



Michigan Department of State
Campaign Finance Complaint Form

BUREAU OF ELECTIONS • RICHARD H. AUSTIN BUILDING - 1st Floor
430 W. ALLEGAN STREET • LANSING, MICHIGAN 48918

RECEIVED
MICHIGAN
2019 OCT 15 PM 2:20
BUREAU SEAL

This complaint form may be used to file a complaint alleging that someone violated the [Michigan Campaign Finance Act](#) (MCFA). For instructions on how to complete this form, see the Campaign Finance [Complaint Guidebook & Procedures](#) document. All spaces are required unless otherwise indicated.

Section 1. Complainant		
Your Name Dillon Breen		Daytime Telephone Number 734-718-0207
Mailing Address 38987 Stacey Drive		
City Livonia	State MI	Zip 48154-1068
Email (optional)		

Section 2. Alleged Violator		
Name Colleen Crossey		
Mailing Address 22279 Brockshire St.		
City Novi	State MI	Zip 48375
Email (optional)		

Section 3. Allegations (Use additional sheets if more space is needed.)

Section(s) of the MCFA alleged to be violated: **Sec. 47**

Explain how those sections were violated:

Postcards advocating the violators election to city Council
display an insufficient disclaimer per Sec. 47(1) of the
MCFA. Does not include the full mailing address as
required. In 2017, Ms. Crossey had similar complaints filed
against her, and continues to violate the act.

Evidence included with the submission of the complaint that supports the allegations:

Copy of mail piece recieved.

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

10/10/19

Date

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

If, after a reasonable inquiry under the circumstances, you are unable to certify that certain factual contentions are supported by evidence as indicated above, you may 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.

Section 6. Submission

Once completed, mail or hand deliver the complaint form with your evidence to the address below. The complaint is considered filed upon receipt by the Bureau of Elections.

Michigan Department of State
Bureau of Elections
Richard H. Austin Building – 1st Floor
430 West Allegan Street
Lansing, Michigan 48918

FROM: 4231 W. MICHIGAN DRIVE | NOVI, MI 48377

*****ECPWASH**R 074 83

Michigan Department of State
Bureau of Elections
PO Box 20126
Lansing, MI 48901-0726

PSRT STD
US POSTAGE
PAID
MASS MAILING

VOTE FOR CHANGE
VOTE FOR THE THREE C'S
ON TUE NOV 5

CAROLYN UPTON
NOVI CITY COUNCIL

CHRISTINE INGLES
MAYOR OF NOVI

COLLEEN CROSSEY
NOVI CITY COUNCIL

PAID FOR: CAROLYN UPTON, FRIENDS OF COLLEEN CROSSEY, CHRISTINE INGLES, HANNAH GUNDEL, JEFF

CONNECT WITH US:

WEB: CarolynUptonForCouncil.com

Email: CarolynUptonNovi@gmail.com

FB: [CarolynUptonForNoviCityCouncil](https://www.facebook.com/CarolynUptonForNoviCityCouncil)

EMAIL: Christine4mayor@gmail.com

FB: [ChristineForMayorOfNovi](https://www.facebook.com/ChristineForMayorOfNovi)

WEB: ColleenCrossey.com

Email: ccrossey@umich.edu

FB: [Crossey8](https://www.facebook.com/Crossey8)



CONCERNED ABOUT

- OVERDEVELOPMENT THAT'S CAUSING TRAFFIC JAMS AND OVERWHELMING OUR PUBLIC SERVICES
- BUILDERS UPROOTING OUR TREES AND PAVING OVER OUR CITY
- SELECT BUSINESSES RECEIVING CITY COUNCIL APPROVED TAX ABATEMENTS THAT DRAIN FUNDS FROM OUR SCHOOLS AND PUBLIC SERVICES

CARES ABOUT

- THOUGHTFUL, CONTROLLED GROWTH OF OUR CITY
- OUR WOODLANDS, OLD TREES, AND THE UNIQUE CHARACTER OF OUR COMMUNITY
- ADEQUATE FUNDING FOR OUR SCHOOLS, OUR POLICE, AND OUR FIREFIGHTERS

