

April 6, 2016

Teri Weingarden 3962 Fieldview West Bloomfield, Michigan 48322

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

Dear Ms. Weingarden 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 campaign statement.

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, 1<sup>st</sup> 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

Teri Weingarden 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,

Lori'A. Bourbonais Bureau of Elections

Michigan Department of State

c: Keith Nathanson

### Campaign Finance Complaint Form Michigan Department of State

To:

This complaint form may be used to file a complaint alleging that someone violated the <u>Michigan Campaign Finance Act</u> (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:
Your Name    CENT M Namhausan   Daytime Telephone Number   248 4364833
Mailing Address  2745 Pontiac LAKE COAD  City  State  Zip  482295
Section 2. Allegen violato
Name PATLICIA RICKIE + TENT VENTUANDEN (ADERGEG) Mailing Address S356 BENTLEY HIOL 3962 Fieldview, West Bushash MI City WEST BUNTAD MI 4822  State  State  Zip  48322
Section(s) of the MCFA violated:  MCC 169.257
Explain how those sections were violated:  PLEASE SEE ATTACHED CANDIDATE COMMITTEE COVER
PAGE, MS. RICHIE + MS. WEINGARDEN ARE USING PUBLIC
RESOURCES TO CONDUCT MS. CICHIE'S CAMPAIGN. THE FAX HEADER
Townstto
Evidence that supports those allegations (attach copies of pertinent documents and other information):
PLEASE SEE ATTACHED CANDIDATE COUR. PALE
*•

From: Keith Nathanson

	with Executive from Executive and the con-	
		edge, information, and belief, formed after emstances, each factual contention of this
X		3/30/2016
	Signature of Complainant	Date

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 follow contentions are likely to be support opportunity for further inquiry. Th	ed by evidence after a reasonable	
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

Fax: +1 (517) 373-0941

From West Bloomfield Trensurers

2484514865

01/17/2016 11:53 #591 P.001/002



MICHIGAN DEPARTMENT OF STATE BUREAU OF ELECTIONS

#### CANDIDATE COMMITTEE COVER PAGE

#### FOR OFFICIAL USE ONLY

Report must be legible, typed or printed in link and the treasurer (or designated record keeper) and o	signed by	3. This Statement covers From	i isinatte		
	andidate.		10/21/15	to 12/31/15	
1. Committee LD_Number		4. Candidate Last Name		Name	M.L.
96375		Richie	Patricla	. O 115	7.
2. Committee Name		4a. Office Sought Including Dis West Bloomfield Town		Served (II applicable)	
Committee to Elect Patricia J.	Richie	4b. County of Residence. OAI	CLAND	41	1.00 s
5. Committee's Mailing Address		6. Treasuror's Name & Reside	nlial Address	중소	3
5356 Bentley Road West Bloomfield MI 48322		Mark B. Richie 5356 Bentley Road, West Bloomfield, MI			67 (Mr) 10
Area Code and Phone (248) 592-0650 If the address in this box is different from the commailing address on the Statement of Organization, be sent to this address by the filing official.		Area Code & Phone (248) 59	2-0650	: \ 	
7. Treasurer's Business Address		8. Designated Record keeper	s Name and Mailing		tee has a 📜 🔆
Mark B. Richie 5356 Bentley Road, #106 West Bloomfield, MI 48322		Designaled Record keaper)		7	.F5
Area Code and Phone (248) 592-0650	-1	Area Code and Phone			
9. TYPE OF STATEMENT		100	9e. Dissolution of	Candidate Committee	e
9a. Pre-Election OR 9b. Post-Election Pre-Election or Post-Election Statement relates to:			by the contmittee to by discharged and the committee. The	ils item I/We certify any in the candidate or his or forgiven, and no longer a committee has no ous or has any oustanding d	her spouse is here collectible from tanding assels,
Primary	Constant of	a			75
General Convention	October C	luarterly	Further, if the dissolutions of the considered a requestion of the considered and the considered are considered as the considered as the considered are considered as the considered are considered as the considered as the considered are considered as the considered are considered as the considered are considered as the considered	lulion cannot be granted at for the Reporting Wal	i, that this be iver.
Special	DC. MARRIE	m			
	Annua	Statement (2015)	Effective	date of dissolution	
School	Amer	idment to Campaign Statement			
Caucus	(Coin	plete Item 9a, 9b, 9c or 9e to le which Statement is being		on of residual funds mun ne Summary Page	st be reported on
Date of Election, Convention or Caucus					
10. Verification: IIVVe certify that all reasonable diling		To Ibo assumption of the state	I ned etterbed - t	todulos (i6 min V and 1	na bank of
mylour knowledge and belief the contents are true,			and attached scr		15/16
Current Treasurer or Designated Record keeper Type or Print Name	e	1 Male B. R. Signature	ul	- Dalo -	
Candidate Patricia J. Richle	<u> </u>	· Potrus &	Pedil	_ Date	5/1/2
Type or Print Name		Signature			

