



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

July 14, 2016

Anna Chatten  
8416 Woodland Shore Drive  
Brighton, Michigan 48114

Dennis Michael Palmer  
10382 Grand River Road  
Brighton, Michigan 48116

Robert Potocki  
8420 Woodland Shore Drive  
Brighton, Michigan 48114

James Sarna  
8266 Woodland Shore Drive  
Brighton, Michigan 48114

Dear Ms. Chatten, Mr. Palmer, Mr. Potocki, and Mr. Sarna:

The Department of State (Department) received formal complaints filed by Buddy Moorehouse against each of 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 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(6).

In support of his complaints, Mr. Moorehouse provided a copy of a business card which states, "Supervisor – Jim Sarna [,] Clerk – Bob Potocki [,] Trustee – Anna Chatten [,] Trustee – Mike Palmer [,]" The paid-for-by statement on this card appears to omit the words "paid for by" and your committees' addresses.

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.

Anna Chatten  
Dennis Michael Palmer  
Bob Potocki  
Jim Sarna  
July 14, 2016  
Page 2

**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. You may each submit an answer, or you may submit one answer signed by each of you. 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, 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. Moorehouse, 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,



Lori A. Bourbonais  
Bureau of Elections  
Michigan Department of State

c: Buddy Moorehouse

RECEIVED/FILED  
MICHIGAN DEPT OF STATE

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

2016 JUL -8 PM 2:32

ELECTIONS/GREAT SEAL

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 Buddy Moorehouse		Daytime Telephone Number (517) 515-9496
Mailing Address 5700 Scythe Court		
City Gregory	State MI	Zip 48137

Section 2. Alleged Violator		
Name Robert Potocki		
Mailing Address 8420 Woodland Shore Drive		
City Brighton	State MI	Zip 48114

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

Section(s) of the MCFA violated:

169.247, Subsection 1

Explain how those sections were violated:

Subsection 1 requires that printed material "bear the name of the person or committee paying for the printed material. The candidate's printed material lacks the address and paid for disclosure. Business cards are not amongst the list of exempted items published by the Secretary of State. Per their guidance, "Any item not included in this list is not exempt from the Act's identification and disclaimer requirements, and must contain an identification statement, and if applicable, a disclaimer statement." Per the Michigan Secretary of State Ruling on William Everard (July 8, 1978) (see attachment), business cards are not exempt from this requirement of the Michigan Campaign Finance Act.

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

The candidate's printed materials - see attached

Campaign Finance Complaint Form  
Michigan Department of State

2016 JUL -8 PM 2:33

ELECTIONS/GREAT SEAL

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>Buddy Moorehouse</b>		Daytime Telephone Number <b>(517) 515-9496</b>
Mailing Address <b>5700 Scythe Court</b>		
City <b>Gregory</b>	State <b>MI</b>	Zip <b>48137</b>

Section 2. Alleged Violator		
Name <b>Dennis Michael Palmer</b>		
Mailing Address <b>10382 Grand River Road</b>		
City <b>Brighton</b>	State <b>MI</b>	Zip <b>48116</b>

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

Section(s) of the MCFA violated:

**169.247, Subsection 1**

Explain how those sections were violated:

Subsection 1 requires that printed material "bear the name of the person or committee paying for the printed material. The candidate's printed material lacks the address and paid for disclosure. Business cards are not amongst the list of exempted items published by the Secretary of State. Per their guidance, "Any item not included in this list is not exempt from the Act's identification and disclaimer requirements, and must contain an identification statement, and if applicable, a disclaimer statement." Per the Michigan Secretary of State Ruling on William Everard (July 8, 1978) (see attachment), business cards are not exempt from this requirement of the Michigan Campaign Finance Act.

