January 24, 2017

Dear Mr. Taylor:

The Department of State (Department) received a formal complaint filed by Zachary Lassiter against your candidate committee, alleging that your committee violated the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.201 et seq. The investigation and resolution of this complaint is governed by section 15 of the Act and the corresponding administrative rules, R 169.51 et seq. A copy of the complaint and supporting documentation is enclosed with this letter.

The MCFA prohibits a candidate committee from making a “contribution to or an independent expenditure in behalf of another candidate committee.” MCL 169.244(2). A knowing violation of section 44 is a misdemeanor punishable by a fine, imprisonment, or both. MCL 169.244(5).

Mr. Lassiter alleges that your candidate committee paid for a mailer which endorsed Stephanie Moore for Kalamazoo County Commissioner.

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, 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 answer will be provided to Mr. Lassiter, 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 penalties provided in section 44(5) 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: Zachary Lassiter
In The Matter of:)
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Before The
Michigan Department of State
Bureau of Elections
Lansing, MI
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In the Matter of FRIENDS OF JOHN TAYLOR

Michigan Campaign Finance Law.

ALLEGATIONS

5. FRIENDS OF JOHN TAYLOR made a campaign contribution or independent expenditure supporting FRIENDS OF STEPHANIE MOORE in violation of Section 44 of the Michigan Campaign Finance Act.

STATEMENTS OF FACT

6. FRIENDS OF JOHN TAYLOR paid for campaign literature to be printed and mailed to voters in the Kalamazoo County area that encouraged voters to vote for STEPHANIE MOORE. SEE EXHIBIT 1

7. On the front side of the campaign literature is a photograph of JOHN TAYLOR and STEPHANIE MOORE with the words “We’ve got your back” and the campaign logos for both MOORE and TAYLOR’s campaign.

8. On the back side of the campaign literature are the words “Vote for dedicated community leader!” and again the logos of MOORE and TAYLOR’s campaign’s as well as a list of reasons to vote for MOORE and TAYLOR.

9. The back side of the campaign literature contains the disclaimer of “Paid for by Friends of John Taylor 3573 Kenbrooke Ct Kalamazoo MI 49006”

10. A substantial portion of the literature in question advocates for the election of STEPHANIE MOORE to office with the full front side and half of the back side advocating for her election.

11. The campaign literature is either an independent expenditure of money or a campaign contribution by FRIENDS OF JOHN TAYLOR in support of STEPHANIE MOORE and her committee FRIENDS OF STEPHANIE MOORE. Both are violations of Section 44 of the Michigan Campaign Finance Act.
CERTIFICATION

I certify that to the best of my knowledge, information, and belief, formed after a reasonable inquiry under the circumstances, each factual contention of the complaint is supported by evidence.

Zachary Lassiter, Complainant

Nov 10th 2016
In the Matter of FRIENDS OF JOHN TAYLOR

EXHIBIT 1
FRONT

We've got your back.

STEFANIE MOORE
KALAMAZOO COUNTY COMM DR

BACK

VOTE FOR DEDICATED COMMUNITY LEADERS!

SELECT JOHN TAYLOR
KALAMAZOO COUNTY COMMISSIONER
Protect your right to vote.

STEFANIE MOORE
KALAMAZOO COUNTY COMMISSIONER

WORKING FOR HOUSING INEQUALITY
Provided numerous housing and wrap-around services to over 500 families in Kalamazoo County. Every child has an opportunity to learn in our public schools.

WORKING FOR A SMALLER CARBON FOOTPRINT
Established Kalamazoo County as a PACE District and business can borrow at very low interest energy efficient capital improvements.

WORKING FOR FISCAL RESPONSIBILITY
Sustained Kalamazoo County’s A+ credit rating, making it one of the most financially stable public entities in the state with a general fund balance of $116 million.

ZACHARY LANSBURY
PO BOX 1064
KALAMAZOO MI 49001-1064
March 30, 2017

Zachary Lassiter
P.O. Box 51644
Kalamazoo, Michigan 49005

Dear Mr. Lassiter:

The Department of State received a response to the complaint you filed against John Taylor, 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,

Lori A. Bourbonais
Bureau of Elections
Michigan Department of State

c: John Taylor
January 24, 2017

John Taylor
Friends of John Taylor
3573 Kennbroke Court
Kalamazoo, Michigan 49006

Dear Mr. Taylor:

The Department of State (Department) received a formal complaint filed by Zachary Lassiter against your candidate committee, alleging that your committee violated the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.201 et seq. The investigation and resolution of this complaint is governed by section 15 of the Act and the corresponding administrative rules, R 169.51 et seq. A copy of the complaint and supporting documentation is enclosed with this letter.

