



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

June 10, 2014

Laura Cox
P.O. Box 531392
Livonia, Michigan 48153

Dear Ms. Cox:

The Department of State (Department) received a formal complaint filed by Kenneth Crider against you, alleging that you violated section 47(1) of the Michigan Campaign Finance Act (MCFA), 1976 PA 388, MCL 169.247(1), by failing to include a complete and correct identification statement on certain campaign-related material. A copy of the complaint is provided as an enclosure with this letter.

The MCFA and corresponding administrative rules require a person who produces printed material that relates to an election to include the phrase "Paid for by [name and address of the person who paid for the item]." MCL 169.247(1), Mich. Admin. R 169.36(2). A knowing violation constitutes a misdemeanor offense punishable by a fine of up to \$1,000.00, imprisonment for up to 93 days, or both. MCL 169.247(5).

In support of his complaint, Mr. Crider provided a copy of an ad purportedly published in a St. Edith Parent Association program, a copy of a picture of a badge, and an invitation to the Wayne 11th Congressional District Republican Committee Annual Lincoln-Reagan Dinner. The ad from the program states "LAURA COX FOR STATE REPRESENTATIVE [.] "Candidate for the 19th House District Representing Livonia [.] and "www.electlauracox.com [.] The badge states "LAURA COX FOR STATE REPRESENTATIVE [.] There does not appear to be a paid-for-by statement on either the ad or the badge.

The Department notes that the Department issued an interpretive statement (*Interpretive Statement to John D. Sawicki* (September 2, 1977))¹ which identified badges as an item exempt from the required identification statement. ("A campaign item, the size of which makes it unreasonable to add an identification or disclaimer, or both, as designated by the secretary of state, is exempted from this rule." R 169.36(3). Therefore, the Department dismisses this portion of Mr. Crider's complaint.

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.

¹ http://www.michigan.gov/documents/sos/Sawicki_1977_429911_7.pdf.

If you wish to file a written response to the complaint, you are required to do so within 15 business days of the date of this letter. 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 reply will be provided to Mr. Crider, who will have an opportunity to submit a rebuttal statement to the Department. After reviewing all of the statements and materials provided by the parties, the Department will determine whether "there may be reason to believe that a violation of [the MCFA] has occurred [.]" MCL 169.215(10). Note that the Department's enforcement powers include the possibility of entering a conciliation agreement, conducting an administrative hearing, or referring this matter to the Attorney General for enforcement of the criminal penalty provided in section 47(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: Kenneth Crider

To whom it may concern,

I am writing today as a concerned citizen. as the current election cycle begins to ramp up with primary elections only a few months away, more and more money is being funneled into different campaigns. This money can be tracked in most cases due to Michigan's Campaign finance laws. But the purpose of this letter is not to extol the virtues of campaign finance but rather to draw attention to a candidate who should know better and has blatantly disobeyed the law.

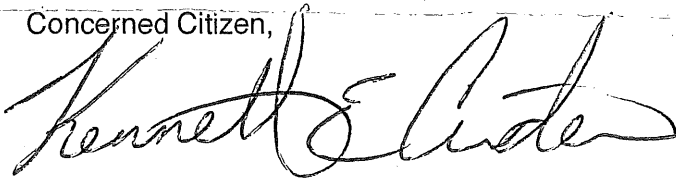
Wayne County Commissioner Laura Cox is running in the 19th Michigan House District which comprises most of Livonia. Wayne County Commissioner Laura has Violated campaign finance law. My complaint is that Wayne County Commissioner Cox (A career politician) and wife of Attorney General Mike Cox (also a Career politician) clearly understands the laws that govern politics and flagrantly disobeyed them.

On Friday, May 2, 2014 St. Edith Church in Livonia held a fundraiser in which adds were sold in a color magazine. Many local businesses and Candidates were invited to buy adds to help raise money. Wayne County Commissioner Laura Cox clearly paid for an add which clearly shows a letterhead with her "For State Representative" logo and then states "candidate for the 19th District" and ends with "www.electlauracox.com" but blatantly disregards MCL 169.247(1), R 169.36(2) and doesn't had the required "Paid for by " information.

This violation shows either her flagrant disregard of campaign finance laws or her complete ineptitude. The Wife of an Attorney who was the chief law official of the State of Michigan and according to her campaign Literature a "COP" herself most certainly would have known better. It is clear to me that Wayne County Commissioner Laura Cox feels that the law only applies to others.

