



Zachary Lassiter

November 8, 2016 · 🌐

Even after the Sunny Sahu campaign was made aware of campaign finance violations last night they still continued to commit campaign finance violations. And yet another reason to vote Mary Balkema.

THE COMPLAINT INVOLVES THE CONDUCT JUST COMMITTED LAST NIGHT:

DISPOSITION

1. Sunny Sahu is a candidate for the office of Colusa County Treasurer, making the acquisition of a candidate under the Michigan Campaign Finance Act.
2. Sunny Sahu is the candidate "CITIZEN for Sunny Sahu" CAMPAIGN ID 10070 and is a committee regulated by the Michigan Campaign Finance Act.

ALLEGATIONS

1. CITIZEN for Sunny Sahu employed two paid staff who are in violation of the Michigan Campaign Finance Act to raise for SUNNY SAHU for the 2016 election. The Michigan Campaign Finance Act.

STATEMENTS OF FACT

1. According to the Michigan Campaign Finance Act, any candidate for the office of Colusa County Treasurer must file a statement of campaign finance with the Michigan Campaign Finance Act. The Michigan Campaign Finance Act.

HPSCAN_1108100504.pdf

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Zachary Lassiter Timeline 2016 All Posts

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Zachary Lassiter
November 8, 2016 ·

Congratulations Mary Balkema



Mary Balkema wins re-election as Kalamazoo County
treasurer

Balkema has been treasurer since 2007.

MLIVE.COM | BY MLIVE.COM

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Kyrlos Gatos likes
Cathy Taylor Spezia's post.



Virginia Wells Hudson
likes David Nealus's post in
ProKzoo Community
Discussion.



Stephanie Moore



Jason Pearsall



Jill Hawver



Jarad Setner



Melissa Renea Fish



Mark William LaChay



Jermaine Jackson



Nelly Fuentes-Donna...



Sherry Rohn Clency



Connor Farrell



MORE CONTACTS (24)

Allison Colberg



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

May 11, 2017

Sunny Sahu
7414 Starbrook
Portage, Michigan 49024

Kathy Valeii
471 Egleston Avenue
Kalamazoo, Michigan 49001

Dear Mr. Sahu and Ms. Valeii:

This letter concerns the complaint that was recently filed against you by Zachary Lassiter, which relates to a purported violation of the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.201 *et seq.* The Department of State has received a rebuttal statement from the complainant, a copy of which is enclosed with this letter.

Section 15(10) of the MCFA, MCL 169.215(10), requires the Department to determine within 45 business days from the receipt of the rebuttal statement whether there is a reason to believe that a violation of the Act has occurred. Mr. Lassiter's complaint remains under investigation at this time. At the conclusion of the review, all parties will receive written notice of the outcome of the complaint.

Sincerely,

Lori A. Bourbonais
Bureau of Elections
Michigan Department of State

c: Zachary Lassiter

Michigan Department of State
Bureau of Elections
Lansing, MI

In The Matter of:)	
)	
Citizens for Sunny Sahu)	REBUTTAL STATEMENT
Respondent)	TO RESPONDENT SAHU'S
)	RESPONSE
-&-)	
)	
Kathi Valeii)	22 FEB 2017
Respondent)	
)	
Zachary Lassiter)	
Complainant)	

SUMMARY

1. SAHU's response to the complaint contains no evidence based information to dispute the fact that VALEII, an agent of his campaign was paid to create communications advocating for SAHU's election. Facts and evidence submitted in the original complaint still point to the Sahu Campaign through its agents paid for communication with voters directly advocating for voters to vote for the campaign without a proper disclaimer statement.
2. SAHU's response contains statements which point to additional violations by his campaign of the Michigan Campaign Finance Act.
3. SAHU's response contains irrelevant personal attacks against complainant on the basis of disability, domestic violence survivor status and other items that are in now way relevant to the complaint in a clearly designed attempt to publicly embarrass complainant.
4. SAHU's response contains substantial misrepresentations and intentionally omitted facts, with his statements often contradicting the evidence that he provided the Department.