COMMITTED TO

- STANDING UP FOR THE NEEDS AND WANTS OF NOVI RESIDENTS
- DEMANDING THAT DEVELOPERS OBEY THE CITY'S WOODLANDS PRESERVATION REQUIREMENTS
- ELIMINATING UNNECESSARY TAX ABATEMENTS TO PRESERVE THE FUNDING FOR OUR SCHOOLS, OUR POLICE, AND OUR FIREFIGHTERS

GREEN THINGS FROM NOVI

VOTE FOR CHANGE

VOTE FOR THE THREE C'S
ON TUE NOV 5

CAROLYN UPTON
NOVI CITY COUNCIL

COLLEEN CROSSEY
NOVI CITY COUNCIL

CHRISTINE INGLES
MAYOR OF NOVI



STATE OF MICHIGAN
JOCELYN BENSON, SECRETARY OF STATE
DEPARTMENT OF STATE
LANSING

November 4, 2019

Colleen Crossey
22279 Brockshire Street
Novi, Michigan 48375

Re: *Breen v. Crossey*
Campaign Finance Complaint
No. 2019-10-39-47

Dear Ms. Crossey:

The Department of State (Department) has received a formal complaint 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. A copy of the complaint is enclosed.

The complaint was submitted to the Department on October 15, 2019 and alleges that you have distributed campaign materials that did not include a proper paid for by statement. A picture of the campaign material is included with the complaint.

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 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. 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.* An explanation of the investigation process is enclosed with this letter and a copy is available on the Department's website.

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.

Colleen Crossey
November 4, 2019
Page 2

Given that the Department previously found a violation against you in 2017 for failing to list a proper paid for by statement on your campaign materials, should you choose to file a response to the instant complaint, **please address why the Department should not treat this as a knowing violation given your 2017 warning.**¹

A copy of your answer will be provided to Mr. Breen, 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 44(5) of the Act.

If you have any questions concerning this matter, you may contact me at (517) 373-2540.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam Fracassi", with a stylized flourish at the end.

Adam Fracassi
Bureau of Elections
Michigan Department of State

Enclosure
c: Brett Gillespie

¹ *Fogelman v. Crossey*, available at:
https://www.michigan.gov/documents/sos/Fogelman_v_Crossey_630082_7.pdf



STATE OF MICHIGAN
JOCELYN BENSON, SECRETARY OF STATE
DEPARTMENT OF STATE
LANSING

November 4, 2019

Colleen Crossey
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Novi, Michigan 48375

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Colleen Crossey
November 4, 2019
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Sincerely,

A handwritten signature in black ink, appearing to read "Adam Fracassi", written in a cursive style.

Adam Fracassi
Bureau of Elections
Michigan Department of State

Enclosure
c: Brett Gillespie

¹ *Fogelman v. Crossey*, available at:
https://www.michigan.gov/documents/sos/Fogelman_v_Crossey_630082_7.pdf

Fracassi, Adam (MDOS)

From: Sheila Cummings <sheila@cummingslawpllc.com>
Sent: Monday, December 2, 2019 1:09 PM
To: Fracassi, Adam (MDOS)
Cc: Heather Cummings
Subject: Breen v. Crossey No. 2019-10-39-47 Response
Attachments: Breen v Crossey No 2019-10-39-47 Response.pdf

Mr. Fracassi,

Attached please find Ms. Crossey's Response to the Complaint filed against her by Mr. Breen in the above-referenced matter. A hard copy of this letter and enclosure will also be sent via first class mail today.

Should you have any questions, please contact me.

Sincerely,

Sheila C. Cummings

423 N. Main Street, Suite 200

Royal Oak, MI 48067

T: (248) 733-3405 • F: (248) 733-3666

CUMMINGS & CUMMINGS

— LAW GROUP, PLLC —

This message originates from the law firm of Cummings & Cummings Law Group, PLLC, and may contain legally privileged and confidential information intended solely for the use of the addressee. If you are not the intended recipient and have received this message in error, please delete it and advise the sender by reply email. Any unauthorized reading, distribution, copying, or other use of this message or its attachments is strictly prohibited.