The MCFA prohibits a candidate committee from making a “contribution to or an independent expenditure in behalf of another candidate committee.” MCL 169.244(2). A knowing violation of section 44 is a misdemeanor punishable by a fine, imprisonment, or both. MCL 169.244(5).

Mr. Lassiter alleges that your candidate committee paid for a mailer which endorsed Stephanie Moore for Kalamazoo County Commissioner.

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, 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 answer will be provided to Mr. Lassiter, 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 penalties provided in section 44(5) 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: Zachary Lassiter
Before The
Michigan Department of State
Bureau of Elections
Lansing, MI

In The Matter of:

Friends of John Taylor
Committee ID 54943
3573 Kennbroke Court
Kalamazoo MI 49006
Violator

(269)389-0176
PO BOX 51644
Kalamazoo, MI 49005
Complainant

COMPLAINT FOR VIOLATION OF
SECTION 44 OF THE MICHIGAN
CAMPAIGN FINANCE ACT

JURISDICTION

1. JOHN TAYLOR Currently at the time of the violation served on the
   Kalamazoo County Board of Commissioners an elected office and was
   seeking the elected office of Kalamazoo County Clerk. TAYLOR is
   therefore considered a candidate under the Michigan Campaign
   Finance Law.

2. TAYLOR established the committee FRIENDS OF JOHN TAYLOR to
   support his candidacy for the Kalamazoo County Clerk position and
   therefore is a candidate committee under Michigan Campaign
   Finance Law.

3. STEPHANIE MOORE at the time of the violation served on the
   Kalamazoo County Board of Commissioners an elected office and she
   was seeking re-election to that office. MOORE is therefore
   considered a candidate under the Michigan Campaign Finance Law.

4. MOORE established the committee FRIENDS OF STEPHANIE MOORE to
   support her candidacy for the Kalamazoo County Board of
   Commissioners and is therefore a candidate committee under
In the Matter of FRIENDS OF JOHN TAYLOR

Michigan Campaign Finance Law.

ALLEGATIONS

5. FRIENDS OF JOHN TAYLOR made a campaign contribution or independent expenditure supporting FRIENDS OF STEPHANIE MOORE in violation of Section 44 of the Michigan Campaign Finance Act.

STATEMENTS OF FACT

6. FRIENDS OF JOHN TAYLOR paid for campaign literature to be printed and mailed to voters in the Kalamazoo County area that encouraged voters to vote for STEPHANIE MOORE. SEE EXHIBIT 1

7. On the front side of the campaign literature is a photograph of JOHN TAYLOR and STEPHANIE MOORE with the words "We’ve got your back" and the campaign logos for both MOORE and TAYLOR’s campaign.

8. On the back side of the campaign literature are the words "Vote for dedicated community leader!" and again the logos of MOORE and TAYLOR’s campaign’s as well as a list of reasons to vote for MOORE and TAYLOR.

9. The back side of the campaign literature contains the disclaimer of "Paid for by Friends of John Taylor 3573 Kenbrooke Ct Kalamazoo MI 49006"

10. A substantial portion of the literature in question advocates for the election of STEPHANIE MOORE to office with the full front side and half of the back side advocating for her election.

11. The campaign literature is either an independent expenditure of money or a campaign contribution by FRIENDS OF JOHN TAYLOR in support of STEPHANIE MOORE and her committee FRIENDS OF STEPHANIE MOORE. Both are violations of Section 44 of the Michigan Campaign Finance Act.
In the Matter of FRIENDS OF JOHN TAYLOR

CERTIFICATION

I certify that to the best of my knowledge, information, and belief, formed after a reasonable inquiry under the circumstances, each factual contention of the complaint is supported by evidence.

Zachary Lassiter, Complainant

Nov 10th 2016
In the Matter of FRIENDS OF JOHN TAYLOR

EXHIBIT 1
FRONT

We've got your back.

STEPHANIE
MOORE
KALAMAZOO COUNTY COMM. SHERIFF

John TAYLOR
KALAMAZOO COUNTY CLERK
Protect your right to vote.

BACK

VOTE FOR DEDICATED COMMUNITY LEADERS!