5. This rebuttal is filed timely within 10 business days of Feb 13 2017.

ADDITIONAL COMPLAINT

6. SAHU states in his response to my complaint that he received "two hours of discounted media consulting services"¹ from VALEII in the month of September.
7. The Michigan Campaign Finance Act defines a contribution as "Contribution includes [...]the granting of discounts or rebates not available to the general public"
8. SAHU's Campaign Finance Records do not disclose a contribution or in-kind contribution to the campaign by VALEII as required in the month of September. Only a \$10 direct contribution in the Month of July.
9. An additional campaign finance complaint is attached to this rebuttal statement.

RELEVANT RESPONSE

10. SAHU's response states that my "only challenge is to a \$60 payment on September 15th for two hours of discounted media consulting services"² and further states "my campaign manager Jennifer Judd arranged and contracted with Kathi Valeii to provide a couple hours of media-strategy consulting resources for the campaign's September response to discuss that immediate strategy including a letter to the editor. I am informed that the campaign paid Valeii \$60 for her time that night per her agreement with Judd [...] That completed all campaign activity related in any way to the \$60. Moreover Valeii did not write her November blog post as my employee or agent in any way³."

¹ SAHU Response Page 1 Paragraph 2

² SAHU Response, Page 1 Paragraph 2

³ SAHU Response, pg 2 Paragraph 3

11. SAHU asserts that "Valeii's contractual engagement with the campaign was made, fulfilled and paid within a few days in September 2016 long before the unconnected personal writings in November⁴"
12. While SAHU states VALEII was not an agent of his campaign at the time SAHU neglected to offer any documentation or evidence that is relevant to this complaint to the Department of State. He cites a letter to the Kalamazoo Gazette editor, and also cites a contract between VALEII and his campaign but fails to provide either.
13. The timing of VALEII's payment and the blog post is not relevant. Many marketing people require upfront payment before a project, and the post was clearly timed to coincide with the election for the best influence on the voter.
14. The Sahu Campaign shared and quoted VALEII's post in its is official communication with voters⁵. This demonstrates a clear connection to and coordination with VALEII.
15. The facts remain that VALEII received a payment for consulting services which is admitted by the Sahu Campaign and then published a piece advocating for people to vote for the Sahu Campaign just before the election without stating that she received payment from the campaign as required by the act.
16. A payment by a campaign to someone marked communications consulting and then the person receiving payment publishes a piece advocating for people to vote for that campaign is enough for any reasonable person to believe the the campaign paid for the publishing piece. The Sahu Campaign has not responded with any evidence to the contrary.

⁴ SAHU Response pg 2 Paragraph 1

⁵ Rebuttal Exhibit 1

BAD FAITH ALLEGATIONS BY RESPONDANT

17. While SAHU clearly considers complaints filed against any individual campaigning that has violated the Michigan Campaign Finance Act to be petty it is clearly not the case. The Michigan Campaign Finance Act was designed to protect the integrity of our democratic process, which is the foundation of our local and state government.
18. SAHU asserts that complaint was made in bad faith which clearly is not the case as the complaint is factual and supported by evidence.
19. SAHU further asserts that complaint is a "partisan weapon"⁶ which clearly isn't the case. Complainant neither aligns himself as a Democrat or Republican, and in SAHU's own exhibit attached to his rebuttal is list of persons Complainant said he was voting for and the list contains numerous members of both the Democrat and Republican Party. Furthermore I have filed complaints with this department against members of both political parties as well as non-partisan candidates which SAHU also acknowledges in his complaint. Complainant is also friends with various members of both parties who hold elected office, and members of both parties have thanked me for standing up for the voters recently.
20. SAHU further charges that Complainant performed no "thorough reasonable investigation." Complainant performed an extensive investigation including a Freedom of Information Act Request, Review of Campaign Finance Statements, Statements of Organization, as well as reviews of past inquiries by the Department of State and conversations with the Kalamazoo County Clerk's office on accuracy and where to find information in

⁶ SAHU Response, Pg 4 Paragraph 5

records. Complainant does not have the ability to review contracts or inside campaign communications, or the ability to force their disclosure.

