



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

October 17, 2016

Dennis Robinson
10027 West 56th Street
Branch, Michigan 49402

Dear Mr. Robinson:

The Department of State (Department) received a formal complaint filed by Dawn Martin 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 her complaint, Ms. Martin provided a copy of a business card which states, "ELECT DENNIS ROBINSON Lake County SHERIFF [.]". The paid-for-by statement on the business card appears to omit your committee's address. Ms. Martin also provided an ad appearing in the September 29, 2016 The Bulletin Board News which states, "ELECT SHERIFF DENNIS ROBINSON [.]". There does not appear to be a paid-for-by statement on the ad.

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. Please include any evidence that reflects any corrective measures you have taken to bring your campaign material into compliance with the MCFA. 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 Ms. Martin, who will have an opportunity to submit a rebuttal statement to the Department. After reviewing all of the statements and materials

Dennis Robinson
October 17, 2016
Page 2

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 dark ink, appearing to read "Lori A. Bourbonais", written in a cursive style.

Lori A. Bourbonais
Bureau of Elections
Michigan Department of State

c: Dawn Martin

Campaign Finance Complaint Form
Michigan Department of State

RECEIVED/FILED
1001 DEPARTMENT OF STATE
2016 OCT -3 PM 3:00

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 DAWN MARTIN | Daytime Telephone Number 269-760-1446 | |
| Mailing Address 10555 N TWIN CREEK RD | | |
| City IRONS | State MI | Zip 49644 |

| Section 2. Alleged Violator | | |
|--|--------------------|---------------------|
| Name DENNIS ROBINSON | | |
| Mailing Address 10627 WEST 56TH ST | | |
| City BRANCH | State MI | Zip 49402 |

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

Section(s) of the MCFA violated:

SECTION 47(1) OF THE MCFA, 1976 PA 388, MCL 169.247(1)

Explain how those sections were violated:

DENNIS ROBINSON HAS VIOLATED SECTION 47(1) OF THE MCFA, 1976 PA 388, MCL 169.247(1) BY FAILING TO INCLUDE A COMPLETE AND CORRECT IDENTIFICATION STATEMENT ON CERTAIN CAMPAIGN MATERIALS.

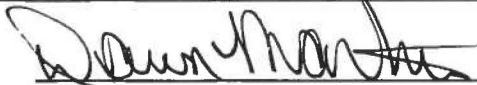
Evidence that supports those allegations (attach copies of pertinent documents and other information):

INCLUDED IS A DATED PUBLICATION AND A BUSINESS CARD (page in publication is marked)

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

9-29-16

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:

Dennis Robinson is violating section 47(i) of the
MCFA 1976 PA 388, MCL 169.247(i) by not
including a identification statement on
a business card and in a printed ad.

X



Signature of Complainant

9-29-16

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

COMPLAINT PROCESS

Section 15 of the MCFA governs the filing and processing of complaints. If you believe someone has violated the MCFA, you may file a written complaint. 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.

- 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.

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(16) 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.

A complaint may be dismissed if any required information is not included, or if the complaint is determined to be frivolous, illegible, or indefinite. All parties are notified of dismissed complaints.

When a complaint meets the above requirements, the Department notifies the alleged violator that a complaint has been filed and provides a copy of the complaint. The alleged violator will have an opportunity to file a response. The complaint filer will have an opportunity to file a rebuttal to any response. All parties receive periodic reports concerning the actions taken by the Department on a complaint.

If the Department finds no reason to believe that the allegations are true, the 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.

Accepted complaints and all supporting documentation including responses and rebuttal statements are made available on the Department's website as required by the MCFA at the conclusion of the process.


Questions? Contact us at:

Michigan Department of State
Bureau of Elections
Richard H. Austin Building – 1st Floor
430 West Allegan Street
Lansing, Michigan 48918
Phone: 517-373-2540
Email: Disclosure@Michigan.gov



Honesty, Integrity & Experience

**ELECT
DENNIS
ROBINSON**
Lake County **SHERIFF**

DennisRobinsonForSheriffLakeCountyMI.com 

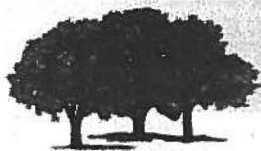
Committed to the Community & Dedicated to Progress

- 26 Years of Law Enforcement with Lake County Sheriff's Office
- Elected to Baldwin Community School Board
- Board member, Baldwin Promise Authority
- Law Enforcement Liaison & member, Lake County Triad Salt Council
- Board member, Lake County Community Foundation
- Member, Irons Area Tourist Association
- Member, Luther Lions Club
- Member, United States Police Canine Association & National Association of Professional Canine Handlers