STEPHANIE
MOORE
KALAMAZOO COUNTY COMM. SHERIFF

John TAYLOR
KALAMAZOO COUNTY CLERK
Protect your right to vote.

PAYMENT FOR HOUSING EQUITY
Payment of current rent on low income and elderly services
VOTED 320 families in Kalamazoo County on an opportunity to learn more about housing.

WORKING FOR A SMALLER CARBON FOOTPRINT!
Establishing Kalamazoo County's first PACE District, a business that can borrow at rates equal or energy-efficient capital improvements.

WORKING FOR FISCAL RESPONSIBILITY!
Improved Kalamazoo County's AA+ credit rating

ZACHARY LASSITER
PO BOX 3144
KALAMAZOO MI 49003-1644
After reviewing Mr. Sasser's complaint and going through old campaign material I regretfully agree that a violation did occur. It was during the last week of the campaign and the original intent was for Mrs. Moore to contribute 50% of the cost for the mail piece. My campaign manager made an executive decision which I was unaware however take full responsibility for. I apologize and will make sure do the best of my abilities it does not happen in the future.

John Taylor

P.S. I do not endorse Stephanie Moore for any elected position.
John Taylor  
Friends of John Taylor  
3573 Kennbroke Court  
Kalamazoo, Michigan 49006

Dear Mr. Taylor:

The Department of State (Department) has completed its initial investigation of the complaint filed against you by Zachary Lassiter, which alleged that you violated the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.201 et seq. This letter concerns the disposition of the complaint.

The MCFA prohibits a candidate committee from making a “contribution to or an independent expenditure in behalf of another candidate committee.” MCL 169.244(2). A knowing violation of section 44 is a misdemeanor punishable by a fine, imprisonment, or both. MCL 169.244(5).

The Act further 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. Lassiter filed his complaint on November 23, 2016, and you filed an answer on February 22, 2017. Mr. Lassiter did not file a rebuttal statement with the Department.

Mr. Lassiter alleged that your candidate committee “paid for campaign literature … that encouraged voters to vote for” Stephanie Moore. In support of his complaint, Mr. Lassiter provided a copy of a mailer which stated, “VOTE FOR DEDICATED COMMUNITY LEADERS! ELECT JOHN TAYLOR [.] RE-ELECT STEPHANIE MOORE [.]” The mailer indicated that it was paid for by the Friends of John Taylor committee.

In your answer you stated that the original intent was for Ms. Moore’s committee to pay for her proportionate share of the mailer, but this payment was never made.

The Act expressly prohibits one candidate committee from making a contribution to or an independent expenditure for another candidate committee. MCL 169.244(2). The words “contribution” and “expenditure” are terms of art that are generally defined to include a payment or transfer of anything of ascertainable monetary value made for the purpose of influencing or made in assistance of the nomination or election of a candidate. MCL 169.204(1), 169.206(1).
By urging readers to vote for Ms. Moore on the mailer and paying for the production and mailing of those mailers, your committee made a payment for the purpose of influencing Ms. Moore’s nomination or election.

Because the mailer paid for by your candidate committee expressly urged readers to vote for Ms. Moore, the Department finds that the evidence supports a reason to believe that a violation of the Act has occurred.

The Department is mandated by the MCFA to “correct the violation or prevent a further violation” by informal methods if it finds that a violation occurred. MCL 169.215(10). To further this objective, please provide the Department with invoices, receipts, proofs of payment, or any other record maintained by you or your committee that reflects your committee’s total charges and payments for these mailers. Please include costs for design, production, and distribution, along with any other cost incurred with regard to this mailer.

Please provide this material to the Department on or before July 28, 2017. After its review of the information, the Department will then determine how to proceed. Please note that if the Department is unable to resolve this matter informally, the Act requires the Department to refer the matter to the Attorney General for other enforcement action. MCL 169.244(5), MCL 169.215(10)(a).

Sincerely,

[Signature]
Lori A. Bourbonais
Bureau of Elections
Michigan Department of State
John Taylor
Friends of John Taylor
3573 Kennbroke Court
Kalamazoo, Michigan 49006

Via Certified Mail

SECOND REQUEST

Dear Mr. Taylor:

The Department of State (Department) informed you via letter dated July 6, 2017 (enclosed for your convenience) that it had completed its initial investigation of the complaint filed against you by Zachary Lassiter, which alleged that you violated the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.201 et seq.