The fact that Wayne County Commissioner Laura Cox failed to put a disclosure on her campaign Material is a display of ham-fisted, and incompetent management of her campaign and it proves that Wayne County Commissioner Laura Cox is a poor candidate for State Representative, and a bad Representative of the citizens of livonia.

Concerned Citizen,



5/27/2014

KENNETH E. CRIDER

BUREAU OF ELECTIONS
MI DEPT OF STATE

2014 MAY 23 AM 10:53

COMPLAINT PROCESS

If you believe someone has violated the Michigan Campaign Finance Act (the MCFA), you may file a written complaint with the Department of State (the Department). The complaint must include all of the following:

- ✓• Your name, address and telephone number.
- ✓• The alleged violator's name and address.
- ✓• A description in reasonable detail of the alleged violation, including the section or sections of the MCFA you believe were violated, an explanation of how you believe the MCFA was violated, and any other pertinent information.
- ✓• Evidence which supports your allegations.
- ✓• A certification that:

To the best of your knowledge, information, and belief, formed after a reasonable inquiry under the circumstances, each factual contention of the complaint is supported by evidence.

- However, in addition, if after a reasonable inquiry under the circumstances, you are unable to certify that certain specifically identified factual contentions of the complaint are supported by evidence, you may also certify that:

To the best of your knowledge, information, or belief, there are grounds to conclude that those specifically identified factual contentions are likely to be supported by evidence after a reasonable opportunity for further inquiry.

- Your signature immediately after the certification or certifications.

If you wish to have your complaint considered, it must include all of the above information. The Department may dismiss your complaint if any item is not included, or if the complaint is determined to be frivolous, illegible, or indefinite. If the complaint is dismissed, both you and the alleged violator will be notified.

A form for filing a complaint may be obtained from the Bureau of Elections, P.O. Box 20126, Lansing, MI 48901-0726, or on the Department's web site at <http://www.michigan.gov/sos/>.

The completed form should be sent to the following address:

Michigan Department of State
Bureau of Elections
Richard H. Austin Building – 1st Floor
430 West Allegan Street
Lansing, MI 48918
Telephone: (517) 373-2540

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

Reset Form

BUREAU OF ELECTIONS
MI DEPT OF STATE

2014 JUN -3 AM 10:03

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 Kenneth Crider | Daytime Telephone Number 734 679 6282 | |
| Mailing Address 16381 Fairway | | |
| City Livonia | State MI | Zip 48154 |

| Section 2. Alleged Violator | | |
|------------------------------------|-------------|--------------|
| Name Laura Cox | | |
| Mailing Address Po Box 531392 | | |
| City Livonia | State MI | Zip 48153 |

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

Section(s) of the MCFA violated: MCL 169.247 sec.47 (1)

Explain how those sections were violated:

Please see attached explanation of alleged violations

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

Please see attached exhibits

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

Kenneth E Cider
Signature of Complainant

5/27/2014
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

If your complaint meets the above requirements, the Department will notify the alleged violator that a complaint has been filed. The notification will include a copy of your complaint. The alleged violator will have an opportunity to file a response. You will have an opportunity to file a rebuttal to any response. You and the alleged violator will receive periodic reports about the actions taken by the Department concerning your complaint.

If the Department finds no reason to believe that your allegations are true, your complaint will be dismissed.

If the Department finds that there may be reason to believe your allegations are true, the Department must attempt to correct the violation or prevent further violations by informal methods such as a conference, conciliation, or persuasion, and may enter into a conciliation agreement with the alleged violator.

If the Department is unable to correct the violation or prevent further violations informally, an administrative hearing may be held to determine whether a civil violation of the MCFA has occurred, or the matter may be referred to the Attorney General for the enforcement of criminal penalties. An administrative hearing could result in the assessment of a civil penalty. Such a hearing would be conducted in accordance with the Michigan Administrative Procedures Act. An order issued as a result of such a hearing may be appealed to the appropriate circuit court.

WARNING: Section 15(8) of the MCFA (MCL 169.215) provides that a person who files a complaint with a false certification is responsible for a civil violation of the MCFA. Under section 15(14) of the MCFA (MCL 169.215), the Secretary of State may require a person who files a complaint with a false certification to:

- Pay the Department some or all of the expenses incurred by the Department as a direct result of the filing of the complaint.
- Pay the alleged violator some or all of the expenses, including, but not limited to, reasonable attorney fees, incurred by that person as a direct result of the filing of the complaint.
- Pay a civil fine of up to \$1,000.00.

