

Byron School Board Voters

Vote November 8th For

Jacquelyn Sill-Crain

Stella Glass

William Shane Honke



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

December 29, 2016

Stella Glass
9549 East Cole Road
Durand, Michigan 48429

William Shane Honke
13349 Reed
Bryon, Michigan 48418

Jacquelyn Sill-Crain
11523 East Bath Road
Byron, Michigan 48418

Dear Ms. Glass, Mr. Honke, and Ms. Sill-Crain:

The Department of State (Department) received a formal complaint filed by Amy Lawrence 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 her complaint, Ms. Lawrence provided a flyer which states, "Vote November 8th For Jacquelyn Sill-Crain [,] Stella Glass [,] William Shane Honke [.]". There does not appear to be a paid-for-by statement on the flyer.

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

Stella Glass
William Shane Honke
Jacquelyn Sill-Crain
December 29, 2016
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Allegan Street, Lansing, Michigan 48918. If you fail to submit a response, the Department will render a decision based on the evidence furnished by the complainant.

A copy of your reply will be provided to Ms. Lawrence, who will have an opportunity to submit a rebuttal statement to the Department. After reviewing all of the statements and materials provided by the parties, the Department will determine whether "there may be reason to believe that a violation of [the MCFA] has occurred [.]" MCL 169.215(10). Note that the Department's enforcement powers include the possibility of entering a conciliation agreement, conducting an administrative hearing, or referring this matter to the Attorney General for enforcement of the criminal penalty provided in section 47(6) of the Act.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Lori A. Bourbonais".

Lori A. Bourbonais
Bureau of Elections
Michigan Department of State

c: Amy Lawrence

RECEIVED
MICHIGAN DEPT. OF STATE
DEC -1 PM 3:22

Campaign Finance Complaint Form
Michigan Department of State

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 <u>Amy Lawrence</u>	Daytime Telephone Number <u>5172040960</u>	
Mailing Address <u>11901 Fleming Rd.</u>		
City <u>Fowlerville</u>	State <u>MI</u>	Zip <u>48836</u>

Section 2. Alleged Violator		
Name <u>Stella Glass</u>		
Mailing Address <u>9549 E. Cole Rd.</u>		
City <u>Durand</u>	State <u>MI</u>	Zip <u>48429</u>

See Attached for 2 other

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

Section(s) of the MCFA violated:

169.247.

Explain how those sections were violated:

Their appeals to be a committee of citizens in the Byron Area that repeatedly distribute campaign materials each election cycle without properly identifying themselves. This is an example of the most recent organized activity, similar types of activities have taken place with -

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

See Attached Flyer that was placed in newspaper boxes in the voting district

* additionally - after questioning the three parties listed it is our belief that not all were aware of the distribution of these materials. However, it is our belief that all 3 know who did, but are unwilling to share those details.

each school related ballot issue.

Complaints should have also been filed in the past. However, they were not.

In an attempt to curb the unfair practices of this group of individuals ~~there~~ I decided that I should start reporting each of the violations as they occur.

I hope that this complaint is not deemed frivolous. This is a small community in Michigan, and this organized unidentified group is having a negative impact on our ability to improve the educational system.

Thank you for your help. nnn

Section 4. Certification (Required)

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

X

Signature of Complainant

Date

Section 5. Certification without Evidence (Supplemental to Section 4)

Section 15(6) of the MCFA (MCL 169.215) requires that the signed certification found in section 4 of this form be included in every complaint. However, if, after a reasonable inquiry under the circumstances, you are unable to certify that certain factual contentions are supported by evidence, you may also make the following certification:

I certify that to the best of my knowledge, information, or belief, there are grounds to conclude that the following specifically identified factual contentions are likely to be supported by evidence after a reasonable opportunity for further inquiry. Those specific contentions are:

X

Signature of Complainant

Date

Section 15(8) of the MCFA provides that a person who files a complaint with a false certification is responsible for a civil violation of the MCFA. The person may be required to pay a civil fine of up to \$1,000.00 and some or all of the expenses incurred by the Michigan Department of State and the alleged violator as a direct result of the filing of the complaint.

