

Campaign Finance Complaint Form
Michigan Department of State

2017 OCT -3 PM 2:00

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.**

I allege that the MCFA was violated as follows:

Section 1. Complainant		
Your Name	John C. King	Daytime Telephone Number (517) 784-3282
Mailing Address	203 3rd Street Apt A	
City	State	Zip
Jackson	MI	49201

Section 2. Alleged Violator		
Name	Charles John Wilson / John Wilson for City Council	
Mailing Address	1045 South Durand	
City	State	Zip
Jackson	MI	49203

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

Section(s) of the MCFA violated: 169.247

Explain how those sections were violated:

John Wilson's literature, mailings, and yard signs have an incomplete disclaimer. Mr Wilson has stated he is solely responsible for his own campaign having stated his campaign staff consists of "me, myself and I". He has run for office over five times and has no excuse to not know and follow the applicable laws.

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

- 1) Picture of yard sign
- 2) Copy of literature
- 3) Copy of letter mailed to voters

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

John C. King
Signature of Complainant

9/28/2017
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

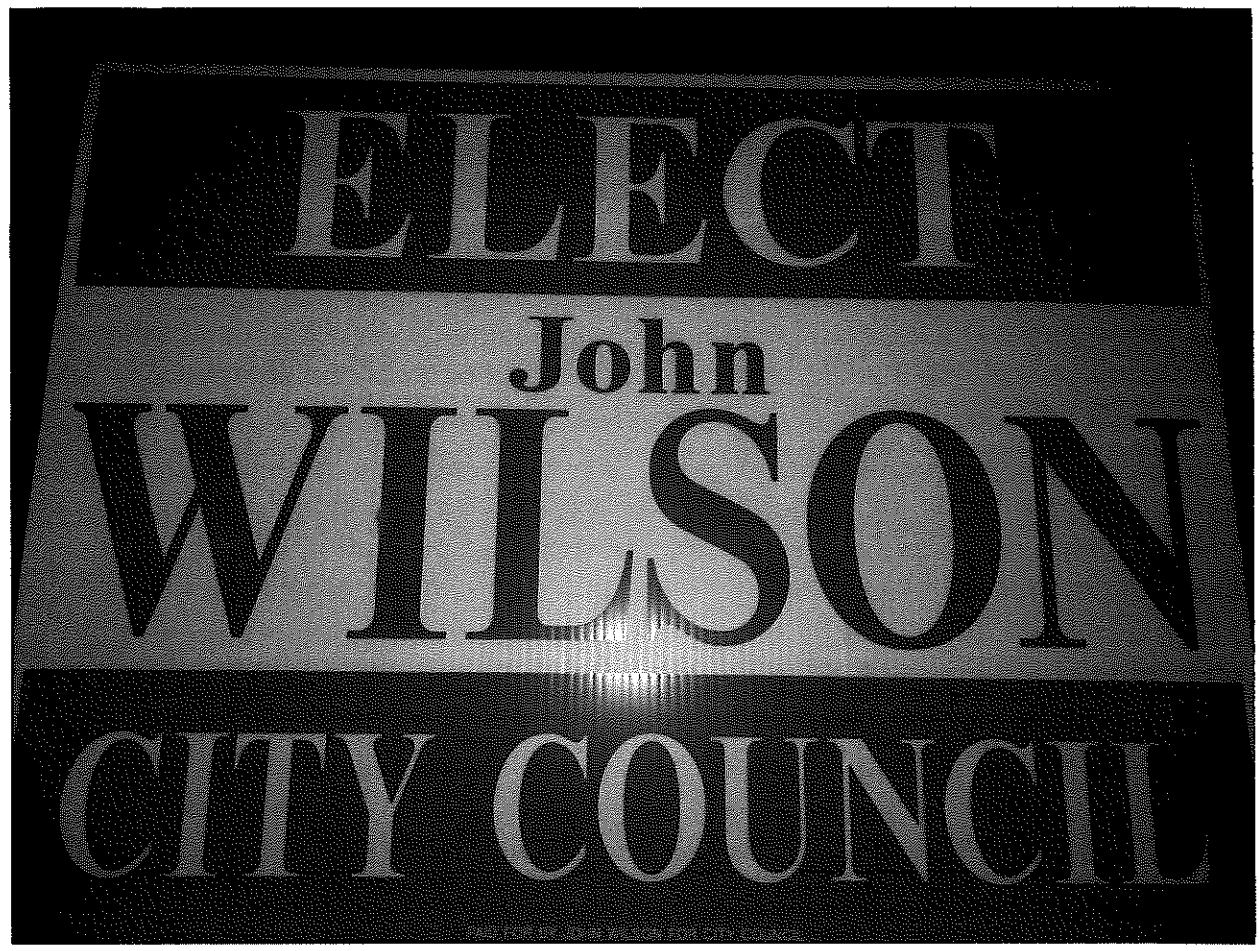
Date

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

1) Picture of yard sign



2) Copy of literature

John Wilson, Candidate - Jackson City Council, 6th Ward

Born and raised in the city of Jackson
Lifelong parishioner of Queen of the Miraculous Medal Parish
Graduate: Lumen Christi High School
Jackson Community College (Jackson College)
Western Michigan University

