



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

August 14, 2012

Jessica Cooper  
30150 Telegraph Road  
Suite 373  
Bingham Farms, Michigan 48025

Dear Ms. Cooper:

The Department of State (Department) received a formal complaint filed by Adam Raezler 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 these complaints is governed by section 15 of the Act and the corresponding administrative rules, R 169.51 *et seq.* Copies of the complaint and supporting documentation are enclosed with this letter.

Mr. Raezler alleges that you have improperly used public funds for a political endorsement.

In Michigan, it is unlawful for a public body or individual acting on its behalf to use 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(3).

In support of his complaint, Mr. Raezler provided a copy of a Facebook page that includes a letter on Oakland County Prosecuting Attorney letterhead endorsing Derek Meinecke for 44<sup>th</sup> District Court Judge.

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 reply will be provided to Mr. Raezler, 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

Jessica Cooper  
August 14, 2012  
Page 2

administrative hearing, or referring this matter to the Attorney General for enforcement of the criminal penalty provided in section 57(3) 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: Adam Raezler

Michigan Department of State  
Campaign Finance Complaint Form

Reset Form

BUREAU OF ELECTIONS  
MI DEPT OF STATE

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.).

2012 AUG -7 AM 9:05

Please print or type all information.

I allege that the MCFA was violated as follows:

<b>Section 1. Complainant</b>		
Your Name	Adam Raczler	Daytime Telephone Number
		249 677 3263
Mailing Address		
4371 Coolidge Hwy		
City	Royal Oak	State
	MI	Zip
		48073

<b>Section 2. Alleged Violator</b>		
Name	Jessica Cooper	
Mailing Address		
30150 Telegraph Road Suite 373		
City	Bingham Farms	State
	MI	Zip
		48025

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

Section(s) of the MCFA violated:

169.257, Section 1

Explain how those sections were violated:

The improper use of stationary for a political endorsement.

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

A letter submitted on behalf of a candidate for District Judge by Oakland County Prosecutor Jessica Cooper on county stationary. Letter was pulled off a Facebook post by Chief Assistant Prosecutor Paul Walton.

**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

7/30/12  
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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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 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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Mary Belle Snow likes Daniel Silva.



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MGoBernstein  
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Jennifer Labit  
Like



David Thomson likes Drew McKissick.



Drew McKissick  
Like



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TO: Citizens of Royal Oak  
FROM: Jessica R. Cooper, Oakland County Prosecutor  
DATE: June 14, 2012  
RE: Endorsement of Derek Meinecke for 44th District Court Judge

Derek Meinecke is absolutely the best choice for 44th District Court Judge. I can talk to you about his professional qualifications—he is bright and capable with a strong work ethic—but, what makes him an outstanding candidate for this office is his character, his integrity, his calm temperament and his compassion for others.

Without question, Derek has the experience and professional expertise to assume the bench. He has served the Oakland County Prosecutor's office with distinction for over a decade.

He has practiced before every Circuit Court and District Court Judge in Oakland County and has honed his trial skills in all manner of cases, misdemeanors as well as felonies. Whether the case is a complicated rape or an elder abuse trial or a domestic violence misdemeanor, each victim is treated with respect and dignity. Each case, no matter how large or how small, is prosecuted fairly, ethically and toward a just end.

These are the professional qualities we look for in a Judge. Additionally, Derek is a dedicated community leader and family man. He gives his time and his energy to youth programs and charitable and civic groups. He has been honored for his work with vulnerable adults and individuals who have been subjected to domestic violence.

The most important characteristics of a Judge, as well as a Prosecutor, are humanity and compassion. Derek is one of the finest examples of a compassionate and dedicated individual that I have ever met.

I am proud and honored to support Derek as your next 44th District Court Judge.

