



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

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, 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

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,

A handwritten signature in black ink that reads "Lori A. Bourbonais". The signature is written in a cursive, flowing style.

Lori A. Bourbonais
Bureau of Elections
Michigan Department of State

c: Keith Nathanson

Campaign Finance Complaint Form Michigan Department of State

This complaint form may be used to file a complaint alleging that someone violated the Michigan Campaign Finance Act (the MCFA, 1976 PA 388, as amended; MCL 169.201 *et seq.*). All information on the form must be provided along with an original signature and evidence. **Please print or type all information.**

I allege that the MCFA was violated as follows:

Section 1: Complainant		
Your Name KEITH M. NATHANSON	Daytime Telephone Number 248 4364833	
Mailing Address 2745 Pontiac Lake Road		
City Warren	State MI	Zip 48328

Section 2: Alleged Violator		
Name PATRICIA RICHIE + TERI WEINGARDEN (ADLERBERG)		
Mailing Address 5356 Bentley #106 3962 Fieldview, West Bloomfield, MI		
City West Bloomfield MI 48322	State	Zip 48322

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

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. RICHIE'S CAMPAIGN. THE FAX HEADER IS THAT OF TERI WEINGARDEN'S OFFICE AT WEST BLOOMFIELD TOWNSHIP

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

PLEASE SEE ATTACHED CANDIDATE COVER PAGE

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.

☒

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:

☒

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

From West Bloomfield Treasurers

2484514865

01/17/2016 11:53

#591 P.001/002

MICHIGAN DEPARTMENT OF STATE
BUREAU OF ELECTIONSCANDIDATE COMMITTEE
COVER PAGE

FOR OFFICIAL USE ONLY

Report must be legible, typed or printed in ink and signed by
the treasurer (or designated record keeper) and candidate.

1. Committee I.D. Number 96375		3. This Statement covers From: <u>10/21/15</u> to <u>12/31/15</u>	
2. Committee Name Committee to Elect Patricia J. Richie		4. Candidate Last Name Richie First Name Patricia M.I. J. 4a. Office Sought Including District # or Community Served (If applicable) West Bloomfield Township Trustee 4b. County of Residence OAKLAND	
5. Committee's Mailing Address 5356 Bentley Road West Bloomfield MI 48322 Area Code and Phone: <u>(248) 592-0650</u> <small>If the address in this box is different from the committee mailing address on the Statement of Organization, mail may be sent to this address by the filing official.</small>		6. Treasurer's Name & Residential Address Mark B. Richie 5356 Bentley Road, #106 West Bloomfield, MI 48322 Area Code & Phone: <u>(248) 592-0650</u>	
7. Treasurer's Business Address Mark B. Richie 5356 Bentley Road, #106 West Bloomfield, MI 48322 Area Code and Phone: <u>(248) 592-0650</u>		8. Designated Record keeper's Name and Mailing Address (If the committee has a Designated Record keeper) Area Code and Phone: _____	
9. TYPE OF STATEMENT 9a. <input type="checkbox"/> Pre-Election OR 9b. <input type="checkbox"/> Post-Election Pre-Election or Post-Election Statement relates to: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Convention <input type="checkbox"/> Special <input type="checkbox"/> School <input type="checkbox"/> Caucus Date of Election, Convention or Caucus: _____		Required ONLY if candidate is not on the ballot for the current year <input type="checkbox"/> July Quarterly <input type="checkbox"/> October Quarterly 9c. <input checked="" type="checkbox"/> Annual Statement <u>2015</u> Coverage Year 9d. <input type="checkbox"/> Amendment to Campaign Statement (Complete Item 9a, 9b, 9c or 9e to indicate which Statement is being amended.)	
		9e. Dissolution of Candidate Committee <input type="checkbox"/> By checking this item I/We certify any outstanding debt by the committee to the candidate or his or her spouse is hereby discharged and forgiven, and no longer collectible from the committee. The committee has no outstanding assets, owes no late fees or has any outstanding debt. Further, if the dissolution cannot be granted, that this be considered a request for the Reporting Waiver. Effective date of dissolution: _____ Note: The disposition of residual funds must be reported on Schedule 1B and the Summary Page	
10. Verification: I/We certify that all reasonable diligence was used in the preparation of this statement and attached schedules (if any) and to the best of my/our knowledge and belief the contents are true, accurate and complete.			
Current Treasurer or Designated Record keeper: Mark B. Richie Type or Print Name: _____ Signature: <u>Mark B. Richie</u> Date: <u>1/15/16</u>			
Candidate: Patricia J. Richie Type or Print Name: _____ Signature: <u>Patricia J. Richie</u> Date: <u>1/15/16</u>			

