



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

July 19, 2017

Colleen Crossey  
22279 Brockshire St.  
Novi, MI 48375

Dear Ms. Crossey:

The Department of State (Department) received a formal complaint filed by Gregory Fogleman 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 materials. A copy of the complaint is provided as an enclosure with this letter.

The MCFA and corresponding administrative rules require a person who produces printed material that relates to an election to include the phrase "Paid for by [name and address of the person who paid for the item]." MCL 169.247(1), Mich. Admin. R 169.36(2). A knowing violation constitutes a misdemeanor offense punishable by a fine of up to \$1,000.00, imprisonment for up to 93 days, or both. MCL 169.247(6).

In support of his complaint, Mr. Fogleman provided a picture of a business card which states, "Colleen Crossey, MSW for County Commissioner [.]". There appears to be no paid-for-by statement on the business card. In addition, Mr. Fogleman also alleges that your campaign website ([www.colleencrossey.com](http://www.colleencrossey.com)) does not contain a paid-for-by-statement.

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

**If you wish to file a written response to the complaint, you are required to do so within 15 business days of the date of this letter.** 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, 1<sup>st</sup> 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. Fogleman, who will have an opportunity to submit a rebuttal statement to the Department. After reviewing all of the statements and materials provided by the parties, the Department will determine whether "there may be reason to believe that a violation of [the MCFA] has occurred [.]". MCL 169.215(10). Note that the Department's enforcement powers include the possibility of entering a conciliation agreement, conducting an

administrative hearing, or referring this matter to the Attorney General for enforcement of the criminal penalty provided in section 47(6) of the Act.

If you have any questions concerning this matter, you may contact me at (517) 241-0395.

Sincerely,

A handwritten signature in black ink that reads "Lori A. Bourbonais". The signature is written in a cursive style with a large initial "L".

Lori A. Bourbonais  
Bureau of Elections  
Michigan Department of State

c: Gregory Fogleman

## Campaign Finance Complaint Form Michigan Department of State

RECEIVED  
 MICHIGAN DEPARTMENT OF STATE  
 ELECTIONS ADMINISTRATION  
 2011 JUL 13 PM 2:40

This complaint form may be used to file a complaint alleging that someone violated the Michigan Campaign Finance Act (the MCFA, 1976 PA 388, as amended; MCL 169.201 *et seq.*). All information on the form must be provided along with an original signature and evidence. **Please print or type all information.**

I allege that the MCFA was violated as follows:

Section 1. Complainant			
Your Name <b>Gregory Fogleman</b>		Daytime Telephone Number <b>248-787-5554</b>	
Mailing Address <b>1825 Scott Lake Road</b>			
City <b>Waterford</b>	State <b>MI</b>	Zip <b>48328</b>	

Section 2. Alleged Violator		
Name <b>Colleen Crossey</b>		
Mailing Address <b>22279 Brockshire St.</b>		
City <b>Novi</b>	State <b>MI</b>	Zip <b>48375</b>

Section 3. Alleged Violations (Use additional sheet if more space is needed.)
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Section(s) of the MCFA violated:  
**MCL 169.247 (1)**

Explain how those sections were violated:

**Ms. Crossey's printed campaign business card and her campaign website ([www.colleencrossey.com](http://www.colleencrossey.com)) do not contain identification as to who paid for the business card and website, nor does it contain the address of said committee. Ms. Crossey appears to be a habitual offender of the MCFA as she has run for public office before and still does not comply with the act.**

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

**A color copy of Ms. Crossey's campaign business card is included with this complaint. The website address is listed above.**

**Section 4. Certification (Required)**

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

X

Signature of Complainant

Date

7/6/17

**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 with an original signature and evidence to the following address:

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

Revised: 01/16

REC'D  
MICHIGAN DEPT OF STATE  
ELECTIONS/GREAT SEAL  
2017 JUL 13 PM 2:40



**C**olleen **C**rossey, MSW  
for  
**C**ounty **C**ommissioner

**Democrat Representing Your Family**

**Novi • Northville • Novi Twp.**

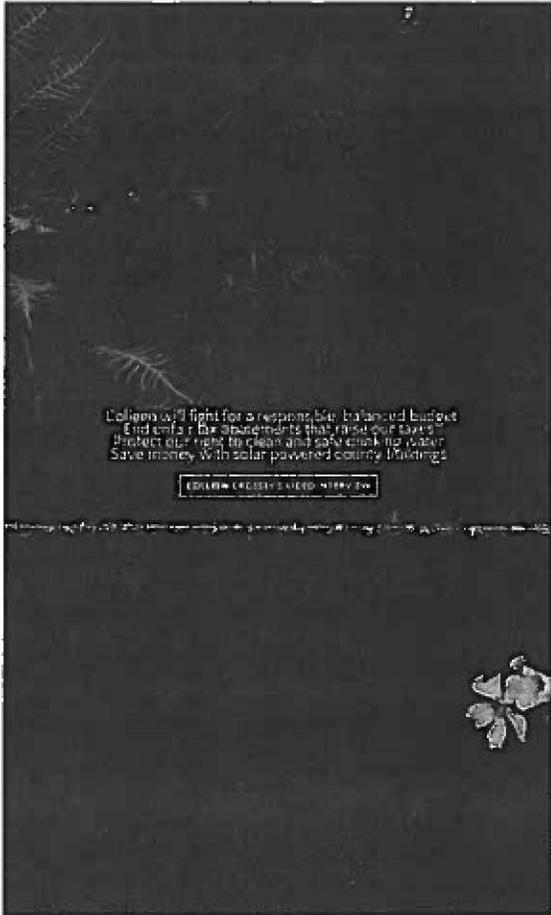
**[www.ColleenCrossey.com](http://www.ColleenCrossey.com)**

**[www.facebook.com/Crossey8](http://www.facebook.com/Crossey8)**

**PO Box 692 Novi, MI 48376**

**[ColleenCrossey@gmail.com](mailto:ColleenCrossey@gmail.com)**

Home | About Me | My Work | My Values | My Vision | My Goals





Colleen will authorize budgets that save tax payers money and prioritize services that protect and serve the taxpayer.

The Oakland County Commission funds Oakland County public services. These are the health department, animal shelter, parks, senior services, sheriff and all county programs that support and promote business.

**Submit**  
 Write or call to let us know how we can help you. We'll be glad to help you. We'll be glad to help you. We'll be glad to help you.

**Your ideas and opinions are extremely valuable! Send me a note!**

Name

Address

City

State

Zip

Phone

Website

**Submit**



PHOTO COURTESY OF OAKLAND COUNTY

Colleen will ensure that our dollars are spent for county services that businesses and families value

Colleen will fight for:

- Fight for a responsible balanced budget
- Fix our roads and bridges for the long term
- Safeguard our water quality
- End unfair tax subsidies that hurt business

Opportunities

- Support businesses to create jobs and strengthen our local economy
- Connect businesses to county SERVICES
- Ensure our county departments serve the public well

Freedom

- Mandate safe housing for seniors and families
- More methods to connect us citizens to jobs
- Easier, clean energy for county buildings



PHOTO COURTESY OF OAKLAND COUNTY

PHOTO COURTESY OF OAKLAND COUNTY

Lori A. Bourbonais  
Bureau of Elections  
Richard H. Austin Building 1st Floor  
430 W Allegan  
Lansing, Michigan 48918

2017 AUG 10 AM 9:16  
ELECTIONS/GREAT SEAL  
August 2, 2017

Dear Ms. Bourbonais,

Thank you for your letter dated July 19, 2017. Here's my response

I read the complaint about my business card. I see that, yes, indeed, the phrase "paid for by Friends of Colleen Crossey" is missing from the card. I take full responsibility for this oversight and I will immediately stop using this card. Please accept my apology for this error and know that it was not intentional.

