



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

January 24, 2017

John Taylor
Friends of John Taylor
3573 Kennbroke Court
Kalamazoo, Michigan 49006

Dear Mr. Taylor:

The Department of State (Department) received a formal complaint filed by Zachary Lassiter against your candidate committee, alleging that your committee violated the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.201 *et seq.* The investigation and resolution of this complaint is governed by section 15 of the Act and the corresponding administrative rules, R 169.51 *et seq.* A copy of the complaint and supporting documentation is enclosed with this letter.

The MCFA prohibits a candidate committee from making a "contribution to or an independent expenditure in behalf of another candidate committee." MCL 169.244(2). A knowing violation of section 44 is a misdemeanor punishable by a fine, imprisonment, or both. MCL 169.244(5).

Mr. Lassiter alleges that your candidate committee paid for a mailer which endorsed Stephanie Moore for Kalamazoo County Commissioner.

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 this complaint, you are required to do so within 15 business days of the date of this letter. 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 answer 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 penalties provided in section 44(5) of the Act.

John Taylor
January 24, 2017
Page 2

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". The signature is fluid and cursive, with the first name "Lori" being more prominent.

Lori A. Bourbonais
Bureau of Elections
Michigan Department of State

c: Zachary Lassiter

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

In The Matter of:)	
)	
)	
Friends of John Taylor)	COMPLAINT FOR VIOLATION OF
Committee ID 54943)	SECTION 44 OF THE MICHIGAN
3573 Kennbroke Court)	CAMPAIGN FINANCE ACT
Kalamazoo MI 49006)	
Violator)	
)	
)	
Zachary Lassiter (269)389-0176)	
PO BOX 51644)	
Kalamazoo, MI 49005)	
Complainant)	

JURISDICTION

1. JOHN TAYLOR Currently at the time of the violation served on the Kalamazoo County Board of Commissioners an elected office and was seeking the elected office of Kalamazoo County Clerk. TAYLOR is therefore considered a candidate under the Michigan Campaign Finance Law.

2. TAYLOR established the committee FRIENDS OF JOHN TAYLOR to support his candidacy for the Kalamazoo County Clerk position and therefore is a candidate committee under Michigan Campaign Finance Law.

3. STEPHANIE MOORE at the time of the violation served on the Kalamazoo County Board of Commissioners an elected office and she was seeking re-election to that office. MOORE is therefore considered a candidate under the Michigan Campaign Finance Law.

4. MOORE established the committee FRIENDS OF STEPHANIE MOORE to support her candidacy for the Kalamazoo County Board of Commissioners and is therefore a candidate committee under

In the Matter of FRIENDS OF JOHN TAYLOR

Michigan Campaign Finance Law.

ALLEGATIONS

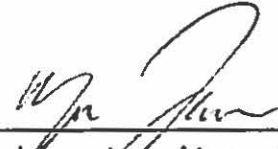
5. FRIENDS OF JOHN TAYLOR made a campaign contribution or independent expenditure supporting FRIENDS OF STEPHANIE MOORE in violation of Section 44 of the Michigan Campaign Finance Act.

STATEMENTS OF FACT

6. FRIENDS OF JOHN TAYLOR paid for campaign literature to be printed and mailed to voters in the Kalamazoo County area that encouraged voters to vote for STEPHANIE MOORE. SEE EXHIBIT 1
7. On the front side of the campaign literature is a photograph of JOHN TAYLOR and STEPHANIE MOORE with the words "We've got your back" and the campaign logos for both MOORE and TAYLOR's campaign.
8. On the back side of the campaign literature are the words "Vote for dedicated community leader!" and again the logos of MOORE and TAYLOR's campaign's as well as a list of reasons to vote for MOORE and TAYLOR.
9. The back side of the campaign literature contains the disclaimer of "Paid for by Friends of John Taylor 3573 Kenbrooke Ct Kalamazoo MI 49006"
10. A substantial portion of the literature in question advocates for the election of STEPHANIE MOORE to office with the full front side and half of the back side advocating for her election.
11. The campaign literature is either an independent expenditure of money or a campaign contribution by FRIENDS OF JOHN TAYLOR in support of STEPHANIE MOORE and her committee FRIENDS OF STEPHANIE MOORE. Both are violations of Section 44 of the Michigan Campaign Finance Act.

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.