If you have any questions about the complaint process, please write or call the Legal and Regulatory Services Administration.

Complaint #1: Candidate Wayne County Commissioner Laura Cox violated MCL 169.247 sec.47(1) which reads:

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

The attached pictures in Exhibits A-B provide proof to the blatant abuse of candidacy and lack of transparency by Candidate Wayne County Commissioner Laura Cox for failing to include a disclaimer which bears the name and address of the person paying for the fundraiser campaign advertisement and the Laura Cox for State Representative stickers.

The use of the words, “Elect” and “For” expressly refer to an election and candidate. This is in clear violation of election law.



cantoro
ITALIAN MARKET
BAKING COMPANY
TRATTORIA

presents

THE 3RD ANNUAL ST. EDITH WINE TASTING & AUCTION!



A
ST. EDITH
PARENT
ASSOCIATION

Production of

Roman Holiday



EXCLUSIVE PREMIERE EVENT ON
FRIDAY, MAY 2, 2014
7:00-9:30

At The All-New
Cantoro Italian Market & Bakery
15550 Haggerty Rd.
Northville Twp, MI

EXHIBIT - A

**LAURA
COX**
FOR STATE REPRESENTATIVE



Candidate for the 19th House District
Representing Livonia

Parishioner of St. Edith Church

Best of Luck on the 3rd Annual Wine Tasting Event!

Go Eagles!

www.electlauracox.com

MAY 2, 2014



EXHIBIT B

MAY 15, 2014

You are cordially invited to
the Wayne 11th Congressional District Republican Committee

Annual Lincoln - Reagan Dinner

with Special Guest and Featured Speaker



Attorney General Bill Schuette

Thursday, May 15, 2014

Private VIP Photo Session - 5:30pm to 6:30pm
Doors Open to Main Banquet Room - 6:00pm
Dinner and Program - 6:30pm - 8:30pm

Italian American Club
39200 Five Mile Road, Livonia, MI 48154

\$60 / person

\$550 for a Reserved Table of 10 (Limited Availability - Deadline May 9)

Private VIP Photo Reception with Attorney General Schuette
\$100/person (includes reserved seating at dinner)

Please make check out to Wayne 11th CDRC - no corporate checks please

To RSVP, and for questions, please contact Deloris Newell at:
dns33@comcast.net and 248-444-4869



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

June 27, 2014

Kenneth Crider
16381 Fairway
Livonia, Michigan 48154

Dear Mr. Crider:

The Department of State received a response to the complaint you filed against Laura Cox, which concerns an alleged violation of the Michigan Campaign Finance Act (MCFA), 1976 P.A. 388, MCL 169.201 *et seq.* A copy of the response is provided as an enclosure with this letter.

If you elect to file a rebuttal statement, you are required to send it within 10 business days of the date of this letter to the Bureau of Elections, Richard H. Austin Building, 1st Floor, 430 West Allegan Street, Lansing, Michigan 48918.

Sincerely,

A handwritten signature in cursive script that reads "Lori A. Bourbonais".

Lori A. Bourbonais
Bureau of Elections
Michigan Department of State

c: Laura Cox

June 23, 2014

Ms. Lori A. Bourbonais
Bureau of Elections
Richard H. Austin Building, 1st Floor
430 W. Allegan
Lansing, MI 48916

BUREAU OF ELECTIONS
MI DEPT OF STATE

2014 JUN 24 AM 10:56

Re: Complaint against the Laura Cox for State Representative Candidate Committee by Kenneth Crider

Dear Ms. Bourbonais:

I have reviewed your letter setting forth the complaint by Mr. Crider. I appreciate the opportunity to respond and will focus on the allegation regarding the St. Edith Parent Association Program complaint.

As I understand Mr. Crider's complaint, he claims that this advertisement violates MCL 169.247 because it does not bear "...the name and address of the person paying for the matter." The advertisement clearly does state the name "Laura Cox for State Representative" on the advertisement; this is not a case of an independent expenditure, it is clearly that the candidate's committee – my committee – is paying for the advertisement. The advertisement does display an internet url address, www.electlauracox.com. The address is, in fact, my "committee website address" as noted in paragraph 6d of my statement of organization filed with the Secretary of State on January 30, 2014. (The statement of organization form also request a "complete mailing address", 7a, and "complete street address", 7b). Thus the advertisement does meet the statutory requirement of an "address", and, indeed, the address is the same address that I put in the box, 7a, drafted by the Secretary of State.

