

STATE OF MICHIGAN
DEPARTMENT OF ATTORNEY GENERAL



P.O. Box 30755
LANSING, MICHIGAN 48909

BILL SCHUETTE
ATTORNEY GENERAL

June 27, 2014

Daniel Krueger
14117 Brooklane
Holland, MI 49424

Janet Koop, Treasurer
"Ruth Johnson for Michigan"
11750 Eagle Road
Davisburg, MI 48350

Re: Mark Brewer complaint, February 26, 2014

Dear Mr. Krueger and Ms. Koop:

The Department of Attorney General (Department) has completed its investigation of the complaint filed against you by Mr. Mark Brewer, which alleged a violation of the Michigan Campaign Finance Act (MCFA or ACT), 1976 PA 388, MCL 169.201, *et seq.*¹ The Department has carefully considered all of the written statements and documentary evidence provided by the parties in this matter and issues this warning letter to "endeavor to correct the violation or prevent a further violation by using informal methods such as a conference, conciliation, or persuasion...." MCL 169.215(10).

The MCFA provides that a public body, or an individual acting on its behalf, 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...." 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 169.257(3).

¹ The MCFA provides that if an allegation involves a campaign or committee with which the Secretary of State is connected, directly or indirectly, the Secretary of State shall refer the matter to the Attorney General to determine whether a violation has occurred. MCL 169.215(9).

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. Brewer filed the complaint on February 26, 2014. He alleged that “on February 11, 2014, Ottawa County Clerk Daniel Krueger, on behalf of Secretary of State Ruth Johnson, used his county email account to solicit contributions to the reelection campaign of Johnson.” Mr. Brewer provided a copy of an e-mail dated February 11, 2014, 9:49 p.m., from the Ottawa County e-mail account of Mr. Krueger. The e-mail was sent to numerous individuals and invited them to attend a fund raiser for Secretary of State Ruth Johnson scheduled for March 19, 2014, in Lansing, Michigan.

Mr. Krueger filed his written response on March 18, 2014 and Ms. Koop filed her response on March 24, 2014. Mr. Krueger explained that the e-mail in question was sent from his home using his personal computer. He further stated that he had recently received a computer program from Ottawa County that allowed him to access the county e-mail system from his home. He explained that he was working on county-related e-mails on February 11, 2014 and that he had forgotten that he was still on the county computer system when he sent out the fundraising e-mail. Ms. Koop, replied on behalf of Secretary of State Johnson and the Ruth Johnson for Michigan Committee and stated that she had no prior knowledge of Mr. Krueger’s actions.

An investigation of the allegation was undertaken and has been completed. The investigator interviewed Mr. Krueger, Ms. Koop, and examined Mr. Krueger’s county-owned computer. The investigation concluded that based on Mr. Krueger’s key card data, Mr. Krueger was not in his office on February 11, 2014. It further concluded that Mr. Krueger was engaged in work-related activity using his county e-mail account around the time the fundraising e-mail was sent but that he likely did not use his county-owned computer to send out the e-mail in question. The date that Mr. Krueger received the e-mail software to allow access to the county e-mail system from his home and the associated training further lends credibility to Mr. Krueger’s explanation that the use of the county e-mail system was inadvertent. The investigation concluded based on discussions with the county technology director that the cost to the county for the use of the e-mail system was de minimus. Ms. Koop was interviewed and she denied any prior knowledge of Mr. Krueger’s actions. There is no evidence to suggest that Ms. Koop, Secretary of State Johnson, or anyone acting on their behalf, had prior knowledge of Mr. Krueger’s use of the Ottawa County computer system to solicit contributions for Ms. Johnson. Moreover, the Department has been advised that Mr. Krueger is retiring from his position as Ottawa County Clerk, effective June 27, 2014.