CUMMINGS & CUMMINGS

LAW GROUP, PLLC

423 N. MAIN STREET, SUITE 200
ROYAL OAK, MI 48067

TELEPHONE (248) 733-3405

FAX (248) 733-3666

WWW.CUMMINGSLAWPLLC.COM

SHEILA C. CUMMINGS
HEATHER L. CUMMINGS

December 2, 2019

OF COUNSEL
MARY ELLEN GUREWITZ

**VIA EMAIL AND
FIRST CLASS MAIL**

Adam Fracassi
Bureau of Elections
Michigan Department of State
Richard H. Austin Building, 1st Floor
430 W. Allegan
Lansing, MI 48918

Re: *Breen v. Crossey*
Campaign Finance Complaint
No. 2019-10-39-47

Dear Mr. Fracassi:

I am writing on behalf of my client, Colleen Crossey, to respond to the above-referenced complaint filed by Dillon Breen alleging that Ms. Crossey violated Section 47 of the Michigan Campaign Finance Act ("MCFA" or the "Act").

Introduction

The complaint specifically charges Ms. Crossey with "failing to include a complete and correct identification statement on certain campaign-related materials" pursuant to Section 47(1) of the Act. The mailer at issue in this complaint was a joint mailer paid for by three local candidates (the "Joint Mailer"). While the Joint Mailer included a "Paid for by" statement with all candidate committee names and the address of the candidate who put the piece together (along with a number of other pieces of contact information for each candidate), admittedly, Ms. Crossey's street address was missing.¹

Regardless of the amount of transparency involved in the Joint Mailer, Ms. Crossey's political opponents have filed a petty complaint against her for a missing address. Further, the complaint falsely claims that "[i]n 2017, Ms. Crossey had similar complaints filed against

¹ A subsequent copy of the mailer was corrected to include Ms. Crossey's address. *See* enclosed.

her, and continues to violate the act.” This is untrue. As an initial matter, one complaint was filed in 2017, not multiple complaints. Additionally, the complaint in 2017 involved Ms. Crossey’s own campaign material which is a different issue than the one involved here—a joint mailer involving two other candidates. This response will clarify that difference.

Mr. Breen’s complaint against Ms. Crossey should be dismissed because the Joint Mailer provides transparency, which is the purpose behind Section 47 of the Act as contemplated by the Legislature; the Joint Mailer should not be considered a knowing violation because it is different from the communications at issue in the 2017 complaint; and the complaint is nothing more than a frivolous attack filed mere weeks before the Election by bullying, political opponents.

I. The Joint Mailer Provides Transparency

In enacting Section 47, the Legislature “sought to encourage responsible political debate by proscribing anonymity” and “requiring the disclosure of the identity of the sponsor of any political material.” See *Eyde Construction Co. v. Meridian Twp.*, 119 Mich. App. 792, 795, 327 N.W.2d 364 (1982). Section 47 demands transparency behind political communications. Ms. Crossey’s oversight here is not a lack of transparency and does not fly in the face of the sound policy requirements of Section 47 of the Act. Ms. Crossey did not shy away from these requirements.

Ms. Crossey’s name and contact information are all over the Joint Mailer. In fact, along with the required “Paid for by Friends of Colleen Crossey” evident on the mailer, the communication in question includes not one—not even two—but three addresses in which to obtain further information about the candidate. Specifically, the mailer includes the candidate committee’s name, the candidate’s website, the candidate’s email address, and the candidate’s Facebook page. Moreover, this is not an attack piece against another candidate wherein the parties paying were attempting to hide. Clearly, Ms. Crossey is not trying to hide her identity. There is not a lack of transparency.