Mail or deliver the completed complaint form with an **original signature and evidence** to the following address:

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

Stella Glass
9549 E. Cole Rd.
Durand, MI 48429
Home phone 989-288-2035
Cell phone 571-749-4335

William Shane Honke
13349 Reed
Byron, MI 48418
Cell phone 989-666-3493

Jacquelyn Sill-Crain
11523 E Bath Rd
Byron, MI 48418
Home phone 810-266-4379
Cell phone 810-577-5032



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

January 30, 2017

Amy Lawrence
11901 Fleming Road
Fowlerville, Michigan 48836

Dear Ms. Lawrence:

The Department of State received two responses to the complaint you filed against Stella Glass, William Honke and Jacquelyn Sill-Crain, which concerns 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, 1st Floor, 430 West Allegan Street, Lansing, Michigan 48918.

Sincerely,

A handwritten signature in cursive script, reading "Lori A. Bourbonais".

Lori A. Bourbonais
Bureau of Elections
Michigan Department of State

c: Stella Glass
William Honke
Jacquelyn Sill-Crain

Dear Lori Bourbonais:

1/11/17

In response to the complaint filed by Amy Lawrence against myself, William & Jackie, I can assure you that I had no knowledge of this flyer until I found one in my front yard.

Also I was never questioned by anyone. The superintendent's secretary did call to tell me there was flyers out there & that they were illegal.

Please let me know if you have any other questions.



Stella Glass
9549 Cole Rd.
Durand MI 48429
517-749-4335

RECEIVED/FILED
MICHIGAN DEPT OF STATE
2017 JAN 19 PM 2:17
ELECTIONS/GREAT SEAL

January 16, 2017

Dear Ms. Baurbonais,

I'm writing in response to the formal complaint your department received against me from Amy Lawrence. Please let the record show that I did not know anything about the fliers that were circulated nor do I know who circulated them.

The complaint stated that I knew who circulated the fliers, but was unwilling to share those details. These are false and damaging statements about my character. If I were to accuse someone of these activities it would make me a party to slander just as I feel this is slanderous against myself.

Additionally, I would like to know who, besides Amy Lawrence, the other parties are filing the complaint. There are two references stating "our belief" indicating this is not just a party of one. Without the other parties being named, I feel this is fraudulent at the very least and waste of everyone's time.

Respectfully submitted,



Jacquelyn K. Sill-Crain

RECEIVED/FILED
MEMPHIS DEPT OF STATE
2017 JAN 26 PM 3:03
ELECTIONS/GREAT SEAL



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

June 28, 2017

Amy Lawrence
11901 Fleming Road
Fowlerville, Michigan 48836

Dear Ms. Lawrence:

The Department of State (Department) has concluded its review of the complaint you filed against Stella Glass, William Shane Honke, and Jacquelyn Sill-Crain (Respondents), 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 Respondents failed to include a complete and correct paid-for-by statement on a campaign flyer.

You filed your complaint on December 1, 2016. Ms. Glass filed an answer on January 19, 2017, and Ms. Sill-Crain filed an answer on January 26, 2017. You did not file a rebuttal statement with the Department.

In support of your complaint, you provided a flyer which stated, "Vote November 8th for Jacquelyn Sill-Crain [,] Stella Glass [, and] William Shane Honke [.]". The flyer did not appear to contain a paid-for-by statement. You stated in your complaint that you believed that all three knew who distributed the flyer.

In response to your complaint, Ms. Glass and Ms. Sill-Crain both asserted that they did not produce flyers and were unaware of who did. Absent any evidence to the contrary, the

Amy Lawrence
June 28, 2017
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Department takes Respondents at their word that they did not pay for the flyer in question.
Therefore, your complaint is dismissed.

Sincerely,

A handwritten signature in black ink, appearing to read "Lori A. Bourbonais".

Lori A. Bourbonais
Bureau of Elections
Michigan Secretary of State

c: Stella Glass
William Honke
Jacquelyn Sill-Crain