From West Bloomfield Treasurers

2484514865

01/17/2016 11:53

H591 P 002/002



MICHIGAN DEPARTMENT OF STATE
BUREAU OF ELECTIONS

1. Committee I.D. Number 963752. Committee Name Committee To Elect Patricia J. Richie

**SUMMARY PAGE
CANDIDATE COMMITTEE**

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

From: West Bloomfield Treasurers

248.514.865

01/17/2016 11:53

#591 P.001/002

MICHIGAN DEPARTMENT OF STATE
BUREAU OF ELECTIONSCANDIDATE COMMITTEE
COVER PAGE

FOR OFFICIAL USE ONLY

Report must be legible, typed or printed in ink and signed by
the treasurer (or designated record keeper) and candidate.

1. Committee I.D. Number 96375		3. This Statement covers From: 10/21/15 to 12/31/15	
2. Committee Name Committee to Elect Patricia J. Richie		4. Candidate Last Name Richie First Name Patricia M.I. J. 4a. Office Sought Including District #, or Community Served (If applicable) West Bloomfield Township Trustee 4b. County of Residence OAKLAND	
5. Committee's Mailing Address 5356 Bentley Road West Bloomfield MI 48322 Area Code and Phone (248) 592-0650 <small>If the address in this box is different from the committee mailing address on the Statement of Organization, mail may be sent to this address by the filing official.</small>		6. Treasurer's Name & Residential Address Mark B. Richie 5356 Bentley Road, #106 West Bloomfield, MI 48322 Area Code & Phone (248) 592-0650	
7. Treasurer's Business Address Mark B. Richie 5356 Bentley Road, #106 West Bloomfield, MI 48322 Area Code and Phone (248) 592-0650		8. Designated Record keeper's Name and Mailing Address (If the committee has a Designated Record keeper) Area Code and Phone _____	
9. TYPE OF STATEMENT 9a. <input type="checkbox"/> Pre-Election OR <input type="checkbox"/> Post-Election Pre-Election or Post-Election Statement relates to: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Convention <input type="checkbox"/> Special <input type="checkbox"/> School <input type="checkbox"/> Caucus Date of Election, Convention or Caucus _____		Required ONLY if candidate is not on the ballot for the current year: <input type="checkbox"/> July Quarterly <input type="checkbox"/> October Quarterly 9c. <input checked="" type="checkbox"/> Annual Statement (2015) Coverage Year 9d. <input type="checkbox"/> Amendment to Campaign Statement (Complete Item 9a, 9b, 9c or 9e to indicate which Statement is being amended.)	
		9e. Dissolution of Candidate Committee <input type="checkbox"/> By checking this item I/We certify any outstanding debt by the committee to the candidate or his or her spouse is here by discharged and forgiven, and no longer collectible from the committee. The committee has no outstanding assets, owes no rates fees or has any outstanding debt. Further, if the dissolution cannot be granted, that this be considered a request for the Reporting Waiver. Effective date of dissolution _____ Note: The disposition of residual funds must be reported on Schedule 1B and the Summary Page	
10. Verification: I/We certify that all reasonable diligence was used in the preparation of this statement and attached schedules (if any) and to the best of my/our knowledge and belief the contents are true, accurate and complete.			
Current Treasurer or Designated Record keeper Mark B. Richie Type or Print Name		Signature <i>Mark B. Richie</i> Date 1/15/16	
Candidate Patricia J. Richie Type or Print Name		Signature <i>Patricia J. Richie</i> Date 1/15/16	