Yes, Ms. Crossey’s address is missing from the Joint Mailer. And, yes, candidates must follow the MCFA. However, for Ms. Crossey to face a misdemeanor for a missing street address on a piece that provides multiple other addresses and full transparency is an absurdity. A misdemeanor for a missing address on a piece that contains multiple other addresses is akin to silencing civic participation which seems to be the goal of Ms. Crossey’s bullying, political opponents in filing this complaint. Simply put, finding Ms. Crossey guilty of a misdemeanor would be a misuse and misapplication of the Act.

II. The Complaint Should Not Be Treated as a Knowing Violation Because the Joint Mailer is Different from Ms. Crossey’s Communications at Issue in the 2017 Complaint

In its letter dated November 4, 2019, the Department specified, “please address why the Department should not treat this as a knowing violation given your 2017 warning.” For

the following reasons, the campaign material and the circumstances surrounding the mailer in question in this complaint are dissimilar and, therefore, should be treated differently by the Department.

In 2017, Ms. Crossey's campaign material was at issue. Specifically, Ms. Crossey was missing "Paid for by" statements, both her candidate committee name and address, on her own business cards and campaign website. At issue in the current complaint is the Joint Mailer, a joint piece of campaign literature that Ms. Crossey collaborated on with other candidates running in the City of Novi, Carolyn Upton (a candidate for City Council) and Christine Ingles (a candidate for Mayor). This was the first time all three candidates worked on a piece of campaign literature together. The piece of literature contained a lot of information that the candidates were focused on getting correct including, but not limited to, a number of website, Facebook, and email addresses for each candidate.

Further, unlike Ms. Crossey's campaign material at issue in 2017, the Joint Mailer does contain a "Paid for by" statement that includes all three candidate committee names. Admittedly, though, the Joint Mailer is missing two of the three candidate committee addresses—Ms. Crossey's being one of the missing addresses. The street address included on the mailer is the address for Carolyn Upton who paid for the piece and sought reimbursement from Ms. Crossey and Ms. Ingles. Ms. Crossey incorrectly assumed the "Paid for by" disclaimers were sufficient with the inclusion of Ms. Upton's address along with the candidate committee names.

The Joint Mailer and the circumstances surrounding the development of it are different from the 2017 complaint against Ms. Crossey that involved her own campaign material. The differences in both the collaboration of the piece and what is missing from the Joint Mailer (only the street address of Ms. Crossey while a number of online addresses are included) warrant not treating this current complaint as a knowing violation despite the 2017 warning.

III. The Complaint is a Frivolous Attack

This complaint, filed mere weeks before the November 5, 2019 Election in which Ms. Crossey was a candidate for Novi City Council, is long on harassment and short on substance. Mr. Breen is not a resident of Novi. He is a resident of Livonia. He would not have received the mailer at issue in this complaint. Mr. Breen's motivation in bringing this complaint is understood in the context of him being an employee and political operative of Dave Staudt, one of Ms. Crossey's opponents in the race for City Council. Similarly, Mr. Staudt engaged another employee and political operative, Gregory Fogelman, to file the 2017 complaint against Ms. Crossey for campaign material in her potential run for Oakland County Commissioner.

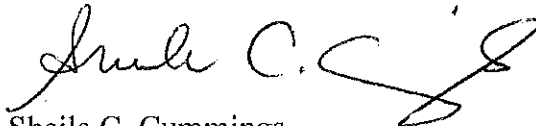
In this current complaint, Mr. Staudt and his associate seem to have gone to great lengths to find a reason to file a complaint against Ms. Crossey. They were unable to find a reason against Ms. Crossey's own campaign material. Therefore, they went after a minor

discrepancy in the Joint Mailer—a missing street address. A complaint against a missing street address in a mailer that includes an abundance of transparency in the way of names and addresses is frivolous and petty.

In conclusion, because the Joint Mailer provides the transparency as contemplated by the policy behind Section 47 of the Act; the Joint Mailer should not be considered a knowing violation because it is different from the communications at issue in the 2017 complaint; and the complaint is nothing more than a petty attack filed mere weeks before the Election by political opponents, Mr. Breen's complaint against Ms. Crossey should be dismissed.