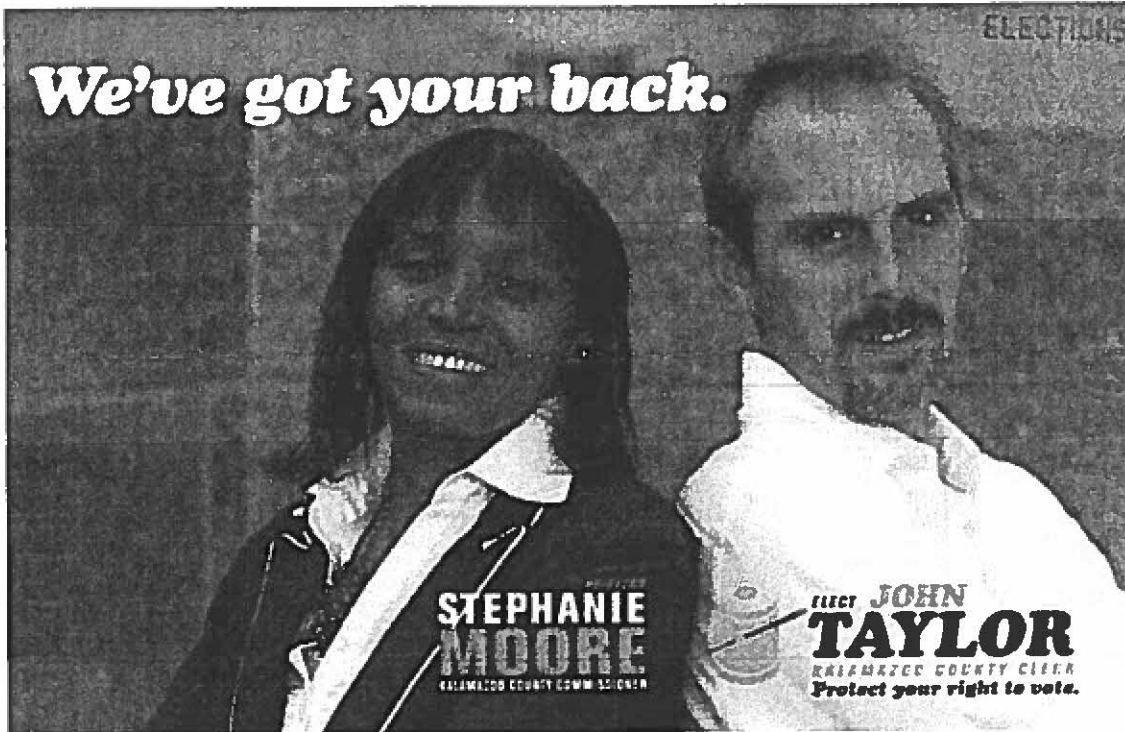
Zachary Lassiter, Complainant

Nov 10th 2016

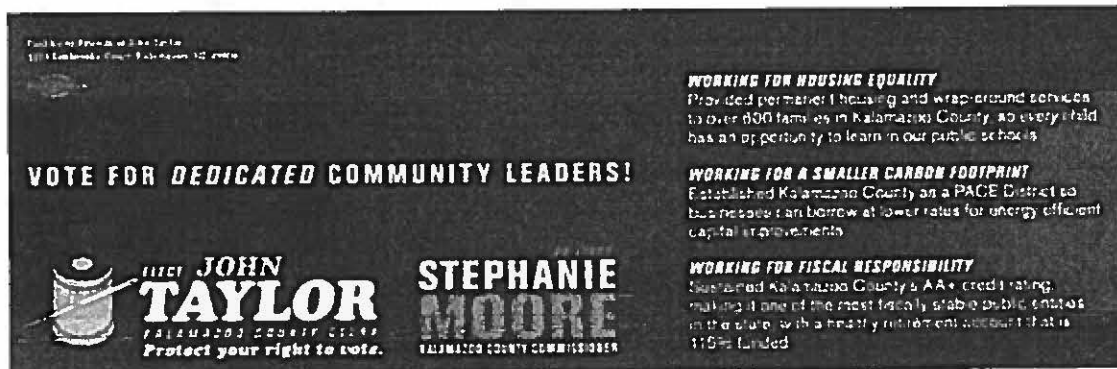
In the Matter of FRIENDS OF JOHN TAYLOR

EXHIBIT 1
FRONT

NOTED
2016 NOV 23 PM 2:15
ELECTIONS/CORRECTOR



BACK



POSTAGE
PAID
Kalamazoo, MI
Permit No.
1005



ZACHARY LASSITER
PO BOX 51644
KALAMAZOO MI 49005-1644



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 response to the complaint you filed against John Taylor, which concerns an alleged violation of the Michigan Campaign Finance Act (MCFA), 1976 P.A. 388, MCL 169.201 *et seq.* A copy of the response is provided as an enclosure with this letter.

If you elect to file a rebuttal statement, you are required to send it within 10 business days of the date of this letter to the Bureau of Elections, Richard H. Austin Building, 1st Floor, 430 West Allegan Street, Lansing, Michigan 48918.

Sincerely,

A handwritten signature in cursive script that reads "Lori A. Bourbonais".

