



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

July 21, 2017

Sean Green
PO Box 2459
Dearborn, MI 48213

Dear Mr. Green:

The Department of State (Department) received a formal complaint filed by Thomas Choske 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 material. 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). 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).

In support of his complaint, Mr. Choske provided a copy of a business card which states, "Sean Green For Dearborn City Council [.]". There appears to be no paid-for-by statement on the business card. In addition, Mr. Choske also alleges that additional printed material including a door hanger and flyer are also missing the identifier.

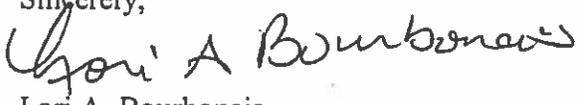
The purpose of this letter is to inform you of the Department's examination of these matters and your right to respond to the allegations before the Department proceeds further. It is important to understand that the Department is neither making this complaint nor accepting the allegations as true.

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.

Sean Green
July 21, 2017
Page 2

A copy of your reply will be provided to Mr. Choske, 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 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,

Lori A. Bourbonais
Bureau of Elections
Michigan Department of State

c: Thomas Choske

Campaign Finance Complaint Form
Michigan Department of State

RECEIVED FILED
MICHIGAN DEPT OF STATE
2017 JUN 14 PM 2:33
ELECTORAL DIVISION

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	Thomas Choske	Daytime Telephone Number (313) 288-2662
Mailing Address	1538 Centre St, Apt 605	
City	State	Zip
Detroit	MI	48226

Section 2. Alleged Violator		
Name	Sean Green	
Mailing Address	PO Box 2459	
City	State	Zip
Dearborn	MI	48213

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

Section(s) of the MCFA violated: 47

Explain how those sections were violated:

No "paid for" disclosure

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

28 separate documents included, each a separate violation

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

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:

2017 JUL 11 PM 2:33
ELECTIONS/COMPLAINTS

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



VISION

My vision for Dearborn is unity. As an independent candidate I want to bring people together and I want everyones voice to be heard. Dearborn is an example of what all American cities should strive to be. It is a melting pot of cultures and a shining example of the American way of life. However, we can, and should do more. My pledge is to give the people a voice, allowing them to be heard. I want to represent our entire city honorably and promote "ONE DEARBORN"; to paraphrase President Lincoln, "of, by and for the people".

CANIDATE

I am a longtime resident of Dearborn that proudly served in the United Staes Navy honably. I was also the Commander of the Dearborn Allied War Veterans Council from 2014 -2016. As Commander I oversaw a multitude of events including the Memorial Day Parade. I also helped design and oversee the construction of the new Dearborns Veterans Park and War Memorial. I currently hold a seat as a Commissioner on the Dearborn Housing Commission. This commission oversees Federal Housing for the city of Dearborns Senior, Disabled, and Section 8 Housing . I am also the Co-Director of a Non-Profit that helps get homeless veterans off the streets .

SEAN GREEN

CANIDATE FOR
DEARBORN CITY COUNCIL





ENDORSED BY

JOHN B. O'REILLY, JR
MAYOR OF DEARBORN

SENATOR MORRIS W. HOOD III
MICHIGAN STATE SENATOR 3RD DISTRICT

- **Veteran of the United States Navy**
- **Commissioner on Dearborn Housing Commission**
- **Commander of Dearborn Allied War Veteran Council for past 2 years**
- **Helped design and oversee the build of the Dearborn's Veteran Park and War Memorial**
- **Co-Director of non profit that helps take homeless veterans off the streets and transition them back into society**



WWW.SEAN4DEARBORN.COM



FOR DEARBORN CITY COUNCIL



SEAN GREEN

VETERAN
NEIGHBOR
FRIEND

VOICE OF THE PEOPLE



**Sean
Green**



For Dearborn City Council

Candidate/Veteran

P.O. Box 2459

Dearborn, MI 48123

forseangreen17@gmail.com

sean4dearborn.com



Sean Green
For
One Dearborn
United We Stand



Sean Green
For Dearborn City Council

Sean Green
P.O. Box 2459
Dearborn, MI 28123
August 7, 2017

Lori A. Bourbonais
Bureau of Elections
Michigan Department of State

RECEIVED/FILED
MICHIGAN DEPT OF STATE
2017 AUG 11 PM 2:54
ELECTIONS/GREAT SEVEN

Dear Lori A. Bourbonais:

First, let me say thank you for accepting my call recently and also please accept my apologies for any inconvenience that this issue has caused you.

