



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

April 6, 2016

Michelle Economou Ureste
7298 Colony Drive
West Bloomfield, Michigan 48323

Patricia Richie
5356 Bentley Road #106
West Bloomfield, Michigan 48372

Dear Ms. Economou Ureste and Ms. Richie:

The Department of State (Department) received a formal complaint filed by Keith Nathanson against you, alleging that you 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.* Copies of the complaint and supporting documentation are enclosed with this letter.

In Michigan it is unlawful for a public body or an individual acting on its behalf to use or authorize the use of "funds, personnel, office space, computer hardware or software, property, stationery, postage, vehicles, equipment, supplies, or other public resources to make a contribution or expenditure [.]" MCL 169.257(1). A knowing violation of section 57 is a misdemeanor offense. MCL 169.257(4).

Mr. Nathanson alleges that you improperly used public funds by using county resources to submit Ms. Richie's Statement of Organization.

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. You may each submit your own answer or you may submit one answer signed by both 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 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(s) will be provided to Mr. Nathanson, who will have an opportunity to submit a rebuttal statement to the Department. After reviewing all of the statements and

Michelle Economou Ureste
Patricia Richie
April 6, 2016
Page 2

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 57(4) 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". 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 Department of State

c: Keith Nathanson

Campaign Finance Complaint Form Michigan Department of State

2016 MAR 30 PM 5:01

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 162.201 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 KEITH M NATHANSON	Daytime Telephone Number 248 436 4833	
Mailing Address 2745 Pontiac Lake Road		
City Warren	State MI	Zip 48328

Section 2. Alleged Violator		
Name PATRICIA RICHIE + MICHELLE ECONOMOS URGSTE		
Mailing Address 5356 Bentley Road #106 West Bloomfield 48322 / 7298 County Drive West Bloomfield MI 48322		
City WEST BLOOMFIELD	State MI	Zip 48322 / 48322

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

Section(s) of the MCFA violated:

MCL 169.257

Explain how those sections were violated:

PLEASE SEE ATTACHED. MS. RICHIE AND THE SUPERVISOR, MS. ECONOMOS-URGSTE ARE USING PUBLIC RESOURCES TO RUN MS. RICHIE'S CAMPAIGN. THE FAX HEADER OF THE DOCUMENT CLEARLY SHOWS IT BEING SENT FROM THE WB TWP SUPERVISORS OFFICE.

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

PLEASE SEE ATTACHED STATEMENT OF ORGANIZATION

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

3/30/2016
Date**Section 5. Certification without Evidence (Supplemental to Section 4)**