Sincerely,

Jessica R. Cooper  
JRC/dmd





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

August 31, 2012

Adam Raezler  
4371 Coolidge Highway  
Royal Oak, Michigan 48073

Dear Mr. Raezler:

The Department of State received a response to the complaint you filed against Jessica Cooper, 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: Jessica Cooper

August 22, 2012

Ms. Lori A. Bourbonais  
Bureau of Elections  
Michigan Department of State  
430 West Allegan  
Lansing, Michigan 48918

BUREAU OF ELECTIONS  
MI DEPT OF STATE  
2012 AUG 29 PM 3: 56

Re: Your letter dated August 14, 2012

Dear Ms. Bourbonais:

My campaign office is in receipt of a letter dated August 14, 2012, containing a Campaign Finance Complaint from Adam Raezler alleging a violation of MCL 169.257, section (1). His Complaint alleges a violation and claims that it is an improper use of stationary for a political endorsement.

MCLA 169.257 states:

- (1) A public body or a person acting for a public body shall not 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 that are excluded from the definition of contribution under section 4(3)(a). The prohibition under this subsection includes, but is not limited to, using or authorizing the use of public resources to establish or administer a payroll deduction plan to directly or indirectly collect or deliver a contribution to, or make expenditure for a committee. Advance payment or reimbursement to a public body does not cure a use of public resources otherwise prohibited by this subsection. This subsection does not apply to any of the following:
  - (a) The expression of views by an elected or appointment public official who has policy making responsibilities;
  - (b) The production or dissemination of factual information concerning issues relevant to the function of the public body;
  - (c) The production or dissemination of debates, interviews, commentary, or information by a broadcasting station, newspaper, magazine, or other periodical or publication in the regular course of broadcasting or publication;
  - (d) The use of a public facility owned or leased by, or on behalf of, a public body if any candidate or committee has an equal opportunity to use the public facility;
  - (e) The use of a public facility owned or leased by, or on behalf of, a public body if that facility is primarily used as a family dwelling and is not used to conduct a fund-raising event;

Page two  
August 22, 2012

- (f) An elected or appointed public official or an employee of a public body who, when not acting for a public body but is on his or her own personal time, is expressing his or her own personal views, is expending his or her own personal funds, or is providing his or her own personal volunteer services.

Please note the specific exemption in the very last line of section (1) and subsection (a) of the statute. Please be advised that I am the elected Prosecutor of Oakland County and, as such, I am the Chief Law Enforcement Officer of the County with enumerable policy making responsibilities and, as such, I am specifically exempted from the statute. The letter was an expression of my view as to the qualifications of a nonpartisan judicial candidate.

It is my understanding that Mr. Meinecke, who is as shocked as I am at this spurious allegation, has removed the letter from his Facebook page . I am assuming my picture on the Facebook page was taken from some source on the internet and superimposed on the letter.

I hope this letter is sufficient for your investigation. Please do not hesitate to contact me should you require any further information.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jessica R. Cooper', with a long horizontal flourish extending to the right.

Jessica R. Cooper  
Oakland County Prosecutor

JRC/dmd



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

September 17, 2012

Jessica Cooper  
30150 Telegraph Road  
Suite 373  
Bingham Farms, Michigan 48025

Dear Ms. Cooper:

This letter concerns the complaint that was recently filed against you by Adam Raezler, which relates to a purported violation of the Michigan Campaign Finance Act (MCFA), 1976 PA 388, MCL 169.201 *et seq.* The Department of State has received a rebuttal statement from the complainant, a copy of which is enclosed with this letter.

Section 15(10) of the MCFA, MCL 169.215(10), requires the Department to determine within 60 business days from the receipt of the rebuttal statement whether there is a reason to believe that a violation of the Act has occurred. Mr. Raezler's complaint remains under investigation at this time. At the conclusion of the review, all parties will receive written notice of the outcome of the complaint.

Sincerely,

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

Lori A. Bourbonais  
Bureau of Elections  
Michigan Department of State

c: Adam Raezler

September 10, 2012

2012 SEP 14 PM 3: 25

Lori Bourbonias  
Bureau of Elections  
Michigan Department of State

Dear Ms. Bourbonais –

The purpose of this letter is to reply to the letter that you sent me in regards to the complaint that I filed against Ms. Jessica Cooper.