Authority-granted under P.A. 388 of 1976

From:West Bloomfold Treasurers

2484514865

01/17/2016 11:53

Fax: +1 (517) 373-0941

#591 P.002/002



#### MICHIGAN DEPARTMENT OF STATE BUREAU OF ELECTIONS

1. Cummittee I.D. Number 96375

SUMMARY PAGE

2. Committee Name Committee To Elect Patricia J. Richie

CANDIDATE COMMITTEE	2. Committee Name COMMITTEE TO E	TOOK I ANIOLA D. I VICING
RECEIPTS 3. Contributions	Column I This Period	Column II  Cumulative this election cycle
a. Itemized (Schedule 1A - Column 6)	(3a.) \$ U.00	_
b. Unilemized (loss than \$20.01 each - no Schedule)	(3b.) \$ NOT APPLICABLE	
e Sublotal of "Contributions"	(3c.) s \$0.00	(18.) s \$0.00
4 Other Receipts (Schedule 1A-1, Column 6)	(4.) \$ \$0.00	(19.) \$ \$0.00
5. TOTAL CONTRIBUTIONS AND OTHER RECEIPTS (Add Line 3c + Line 4)	(5.) \$ \$0.00	(20.) s \$0.00
N-KIND CONTRIBUTIONS & EXPENDITURES		
5. In-Kind Contributions (Schedule 1-IK, Column 7)	(6.) \$ \$0.00	(21.) \$ \$0.00
7. In-Kind Expenditures (Schedule 18-IK, Column 6)	(7.) \$ \$0.00	(22.) s \$0.00
EXPENDITURES		
8. Expenditures		98
a. (temized (Schedule 1B, Column 6)	(8a.) \$ \$0.00	41
b. Itemized Gel-Out-the-Vota (Schedule 18-G)	(8b.) \$ \$0.00	
c. Uniterrized (less than \$50.01 each - no Schedule)	(8c.) \$ \$0.00	
3. TOTAL EXPENDITURES (Add Line 8a + Line 6b + Line 8c)	(9) \$ \$0.00	(23.) \$ \$0.00
NCIDENTAL EXPENSE DISBURSEMENTS (Officeholders Only)		
10. Disbursements a. Itemized (Schedule 1C, Column 5)	(10a.) \$ \$0.00	_
b. Uniternized (less than \$50.01 each - no Schedule)	(10b.) \$ \$0.00	
11. TOTAL INCIDENTAL EXPENSE DISBURSEMENTS (Add Line 10a + Line 10b)	(11.) \$ \$0.00	(24) \$ \$0.00
DEBTS AND OBLIGATIONS 12. Debts and Obligations		
a. Owed by the Committee (Schedule 1E)	(12a.) \$ \$0.00	
b. Owed to the Committee (Schedule 15)	(12b.) \$ \$0.00	
	BALANCE STATEMENT	
Ending Balance of last report filed     (Enter zero if no previous reports have been filed.)	(13.) \$ \$0.00	
4. Amount received during reporting period	(14.) + \$ \$0.00	
(Line 5, Total Contributions & Other Receipts) 5. SUBTOTAL Add lines 13 and 14	(15) = \$_\$0.00	
6. Amount expended during reporting period	(16.) - \$ \$0.00	-
(Add lines 9 and 11) 7. ENDING BALANCE (Subtract line 15)	(16.) - \$ \(\psi \psi \cdot \c	
(Subtract line 16 from line 15)	(17.) \$	C