The MCFA prohibits a candidate committee from making a “contribution to or an independent expenditure in behalf of another candidate committee.” MCL 169.244(2). A knowing violation of section 44 is a misdemeanor punishable by a fine, imprisonment, or both. MCL 169.244(5).

The Act further 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.

In its July 6, 2017 letter, the Department informed you that the evidence provided supported a reason to believe that you had violated section 44 of the Act by paying for a mailer that expressly urged readers to vote for Stephanie Moore. The Department then asked you to provide the following:

[I]nvoices, receipts, proofs of payment, or any other record maintained you or your committee that reflects your committee’s total charges and payments for these mailers.
Please include costs for design, production, and distribution, along with any other cost incurred with regard to this mailer.

The Department asked that you provide this material on or before July 28, 2017 so that it may determine how to proceed. However, as of this date, the Department has not received a response from you.
The Department now requests that you provide this information to the Department no later than September 22, 2017. After its review of the information, the Department will determine how to proceed.

Please note that if the Department is unable to resolve this matter informally, the Department is required to refer the matter to the Attorney General for enforcement of the criminal penalty. MCL 169.244(5), MCL 169.215(10)(a).

Sincerely,

[Signature]

Lori A. Bourbonais
Bureau of Elections
Michigan Department of State
John Taylor
Friends of John Taylor
3573 Kennbroke Court
Kalamazoo, Michigan 49006

Dear Mr. Taylor:

The Department of State (Department) has completed its initial investigation of the complaint filed against you by Zachary Lassiter, which alleged that you violated the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.201 et seq. This letter concerns the disposition of the complaint.

The MCFA prohibits a candidate committee from making a “contribution to or an independent expenditure in behalf of another candidate committee.” MCL 169.244(2). A knowing violation of section 44 is a misdemeanor punishable by a fine, imprisonment, or both. MCL 169.244(5).

The Act further 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. Lassiter filed his complaint on November 23, 2016, and you filed an answer on February 22, 2017. Mr. Lassiter did not file a rebuttal statement with the Department.

Mr. Lassiter alleged that your candidate committee “paid for campaign literature ... that encouraged voters to vote for” Stephanie Moore. In support of his complaint, Mr. Lassiter provided a copy of a mailer which stated, “VOTE FOR DEDICATED COMMUNITY LEADERS! ELECT JOHN TAYLOR. RE-ELECT STEPHANIE MOORE.” The mailer indicated that it was paid for by the Friends of John Taylor committee.

In your answer you stated that the original intent was for Ms. Moore’s committee to pay for her proportionate share of the mailer, but this payment was never made.

The Act expressly prohibits one candidate committee from making a contribution to or an independent expenditure for another candidate committee. MCL 169.244(2). The words “contribution” and “expenditure” are terms of art that are generally defined to include a payment or transfer of anything of ascertainable monetary value made for the purpose of influencing or made in assistance of the nomination or election of a candidate. MCL 169.204(1), 169.206(1).
By urging readers to vote for Ms. Moore on the mailer and paying for the production and mailing of those mailers, your committee made a payment for the purpose of influencing Ms. Moore’s nomination or election.

Because the mailer paid for by your candidate committee expressly urged readers to vote for Ms. Moore, the Department finds that the evidence supports a reason to believe that a violation of the Act has occurred.

The Department is mandated by the MCFA to “correct the violation or prevent a further violation” by informal methods if it finds that a violation occurred. MCL 169.215(10). To further this objective, please provide the Department with invoices, receipts, proofs of payment, or any other record maintained you or your committee that reflects your committee’s total charges and payments for these mailers. Please include costs for design, production, and distribution, along with any other cost incurred with regard to this mailer.

Please provide this material to the Department on or before July 28, 2017. After its review of the information, the Department will then determine how to proceed. Please note that if the Department is unable to resolve this matter informally, the Act requires the Department to refer the matter to the Attorney General for other enforcement action. MCL 169.244(5), MCL 169.215(10)(a).