21. SAHU alleges my "willingness to ignore allegations about the candidate he supports while embracing embracing those against her opponent⁷" is unfounded. In fact if he didn't cut out the comments portion of a Kalamazoo Gazette/mLIVE article that he submitted as evidence it would show that I stood up for him when the Republican Party alleged he could not be bonded that he provided ("County Treasurer candidate's arrest, tax history become campaign issue") it would show that I posted in the comments section under my real name asking the author of the news article to verify the statements, "@Malachi - could we get a bonding expert independent of the campaigns to verify that this would be an issue in obtaining bonding?⁸"
22. My complaints and investigations result in the disgust of the unethical and at times illegal behavior of those running for and holding office in Kalamazoo.
23. Sahu alleges I have reddit readers and "social media followers", reddit is a community website with subreddits which can involve certain interests or geographic communities including one for Kalamazoo /r/kzoo. I don't have readers that follow me on reddit, instead he refers to other community members which are anonymous and could be anyone including himself. On Facebook I have less than 1 thousand friends, family and past schoolmates many of which don't even live in Kalamazoo County. Sharing of my complaints online amongst my friends only is to show my disgust at local politics and general.

⁷ SAHU Response Pg 4, Paragraph 5

⁸ Rebuttal Exhibit 2

IRRELEVANT PERSONAL ATTACKS

24. It is my belief that rebuttal is not relevant to this investigation and is instead responses to personal attacks on myself by SAHU included in his response. I find it troubling that the vast majority of the SAHU response is spent attacking me in irrelevant ways and then attacking his election opponent who has nothing to do with this complaint. I feel that it is important that the public record contain factual information and not vile personal attacks.
25. My investigation into the Sahu Campaign began after the SAHU Campaign provided the Kalamazoo Gazette with a copy of a federal lawsuit the day it was filed before it was available online through the courts website indicating the campaign was connected to the lawsuit. It was SAHU's own negative campaign tactics that drew my attention to him. At the time I began my investigation I had no idea of the involvement with VALEII.
26. It should be noted that SAHU alleges that On October 13th 2016 "the publicity heated up" citing an article in the Kalamazoo Gazette Kalamazoo County and Mary Balkema sued for housing discrimination. SAHU however fails to disclose that it was his campaign 'heating things up' as his campaign provided that lawsuit to the Gazette. Citing his own exhibit, "A copy of the lawsuit was sent to the Kalamazoo Gazette by Sunny Sahu's campaign."
27. The Sahu Campaign infers that Mary Balkema paid \$400 to mLive (which owns the Kalamazoo Gazette) and received favorable coverage⁹. The Balkema Campaign and the Kalamazoo Gazette is not relevant to this inquiry, but it should be noted that the Kalamazoo Gazette printed the Balkema lawsuit story when it was provided to them by the Sahu Campaign. Also the Kalamazoo Gazette/mLive did

⁹ Sahu Response Page 1, Footnote

not endorse any local candidates in the past election or publish articles advocating for the election of local candidates. I personally checked through mLive as well as inquiring with their staff at their Kalamazoo Office in person. Those that know my history know I am often critical of the Kalamazoo Gazette's poor coverage, but I am forced to stand up for them in this case as the facts are clearly misrepresented SAHU.