Daniel Krueger
Janet Koop
Page 3
June 27, 2014

After reviewing all the evidence submitted, the Department believes that the evidence tends to show that Mr. Krueger used the county e-mail system, albeit inadvertently, in violation of the Act. The Department does not find any evidence of a violation by Secretary of State Johnson, Ms. Janet Koop, or the Ruth Johnson for Michigan Committee. The Department believes that while the use of the county e-mail system was improper, the violation is mitigated by the fact that the solicitation was not committed on county time, from a county office, or by using a county-owned computer. The cost to the county for using the e-mail system was too minimal to calculate. Finally, although a violation of the Act occurred, the fact that Mr. Krueger will be retiring on June 27, 2014, and will no longer hold public office means that he cannot commit further violations of section 57 of the Act. Therefore, this warning letter is an appropriate resolution to this complaint.²

The Department reminds Mr. Krueger that it is unlawful for a public body, or an individual acting on its behalf, to use or authorize the use of equipment, supplies, personnel, funds, or other public resources to make a contribution or expenditure. This notice may be used in future proceedings as evidence that tends to establish a knowing violation of the Act, should Mr. Krueger hold public office and commit a violation of the MCFA in the future. A knowing violation is a misdemeanor offense and may merit a referral for criminal enforcement action. MCL 169.257(3).

The Department now considers this matter closed and will take no further action at this time.

Sincerely,



Robert Ianni
Bureau Chief
Consumer and Environmental
Protection Bureau
517-335-3571

BI/akk

cc: Mr. Mark Brewer
Ms. Ruth Johnson
Mr. William R. Kordenbrock

² This resolution is consistent with the recent resolution of similar complaints. See, In Re Rochau, December 4, 2012; In Re Sittig, April 15, 2013; In re Banaszak, February 25, 2014; and In Re Woods, February 27, 2014.

March 31, 2014

Robert Ianni, Esq.
Bureau Chief
Michigan Department of Attorney General
525 West Ottawa Street
Lansing, MI 48909

* GERALD H. ACKER
** BARRY J. GOODMAN
TIM SULOLLI
KEVIN Z. KOMAR
LARRY R. MAITLAND II
BRADLEY M. PERI
MARK BREWER
JORDAN B. ACKER
JOHNNY A. HAMOOD
CHARLES W. WOJNO
EBONEY R. FUGHES

* ALSO ADMITTED IN DC
** ALSO ADMITTED IN FLORIDA
www.goodmanacker.com

Dear Mr. Ianni,

Thank you for the opportunity to reply to the responses of Daniel Krueger and Ruth Johnson to my complaint.

Mr. Krueger admits to violating the law and his proffered explanation and apology are no defense.

Ms. Johnson denies knowledge of Mr. Krueger's illegal conduct. Her knowledge is irrelevant. It is hornbook law that a principal is responsible for the actions of her agent. Mr. Krueger was acting as the agent of Ms. Johnson here and she cannot escape liability by claiming ignorance of his actions.

Very truly yours,



Mark Brewer

DEPARTMENT OF ATTORNEY GENERAL
APR 04 2014
CONSUMER & ENVIRONMENTAL
PROTECTION BUREAU

STATE OF MICHIGAN
DEPARTMENT OF ATTORNEY GENERAL

mailed 3/25/14 F



P.O. Box 30755
LANSING, MICHIGAN 48909

BILL SCHUETTE
ATTORNEY GENERAL

March 25, 2014

Mr. Mark Brewer
17000 West Ten Mile Road
Southfield, MI 48075

Dear Mr. Brewer:

As you may know, the Department of Attorney General (DAG) is handling your complaint filed against Daniel Krueger and Ruth Johnson alleging a violation of the Michigan Campaign Finance Act (MCFA), 1976 PA 388, MCL 169.201 *et seq.*, under the conflict of interest provision of the act, MCL 169.215(9). The DAG has received the attached responses to your complaint.

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 Michigan Department of Attorney General, 525 W. Ottawa St, Lansing, Michigan 48909, Attention: Robert Ianni.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Ianni", written over a large, stylized, handwritten "X" or similar mark.