From: West Bloomfield Treasurers

2484514865

01/17/2016 11:53

#591 P 002/002



MICHIGAN DEPARTMENT OF STATE
BUREAU OF ELECTIONS

1. Committee ID Number 963752. Committee Name Committee To Elect Patricia J. Richie

**SUMMARY PAGE
CANDIDATE COMMITTEE**

RECEIPTS	Column I This Period	Column II Cumulative this election cycle
3. Contributions		
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IN-KIND CONTRIBUTIONS & EXPENDITURES		
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a. Itemized (Schedule 1B, Column 6)	(8a.) \$ <u>\$0.00</u>	
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9. TOTAL EXPENDITURES (Add Line 8a + Line 8b + Line 8c)	(9.) \$ <u>\$0.00</u>	(23.) \$ <u>\$0.00</u>
INCIDENTAL EXPENSE DISBURSEMENTS (Officeholders Only)		
10. Disbursements		
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BALANCE STATEMENT		
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14. Amount received during reporting period (Line 5, Total Contributions & Other Receipts)	(14.) + \$ <u>\$0.00</u>	
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WB Twp Supervisors Office

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MICHIGAN DEPARTMENT OF STATE
BUREAU OF ELECTIONSORIGINAL 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 received 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. <u>A Reporting Waiver does not exempt a committee from filing Late Contribution Reports.</u>				
<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
Designated Record Keeper (Required only if filing electronically): Mark B. Richie		Date: 9/10/15		

From: West Bloomfield Treasurers

2484514865

01/17/2016 11:53

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MICHIGAN DEPARTMENT OF STATE
BUREAU OF ELECTIONSCANDIDATE COMMITTEE
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Current Treasurer or Designated Record keeper Mark B. Richie Type or Print Name		Mark B. Richie Signature Date 1/15/16	
Candidate Patricia J. Richie Type or Print Name		Patricia J. Richie Signature Date 1/15/16	

From: West Bloomfield Treasurer

2484514865

01/17/2016 11:53

#591 P.002/002



MICHIGAN DEPARTMENT OF STATE
BUREAU OF ELECTIONS

1. Committee I.D. Number 963752. Committee Name Committee To Elect Patricia J. Richie

**SUMMARY PAGE
CANDIDATE COMMITTEE**

RECEIPTS	Column I This Period	Column II Cumulative this election cycle
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c. Subtotal of "Contributions"	(3c.) \$ <u>\$0.00</u>	(18.) \$ <u>\$0.00</u>
4. Other Receipts (Schedule 1A -1, Column 6)	(4.) \$ <u>\$0.00</u>	(19.) \$ <u>\$0.00</u>
5. TOTAL CONTRIBUTIONS AND OTHER RECEIPTS (Add Line 3c + Line 4)	(5.) \$ <u>\$0.00</u>	(20.) \$ <u>\$0.00</u>
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6. In-Kind Contributions (Schedule 1-IK, Column 7)	(6.) \$ <u>\$0.00</u>	(21.) \$ <u>\$0.00</u>
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EXPENDITURES		
8. Expenditures		
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BALANCE STATEMENT		
13. Ending Balance of last report filed (Enter zero if no previous reports have been filed.)	(13.) \$ <u>\$0.00</u>	
14. Amount received during reporting period (Line 5, Total Contributions & Other Receipts)	(14.) + \$ <u>\$0.00</u>	
15. SUBTOTAL Add lines 13 and 14	(15.) = \$ <u>\$0.00</u>	
16. Amount expended during reporting period (Add lines 9 and 11)	(16.) - \$ <u>\$0.00</u>	
17. ENDING BALANCE (Subtract line 16 from line 15)	(17.) \$ <u>\$0.00</u>	



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 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,

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

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

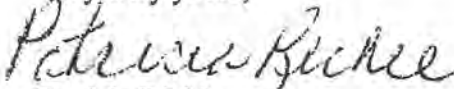
Dear Miss Bourbonais:

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 11:24
ELECTIONS/GREAT SEAL



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

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

c: Keith Nathanson

RECEIVED/FILED
MICHIGAN DEPT OF STATE

2016 MAY -9 AM 10:0

...TIONS/GREAT SE

Law Offices of
Keith M. Nathanson, PLLC

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. 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

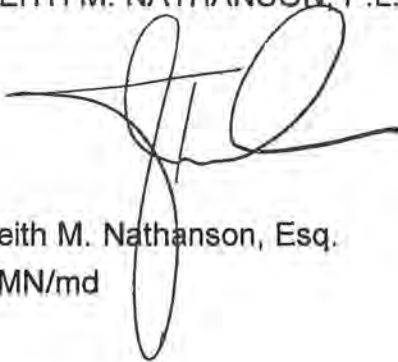
Lori A. Bourbonais, Bureau of Elections
Re: Richie, Economou-Ureste, Weingarden
Page – 2-

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, stylized loop at the end.