28. SAHU states "To be clear, I had no contact with Commissioner Milcarek about the lawsuit or complaint¹⁰" which may be true, however the Freedom of Information Act Request¹¹ with the city of Kalamazoo shows it was his compensated agent VALEII that provided Commissioner Milcarek a copy with the lawsuit via email the day the lawsuit was filed before it was available through the court system's website.
29. My belief that Commissioner Milcarek is not qualified to hold the office of Kalamazoo City Commissioner is not relevant to this inquiry and based on a pattern of behaviors, use of profane language, and votes as an elected official.
30. My disagreement with Commissioner Shannon Sykes on the Foundation for Excellence in Kalamazoo is not relevant to this inquiry, and despite my disagreement with her on that topic I plan on voting for her in the future if she were to. I believe she serves the community with the best of intentions even though we disagree on a few issues. In my time being involved in local government in Kalamazoo I have disagreed with almost every elected official on something.
31. In his response SAHU states "By the time he filed his complaints Lassiter was not fairing well. By November 1, he was publishing ugly fights with his "ex" and on November 6 2016 he strangely disclosed for the last few months I've been sleeping 20 hours a day. I wish I could say it's refreshing."¹²

¹⁰ Sahu Response Pg 3, Paragraph 1

¹¹ Rebuttal Exhibit 3

¹² Sahu Response Pg 3, Paragraph 5

32. The fact that my abuser who has been convicted of domestic violence and whom I have held a personal protection order against continues to threaten, harass and stalk me is not relevant to this investigation. The fact that SAHU brings it up is a clear attempt to use my status as a male victim of domestic violence as a tool to embarrass and attack me in a public forum.
33. The fact that I've been sleeping 20 hours a day is not relevant to this investigation. I am fairly open and publicly acknowledge I have Autism Spectrum Disorder and Depression, even testifying to this fact before a Michigan Senate Committee on Autism legislation. The fact that this is brought up is once again a clear tactic by SAHU to bring up irrelevant items and attack me, this time on the basis of disability in a public forum.
34. How I am fairing has no relevance into this investigation, and SAHU having no medical training what so ever is not qualified to make that judgement. The only reason this was put in his response was a clear attempt to bully and harass complainant.
35. The attacks which SAHU exhibits in his response are the same type of behaviors that caused me to further investigate his campaign, as shown in his own exhibit where I am shown to say, "I am ashamed of the dirty tactics the Sahu campaign and his allies are doing". His response is just a furtherance of that tactic. The SAHU campaign and its supporters has a history of bullying and harassing even members of its own party who supported its opponent. Rather than addressing the issue at hand where a campaign finance violation is alleged he instead starts personal attacks on me, and his opponent.

CLOSING

36. Complainant believes the facts demonstrate that there is reason to believe that Citizens for Sunny Sahu has violated the Michigan Campaign Finance Act and compensated VALEII for the post advocating for people to vote for SAHU without a proper

disclaimer. While respondent SAHU asserts his campaign was in no way responsible for VALEII's post, he fails to provide any of the evidence he cites to substantiate his claim. Furthermore complainant has shown with evidence that VALEII's post was used and quoted in respondent's communication with voters indicating a direct connection and coordination.

37. Respondent's misrepresentations and that his claims contradict with his own exhibits sent to the Department show his statements to the department can not be taken at face value.

38. Complaint believes the facts clearly meet and exceed the legal threshold of "there may be reason to believe a violation of this act occurred¹³" and requests the Secretary of State make that finding and proceed in whatever manner the Secretary finds appropriate to inhibit further violations and protect the integrity of our democratic process.



Zachary Lassiter
PO BOX 51644
Kalamazoo MI 49005

Feb 22, 2017

¹³ Michigan Campaign Finance Act, Section 15(10)

REBUTTAL EXHIBIT 1

The screenshot shows the Facebook profile of 'Citizens for Sunny Sahu', established on November 7, 2016. The profile picture features three men. The cover photo is a black and white image with the text 'REJECT TRUMPISM IN KALAMAZOO' overlaid on portraits of two men. A post from November 14, 2016, is visible, titled 'You should be shocked by the Trump of Kalamazoo' and attributed to Kathi Valeii. The post text reads: 'Mary Balkema represents the extremism of the Republican far right. Balkema belongs to a base that has fallen out of touch with everyday Americans — even those within her own party.' The post has 449 likes and is shared by Lon Hoadley and 9 others. The page includes a left-hand navigation menu with links to Home, About, Photos, Events, Likes, Email Sign-up, Videos, and Posts. On the right, there are buttons for 'Contact Us' and 'Message', and a 'Public Figure' label. The bottom of the post shows interaction options like 'Like', 'Comment', and 'Share', along with a list of people who liked the post.