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

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

X

Signature of Complainant

3/30/2016
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

Sep 11 15 10:18a

WB Twp Supervisors Office

2486820432

p.1



MICHIGAN DEPARTMENT OF STATE
BUREAU OF ELECTIONS

ORIGINAL OR AMENDED
STATEMENT OF ORGANIZATION FORM FOR CANDIDATE COMMITTEES

1. Committee ID #: 96375	*2. Type of Filing: <input checked="" type="checkbox"/> Original: <input type="checkbox"/> Amendment to Items:		Eff. Date: 9-10-15
*3. Full Name of Committee (must include Candidate's first and last name): Committee to Elect Patricia J. Richie			
*4a. Candidate Full Name: Last Name: Richie	First Name: PATRICIA		
*4b. Political Party (if applicable): DEMOCRAT	*4c. County of Residence: OAKLAND		
*4d. Office Sought: West Bloomfield Twp. trustee	*4e. District/Circuit # or Jurisdiction:		
*5. Date Committee was Formed: 9-10-2015			
*6a. Committee Phone: 248 592 0650	6b. Committee Fax #:		
6c. Committee Email Address:	6d. Committee Website Address:		
*7a. Complete Committee Mailing Address (May be PO Box): 5356 Bentley Rd #106 West Bloomfield, Michigan 48322			
*7b. Complete Committee Street Address (May not be PO Box): 5356 Bentley Rd #106 West Bloomfield Michigan 48322			
*8. Treasurer Name and Complete Address: MARK B. Richie			
Phone #: 248 592 0650		Email Address:	
9. Designated Record Keeper Name and Complete Address: MARK B. Richie 5356 Bentley Rd, #106 West Bloomfield, Michigan 48322			
Phone #: 248 592 0650		Email Address:	
*10. REPORTING WAIVER REQUEST: <input type="checkbox"/> YES, I/We WANT TO APPLY FOR THE REPORTING WAIVER. The committee does not expect to receive or expend in excess of \$1,000 in an election. I/We understand that if the committee does not spend or receive in excess of \$1,000 in an election, the committee does not owe Pre, Post, Quarterly and Annual Campaign Statements. I/We further understand that the Reporting Waiver will be automatically lost if the committee exceeds the \$1,000 threshold and all required campaign statements must be filed. A Reporting Waiver does not exempt a committee from filing Late Contribution Reports. <input checked="" type="checkbox"/> NO, I/We DO NOT WANT TO APPLY FOR THE REPORTING WAIVER. The committee expects to receive or expend in excess of \$1,000 in an election. I/We understand that the committee owes Pre, Post, Quarterly and Annual Campaign Statements even if the committee does not spend or receive in excess of \$1,000 in an election. I further understand that the Reporting Waiver cannot be requested retroactively to avoid filing requirements and to avoid paying late filing fees. Further information regarding Reporting Waivers can be found in Appendix C of the Committee Manual.			
*11. Name and Address of Depositories or Intended Depositories of committee funds. (Michigan Bank, Credit Union or Savings & Loan Association) While this item must be completed, an account does not have to be opened until the first contribution is received. *Official Depository (name and address): BANK OF AMERICA, 6120 Maple Rd, West Bloomfield, MI 48322 Secondary Depository (name and address):			
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. <input type="checkbox"/> Committee spent or received or expects to spend or receive in excess of \$5,000 and is required to file electronically. <input type="checkbox"/> Committee did not spend or receive or does not expect to spend or receive in excess of \$5,000 and would like to file electronically voluntarily. Further information regarding Electronic Filing can be found in Appendix D of the Committee Manual.			
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)			
Candidate: Patricia J. Richie	Date: 9/10/15	*Current Treasurer: Mark B. Richie	Date: 9/10/15
Designated Record Keeper (Required only if filing electronically): Mark B. Richie	Date: 9/10/15		



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

April 25, 2016

Keith M. Nathanson
2745 Pontiac Lake Road
Waterford, Michigan 48328

Dear Mr. Nathanson:

The Department of State received responses to the complaint you filed against Patricia Richie and Michele Economou Ureste, 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. Please submit only one rebuttal statement which addresses both answers.

Sincerely,

A handwritten signature in black ink that reads "Lori A. Bourbonais".

Lori A. Bourbonais
Bureau of Elections
Michigan Department of State

c: Patricia Richie
Michele Economou Ureste

RECEIVED/FILED
MICHIGAN DEPT OF STATE

2016 APR 22 PM 3: 41

ELECTIONS/GREAT SEAL

April 19, 2016

Lori Bourbonais
Michigan Secretary of State
Lansing, MI 48933

Re: Campaign letter filed against Patricia Richie

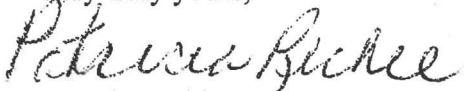
Dear Miss Bourbonais:

I am a candidate for township trustee in the 2016 primary. Keith Nathanson has filed a complaint against me and others, claiming that I violated the campaign laws by sending two documents by way of a fax machine owned by West Bloomfield Township.

I had asked both the township supervisor's assistant, and the township treasurer, as to separate documents, to fax a campaign organizational or finance statement to a governmental agency. I do not own a fax machine, and did not realize that it was improper to fax documents from the township. I had not informed the supervisor's assistant of the nature of the document.

I promise not to ask any employees to fax documents for me. I am not an employee of, or an elected official in, West Bloomfield.

Very truly yours,



Patricia Richie
5456 Bentley Road #106
West Bloomfield, MI 48322
(248) 592-0650

March 31, 2016

Department of State
Secretary of State
1st Floor
430 W. Allegan
Lansing, MI 48918

Attention: Lori Bourbonais, Bureau of Elections

Dear Lori,

In response to Keith Nathanson's complaint dated April 6, 2016, a resident, Patty Richie, upon deciding to run for township trustee in the August 2016 primary, completed her Statement of Organization. Not owning a fax machine, Miss Richie asked my assistant, Zia, to fax her Statement of Organization to the Oakland County Clerk's Office.