1. Ms. Cooper's feigned outrage and expression of being "shocked" at "spurious allegations" are rather amusing. Considering the statute, the letter in the form it was printed was prima facie evidence of a violation.
2. I am well aware that Ms. Cooper is the elected Oakland County Prosecutor with enumerated duties. One of which is to uphold the law, not to violate it. I am shocked that a prosecutor, former judge and attorney cannot read a statute more clearly. The exemption Ms. Cooper claims (a) does not give her the right to use government resources including stationery, it merely clarifies that none of the restrictions on the use of such resources is not to be taken in a way that restricts the right of the public official to express PERSONAL political opinions and/or make endorsements. Ms. Cooper's reading of the law here is either spurious, to use her word, and meant to delay or obfuscate this matter, or displays a serious deficiency in her abilities.
3. Ms. Cooper states that someone must have imposed her picture on the letterhead and that Mr. Meinecke has removed this letter from his facebook. Why? If Ms. Cooper is correct that this was a proper use of the resources and trappings of her office, why not leave it up? It beggars belief, however, that this all comes as a suprise to Ms. Cooper. As the enclosed copy of her Chief Deputy Paul Walton's facebook page shows, he also reposted this supposed forgery on his home page. Mr. Walton is also a named person on Ms. Cooper's letterhead. Who is Ms. Cooper alleging to have participated in this conspiracy? If this was done without her knowledge, has she taken disciplinary action against either Mr. Meinecke or Mr. Walton, both of whom are her employees?
4. Upon further review of the documents, it appears that Ms. Cooper-- and by extension Mr. Meinecke and Mr. Walton-- are also in violation of the following statute regarding the state coat of arms, which appears on Ms. Cooper's letterhead.

Unlike the Great Seal, the Coat of Arms may be printed on documents, stationery, or ornaments with no design or words and disconnected with any advertisement. (MCL 750.247) However, a person who improperly exhibits and displays the Coat of Arms is guilty of a misdemeanor. (MCL 750.245)

I urge the Secretary of State to reign in this out of control public official who seems to think it's proper to say, "I'm from the government and here is how you should vote."

I thank you for your time and your efforts to help hold elected officials accountable.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam Raezler". The signature is stylized with a large, sweeping loop at the end and a sharp downward stroke at the beginning.

Adam Raezler

4371 Coolidge Hw

Royal Oak, MI 48073

571-230-3324



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

August 31, 2012

Adam Raezler  
4371 Coolidge Highway  
Royal Oak, Michigan 48073

Dear Mr. Raezler:

The Department of State received a response to the complaint you filed against Jessica Cooper, 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: Jessica Cooper

August 22, 2012

Ms. Lori A. Bourbonais  
Bureau of Elections  
Michigan Department of State  
430 West Allegan  
Lansing, Michigan 48918

BUREAU OF ELECTIONS  
MI DEPT OF STATE  
2012 AUG 29 PM 3:56

Re: Your letter dated August 14, 2012

Dear Ms. Bourbonais:

My campaign office is in receipt of a letter dated August 14, 2012, containing a Campaign Finance Complaint from Adam Raezler alleging a violation of MCL 169.257, section (1). His Complaint alleges a violation and claims that it is an improper use of stationery for a political endorsement.

MCLA 169.257 states:

- (1) A public body or a person acting for a public body shall not 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 that are excluded from the definition of contribution under section 4(3)(a). The prohibition under this subsection includes, but is not limited to, using or authorizing the use of public resources to establish or administer a payroll deduction plan to directly or indirectly collect or deliver a contribution to, or make expenditure for a committee. Advance payment or reimbursement to a public body does not cure a use of public resources otherwise prohibited by this subsection. This subsection does not apply to any of the following:
  - (a) The expression of views by an elected or appointment public official who has policy making responsibilities;
  - (b) The production or dissemination of factual information concerning issues relevant to the function of the public body;
  - (c) The production or dissemination of debates, interviews, commentary, or information by a broadcasting station, newspaper, magazine, or other periodical or publication in the regular course of broadcasting or publication;
  - (d) The use of a public facility owned or leased by, or on behalf of, a public body if any candidate or committee has an equal opportunity to use the public facility;
  - (e) The use of a public facility owned or leased by, or on behalf of, a public body if that facility is primarily used as a family dwelling and is not used to conduct a fund-raising event;

Page two  
August 22, 2012

- (f) An elected or appointed public official or an employee of a public body who, when not acting for a public body but is on his or her own personal time, is expressing his or her own personal views, is expending his or her own personal funds, or is providing his or her own personal volunteer services.