To Learn More About Dennis & to Donate to the Campaign, Visit:

DennisRobinsonForSheriffLakeCountyMI.com
 robinsonforsherifflakecounty@gmail.com | 231-239-3428

Paid For By the Committee to Elect Dennis Robinson Lake County Sheriff



Oak Grove

FUNERAL HOME &
CREMATION CENTER

oakgrovefl.com

*Planning ahead can save money and
give you peace of mind.*

Cremation with Federal Mass \$2,995*
Free Elm Included When You Pre-Plan With Oak Grove

James M. Maher, Manager
Ludington
231-845-9898



Richard C. Jones, Manager
Muskegon
231-723-1117



Star Lake Chapel
Star Lake
231-864-3200

Pre-Paid Funeral with Star \$5,995*
Includes Casket, Vault and Cemetery Fees

*Dolls. (ordinance) fl.
Taxes Not Included!

KEEP SHERIFF DENNIS ROBINSON

ELECT SHERIFF
DENNIS ROBINSON

Tuesday, November 8

www.dennisrobinsonforsheriff.lakecountymt.com



A dog walked in to the telegram office one day. He took out a blank form and wrote on it:

"Woof. Woof. Woof. Woof. Woof. Woof. Woof. Woof. Woof."

Then he handed it to the clerk. The clerk examined the paper and said to the dog, "You know there are only nine words here? You could send another 'Woof' for the same price."

The dog replied, "But that would make no sense at all!"



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

November 15, 2016

Dawn Martin
10555 North Twin Creek Road
Irons, Michigan 49644

Dear Ms. Martin:

The Department of State received a response to the complaint you filed against Dennis Robinson, 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: Mike Neumann

**Committee to Elect Dennis Robinson
Lake County Sheriff
10027 W. 56th Street
Branch, Michigan 49402**

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

October 27, 2016

Ladies and Gentlemen:

With regard to your attached letter pertaining to a formal complaint filed by Dawn Martin, we respectfully submit the following explanation and associated remedies.

Complaint Item #1 – Committee address omitted from business card. When it was revealed to the candidate, shortly after receiving this 1st run of business cards in the Spring of 2016, that the “gmail address” was inadequate to satisfy the address requirement rule, he purchased a label maker and painstakingly added the committee mailing address to each card. He also made attempts to recover the small amount of cards that had been already been handed out, which did not contain the committee mailing address. After handing out several hundred of the corrected cards containing the address label, it was discovered that making the labels was just too costly, as well as labor intensive, and that the labels could be peeled off the cards much too easily. Shortly thereafter, Candidate Robinson made the decision to abandon distribution of those business cards, and he did personally destroy the remaining 4,000 business cards during the first week of July 2016. It is possible that a few of those cards still linger out in the public hands, but every attempt was made to resolve this oversight.

Complaint Item #2 – “Paid-for-by” statement not appearing in Bulletin Board News Ad. This was a publisher error. When the error was discovered, the publisher was contacted, and immediately took action to correct the Ad. In addition, the words “Lake County” were also added to the Ad, as was originally requested when the election date was updated to reflect the General Election date. A copy of the corrected Ad is attached.

Respectfully,


Mike E. Neumann - Treasurer

RECEIVED/FILED
MICHIGAN DEPT OF STATE
2016 NOV -2 AM 9:35
ELECTIONS/GREAT SEAL

Rec'd
10/21/16



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

October 17, 2016

Dennis Robinson
10027 West 56th Street
Branch, Michigan 49402

Dear Mr. Robinson:

The Department of State (Department) received a formal complaint filed by Dawn Martin 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 her complaint, Ms. Martin provided a copy of a business card which states, "ELECT DENNIS ROBINSON Lake County SHERIFF [.]". The paid-for-by statement on the business card appears to omit your committee's address. Ms. Martin also provided an ad appearing in the September 29, 2016 The Bulletin Board News which states, "ELECT SHERIFF DENNIS ROBINSON [.]". There does not appear to be a paid-for-by statement on the ad.

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.

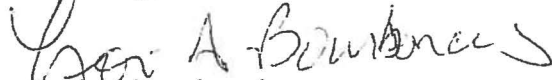
If you wish to file a written response to the complaint, you are required to do so within 15 business days of the date of this letter. Please include any evidence that reflects any corrective measures you have taken to bring your campaign material into compliance with the MCFA. Your response may include 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 Ms. Martin, 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 dark ink, appearing to read "Lori A. Bourbonais", written over the typed name.

