Drolet, 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 57(4) 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: Leon Drolet

# DOSTER LAW OFFICES, PLLC

2145 Commons Parkway  
Okemos, MI 48864

Eric E. Doster  
Email: [eric@ericdoster.com](mailto:eric@ericdoster.com)

(517) 483-2296 (main)  
(517) 977-0147 (direct)  
[www.ericdoster.com](http://www.ericdoster.com)

July 15, 2016

Lori Bourbonais  
Bureau of Elections  
Michigan Department of State  
430 W. Allegan, First Floor  
Lansing, MI 48918

*By Email Transmission*  
*(bourbonaisl@michigan.gov)*

*Re: Response to Campaign Finance Complaint (the "Complaint") Filed by Leon Drolet Dated  
May 23, 2016*

Dear Ms. Bourbonais:

This office represents Gust Ghanam in the above-referenced matter. We have received your letter dated June 2, 2016, which contained the Complaint. The Complaint, which lists only Mr. Ghanam as the Respondent, makes 3 allegations against Mr. Ghanam:

1. Mr. Ghanam, acting on behalf of the City of Warren, used or authorized the use of public resources to benefit Macomb Businesses United PAC (an independent committee registered with the Michigan Department of State), in violation of Section 57 of the Michigan Campaign Finance Act.
2. Mr. Ghanam, as Treasurer of Macomb Businesses United PAC, violated Section 54 of the Michigan Campaign Finance Act by "accepting" corporate contributions to Macomb Businesses United PAC.
3. Mr. Ghanam, as Treasurer of Macomb Businesses United PAC, violated Section 26(d) of the Michigan Campaign Finance Act by failing to complete a separate Fund Raising Schedule for an event held on April 7, 2016 in Warren, Michigan.

For the following reasons, these allegations are without merit, and the Complaint should be dismissed.

**THE COMPLAINT MAKES ABSOLUTELY NO ALLEGATIONS OF FACT THAT MR. GHANAM, ACTING ON BEHALF OF THE CITY OF WARREN, USED OR AUTHORIZED THE USE OF PUBLIC RESOURCES TO BENEFIT MACOMB BUSINESSES UNITED PAC.**

In Section 2 of the Complaint, Mr. Ghanam is referenced as the only Respondent. In Section 3 of the Complaint, one of the alleged violations against Mr. Ghanam is a violation of Section 57 of the Michigan Campaign Finance Act. However, the Complaint alleges absolutely no fact against Mr. Ghanam for violation of Section 57 of the Michigan Campaign Finance Act. Instead:

1. The Complaint attaches a copy of a water bill insert which contained an advertisement for the State of the City Speech;<sup>1</sup> however, assuming for the sake of discussion that this water bill insert represents a violation of Section 57 of the Michigan Campaign Finance Act, there is no allegation that Mr. Ghanam had any involvement with the creation of this water bill insert. Moreover, assuming that the Complaint actually did make such an allegation, such an allegation would be completely false as Mr. Ghanam had no responsibility for this water bill insert, nor does he have the authority to direct or control the content of a water bill insert for the City of Warren.
2. The Complaint appears to suggest that the presence of the City of Warren's government channel, known as "TV Warren" provided a benefit to Macomb Businesses United PAC. According to the Complaint:

"TV Warren is funded by the city's Communications Department and these are all public funds. The city-owned TV cameras were in the banquet hall during the fundraiser, and at least 3-4 cameras were used. City employees staffed these cameras during the fundraiser."

Significantly, the foregoing fails to demonstrate how the presence of "TV Warren" offered any sort of benefit or expenditure to benefit Macomb Businesses United PAC. But more importantly, the Complaint once again completely fails to even suggest that Mr. Ghanam, acting on behalf of the City of Warren, used or authorized the use of "TV Warren" to benefit Macomb Businesses United PAC. Even if the Complaint actually did make such an allegation, such an allegation would be completely false as Mr. Ghanam does not have the authority to authorize or direct "TV Warren" to appear at any event.

3. The Complaint attaches a number of emails to "show the extent to which city employees worked on taxpayer time to promote and prepare for this PAC fundraiser." But again, none of the emails referenced in the Complaint were addressed to or by Mr. Ghanam. In fact, Mr. Ghanam is not even copied on any of

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<sup>1</sup> See Exhibit A of the Complaint.

these emails. Therefore, to attach these emails to a Complaint against Mr. Ghanam once again illustrates the frivolity of the Complaint because these emails allege no violation by Mr. Ghanam of Section 57 of the Michigan Campaign Finance Act.

Significantly, the Complaint does provide a link<sup>2</sup> to an April 9, 2016 article from The Macomb Daily which states the following:

“With his political group directing an event involving local government and politics, Ghanam insists he treaded carefully.

The city’s website made no mention of the event.

‘It’s not a city sponsored event, so it’s not on the website,’ Ghanam said. ‘I don’t want anyone coming to me saying, “You’re using the city’s resources.”’