Sincerely,

CUMMINGS & CUMMINGS LAW GROUP, PLLC

A handwritten signature in black ink, appearing to read 'Sheila C. Cummings', with a stylized flourish at the end.

Sheila C. Cummings

Enclosure

FROM: 42806 BROOKSTONE DRIVE | NOVI, MI 48377

- PAID FOR BY COMMITTEE TO ELECT CAROLYN UPTON
42806 BROOKSTONE DRIVE NOVI MI 48377
- PAID FOR BY FRIENDS OF COLLEEN CROSSEY
22279 BROCKSHIRE STREET NOVI MI 48375
- PAID FOR BY CHRISTINE INGLES MAYORAL CAMPAIGN FUND
45119 NINE MILE ROAD NORTHVILLE MI 48167

VOTE FOR CHANGE VOTE FOR THE THREE C'S ON TUE NOV 5



PAID FOR BY CTE CAROLYN UPTON, FRIENDS OF COLLEEN CROSSEY, CHRISTINE INGLES MAYORAL CAMPAIGN FUND

CONNECT WITH US:



WEB: CarolynUptonForCouncil.com
Email: CarolynUptonNovi@gmail.com
FB: CarolynUptonForNoviCityCouncil

EMAIL: Christine4mayor@gmail.com
FB: ChristineforMayorOfNovi

WEB: ColleenCrossey.com
Email: ccrossey@umich.edu
FB: Crossey8

CONCERNED ABOUT

- OVERDEVELOPMENT THAT'S CAUSING TRAFFIC JAMS AND OVERWHELMING OUR PUBLIC SERVICES
- BUILDERS UPROOTING OUR TREES AND PAVING OVER OUR CITY
- SELECT BUSINESSES RECEIVING CITY COUNCIL APPROVED TAX ABATEMENTS THAT DRAIN FUNDS FROM OUR SCHOOLS AND PUBLIC SERVICES

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COMMITTED TO

- STANDING UP FOR THE NEEDS AND WANTS OF NOVI RESIDENTS
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- ELIMINATING UNNECESSARY TAX ABATEMENTS TO PRESERVE THE FUNDING FOR OUR SCHOOLS, OUR POLICE, AND OUR FIREFIGHTERS

GRETTINGS FROM NOVI

VOTE FOR CHANGE

**VOTE FOR THE THREE C'S
ON TUE NOV 5**

CAROLYN UPTON
NOVI CITY COUNCIL

COLLEEN CROSSEY
NOVI CITY COUNCIL

CHRISTINE INGLES
MAYOR OF NOVI



STATE OF MICHIGAN
JOCELYN BENSON, SECRETARY OF STATE
DEPARTMENT OF STATE
LANSING

December 11, 2019

Dillon Breen
38987 Stacey Drive
Livonia, MI 48154

Dear Mr. Breen:

The Department of State received a response to the complaint you filed against Colleen Crossey, 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. Additionally, consistent with the Department's Notice of the Complaint, **should you elect to file a rebuttal, please specifically address whether the Department should treat this as a knowing violation of MCL 169.247.**

Sincerely,

A handwritten signature in black ink, appearing to read "Adam Fracassi".

Adam Fracassi
Bureau of Elections
Michigan Department of State

c: Sheila Cummings, Attorney for Colleen Crossey

CUMMINGS & CUMMINGS

LAW GROUP, PLLC

423 N. MAIN STREET, SUITE 200
ROYAL OAK, MI 48067

TELEPHONE (248) 733-3405

FAX (248) 733-3666

WWW.CUMMINGSLAWPLLC.COM

SHEILA C. CUMMINGS
HEATHER L. CUMMINGS

December 2, 2019

OF COUNSEL
MARY ELLEN GUREWITZ

VIA EMAIL AND FIRST CLASS MAIL

Adam Fracassi
Bureau of Elections
Michigan Department of State
Richard H. Austin Building, 1st Floor
430 W. Allegan
Lansing, MI 48918

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Ms. Crossey’s name and contact information are all over the Joint Mailer. In fact, along with the required “Paid for by Friends of Colleen Crossey” evident on the mailer, the communication in question includes not one—not even two—but three addresses in which to obtain further information about the candidate. Specifically, the mailer includes the candidate committee’s name, the candidate’s website, the candidate’s email address, and the candidate’s Facebook page. Moreover, this is not an attack piece against another candidate wherein the parties paying were attempting to hide. Clearly, Ms. Crossey is not trying to hide her identity. There is not a lack of transparency.

