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MICHIGAN DEPT OF STATE  
2018 JUN 20 PM 1:38  
ELECTIONS/GREAT SEAL

Chase Turner  
21320 Woodland Glen Drive  
Northville, MI 48167

Adam L.S. Fracassi  
Bureau of Elections  
430 W Allegan, 1st Floor  
Lansing, MI 48918

June 18, 2018

Dear Mr. Fracassi;

This responds to your letter of June 5, 2018 regarding compliance with MCL 169.247. As a first time candidate, compliance is an important issue as any claim by an incumbent is magnified. We appreciate your assistance.

Paragraph five of your letter requested "evidence demonstrating" compliance with the requirement to have the "paid for" language added to printed campaign material and evidence that our website has this "paid for" language, too. To that end, attached is a current campaign mailer with the "paid for" language. Also attached is a screenshot of my campaign website (<https://www.chaseturner.org/>) which illustrates compliance with the "paid for" language.

We are happy to provide the requested material, but we also add more details for your background.

The printed campaign material provided was the first item we printed. These were not mailers, rather cards handed out by me.

We printed a very small quantity and on delivery noted that the "paid for" language did not get picked up at the printer. In response to this printing error, volunteers hand applied a label with the "paid for" language onto each printed item. Subsequent print runs corrected this printing error.

So, the person who filed the complaint or another person apparently *removed* the label applied with the "paid for" language. It is unfortunate that in a contested election such as this, activists for the opposing candidate or someone else felt compelled to remove a label which then enables a claim non-compliance. A printed label was on the item. That label was removed by someone. That is discouraging behavior by someone.

We appreciate that your letter concludes with the statement that you consider this matter closed and resolved. We do, too. If you have further questions, please call me at 248-794-0795.

Sincerely,



Chase Turner



Candidate for Michigan 38th House

Attachments:

Mailer sample

Website screenshot

Paid for by the Vote Chase Turner Committee, 21320 Woodland Glen Drive, Northville, MI  
48167



# WHERE I STAND

- Pro-Life
- Pro-Second Amendment
- Smaller Government & Better Roads
- Less Taxes

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# WHO I AM

- Grandson of Marilyn Turner
- Oakland County Native
- College Athlete
- University of Michigan - Dearborn

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Paid for by the Vote Chase Turner Committee

21320 Woodland Glen Dr. #101, Northville MI, 48167





# Chase Turner

**Pro Life    Pro 2nd Amendment  
Pro Smaller Government**

- My OPPONENT voted against a promised income tax decrease
- My OPPONENT voted for a HUGE tax increase to "fix the roads"
- My OPPONENT voted for a tax on your HOME to support businesses



*"Chase: I appreciate your fire getting into this. You've got my full support in your race."*

*- State Senator Pat Colbeck*

## Vote Change Vote Chase

Paid for by the Vote Chase Turner Committee | 21320 Woodland Glen Dr. #101, Northville, MI 48167



# Chase Turner



*"John and I have always been proud of our grandson Chase. It's so good to see his strong values being put to use to serve the community"*

*Marilyn Turner*

- ✓ Auto Insurance Reform
- ✓ Long Term Solutions for Roads
- ✓ Education Reform
- ✓ Advocate for Part Time Legislature

*A Representative for the People  
not the Lansing Lobbyists*

## Vote Change Vote Chase





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

June 5, 2018

Chase Turner  
21320 Woodland Glen Drive  
Apartment 101  
Northville, MI 48167

Re: *Staudt v. Turner*  
Campaign Finance Complaint  
No. 2018-05-014-47

Dear Mr. Turner:

The Department of State (Department) has received a complaint alleging that you have violated MCL 169.247 of the Michigan Campaign Finance Act (MCFA) by failing to include a complete and correct identification statement on certain campaign-related materials.

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

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.*

There are two pieces of campaign materials that have been provided which appear to violate MCL 169.247. The first is literature that was distributed to voters, and the second is your campaign website. In support of the complaint, copies of the materials were provided, and have been enclosed with this communication.

Upon review, it appears that the paid for by statement is omitted entirely from the mailing and your website does not contain a proper committee address following the paid for by statement both in violation of MCL 169.247. 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**

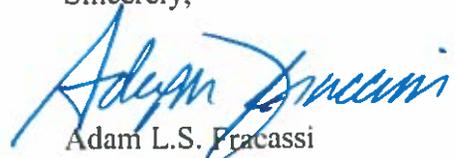
Chase Turner  
June 5, 2018  
Page 2

**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. If this information has been included on your website or campaign flyers, please provide this office evidence demonstrating the proper paid for by statements.

Please be advised that this notice has served to remind you of your obligation under the Act to identify your printed matter and may be used in future proceedings as evidence that tends to establish a knowing violation of the Act. A knowing violation is a misdemeanor offense and may merit referral to the Attorney General for enforcement action. MCL 169.247(6), 215(10).

The Department considers the instant action closed and resolved.

Sincerely,



Adam L.S. Fracassi  
Bureau of Elections  
Michigan Department of State

c: David Staudt

RECEIVED FILED  
MAY 25 2016 AM 7:57  
MICHIGAN DEPARTMENT OF STATE

**Campaign Finance Complaint Form**  
**Michigan Department 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.*). 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 <i>David Staudt</i>	Daytime Telephone Number <i>248-561-5055</i>	
Mailing Address <i>43155 Main Street Ste 2210E</i>		
City <i>Novi</i>	State <i>MI</i>	Zip <i>48375</i>

Section 2. Alleged Violator		
Name <i>Chase Turner</i>		
Mailing Address <i>21320 Woodland Glen Dr. Apt. 101</i>		
City <i>Northville</i>	State <i>MI</i>	Zip <i>48167</i>

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

Section(s) of the MCFA violated:

*47(1) MCFA 1976 PA 388 MCL 169.247(1)*

Explain how those sections were violated:

- ① Campaign Lit does not include a complete and correct identification statement.
- ② Website does not include a complete and correct identification statement.

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

- ① Actual lit distributed to voter
- ② Copy of website - *chaseturner.org* that includes improper "paid for" statement.



**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

5/16/18  
Date

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

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

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

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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



# VOTE CHANGE - VOTE CHASE 38TH DISTRICT REPUBLICAN AUGUST 7TH, 2018



## WHERE I STAND

- Pro-Life
- Pro-Second Amendment
- Smaller Government & Better Roads
- Less Taxes

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## WHO I AM

- Grandson of Marilyn Turner
- Oakland County Native
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## HOW TO SUPPORT US

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A TRUE CONSERVATIVE REPUBLICAN



# Chase Turner

Strong to Serve

Michigan's 38th House District

[chaseturner.org](http://chaseturner.org)

- ✓ Long-term solutions for roads
- ✓ Common sense no-fault insurance reform
- ✓ Advocate for a part-time legislature
- ✓ Education reform
- ✓ Lower energy costs

**Vote CHANGE Vote CHASE**  
August 7, 2018

043753 98/100+ <> Turner, Deb  
<> 05/14/18