Lori A. Bourbonais
Bureau of Elections
Michigan Department of State

c: John Taylor



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

2017 FEB 22 AM 9:29
AL

January 24, 2017

John Taylor
Friends of John Taylor
3573 Kennbroke Court
Kalamazoo, Michigan 49006

Dear Mr. Taylor:

The Department of State (Department) received a formal complaint filed by Zachary Lassiter against your candidate committee, alleging that your committee violated the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.201 *et seq.* The investigation and resolution of this complaint is governed by section 15 of the Act and the corresponding administrative rules, R 169.51 *et seq.* A copy of the complaint and supporting documentation is enclosed with this letter.

The MCFA prohibits a candidate committee from making a "contribution to or an independent expenditure in behalf of another candidate committee." MCL 169.244(2). A knowing violation of section 44 is a misdemeanor punishable by a fine, imprisonment, or both. MCL 169.244(5).

Mr. Lassiter alleges that your candidate committee paid for a mailer which endorsed Stephanie Moore for Kalamazoo County Commissioner.

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 this complaint, you are required to do so within 15 business days of the date of this letter. 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 answer 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 penalties provided in section 44(5) of the Act.

John Taylor
January 24, 2017
Page 2

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

Sincerely,

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Lori A. Bourbonais
Bureau of Elections
Michigan Department of State

c: Zachary Lassiter

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

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Friends of John Taylor)	COMPLAINT FOR VIOLATION OF
Committee ID 54943)	SECTION 44 OF THE MICHIGAN
3573 Kennbroke Court)	CAMPAIGN FINANCE ACT
Kalamazoo MI 49006)	
Violator)	
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Zachary Lassiter (269)389-0176)	
PO BOX 51644)	
Kalamazoo, MI 49005)	
Complainant)	
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4. MOORE established the committee FRIENDS OF STEPHANIE MOORE to support her candidacy for the Kalamazoo County Board of Commissioners and is therefore a candidate committee under

In the Matter of FRIENDS OF JOHN TAYLOR

Michigan Campaign Finance Law.

ALLEGATIONS

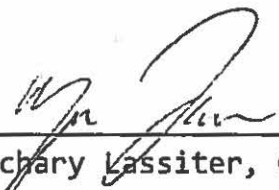
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STATEMENTS OF FACT

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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.