Sincerely,

[Signature]

Lori A. Bourbonais
Bureau of Elections
Michigan Department of State
<table>
<thead>
<tr>
<th>Expenditure #1</th>
<th>Name</th>
<th>Address</th>
<th>Purpose</th>
<th>Date</th>
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<td>Vantiv, LLC</td>
<td>8500 Governors Hill Dr. Symmes Township OH 45249</td>
<td>Credit Card Processing Fees</td>
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<td>Heather Ricketts</td>
<td>2600 Hunters Pt Kalamazoo MI 49048</td>
<td>Lunchon Womans Equality</td>
<td>08/26/16</td>
<td>$ 75</td>
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<td>Expenditure #3</td>
<td>Stephanie Williams</td>
<td>3421 Kenbrooke Ct Kalamazoo MI 49006</td>
<td>Staff Payment</td>
<td>09/01/16</td>
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<td>Expenditure #4</td>
<td>Nora Gimple</td>
<td>1539 Kickapoo Ct Kalamazoo MI 49006</td>
<td>Staff Payment</td>
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<td>Expenditure #5</td>
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<td>3629 Kenbrooke Ct Kalamazoo MI 49006</td>
<td>Staff Payment</td>
<td>09/01/16</td>
<td>$ 100</td>
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</tbody>
</table>

Subtotal this page $2,026.64

Grand Total of all Schedules 1B

(Complete on last page of Schedule)
After reviewing my records, the total cost for the joint mail piece is $1588.55. This includes postage and design.

[Signature]

[Date]
SECOND REQUEST

Dear Mr. Taylor:

The Department of State (Department) informed you via letter dated July 6, 2017 (enclosed for your convenience) that it had completed its initial investigation of the complaint filed against you by Zachary Lassiter, which alleged that you violated the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.201 et seq.

The MCFA prohibits a candidate committee from making a “contribution to or an independent expenditure in behalf of another candidate committee.” MCL 169.244(2). A knowing violation of section 44 is a misdemeanor punishable by a fine, imprisonment, or both. MCL 169.244(5).

The Act further 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.

In its July 6, 2017 letter, the Department informed you that the evidence provided supported a reason to believe that you had violated section 44 of the Act by paying for a mailer that expressly urged readers to vote for Stephanie Moore. The Department then asked you to provide the following:

- Invoices, receipts, proofs of payment, or any other record maintained you or your committee that reflects your committee’s total charges and payments for these mailers. Please include costs for design, production, and distribution, along with any other cost incurred with regard to this mailer.

The Department asked that you provide this material on or before July 28, 2017 so that it may determine how to proceed. However, as of this date, the Department has not received a response from you.
## Invoice

**Date:** November 3, 2016  
**Terms:** Net 15  
**Client:** Friends of John Taylor  
3573 Kenbrooke Court  
Kalamazoo, MI  49006

### Project(s)
- 1 Location Photography  
- 2 Printed campaign materials

<table>
<thead>
<tr>
<th>Task Description</th>
<th>Hours/Quantity</th>
<th>Rate</th>
<th>Totals</th>
</tr>
</thead>
<tbody>
<tr>
<td>8-30 Photography</td>
<td>4.5 hrs</td>
<td>$50</td>
<td>225.00</td>
</tr>
<tr>
<td>Location shooting, digital photo editing, color correction, retouching, and file output</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9-11 Photography</td>
<td>2.25 hrs</td>
<td>$50</td>
<td>112.50</td>
</tr>
<tr>
<td>(Hoadley)*</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Locations shooting, digital photo editing, and file output</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9-14 Photography</td>
<td>3 hrs</td>
<td>$50</td>
<td>150.00</td>
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<tr>
<td>(Crowells)</td>
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<td></td>
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<tr>
<td>Lighting, location shooting, digital photo editing, color correction, and file output</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10-14 Photography</td>
<td>2 hrs</td>
<td>$50</td>
<td>100.00</td>
</tr>
<tr>
<td>(Moore)*</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Location shooting, digital photo editing, and file output</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Logo Modifications</td>
<td>2.5 hrs</td>
<td>$50</td>
<td>225.00</td>
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<tr>
<td>Alterations to original vector art from state senate identity</td>
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<tr>
<td>Intro Card</td>
<td>5.75 hrs</td>
<td>$50</td>
<td>287.50</td>
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<td>Layout and design, typesetting, digital copy editing/writing, and file output</td>
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<td>Bipartisan Card</td>
<td>4.25 hrs</td>
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<tr>
<td>Reminder Card</td>
<td>2.25 hrs</td>
<td>$50</td>
<td>112.50</td>
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<td>Layout and design, typesetting, digital image manipulation, copy writing, and file output</td>
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<tr>
<td>Moore Card</td>
<td>2.0 hrs</td>
<td>$50</td>
<td>100.00</td>
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<tr>
<td>Layout and design, typesetting, copy editing, and file output</td>
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</table>