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 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,

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: Patricia Richie



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

June 29, 2016

Teri Weingarden
3962 Fieldview
West Bloomfield, Michigan 48322

Dear Ms. Weingarden:

The Department of State (Department) has completed its initial investigation of the complaint filed against you by Keith Nathanson, which alleged that you violated section 57 of the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.257. This letter concerns the disposition of Mr. Nathanson's complaint.

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).

The Act also 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, and if the Department is unable to correct or prevent additional violations, it must ask the Attorney General to prosecute if a crime has been committed. MCL 169.215(10)(a). The objective of an informal resolution is “to correct the violation or prevent a further violation [.]” *Id.*

Mr. Nathanson filed his complaint on March 30, 2016. You filed an answer on April 12, 2016, and Mr. Nathanson filed a rebuttal statement on May 9, 2016.

Mr. Nathanson alleged that you improperly used township resources to fax a campaign statement for Patricia Richie.

As evidence, Mr. Nathanson provided a copy of Ms. Richie's Annual campaign statement. It appears that this statement was 2 pages long. At the top of each page is an imprint which reads “West Bloomfield Treasurers [.]”

In your response you stated that you did fax Ms. Richie's document as a service to her. However, you asserted in your answer that because “a fax is a phone call on a local line, there is no cost to the township [.]” and no violation occurred. The Department disagrees.

Because you admit to using the West Bloomfield Township fax machine or server to fax Ms. Richie's campaign finance statement, the Department concludes that that there may be a reason

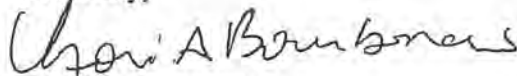
Teri Weingarden
June 29, 2016
Page 2

to believe that a violation of section 57 of the Act occurred. Upon making this determination the Department is required by law to attempt to resolve the matter informally. MCL 169.215(10).

Please calculate the amount of public resources expended for use of the fax machine or server, and reimburse West Bloomfield Township for this amount. Please provide your proof of payment to the Department at P.O. Box 20126, Lansing, Michigan 48901-0726 or by fax to 517-373-0941 no later than July 8, 2016. The Department will use this information to facilitate an informal resolution of Mr. Nathanson's complaint.

Please be advised that if the Department is unable to resolve the matter through informal methods, the Department must refer the matter to the Attorney General for enforcement of the criminal penalty provided in MCL 169.257(4). MCL 169.215(10)(a).

Sincerely,

A handwritten signature in cursive script, appearing to read "Lori A. Bourbonais".

Lori A. Bourbonais
Bureau of Elections
Michigan Department of State

Bourbonais, Lori (MDOS)

From: Teri Weingarden <thweingarden@yahoo.com>
Sent: Sunday, July 24, 2016 9:36 PM
To: Bourbonais, Lori (MDOS)
Subject: Response to campaign finance violation

In response to the campaign finance violation accusation.

After researching labor costs, fax machine (click) costs and phone expenses, I have determined that sending a 2 page fax would have cost the township 20 cents.

Here is the basis for my calculation:

COPY/FAX MACHINE

We pay Konica \$0.10 per image (which would include faxing). I faxed two pages/images so the total cost would be $.10 \times 2.0 = .20$ (20 cents).

PHONE CALL/FAX

The township's AT&T independent line has a monthly cost. The township pays for the line no matter how many or few faxes are sent and received. If this was a long distance/international fax it is possible there could be additional costs - but this was a local fax. So there was no additional cost to the township for sending the fax.

WAGES

The cost of my time to the township is \$0. I am a salaried employee. I do not complete a timesheet. Only the three elected officials do not need to complete time sheets since our salary is the same regardless of the hours worked.