As for the complaint, this issue arose from the lack of knowledge of the political process. You see, I am new to the political arena and was uninformed of the rules that required all documents to have term, "paid for by" on all campaign documents. I was even more shocked that that this needs to be placed on items when paid for out of my own pocket. I have since added the term to all documents except for the business cards due to the amount order was of a high number.

Thank you for taking the time to read this and if you want to contact me directly you can reach me on my personal cell at (248) 210-8791. Again, thank you so very much and have a fantastic day.

Sincerely,

Sean Green

Attachment: (2)



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

August 16, 2017

Thomas Choske
1538 Centre St, Apt.605
Detroit, MI 48226

Dear Mr. Choske:

The Department of State received a response to the complaint you filed against Sean Green, 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 that reads "Lori A. Bourbonais".

Lori A. Bourbonais
Bureau of Elections
Michigan Department of State

c: Sean Green



VISION

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SEAN GREEN

CANIDATE FOR
DEARBORN CITY COUNCIL



PAID FOR BY THE COMMITTEE TO ELECT SEAN GREEN

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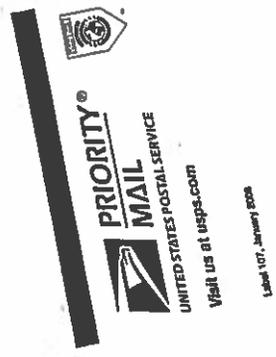
SEAN (CARRER)
P.O. Box 2459
DUNBAR, MI 48123



Lois A. Bourbonais
Bureau of Elections
430 W. Allegan
Lansing, MI 48918

	US POSTAGE PAID \$6.65	Retail
P	Origin: 4824 Destination: 48108 0 LB 130 Oz Aug 07, 17 2524010124-25	1023
PRIORITY MAIL 2-Day		
Expected Delivery Day: 08/09/2017		
USPS TRACKING NUMBER 9505 5108 7477 7219 1102 81		

RECEIVED/FILED
MICHIGAN DEPT OF STATE
2017 AUG 11 PM 2:54
ELECTIONS/GREAT SEAL





ENDORSED BY

JOHN B. O'REILLY, JR
MAYOR OF DEARBORN

SENATOR MORRIS W. HOOD III
MICHIGAN STATE SENATOR 3RD DISTRICT

- Veteran of the United States Navy
- Commissioner on Dearborn Housing Commission
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WWW.SEAN4DEARBORN.COM

FINANCED BY THE COMMITTEE TO ELECT SEAN GREENE

FOR DEARBORN CITY COUNCIL



SEAN GREEN

VETERAN
NEIGHBOR
FRIEND

VOICE OF THE PEOPLE



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

November 3, 2017

Sean Green
P.O. Box 2459
Dearborn, Michigan 48123

Dear Mr. Green:

The Department of State (Department) has completed its investigation of the complaint filed against you by Thomas Choske, which alleged that you violated section 47(1) of the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.247(1), by failing to include a complete and correct identification statement on certain campaign-related material. This letter concerns the disposition of Mr. Choske's complaint.

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), 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.

Mr. Choske filed his complaint on July 14, 2017, and you filed a written response on August 11, 2017.

Mr. Choske alleged that you failed to include a paid-for-by statement on your campaign materials. In support of his complaint, Mr. Choske provided a business card which stated, "Sean Green For Dearborn City Council [.]" a door hanger which stated, "FOR DEARBORN CITY COUNCIL . . . SEAN GREEN [.]" and a flyer which stated, "SEAN GREEN CANDIDATE FOR DEARBORN CITY COUNCIL [.]" None of these materials appeared to contain a paid-for-by statement.

In your response you stated that while you were originally unaware of the identification requirement, you have now added "PAID FOR BY THE COMMITTEE TO ELECT SEAN GREEN" on your flyers and door hangers. Please note that in the future, the identification statement must also include the address of the person paying for the material.

While the Department believes that the evidence tends to show that your campaign material failed to contain a complete and correct paid-for-by statement, section 15(10) of the MCFA

Sean Green
November 3, 2017
Page 2

requires the Department to “endeavor to correct the violation or prevent a further violation by using informal methods such as a conference, conciliation, or persuasion [.]”

The Department is advising you that section 47(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 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 now considers this matter closed and will take no further action against you at this time.

Sincerely,



Lori A. Bourbonais
Bureau of Elections
Michigan Department of State

c: Thomas Choske