Robert Ianni, Bureau Chief
Michigan Department of Attorney General
Consumer & Environmental Protection Bureau

RI/akk
Attachments
c: Daniel Krueger
Janet Koop

DEPARTMENT OF ATTORNEY GENERAL

MAR 18 2014

CONSUMER & ENVIRONMENTAL
PROTECTION BUREAU

DANIEL C. KRUEGER
14117 BROOKLANE
HOLLAND, MI. 49424

Mr. Robert Ianni-Bureau Chief
Department of Attorney General
Consumer & Environmental Protection Bureau
525 W. Ottawa, 6th Floor
Lansing, MI 48909

March 13, 2014

Dear Sir:

I am in receipt of a letter outlining a complaint filed by Mr. Mark Brewer alleging a violation of Michigan Campaign Finance Act, 1976 PA 388, MCL 169.201 et seq. along with accompanying copy of complaint and supporting documentation.

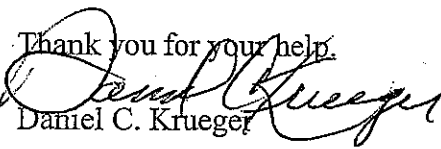
I do not deny the allegations submitted by Mr. Brewer, but offer the following explanation and apology.

As you will note from the heading on the copy of the email submitted by Mr. Brewer as evidence, the email was sent at 9:49pm on the evening of February 11, 2014. I was at home at the time this email was written and was working on several items on my home computer. I had just obtained a program that allowed me to access my work computer through my home computer and had been working on several items, including emails for several hours. At the very end of the evening I remembered I was going to send out the note you have as presented by Mr. Brewer, forgetting I was accessing the work system through my home computer, and inadvertently used the work system to send the copy of the email in question.

Once the issue of the email was brought to my attention, I realized I had made an error in sending it through the process I did. In all honesty, I had forgotten I was on my work system since I was working on my home computer.

Again, I do not deny the allegation, but it was done purely as an error through the circumstances outlined above. I do apologize and await your decision.

Thank you for your help.


Daniel C. Krueger

Janet Koop, Treasurer
Ruth Johnson for Michigan Committee
11750 Eagle Road
Davisburg, MI 48350

March 23, 2014

Mr. Robert Ianni
Bureau Chief
Department of Attorney General
Consumer & Environmental Protection Bureau
525 W. Ottawa
6th Floor
Lansing, MI 48909

Dear Mr. Ianni,

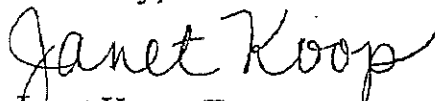
This is a written response in regard to the formal complaint filed with the Department of State by Mark Brewer alleging the Ruth Johnson for Michigan committee violated the Campaign Finance Act (MCFA or ACT).

As treasurer for the Ruth Johnson for Michigan committee, I want to advise you that the committee had no knowledge of Mr. Krueger's alleged actions until the complaint was received.

The alleged activities of Mr. Krueger were done without any knowledge of Ruth Johnson or the Ruth Johnson for Michigan committee.

Please let me know if you have any further questions.

Sincerely,



Janet Koop, Treasurer
Ruth Johnson for Michigan Committee



Janet Koop, Treasurer
Ruth Johnson for Michigan Committee
11750 Eagle Road
Davisburg, MI 48350

March 23, 2014

Mr. Robert Ianni
Bureau Chief
Department of Attorney General
Consumer & Environmental Protection Bureau
525 W. Ottawa
6th Floor
Lansing, MI 48909

Dear Mr. Ianni,

This is a written response in regard to the formal complaint filed with the Department of State by Mark Brewer alleging the Ruth Johnson for Michigan committee violated the Campaign Finance Act (MCFA or ACT).

As treasurer for the Ruth Johnson for Michigan committee, I want to advise you that the committee had no knowledge of Mr. Krueger's alleged actions until the complaint was received.

The alleged activities of Mr. Krueger were done without any knowledge of Ruth Johnson or the Ruth Johnson for Michigan committee.

Please let me know if you have any further questions.