I'm always asked why I continue to involve myself with local government by either running for office and/or attending council meetings, speaking during public comment on various issues. My answer is simple: It's because I've always cared about the city of Jackson, its residents, and how our tax dollars are spent.

A couple of years ago, the illegal storm water tax along with discontinuing leaf pick-up and street cleaning, turned many against City Hall and our City Council. Today, it's the Non-Discrimination Ordinance (NDO), a tweet, downtown spending, and the Kibby Road project that has angered enough 6th Ward residents which resulted in the recall of Derek Dobies.

The responsible, hard-working and retired citizens of the 6th Ward expect and deserve their councilmember to fight for them to fix and clean our neighborhood streets and to reduce crime without increasing taxes and fees. A handpicked candidate will only further strain relations on the council and with Jackson's residents. That, accomplishes nothing.

As your 6th Ward City Councilmember, I will continue to fight for a better Jackson.

Thank you for your consideration,

John Wilson, Candidate - Jackson City Council, 6th Ward
Paid for by John Wilson for City Council

3) Copy of letter mailed to voters

ELECT
John Wilson
City Councilmember - 6th Ward

Born and raised in the Queen's, Cascades area of the city of Jackson.
Lifelong parishioner of Queen of the Miraculous Medal Church.
Graduate: Lumen Christi High School
Jackson Community College (Jackson College)
Western Michigan University

For too long now, residential areas of the city have not been the priority of City Hall. While the downtown is important and the blueprint for future private development is promising, the infrastructure has been provided for private development to consider locating in the downtown. It's time now for City Hall to reprioritize its focus on the city's neighborhoods.

Voters living in the 6th Ward will have the opportunity on November 7th to choose who they believe will best provide the voice needed with making our neighborhoods drivable, clean and safe, without having to increase taxes or fees. As your representative on City Council, I will be your voice on prioritizing tax dollars to be spent on the basic, essential services for our neighborhoods. It is also a duty of each member of the City Council to promote all of Jackson to retain and attract a responsible citizenry, and to continue making Jackson a business friendly environment.

I would honor the opportunity to serve as your Councilmember.
Thank you for your consideration.

Respectfully,


John Wilson



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

October 4, 2017

Charles John Wilson
John Wilson for City Council
1045 South Durand
Jackson, Michigan 49203

Dear Wilson:

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

The MCFA and corresponding administrative rules require a person who produces printed material that relates to an election to include the phrase "Paid for by [name and address of the person who paid for the item]." MCL 169.247(1), Mich. Admin. R. 169.36(2).

In support of his complaint, Mr. King provided a picture of a sign which states, "ELECT John WILSON CITY COUNCIL [,]" a copy of a flyer which states, "John Wilson, Candidate – Jackson City Council [,]" and a copy of a letter which states, "ELECT John Wilson City Councilmember [,]" Your committee's address appears to be missing from the paid-for-by statements on these materials.

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 the complaint, you are required to do so within 15 business days of the date of this letter. Please include any evidence that reflects any corrective measures you have taken to bring your campaign material into compliance with the MCFA. Your response may include any written statement or additional documentary evidence you wish to submit. All materials must be sent to the Department of State, Bureau of Elections, Richard H. Austin Building, 1st Floor, 430 West Allegan Street, Lansing, Michigan 48918. If you fail to submit a response, the Department will render a decision based on the evidence furnished by the complainant.

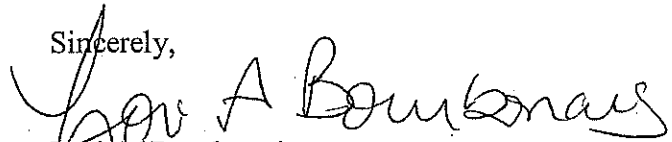
A copy of your reply will be provided to Mr. King, who will have an opportunity to submit a rebuttal statement to the Department. After reviewing all of the statements and materials provided by the parties, the Department will determine whether "there may be reason to believe

Charles John Wilson
October 4, 2017
Page 2

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 penalty provided in section 47(6) of the Act.