Miss Richie did not ask me to fax the document, and I was not aware that she had asked Zia to do so, or that Zia had faxed the one-page document to the Clerk's Office on the fax machine located in his office.

In sending the fax, Zia simply intended to assist Miss Richie, a township resident, and did not read or inquire of the nature of the document. Zia desired to help a resident, without having any intent of violating possible campaign finance laws.

It is noteworthy that Keith Nathanson is a close ally of Diane Rosenfeld Swimmer, who is a West Bloomfield Township Trustee, who frequently is opposition with me on township board issues.

Sincerely,

Michele Economou Vreste, M.P.A.

West Bloomfield Township Supervisor

2016 APR 12 AM 9:12
ELECTIONS/GREAT SEAL



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

May 10, 2016

Michele Economou Ureste
7298 Colony Drive
West Bloomfield, Michigan 48323

Patricia Richie
5356 Bentley Road #106
West Bloomfield, Michigan 48372

Dear Ms. Economou Ureste and Ms. Richie:

This letter concerns the complaint that was recently filed against each of you, 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. Ohly'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,

A handwritten signature in black ink that reads "Lori A. Bourbonais".

Lori A. Bourbonais
Bureau of Elections
Michigan Department of State

c: Keith Nathanson

RECEIVED/FILED
MICHIGAN DEPT OF STATE

2016 MAY -9 AM 10:00

CLERK OF COURTS/GREAT SEALS

May 4, 2016

Lori A. Bourbonais, Bureau of Elections
Michigan Department of State
430 West Allegan, First Floor
Lansing, MI 48918

RE: Patricia Richie, Michele Economou Ureste, Teri Weingarden

Dear Ms. Bourbonais:

Please let this letter serve as my rebuttal statement.

With respect to Ms. Richie:

Ms. Richie acknowledges she is a candidate for Trustee. She has admitted using Township Resources to send election materials by facsimile to the Oakland County Election Office. Ms. Richie claims ignorance of the law as an excuse for using Township Resources in violation of MCL 169.201 *et seq.*, more specifically MCL 169.257(1). However, Ms. Richie fails to advise you that Ms. Economou-Ureste and Ms. Weingarden are and have been involved in her campaign. Ms. Richie has been very vocal with the Oakland County Elections Office and with numerous West Bloomfield Residents that it is Ms. Economou-Ureste who is providing a large amount of campaign financing to get Ms. Richie her promotional literature, signs and other material. Ms. Economou-Ureste (and I also believe Ms. Weingarden) worked to obtain signatures on the election petitions for Ms. Richie and while the tenor of all three responses received seems to indicate no familiarity with the other, this is simply untrue.

With respect to Ms. Economou-Ureste:

Please see Ms. Economou-Ureste's connection to Ms. Richie, as detailed above. Now the Supervisor seems to implicate her own staff member, Zia Oram (who, from my review of the Township Board Meetings, was hired without the knowledge and consent of the Board of Trustees and outside of the normal hiring practices and procedures of the Township, apparently as a political favor owed by Ms. Economou-Ureste). However, Mr. Oram is Ms. Economou Ureste's direct employee and I am quite sure, aware of Ms. Richie's relationship with Ms. Economou Ureste.

In any event, this action is a clear violation of MCL 169.257(1). It is the use of public resources to provide volunteer personal services and the use of the hardware belonging to the Township for campaign purposes.

With respect to Ms. Weingarden:

Ms. Weingarden seems to indicate she had no idea what documents she was sending, however she does admit to sending campaign documents using Township resources, which is a violation. The statute does

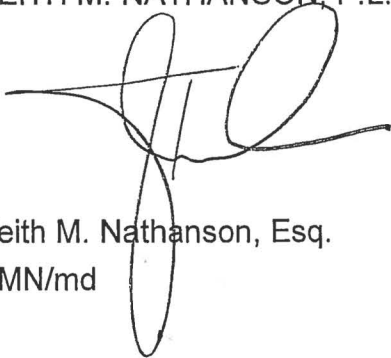
Lori A. Bourbonais, Bureau of Elections
Re: Richie, Economou-Ureste, Weingarden
Page – 2-

not require that there be a 'cost' to the township and it is immaterial that the document was faxed to a local number. Nor is it germane that she was simply trying to "help a resident".