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

The candidate's printed materials - see attached

RECEIVED/FILED  
MICHIGAN DEPT OF STATE

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

2016 JUL -8 PM 2:32

ELECTIONS/GREAT SEAL

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 Buddy Moorehouse		Daytime Telephone Number (517) 515-9496
Mailing Address 5700 Scythe Court		
City Gregory	State MI	Zip 48137

Section 2. Alleged Violator		
Name Anna Chatten		
Mailing Address 8416 Woodland Shore Drive		
City Brighton	State MI	Zip 48114

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

Section(s) of the MCFA violated:

169.247, Subsection 1

Explain how those sections were violated:

Subsection 1 requires that printed material "bear the name of the person or committee paying for the printed material. The candidate's printed material lacks the address and paid for disclosure. Business cards are not amongst the list of exempted items published by the Secretary of State. Per their guidance, "Any item not included in this list is not exempt from the Act's identification and disclaimer requirements, and must contain an identification statement, and if applicable, a disclaimer statement." Per the Michigan Secretary of State Ruling on William Everard (July 8, 1978) (see attachment), business cards are not exempt from this requirement of the Michigan Campaign Finance Act.

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

The candidate's printed materials - see attached.

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

RECEIVED/FILED  
MICHIGAN DEPT OF STATE  
2016 JUL -8 PM 2: 32

ELECTIONS/GREAT SEAL

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>Buddy Moorehouse</b>		Daytime Telephone Number <b>(517) 515-9496</b>
Mailing Address <b>5700 Scythe Court</b>		
City <b>Gregory</b>	State <b>MI</b>	Zip <b>48137</b>

Section 2. Alleged Violator		
Name <b>James Sarna</b>		
Mailing Address <b>8266 Woodland Shore Drive</b>		
City <b>Brighton</b>	State <b>MI</b>	Zip <b>48114</b>

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

Section(s) of the MCFA violated:

**169.247, Subsection 1**

Explain how those sections were violated:

Subsection 1 requires that printed material "bear the name of the person or committee paying for the printed material. The candidate's printed material lacks the address and paid for disclosure. Business cards are not amongst the list of exempted items published by the Secretary of State. Per their guidance, "Any item not included in this list is not exempt from the Act's identification and disclaimer requirements, and must contain an identification statement, and if applicable, a disclaimer statement." Per the Michigan Secretary of State Ruling on William Everard (July 8, 1978) (see attachment), business cards are not exempt from this requirement of the Michigan Campaign Finance Act.

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

The candidate's printed materials - see attached.

**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

Bm Mott  
Signature of Complainant

06/28/2016

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:*

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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



### **EXEMPTIONS**

Certain items are exempt from the identification or disclaimer requirement due their size or difficulty of placement. Following is a listing of the exempted items:

Aerial Banners	Frisbees	Pens
Ashtrays	Glasses	Pinwheels
Badges & Badge Holders	Golf Balls	Plastic Tableware
Balloons	Golf Tees	Pocket Protectors
Bingo Chips	Hats	Pot Holders
Brushes	Horns	Refrigerator Magnets
Bumper Stickers (4" X 15" Or Smaller)	Ice Scrapers	Ribbons
Buttons	Jar Lid Grippers (5" Or Smaller)	Shoe Horns
Campaign Stickers (3" X 1 1/2" Or Smaller)	Key Rings	Staple Removers
Candy Wrappers (1 1/2" X 2 1/2" Or Smaller)	Knives	Sun Glasses
Cigarette Lighters	Labels	Sun Visors
Cloth Pot Holders	Lapel Pins/Stickers	Sweatshirts
Clothes Pins	Magnifying Glasses	Swizzle Sticks
Clothing	Matchbooks	T-Shirts
Coasters	Nail Clippers	TV Scroll Advertisement
Combs	Nail Files	Whistles
Cups	Noisemakers	Wooden Nickels (Approx. Size of a 5-Cent Coin)
Drinking Glasses	Paper & Plastic Cups	Wooden Rulers (12" Or Smaller)
Earrings	Paper & Plastic Plates	Yo-Yo's
Emery Boards	Paper Weights	
Envelopes	Pencils	
Erasers	Pendants	
Fortune Cookie Messages (1/2" X 2" Or Smaller)	Pennants	

Any item not included in this list is not exempt from the Act's identification and disclaimer requirements, and must contain an identification statement, and if applicable, a disclaimer statement.

### **Committee Address Change**

A committee that has filed an amendment to its Statement of Organization to show a change of committee address is not required to note the change of address on printed matter it previously purchased as long as the printed matter contains an identification statement that was correct at the time the printed matter was produced.

## **D. CAMPAIGN FINANCE REPORTS**

Campaign finance reports are required by Michigan law to disclose all contributions and expenditures of a candidate committee.