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

Sincerely,

A handwritten signature in black ink that reads "Lori A. Bourbonais". The signature is written in a cursive style with a large initial "L".

Lori A. Bourbonais
Bureau of Elections
Michigan Department of State

c: John C. King



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

December 11, 2017

John C. King
203 3rd Street
Jackson, MI 49201

Dear Mr. King:

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

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

Sincerely,

A handwritten signature in black ink, appearing to read "David Foster".

David Foster
Bureau of Elections
Michigan Department of State

c: Charles John Wilson

RECEIVED/FIL
MICHIGAN DEPT OF
ELECT
John Wilson
2017 OCT 27 PM 2:44
City Councilmember 6th Ward
ELECTIONS/GREAT

Born and raised in the Queen's, Cascades area of the city of Jackson.
Lifelong parishioner of Queen of the Miraculous Medal Church.
Graduate: Lumen Christi High School
Jackson Community College (Jackson College)
Western Michigan University

The swamp continues to fill, right here in our own backyard. We now have an extremist faction of a local political Party financially supporting candidate Jeffrey Feahr. Why is it a priority to hold a \$25 - \$1,000 campaign fundraiser for a non-partisan city council seat? Answer: To buy a politician. My priority as an elected official will be the responsible, hard-working and retired citizen taxpayers of Jackson, and not any political Party or special interest groups.

Voters living in the 6th Ward will have the opportunity on November 7th to choose who they believe will best provide the voice needed with making our neighborhoods drivable, clean and safe, without having to increase taxes or fees. As your representative on City Council, I will be your voice on prioritizing tax dollars to be spent on the basic, essential services for our neighborhoods. It is also a duty of each member of the City Council to promote all of Jackson to retain and attract a responsible citizenry, and to make changes so City Hall is a more welcoming environment for a business that would like to open or expand here.

I would honor the opportunity to serve as your Councilmember.
Thank you for your consideration.

Respectfully,

John Wilson

Paid for by John Wilson for City Council 1045 S. Durand St. (517) 784-0158

Paid for by John Wilson for City Council 1045 S. Durand St. (517) 784-0158



Note: Above was laminated and applied to 27 yard signs placed on private properties.

ELECT
John Wilson
City Councilmember - 6th Ward

Born and raised in the Queen's, Cascades area of the city of Jackson.
Lifelong parishioner of Queen of the Miraculous Medal Church.
Graduate: Lumen Christi High School
Jackson Community College (Jackson College)
Western Michigan University

For too long now, residential areas of the city have not been the priority of City Hall. While the downtown is important and the blueprint for future private development is promising, the infrastructure has been provided for private development to consider whether or not to locate in the downtown. It's time now for City Hall to reprioritize its focus on the city's neighborhoods.

Voters living in the 6th Ward will have the opportunity on November 7th to choose who they believe will best provide the voice needed with making our neighborhoods drivable, clean and safe, without having to increase taxes or fees. As your representative on City Council, I will be your voice on prioritizing tax dollars to be spent on the basic, essential services for our neighborhoods. It is also a duty of each member of the City Council to promote all of Jackson to retain and attract a responsible citizenry, and to continue making Jackson a business friendly environment.

I would honor the opportunity to serve as your Councilmember.
Thank you for your consideration.

Respectfully,


John Wilson

Paid for by John Wilson for City Council 1045 S. Durand St. (517) 784-0158

ELECT JOHN WILSON
Jackson City Councilmember - 6th Ward

Born and raised in the Queen's, Cascades area of the city of Jackson.
Lifelong parishioner of Queen of the Miraculous Medal Church.
Graduate: Lumen Christi High School
Jackson Community College (Jackson College)
Western Michigan University

According to the Jackson County Republican Party, you should vote for the following candidate who:

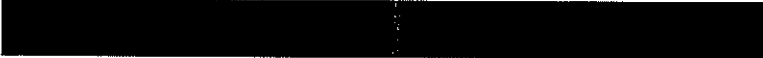
***Raised and trained pit bulls to fight, often leading to the dog's death.**

***Gave up parental rights with his children, left the country and moved to Thailand.**

Jeffrey Feahr, sponsored by and paid for by the Jackson County Republican Party. If you want a Party puppet controlled by the Party's establishment extremists, then Feahr is your candidate. An election should be about the issues and not about a candidate's past history. But, when a political Party spends big money in a non-partisan election to create their perfect candidate with a not so perfect past, attempts to dissuade other candidates from entering the race so their Party puppet can win, then the gloves come off.

