



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

May 20, 2014

Kenneth E. Crider
16381 Fairway Street
Livonia, Michigan 48154

Dear Mr. Crider:

The Department of State (Department) received a formal complaint filed against you by Brad Moss, alleging a violation of 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.

The Act's definition of a candidate includes an individual who "[r]eceives a contribution, makes an expenditure, or gives consent for another person to receive a contribution or make an expenditure with a view to bringing about the individual's nomination or election to an elective office, whether or not the specific elective office for which the individual will seek nomination or election is known at the time the contribution is received or the expenditure is made." MCL 169.203(1)(c). The Act further requires an individual to form a candidate committee within 10 days once the individual becomes a candidate under the definition provided in the Act. MCL 169.203(2), 169.221(1). A committee shall file a statement of organization within 10 days of its formation. MCL 169.224(1). Late fees may be incurred if the statement of organization is filed late. *Id.* Failure to file a statement of organization for more than 30 days is a misdemeanor. *Id.*

Mr. Moss alleges that you did not file your Statement of Organization in a timely manner for your candidate committee.

The Act further requires candidate committees to file complete and accurate campaign finance statements and reports. MCL 169.233, 169.235. A candidate who knowingly files an incomplete or inaccurate statement or report may be subject to a civil fine of up to \$1,000.00. MCL 169.233(10), 235(6). A candidate who knowingly omits or underreports a contribution or expenditure may be subject to a civil fine of up to \$1,000.00, or the amount of the undisclosed contribution or expenditure, whichever is greater. MCL 169.233(11).

Mr. Moss alleges that you failed to disclose certain expenditures made by your candidate committee.

Finally, the MCFA and corresponding administrative rules require a person who produces printed material that relates to an election to include the phrase "Paid for by [name and address of the person who paid for the item]." MCL 169.247(1), R 169.36(2). A knowing violation

constitutes a misdemeanor offense punishable by a fine of up to \$1,000.00, imprisonment for up to 93 days, or both. MCL 169.247(6).

Mr. Moss alleges that you failed to include the required disclaimer on some of your campaign material.

The purpose of this letter is to inform you of the Department's examination of these matters and your right to respond to the allegations before the Department proceeds further. It is important to understand that the Department is neither making this complaint nor accepting the allegations as true.

If you wish to file a written response to this complaint, you are required to do so within 15 business days of the date of this letter. Your response may include any written statement or additional documentary evidence you wish to submit. All materials must be sent to the Department of State, Bureau of Elections, Richard H. Austin Building, 1st Floor, 430 West Allegan Street, Lansing, Michigan 48918. If you fail to submit a response, the Department will render a decision based on the evidence furnished by the complainant.

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

To whom it may concern,

I am writing today as a concerned citizen. As the current election cycle begins to ramp up with primary elections only a few short months away, more and more money is being funneled into different campaigns. This money can be tracked in most cases due to Michigan's Campaign Finance laws. But the purpose of this letter is not to extol the virtues of campaign finance but rather to draw attention to a candidate who has continuously and blatantly disobeyed the law.

Ken Crider is running in the 19th Michigan House District comprising the city of Livonia. He has violated campaign finance laws on multiple occasions. The first and most egregious complaint is that Mr. Crider, did not create a candidate committee after announcing himself as a candidate in the mandated 10 day period nor did he submit his statement of organization in the allotted time. In fact it took 61 business days for him to file a candidate committee. Does he not read the laws or does he not care? The other violations are detailed in the attached evidence.

This list of violations shows either his flagrant disregard of campaign finance laws or his complete ineptitude. This confirms the type of candidate and leader that Mr. Crider is, bad. I see two simple ways these violations occurred: he either ignored, disregarded, or flouted the law or he genuinely missed one of the most important parts of a campaign, **disclosing your finances!** As he has already ran for congress one would assume he is familiar with the laws.

First he didn't file as a candidate, then he failed to put a disclaimer on his campaign materials, and then he failed to disclose his expenses. This chronic display of ham-fisted, and incompetent management of his campaign and its finances prove that Ken Crider is a poor candidate for State Representative, and a bad representation of the citizens of Livonia.

Concerned Citizen

Brad Moss

**Michigan Department of State
Campaign Finance Complaint Form**

Reset Form

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.*).

Please print or type all information.