VALEII's post, which SAHU claims is not connected to his campaign in any way shared and quoted on the campaign's facebook page. This demonstrates a clear connection to the campaign

REBUTTAL EXHIBIT 2



ZachLassiter

Oct 20, 2016

@Malachi - could we get a bonding expert independent of the campaigns to verify that this would be an issue in obtaining bonding?

Also if an elected county treasurer could not obtain bonding as apparently required by law where would this leave the citizens of Kalamazoo County? Would we be without a treasurer? How would the office be filled? Would this require a recall?

I'd just really like more details here on how this affects things.

Flag Share

Like Reply



Malachi Barrett | mbarret1@mlive.com

Oct 20, 2016

@ZachLassiter As would I Zach. I've been attempting the contact the Michigan Municipal Risk Management Association for the past week to obtain an independent authority source. We wanted to get these issues out in the open to voters while I work on answering those questions.

Flag Share

2 Like Reply

Complainant's comments on mlive/Kalamazoo Gazette under his real name questioning republican parties claims about respondent's inability to be bonded due to his criminal and financial history show complainant even stood up for respondent despite respondent's claims.

REBUTTAL EXHIBIT 3

RECEIVED/FILED
MICHIGAN DEPT OF STATE
2017 FEB 27 AM 9:24
ELECTIONS/GREAT SEAL

FOIA CA16-904

Funk, Carrie to me
Good Afternoon.

11/7/16

Attached is the City's response to your recent FOIA request. There were no further emails found by IT.

Thank you.

Carrie Funk
Kalamazoo City Attorney's Office
241 W. South Street
Kalamazoo, MI 49007
p 269-337-8184 || 269-337-8339

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----- Forwarded message -----

From: Kathi Valeii <kathivaleii@gmail.com>
To: "Milcarek, Matt" <mmilcarek@kalamazoo-city.org>, <Sykes@kalamazoo-city.org>, <Anderson@kalamazoo-city.org>, <Harris@kalamazoo-city.org>, <Harris@kalamazoo-city.org>, <Harris@kalamazoo-city.org>, <Harris@kalamazoo-city.org>
Cc:
Bcc:
Date: Tue, 11 Oct 2016 20:28:08 -0400
Subject: Willie Caper v. County of Kalamazoo and Mary Balkema
Hello City Commissioners,

I just learned of this case, filed today, involving the County and Mary Balkema. I wanted to make sure you were all aware of it.

Kathi Valeii

A copy of the email from VALEII, a paid agent of the SAHU Campaign to Commissioner Matt Milcarek of Kalamazoo City containing the lawsuit against SAHU's opponent sent the day it was filed in federal court before it was available on the courts PACER system, despite SAHU's claims he had never communicated with Milcarek about this lawsuit



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

March 30, 2017

Zachary Lassiter
P.O. Box 51644
Kalamazoo, Michigan 49005

Dear Mr. Lassiter:

The Department of State received a second response to the complaint you filed against Citizens for Sunny Sahu and Kathi Valeii, 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.

Regrettably, the Department inadvertently failed to forward this response to you with its letter dated February 13, 2017. The Department apologizes for the delay in forwarding this additional response to you.

