

8/30/2016

Rick Jones
2982 East St. Joseph Hwy.
Grand Ledge, MI 48837

Lori A. Bourbonais
Bureau of Elections
Michigan Department of State
Richard A. Austin Bld. 1st Floor
430 W. Allegan Street
Lansing, MI 48918

SUPPLEMENTAL

Dear Lori A. Bourbonais:

My Complaint against the Committee to Re-Elect Tom Reich Sheriff
Rebuttal to their Letter Dated August 23, 2016

The sudden replacement of the Committee treasurer and the unsolicited repayment of only a subset of the initially discovered improper corporate contributions and corporate in-kind contributions is highly irregular. However, the Committee's most recent actions do not diminish that a reasonable person will conclude the discovered corporate contributions and corporate in-kind contributions, violating MCFA Sec. 54, were done so "knowingly," as I have explained in my August 29, 2016 rebuttal letter. Unfortunately, the Committee's recent actions fail to properly address all of my original surviving Section 3 contentions, which have already been admitted to by Candidate Tom Reich in his first official response to my complaint, dated August 17, 2016. Even more unusual, the new Committee treasurer has now refunded an in-kind contribution for my MCFA Sec. 57, public body contention, originally dismissed by the Secretary of State (Dept.). As the new Committee treasurer stated he will be reviewing the Committee's past transactions, it prompted me to look more closely, using the check reimbursements as guidance. At the end of this letter, I have included additional Section 4, MCFA Sec. 54 contentions from older Committee campaign finance filings, but within the five (5) year legal preservation requirement. Given the large number of already established (admitted) violations, it may be prudent for the Secretary of State (Dept.) to seek formal explanations from the Committee regarding these new contentions.

Contentions the Committee Failed to Address:

I have noticed the following inconsistencies and omissions with the reimbursements provided by the Committee. However, my packet received with the letter may have been incomplete, as there are significant check sequence "jumps" present. It may be prudent for the Secretary of State (Dept.) to recheck all provided facsimile reimbursement checks against the admitted and unchallenged Section 3, MCFA Sec. 54 violations of my original complaint.

Section 3:

AUGUST 2016 PRE-ELECTION CAMPAIGN STATEMENT

In-Kind Contributions Section:

Page 35, Number: #1 "The Jewel Golf at Mackinac"

The Okemos, MI address given is the Lansing sales office for the Grand Hotel (checked with Google), which went unchallenged in Candidate Tom Riech's August 17, 2016 official response, as an MCFA Sec. 54 violation. Only the refunded Check #1203 to the Grand Hotel for a different amount marked "Reimbursement 2015" was found in the packet supplied by the Secretary of State (Dept.) with the Committee's letter.

JULY QUARTERLY STATEMENT 2015

Contributions Section:

Page 35, Number: #1 "Myers Plumbing and Heating"

Page 39, Number: #1 "Dean Trailways, dated 6/27/2015" Dean Trailways was a previously admitted to improper corporate in-kind contribution (reimbursement check(s)).

* Page 38, Number: #4 "Dean Trailways" also dated 6/27/15. I previously considered this a duplicate, not including it with my original complaint, but it may now be timely for the Secretary of State (Dept.) to inquire.

Page 39, Number: #3 "Mid-Michigan Emergency Equipment"

NB: These would have been corporate checks received with logo or reference in violation of MCFA Sec. 54, and all went unchallenged in Candidate Tom Reich's August 17, 2016 official response.

Section 4:

Contention 2:

In regards to MCFA Sec. 22, record keeping and anonymous donations:

AUGUST 2016 PRE-ELECTION CAMPAIGN STATEMENT

Contributions Section:

Page 35, Number: #1 "Miscellaneous Internet Receipts"

MCFA Sec. 57, public body contention, originally dismissed by the Secretary of State (Dept.):

The new Committee treasurer has reimbursed Michigan State University with Check #1204, even though the initial contention had been dismissed. I find this highly irregular and I hope that the Secretary of State (Dept.) will seek the Committee's explanation.

New Section 4, MCFA Sec. 54 Contentions:

October Quarterly 2014 Statement, filed October 23, 2014

In-Kind Contributions Section:

Page 1, Number: #1 "April Clobes," The home address given is the same as the business address for MSU-FCU, a credit union.

Page 1, Number: #2 "Ken Haywood," The Okemos, MI address given is the Lansing sales office for the Grand Hotel (checked with Google). The Grand Hotel was a previously admitted to improper corporate in-kind contribution (check reimbursement(s)).

Page 1, Number: #3 "Maki Warren," The home address given is the same as the business address for Dan Henry Distributors (checked with Google).

Page 2, Number: #1 "Aaron Newton," The home address given is the same as the business address given for Black Creek, a distributor of parolee tracking systems. Black Creek was a previously admitted to improper corporate in-kind contribution (check reimbursement(s)).

Page 2, Number: #2 "Sarah Serrell" The home address given is the same as the business address given for Home Depot. Home Depot was a previously admitted to improper corporate in-kind contribution (check reimbursement(s)).

Page 3, Number: #1 "Ralph Shaheen" The home address given is the same as the business address for Shaheen Chevrolet (checked with Google).

Page 3, Number: #2 "Terry Kideo" The home address given is the same as the business address for Goodrich Country Club (checked with Google).

Page 3, Number: #3 "Amber Leclcar" The home address given is the same as the business address for Firekeepers Casino (checked with Google).

Page 4, Number: #1 "Michel Aboy-Rjeilch" The home address given is the same as the business address for Medawar Jewelers of Lansing (checked with Google).

Page 4, Number: #2 "Charles Jordan" The home address given is the same as the business address for The Archery Hall of Fame and Museum (checked with Google).

Only the filing's cover page and relevant pages have been enclosed for brevity.

New Section 4, MCFA Sec. 54 Contentions (continued):

2013 Annual Statement, filed January 29, 2014

In-Kind Contributions Section:

Page 1, Number: #1 "April Clobes," The home address given is the same as the business address for MSU-FCU, a credit union.

Page 1, Number: #2 "Ken Haywood," The Okemos, MI address given is the Lansing sales office for the Grand Hotel (checked with Google). The Grand Hotel was a previously admitted to improper corporate in-kind contribution (check reimbursement(s)).

Page 1, Number: #3 "Jason Martinez," The home address given is the same as the business address for Champs, a sports bar. Champs was a previously admitted to improper corporate in-kind contribution (check reimbursement(s)).

Page 2, Number: #1 "Maki Warren," The home address given is the same as the business address for Dan Henry Distributors.

Page 3, Number: #2 "Terry Kideo" The home address given is the same as the business address for Hawk Hallow (checked with Google). Hawk Hallow was a previously admitted to improper corporate in-kind contribution (check reimbursement(s)).

Page 2, Number: #3 "Aaron Newton," The home address given is the same as the business address given for Black Creek, a distributor of parolee tracking systems. Black Creek was a previously admitted to improper corporate in-kind contribution (check reimbursement(s)).

Page 3, Number: #1 "Nathan Collin," The home address given is the same as the business address given for Outback Steakhouse (checked with Google). Outback Steakhouse was a previously admitted to improper corporate in-kind contribution (check reimbursement(s)).

Page 3, Number: #2 "Joshua Barber" The home address given is the same as the business address given for Olive Garden, a family chain restaurant (checked with Google). Olive Garden was a previously admitted to improper corporate in-kind contribution. (check reimbursement(s)).