From:West Floomfold Treasurers

Fax: +1 (517) 373-0941

2484514865

To:

01/17/2016 11:53 #591 P.001/002



### MICHIGAN DÉPARTMENT OF STATE BURÉAU OF ELECTIONS

#### CANDIDATE COMMITTEE COVER PAGE

#### FOR OFFICIAL USE ONLY

Report must be legible, typed or printed in ink an the treasurer (or designated record keeper) and o	d algned by candidate.	3. This Statement covers From	10/21/15 10 12/31/15		
1. Committee I.D. Number		4. Candidate Last Name	First Name M.L.		
96375		Richie	Patricia J.		
2. Committee Name		4a. Office Sought Including Dis West Bloomfield Town	strict # or Community Served (II applicable)		
Committee to Elect Patricia J	. Richie	4b. County of Residence OA	-		
5. Committee's Mailing Address		6. Treasurer's Name & Residential Address			
5356 Bentley Road					
West Bloomfield MI 48322		Mark B. Richie 5356 Bentley Road, #106 West Bloomfield, Mt 48322			
Area Code and Phone (248) 592-0650 If the address in this box is different from the comminaling address on the Statement of Organization, be sent to this address by the filing official	nillee mail may	Area Code & Phone (248) 592-0650			
7. Treasurer's Business Address		8. Designated Record keeper	s Name and Mailing Address (If the committee has a		
Mark B. Richie 5356 Bentley Road, #106 West Bloomfield, MI 48322		Designaled Record keepei)	12 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		
(248) 592-0650					
Area Code and Phone (248) 592-0650		Area Code and Phone	9e. Dissolution of Candidate Committee		
9a. Pre-Election OR 9b. Post-Election  Pre-Election or Post-Election Statement relates to:		NLY if candidate ballot for the	By checking this item If We certify any outstanding debt by the committee to the candidate or his or her spouse is here by discharged and forcives, and on larger collectible from		
Primary	July Quar	1 <del>e</del> rly	the committee. The committee has no obstanding assets, owes no lates fees or has any obstanding debt.		
General	October (	Quarterly	Further, if the dissolution cannot be granted, that this be		
Convention			considered a request for the Reporting Walver.		
Special	9c. MAnnu	at Statement (2015)	Effective date of dissolution		
School		Coverage Year	Literative using of proportions		
Caucus	(Coin	ndment to Campaign Statement plete Hem 9a, 9b, 9c or 9e fo ale which Statement is being ded.)	Note: The disposition of residual funds must be reported an Schedule 18 and the Summary Page		
Date of Election, Convention or Caucus					
According to the second printing of the second second			,		
10. Verification: I/We certify that all reasonable dilig mylour knowledge and belief the contents are true;			ent and attached schedules (if any) and to the best of		
Current Treasurer or Designated Record keeper Mark B. Rich	ė	, mark B. R			
Type or Print Name		Signature	J y		
Candidate Patricla J. Richle	\$ 100.1	Signature  1 Patricia Ja	Perhal Date 1/15/110		
Type or Print Name	•	Signature			