Sincerely,

Janet Koop, Treasurer
Ruth Johnson for Michigan Committee

DANIEL C. KRUEGER
14117 BROOKLANE
HOLLAND, MI. 49424

MAR 18 2014

CONSUMER & ENVIRONMENTAL
PROTECTION BUREAU

Mr. Robert Ianni-Bureau Chief
Department of Attorney General
Consumer & Environmental Protection Bureau
525 W. Ottawa, 6th Floor
Lansing, MI 48909

March 13, 2014

Dear Sir:

I am in receipt of a letter outlining a complaint filed by Mr. Mark Brewer alleging a violation of Michigan Campaign Finance Act ,1976 PA 388, MCL 169.201 et seq. along with accompanying copy of complaint and supporting documentation.

I do not deny the allegations submitted by Mr. Brewer, but offer the following explanation and apology.

As you will note from the heading on the copy of the email submitted by Mr. Brewer as evidence, the email was sent at 9:49pm on the evening of February 11, 2014. I was at home at the time this email was written and was working on several items on my home computer. I had just obtained a program that allowed me to access my work computer through my home computer and had been working on several items, including emails for several hours. At the very end of the evening I remembered I was going to send out the note you have as presented by Mr. Brewer, forgetting I was accessing the work system through my home computer, and inadvertently used the work system to send the copy of the email in question.

Once the issue of the email was brought to my attention, I realized I had made an error in sending it through the process I did. In all honesty, I had forgotten I was on my work system since I was working on my home computer.

Again, I do not deny the allegation, but it was done purely as an error through the circumstances outlined above. I do apologize and await your decision.

Thank you for your help.


Daniel C. Krueger



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

March 3, 2014

Mr. Matthew Schneider
Chief Legal Counsel
Department of Attorney General
G. Mennen Williams Building
525 W. Ottawa
Lansing, MI 48933

RECEIVED

MAR 06 2014

PUBLIC EMPLOYMENT,
ELECTIONS & TORT

Re: Campaign Finance Complaint filed by Mark Brewer

Dear Mr. Schneider:

On February 26, 2014, the Michigan Bureau of Elections received the attached Campaign Finance Complaint from Mr. Mark Brewer. The Campaign Finance Act provides that if an allegation involves a campaign or committee with which the secretary of state is connected, directly or indirectly, the secretary of state shall refer the matter to the attorney general to determine whether a violation of this Act has occurred. MCL 169.215(9).

This matter is being referred to the attorney general for investigation and resolution of this complaint as governed by Section 15 of the MCFA (MCL 169.215).

Should you have any questions, or need any additional information, please contact this office.

Sincerely,

William R. Kordenbrock
Chief Legal Counsel
Legal Services Administration

WRK/mkn
Enclosures
cc: Michigan Bureau of Elections

Michigan Department of State
Campaign Finance Complaint Form

Reset Form

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.*).

Please print or type all information.

I allege that the MCFA was violated as follows:

Section 1: Complainant		
Your Name	Mark Brewer	Daytime Telephone Number
		248-483-5000
Mailing Address		
17000 W. Ten Mile Road		
City	State	Zip
Southfield	MI	48075

Section 2: Alleged Violator		
Name		
Daniel Krueger/Ruth Johnson		
Mailing Address		
12220 Fillmore/430 W. Allegan		
City	State	Zip
Grand Haven/Lansing	MI	49417/48918

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

Section(s) of the MCFA violated: 57

Explain how those sections were violated:

On February 11, 2014 Ottawa County Clerk Daniel Krueger, on behalf of the Secretary of State Ruth Johnson, used his county email account to solicit contributions to the reelection campaign of Johnson.

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

A copy of the text of the email and the invitation is attached.