Per the Charter Township Act and General Law Township Act, the elected officials' salary and the Trustee per meeting compensation is determined by the Township Board. MCL 42.6 and MCL 41.95. Further, MCL 42.6 and 41.95 provide that the salary of an elected official shall not be decreased during the official's term of office. Clearly, then, the salary of an elected official may not be reduced regardless of the number of hours or days that individual does or does not work.

Please let me know if my research and calculations meet your approval.

If so, I am willing to reimburse the township 20 cents.

I will have to work with Finance to determine how to receipt 20 cents since we do not have a General Ledger account that would meet this type of revenue. We no longer have misc funds or petty cash so I cannot use those accounts.

Thank you,

Teri Weingarden



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

February 2, 2017

Teri Weingarden
3962 Fieldview
West Bloomfield, Michigan 48322

Dear Ms. Weingarden:

The Department of State (Department) has concluded its investigation of the complaint filed against you by Keith Nathanson, which alleged that you violated section 57 of the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.257. This letter concerns the disposition of Mr. Nathanson's complaint, which was filed on March 30, 2106. You filed an answer to the complaint on April 12, 2016, and Mr. Nathanson filed a rebuttal statement on May 9, 2016. At the Department's request, you provided additional information on July 24, 2016.

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. Nathanson alleged that you improperly used township resources to fax a campaign statement for Patricia Richie.

The MCFA prohibits a public body or an individual acting on its behalf from "us[ing] or authoriz[ing] 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).

By letter dated June 29, 2016, the Department notified you of its determination that the evidence provided supported a conclusion that a violation of the Act had occurred. The Department requested that you provide the Department with "the amount of public resources expended for use of the fax machine or server" and asked you to reimburse the township for this amount.

You provided this information to the Department in an email sent on July 24, 2016. You indicated that the township pays 10 cents per image for the fax machine. You faxed 2

Teri Weingarden

February 2, 2017

Page 2

pages for Ms. Richie for a total of 20 cents. You were unsure at the time of that writing how you would reimburse the township for 20 cents.

You further stated that the cost of your time to fax the 2 pages was \$0.00 because you are a salaried employee and your salary is the same regardless of how many hours you work. The Department disagrees with your assessment. As a salaried township treasurer, the expectation is that you are performing township functions while you are on township property using township resources. Any time you spent helping Ms. Richie with her campaign-related business diverted your attention from the ordinary business of the township and is permanently lost.

The Department has determined that an expenditure was made with regard to campaign statement that you faxed on Ms. Richie's behalf. Having made this determination, 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. Nathanson's complaint against you informally through execution of the enclosed conciliation agreement, which requires you to pay a civil fine in the amount of \$50.00. **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 \$50.00 fine, on or before February 17, 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 your 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. Nathanson'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 you for the crime of expending public funds to make an expenditure, a misdemeanor violation of MCL 169.257(1); 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 of triple the amount of each improper expenditure, plus up to \$1,000.00 for each violation of the Act.

Sincerely,



Lori A. Bourbonais

Bureau of Elections

Michigan Department of State



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

2017 FEB -9 AM 11:02
ELECTIONS/GREAT SEAL

In the Matter of:

**Teri Weingarden
3962 Fieldview
West Bloomfield, Michigan 48322**

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 Teri Weingarden (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 §169.257(1) by making an improper expenditure by faxing a campaign finance statement using township resources.

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 she will comply with the Act and the Rules promulgated to implement the Act.

By executing this conciliation agreement, Respondent certifies that a civil fine in the amount of \$50.00 has been paid 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.

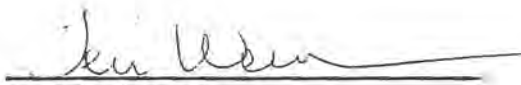
The Secretary of State and Respondent finally agree that the signatories below are authorized to enter into and bind the parties to this agreement, and have done so by signing this agreement on the date below.

**RUTH JOHNSON
SECRETARY OF STATE**



Christopher M. Thomas, Director
Bureau of Elections

RESPONDENT



Teri Weingarden

Date: 2/13/2017

Date: 2/16/17