Authority granted under P.A. 388 of 1976

From:West Bloomtleid Treasurers

2484514865

01/17/2016 11:53

#591 P.002/002



From: Keith Nathanson

#### MICHIGAN DEPARTMENT OF STATE BUREAU OF ELECTIONS

1. Committee I.D. Number 96375

SUMMARY PAGE

2, Committee Name Committee To Elect Patricia J. Richie

CANDIDATE COMMITTEE	2, Committee Name	
RECEIPTS	Çolumn i This Period	Column II  Cumulative this election cycle
3. Contributions		
a. (temized (Schedule 1A - Column 6)	(3a.) \$ 0.00	_
h. Unitensized (less than \$20.01 each - no Schedulo)	(3b.) \$ NOT APPLICABLE	<b>-</b>
c Subluta of "Contributions"	(3c.) \$ \$0.00	(18.) \$ \$0.00
4. Other Receipts (Schedule 1A-1, Column 6)	(4.) \$ \$0.00	
5. TOTAL CONTRIBUTIONS AND OTHER RECEIPTS (Add Line 3c + Line 4)	(5.) \$ \$0.00	(20.) \$ \$0.00
IN-KIND CONTRIBUTIONS & EXPENDITURES		
6. In-Kind Contributions (Schedule 1-IK, Column 7)	(6.) \$ \$0.00	(21.) \$ \$0.00
7. In-Kind Expenditures (Schedule 18-IK, Column 6)	(7.) \$ \$0.00	(22.) s \$0.00
EXPENDITURES		
8. Expenditures		
a. (ternized (Schedule 1B, Column 6)	(Ea.) \$ \$0.00	_ /
b. Iternized Gel-Out-the-Vote (Schedule 1B-G)	(85.) \$ \$0.00	_
c. Uniternized (less than \$50.01 each - no Schedule)	(8c.) \$ \$0.00	
9. TOTAL EXPENDITURES (Add Line 8a + Line 8b + Line 8c)	(9.) \$ \$0.00	(23.) \$ \$0.00
INCIDENTAL EXPENSE DISBURSEMENTS (Officeholders Only)		
10. Disbursements a. Itemized (Schedulc 1C, Column 8)	(10a.) \$ \$0.00	
b. Uniterritzed (less than \$50.01 each - no Sufredule)	(10b.) \$ \$0.00	
11. TOTAL INCIDENTAL EXPENSE DISBURSEMENTS (Add Line 10a + Line 10b)	(11.) \$ \$0.00	(24.) \$ \$0.00
DEBTS AND OBLIGATIONS 12. Debts and Obligations	(11.) \$ 40.00	(24.) \$ 40.00
a Owed by the Committee (Schedule 1E)	(12a.) \$ \$0.00	
b. Owed to the Committee (Schedule 1E)	(125.) \$ \$0.00	
	(12b.) \$ \$0.00 BALANCE STATEMENT	
3. Ending Balance of last report filed	(13.) \$ \$0.00	
(Enter zero if no previous reports have been filed.) 4. Amount received during reporting period	(14.) + \$ \$0.00	ar in bequame
(Line 5, Total Contributions & Other Receipts)  15. SUBTOTAL Add tines 13 and 14	(15.) = \$ \$0.00	
6. Amount expended during reporting period	(16.) - \$ \$0.00	
(Add lines 9 and 11) 17 ENDING BALANCE		
(Subtract line 16 from line 15)	(17.) \$ \$0.00	

To:

WB Twp Supervisors Office

Fax: +1 (517) 373-0941

Page 11 of 13 03/30/2016 4:19 PM

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MICHIGAN DEPARTMENT OF STATE **BUREAU OF ELECTIONS** 

#### ORIGINAL OR AMENDED

	STATEMENT OF ORGANI	ZATION FORM FOR CANDIDAT	COMMITTEES		
1. Committee ID #:	*2. Type of Filing: 区 Origin		54 mars 0 10 15		
96373	land .	dment to items:	Eff. Date: 9-10-15		
*3. Full Name of Committee (must include		ne):	J. Richie		
*4a. Candidate Full Name: Last Name	o Elect	First Name	J. MICHIE		
KICHI	e	FATRICIA	<u> </u>		
*4b. Political Party (if applicable): RH	OCRAT	*4c. County of Residence: (	PAKLAND		
	Two trustee	*4e. District/Circuit # or Juris	diction:		
*5. Date Committee was Formed: 9-1	0-2015		50 8 58		
*6a. Committee Phone: 2 48 592	0650	6b. Committee Fax #:			
6c. Committee Email Address:		6d. Committee Website Addr	essi ET 3		
*7a. Complete Committee Mailing Address 5356 Bruffeu Rd E	106 West Bloc	oufield, MICHIE	AN 48322 =		
*7b. Complete Committee Street Address	(May not be PO Box): \$106 WEST BI	ontifield MICH	571 (4)		
*8. Treasurer Name and Complete Addres	5. Richie				
Phone #: 248 592065C	) Email Addr	THE T. C.			
9. Designated Record Keeper Name and C MARK B. RICHTE	5356 BLNHL	1R1,4106 WES.	+ Blootfield, MICHIGAD		
Phone #: 248 592 0650	-3		4832		
*10. REPORTING WAIVER REQUEST:					
			re or expend in excess of \$1,000 in an <u>election</u> . , the committee does not owe Pre, Post, Quarteri		
			natically lost if the committee exceeds the \$1,000		
			a committee from filing Late Contribution		
Reports.					
NO. I/WE DO NOT WANT TO APPLY E	OR THE REPORTING WAIVER	The committee expects to rece	ive or expend in excess of \$1,000 in an election		
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 furth	ner understand that the Repor	ting Waiver cannot be requeste	d retroactively to avoid filing requirements and		
to avoid paying late filing fees. Furth					
this item must be completed an account of	ines not have to be opened unt	il the first contribution is receive	redit Union or Savings & Loan Association) While		
"Official Depository (name and address)	BANK OF A	MERICA 6120	Haple Rd, West Bloomfield		
	0	, 0, 1, 0, 1, 0	mi 48322		
Secondary Depository (name and address	255):				
<ol> <li>This Item applies only to Gubernate expenditures.</li> </ol>	torial Candidate Committees: {	Check If this committee intends	to seek qualifying contributions or make qualifyin		
		Michigan Department of State	Bureau of Elections only and does not apply to		
Candidate Committees that file with the Committee spent or received or expec		s of \$5,000 and is required to file	e electronically.		
Committee did not spend or receive of Further information regarding Electro			rould like to file electronically voluntarily.		
			ment and that the contents are true, accurate and		
			atures below shall serve as the signatures that		
			fy that all reasonable diligence will be used in the		
best of my/our knowledge or bellef. (Sign !		mat the contents of each staten	nent will be true, accurate and complete to the		
'Qndidate:	2 / /	*Current Treasurer	0 0 -11		
Jatricia & Beakle	Date: 4/10/2015	Mark B.	Freda Date: 9/10/15		
Designated Record Reper (Required only	If tiling electronically)		Date: 9/19/15		