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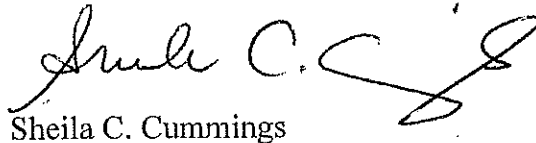
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CUMMINGS & CUMMINGS LAW GROUP, PLLC

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Sheila C. Cummings

Enclosure

the following reasons, the campaign material and the circumstances surrounding the mailer in question in this complaint are dissimilar and, therefore, should be treated differently by the Department.

In 2017, Ms. Crossey's campaign material was at issue. Specifically, Ms. Crossey was missing "Paid for by" statements, both her candidate committee name and address, on her own business cards and campaign website. At issue in the current complaint is the Joint Mailer, a joint piece of campaign literature that Ms. Crossey collaborated on with other candidates running in the City of Novi, Carolyn Upton (a candidate for City Council) and Christine Ingles (a candidate for Mayor). This was the first time all three candidates worked on a piece of campaign literature together. The piece of literature contained a lot of information that the candidates were focused on getting correct including, but not limited to, a number of website, Facebook, and email addresses for each candidate.

Further, unlike Ms. Crossey's campaign material at issue in 2017, the Joint Mailer does contain a "Paid for by" statement that includes all three candidate committee names. Admittedly, though, the Joint Mailer is missing two of the three candidate committee addresses—Ms. Crossey's being one of the missing addresses. The street address included on the mailer is the address for Carolyn Upton who paid for the piece and sought reimbursement from Ms. Crossey and Ms. Ingles. Ms. Crossey incorrectly assumed the "Paid for by" disclaimers were sufficient with the inclusion of Ms. Upton's address along with the candidate committee names.

The Joint Mailer and the circumstances surrounding the development of it are different from the 2017 complaint against Ms. Crossey that involved her own campaign material. The differences in both the collaboration of the piece and what is missing from the Joint Mailer (only the street address of Ms. Crossey while a number of online addresses are included) warrant not treating this current complaint as a knowing violation despite the 2017 warning.

III. The Complaint is a Frivolous Attack

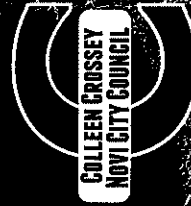
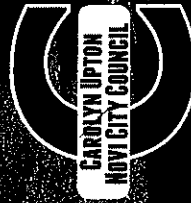
This complaint, filed mere weeks before the November 5, 2019 Election in which Ms. Crossey was a candidate for Novi City Council, is long on harassment and short on substance. Mr. Breen is not a resident of Novi. He is a resident of Livonia. He would not have received the mailer at issue in this complaint. Mr. Breen's motivation in bringing this complaint is understood in the context of him being an employee and political operative of Dave Staudt, one of Ms. Crossey's opponents in the race for City Council. Similarly, Mr. Staudt engaged another employee and political operative, Gregory Fogelman, to file the 2017 complaint against Ms. Crossey for campaign material in her potential run for Oakland County Commissioner.