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,

Lori A. Bourbonais
Bureau of Elections
Michigan Department of State

c: Sunny Sahu
Kathi Valeii

February 6, 2017

RECEIVED/FILED
2017 FEB 13 PM 3:46
ELECTIONS/GREAT SEAL

Lori A. Bourbonais
Department of State
Bureau of Elections
Richard H. Austin Building, 1st Floor
430 West Allegan St.
Lansing, MI 48918

Dear Lori A. Bourbonais,

I am writing in response to a complaint that was filed against Sunny Sahu, Citizens for Sunny Sahu, and Kathi Valeii (me), alleging violations of the Michigan Campaign Finance Act.

I am a communications professional. I provide consultation and content development services. Citizens for Sunny Sahu paid me a one-time communications consulting fee (under oral contract with campaign manager, Jen Judd) on September 15, 2016 for a meeting that was held on that same day. The purpose of the meeting was to discuss how the campaign would address negative issues about Mr. Sahu that were going to begin to surface in the campaign. The payment I received was for feedback specific to those issues, including my review and editing service of a public statement Mr. Sahu had drafted in response to those issues.

I did not receive any other compensation from Citizens for Sunny Sahu for any other reason, and the campaign never paid me to write any articles for them.

In addition to my professional work, I have a long history of using my writing skills to advocate for things that I believe in, as a private citizen. The blog post, offered as Exhibit 2 in the complaint, was written independently by me on November 7, 2016, and was unrelated to the single payment that I received from Citizens for Sunny Sahu on September 15, 2016. Exhibit 2 is an opinion piece, written under my own name, published on my personal blog, and is protected under my first amendment right to free speech.

The article in question was not written as an agent for Citizens for Sunny Sahu. I was not an employee of Citizens for Sunny Sahu, and I was never paid to write articles for the campaign.

I hope this resolves the issue.

Sincerely,

Kathi Valeii



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

January 24, 2017

Sunny Sahu
Citizens for Sunny Sahu
7414 Starbrook Street
Portage, Michigan 49024

Kathi Valeii
471 Egleston Avenue
Kalamazoo, Michigan 49001

Dear Mr. Sahu and Ms. Valeii:

The Department of State (Department) received a formal complaint filed by Zachary Lassiter 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 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).

In support of his complaint, Mr. Lassiter provided copy of an article written by Ms. Valeii which states, "know who you're voting for [,]" "I'll be voting for Sunny Sahu [,]" and "he is the best candidate for the job [,]" It appears that the paid-for-by statement is omitted from the article. Mr. Lassiter also provided a copy of one page from the Citizens for Sunny Sahu Committee's 2016 Pre-Election campaign finance statement expenditure schedule which shows a payment to Kathi Valeii for "communications consultation."

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 Mr. Lassiter, 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: Zachary Lassiter

Before The
Michigan Department of State
Bureau of Elections
Lansing, MI

RECEIVED/FILED
MICHIGAN DEPT OF STATE
2016 NOV 16 PM 3:23
ELECTIONS/GREAT SEAL

In The Matter of:)	
)	
Citizens for Sunny Sahu)	COMPLAINT FOR
Committee ID # 54979)	VIOLATION OF
7414 Starbrook Street)	SECTION 47
Portage, MI 49024)	OF THE MICHIGAN
Violator)	CAMPAIGN FINANCE ACT
)	
-&-)	
)	
Kathi Valeii)	
471 Egleston Ave)	
Kalamazoo, MI 49001)	
Violator)	
)	
Zachary Lassiter (269)389-0176)	
PO BOX 51644)	
Kalamazoo, MI 49005)	
Complainant)	
)	

-THIS COMPLAINT INVOLVES NEW CONDUCT JUST COMMITTED LAST NIGHT-

JURISDICTION

1. Sunny Sahu is a candidate for the office of Kalamazoo County Treasurer, meeting the requirements of a candidate under the Michigan Campaign Finance Act.
2. Sahu Formed the Committee "Citizens for Sunny Sahu" Committee ID 54979 and is a committee regulated by the Michigan Campaign Finance Act.