New Section 4, MCFA Sec. 54 Contentions (continued):

2013 Annual Statement, filed January 29, 2014

In-Kind Contributions Section (continued):

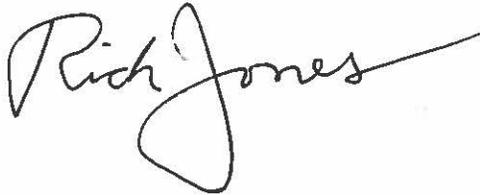
Page 3, Number: #3 "Sarah Serrell" The home address given is the same as the business address given for Home Depot (checked with Google). Home Depot was a previously admitted to improper corporate in-kind contribution (check reimbursement(s)).

Page 4, Number: #1 "Dave Greeley" The home address given is the same as the business address given for Royal Scott Golf and Bowl of Lansing (checked with Google).

Only the filing's cover page and relevant pages have been enclosed for brevity.

NB: The filed 07/19/2013 Campaign Amendment named Theresa O'Dell as the Committee treasurer (enclosed), before the most recent amendment on 8/18/2016 removed her. Theresa O'Dell as the Committee treasurer signed both the October Quarterly 2014 Statement and the 2013 Annual Statement.

Sincerely,

A handwritten signature in black ink that reads "Rick Jones". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

Rick Jones



**CANDIDATE COMMITTEE
COVER PAGE**

FOR OFFICIAL USE ONLY

Report must be legible, typed or printed in ink and signed by the treasurer (or designated record keeper) and candidate.

3. This Statement covers: from 07/21/14 to 10/20/14

1. Committee I.D. Number
029234

2. Committee Name
Committee to Re-Elect Tom Reich for Sheriff

4. Candidate Last Name **Reich** First Name **Thomas** M.I. **L**

4a. Office Sought Including District # or Community Served (If applicable)
Eaton County Sheriff

4b. County of Residence **EATON** STATE of MICHIGAN, COUNTY of EATON

5. Committee's Mailing Address
**1822 Winchester Way
Eaton Rapids, Michigan 48827**

Area Code and Phone (517) 663-8683
If the address in this box is different from the committee mailing address on the Statement of Organization, mail may be sent to this address by the filing official.

6. Treasurer's Name & Residential Address
**Theresa O'Dell
140 Spring
Vermontville, Michigan 49096**

Area Code & Phone (517) 214-2052

FILED
OCT 23 2014
DIANA BOSWORTH
EATON COUNTY CLERK

7. Treasurer's Business Address
**140 Spring
Vermontville, Michigan 49096**

Area Code and Phone (517) 214-2052

8. Designated Record Keeper's Name and Mailing Address (If the committee has a Designated Record Keeper)

Area Code and Phone _____

9. TYPE OF STATEMENT

9a. Pre-Election OR 9b. Post-Election

Pre-Election or Post-Election Statement relates to:

Primary
 General
 Convention
 Special
 School
 Caucus

Date of Election, Convention or Caucus

Required ONLY if candidate is not on the ballot for the current year:

July Quarterly
 October Quarterly

9c. Annual Statement (_____) Coverage Year

9d. Amendment to Campaign Statement (Complete Item 9a, 9b, 9c or 9e to indicate which Statement is being amended.)

9e. Dissolution of Candidate Committee

By checking this item I/We certify any outstanding debt by the committee to the candidate or his or her spouse is here by discharged and forgiven and no longer collectible from the committee. The committee has no outstanding assets, owes no lates fees or has any outstanding debt.

Further, if the dissolution cannot be granted, that this be considered a request for the Reporting Waiver.

Effective date of dissolution

Note: The disposition of residual funds must be reported on Schedule 1B and the Summary Page.

10. Verification: I/We certify that all reasonable diligence was used in the preparation of this statement and attached schedules (if any) and to the best of my/our knowledge and belief the contents are true, accurate and complete.

Current Treasurer or Designated Record Keeper Theresa O'Dell Signature Theresa O'Dell Date 10/23/14

Candidate Thomas L. Reich Signature [Signature] Date 10/23/14



ITEMIZED IN-KIND CONTRIBUTIONS

SCHEDULE 1-IK

1. Committee I. D. Number 029234

CANDIDATE COMMITTEE

2. Committee Name Committee to Re-elect Tom Reich For Sheriff

3. Name and Address from whom received If contribution is from an individual, enter last name first. Check box to indicate if contribution is from a Political Committee or an Independent Committee (Both are commonly called PACs). Report all in-kind contributions.	4. Type of In-Kind Contribution (Check applicable box) 5. Date of Receipt 6. Name & Address of Vendor from whom goods or services were purchased	7. Amount or Fair Market Value	8. Cumulative for Election Cycle (Through date in Item 5)
--	--	--------------------------------	---

Contribution # 1 Name & Address: April Clobes 3777 West East Lansing, MI 48826	4. <input type="checkbox"/> Endorsement or Guarantee of Bank Loan <input checked="" type="checkbox"/> Goods Donated or Loaned <input type="checkbox"/> Services Donated <input type="checkbox"/> Goods or Services Purchased by Candidate or Others <input type="checkbox"/> Goods or Services Purchased by Candidate or Others- LOAN Description <u>Gift Basket</u>	\$ _____ \$ <u>200</u>	
PAC Receipt? <input type="checkbox"/> Yes If over \$100.00 cumulative, please provide: Occupation: <u>Administrator</u> Employer Name & Business Address: MSUFCU 3777 West East Lansing, MI 48826	5. Date Of Receipt: <u>06/05/14</u>	Click Here for Memo Itemization	
<input checked="" type="checkbox"/> Fund Raiser Contribution			

Contribution # 2 Name & Address: Ken Haywood 2177 Common Parkway Okemos, MI 48864	4. <input type="checkbox"/> Endorsement or Guarantee of Bank Loan <input checked="" type="checkbox"/> Goods Donated or Loaned <input type="checkbox"/> Services Donated <input type="checkbox"/> Goods or Services Purchased by Candidate or Others <input type="checkbox"/> Goods or Services Purchased by Candidate or Others- LOAN Description <u>Golf Passes</u>	\$ _____ \$ <u>200</u>	
PAC Receipt? <input type="checkbox"/> Yes If over \$100.00 cumulative, please provide: Occupation: <u>Manager</u> Employer Name & Address: Grand Hotel P.O.Box 286 Mackinaw Island, MI 49757	5. Date Of Receipt: <u>05/22/14</u>	Click Here for Memo Itemization	
<input checked="" type="checkbox"/> Fund Raiser Contribution			

Contribution #3 Name & Address: Warren Maki 5500 Aurelius Lansing, MI 48911	4. <input type="checkbox"/> Endorsement or Guarantee of Bank Loan <input checked="" type="checkbox"/> Goods Donated or Loaned <input type="checkbox"/> Services Donated <input type="checkbox"/> Goods or Services Purchased by Candidate or Others <input type="checkbox"/> Goods or Services Purchased by Candidate or Others- LOAN Description <u>Mirror</u>	\$ _____ \$ <u>75</u>	
PAC Receipt? <input type="checkbox"/> Yes If over \$100.00 cumulative, please provide: Occupation: Employer Name & Address:	5. Date Of Receipt: <u>05/22/14</u>	Click Here for Memo Itemization	
<input checked="" type="checkbox"/> Fund Raiser Contribution			