I'm embarrassed that I didn't notice this earlier. I printed them a long time ago when I first began to run for public office. It was a small campaign with a small budget. I didn't have the money to hire anyone to check my work.

For what it's worth, it contains an address and many other ways for people to contact me. I didn't receive a direct notification of this error from Mr. Gregory Fogleman of Waterford, Michigan. If I had, I would have stopped using them immediately.

I have thrown the rest of my cards in the recycle bin and will make sure that future cards have the required phrase on them. My post cards did contain the "paid for" phrase, so I'm relieved about that.

I do not know Mr. Fogleman. He doesn't live in the district where I campaigned. I checked to see why he would go to all the trouble to lodge a complaint. I discovered that he works for Novi City Councilman Dave Staudt. I'm told that Mr. Staudt intends to run as my opponent in my 2018 race for Oakland County Commissioner. This makes me wonder if Mr. Fogleman filed this complaint as a favor to his boss.

No matter what the intent of the complaint, I take full responsibility for my oversight and will correct it. I will also make sure that my website contains the required phrase on all pages too.

Thank you for the notification. It's important to me to abide by the rules of the Michigan Campaign finance department. I will be diligent to check and double check my work in the future.

Sincerely,



Colleen Crossey, MSW



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

November 3, 2017

Colleen Crossey  
22279 Brockshire Street  
Novi, Michigan 48375

Dear Ms. Crossey:

The Department of State (Department) has completed its investigation of the complaint filed against you by Gregory Fogleman, 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. Fogleman's complaint.

The MCFA and corresponding administrative rules require a person who produces printed material that relates to an election to include the phrase "Paid for by [name and address of the person who paid for the item]." MCL 169.247(1), R 169.36(2). A knowing violation constitutes a misdemeanor offense punishable by a fine of up to \$1,000.00, imprisonment for up to 93 days, or both. MCL 169.247(6).

The Act also requires the Department to "endeavor to correct the violation or prevent a further violation by using informal methods [,]" if it finds that "there may be reason to believe that a violation ... has occurred [.]" MCL 169.215(10). The objective of an informal resolution is "to correct the violation or prevent a further violation [.]" Id.

Mr. Fogleman filed his complaint on July 13, 2017, and you filed a written response on August 10, 2017.

Mr. Fogleman alleged that you failed to include a paid-for-by statement on your campaign business cards and website. In support of his complaint, Mr. Fogleman provided a copy of a business card which stated, "Colleen Crossey, MSW for County Commissioner" and a printout from a website which stated, "Colleen Crossey MSW for Oakland County Commission [.]". Neither the business card nor the website appeared to contain a paid-for-by statement.

In your response you admitted that your campaign cards did not contain a paid-for-by statement, but that this was an oversight and you would discontinue handing those cards out. You further stated that you would ensure that your website would include a complete and correct paid-for-by statement on all of the pages.

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

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

Please be advised that this notice has served to remind you of your obligation under the Act to identify your printed matter, and may be used in future proceedings as evidence that tends to establish a knowing violation of the Act. A knowing violation is a misdemeanor offense and may merit referral to the Attorney General for enforcement action. MCL 169.247(6), 215(10).

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

Sincerely,



Lori A. Bourbonais  
Bureau of Elections  
Michigan Department of State

c: Gregory Fogleman



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

August 16, 2017

Gregory Fogleman  
1825 Scott Lake Road  
Waterford, MI 48328

Dear Mr. Fogleman:

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, 1<sup>st</sup> Floor, 430 West Allegan Street, Lansing, Michigan 48918.

Sincerely,

A handwritten signature in black ink that reads "Lori A. Bourbonais".

Lori A. Bourbonais  
Bureau of Elections  
Michigan Department of State

c: Colleen Crossey