**Campaign Contribution:** $-600.00

**Total Due:** $925.00

*Please make checks payable to: Martin Burch*
## ITEMIZED EXPENDITURES
### SCHEDULE 1B
### CANDIDATE COMMITTEE

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<thead>
<tr>
<th>Expenditure #</th>
<th>Name</th>
<th>Address</th>
<th>Purpose</th>
<th>Date</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>#1</td>
<td>Citizens for Jeff Getting</td>
<td>5176 ATWATER COURT Kalamazoo MI 49009</td>
<td>fund raiser ticket</td>
<td>10/24/16</td>
<td>$38</td>
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<tr>
<td>#2</td>
<td>Meijer</td>
<td>119 W Main St Kalamazoo MI 49009</td>
<td>Mailing Labels</td>
<td>11/01/16</td>
<td>$123.98</td>
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<td>#3</td>
<td>Stephanie Williams</td>
<td>3421 Kenbrooke Ct Kalamazoo MI 49006</td>
<td>Postage - reimbursement</td>
<td>11/15/16</td>
<td>$470</td>
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<td>#4</td>
<td>Facebook</td>
<td>1 Hacker Way Menlo Park CA 94025</td>
<td>Adverts</td>
<td>11/05/16</td>
<td>$50</td>
</tr>
<tr>
<td>#5</td>
<td>RJ's Printing</td>
<td>1001 Second St Kalamazoo MI 49001</td>
<td>Printing</td>
<td>11/03/16</td>
<td>$1388.55</td>
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Subtotal this page $2,070.53

Grand Total of all Schedules 1B (Complete on last page of Schedule)

Enter this total on line 8a of Summary Page
<table>
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<tr>
<th>Quantity</th>
<th>Item Code</th>
<th>Description</th>
<th>Price Each</th>
<th>Amount</th>
</tr>
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<tbody>
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<td>2,500</td>
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<td>Post Cards 5.5 x 8.5 Full Color 2-Sided</td>
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<td>2,479</td>
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<td></td>
<td>SALES TAX</td>
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<td>78.50</td>
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Total $1,388.55

Thank you for your business.
FROM: John Taylor
1914 Forrest Dr.
Portage MI 49002

TO: Bureau of Elections
430 W. Allegan
Lansing MI 48918

Expected Delivery Day: 09/20/2017

VISIT US AT USPS.COM®
ORDER FREE SUPPLIES ONLINE

United States Postal Service®
The Department of State (Department) has concluded its investigation of the complaint filed by Zachary Lassiter against you, which alleged that you violated the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.201 et seq. This letter concerns the disposition of Mr. Lassiter’s complaint, which was filed on November 23, 2016. You filed an answer to the complaint on February 22, 2017. Mr. Lassiter did not file a rebuttal statement.

Mr. Lassiter alleged that your candidate committee paid for a mailer which endorsed Stephanie Moore for Kalamazoo County Commissioner.

The MCFA prohibits a candidate committee from making a “contribution to or an independent expenditure in behalf of another candidate committee.” MCL 169.244(2).

By letters dated July 6, 2017 and September 6, 2017, the Department notified you if its determination that the evidence provided supported a reason to believe that a violation of the Act had occurred. The Department requested that you provide the Department with invoices, receipts, proofs of payment, or any other record maintained by you or your committee that reflected the committee’s total charges and payments for these mailers. The Department asked you to include costs for design, production, and distribution, along with any other cost incurred with regard to the mailer.

You provided this information to the Department September 22, 2017. After careful review of the records submitted, the Department finds that the evidence supports a conclusion that your committee spent $1,588.55 on the mailer.
After reviewing the mailer, the Department finds the mailer equally contained information for voters that was intended to further your own election and information for voters that was intended to further the election of Ms. Moore. The portion of the expenditure to further Ms. Moore’s election was made in contravention of the Act. Because the Department has determined 1/2 of the flyer contained information that was impermissibly paid for by your committee, the Department considers 1/2 of the $1,588.55, or $794.27, to be the total amount of the improper expenditure made in behalf of Ms. Moore’s candidate committee.