Page Subtotal	
Grand Total of all Schedules 1-IK (Complete on last page of Schedule)	

Enter this total
on line 6 of Summary
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ITEMIZED IN-KIND CONTRIBUTIONS
SCHEDULE 1-IK

1. Committee I. D. Number 029234

CANDIDATE COMMITTEE

2. Committee Name Committee to Re-elect Tom Reich For Sheriff

3. Name and Address from whom received If contribution is from an individual, enter last name first. Check box to indicate if contribution is from a Political Committee or an Independent Committee (Both are commonly called PACs). Report all in-kind contributions.	4. Type of In-Kind Contribution (Check applicable box) 5. Date of Receipt 6. Name & Address of Vendor from whom goods or services were purchased	7. Amount or Fair Market Value	8. Cumulative for Election Cycle (Through date in Item 5)
Contribution # 1 PAC Receipt? <input type="checkbox"/> Yes Name & Address: Aaron Newton P.O.Box 101747 Irondale,AL 35210 If over \$100.00 cumulative, please provide: Occupation: <u>Administrator</u> Employer Name & Business Address: Black Creek P.O.Box 101747 Irondale,AL 35210 <input checked="" type="checkbox"/> Fund Raiser Contribution	4. <input type="checkbox"/> Endorsement or Guarantee of Bank Loan <input checked="" type="checkbox"/> Goods Donated or Loaned <input type="checkbox"/> Services Donated <input type="checkbox"/> Goods or Services Purchased by Candidate or Others <input type="checkbox"/> Goods or Services Purchased by Candidate or Others- LOAN Description <u>Shirt</u> 5. Date Of Receipt: <u>05/16/14</u> 6. Vendor Name & Address:	\$ _____ \$ <u>250</u>	
Contribution # 2 PAC Receipt? <input type="checkbox"/> Yes Name & Address: Sarah Serrell 936 S.Waverly Lansing,MI 48917 If over \$100.00 cumulative, please provide: Occupation: Employer Name & Address: Home Depot 936 S.Waverly Lansing,MI 48917 <input checked="" type="checkbox"/> Fund Raiser Contribution	4. <input type="checkbox"/> Endorsement or Guarantee of Bank Loan <input checked="" type="checkbox"/> Goods Donated or Loaned <input type="checkbox"/> Services Donated <input type="checkbox"/> Goods or Services Purchased by Candidate or Others <input type="checkbox"/> Goods or Services Purchased by Candidate or Others- LOAN Description <u>Grill/patio set</u> 5. Date Of Receipt: <u>06/03/14</u> 6. Vendor Name & Address:	\$ _____ \$ <u>225</u>	
Contribution #3 PAC Receipt? <input type="checkbox"/> Yes Name & Address: Steve Sharp 183 Washington Sunfield,MI 48890 If over \$100.00 cumulative, please provide: Occupation: <u>District Rep</u> Employer Name & Address: National Wild Turkey Federation 183 Washington Sunfield,MI 48890 <input checked="" type="checkbox"/> Fund Raiser Contribution	4. <input type="checkbox"/> Endorsement or Guarantee of Bank Loan <input checked="" type="checkbox"/> Goods Donated or Loaned <input type="checkbox"/> Services Donated <input type="checkbox"/> Goods or Services Purchased by Candidate or Others <input type="checkbox"/> Goods or Services Purchased by Candidate or Others- LOAN Description <u>Hunting Knives</u> 5. Date Of Receipt: <u>05/22/14</u> 6. Vendor Name & Address:	\$ _____ \$ <u>150</u>	

[Click Here for Memo Itemization](#)

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[Click Here for Memo Itemization](#)

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ITEMIZED IN-KIND CONTRIBUTIONS

SCHEDULE 1-IK

1. Committee I. D. Number 029234

CANDIDATE COMMITTEE

2. Committee Name Committee to Re-elect Tom Reich For Sheriff

3. Name and Address from whom received If contribution is from an individual, enter last name first. Check box to indicate if contribution is from a Political Committee or an Independent Committee (Both are commonly called PACs). Report all in-kind contributions.	4. Type of In-Kind Contribution (Check applicable box) 5. Date of Receipt 6. Name & Address of Vendor from whom goods or services were purchased	7. Amount or Fair Market Value	8. Cumulative for Election Cycle (Through date in Item 5)
Contribution # 1 PAC Receipt? <input type="checkbox"/> Yes Name & Address: Ralph Shaheen 632 American Lansing, MI 48911 If over \$100.00 cumulative, please provide: Occupation: Employer Name & Business Address:	4. <input type="checkbox"/> Endorsement or Guarantee of Bank Loan <input checked="" type="checkbox"/> Goods Donated or Loaned <input type="checkbox"/> Services Donated <input type="checkbox"/> Goods or Services Purchased by Candidate or Others <input type="checkbox"/> Goods or Services Purchased by Candidate or Others- LOAN Description <u>Oil Change</u> 5. Date Of Receipt: <u>06/04/14</u> 6. Vendor Name & Address:	\$ _____ \$ <u>100</u>	
Click Here for Memo Itemization			
<input checked="" type="checkbox"/> Fund Raiser Contribution			
Contribution # 2 PAC Receipt? <input type="checkbox"/> Yes Name & Address: Terry Kildeo P.O.Box 307 Beth, MI 48808 If over \$100.00 cumulative, please provide: Occupation: Employer Name & Address:	4. <input type="checkbox"/> Endorsement or Guarantee of Bank Loan <input checked="" type="checkbox"/> Goods Donated or Loaned <input type="checkbox"/> Services Donated <input type="checkbox"/> Goods or Services Purchased by Candidate or Others <input type="checkbox"/> Goods or Services Purchased by Candidate or Others- LOAN Description <u>Gift Certificate</u> 5. Date Of Receipt: _____ 6. Vendor Name & Address:	\$ _____ \$ <u>50</u>	
Click Here for Memo Itemization			
<input checked="" type="checkbox"/> Fund Raiser Contribution			
Contribution #3 PAC Receipt? <input type="checkbox"/> Yes Name & Address: Amber Leclcar 11177 Michigan Ave Battle Creek, MI 49014 If over \$100.00 cumulative, please provide: Occupation: Employer Name & Address:	4. <input type="checkbox"/> Endorsement or Guarantee of Bank Loan <input checked="" type="checkbox"/> Goods Donated or Loaned <input type="checkbox"/> Services Donated <input type="checkbox"/> Goods or Services Purchased by Candidate or Others <input type="checkbox"/> Goods or Services Purchased by Candidate or Others- LOAN Description <u>Gift Certificate</u> 5. Date Of Receipt: _____ 6. Vendor Name & Address:	\$ _____ \$ <u>100</u>	
Click Here for Memo Itemization			
<input checked="" type="checkbox"/> Fund Raiser Contribution			