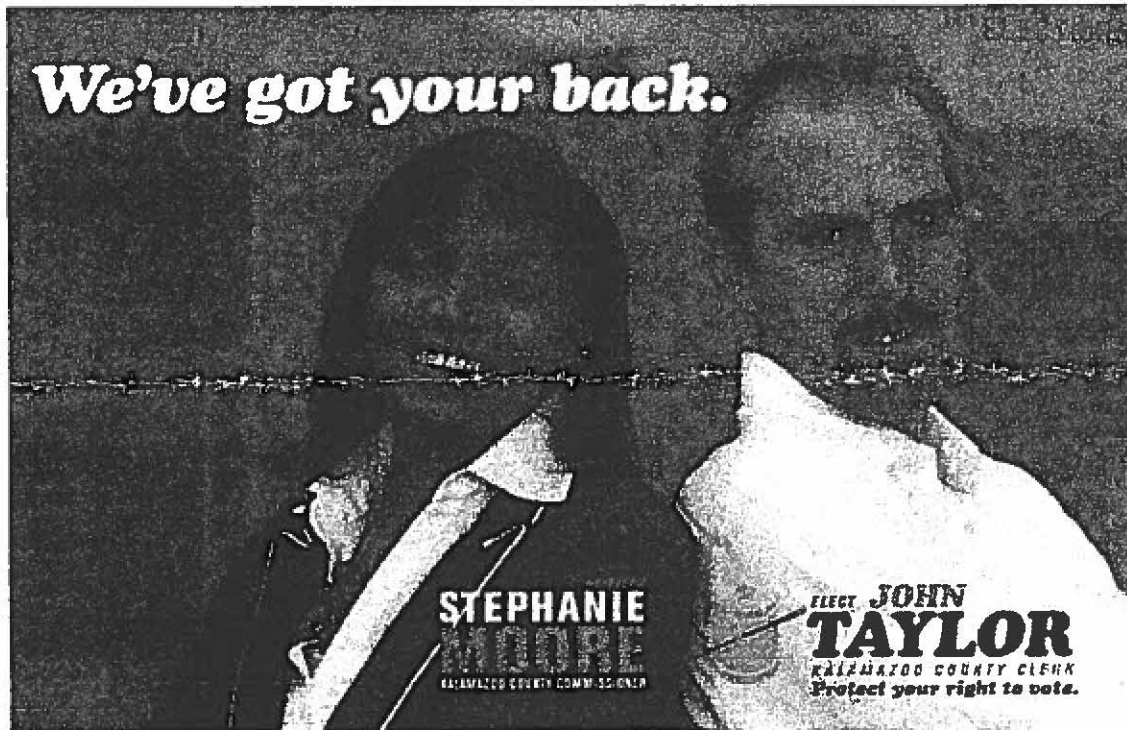
Zachary Lassiter, Complainant

Nov 10th 2016

In the Matter of FRIENDS OF JOHN TAYLOR

EXHIBIT 1
FRONT

2016 NOV 23 PM 2:15



BACK



ZACHARY LASSITER
PO BOX 51644
KALAMAZOO MI 49005-1644



After reviewing Mr Sassiter's complaint and going through old campaign material I regretfully agree that a violation did occur. It was during the last week of the campaign and the original intent was for Mrs Moore to contribute 50% of the cost for the mail piece. My campaign manager made an executive decision which I was unaware however take full responsibility for. I apologize and will make sure to the best of my abilities it does not happen in the future.

John Taylor

p.s. I do not
endorse Stephanie Moore for any
elected position.

Paid for by Friends of John Taylor

3573 Kenbrooke Court, Kalamazoo, MI 49006 • FriendsOfJohnTaylor.com • (269) 350-3067



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

July 6, 2017

John Taylor
Friends of John Taylor
3573 Kennbroke Court
Kalamazoo, Michigan 49006

Dear Mr. Taylor:

The Department of State (Department) has completed its initial investigation of the complaint filed against you by Zachary Lassiter, which alleged that you violated the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.201 *et seq.* This letter concerns the disposition of the complaint.

The MCFA prohibits a candidate committee from making a "contribution to or an independent expenditure in behalf of another candidate committee." MCL 169.244(2). A knowing violation of section 44 is a misdemeanor punishable by a fine, imprisonment, or both. MCL 169.244(5).

The Act further requires the Department to "endeavor to correct the violation or prevent a further violation by using informal methods [.]" if it finds that "there may be reason to believe that a violation ... has occurred [.]". MCL 169.215(10). The objective of an informal resolution is "to correct the violation or prevent a further violation [.]". *Id.*

Mr. Lassiter filed his complaint on November 23, 2016, and you filed an answer on February 22, 2017. Mr. Lassiter did not file a rebuttal statement with the Department.

Mr. Lassiter alleged that your candidate committee "paid for campaign literature ... that encouraged voters to vote for" Stephanie Moore. In support of his complaint, Mr. Lassiter provided a copy of a mailer which stated, "VOTE FOR *DEDICATED* COMMUNITY LEADERS! ELECT JOHN TAYLOR [.] RE-ELECT STEPHANIE MOORE [.]". The mailer indicated that it was paid for by the Friends of John Taylor committee.

In your answer you stated that the original intent was for Ms. Moore's committee to pay for her proportionate share of the mailer, but this payment was never made.

The Act expressly prohibits one candidate committee from making a contribution to or an independent expenditure for another candidate committee. MCL 169.244(2). The words "contribution" and "expenditure" are terms of art that are generally defined to include a payment or transfer of anything of ascertainable monetary value made for the purpose of influencing or made in assistance of the nomination or election of a candidate. MCL 169.204(1), 169.206(1).

John Taylor
July 6, 2017
Page 2

By urging readers to vote for Ms. Moore on the mailer and paying for the production and mailing of those mailers, your committee made a payment for the purpose of influencing Ms. Moore's nomination or election.

Because the mailer paid for by your candidate committee expressly urged readers to vote for Ms. Moore, the Department finds that the evidence supports a reason to believe that a violation of the Act has occurred.

The Department is mandated by the MCFA to "correct the violation or prevent a further violation" by informal methods if it finds that a violation occurred. MCL 169.215(10). To further this objective, **please provide the Department with invoices, receipts, proofs of payment, or any other record maintained you or your committee that reflects your committee's total charges and payments for these mailers. Please include costs for design, production, and distribution, along with any other cost incurred with regard to this mailer.**

Please provide this material to the Department **on or before July 28, 2017**. After its review of the information, the Department will then determine how to proceed. Please note that if the Department is unable to resolve this matter informally, the Act requires the Department to refer the matter to the Attorney General for other enforcement action. MCL 169.244(5), MCL 169.215(10)(a).

Sincerely,

A handwritten signature in black ink, appearing to read "Lori A. Bourbonais", is written over the typed name.

Lori A. Bourbonais
Bureau of Elections
Michigan Department of State



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

September 6, 2017

John Taylor
Friends of John Taylor
3573 Kennbroke Court
Kalamazoo, Michigan 49006

Via Certified Mail

SECOND REQUEST

Dear Mr. Taylor:

The Department of State (Department) informed you via letter dated July 6, 2017 (enclosed for your convenience) that it had completed its initial investigation of the complaint filed against you by Zachary Lassiter, which alleged that you violated the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.201 *et seq.*

The MCFA prohibits a candidate committee from making a "contribution to or an independent expenditure in behalf of another candidate committee." MCL 169.244(2). A knowing violation of section 44 is a misdemeanor punishable by a fine, imprisonment, or both. MCL 169.244(5).