‘I’ve been doing this on my own time, at night, after work, on lunch.’ said Ghanam, who also oversees the Warren’s residential trash pickup, recycling and compost service.”  
(emphasis supplied)

In addition, the Complaint also provides a link<sup>3</sup> to a May 5, 2016 article from The Macomb Daily which states the following with respect to Mr. Ghanam’s involvement with the water bill insert attached as Exhibit A of the Complaint:

“Reached for comment Thursday, Ghanam said he was unaware of the water bill insert until recently.

‘I heard about it when the complaint was filed. I had no knowledge of it. I didn’t ask for it to be done. The PAC had nothing to do with it,’ the assistant public service director said.

‘To this day, I haven’t seen it. I went out of my way to make sure there was no crossover between the City of Warren and that event,’ he added.

Ghanam pointed out the Macomb Chamber of Commerce has its own PAC but no fuss was raised about that business group’s involvement over the years.

Public Service Director Richard Sabaugh, who also has worked as Fouts’ campaign manager and continues to be his top advisor, said Thursday the content of fliers inserted into water bills is his responsibility.

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<sup>2</sup> See <http://www.macombdaily.com/article/MD/20160409/NEWS/160409634>

<sup>3</sup> See <http://www.macombdaily.com/article/MD/20160505/NEWS/160509750>

'Cover to cover,' Sabaugh told The Macomb Daily. 'The PAC didn't have anything to do with it.'"

Consequently, the only evidence offered by the Complaint with respect to a violation of Section 57 of the Michigan Campaign Finance Act by Mr. Ghanam illustrates that Mr. Ghanam used no City of Warren resources to benefit Macomb Businesses United PAC.

Accordingly, the Complainant's allegations against Mr. Ghanam for violation of Section 57 of the Michigan Campaign Finance Act are contradicted by the Complaint itself. Such an intentional disregard of the facts of this matter constitutes a clear violation of Section 15 of the Michigan Campaign Finance Act. To this end, the Complainant signed Section 4 of the Complaint which indicates as follows:

"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."

However, Section 3 of the Complaint clearly alleges that Mr. Ghanam violated Section 57 of the Michigan Campaign Finance Act, and yet, nothing in the Complaint makes any factual allegation that Mr. Ghanam violated Section 57 of the Michigan Campaign Act. Moreover, as indicated by The Macomb Daily articles referenced in the Complaint itself, Mr. Ghanam used absolutely no public resources to benefit Macomb Businesses United PAC. As a result, the Complainant, by executing Section 4 of the Complaint, has filed a complaint with a false certificate and is responsible for a civil violation of the Michigan Campaign Finance Act.<sup>4</sup> Consequently, the Complaint itself now represents conclusive proof that an appropriate campaign finance complaint may now be filed against the Complainant! Therefore, if anyone should want this matter dismissed, it is the Complainant himself.

**MR. GHANAM, WHO IS NOT A CORPORATION, CANNOT VIOLATE SECTION 54 OF THE MICHIGAN CAMPAIGN FINANCE ACT BY ACCEPTING CORPORATE CONTRIBUTIONS FOR MACOMB BUSINESSES UNITED PAC.**

According to the Complaint:

"The April Quarterly Report filed by the PAC shows that a number of the sponsors and contributors are corporate entities, and are donations [sic] may have been accepted in violation of Section 54 of the Act."

Please note that the contributors set forth on the 2016 April Quarterly Campaign Statement filed by Macomb Businesses United PAC are individuals, committees, or limited liability companies with one exception. This exception is a contribution received from "NTH Consultants LTD." After reviewing the allegations set forth in the Complaint, it was discovered that "NTH Consultants LTD" is an assumed name

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<sup>4</sup> See Section 15(8) of the Michigan Campaign Finance Act.

of a corporation. Of course, when this contribution was accepted by Macomb Businesses United PAC, Mr. Ghanam had absolutely no knowledge that "NTH Consultants LTD" was an assumed name of a corporation. Consequently, immediately upon this discovery, Macomb Businesses United PAC has refunded this contribution to "NTH Consultants LTD." See attached copy of refund check.

Significantly, even though the single contribution from "NTH Consultants LTD" was a contribution from a corporation, Mr. Ghanam did not violate Section 54 of the Michigan Campaign Finance Act because this Section prohibits a corporation (the maker of the contribution) from making a contribution to a committee, not the recipient of the corporate contribution. We recognize that Michigan Administrative Rule 169.35 prohibits the treasurer of a committee from accepting a contribution written on a check from a corporate account; however, there is no penalty for violating Administrative Rule 169.35. While we acknowledge that your June 2, 2016 letter states that a person who violates Administrative Rule 169.35 may be subject to a civil fine, Section 15(15) of the Michigan Campaign Finance Act clearly indicates that only a "person who violates a provision of the this act," not an Administrative Rule, is subject to a civil fine. Moreover, since Mr. Ghanam acted immediately upon discovery of this corporate contribution, even assuming that Mr. Ghanam could be subject to a civil fine in this matter, the imposition of a civil fine would be unwarranted.