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**ITEMIZED IN-KIND CONTRIBUTIONS
SCHEDULE 1-IK**

1. Committee I. D. Number 029234
2. Committee Name Committee to Re-elect Tom Reich For Sheriff

CANDIDATE COMMITTEE

3. Name and Address from whom received If contribution is from an individual, enter last name first. Check box to indicate if contribution is from a Political Committee or an Independent Committee (Both are commonly called PACs). Report all in-kind contributions.	4. Type of In-Kind Contribution (Check applicable box)	7. Amount or Fair Market Value	8. Cumulative for Election Cycle (Through date in Item 5)
Contribution # 1 PAC Receipt? <input type="checkbox"/> Yes Name & Address: Michel Aboy-Rjeilch 6145 W.Saginaw Lansing, MI 48917 If over \$100.00 cumulative, please provide: Occupation: Employer Name & Business Address:	4. <input type="checkbox"/> Endorsement or Guarantee of Bank Loan <input checked="" type="checkbox"/> Goods Donated or Loaned <input type="checkbox"/> Services Donated <input type="checkbox"/> Goods or Services Purchased by Candidate or Others <input type="checkbox"/> Goods or Services Purchased by Candidate or Others- LOAN Description <u>Bracelet</u>	\$ _____ \$ <u>50</u>	
5. Date Of Receipt: <u>05/12/14</u> 6. Vendor Name & Address:			
Click Here for Memo Itemization			
<input checked="" type="checkbox"/> Fund Raiser Contribution			
Contribution # 2 PAC Receipt? <input type="checkbox"/> Yes Name & Address: Charles Jordan 2286 Bachman Hastings, MI 49058 If over \$100.00 cumulative, please provide: Occupation: Employer Name & Address:	4. <input type="checkbox"/> Endorsement or Guarantee of Bank Loan <input checked="" type="checkbox"/> Goods Donated or Loaned <input type="checkbox"/> Services Donated <input type="checkbox"/> Goods or Services Purchased by Candidate or Others <input type="checkbox"/> Goods or Services Purchased by Candidate or Others- LOAN Description <u>Hats-Quiver</u>	\$ _____ \$ <u>75</u>	
5. Date Of Receipt: <u>05/22/14</u> 6. Vendor Name & Address:			
Click Here for Memo Itemization			
<input checked="" type="checkbox"/> Fund Raiser Contribution			
Contribution #3 PAC Receipt? <input type="checkbox"/> Yes Name & Address: Jack Turner N.Cochran Charlotte, MI 48813 If over \$100.00 cumulative, please provide: Occupation: <u>Self-Employed</u> Employer Name & Address: Traditional Tree Stands Cochran Charlotte, MI 48813	4. <input type="checkbox"/> Endorsement or Guarantee of Bank Loan <input checked="" type="checkbox"/> Goods Donated or Loaned <input type="checkbox"/> Services Donated <input type="checkbox"/> Goods or Services Purchased by Candidate or Others <input type="checkbox"/> Goods or Services Purchased by Candidate or Others- LOAN Description <u>Tree Stand</u>	\$ _____ \$ <u>150</u>	
5. Date Of Receipt: <u>05/24/14</u> 6. Vendor Name & Address:			
Click Here for Memo Itemization			
<input checked="" type="checkbox"/> Fund Raiser Contribution			

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**ITEMIZED IN-KIND CONTRIBUTIONS
SCHEDULE 1-IK**

1. Committee I. D. Number 029234

CANDIDATE COMMITTEE

2. Committee Name Committee to Re-elect Tom Reich For Sheriff

3. Name and Address from whom received If contribution is from an individual, enter last name first. Check box to indicate if contribution is from a Political Committee or an Independent Committee (Both are commonly called PACs). Report all in-kind contributions.	4. Type of In-Kind Contribution (Check applicable box)	7. Amount or Fair Market Value	8. Cumulative for Election Cycle (Through date in Item 5)
Contribution # 1 PAC Receipt? <input type="checkbox"/> Yes Name & Address: Ken McCoy 848 Blacksmith Trail Williamston, MI 48895 If over \$100.00 cumulative, please provide: Occupation: <u>Law Enforcement</u> Employer Name & Business Address: ECSO 1025 Independence Charlotte, MI 48813 <input checked="" type="checkbox"/> Fund Raiser Contribution	4. <input type="checkbox"/> Endorsement or Guarantee of Bank Loan <input checked="" type="checkbox"/> Goods Donated or Loaned <input type="checkbox"/> Services Donated <input type="checkbox"/> Goods or Services Purchased by Candidate or Others <input type="checkbox"/> Goods or Services Purchased by Candidate or Others- LOAN Description <u>Gift Certificates</u>	\$ _____ \$ 710	
Contribution # 2 PAC Receipt? <input type="checkbox"/> Yes Name & Address: If over \$100.00 cumulative, please provide: Occupation: Employer Name & Address: <input type="checkbox"/> Fund Raiser Contribution	4. <input type="checkbox"/> Endorsement or Guarantee of Bank Loan <input type="checkbox"/> Goods Donated or Loaned <input type="checkbox"/> Services Donated <input type="checkbox"/> Goods or Services Purchased by Candidate or Others <input type="checkbox"/> Goods or Services Purchased by Candidate or Others- LOAN Description _____	\$ _____ \$ _____	
Contribution #3 PAC Receipt? <input type="checkbox"/> Yes Name & Address: If over \$100.00 cumulative, please provide: Occupation: Employer Name & Address: <input type="checkbox"/> Fund Raiser Contribution	4. <input type="checkbox"/> Endorsement or Guarantee of Bank Loan <input type="checkbox"/> Goods Donated or Loaned <input type="checkbox"/> Services Donated <input type="checkbox"/> Goods or Services Purchased by Candidate or Others <input type="checkbox"/> Goods or Services Purchased by Candidate or Others- LOAN Description _____	\$ _____ \$ _____	

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**CANDIDATE COMMITTEE
COVER PAGE**

JAN 29 2014

FOR OFFICIAL USE ONLY

Report must be legible, typed or printed in ink and signed by the treasurer (or designated record keeper) and candidate.

DIANA BOSWORTH

EATON COUNTY CLERK

<p>1. Committee I.D. Number <u>029234</u></p>	<p>3. This Statement covers From: <u>01/01/13</u> to <u>12/31/13</u></p>
<p>2. Committee Name <u>Committee to Re-Elect Tom Reich for Sheriff</u></p>	<p>4. Candidate Last Name <u>REICH</u> First Name <u>Thomas</u> M.I. <u>L.</u></p>
<p>5. Committee's Mailing Address <u>1822 Winchester way Eaton Rapids, MI 48827</u> Area Code and Phone <u>(517) 663-8683</u> <small>If the address in this box is different from the committee mailing address on the Statement of Organization, mail may be sent to this address by the filing official.</small></p>	<p>4a. Office Sought Including District # or Community Served (if applicable) <u>Sheriff of Eaton County</u></p> <p>4b. County of Residence <u>Eaton</u></p>
<p>7. Treasurer's Business Address <u>140 Spring Vermontville, MI 49096</u> Area Code and Phone <u>(517) 726-1009</u></p>	<p>6. Treasurer's Name & Residential Address <u>Theresa O'dell 140 Spring St. Vermontville, MI 49096</u> Area Code & Phone <u>(517) 726-1009</u></p>
	<p>8. Designated Record keeper's Name and Mailing Address (if the committee has a Designated Record keeper) <u>N/A</u> Area Code and Phone _____</p>

9. TYPE OF STATEMENT

9a. Pre-Election OR 9b. Post-Election

9c. Annual Statement (2013 Coverage Year)

9d. Amendment to Campaign Statement (Completes Item 9a, 9b, 9c or 9e to indicate which Statement is being amended)

9e. Dissolution of Candidate Committee

Effective Date of Dissolution _____

By checking this item, I/We certify that the committee has no assets or outstanding debts, including late filing fees. Further, I/We request that if the dissolution cannot be granted, that this be considered a request for the Reporting Waiver.