I allege that the MCFA was violated as follows:

Section 1. Complainant		
Your Name Brad Moss	Daytime Telephone Number 248-345-9066	
Mailing Address 108 East Bay Dr.		
City Walled Lake	State MI	Zip 48390

Section 2. Alleged Violator		
Name Kenneth E. Crider		
Mailing Address 16381 Fairway St.		
City Livonia	State MI	Zip 48154

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

Section(s) of the MCFA violated: **MFCA Sec. 169.229, Sec. 29.1 (c) and 169.247 Sec. 47.1**

Explain how those sections were violated:

Please see the attached explanation of alleged violations.

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

Please see the attached exhibits.

BUREAU OF ELECTIONS
MI DEPT OF STATE

2014 MAY 13 AM 10:33

Section 4. Certification (Required)

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

X

Signature of Complainant

Date

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

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

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

X

Signature of Complainant

Date

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

Mail or deliver the completed complaint form 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

Section 3. Violations

Statement of Facts:

Complaint #1: Candidate violated MFCA Sec. 129.221 Sec. 21 (1) and Sec. 169.224 Sec. 24 (1) by failing to form a candidate committee within 10 days of becoming a candidate and failing to file a statement of organization within 10 days after forming a candidate committee.

MFCA Sec. 169.221 Sec. 21 (1) states:

“A candidate, within 10 days after becoming a candidate, shall form a candidate committee.”

MFCA Sec. 169.224 Sec. 24 (1) states:

“A committee shall file a statement of organization with the filing officials designated in section 36 to receive the committee’s campaign statements. A statement of organization shall be filed within 10 days after a committee is formed. A filing official shall maintain a statement of organization by a committee until 5 years after the official date of the committee’s dissolution. A person who fails to file a statement of organization required by this subsection shall pay a late filing fee of \$10.00 for each business day the statement remains not filed in violation of this subsection. The late filing fee shall not exceed \$300.00. A person who violates this subsection by failing to file for more than 30 days after a statement of organization is required to be filed is guilty of a misdemeanor punishable by a fine of not more than \$1,000.00.”

The candidate began promoting his candidacy by posting onto a Facebook page called, “Ken Crider for State Rep.” a picture of his campaign logo on May 5th, 2013. However, the candidate’s statement of organization was not filed with the Secretary of State until June 29th, 2013. It took 61 days for the candidate to file a statement of organization with the Secretary of State. **The candidate flagrantly disregarded the law by failing to file within 10 days after becoming a candidate and a statement or organization within 20 days after a committee is formed.**

Exhibits A, B and C provide evidence of the candidate's severe lack of transparency and abuse of the law.

Complaint #2: Candidate violated MFCA Sec. 169.203 Sec. 3 (c) by making an expenditure on behalf of candidacy without forming a candidate committee.

MFCA Sec. 169.229, Sec. 29.1 (c) states:

“‘Candidate’ means an individual who meets 1 or more of the following criteria:

(c) Receives a contribution, makes an expenditure, or gives consent for another person to receive a contribution or make an expenditure with a view to bringing about the individual's nomination or election to an elective office, whether or not the specific elective office for which the individual will seek nomination or election is known at the time the contribution is received or the expenditure is made.”

The attached picture of the candidate's Facebook profile picture provides evidence that the candidate began promoting the campaign logo well before the candidate filed for office and therefore is in violation of the Michigan Campaign Finance Act. The date of the posting of the picture is June 14, 2013. The candidate formed his candidate committee on July 29, 2013 according to his Statement of Organization (please see Exhibits A, B and C).

The candidate began spending money well before officially filing for office.

Complaint #3: Candidate violated MFCA Section 169.229, Sec. 29.1 (c) by not including an itemized list of all expenditures, including in-kind contributions for which the candidate contributed in-kind to three specific events. MFCA Sec. 169.229, Sec. 29.1 (c) specifically states:

“Candidate must include an itemized list of all expenditures, including in-kind contributions and expenditures during the period covered by the campaign statement that were contributions to a candidate committee of a candidate for elected office.”

Candidate failed to abide but the law by not listing the expenditure of a charcoal grill donated on behalf of his candidate committee on the 2013 Annual Statement.