Please note the specific exemption in the very last line of section (1) and subsection (a) of the statute. Please be advised that I am the elected Prosecutor of Oakland County and, as such, I am the Chief Law Enforcement Officer of the County with enumerable policy making responsibilities and, as such, I am specifically exempted from the statute. The letter was an expression of my view as to the qualifications of a nonpartisan judicial candidate.

It is my understanding that Mr. Meinecke, who is as shocked as I am at this spurious allegation, has removed the letter from his Facebook page. I am assuming my picture on the Facebook page was taken from some source on the internet and superimposed on the letter.

I hope this letter is sufficient for your investigation. Please do not hesitate to contact me should you require any further information.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jessica R. Cooper', with a long horizontal flourish extending to the right.

Jessica R. Cooper  
Oakland County Prosecutor

JRC/dmd



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

December 20, 2012

Jessica Cooper  
Oakland County Prosecutor  
30150 Telegraph Road  
Suite 373  
Bingham Farms, Michigan 48025

Dear Ms. Cooper:

The Department of State (Department) has completed its initial investigation of the complaint filed against you by Adam Raezler, which alleged that you violated section 57 of the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.257. This letter concerns the disposition of the complaint.

The MCFA prohibits a public body or an individual acting on its behalf from "us[ing] or authoriz[ing] 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). The words "contribution" and "expenditure" are generally defined, in pertinent part, to include anything of ascertainable monetary value that is used to influence or assist a candidate's nomination or election. MCL 169.204(1), 169.206(1). A knowing violation of section 57 is a misdemeanor offense. MCL 169.257(3).

Expenditure is a term of art which includes "a payment, donation, loan, or promise of payment of money or anything of ascertainable monetary value for goods, materials, services, or facilities in assistance of, or in opposition to, the nomination or election of a candidate [.]" MCL 169.206(1).

The Act also requires the Department to "endeavor to correct the violation or prevent a further violation by using informal methods [.]" if it finds that "there may be reason to believe that a violation ... has occurred [.]" MCL 169.215(10). The objective of an informal resolution is "to correct the violation or prevent a further violation [.]" *Id.*

Mr. Raezler filed his complaint on August 7, 2012. You filed an answer on August 29, 2012, and Mr. Raezler filed a rebuttal statement on September 14, 2012.

Mr. Raezler alleged that you improperly used public funds for a political endorsement. As evidence, Mr. Raezler provided a copy of a Facebook page which included a memo to the Citizens of Royal Oak on Oakland County Prosecuting Attorney letterhead endorsing Derek Meinecke for 44<sup>th</sup> District Court Judge. The memo is signed by you. The memo states that "Derek Meinecke is absolutely the best choice for 44<sup>th</sup> District Court Judge [.]" and that you are "proud and honored to support Derek as your next 44<sup>th</sup> District Court Judge."

In response, you stated that as the elected Prosecutor of Oakland County you are “the Chief Law Enforcement Officer of the County with enumerable policy making responsibilities [.]” You assert that as such, you are “specifically exempted from the statute” and that “[t]he letter was an expression of [your] view as to the qualifications of a nonpartisan judicial candidate.” You further stated that the letter had been removed from the Facebook page where it had appeared.

The Department applies the “express advocacy test” to communications to determine if they are subject to the Act. *Interpretive Statement to David Murley* (Oct. 31, 2005).<sup>1</sup> The MCFA provides that a communication that “does not support or oppose a ballot question or candidate by name or clear inference” is not subject to the requirements and limitations of the MCFA. MCL 206(2)(b). A communication that expressly supports or opposes a candidate contains words such as “vote for,” “vote against,” “support,” “defeat,” or equivalent words or phrases.<sup>2</sup>

The memo that appeared on the Oakland County Prosecuting Attorney letterhead stated that you “support” Mr. Meinecke as 44<sup>th</sup> District Court Judge, and that he is “absolutely the best choice for 44<sup>th</sup> District Court Judge.” By using the words “support” and “best choice” this communication expressly supports Derek Meinecke as a candidate and is an endorsement of his candidacy. As such, it falls under the umbrella of the MCFA.