In this current complaint, Mr. Staudt and his associate seem to have gone to great lengths to find a reason to file a complaint against Ms. Crossey. They were unable to find a reason against Ms. Crossey's own campaign material. Therefore, they went after a minor

FROM: 42806 BROOKSTONE DRIVE | NOVI, MI 48377

- PAID FOR BY COMMITTEE TO ELECT CAROLYN UPTON
42806 BROOKSTONE DRIVE NOVI MI 48377
- PAID FOR BY FRIENDS OF COLLEEN CROSSEY
22279 BROCKSHIRE STREET NOVI MI 48375
- PAID FOR BY CHRISTINE INGLES MAYORAL CAMPAIGN FUND
45119 NINE MILE ROAD NORTHVILLE MI 48167

**VOTE FOR CHANGE
VOTE FOR THE THREE C'S
ON TUE NOV 5**



PAID FOR BY THE CAROLYN UPTON, FRIENDS OF COLLEEN CROSSEY, CHRISTINE INGLES MAYORAL CAMPAIGN FUND

CONNECT WITH US:

WEB: CarolynUptonForCouncil.com
Email: CarolynUptonNovi@gmail.com
FB: CarolynUptonForNoviCityCouncil

EMAIL: Christine4mayor@gmail.com
FB: ChristineforMayorONovi

WEB: ColleenCrossey.com
Email: ccrossey@umich.edu
FB: Crossey8



CONCERNED ABOUT

- OVERDEVELOPMENT THAT'S CAUSING TRAFFIC JAMS AND OVERWHELMING OUR PUBLIC SERVICES
- BUILDERS UPROOTING OUR TREES AND PAVING OVER OUR CITY
- SELECT BUSINESSES RECEIVING CITY COUNCIL APPROVED TAX ABATEMENTS THAT DRAIN FUNDS FROM OUR SCHOOLS AND PUBLIC SERVICES

CARES ABOUT

- THOUGHTFUL, CONTROLLED GROWTH OF OUR CITY
- OUR WOODLANDS, OUR TREES, AND THE UNIQUE CHARACTER OF OUR COMMUNITY
- ADEQUATE FUNDING FOR OUR SCHOOLS, OUR POLICE, AND OUR FIREFIGHTERS

COMMITTED TO

- STANDING UP FOR THE NEEDS AND WANTS OF NOVI RESIDENTS
- DEMANDING THAT DEVELOPERS OBEY THE CITY'S WOODLANDS PRESERVATION REQUIREMENTS
- ELIMINATING UNNECESSARY TAX ABATEMENTS TO PRESERVE THE FUNDING FOR OUR SCHOOLS, OUR POLICE, AND OUR FIREFIGHTERS

CREATING FROM NOVI

VOTE FOR CHANGE

**VOTE FOR THE THREE C'S
ON TUE NOV 5**

CAROLYN UPTON
NOVI CITY COUNCIL

COLLEEN CROSSEY
NOVI CITY COUNCIL

CHRISTINE INGLES
MAYOR OF NOVI



MDOS 5962393-1 06/17/2020
ELEC NY \$100.00

STATE OF MICHIGAN
JOCELYN BENSON, SECRETARY OF STATE
DEPARTMENT OF STATE
LANSING

In the Matter of:

Dillon Breen
38987 Stacey Drive
Livonia, Michigan 48154

v.

Colleen Corssey
32279 Brockshire Street
Novi, Michigan 48357

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 Colleen Crossey (Respondent) hereby enters 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 §169.247 by purchasing certain campaign materials that failed to contain a proper paid for by statement by omitting the committee's full mailing address.

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 she will comply with the Act and the Rules promulgated to implement the Act.

By executing this conciliation agreement, Respondent certifies that a civil fine in the amount of \$100.00 has been paid 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.

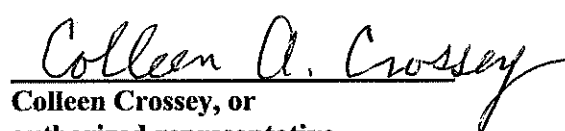
The Secretary of State and Respondent finally agree that the signatories below are authorized to enter into and bind the parties to this agreement and have done so by signing this agreement on the date below.

JOCELYN BENSON
SECRETARY OF STATE

RESPONDENT



Jonathan Brater, Director
Bureau of Elections

 6/6/2020

Colleen Crossey, or
authorized representative

Date: 07/06/2020

Date: JUNE 6, 2020