**MACOMB BUSINESSES UNITED PAC HAS AMENDED ITS 2016 APRIL QUARTERLY CAMPAIGN STATEMENT TO INCLUDE A FUND RAISER SCHEDULE FOR THE EVENT HELD ON APRIL 7, 2016.**

In its 2016 April Quarterly Campaign Statement, Macomb Businesses United PAC completely and accurately reported all of its contributions and expenditures. As noted in the Complaint, Macomb Businesses United PAC did not file a Fund Raiser Schedule with the 2016 April Quarterly Campaign Statement in accordance with Section 26(d) of the Michigan Campaign Finance Act. Consequently, Macomb Businesses United PAC has now since amended its 2016 April Quarterly Campaign Statement to add a Fund Raiser Schedule for this event on April 7, 2016.<sup>5</sup> Therefore, since Mr. Ghanam filed this Fund Raiser Schedule immediately once it was brought to his attention, any suggestion that Mr. Ghanam knowingly filed an incomplete or inaccurate statement or report defies reality.

It is interesting to note that Leon Drolet, the Complainant in this matter, would file a campaign finance complaint alleging that a Fund Raiser Schedule has not been filed when Mr. Drolet himself has a demonstrated history of failing to file a required Fund Raiser Schedule. For example, the 2004 Post Primary Campaign Statement for the Committee to Elect Leon Drolet contained contributions from the

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<sup>5</sup> See [http://miboecfr.nictusa.com/cgi-bin/cfr/cs\\_option.cgi?com\\_id%3D514906%26doc\\_seq\\_no%3D423767%26doc\\_date\\_proc%3D07/13/2016%26doc\\_stmtnt\\_year%3D2016%26doc\\_type\\_code%3DO3A](http://miboecfr.nictusa.com/cgi-bin/cfr/cs_option.cgi?com_id%3D514906%26doc_seq_no%3D423767%26doc_date_proc%3D07/13/2016%26doc_stmtnt_year%3D2016%26doc_type_code%3DO3A)

Ms. Lori Bourbonais  
July 15, 2016  
Page 6 of 6

following candidate committees: The Committee to Elect James Carabelli, the CTE Daniel Acciavatti, the Committee to Elect Joe Rozell, and the Committee to Elect William Nearon.<sup>6</sup>

However, according to Section 44(2) of the Michigan Campaign Finance Act, a candidate committee may only contribute to another candidate committee at a fundraising event. Significantly, Mr. Drolet's committee, The Committee to Elect Leon Drolet, failed to include a Fund Raiser Schedule of this fundraising event in his 2004 Post Primary Campaign Statement.<sup>7</sup>

Other than pointing out the hypocrisy of Mr. Drolet's Complaint, the point here is that the failure to attach a separate Fund Raiser Schedule, when all contributions and expenditures are completely and accurately reported, is not worthy of a complaint -- particularly when a Fund Raiser Schedule has been provided as in this case.

For the foregoing reasons, the Complaint must be dismissed.

Thank you for your consideration of our comments in this matter. If you have any questions or require additional information, please contact the undersigned.

Sincerely,

DOSTER LAW OFFICES, PLLC



Eric Doster

ED/sjm

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<sup>6</sup> See the Contributions Schedule found at [http://miboecfr.nictusa.com/cgi-bin/cfr/contrib\\_anls\\_res.cgi?doc\\_seq\\_no%3D244759%26doc\\_stmnt\\_year%3D2004%26com\\_id%3D510203%26doc\\_date\\_proc%3D++++%26sched%3D%2A%26doc\\_type\\_code%3DP2%26caller%3Dcf\\_online](http://miboecfr.nictusa.com/cgi-bin/cfr/contrib_anls_res.cgi?doc_seq_no%3D244759%26doc_stmnt_year%3D2004%26com_id%3D510203%26doc_date_proc%3D++++%26sched%3D%2A%26doc_type_code%3DP2%26caller%3Dcf_online)

<sup>7</sup> See the Fund Raiser Schedule found at [http://miboecfr.nictusa.com/cgi-bin/cfr/fund\\_rais.cgi?doc\\_seq\\_no%3D244759%26doc\\_stmnt\\_year%3D2004%26com\\_id%3D510203%26doc\\_date\\_proc%3D++++%26doc\\_type\\_code%3DP2](http://miboecfr.nictusa.com/cgi-bin/cfr/fund_rais.cgi?doc_seq_no%3D244759%26doc_stmnt_year%3D2004%26com_id%3D510203%26doc_date_proc%3D++++%26doc_type_code%3DP2)



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

July 18, 2016

Leon Drolet  
46116 Lookout Drive  
Macomb Township, Michigan 48044

Dear Mr. Drolet:

The Department of State received a response to the complaint you filed against Gust Ghanam, 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 cursive script that reads "Lori A. Bourbonais".

Lori A. Bourbonais  
Bureau of Elections  
Michigan Department of State

c: Eric Doster (via email)