

Campaign Finance Complaint Form
Michigan Department of State

RECEIVED/FILED
MICHIGAN DEPT OF STATE
2018 JUL 11 PM 3:14

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>Shawn Steele</i>	Daytime Telephone Number <i>248-284-3083</i>	
Mailing Address <i>5799 S. Main St. #1851</i>		
City <i>Clarkston</i>	State <i>MI</i>	Zip <i>48347</i>

Section 2. Alleged Violator		
Name <i>Elect Mike Saari For State Senate Committee ID# 518315</i>		
Mailing Address <i>1902 Dawn Ridge Rd</i>		
City <i>Commerce Twp</i>	State <i>MI</i>	Zip <i>48390</i>

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

Section(s) of the MCFA violated: *See attached MCL 169.247*

Explain how those sections were violated:
See attached

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

Campaign Finance Complaint - ELECT MIKE SAARI FOR STATE SENATE - Committee ID# 518315

Section 3

Section of MCFA - MCL 169.247

""(1) Except as otherwise provided in this subsection and subject to subsections (3) and (4), a billboard, placard, poster, pamphlet, or other printed matter having reference to an election, a candidate, or a ballot question, shall bear upon it an identification that contains the name and address of the person paying for the matter.""

Mr. Saari's campaign has placed campaign signs expressly advocating for his election in right of ways and on a banner in front of his address and nearly 1 month later, the campaign has not seemed to make any effort to correct their failure to include an indicator as to who paid for the signs. The signs are single sided, however I have included some images of the reverse/blank sides. In addition, to show the date, a copy of a recent newspaper can be seen in the photos.

Evidence of violation:







SAARI

for Michigan Senate

POSITIVE AND ENCOURAGING

Detroit Free Press

DONALD TRUMP'S FUTURE UNCERTAIN AFTER FIRE

Judge rules against U-M

Detroit Free Press

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Detroit Free Press

BOBLO BOAT'S FUTURE UNCERTAIN AFTER FIRE

Judge rules against U-M



KLINT KESTO

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

RECEIVED
OFFICE OF THE
COMPTROLLER

2018 JUL 12 PM 3:04

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.

RECEIVED SEAL

Please print or type all information.

I allege that the MCFA was violated as follows:

Section 1. Complainant		
Your Name <i>Shawn Steele</i>	Daytime Telephone Number <i>513-289-3083</i>	
Mailing Address <i>5799 S. Main St. #1851</i>		
City <i>Clarkston</i>	State <i>MI</i>	Zip <i>48347</i>

Section 2. Alleged Violator		
Name <i>Elect Mike Saari for State Senate Senate Comm.tee # 518315</i>		
Mailing Address <i>1902 Dawn Ridge Rd</i>		
City <i>Commerce Township</i>	State <i>MI</i>	Zip <i>48390</i>

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

Section(s) of the MCFA violated: *MCL 169.247*

Explain how those sections were violated:
see attached

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

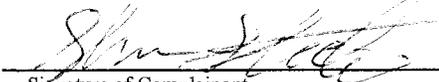
see attached

www.saariformichigansenate2018.com

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

7-10-2018

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

Campaign Finance Complaint - ELECT MIKE SAARI FOR STATE SENATE -
Committee ID# 518315

Section 3

Section of MCFA - MCL 169.247

""(1) Except as otherwise provided in this subsection and subject to subsections (3) and (4), a billboard, placard, poster, pamphlet, or other printed matter having reference to an election, a candidate, or a ballot question, shall bear upon it an identification that contains the name and address of the person paying for the matter.""

Mr. Saari's campaign has been using his website expressly advocating for his election and no where is there any indicator of who paid for this website. There is a mailing address in one location, but it is not the Elect Mike Saari for State Senate Committee's website and no indication of what, if any, committee that address belongs to.