### **1. When are campaign finance reports due?**

The following schedule is for the 2014 election cycle:



MICHIGAN DEPARTMENT OF STATE

RICHARD H. AUSTIN

SECRETARY OF STATE

STATE TREASURY BUILDING



LANSING

MICHIGAN 48918

July 7, 1978

Mr. William S. Everard  
Route #1  
Wolverine, Michigan 49799

Dear Mr. Everard:

This is in response to your three separate requests of May 2, 1978, concerning the applicability of the identification requirements of the Campaign Finance Act ("the Act"), P.A. 388 of 1976, as amended, to various advertising specialties.

The first inquiry concerns the necessity of an identification on plastic discs commonly sold under the trade name of Frisbee. You state that copy is silk-screened on these discs and, therefore, small type sizes do not reproduce well. Further, imprint area is restricted to the center portion and ranges from 4" to 4 1/2" in diameter, depending on the size of the disc selected. According to the catalog sheet included in your request, three diameter sizes are offered - 7 1/4", 8 3/4", and 9 1/4". In addition, you mention an identification would force copy into curved lettering which increases the cost of the article.

Your second request involves cloth pot holders, 6" x 6" and 7" x 7", for which you state an identification would appear illegible because of the problem of printing on the rough surface of the cloth. You indicate in order for the identification to be readable, large size type would be necessary. Space limitations serve to make the use of large type impractical.

Your third request involves two samples of political advertising cards. One sample, which measures 3 3/4" x 2 1/4", has the picture of a candidate on the front side and the name and various campaign positions of the candidate printed on the reverse side. The second sample, similar in size, opens in the middle to display a monthly calendar of 1978.

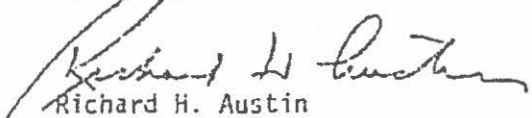
Section 47 of the Act (MCLA § 169.247) requires printed matter having reference to a candidate to bear the name and address of the person paying for the matter. The provision states, however, that rules may be promulgated to exempt items from the required identification. Rule 169.36 of the General Rules, promulgated by the Secretary of State pursuant to authority conferred by Section 15 of the Act (MCLA § 169.215) and having the effect of law, exempts campaign items, the size of which makes it unreasonable to add an identification.

Mr. William S. Everard  
Page Two

In its role as principal administrator of the Act, the Department determines it would be unreasonable to require printing of an identification on plastic discs of the type indicated in your request in instances where the printing is done by a silk-screened process. Similarly, cloth pot holders of the type presented in your second inquiry are also exempted from the identification requirements for the same reason.

However, the political advertising cards described in your third query must bear the identification required by the Act. It is not unreasonable in this instance to require the printing of the identification.

Sincerely,



Richard H. Austin  
Secretary of State

RHA:pk



## Honest-Americans **WATCHDOGS**



**BRIGHTON TOWNSHIP DEMOCRATS**

[brightontownshipwatchdogs@gmail.com](mailto:brightontownshipwatchdogs@gmail.com)

Volunteer-Donate-Learn More

[watchdogs@ruck.us](mailto:watchdogs@ruck.us)

Supervisor - Jim Sarna

Clerk - Bob Potocki

Trustee - Anna Chatten

Trustee - Mike Palmer

## **WATCHDOGS**

1. Small Government. Open. Transparent.
2. Neighborhoods **FIRST**
  - Safe Wells
  - Safe Streets
  - Clean Lakes
3. Common Sense Services
4. Voter Approval. Our Taxes. Our Money.

Committee to elect Jim Sarna   Committee to elect Robert Potocki  
Committee to elect Anna Chatten   Committee to elect Mike Palmer

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

July 28, 2016

Buddy Moorehouse  
5700 Scythe Court  
Gregory, Michigan 48137

Dear Mr. Moorehouse:

The Department of State received a response to the complaints you filed against Anna Chatten, Dennis Michael Palmer, Robert Potocki, and James Sarna, which concern 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: Anna Chatten  
Dennis Michael Palmer  
Robert Potocki  
James Sarna

July 20 2016

RECEIVED/FILED  
MICHIGAN DEPT OF STATE  
2016 JUL 25 PM 3:30  
EL 111/MS/GREAT SEAL

Lori A Bourbonais  
Bureau of Elections  
Michigan Dept of State

Dear Lori

The printed material that was submitted by Mr Moorehouse was a first attempt at getting our message out, not knowing what information we needed on the cards, we have corrected the situation, and the first ones will not be used, the new card is included, furthermore I personally have not distributed any of the first cards that Mr Moorehouse filed a complaint on and have no idea where he can accuse me personally.