The Act further requires the Department to "endeavor to correct the violation or prevent a further violation by using informal methods [.]" if it finds that "there may be reason to believe that a violation ... has occurred [.]" MCL 169.215(10). The objective of an informal resolution is "to correct the violation or prevent a further violation [.]" *Id.*

In its July 6, 2017 letter, the Department informed you that the evidence provided supported a reason to believe that you had violated section 44 of the Act by paying for a mailer that expressly urged readers to vote for Stephanie Moore. The Department then asked you to provide the following:

[I]nvoices, receipts, proofs of payment, or any other record maintained you or your committee that reflects your committee's total charges and payments for these mailers. Please include costs for design, production, and distribution, along with any other cost incurred with regard to this mailer.

The Department asked that you provide this material on or before July 28, 2017 so that it may determine how to proceed. However, as of this date, the Department has not received a response from you.

John Taylor
September 6, 2017
Page 2

The Department now requests that you provide this information to the Department no later than September 22, 2017. After its review of the information, the Department will determine how to proceed.

Please note that if the Department is unable to resolve this matter informally, the Department is required to refer the matter to the Attorney General for enforcement of the criminal penalty. MCL 169.244(5), MCL 169.215(10)(a).

Sincerely,

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Lori A. Bourbonais
Bureau of Elections
Michigan Department of State



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

July 6, 2017

John Taylor
Friends of John Taylor
3573 Kennbroke Court
Kalamazoo, Michigan 49006

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John Taylor
July 6, 2017
Page 2

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Please provide this material to the Department on or before July 28, 2017. After its review of the information, the Department will then determine how to proceed. Please note that if the Department is unable to resolve this matter informally, the Act requires the Department to refer the matter to the Attorney General for other enforcement action. MCL 169.244(5), MCL 169.215(10)(a).

Sincerely,

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Lori A. Bourbonais
Bureau of Elections
Michigan Department of State



**ITEMIZED EXPENDITURES
SCHEDULE 1B
CANDIDATE COMMITTEE**

1. Committee I. D. Number 54943
2. Committee Name Friends of John Taylor

3. Name and address of person or vendor to whom paid	4. Purpose (Required Information)	5. Date	6. Amount
Expenditure #1 Name Vantiv, LLC Address 8500 Governors Hill Dr. Symmes Township OH 45249 <input type="checkbox"/> Fund Raiser	Purpose: <u>Credit Card Processing Fees</u> <input type="checkbox"/> Check box if this expenditure is payment of debt or obligation reported on previous statement	<u>10/23/16</u> Date	<u>\$ 51.64</u> Click Here for Memo Itemization Type
Expenditure #2 Name Heather Ricketts Address 2600 Hunters Pt Kalamazoo MI 49048 <input type="checkbox"/> Fund Raiser	Purpose: <u>Lunchon Womans Equality</u> <input type="checkbox"/> Check box if this expenditure is payment of debt or obligation reported on previous statement	<u>08/26/16</u> Date	<u>\$ 75</u> Click Here for Memo Itemization Type
Expenditure #3 Name Stephanie Williams Address 3421 Kenbrooke Ct Kalamazoo MI 49006 <input type="checkbox"/> Fund Raiser	Purpose: <u>Staff Payment</u> <input type="checkbox"/> Check box if this expenditure is payment of debt or obligation reported on previous statement	<u>09/01/16</u> Date	<u>\$ 1300</u> Click Here for Memo Itemization Type
Expenditure #4 Name Nora Gimple Address 1539 Kickapoo Ct Kalamazoo MI 49006 <input type="checkbox"/> Fund Raiser	Purpose: <u>Staff Payment</u> <input type="checkbox"/> Check box if this expenditure is payment of debt or obligation reported on previous statement	<u>09/01/16</u> Date	<u>\$ 500</u> Click Here for Memo Itemization Type
Expenditure #5 Name Patrick Farmer Address 3629 Kenbrooke Ct Kalamazoo MI 49006 <input type="checkbox"/> Fund Raiser	Purpose: <u>Staff Payment</u> <input type="checkbox"/> Check box if this expenditure is payment of debt or obligation reported on previous statement	<u>09/01/16</u> Date	<u>\$ 100</u> Click Here for Memo Itemization Type
Subtotal this page			\$2,026.64
Grand Total of all Schedules 1B (Complete on last page of Schedule)			Enter this total on line 8a of Summary Page

After reviewing my records
the total cost for the joint mail
piece is \$1588.^{ss}. This includes postage
and design.