Note: The disposition of residual funds must be reported on Schedule 1B and the Summary Page.

A committee that does not have a Reporting Waiver must file all required Campaign Statements. The Campaign Statements must include all applicable Schedules. Direct contributions, in-kind contributions, loans, expenditures, and outstanding debts count against the \$1,000 Reporting Waiver threshold. If any of the information listed in Items 2, 4, 5, 6, 7, or 8 has changed since the information was shown on the committee's Statement of Organization, an amendment to the Statement of Organization should accompany this Campaign Statement. If a request for a Reporting Waiver is not received on or before the filing deadline of a required campaign statement, that campaign statement cannot be waived.

0. Verification: I/We certify that all reasonable diligence was used in the preparation of this statement and attached schedules (if any) and to the best of my/our knowledge and belief the contents are true, accurate and complete.

Current Treasurer or Designated Record Keeper Theresa O'dell Type or Print Name Theresa O'dell Signature Date 1/27/14

Candidate Thomas L. Reich Type or Print Name Thomas Reich Signature Date 1-18-14



ITEMIZED IN-KIND CONTRIBUTIONS

SCHEDULE 1-IK

CANDIDATE COMMITTEE

1. Committee I. D. Number 029234

2. Committee Name Committee to Re-Elect Tom Reich for Sheriff

3. Name and Address from whom received If contribution is from an individual, enter last name first. Check box to indicate if contribution is from a Political Committee or an Independent Committee (Both are commonly called PACs). Report all in-kind contributions.	4. Type of In-Kind Contribution (Check applicable box)	7. Amount or Fair Market Value	8. Cumulative for Election Cycle (Through date in item 5)
--	--	--------------------------------	---

Contribution #1 PAC Receipt? <input type="checkbox"/> Yes	4. <input type="checkbox"/> Endorsement or Guarantee of Bank Loan		
Name & Address: <u>April Clobes</u> <u>3777 west</u> <u>East Lansing, MI 48826</u>	<input checked="" type="checkbox"/> Goods Donated or Loaned <input type="checkbox"/> Services Donated	<u>\$100⁰⁰</u>	<u>\$100⁰⁰</u>
If over \$100.00 cumulative, please provide: Occupation: <u>MANAGER</u>	<input type="checkbox"/> Goods or Services Purchased by Candidate or Others		
Employer Name & Business Address: <u>MSU FCU</u> <u>3777 west</u> <u>East Lansing, MI 48826</u>	<input type="checkbox"/> Goods or Services Purchased by Candidate or Others- LOAN		
<input checked="" type="checkbox"/> Fund Raiser Contribution	Description <u>MSU GIFT BASKET</u>		
	5. Date Of Receipt: <u>5-17-13</u>		
	6. Vendor Name & Address:		Click Here for Memo Itemization

Contribution #2 PAC Receipt? <input type="checkbox"/> Yes	4. <input type="checkbox"/> Endorsement or Guarantee of Bank Loan		
Name & Address: <u>Ken Hayward</u> <u>2177 Commons Parkways</u> <u>Oakemos, MI 48864</u>	<input checked="" type="checkbox"/> Goods Donated or Loaned <input type="checkbox"/> Services Donated	<u>\$100⁰⁰</u>	<u>\$100⁰⁰</u>
If over \$100.00 cumulative, please provide: Occupation:	<input type="checkbox"/> Goods or Services Purchased by Candidate or Others		
Employer Name & Address: <u>Grand Hotel</u> <u>P.O. Box 286</u> <u>MacKinnaw Island, MI 49757</u>	<input type="checkbox"/> Goods or Services Purchased by Candidate or Others- LOAN		
<input checked="" type="checkbox"/> Fund Raiser Contribution	Description <u>GOLF PASSES</u>		
	5. Date Of Receipt: <u>4-11-13</u>		
	6. Vendor Name & Address:		Click Here for Memo Itemization

Contribution #3 PAC Receipt? <input type="checkbox"/> Yes	4. <input type="checkbox"/> Endorsement or Guarantee of Bank Loan		
Name & Address: <u>Jason Martinez</u> <u>2800 Freyde</u> <u>Lansing, MI 48912</u>	<input checked="" type="checkbox"/> Goods Donated or Loaned <input type="checkbox"/> Services Donated	<u>\$25⁰⁰</u>	<u>\$25⁰⁰</u>
If over \$100.00 cumulative, please provide: Occupation: <u>Manager</u>	<input type="checkbox"/> Goods or Services Purchased by Candidate or Others		
Employer Name & Address: <u>Champs</u> <u>2800 Freyde</u> <u>Lansing, MI 48912</u>	<input type="checkbox"/> Goods or Services Purchased by Candidate or Others- LOAN		
<input checked="" type="checkbox"/> Fund Raiser Contribution	Description <u>GIFT CARD TO CHAMPS</u>		
	5. Date Of Receipt: <u>6-12-13</u>		
	6. Vendor Name & Address:		Click Here for Memo Itemization

Page Subtotal 225⁰⁰

Grand Total of all Schedules 1-IK
(Complete on last page of Schedule)

<u>225⁰⁰</u>

Enter this total on line 6 of Summary Page



ITEMIZED IN-KIND CONTRIBUTIONS
SCHEDULE 1-IK

1. Committee I. D. Number 029234
2. Committee Name Committee to re-elect Tom Peich For Sheriff

CANDIDATE COMMITTEE

3. Name and Address from whom received If contribution is from an individual, enter last name first. Check box to indicate if contribution is from a Political Committee or an Independent Committee (Both are commonly called PACs). Report all in-kind contributions.	4. Type of In-Kind Contribution (Check applicable box)	7. Amount or Fair Market Value	8. Cumulative for Election Cycle (Through date in Item 5)
Contribution #4 PAC Receipt? <input type="checkbox"/> Yes Name & Address: <u>Warren Mark</u> <u>5500 Aurelius</u> <u>Lansing, MI 48211</u> If over \$100.00 cumulative, please provide: Occupation: <u>MANAGER</u> Employer Name & Business Address: <u>DAN Henry</u> <u>5500 Aurelius</u> <u>Lansing, MI 48211</u>	4. <input type="checkbox"/> Endorsement or Guarantee of Bank Loan <input checked="" type="checkbox"/> Goods Donated or Loaned <input type="checkbox"/> Services Donated <input type="checkbox"/> Goods or Services Purchased by Candidate or Others <input type="checkbox"/> Goods or Services Purchased by Candidate or Others- LOAN	<u>\$50.00</u>	<u>\$50.00</u>
Description <u>DETROIT TIGER MIRROR</u>		5. Date Of Receipt: <u>6-12-13</u>	
6. Vendor Name & Address:		Click Here for Memo Itemization	
<input checked="" type="checkbox"/> Fund Raiser Contribution			
Contribution #5 PAC Receipt? <input type="checkbox"/> Yes Name & Address: <u>Terry Kildes</u> <u>15101 S. CHANDLER</u> <u>BATH, MI 48804</u> If over \$100.00 cumulative, please provide: Occupation: <u>MANAGER</u> Employer Name & Address: <u>HAWK HOLLOW</u> <u>15101 S. CHANDLER</u> <u>BATH, MI 48804</u>	4. <input type="checkbox"/> Endorsement or Guarantee of Bank Loan <input checked="" type="checkbox"/> Goods Donated or Loaned <input type="checkbox"/> Services Donated <input type="checkbox"/> Goods or Services Purchased by Candidate or Others <input type="checkbox"/> Goods or Services Purchased by Candidate or Others- LOAN	<u>\$100.00</u>	<u>\$100.00</u>
Description <u>GOLF PASS</u>		5. Date Of Receipt: <u>6-12-13</u>	
6. Vendor Name & Address:		Click Here for Memo Itemization	
<input checked="" type="checkbox"/> Fund Raiser Contribution			
Contribution #6 PAC Receipt? <input type="checkbox"/> Yes Name & Address: <u>Aaron Newton</u> <u>Rd. Box 101747</u> <u>Irondale, AL 35210</u> If over \$100.00 cumulative, please provide: Occupation: <u>owner</u> Employer Name & Address: <u>BLACK CREEK</u> <u>P.O. Box 101747</u> <u>Irondale, MI 35210</u>	4. <input type="checkbox"/> Endorsement or Guarantee of Bank Loan <input checked="" type="checkbox"/> Goods Donated or Loaned <input type="checkbox"/> Services Donated <input type="checkbox"/> Goods or Services Purchased by Candidate or Others <input type="checkbox"/> Goods or Services Purchased by Candidate or Others- LOAN	<u>\$100.00</u>	<u>\$100.00</u>
Description <u>shirt</u>		5. Date Of Receipt: <u>6-12-13</u>	
6. Vendor Name & Address:		Click Here for Memo Itemization	
<input type="checkbox"/> Fund Raiser Contribution			