It's another example of new people trying to do something in government with the status quo not wanting any opposition in Livingston county.

Please let me know if the revised card is correct, If I do not hear anything then I will think that there are no problems.

I do not plan on doing anything with them until after August 2<sup>nd</sup>. election.

Respectfully

  
James Sarna

8266 Woodland Shore Dr  
Brighton Mi 48114  
Cell 810-923-7783

## 1. NEIGHBORHOODS FIRST!

- Return taxes to neighborhoods not developers.
- Community friendly SAD services helping neighborhoods repair their streets and parks.
- Helping communities be the best they can be.

## 2. SAFE WELLS

- Fix the sewers and make them affordable.

## 3. SAFE STREETS

- Revoke zoning that threatens residential streets.

## 4. CLEAN LAKES

- Treat the resort communities as valuable assets, not cash cows.

## 5. VOTER APPROVAL. Our Taxes. Our Money.

- Demand voter approval of health, safety and spending initiatives.
- Demand common sense fact-checks of the experts.

## 6. *Small Government.* OPEN. TRANSPARENT.

- American Democracy. Community Discussions. Facts and Analysis.
- No more missing documents, shredding, off-camera votes and community repression.
- Get rid of elevated thrones, 3 minute rules, smoke and mirrors, burned documents and channel 15 propaganda.

**NOVEMBER 8 - VOTE to GET BACK ON TRACK!!!!**

Paid by:

Committee to elect Anna Chatten, 8416 Woodland Shore Dr, Brighton MI 48114  
Committee to elect Jim Sarna, 8266 Woodland Shore Dr, Brighton, MI 48114

Committee to elect Robert Potocki, 8420 Woodland Shore Dr, Brighton, MI 48114  
Committee to elect Mike Palmer, 10382 E. Grand River, Brighton, MI 48114



# WATCHDOGS

Watchdogs.Ruck.US

## BRIGHTON TOWNSHIP CANDIDATES –AMERICANS-DEMOCRATS

Anna Chatten



### TRUSTEE

- New Mom
- Safe Water/Streets
- Engineer
- Indy Mechanic
- Next Generation Leader

anna.chatten@watchdogs.ruck.us  
anna.chatten@watchdogs.ruck.us  
www.facebook.com/annachatten

Jim Sarna



### SUPERVISOR

- UPS Retiree
- Woodland Lake
- President WLSHA
- People Power
- Neighborhoods First

jim.sarna@watchdogs.ruck.us  
jim.sarna@watchdogs.ruck.us  
www.facebook.com/jimsarna

Bob Potocki



### CLERK

- Retiree
- Long Time Resident
- Economist-Logistics
- Fix the Waste
- Veteran
- Common Sense

electbobpotock@gmail.com  
bob-potocki@watchdogs.ruck.us  
www.facebook.com/bobpotocki

Mike Palmer



### TRUSTEE

- Former Brighton City Councilman
- GM Security
- Veteran
- Honest
- The Peoples Money

electmikepalmer@gmail.com

**ONLY THE FACTS.** Thousands of research hours. Years attending meetings.  
We Deliver: **"SAFE WATER. SAFE STREETS. LESS BLARNEY."**

VOTE.DONATE.VOLUNTEER Watchdogs.Ruck.US



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

August 8, 2016

Buddy Moorehouse  
5700 Scythe Court  
Gregory, Michigan 48137

Dear Mr. Moorehouse:

The Department of State received two additional responses to the complaints you filed against Anna Chatten, Dennis Michael Palmer, Robert Potocki, and James Sarna, which concern an alleged violation of the Michigan Campaign Finance Act (MCFA), 1976 P.A. 388, MCL 169.201 *et seq.* Copies of the responses are 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,

Lori A. Bourbonais  
Bureau of Elections  
Michigan Department of State

c: Anna Chatten  
Dennis Michael Palmer  
Robert Potocki  
James Sarna



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

July 23, 2016

To Whom it may concern:

I have received your letter regarding the disclaimer missing from the business cards and have taken steps to correct the problem (paid for) by destroying all cards that were printed. It was an oversight that was missed and has been corrected once known. Thank you for your attention to this matter.