John T. [Signature]

RECEIVED/FILED
MISSOURI DEPT OF STATE
2017 SEP 22 AM 9:23
ELECTIONS/GREAT SEAL



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

September 6, 2017

John Taylor
Friends of John Taylor
3573 Kennbroke Court
Kalamazoo, Michigan 49006

Via Certified Mail

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In its July 6, 2017 letter, the Department informed you that the evidence provided supported a reason to believe that you had violated section 44 of the Act by paying for a mailer that expressly urged readers to vote for Stephanie Moore. The Department then asked you to provide the following:

[I]nvoices, receipts, proofs of payment, or any other record maintained you or your committee that reflects your committee's total charges and payments for these mailers. Please include costs for design, production, and distribution, along with any other cost incurred with regard to this mailer.

The Department asked that you provide this material on or before July 28, 2017 so that it may determine how to proceed. However, as of this date, the Department has not received a response from you.

UTILITYDESIGN

513 AXTELL STREET
KALAMAZOO MI 49008
C 269 779 9633
L 269 343 2254



Invoice

Date November 3, 2016

Terms Net 15

Client Friends of John Taylor
3573 Kenbrooke Court
Kalamazoo, MI 49006

Project(s) 1 Location Photography
2 Printed campaign materials

Task Description	Hours/Quantity	Rate	Totals
8-30 Photography	4.5 hrs	\$50	225.00
Location shooting, digital photo editing, color correction, retouching, and file output			
9-11 Photography (Hoadley)*	2.25 hrs	\$50	112.50
Locations shooting, digital photo editing, and file output			
9-14 Photography (Crowells)	3 hrs	\$50	150.00
Lighting, location shooting, digital photo editing, color correction, and file output			
10-14 Photography (Moore)*	2 hrs	\$50	100.00
Location shooting, digital photo editing, and file output			
Logo Modifications*	2.5 hrs	\$50	225.00
Alterations to original vector art from state senate identity			
Intro Card	5.75 hrs	\$50	287.50
Layout and design, typesetting, digital copy editing/writing, and file output			
Bipartisan Card	4.25 hrs	\$50	212.50
Layout and design, typesetting, copy editing/writing, and file output			
Reminder Card	2.25 hrs	\$50	112.50
Layout and design, typesetting, digital image manipulation, copy writing, and file output			
Moore Card	2.0 hrs	\$50	100.00
Layout and design, typesetting, copy editing, and file output			
Campaign Contribution			-600.00

Total Due

••••• \$ 925.00

Please make checks payable to: Martin Burch



ITEMIZED EXPENDITURES
SCHEDULE 1B
CANDIDATE COMMITTEE

1. Committee I. D. Number 54943
2. Committee Name Friends of John Taylor

3. Name and address of person or vendor to whom paid	4. Purpose (Required Information)	5. Date	6. Amount
Expenditure #1 Name <u>Citizens for Jeff Getting</u> Address <u>5176 ATWATER COURT</u> <u>Kalamazoo MI 49009</u> <input type="checkbox"/> Fund Raiser	Purpose: <u>fund raiser ticket</u> <input type="checkbox"/> Check box if this expenditure is payment of debt or obligation reported on previous statement	<u>10/24/16</u> Date	<u>\$ 38</u>
Expenditure #2 Name <u>Meijer</u> Address <u>119 W Main St</u> <u>Kalamazoo MI 49009</u> <input type="checkbox"/> Fund Raiser	Purpose: <u>Mailing Labels</u> <input type="checkbox"/> Check box if this expenditure is payment of debt or obligation reported on previous statement	<u>11/01/16</u> Date	<u>\$ 123.98</u>
Expenditure #3 Name <u>Stephanie Williams</u> Address <u>3421 Kenbrooke Ct</u> <u>Kalamazoo MI 49006</u> <input type="checkbox"/> Fund Raiser	Purpose: <u>Postage - reimbursement</u> <input type="checkbox"/> Check box if this expenditure is payment of debt or obligation reported on previous statement	<u>11/15/16</u> Date	<u>\$ 470</u>
Expenditure #4 Name <u>Facebook</u> Address <u>1 Hacker Way</u> <u>Menlo Park CA 94025</u> <input type="checkbox"/> Fund Raiser	Purpose: <u>Adverts</u> <input type="checkbox"/> Check box if this expenditure is payment of debt or obligation reported on previous statement	<u>11/05/16</u> Date	<u>\$ 50</u>
Expenditure #5 Name <u>RJ's Printing</u> Address <u>1001 Second St</u> <u>Kalamazoo MI 49001</u> <input type="checkbox"/> Fund Raiser	Purpose: <u>Printing</u> <input type="checkbox"/> Check box if this expenditure is payment of debt or obligation reported on previous statement	<u>11/03/16</u> Date	<u>\$ 1388.55</u>

Subtotal this page \$2,070.53

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

Enter this total
on line 8a of
Summary Page



Invoice

Date	Invoice #
11/3/2016	14779

Bill To

John Taylor
3573 Kenbrooke Court
Kalamazoo, MI 49007

PAID
11/06/2016

F.O.B.	F.O.B.	F.O.B.	F.O.B.	F.O.B.	F.O.B.