Page Subtotal 250.00

Grand Total of all Schedules 1-IK
(Complete on last page of Schedule)

Enter this total
on line 8 of Summary
Page



**ITEMIZED IN-KIND CONTRIBUTIONS
SCHEDULE 1-IK**

1. Committee I. D. Number 029234

CANDIDATE COMMITTEE

2. Committee Name Committee to re-elect Tom Reich Gov. Sher. H

3. Name and Address from whom received If contribution is from an individual, enter last name first. Check box to indicate if contribution is from a Political Committee or an Independent Committee (Both are commonly called PACs). Report all in-kind contributions.	4. Type of In-Kind Contribution (Check applicable box)	7. Amount or Fair Market Value	8. Cumulative for Election Cycle (Through date in Item 5)
Contribution #7 PAC Receipt? <input type="checkbox"/> Yes Name & Address: <u>NATHAN COLLIN</u> <u>707 Brookside</u> <u>Lansing, MI 48917</u> If over \$100.00 cumulative, please provide: Occupation: Employer Name & Business Address:	4. <input type="checkbox"/> Endorsement or Guarantee of Bank Loan <input checked="" type="checkbox"/> Goods Donated or Loaned <input type="checkbox"/> Services Donated <input type="checkbox"/> Goods or Services Purchased by Candidate or Others <input type="checkbox"/> Goods or Services Purchased by Candidate or Others- LOAN Description <u>Gift card</u>	<u>\$20⁰⁰</u>	<u>\$20⁰⁰</u>
<input checked="" type="checkbox"/> Fund Raiser Contribution Contribution #8 PAC Receipt? <input type="checkbox"/> Yes Name & Address: <u>JOSHUA BARBER</u> <u>5015 Marsh</u> <u>Okemos, MI 48864</u> If over \$100.00 cumulative, please provide: Occupation: Employer Name & Address:	4. <input type="checkbox"/> Endorsement or Guarantee of Bank Loan <input checked="" type="checkbox"/> Goods Donated or Loaned <input type="checkbox"/> Services Donated <input type="checkbox"/> Goods or Services Purchased by Candidate or Others <input type="checkbox"/> Goods or Services Purchased by Candidate or Others- LOAN Description <u>Gift certificate</u>	<u>\$20⁰⁰</u>	<u>\$20⁰⁰</u>
<input checked="" type="checkbox"/> Fund Raiser Contribution Contribution #9 PAC Receipt? <input type="checkbox"/> Yes Name & Address: <u>SARAH SOVELL</u> <u>936 S. Wewerly</u> <u>Lansing, MI 48917</u> If over \$100.00 cumulative, please provide: Occupation: Employer Name & Address:	4. <input type="checkbox"/> Endorsement or Guarantee of Bank Loan <input checked="" type="checkbox"/> Goods Donated or Loaned <input type="checkbox"/> Services Donated <input type="checkbox"/> Goods or Services Purchased by Candidate or Others <input type="checkbox"/> Goods or Services Purchased by Candidate or Others- LOAN Description <u>grill, charcoal</u>	<u>\$75⁰⁰</u>	<u>\$75⁰⁰</u>

Click Here for Memo Itemization

Click Here for Memo Itemization

Click Here for Memo Itemization

Page Subtotal

115⁰⁰

Grand Total of all Schedules 1-IK
(Complete on last page of Schedule)

Enter this total
on line 8 of Summary
Page



ITEMIZED IN-KIND CONTRIBUTIONS
SCHEDULE 1-IK

1. Committee I. D. Number 029234

CANDIDATE COMMITTEE

2. Committee Name Committee to re-elect Tom Reich For Sheriff

3. Name and Address from whom received If contribution is from an individual, enter last name first. Check box to indicate if contribution is from a Political Committee or an Independent Committee (Both are commonly called PACs). Report all in-kind contributions.	4. Type of In-Kind Contribution (Check applicable box)	7. Amount or Fair Market Value	8. Cumulative for Election Cycle (Through date in Item 5)
Contribution # <u>0</u> PAC Receipt? <input type="checkbox"/> Yes Name & Address: <u>DAVE Greeley</u> <u>4722 W. Grand River</u> <u>Lansing, MI 48906</u> If over \$100.00 cumulative, please provide: Occupation: Employer Name & Business Address:	4. <input type="checkbox"/> Endorsement or Guarantee of Bank Loan <input checked="" type="checkbox"/> Goods Donated or Loaned <input type="checkbox"/> Services Donated <input type="checkbox"/> Goods or Services Purchased by Candidate or Others <input type="checkbox"/> Goods or Services Purchased by Candidate or Others- LOAN Description <u>GIFT Certificate</u> 5. Date Of Receipt: <u>6-12-13</u> 6. Vendor Name & Address:	<u>\$100⁰⁰</u>	<u>\$100⁰⁰</u> Click Here for Memo Itemization
<input checked="" type="checkbox"/> Fund Raiser Contribution Contribution # <u>1</u> PAC Receipt? <input type="checkbox"/> Yes Name & Address: <u>Steve Sharp</u> <u>183 W. Washington</u> <u>Sunfield, MI 48320</u> If over \$100.00 cumulative, please provide: Occupation: <u>Regional Director</u> Employer Name & Address:	4. <input type="checkbox"/> Endorsement or Guarantee of Bank Loan <input checked="" type="checkbox"/> Goods Donated or Loaned <input type="checkbox"/> Services Donated <input type="checkbox"/> Goods or Services Purchased by Candidate or Others <input type="checkbox"/> Goods or Services Purchased by Candidate or Others- LOAN Description <u>BUFFALO ART</u> 5. Date Of Receipt: <u>6-12-13</u> 6. Vendor Name & Address:	<u>\$100⁰⁰</u>	<u>\$100⁰⁰</u> Click Here for Memo Itemization
<input checked="" type="checkbox"/> Fund Raiser Contribution Contribution # <u>2</u> PAC Receipt? <input type="checkbox"/> Yes Name & Address: <u>Ken Mcloy</u> If over \$100.00 cumulative, please provide: Occupation: <u>Law Enforcement</u> Employer Name & Address: <u>Eaton Co. Sheriff</u> <u>1025 Independence</u> <u>Charlotte, MI 48813</u>	4. <input type="checkbox"/> Endorsement or Guarantee of Bank Loan <input checked="" type="checkbox"/> Goods Donated or Loaned <input type="checkbox"/> Services Donated <input type="checkbox"/> Goods or Services Purchased by Candidate or Others <input type="checkbox"/> Goods or Services Purchased by Candidate or Others- LOAN Description <u>GIFT cards</u> 5. Date Of Receipt: <u>6-12-13</u> 6. Vendor Name & Address:	<u>\$150⁰⁰</u>	<u>\$225⁰⁰</u> Click Here for Memo Itemization