From:West Bloomfield Treasurers 2484514865

01/17/2016 11:53 #591 P.001/002



### MICHIGAN DEPARTMENT OF STATE BUREAU OF ELECTIONS

#### CANDIDATE COMMITTEE COVER PAGE

#### FOR OFFICIAL USE ONLY

OUVERTMOL				
Report must be legible, typed or printed in ink and the treasurer (or designated record keeper) and ca	signed by andidate,	3. This Statement covers From	10/21/15 to	12/31/15
1. Committee I.D. Number		4. Candidate Last Name	First Name	M.I.
96375		Richie	Patricia	J.
2. Committee Name		4a. Office Sought Including Dis		d (If applicable)
K.		West Bloomfield Town	nship i rustee	
Committee to Elect Patricia J.	Richie	4b. County of Residence OA	KLAND	65 (6)
5. Committee's Mailing Address		6. Treasurer's Name & Reside	ential Address	3 B = 1
5356 Bentley Road		Mark B. Richie		TO 5 -0
West Bloomfield MI 48322		5356 Bentley Road,	#106	-12 5= ==
		West Bloomfield, MI	48322	They
				( \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \
Area Code and Phone (248) 592-0650				
If the address in this box is different from the commi- mailing address on the Statement of Organization, in	ttee nall may	(0.40) 50	22.0050	
be sent to this address by the filing official.		Area Code & Phone (248) 59	32-0650	- 0 0
7. Treasurer's Business Address		8. Designated Record keeper	's Name and Mailing Addres	ss (If the committee has a
Mark B. Richie		Designated Record keeper)		20
5356 Bentley Road, #106				
West Bloomfield, MI 48322				
Area Code and Phone (248) 592-0650	1	santos e e carico		
		Area Code and Phone	9e. Dissolution of Cand	idate Committee
9. TYPE OF STATEMENT	Required ON	ILY if candidate		
9a. Pre-Election OR 9b. Post-Election	is not on the current year:		By checking this item by the committee to the ca	I/We certify any outstanding debt andidate or his or her spouse is here
Pre-Election or Post-Election Statement relates to:			the committee. The comm	indidate or his or her spouse is here n, and no longer collectible from hittee has no oustanding assets.
Primary	July Quart		owes no lates fees or has a	any oustanding debt.
General	October Q	uarterly	Further, if the dissolution c	annot be granted, that this be
Convention			considered a request for th	ie Reponing Walver.
Special	9c. Annua	Statement (2015)		
School		Coverage Year	Effective date of	dissolution
Caucus		dment to Campaign Statement		
		lete Item 9a, 9b, 9c or 9e to e which Statement is being		sidual funds must be reported on
	amend	ed.)	Schedule 1B and the Sum	mary Page
Date of Election, Convention or Caucus				
			E	
10. Verification: I/We certify that all reasonable dilige	nce was used i	n the preparation of this stateme	ent and attached schedules	(if any) and to the hest of
mylour knowledge and belief the contents are true, a				115/16
Current Treasurer or Mark B. Richie	4	m 000	10	1/10/16
Designated Record keeper	,	1 Jack D. K	O.1.0	
Type or Print Name		Signature	-	,
Candidate Patricia J. Richie		· Patricia It	Cutil Date	1/15/110
Type or Print Name		Signature //		•

To:

From:Wost Bloomfold Trassurars

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01/17/2016 11:53

#591 P.002/002



#### MICHIGAN DEPARTMENT OF STATE BUREAU OF FLECTIONS

1. Committee I.D. Number 96375

**SUMMARY PAGE** 

2. Committee Name Committee To Elect Patricia J. Richie

CANDIDATE COMMITTEE	2. Committee Name Committee 10	Liout attion of thems
RECEIPTS	Column I This Period	Column II Cumulative this election cycle
3. Contributions	, , ,	,
a. Itemized (Schedule 1A - Column 6)	(3a.) \$ 0.00	-
b. Unitemized (less than \$20.01 each - no Schedule)	(3b.) \$ NOT APPLICABLE	-
c. Subtotal of "Contributions"	(3c.) \$ \$0.00	(18.) \$ \$0.00
4. Other Receipts (Schedule 1A -1, Column 6)	(4.) \$ \$0.00	(19.) \$ \$0.00
5. TOTAL CONTRIBUTIONS AND OTHER RECEIPTS (Add Line 3c + Line 4)	(5.) \$ \$0.00	(20.) \$ \$0.00
N-KIND CONTRIBUTIONS & EXPENDITURES		
6. In-Kind Contributions (Schedule 1-IK, Column 7)	(6.) \$ \$0.00	(21.) \$ \$0.00
7. In-Kind Expenditures (Schedule 18-IK, Cotumn 6)	(7.) \$ \$0.00	(22.) \$ \$0.00
EXPENDITURES		
8. Expenditures		
a. Itemized (Schedule 1B, Column 6)	(8a.) \$ \$0.00	A
b. Itemized Get-Out-the-Vote (Schedule 1B-G)	(8b.) \$ \$0.00	
c. Unitemized (less than \$50.01 each - no Schedule)	(8c.) \$ \$0.00	_
9. TOTAL EXPENDITURES (Add Line 8a + Line 8b + Line 8c)	(9.) \$ \$0.00	(23.) \$ \$0.00
NCIDENTAL EXPENSE DISBURSEMENTS Officeholders Only)		
10. Disbursements a. Itemized (Schedule 1C, Column 8)	(10a.) \$ \$0.00	-
b. Uniternized (less than \$50.01 each - no Schodule)	(10b.) \$ \$0.00	
1. TOTAL INCIDENTAL EXPENSE DISBURSEMENTS (Add Line 10a + Line 10b)	(11.) \$ \$0.00	(24.) \$ \$0.00
DEBTS AND OBLIGATIONS 12. Debts and Obligations		
a. Owed by the Committee (Schedule 1E)	(12a.) \$ \$0.00	~
b. Owed to the Committee (Schedule 1E)	(12b.) \$ \$0.00	
	BALANCE STATEMENT	
Ending Balance of last report filed     (Enter zero if no previous reports have been filed.)	(13.) \$ \$0.00	
Amount received during reporting period     (Line 5, Total Contributions & Other Receipts)	(14.) + \$ \$0.00	
SUBTOTAL Add lines 13 and 14     Amount expended during reporting period	(15.) = \$_\$0,00	
d. Amount expended during reporting period (Add lines 9 and 11) 7. ENDING BALANCE	(16.) - \$ \$0.00	
	(17.) \$ \$0.00	