ALLEGATIONS

3. CITIZENS FOR SUNNY SAHU employed and paid KATHI VALEII to write articles online that encourage voters to vote for SUNNY SAHU but do not contain the required disclaimer and therefore violate Section 47 of the Michigan Campaign Finance Act.

STATEMENTS OF FACT

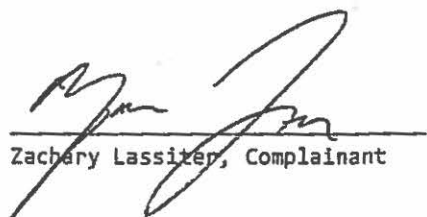
4. According to Pre Election Campaign Finance Statements filed October 28th 2016 with the Kalamazoo County Clerk by CITIZENS FOR SUNNY SAHU, KATHI VALEII is paid employee or contractor of the campaign. SEE EXHIBIT 1

In the Matter of CITIZENS FOR SUNNY SAHU, VALEII

5. In the late afternoon or early evening hours of November 7th 2016 KATHI VALEII published an article on the website Medium.com entitled "You should be shocked by the Trump of Kalamazoo - Let's get partisanship and bigotry out of the Treasurer's office on Tuesday. Kalamazoo doesn't need its very own Trump." SEE EXHIBIT 2
6. The article can be found at
<https://medium.com/@kathivaleii/you-should-be-shocked-by-the-trump-of-kalamazoo-88ea8ddb6c6f#.19opi0jxn>
7. The article advocates for readers to vote for SUNNY SAHU, whom KATHI VALEII is a paid employee and/or contractor of.
8. There is no disclaimer stating that the article was funded by CITIZENS FOR SUNNY SAHU.

CERTIFICATION

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



Zachary Lassiter, Complainant

Nov 8th 2016



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

June 27, 2017

Zachary Lassiter
P.O. Box 51644
Kalamazoo, Michigan 49005

Dear Mr. Lassiter:

The Department of State (Department) has concluded its review of the complaint you filed against Citizens for Sunny Sahu and Kathi Valeii, concerning an alleged violation of the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.201 *et seq.* This letter concerns the disposition of your 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), Mich. Admin. R 169.36(2).

You alleged that Citizens for Sunny Sahu and Kathi Valeii failed to include a complete and correct paid-for-by statement on an article published on the Medium.com website.

You filed your complaint on November 16, 2016, and Mr. Sahu and Ms. Valeii each filed an answer on February 13, 2017. You filed a rebuttal statement on February 27, 2017.

In support of your complaint, you provided a copy of an article written by Ms. Valeii which states, "know who you're voting for [,]" "I'll be voting for Sunny Sahu [,]" and "he is the best candidate for the job [,]" It appeared that there was no paid-for-by statement on the article. You also provided a copy of one page from the Citizens for Sunny Sahu Committee's 2016 Pre-Election campaign finance statement expenditure schedule which shows a payment to Kathi Valeii for "communications consultation."

In response to your complaint, Mr. Sahu and Ms. Valeii confirmed that Ms. Valeii was paid \$60.00 by the committee in September, 2016. Both asserted that this payment was a consulting fee paid to Ms. Valeii for services rendered by her at a meeting held in September, 2016. Mr. Sahu and Ms. Valeii each asserted that no other payment for any other services was made to Ms. Valeii. Specifically, both asserted that no payment was made to Ms. Valeii with regard to the November 7, 2016 article written by Ms. Valeii and posted to her personal blog. No evidence has been provided to the contrary.

The Act and corresponding administrative rules require a person to identify the person who paid for printed material that relates to an election. Here, the evidence provided supports a reason to believe that Ms. Valeii posted her own personal opinion on her own personal blog and no payment was made with regard to the post. Therefore, no paid-for-by statement was required.

Zachary Lassiter
June 27, 2017
Page 2

Based on the above, your complaint is dismissed.

Sincerely,

A handwritten signature in black ink, appearing to read "Lori A. Bourbonais". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Lori A. Bourbonais
Bureau of Elections
Michigan Secretary of State