Section 57 of the Act specifically covers elected officials, but does provide some narrow exceptions.<sup>3</sup> One of the exceptions is for “[t]he expression of views by an elected or appointed public official who has policy making responsibilities.” MCL 169.257(1)(a). Your response to the complaint argues that this exception applies to you as the Oakland County Prosecuting Attorney and the memo to the Citizens of Royal Oak. However, under the plain language of section 57, public bodies and persons who act on their behalf are prohibited from using public resources to effectuate a contribution or expenditure. MCL 169.257(1). The Prosecuting Attorney’s office is a public body under the Act. MCL 169.211(7). Indeed, the statutory definition of “public body” encompasses offices held by state and local elected officials, the boards, commissions and agencies headed by their appointees, and “[a]ny other body that is created by state or local authority or is primarily funded by or through state or local authority, which body exercises governmental or proprietary authority or performs a governmental or proprietary function.” *Id.* The suggestion that section 57 does not apply to the Prosecuting Attorney because of his or her “enumerable policy making responsibilities” begs the question, if the statute does not apply to this official or his or her office, to whom does it apply?

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<sup>1</sup> [http://www.mi.gov/documents/2005 - Interpretive\\_Statement\\_142179\\_7.pdf](http://www.mi.gov/documents/2005 - Interpretive_Statement_142179_7.pdf).

<sup>2</sup> The United States Supreme Court, in *Buckley v Valeo*, 424 US 1 (1976), held that the term “expenditure” included only funds used for “communications that expressly advocate the election or defeat of a clearly identified candidate.” The Court explained that express advocacy includes communications that contain “express words of advocacy of election or defeat, such as ‘vote for,’ ‘elect,’ ‘support,’ ‘cast your ballot for,’ ‘Smith for Congress,’ ‘vote against,’ ‘defeat,’ ‘reject [.]’” *Id.* at 44, n 52.

<sup>3</sup> See MCL 169.257(1)(a)-(f).

Further, the exception in section 57(1)(a) does not allow a public official to use public funds to specifically endorse a candidate. While this exception would allow a public official to express his or her views regarding a matter pending before a public body, it does not authorize a public official to utilize public resources to endorse a candidate. Any expenditure made to endorse a candidate should be made with committee funds.

Because the endorsement letter was printed on official government letterhead, it is reasonable to conclude that it was composed during regular working hours by county personnel who used public resources including office space, a computer, and paper for this purpose. Section 57 was enacted to prevent precisely this type of conduct. The costs incurred by taxpayers to compensate employees for this type of work and purchase office supplies to replace those consumed for campaign purposes should not be paid for by the public at large. Taxpayers have a right to expect that the public resources they subsidize will not be used to assist or oppose candidates seeking nomination or election to elective office. It does not fall within the recognized exceptions of section 57, and for this reason, the Department concludes that "there may be a reason to believe" that you violated section 57 of the Act by making an expenditure to endorse Mr. Meinecke. Upon making this determination the Department is required by law to attempt to resolve the matter informally. MCL 169.215(10).

**By January 9, 2013**, please provide the Department with the number of memos that were printed on Oakland County letterhead, the amount of time taken to draft, proof, and distribute the endorsement letter, the number of staff members utilized in its production, and the manner in which it was distributed to the Citizens of Royal Oak. Please include any printing, postage, and envelope costs if it was mailed to residents. Also, please provide the cost to the County for the letterhead. The Department will use this information to draft an appropriate conciliation agreement. "Unless violated, a conciliation agreement is a complete bar to any further civil or criminal action with respect to matters covered in the conciliation agreement." MCL 169.215(10).

If you are not inclined to enter into a conciliation agreement, please be advised that the Department must refer this matter to the Attorney General for enforcement of the criminal penalty provided in MCL 169.257(3). MCL 169.215(10)(a).

Sincerely,

  
Lori Bourbonais  
Bureau of Elections  
Michigan Department of State

c: Adam Raezler