Respectfully,



Dennis M. Palmer  
10382 Grand River  
Brighton, MI. 48116

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

RECEIVED/FILED  
MICHIGAN DEPT OF STATE  
2016 AUG -1 AM 11:55  
ELECTIONS/GREAT SEAL

July 27 2016

Re: Campaign Finance Complaint Buddy Moorehouse 6/28/2016  
vs Brighton Township candidates Anna Chatten, Robert Potocki and James Sarna

Dear Ms Bourbonais:

Please accept this as a joint response to the above complaint by the undersigned.

Additional Information:

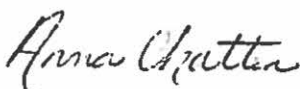
1. We do not know Mr Moorehouse.
2. He does not live within the Brighton Township Voting District.
3. Biographical information indicates he is a long-time political veteran. A Pro.
4. The business card at issue was the first piece of literature created by neighbors who are sick and tired of the many violations of our legal rights by our township.
5. As citizens we decided to participate in the political process to try and make a difference.
6. It was our first joint expenditure that totaled about \$25.
7. At the time it was created, we believed the card legally disclosed sponsorship because it clearly listed the names of our committees and the names and addresses of the committees are on file with the county clerk.
8. We sincerely believe the intent of the law was met and that any reasonable person would have no trouble finding us.
9. All remaining cards have been removed from circulation and destroyed. All future literature will be scrutinized for strict technical compliance.

Based on the above, we believe the complaint is frivolous and adds no value or integrity to the election process. In fact, it appears to be harassment and interference with the valid constitutional rights of citizens to participate in their government. Initiated by an experienced political actor.

We trust this will satisfy the Bureau of Elections concerns and will allow you to drop the complaint without prejudice.

Respectfully Submitted,

Anna Chatten



Robert Potocki



James Sarna





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

November 22, 2016

Anna Chatten  
8416 Woodland Shore Drive  
Brighton, Michigan 48114

Dennis Michael Palmer  
10382 Grand River Road  
Brighton, Michigan 48116

Robert Potocki  
8420 Woodland Shore Drive  
Brighton, Michigan 48114

James Sarna  
8266 Woodland Shore Drive  
Brighton, Michigan 48114

Dear Ms. Chatten, Mr. Palmer, Mr. Potocki, and Mr. Sarna:

The Department of State (Department) has completed its investigation of the complaints filed against you by Buddy Moorehouse, 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. Moorehouse's complaints.

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. Moorehouse filed his complaint on July 8, 2016. Mr. Palmer filed a response on July 23, 2016. Mr. Sarna filed a written response on July 28, 2016, and a supplemental response was filed by Mr. Sarna, Mr. Potocki, and Ms. Chatten on August 1, 2016. Mr. Moorehouse did not file a rebuttal statement with the Department.

Anna Chatten  
Dennis Michael Palmer  
Bob Potocki  
Jim Sarna  
November 22, 2016  
Page 2

Mr. Moorehouse alleged that you failed to include a complete paid-for-by statement on a business card. In support of his complaint, Mr. Moorehouse provided a copy of the business card which stated, "Supervisor – Jim Sarna [,] Clerk – Bob Potocki [,] Trustee – Anna Chatten [,] Trustee – Mike Palmer [.]". The paid-for-by statement on the business card appeared to omit your committees' addresses.

In your responses you admitted that your business cards were not in compliance with the Act at the time the complaint was filed, but once the omission was brought to your attention you destroyed the cards in question and printed new campaign material with the correct and complete paid-for-by statements on them. You provided a copy of the new campaign piece, and it appears that this new material contained complete and correct paid-for-by statements.

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 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,



Lori A. Bourbonais  
Bureau of Elections  
Michigan Department of State

c: Buddy Moorehouse