Web Address: www.saariformichigansenate2018.com

Evidence of Violation:

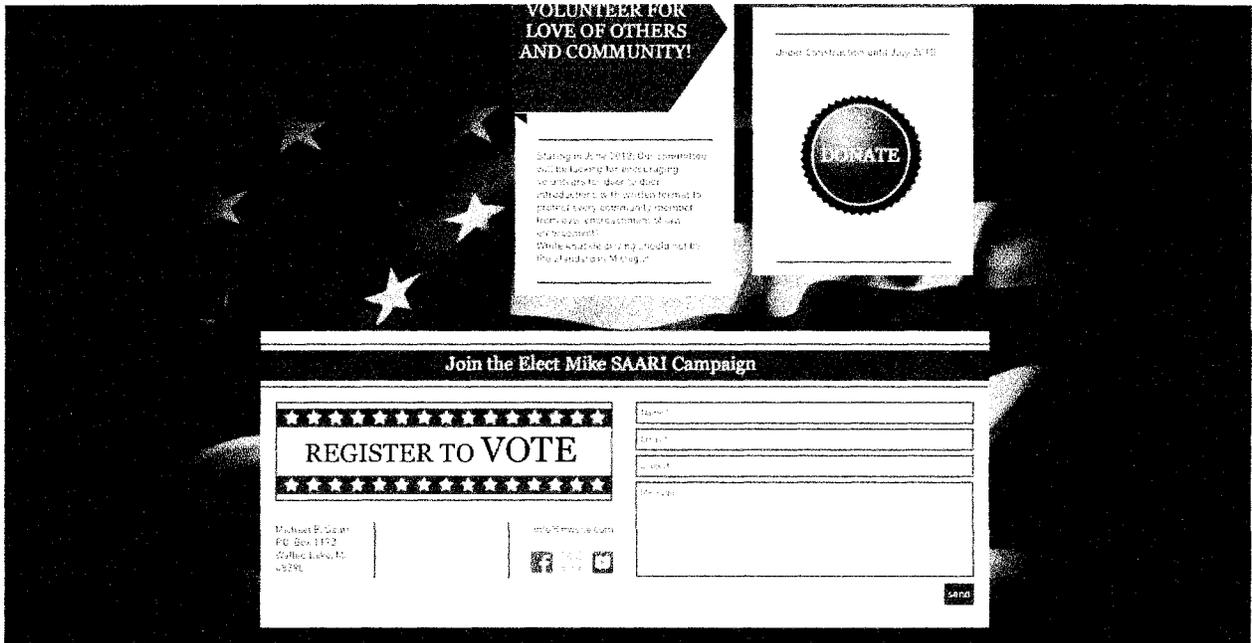
Top of Website



Bottom of Website



Contact information for campaign on Website





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

July 16, 2018

Mike Saari
1902 Dawn Ridge Road
Commerce Township, Michigan 48390

Re: *Steele v. Saari*
Campaign Finance Complaint
No. 2018-07-033-47

Dear Mr. Saari:

The Department of State (Department) has received two formal complaints alleging 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.*

Previously, the Department sent you a formal warning letter regarding a campaign finance complaint alleging your yard signs failed to contain the proper paid for by statement. Since then, the Department has received two additional complaints. The first alleges that your yard signs still do not contain a proper paid for by statement, and the second complaint alleges that your website does not contain a proper paid for by statement.

Upon review, it appears that the paid for by statement is omitted entirely from these campaign materials 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 address of your committee.

David Robertson
July 12, 2018
Page 2

Note that all printed materials that refer to an election or your candidacy produced in the future must include this identification statement. For all materials currently in circulation that refer to your candidacy, the paid for by statement must be corrected/included. This information may be added, e.g. via sticker, sharpie, etc., but it must be included on **all** campaign materials that reference your candidacy or an election.

Please be advised that this is the final notice. This notice serves 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 Fracassi
Bureau of Elections
Michigan Department of State

c: Shawn Steele