The responses of the three are analogous to someone receiving a speeding ticket, who would attempt to defend the ticket by indicating that a) they did not know the speed limit and b) they were driving faster than allowed because they were hungry and wanted to get to the restaurant faster; and since they didn't cause an accident, personal injury or death, there really is no violation.

Sadly, this argument is without merit, as MCL 169.257 makes no exceptions as stated. The parties have admitted sending the faxes and using Township resources to do so.

Very truly yours,
KEITH M. NATHANSON, P.L.L.C.

A handwritten signature in black ink, appearing to be 'KM' with a large loop and a horizontal stroke extending to the left.

Keith M. Nathanson, Esq.
KMN/md



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

June 28, 2016

Keith M. Nathanson
2745 Pontiac Lake Road
Waterford, Michigan 48328

Dear Mr. Nathanson:

The Department of State (Department) has concluded its investigation of the complaint you filed against Patricia Richie and Michele Economou Ureste, which concerned 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.

You filed your complaint on March 30, 2016. Ms. Economou Ureste filed an answer on April 12, 2016, and Ms. Richie filed an answer on April 22, 2016. You filed a rebuttal statement with the Department on May 9, 2016.

In Michigan it is unlawful for a public body or an individual acting on its behalf to use or authorize the use of "funds, personnel, office space, computer hardware or software, property, stationery, postage, vehicles, equipment, supplies, or other public resources to make a contribution or expenditure [.]” MCL 169.257(1). A knowing violation of section 57 is a misdemeanor offense. MCL 169.257(4).

You alleged that Ms. Richie and Ms. Economou Ureste improperly used public funds by using township resources to submit Ms. Richie’s Statement of Organization. As evidence you provided a copy of Ms. Richie’s Statement of Organization, which includes an imprint from a fax machine which reads “WB Twp Supervisors Office” at the top of the page.

In response to your complaint Ms. Richie asserted that she is “not an employee of, or an elected official in, West Bloomfield.” You did not provide any evidence to the contrary.

It must first be noted that section 57 of the MCFA prohibits **a public body or an individual acting on its behalf** from using or authorizing the use of equipment, supplies, personnel, funds, or other public resources to make a contribution or expenditure. MCL 169.257(1). Because Ms. Richie is not currently a public official or township employee she is not an individual who can act on the township’s behalf or authorize the use of the township’s equipment, supplies, or other resources. Because Ms. Richie cannot authorize the use of township resources or funds, the portion of your complaint against Ms. Richie is dismissed.

Ms. Economou Ureste, in her response to your complaint, asserted that Ms. Richie asked Zia Oram (Ms. Economou Ureste’s assistant) to fax Ms. Richie’s Statement of Organization. Ms. Economou Ureste further asserts that Ms. Richie did not ask her to fax the document, nor was

Keith M. Nathanson
June 28, 2016
Page 2

she aware that Ms. Richie had asked a township employee to do so or that the document had been faxed using township resources.

Ms. Richie's response to your complaint corroborates Ms. Economou Ureste's assertions. Ms. Richie stated in her response that she asked "the township supervisor's assistant . . . to fax a campaign organizational . . . statement [.]". Additionally, no evidence has been provided to the contrary.

In the absence of any evidence that suggests otherwise, the Department takes Ms. Economou Ureste and Ms. Richie at their word that Ms. Economou Ureste did not fax the Statement of Organization for Ms. Richie. The Department also takes Ms. Economou Ureste at her word that she was not aware that Mr. Oram faxed the Statement of Organization for Ms. Richie using township resources.

Because no evidence has been provided that would support a reason to believe Ms. Economou Ureste used or authorized the use of township resources or funds to fax Ms. Richie's Statement of Organization or to further Ms. Richie's nomination or election, the portion of your complaint against Ms. Economou Ureste is also dismissed.

Sincerely,

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

Lori A. Bourbonais
Bureau of Elections
Michigan Department of State

c: Patricia Richie
Michele Economou Ureste