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 Teri Weingarden, 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,

Lori A. Bourbonais Bureau of Elections

Michigan Department of State

c: Patricia Richie Teri Weingarden April 19, 2016

RECEIVED/FILED MICHIGAN DEPT OF STATE 2016 APR 22 PM 3: 41

ELECTIONS/GREAT SEAL

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

#### **Bourbonais, Lori (MDOS)**

From:

Teri Weingarden < thweingarden@yahoo.com>

Sent:

Tuesday, April 12, 2016 11:19 AM

To:

Bourbonais, Lori (MDOS)

Subject:

MCFA complaint: Teri Weingarden, West Bloomfield Township

Dear Ms. Bourbonais,

Resident Patricia Richie stopped by my counter at the Township seeking assistance with a variety of questions and concerns, many of which were not related to her decision to run for public office. I always try to be helpful to my residents. I believe my role as Treasurer is to assist residents in as many ways as I can. I often try to connect my residents with other resources. I sometimes call or send items to the County Treasurer, County Clerk/Register of Deeds, Mortgage company, Step forward program, etc. to help residents facing foreclosure or other hardships. I participate the Clergy/Community Association to stay aware of programs and services available to members of the community.

Ms. Richie was recently discharged from the hospital and had mobility issues and a lack of transportation, as she shares a car with a spouse who works three jobs. She seemed deeply concerned about sending some documentation to Oakland County. I did offer to fax her documents as a service. I consider customer service my top priority. Since a fax is a phone call on a local line, there is no cost to the township. I was just trying to assist a resident in sending a document to the County. I do not believe this qualifies as a violation of the Michigan Campaign Finance Act as this was not a contribution or expenditure, but I am still very sorry.

Thank you,

Teri Weingarden

2016 APR 12 AM II: 24 ELECTICNS/GREAT SEA



May 10, 2016

Teri Weingarden 3962 Fieldview West Bloomfield, Michigan 48322

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

Dear Ms. Weingarden 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. Nathanson'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

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c: Keith Nathanson

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2745 Pontiac Lake Road Waterford, MI 48328

Telephone (248) 436-4833
Facsimile (248) 636-1306
Email: kn@nathanson-law.com
www.nathanson-law.com

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. Riche 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 reasources 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.

Keith M. Nathanson, Esq.

KMN/md



June 28, 2016

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

Dear Mr. Nathanson:

The Department of State (Department) has concluded its initial investigation of the complaint you filed against Patricia Richie and Teri Weingarden, 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 as it relates to Patricia Richie.

You filed your complaint on March 30, 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 improperly used public funds by using township resources to submit her campaign statement. As evidence you provided a copy of Ms. Richie's Annual campaign statement, which includes an imprint from a fax machine which reads "West Bloomfield Treasurers" 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 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

Keith M. Nathanson June 28, 2016 Page 2

resources. Because Ms. Richie cannot authorize the use of township resources or funds, the portion of your complaint against Ms. Richie is dismissed.

Sincerely, Grani A Bernancus

Lori A. Bourbonais Bureau of Elections

Michigan Department of State

c: Patricia Richie