2014 FEB 26 PM 4:16
BUREAU OF ELECTIONS
MI DEPT OF STATE

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 Mark Bruner February 20, 2014
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:

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

From: DKrueger@miottawa.org [mailto:DKrueger@miottawa.org]
Sent: Tuesday, February 11, 2014 9:49 PM
To: amanary@co.midland.mi.us; anorlander@calhouncountymi.gov;
ariska@co.jackson.mi.us; AWittrock@ingham.org; barnesl@oakgov.com;
bbyrum@ingham.org; benderp@stjosephcountymi.org;
browec@charlevoixcounty.org; brownlr@oakgov.com;
bscheele@grandtraverse.org; carmella.sabaugh@macombgov.org;
cgarrett@co.wayne.mi.us; clerk@cheboygancounty.net;
clerk@co.lake.mi.us; clerk@deltacountymi.org; clerk@missaukee.org;
clerk@roscommoncounty.net; clerk@schoolcraftcounty.us;
clerk@wexfordcounty.org; clerkdolly@dickinsoncountymi.gov;
clk_byrum@ingham.org; cmaleport@chippewacountymi.gov;
countyclerk@gladwinco.com; countyclerk@sanilacounty.net;
cummings@oakgov.com; dbosworth@eatoncounty.org;
dhill@kalkaskacourt.org; dkrueger@miottawa.org;
doden@waynecounty.com; dolney@benzieco.net;
friedrib@alpenacounty.org; gklacking@ogemawcountymi.gov;
gmahar@waynecounty.com; gmartin@emmetcounty.org;
goodreauw@baragacounty.org; gpelissero@gogebic.org;
gratiotcountyclerk@yahoo.com; Grimm, Kim; guys@antrimcounty.org;
jdeboyer@stclaircounty.org; jfeeting@tuscolacounty.org;
jgleason@co.genesee.mi.us; jriffle@masoncounty.net;
jwatts@allegacounty.org; jwinton@oscodacountymi.com;
JLuhtanen@iron.org; kestenbauml@ewashtenaw.org;
keweenawclerk@pasty.net; kim.cady@macombgov.org;
kjbluhm@yahoo.com; kmillard@co.montcalm.mi.us;
Kfarhat@ingham.org; laurie@co.newaygo.mi.us; lbraid@shiwasse.net;
lbrown@gmail.com; learyt@vbco.org; lucoclrk@lighthouse.net;
luczak@baycounty.net; macclerk@lighthouse.net;
mary.hollinrake@kentcountymi.gov; mayfieldp@dareco.net;
mcrocker@co.leelanau.mi.us; mdunleavy@co.livingston.mi.us;
mfroberg@AlgerCourtHouse.com; mkast@co.hillsdale.mi.us;
mkleiman@menomineeco.com; mlux@isabellacounty.org;
monicak@cassco.org; montclerk@i2k.net; mpurcell@co.mecosta.mi.us;
neall@co.huron.mi.us; nhuebel@ioscocoounty.org;
ontclerk@ontonagoncounty.org; p51nowak@manisteecountymi.gov;
pat@houghtoncounty.net; pdishnow@mqtco.org; Pezet, Jeanne;
piclerk@picounty.org; PattiT@alcona-county.net; Pjarvis@barryco.org;
rgriffin@oceana.mi.us; roger.cardamone@macombgov.org;
roxann.holloway@lenawee.mi.us; rrockwell@arenacountygov.com;
sdefeyter@otsegocountymi.gov; sharon_lemasters@monroemi.org;
smoore@crawfordco.org; snedow@co.leelanau.mi.us;
styler@berriencounty.org; trich@ioniacounty.org;
tspencer@lapeercounty.org; TKubasiak@countyofbranch.com; Waters,
Nancy; wendyg@up.net; zukerd@clinton-county.org;
TASNOW@kacounty.com
Subject: SOS Fund Raiser

GCSI will be holding a fund raiser for Secretary of State, Ruth Johnson, on Wednesday, March 19, from 4:30pm to 6pm at their offices. You are all invited to attend the event at

GCSI offices in Lansing I have attached the information.
Please consider attending and giving a donation. Donations
of any amount are appreciated. For anyone who is not able
to attend, send the checks to Bill Zaagman at GCSI and he'll
deliver them. If you have any questions, please contact me.

<ATT00001.jpg>

<Ruth Johnson SOS.pdf>



Cordially Invites You to an Event Honoring
**Secretary of State
Ruth Johnson**

Wednesday, March 19 • 4:30-6:00 p.m.