Having made these determinations, the Department must now “endeavor to correct the violation or prevent a further violation by using informal methods.” MCL 169.215(10). The Department offers to resolve Mr. Lassiter’s complaint against you informally through execution of the enclosed conciliation agreement, which requires you to attempt to recover $794.27 from Ms. Moore’s committee and to pay a civil fine in the amount of $794.27. If you wish to enter into the conciliation agreement, please return the original signed document to P.O. Box 20126, Lansing, Michigan 48901-0726, along with payment in full of the $794.27 fine, on or before November 3, 2017. Payment must be made by check or money order payable to the State of Michigan; please include the notation, “Conciliation Agreement, Attn: Bureau of Elections” on the check or money order. A copy of the conciliation agreement signed by the Secretary of State’s authorized representative will be returned to you promptly.

Please be advised that if the Department is unable to resolve Mr. Lassiter’s complaint informally, it is required by MCL 169.215(10)-(11) to:

1) Refer the matter to the Attorney General with a request that his office prosecute it for the crime of a candidate committee making a contribution to or independent expenditure in behalf of another candidate committee, a misdemeanor violation of MCL 169.244(2); and/or

2) Conduct an administrative hearing to enforce the civil penalty provided in MCL 169.215(11), which provides that the Secretary of State may seek a civil fine up to triple the amount of the improper contribution or expenditure plus up to $1,000.00 per violation.

Sincerely,

Lori A. Bourbonais
Bureau of Elections
Michigan Department of State

Enclosure
In the Matter of:

John Taylor
Friends of John Taylor
1914 Forest Drive
Portage, Michigan 49002

CONCILIATION AGREEMENT

Pursuant to MCL §169.215(10) of the Michigan Campaign Finance Act (the Act), MCL §169.201 et seq., the Secretary of State and John Taylor (Respondent) hereby enter into a conciliation agreement with respect to certain acts, omissions, methods, or practices prohibited by the Act.

The Secretary of State alleges that there may be reason to believe that Respondent violated MCL §169.244(2) by making improper expenditures from his candidate committee in the amount of $794.27 in behalf of Stephanie Moore.

Therefore, Respondent, without admitting any issue of law or fact, except as stated herein, hereby voluntarily enters into this conciliation agreement and assures the Secretary of State that he will comply with the Act and the Rules promulgated to implement the Act.

By executing this conciliation agreement, Respondent certifies that he has (1) attempted to recover $794.27 from the candidate committee of Stephanie Moore, and (2) paid in full a $794.27 fine by check or money order payable to the State of Michigan.

The Secretary of State and Respondent further agree that this agreement is in effect and enforceable for four years from the date it is signed by the Secretary of State or her duly authorized representative.
The Secretary of State and Respondent further agree that this agreement, unless violated, shall constitute a complete bar to any further action by the Secretary of State with respect to the alleged violation that resulted in the execution of this agreement.

The Secretary of State and Respondent further agree that the complaint and investigation that resulted in this agreement are disposed of and will not be the basis for further proceedings, except pursuant to this agreement.

The Secretary of State and Respondent further agree that this agreement will not prevent the Secretary of State from taking action for violations of this agreement.

The Secretary of State and Respondent further agree that Respondent's performance under this agreement shall be given due consideration in any subsequent proceedings.

The Secretary of State and Respondent further agree that this agreement, when signed, shall become a part of the permanent public records of the Department of State.

The Secretary of State and Respondent finally agree that the signatories below are authorized to enter into and bind the parties to this agreement, and have done so by signing this agreement on the date below.

RUTH JOHNSON
SECRETARY OF STATE

RESPONDENT

Sally Williams, Director
Bureau of Elections

John Taylor

Date: ____________________________ Date: ____________________________
PAY TO THE ORDER OF:  State of Michigan  $794.27

Seven Hundred Ninety Four $794.27 DOLLARS

HONOR CREDIT UNION
8395 Edgewood Road - Battle Creek, MI 49017-1412
(269) 963-3525 - www.honorcu.com

Acceptance Agreement
Attorn of Elections
CONCILIATION AGREEMENT

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RUTH JOHNSON
SECRETARY OF STATE

Sally Williams, Director
Bureau of Elections

Date: 11/13/17

RESPONDENT

John Taylor

Date: 10/20/2017
November 15, 2017

Zachary Lassiter
P.O. Box 51644
Kalamazoo, Michigan 49005

Dear Mr. Lassiter:

The Department of State has concluded its investigation of the complaint that you filed against the John Taylor, which concerned an alleged violation of the Michigan Campaign Finance Act (MCFA), 1976 P.A. 388, MCL 169.201 et seq. A copy of the final resolution is provided as an enclosure with this letter.

Sincerely,

Lori A. Bourbonais
Bureau of Elections
Michigan Department of State