Quantity	Item Code	Description	Price Each	Amount
2,500	Post Cards	Post Cards 5.5 x 8.5 Full Color 2-Sided	0.144	360.00T
2,479	Mailer	Address, Sort Tray and Deliver to USPS	0.12908	320.00T
2,479	Postage	Postage	0.25411	629.95T
		SALES TAX	6.00%	78.60

Thank you for your business.

Total	\$1,388.55
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PRESS FIRMLY TO SEAL

PRESS FIRMLY TO SEAL



1004



48918

KALAMAZOO, MI
49001
SEP 18 17
AMOUNT
\$6.65
R2305K135738-11



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FROM:

**PRIORITY[®]
★ MAIL ★**

FROM:

John Taylor
1914 Forrest Dr.
Portage MI 49002

TO:

Bureau of Elections
430 W. Allegan
Lansing MI 48918

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

October 16, 2017

John Taylor
Friends of John Taylor
1914 Forest Drive
Portage, Michigan 49002

Dear Mr. Taylor:

The Department of State (Department) has concluded its investigation of the complaint filed by Zachary Lassiter against you, which alleged that you violated the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.201 *et seq.* This letter concerns the disposition of Mr. Lassiter's complaint, which was filed on November 23, 2016. You filed an answer to the complaint on February 22, 2017. Mr. Lassiter did not file a rebuttal statement.

The MCFA and corresponding administrative rules require the Department to ascertain whether there may be "reason to believe that a violation of this act has occurred." MCL 169.215(10), R 169.55(3). The Department has carefully considered the written statements and supporting documentation and has determined that the evidence submitted meets this evidentiary standard. Upon a finding that there may be "reason to believe that a violation of this act has occurred[.]" the Department is required by law to "endeavor to correct the violation or prevent a further violation by using informal methods." MCL 169.215(10).

Mr. Lassiter alleged that your candidate committee paid for a mailer which endorsed Stephanie Moore for Kalamazoo County Commissioner.

The MCFA prohibits a candidate committee from making a "contribution to or an independent expenditure in behalf of another candidate committee." MCL 169.244(2).

By letters dated July 6, 2017 and September 6, 2017, the Department notified you if its determination that the evidence provided supported a reason to believe that a violation of the Act had occurred. The Department requested that you provide the Department with invoices, receipts, proofs of payment, or any other record maintained by you or your committee that reflected the committee's total charges and payments for these mailers. The Department asked you to include costs for design, production, and distribution, along with any other cost incurred with regard to the mailer.

You provided this information to the Department September 22, 2017. After careful review of the records submitted, the Department finds that the evidence supports a conclusion that your committee spent \$1,588.55 on the mailer.

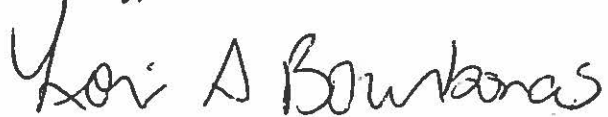
After reviewing the mailer, the Department finds the mailer equally contained information for voters that was intended to further your own election and information for voters that was intended to further the election of Ms. Moore. The portion of the expenditure to further Ms. Moore's election was made in contravention of the Act. Because the Department has determined 1/2 of the flyer contained information that was impermissibly paid for by your committee, the Department considers 1/2 of the \$1,588.55, or \$794.27, to be the total amount of the improper expenditure made in behalf of Ms. Moore's candidate committee.

Having made these determinations, the Department must now "endeavor to correct the violation or prevent a further violation by using informal methods." MCL 169.215(10). The Department offers to resolve Mr. Lassiter's complaint against you informally through execution of the enclosed conciliation agreement, which requires you to attempt to recover \$794.27 from Ms. Moore's committee and to pay a civil fine in the amount of \$794.27. **If you wish to enter into the conciliation agreement, please return the original signed document to P.O. Box 20126, Lansing, Michigan 48901-0726, along with payment in full of the \$794.27 fine, on or before November 3, 2017.** Payment must be made by check or money order payable to the State of Michigan; please include the notation, "Conciliation Agreement, Attn: Bureau of Elections" on the check or money order. A copy of the conciliation agreement signed by the Secretary of State's authorized representative will be returned to you promptly.