The Offices of GCSI

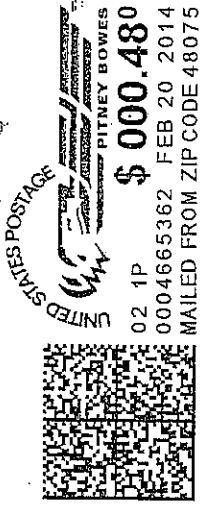
Second Floor, 120 N. Washington Square, Lansing, MI

Maximum contribution limit per individual
is \$6,800 or \$68,000 per PAC.

Please make checks payable to: Ruth Johnson for Michigan
11750 Eagle Road, Davisburg, MI 48350. No corporate contributions, please.

**For more information or to
RSVP please contact
Tara Paksi at 517.484.6216
or paksi.t@gcsionline.com.**

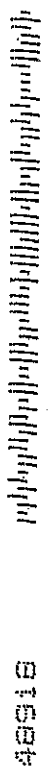
Mark Brewer
17000 W. Ten Mile Rd
Southfield, MI 48075



BUREAU OF ELECTIONS
MI DEPT OF STATE

2014 FEB 26 PM 4:00

Michigan Department of State
Bureau of Elections
Richard H. Austin Building -- First Floor
430 West Allegan Street
Lansing, MI 48918





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

March 5, 2014

Daniel C. Krueger
14117 Brook Lane
Holland, MI 49424

Janet Koop, Treasurer
Ruth Johnson for Michigan
11750 Eagle Road
Davisburg, MI 48350

Dear Mr. Krueger and Ms. Koop:

The Department of State (Department) received a formal complaint filed against you by Mark Brewer, 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 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.

Mr. Brewer alleges that Mr. Krueger has improperly used public resources to solicit contributions to the re-election campaign of Ruth Johnson.

The Campaign Finance Act provides that if an allegation involves a campaign or committee with which the secretary of state is connected, directly or indirectly, the secretary of state shall refer the matter to the attorney general to determine whether a violation of this Act has occurred. MCL 169.215(9). The purpose of this letter is to inform you that Mr. Brewer's complaint is being referred to the attorney general as provided in the MCFA, and of your rights to respond to the allegations.

In Michigan, it is unlawful for a public body, or an individual acting on its behalf, to use or authorize the use of equipment, supplies, personnel, funds, or other public resources to make a contribution or expenditure. MCL 169.257(1). 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 the nomination or election of a candidate. MCL 169.204(1), 169.206(1). A person who knowingly violates this provision may be charged with a misdemeanor offense. MCL 169.257(3).

Letter to Daniel C. Krueger and Janet Koop
March 5, 2014
Page Two

In support of his complaint, Mr. Brewer provided a copy of an email sent from DKrueger@miottawa.org with a subject "SOS Fund Raiser". Mr. Brewer also provided a copy of an attachment to the email which is an invitation to an event to be held by GCSI on behalf of Ruth Johnson.

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. You may file a single response signed by both of you, or you may each submit your own signed response to the complaint. Your response may include any written statement or additional documentary evidence you wish to submit. All materials must be sent to Mr. Robert Ianni, Bureau Chief, Department of Attorney General, Consumer & Environmental Protection Bureau, 525 W. Ottawa, 6th Floor, Lansing, Michigan 48909. If you fail to submit a response, the attorney general will render a decision based on the evidence furnished by the complainant.

A copy of your reply will be provided to Mr. Brewer, who will have an opportunity to submit a rebuttal statement to the attorney general. After reviewing all of the statements and materials provided by the parties, the attorney general will determine whether "there may be reason to believe that a violation of [the MCFA] has occurred [.]" MCL 169.215(10). If you have any questions concerning this matter, you may contact Mr. Ianni at (517) 335-3571.

Sincerely,



William R. Kordenbrock
Chief Legal Counsel
Michigan Department of State

WRK/mkn
Enclosures

cc: Mark Brewer
Department of Attorney General