The home page of www.electlauracox.com also contains my campaign's mailing address. As a result, the advertisement gave an interested party two (2) of the three (3) addresses required by the Secretary of State's statement of organization form for candidate committees.

Neither I nor my treasurer – who placed the advertisement – were aware of the existence of administrative rule R 136.36(3) which requires the "address" be the mailing or street address. Given my campaign's mailing address is listed on the home page of www.electlauracox.com, I believe the campaign also complied with R 136.36(2). But, if you disagree, it is clear that my campaign has clearly complied with the motivation for the rule – that an interested party be able to determine who is paying for a political advertisement. I expect this administrative rule pre-dates the internet and common usage of URL addresses, and does not include the "committee

website address" only because it is easier to update the statement of organization form than administrative rule.

In any event, to the extent you believe my campaign violated the administrative rule, I ask that you consider that we address the spirit behind the rule – and, indeed, did comply with the statute itself. I apologize for any staff time this complaint has used and to avoid any potential issues in the future, I will ensure my campaign uses the mailing address (I believe this was the first time the committee website address was used) for everything in the future.

If you have any questions, please do not hesitate to contact me. Thank you for your attention in this matter.

Best Regards,

A handwritten signature in cursive script that reads "Laura Cox". The signature is fluid and elegant, with a large initial "L" and a decorative flourish at the end.

Laura Cox



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

October 7, 2014

Laura Cox
P.O. Box 531392
Livonia, Michigan 48153

Dear Ms. Cox:

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

The MCFA and corresponding administrative rules require a person who produces printed material that relates to an election to include the phrase "Paid for by [name and address of the person who paid for the item]." MCL 169.247(1), R 169.36(2). A knowing violation constitutes a misdemeanor offense punishable by a fine of up to \$1,000.00, imprisonment for up to 93 days, or both. MCL 169.247(5).

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. Crider filed his complaint on June 6, 2014, and you filed a written response on June 24, 2014. Mr. Crider did not file a rebuttal statement with the Department.

Mr. Crider alleged that one of your campaign advertisements did not contain a complete and correct paid-for-by statement. In support of his complaint, Mr. Crider provided a copy of an ad which states, "LAURA COX FOR STATE REPRESENTATIVE Candidate for the 19th House District" and "www.electlauracox.com [.]". It appears that there is no paid-for-by statement on the ad.

In response, you filed a letter in which you asserted that you believe you "clearly complied with the motivation of the rule – that an interested party be able to determine who is paying for a political advertisement" because your campaign website contains your committee name and complete address. You further stated that you "will ensure [your] campaign uses the mailing address ... for everything in the future."

While the Department notes that your committee information could be found at your campaign website, the Act and administrative rules require that the words "Paid for by" and your

committee name and address appear on your campaign material. None of these required elements appear on the ad.

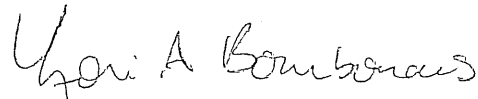
While the Department believes that the evidence tends to show that your campaign material failed to contain a complete paid-for-by statement, section 15(10) of the MCFA requires the Department to "endeavor to correct the violation or prevent a further violation by using informal methods such as a conference, conciliation, or persuasion [.]". The Department is satisfied that you will take appropriate corrective measures to avoid a further violation by ensuring your future campaign material is in compliance with the MCFA.

Additionally, the Department is advising you that section 47(1) and R 169.36(2) require you to print a complete and accurate identification statement on all campaign materials, consisting of the phrase "paid for by" followed by the full name and address of your committee. Note that all printed materials that refer to an election or your candidacy produced in the future must include this identification statement.

Please be advised that this notice has served to remind you of your obligation under the Act to identify your printed matter, and may be used in future proceedings as evidence that tends to establish a knowing violation of the Act. A knowing violation is a misdemeanor offense and may merit referral to the Attorney General for enforcement action. MCL 169.247(5), 215(10).

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

Sincerely,

A handwritten signature in cursive script that reads "Lori A Bourbonais".

Lori Bourbonais
Bureau of Elections
Michigan Department of State

c: Kenneth Crider