Page Subtotal

350⁰⁰

Grand Total of all Schedules 1-IK
(Completes on last page of Schedule)

940⁰⁰

Enter this total
on line 6 of Summary
Page



ORIGINAL OR AMENDED

STATEMENT OF ORGANIZATION FORM FOR CANDIDATE COMMITTEES

1. Committee ID #: 29234

2. Type of Filing:
 Original
 Amendment to Items: 8 Eff. Date: 7-19-13

3. Full Name of Committee (must include Candidate's first and last name): Committee to Reelect Tom Reich Sheriff

4a. Candidate Full Name (Last, First, M.I.):
Thomas Reich

4b. Political Party (If applicable):

4c. County of Residence: Eaton

4d. Office Sought (Check one):

<input type="checkbox"/> Governor	<input type="checkbox"/> Lt. Governor	<input type="checkbox"/> State Senator
<input type="checkbox"/> State Rep.	<input type="checkbox"/> Sec. of State	<input type="checkbox"/> Attorney Gen.
<input type="checkbox"/> State Bd. of Ed.	<input type="checkbox"/> UofM Reg.	<input type="checkbox"/> MSU Trustee
<input type="checkbox"/> WSU Gov.	<input type="checkbox"/> Supreme Court	<input type="checkbox"/> Appeals Court
<input type="checkbox"/> Circuit Court	<input type="checkbox"/> District Court	<input type="checkbox"/> Probate Court
<input type="checkbox"/> Municipal Court		

Local or other please specify:

4e. District/Circuit # or Jurisdiction:

5. Date Committee was Formed: _____

6a. Committee Phone #: _____

6b. Committee Fax #: _____

6c. Committee E-mail Address: _____

6d. Committee Website Address: _____

7a. Complete Comm. Mailing Address (May be PO Box):

7b. Complete Comm. Street Address (May not be PO Box):

8. Treasurer Name and Complete Address:
Theresa O'Dell
140 Spring St
Vermontville MI 49096

Phone #: (517) 726-1009

E-mail Address: treeodell@gmail.com

9. Designated Record Keeper Name and Complete Address:

Phone #: _____

E-mail Address: _____

10. REPORTING WAIVER REQUEST: If the committee does not expect to receive or expend in excess of \$1,000 in an election and checks this box, the filing requirement of pre, post and annual campaign statements is waived. The Reporting Waiver will be automatically lost if the committee exceeds the \$1,000 threshold.

11. Name and Address of Depositories or Intended Depositories of committee funds. (Michigan Bank, Credit Union or Savings & Loan Association)

a. Official Depository
 STATE of MICHIGAN, COUNTY of EATON
FILED
 JUL 19 2013
DIANA BOSWORTH
 EATON COUNTY CLERK

b. Secondary Depository

12. This item applies only to *Gubernatorial Candidate Committees*: Check if this committee intends to seek qualifying contributions or make qualifying expenditures.

13. ELECTRONIC FILING: This item applies to committees that file with the Michigan Department of State Bureau of Elections only and does not apply to Candidate Committees that file with the County Clerk's office.

The Campaign Finance Act requires any committee that files with the Secretary of State and spends or receives \$20,000 in the preceding calendar year OR expects to spend or receive \$20,000 in the current calendar year to file campaign statements electronically. MERTS Plus software is provided to you free of charge to assist you in meeting this requirement.

Committee spent or received or expects to spend or receive in excess of \$20,000 and is required to file electronically.

** OR **

Committee did not spend or receive or does not expect to spend or receive in excess of \$20,000 and would like to file electronically voluntarily.

14. Verification: I/We certify that all reasonable diligence was used in the preparation of the above statement and that the contents are true, accurate and complete to the best of my/our knowledge or belief. If filing electronically, we further agree that the signatures below shall serve as the signatures that verify the accuracy and completeness of each statement filed electronically by the committee. I/We certify that all reasonable diligence will be used in the preparation of each statement electronically filed by this committee and that the contents of each statement will be true, accurate and complete to the best of my/our knowledge or belief. (Sign Name and Date)

Thomas Reich 7-19-13
 Candidate

Theresa O'Dell 7-19-13
 Current Treasurer

.....
 Designated Record Keeper (Required only if filing electronically)

CAMPAIGN FINANCE SERVICES

Brett J. McRae, Attorney at Law

403 West Fourth Street, Charlotte, Michigan 48813

Phone: (517) 543-4278 Fax: (270) 682-4528

brettmrae@sbeGLOBAL.net



September 23, 2016

Ms. Lori A. Bourbonais
Bureau of Elections
430 West Allegan Street
Lansing, Michigan 48909

Dear Ms. Bourbonais:

The following constitutes the response of the Committee to Reelect Tom Reich for Sheriff to Rick Jones' Rebuttal Statement dated September 4, 2016:

1. Rick Jones' Rebuttal Statement includes new allegations which are required to be filed as new and separate complaints.
2. The new allegations are not supported by a Certification Statement, and hence are null and void.
3. The Michigan Campaign Finance Act provides that it is a civil offense to file a complaint with a false Certification Statement.

Thank you for your consideration of this matter.

Sincerely,

Brett J. McRae (P41336)
Attorney for Respondent

RECEIVED/FILED
MICHIGAN DEPT OF STATE
ELECTIONS/SECRET SEAL
2016 SEP 27 AM 10:11



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

November 17, 2016

Brett McRae
Campaign Finance Services
403 West Fourth Street
Charlotte, Michigan 48813

Dear Mr. McRae:

The Department of State (Department) has completed its initial investigation of the complaint filed against The Committee to Re-Elect Tom Reich for Sheriff (Committee) by Senator Rick Jones, which alleged certain violations of the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.201 *et seq.* This letter concerns the disposition of Sen. Jones' complaint.

Sen. Jones filed his complaint on July 29, 2016. Written responses were filed on August 23, 2016 and August 26, 2016. Sen. Jones filed a rebuttal statement on September 6, 2016.

The MCFA requires filed campaign finance statements and reports to be complete and accurate. MCL 169.233. A candidate who knowingly files an incomplete or inaccurate statement or report may be subject to a civil fine of up to \$1,000.00. MCL 169.233(10).