Lori A. Bourbonais
Bureau of Elections
Michigan Department of State

c: Dawn Martin



Honesty, Integrity & Experience

**ELECT
DENNIS
ROBINSON**
Lake County **SHERIFF**

DennisRobinsonForSheriffLakeCountyMI.com

in July 2016!
[Signature]

Committed to the Community & Dedicated to Progress

- 26 Years of Law Enforcement with Lake County Sheriff's Office
- Elected to Baldwin Community School Board
- Board member, Baldwin Promise Authority
- Law Enforcement Liaison & member, Lake County Triad Self-Council
- Board member, Lake County Community Foundation
- Member, Irons Area Tourist Association
- Member, Luther Lions Club
- Member, United States Police Canine Association & National Association of Professional Canine Handlers

To Learn More About Dennis & to Donate to the Campaign, Visit:

DennisRobinsonForSheriffLakeCountyMI.com

robinsunforsherifflakecounty@gmail.com | 231-239-3428

Printed For By the Committee to Elect Dennis Robinson Lake County Sheriff

THESE

COPIES WERE DESTROYED

Corrected AD

(Side 1 of 2)



Oak Grove
FUNERAL HOME &
CREMATION CENTER
oakgrovefh.com

*Planning ahead can save money and
give you peace of mind.*

Cremation with Funeral Mass \$2,685
Free Urn Included When You Pre-Plan With Oak Grove

James M. Maher, Manager
Ludington
231-845-9898



Richard C. Jensen, Manager
Manistee
231-723-1117



Bear Lake Chapel
Bear Lake
231-864-3200

*Death Certificates &
Fees Not Included

Lake County

KEEP SHERIFF
**DENNIS
ROBINSON**

ELECT SHERIFF
DENNIS ROBINSON

Tuesday, November 8

www.dennisrobinsonforsherifflakecountymi.com



Paid for by the committee to elect Dennis Robinson Lake County Sheriff, 10027 W 56th Street, Branch, MI (231) 239-3428

Two men were walking home after a Halloween party and decided to take a shortcut through the cemetery just for laughs. Right in the middle of the cemetery they were startled by a tap-tap -tapping noise coming from the misty shadows. Trembling with fear, they found an old man with a hammer and chisel, chipping away at one of the headstones.

"Holy cow, Mister," one of them said after catching his breath, "You scared us half to death -- we thought you were a ghost! What are you doing working here so late at night?"

"Those fools!" the old man grumbled. "They misspelled my name!"

(Side 2 of 2)

FREE

FREE

THE BULLETIN BOARD NEWS

October 27, 2016

Happy *Halloween*



For advertising rates, call
(231) 510-1799
or email: bulletinboardnews@gmail.com



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

March 28, 2017

Dennis Robinson
10027 West 56th Street
Branch, Michigan 49402

Dear Mr. Robinson:

The Department of State (Department) has completed its investigation of the complaint filed against you by Dawn Martin, 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 Ms. Martin'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.

Ms. Martin filed her complaint on October 3, 2016. You filed a written response on November 2, 2016. Ms. Martin did not file a rebuttal statement with the Department.

Ms. Martin alleged that you failed to include a paid-for-by statement on a campaign ad. In support of this allegation, Ms. Martin provided the ad in the September 29, 2016 *The Bulletin Board News*, which stated, "ELECT SHERIFF DENNIS ROBINSON [,]" The ad did not appear to contain a paid-for-by statement. Ms. Martin further alleged that the paid-for-by statement on your campaign business cards, which stated "ELECT DENNIS ROBINSON LAKE COUNTY SHERIFF [,]" failed to include your committee's address.

In your response to the complaint you stated that the omission of your paid-for-by statement from your campaign ad was a "publisher error" and that a corrected ad ran in the October 27, 2016 issue of *The Bulletin Board News*. You provided a copy of the corrected ad, which appeared to contain a complete and correct paid-for-by statement. You also stated that the omission of the committee's address from the paid-for-by statement on your campaign business cards was corrected prior to the complaint being filed. You explained that shortly after the campaign received the first run of business cards, it learned that the email address did not satisfy

Dennis Robinson
March 28, 2017
Page 2

the section 47 requirement to include the committee's address. You further explained that as soon as this was brought to your attention you first attempted to correct the remaining cards with a label and then destroyed the remaining cards during July of 2016.

While the Department believes that the evidence tends to show that your original 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 took appropriate corrective measures to bring your campaign material into 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(6), 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 dark ink, appearing to read "Lori A. Bourbonais", written in a cursive style.

Lori A. Bourbonais
Bureau of Elections
Michigan Department of State

c: Dawn Martin