Please be advised that if the Department is unable to resolve Mr. Lassiter's complaint informally, it is required by MCL 169.215(10)-(11) to:

- 1) Refer the matter to the Attorney General with a request that his office prosecute it for the crime of a candidate committee making a contribution to or independent expenditure in behalf of another candidate committee, a misdemeanor violation of MCL 169.244(2); and/or
- 2) Conduct an administrative hearing to enforce the civil penalty provided in MCL 169.215(11), which provides that the Secretary of State may seek a civil fine up to triple the amount of the improper contribution or expenditure plus up to \$1,000.00 per violation.

Sincerely,



Lori A. Bourbonais
Bureau of Elections
Michigan Department of State

Enclosure



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

In the Matter of:

John Taylor
Friends of John Taylor
1914 Forest Drive
Portage, Michigan 49002

CONCILIATION AGREEMENT

Pursuant to MCL §169.215(10) of the Michigan Campaign Finance Act (the Act), MCL §169.201 *et seq.*, the Secretary of State and John Taylor (Respondent) hereby enter into a conciliation agreement with respect to certain acts, omissions, methods, or practices prohibited by the Act.

The Secretary of State alleges that there may be reason to believe that Respondent violated MCL §169.244(2) by making improper expenditures from his candidate committee in the amount of \$794.27 in behalf of Stephanie Moore.

Therefore, Respondent, without admitting any issue of law or fact, except as stated herein, hereby voluntarily enters into this conciliation agreement and assures the Secretary of State that he will comply with the Act and the Rules promulgated to implement the Act.

By executing this conciliation agreement, Respondent certifies that he has (1) attempted to recover \$794.27 from the candidate committee of Stephanie Moore, and (2) paid in full a \$794.27 fine by check or money order payable to the State of Michigan.

The Secretary of State and Respondent further agree that this agreement is in effect and enforceable for four years from the date it is signed by the Secretary of State or her duly authorized representative.

The Secretary of State and Respondent further agree that this agreement, unless violated, shall constitute a complete bar to any further action by the Secretary of State with respect to the alleged violation that resulted in the execution of this agreement.

The Secretary of State and Respondent further agree that the complaint and investigation that resulted in this agreement are disposed of and will not be the basis for further proceedings, except pursuant to this agreement.

The Secretary of State and Respondent further agree that this agreement will not prevent the Secretary of State from taking action for violations of this agreement.

The Secretary of State and Respondent further agree that Respondent's performance under this agreement shall be given due consideration in any subsequent proceedings.

The Secretary of State and Respondent further agree that this agreement, when signed, shall become a part of the permanent public records of the Department of State.

The Secretary of State and Respondent finally agree that the signatories below are authorized to enter into and bind the parties to this agreement, and have done so by signing this agreement on the date below.

RUTH JOHNSON
SECRETARY OF STATE

RESPONDENT

Sally Williams, Director
Bureau of Elections

John Taylor

Date: _____

Date: _____

THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND ON WHITE PAPER

FRIENDS OF JOHN TAYLOR
PATRICK A FARMER
3573 KENBROOKE CT
KALAMAZOO MI 49006-5436
Phone: 319-775-2395

0101

74-8486/2724

10/20/2017

PAY TO THE
ORDER OF

State of Michigan

\$ 794.27

Seven Hundred Ninety Four & 27/100

DOLLARS

HONOR



CREDIT UNION

8395 Edgewood Road • Benken Springs, MI 49103

(269) 983-6357 • www.honorcu.com

(Conciliation Agreement
Att. Bureau of Elections)

[Signature]



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

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ELECTIONS/GREAT SEAL

In the Matter of:

John Taylor
Friends of John Taylor
1914 Forest Drive
Portage, Michigan 49002

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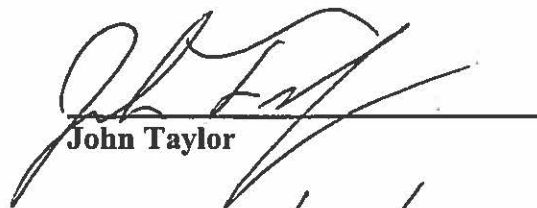
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RUTH JOHNSON
SECRETARY OF STATE

RESPONDENT



Sally Williams, Director
Bureau of Elections



John Taylor

Date: 11/13/17

Date: 10/20/2017



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

November 15, 2017

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

Dear Mr. Lassiter:

The Department of State has concluded its investigation of the complaint that you filed against the John Taylor, which concerned an alleged violation of the Michigan Campaign Finance Act (MCFA), 1976 P.A. 388, MCL 169.201 *et seq.* A copy of the final resolution is provided as an enclosure with this letter.

Sincerely,

A handwritten signature in cursive script that reads "Lori A. Bourbonais".

Lori A. Bourbonais
Bureau of Elections
Michigan Department of State