The MCFA also prohibits a corporation or labor organization from making a contribution to a committee other than a ballot question committee. MCL 169.254. A knowing violation of this section is a felony, punishable by a fine of not more than \$5,000.00 or imprisonment. MCL 169.254(4). Additionally, Michigan Administrative Rule 169.35 prohibits the treasurer of a committee, other than a ballot question committee, from accepting a contribution written on a check from a corporate account. A person who accepts an improper contribution may be subject to a civil fine of up to \$1,000.00 per violation plus triple the amount of each improper contribution. MCL 169.215(11).

Finally, the Act 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, and if the Department is unable to correct or prevent additional violations, it must ask the Attorney General to prosecute if a crime has been committed or conduct an administrative hearing for enforcement of a civil violation. MCL 169.215(10)(a), (b). The objective of an informal resolution is "to correct the violation or prevent a further violation [,]" *Id.*

Sen. Jones alleged the Committee filed incomplete or inaccurate statements by failing to provide contributor addresses, occupations, or employer names and addresses on the Committee's 2015

July Quarterly and 2016 Pre-Election campaign finance statements. Sen. Jones provided copies of these statements as evidence to support his allegations.

In the first response to the complaint, Sheriff Reich admitted that the omission of the addresses, occupations, and employer names and addresses were a “clerical error and oversi[ght].” A review of the Committee’s 2015 July Quarterly and 2016 Pre-Primary campaign statements confirm that there are multiple incomplete contributor entries. In the second response to the complaint, you indicated that the Committee has retained you as the new treasurer for the Committee and that you will be “reviewing the [C]ommittee’s past and future transactions carefully to ensure” compliance with the Act.

In addition, Sen. Jones alleged, and a review of the Committee’s 2016 Pre-Primary Statement confirms, that a contribution on page 26 of the contribution schedule was labeled “Miscellaneous Internet Receipts.” No contributor information is provided. If this information cannot be provided, it must be noted that the MCFA prohibits a committee from accepting an anonymous contribution. MCL 169.241(2). A knowing violation of section 41 of the Act is a misdemeanor, punishable by a fine, imprisonment, or both.

Sen. Jones further alleged that the Committee accepted 80 prohibited corporate contributions as reported on the Committee’s 2015 July Quarterly and 2016 Pre-Primary campaign statements, along with prohibited contributions from the Detroit Lions and Centennial Acres. Sen. Jones provided a printout of a page from the Detroit Lions website indicating that the Lions accept donation requests and a printout from the Committee’s fundraiser website which states that the Sheriff Tom Reich Golf Outing held on June 24, 2016 was sponsored by Centennial Acres.

In the first response to the complaint, Sheriff Reich explained that a signed Detroit Lions football was contributed to the Committee by an individual and not the Lions organization. In the absence of any evidence to the contrary, the Department believes this is plausible and accepts Sheriff Reich’s explanation. Additionally, Sheriff Reich indicated that Centennial Acres was paid in full for the golf outing at the same pricing as available to the general public. Sheriff Reich asserted that Centennial Acres was not a sponsor to a golf outing. The Committee reported a payment of \$3,848.00 to Centennial Acres on its 2016 Pre-Primary statement, which appears to support Sheriff Reich’s assertion. It appears to the Department that while it is unfortunate that the Committee’s fundraiser website stated Centennial Acres was a “sponsor,” the evidence provided does not support a conclusion that the Committee received a prohibited contribution from Centennial Acres.

In the second response you stated that, “the Committee has already acted to refund the full value of the corporate in-kind contributions.” You provided a sample letter that was mailed with the refunds, along with copies of the refund checks.

It appears to the Department from your response that 69 refund checks were issued by the Committee totaling \$4,009.00.¹ However, it appears to the Department that the following 12

¹ This total includes a refund check written to Michigan State University in the amount of \$150.00. The Department notes that Sen. Jones also alleged that Sheriff Reich violated section 57 of the MCFA by accepting a \$150.00 contribution from a Michigan State University. However, the Department dismissed this allegation for

contributions reported by the Committee are from corporations and were not accounted for in the copies of checks you provided:

Statement	Contributor	Date	Amount
2016 Pre-Primary	Mid Michigan Emergency Equipment	6/24/16	\$60.00
2016 Pre-Primary	Family Tradition Treestands	6/24/16	\$150.00
2016 Pre-Primary	The Jewel Golf at Mackinac	6/24/16	\$300.00
2016 Pre-Primary	City Limits	6/24/16	\$60.00
2015 July Quarterly	Meyers Plumbing & Heating	6/27/15	\$100.00
2015 July Quarterly	Dean Trailways	6/27/15	\$100.00
2015 July Quarterly	Mid Michigan Emergency Equipment	6/27/15	\$100.00
2015 July Quarterly	City Limits	6/27/15	\$20.00
2015 July Quarterly	Maple Brook Golf Club	6/27/15	\$150.00
2015 July Quarterly	Pro Golf	6/27/15	\$114.00
2015 July Quarterly	MSU Federal Credit Union	6/27/15	\$65.00
2015 July Quarterly	Family Traditions	6/27/15	\$90.00
Total Contributions			\$1,309.00

The Department further notes that Sen. Jones alleged in his rebuttal statement that the Committee reported corporate contributions on its 2014 October Quarterly Statement and 2014 Annual Statement. Sen. Jones based his allegations on the fact that the listed contributors' addresses were addresses of corporations.

Based on the admissions that the Committee failed to include required information on its 2015 July Quarterly and 2016 Pre-Primary campaign statements and that it accepted prohibited corporate contributions, along with the Department's review of the Committee's campaign statements, the Department concludes that the evidence supports a reason to believe the Committee has violated the Act. Upon making this determination the Department is required by law to attempt to resolve the matter informally. MCL 169.215(10).

Please provide the following to the Department no later than December 11, 2016:

- 1. Detailed contributor information for the contribution listed as "Miscellaneous Internet Receipts" on the Committee's 2016 Pre-Primary statement.**
- 2. An explanation as to why the contributions listed in the above table are not corporate contributions; or if they were prohibited corporate contributions, proof that the Committee has refunded the contributions.**
- 3. Proof that the contributions listed in Sen. Jones' rebuttal statement -- 10 reported on the Committee's 2014 October Quarterly statement and 10 reported on the**

the reason stated in its August 5, 2016 Notice of Complaint letter. The refund of this money does not change the Department's August 5, 2016 analysis.

Brett McRae
November 17, 2016
Page 4

Committee's 2014 Annual statement (lists are included as an enclosure for your convenience) -- were made by the individuals listed and not the corporations which addresses were listed, such as copies of the contribution checks or statements from the contributors;² or if they were prohibited corporate contributions, proof that the Committee has refunded the contributions.

The Department will use this information to facilitate an informal resolution of Sen. Jones' complaint.

Please be advised that if the Department is unable to resolve Sen. Jones' complaint through informal methods, it is required by MCL 169.215(10) to conduct an administrative hearing to enforce the civil penalties provided in: 1) MCL 169.215(11), which provides that the Secretary of State may seek a civil fine of triple the amount of each improper contribution, plus up to \$1,000.00 for each violation of the Act; and 2) MCL 169.233(10), which provides that the Secretary of State may seek a civil fine of up to \$1,000.00 for each knowingly incomplete or inaccurate report.

Sincerely,



Lori A. Bourbonais
Bureau of Elections
Michigan Department of State

² The Department notes that a treasurer "shall keep detailed accounts, records, bill, and receipts as required to substantiate the information contained in a statement or report" for 5 years and make the records available for inspection. MCL 169.222.