Corruption at City Hall is an issue. Whether it's meeting behind closed doors working out a secretive real-estate deal with City Hall purchasing downtown property for private developers, or, attempts to cover up a City Hall embezzlement, we don't need a political Party involved calling the shots. As your Councilmember, I will represent the responsible, hard-working and retired citizens and how your tax dollars are spent, rather than any political Party. A City Council election should not involve any political Party and its big money to buy a candidate!





**VOTE
JOHN WILSON
CITY COUNCIL, 6th WARD**


Priority - The responsible, hard-working
and retired citizen taxpayers of Jackson.

Priority - A fully staffed police/fire force.

Priority - Less spending of tax dollars for
private, downtown development.

Priority - Begin discussions with County on
contracting out with the Jackson County Dept.
of Transportation for city street repair, maintenance
and shared services with the Dept. of Public Works.

Clean, well paved streets and safe neighborhoods
will be the catalyst for economic growth throughout
all the city of Jackson.



John Wilson for City Council

1045 S. Durand Street

Jackson, MI 49203

(517) 784-0158

John Wilson, Candidate - Jackson City Council, 6th Ward

Born and raised in the city of Jackson
Lifelong parishioner of Queen of the Miraculous Medal Parish
Graduate: Lumen Christi High School
Jackson Community College (Jackson College)
Western Michigan University

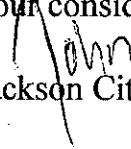
I'm always asked why I continue to involve myself with local government by either running for office and/or attending council meetings, speaking during public comment on various issues. My answer is simple: It's because I've always cared about the city of Jackson, its residents, and how our tax dollars are spent.

A couple of years ago, the illegal storm water tax along with discontinuing leaf pick-up and street cleaning, turned many against City Hall and our City Council. Today, it's the Non-Discrimination Ordinance (NDO), a tweet, downtown spending, and the Kibby Road project that has angered enough 6th Ward residents which resulted in the recall of Derek Dobies.

The responsible, hard-working and retired citizens of the 6th Ward expect and deserve their councilmember to fight for them to fix and clean our neighborhood streets and to reduce crime without increasing taxes and fees. A handpicked candidate will only further strain relations on the council and with Jackson's residents. That, accomplishes nothing.

As your 6th Ward City Councilmember, I will continue to fight for a better Jackson.

Thank you for your consideration,


John Wilson, Candidate - Jackson City Council, 6th Ward
Paid for by John Wilson for City Council



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

September 27, 2018

Charles John Wilson
John Wilson for City Council
1045 South Durand
Jackson, Michigan 49203

Dear Mr. Wilson:

The Department of State (Department) has concluded its investigation into the formal complaint filed by John King against you, alleging that you violated section 47(1) of the Michigan Campaign Finance Act (MCFA), 1976 PA 388, MCL 169.247(1), by failing to include a complete and correct identification statement on certain campaign materials. From the outset, the Department apologizes for the delay in processing this complaint. Regrettably, the complaint was misfiled in our office and was not caught until recently.

The MCFA and corresponding administrative rules require a person who produces printed material that relates to an election to include the phrase "Paid for by [name and address of the person who paid for the item]." MCL 169.247(1), Mich. Admin. R 169.36(2).

In support of his complaint, Mr. King provided a picture of a sign which states, "ELECT John WILSON CITY COUNCIL [,]" a copy of a flyer which states, "John Wilson, Candidate – Jackson City Council [,]" and a copy of a letter which states, "ELECT John Wilson City Councilmember [,]"

You filed a response that was received by our office on October 17, 2018 essentially indicating that your full address has been laminated and placed on yard signs that were in circulation.

Upon review, it appears that the paid for by statement was either omitted entirely from campaign materials or is incomplete in violation of MCL 169.247. Your yard signs failed to contain a proper paid for by statement and materials you mailed contained a paid for by statement which failed to provide the address of the committee paying for the materials.

Given this, the Department is hereby advising you that MCL 169.247(1) and R 169.36(2) require you to print a complete and accurate identification statement on all campaign materials, consisting of the phrase "paid for by" followed by the full name and address of your committee. Note that all printed materials that refer to an election or your candidacy produced in the future must include this identification statement.

Please be advised that this notice has served to remind you of your obligation under the Act to identify your printed matter and may be used in future proceedings as evidence that tends to

Charles John Wilson

October 4, 2017

Page 2

establish a knowing violation of the Act. A knowing violation is a misdemeanor offense and may merit referral to the Attorney General for enforcement action. MCL 169.247(6), 215(10). The Department considers the instant action closed and resolved.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam Fracassi". The signature is stylized with a large, sweeping flourish at the end.

Adam Fracassi
Bureau of Elections
Michigan Department of State

c: John C. King