Candidate contributed the use of his charcoal grill on three separate occasions:

- (a) On 7/20/13 the candidate contributed the use of his grill for the 11th Congressional District Republican Committee Picnic in Farmington Hills, MI.
- (b) On 7/24/13, the candidate contributed the use of his grill for the Wayne 11th Picnic in Canton, MI
- (c) On 9/15/13, the candidate contributed the use of his grill for the Wayne County Republican Committee picnic.

Please see the attached evidence found in Exhibits D-G posted to his candidate Facebook page in which he advertises the use of the grill on a yard sign reading, "Elect Ken Crider for Michigan State Representative. A Common Man with Common Sense. Grill Provided by Ken Crider for State Representative. 19th District."

Complaint #3: Candidate violated MFCA Sec. 169.247 Sec. 471 (1) by not including a disclaimer on candidate materials at the three aforementioned events.

MFCA Sec. 169.247 Sec. 471 (1) which reads:

"Except as otherwise provided in this subsection and subject to subsections (3) and (4), a billboard, placard, poster, pamphlet, or other printed matter having reference to an election, a candidate, or a ballot question, shall bear upon it the name and address of the person paying for the matter."

The attached pictures in Exhibits E-H **provide proof to the blatant abuse of candidacy and lack of transparency by candidate for failing to include a disclaimer which bears the name and address of the person paying for the yard sign.** The use of the words, "elect" and "for" expressly refer to an election and candidate. This is in clear violation of election law.

Complaint #4: Candidate violated MFCA Sec. 169.247 Sec. 471 (1) by not including a disclaimer on candidate materials at the following event:

The 11th Congressional District Committee's Pizza, Pistols and Politics event on 10/1/13. The candidate reported an in-kind contribution of pizza to the event without including in signage a disclaimer that reads, "Paid for by..."

Please see the attached picture in Exhibit H.

Complaint #5: Candidate violated MFCA Section 169.229, Sec. 29.1 (c) by not reporting the cost of expenditures for the creation of a campaign logo, business cards, campaign literature and/or other materials that promote the candidate. See Exhibits H showing a statement of all expenditures reported in the candidate's 2013 Annual Statement. There was no report of the cost of candidate's business cards, literature, signs or grill.

Please see Exhibits A and D-H.

Exhibit A

x

Ken Crider
June 14, 2013



Ken
Elect
CRIDER
FOR STATE
A Common Man
with Common Sense

Profile Pictures 6 of 11

Tag Photo Options Share Send

MI 19th District Serving all of Livonia Kenneth Crider 734-679-7757 Facebook @ Kenneth E. Crider

Join my Facebook Group @ Ken Crider for State Rep.

Not sure if you are registered? Go to www.michigan.gov/elections and check your registration status.

Vote in the Primary Election August 15, 2014
Vote in the General Election November 4, 2014
Mitchell



Ken Crider ▶ Ken Crider for State Rep.
May 5, 2013

Like Share

Sponsored

Create Ad

Sprint Family Builder
now.sprint.com/familyvapp

You need 6 friends for maximum
#Family savings. You have
hundreds to choose from.



Verizon Wireless

verizonwireless.com



The GalaxyS5 is here, 2 for 1 with
new 2yr activation per phone. Get it
2day.

ALL DRIVE. No Drama.™

Cars.com



2001 Audi A8 4.2 quattro, only
\$4,475!



MICHIGAN DEPARTMENT OF STATE
BUREAU OF ELECTIONS

ORIGINAL OR AMENDED

STATEMENT OF ORGANIZATION FORM FOR CANDIDATE COMMITTEES

① of ②

375335

1. Committee ID #: 516434

2. Type of Filing:
☒ Original
☐ Amendment to Item: _____ Eff. Date: _____

3. Full Name of Committee (must include Candidate's first and last name): Ken Crider for Livonia

4a. Candidate Full Name (Last, First, M.I.):
Crider, Kenneth E.

4b. Political Party (if applicable): Republican

4c. County of Residence: Wayne

4d. Office Sought (Check one):

<input type="checkbox"/> Governor	<input type="checkbox"/> Lt. Governor	<input type="checkbox"/> State Senator
<input checked="" type="checkbox"/> State Rep.	<input type="checkbox"/> Sec. of State	<input type="checkbox"/> Attorney Gen.
<input type="checkbox"/> State Bd. of Ed.	<input type="checkbox"/> UoM Reg.	<input type="checkbox"/> MSU Trustee
<input type="checkbox"/> WSU Gov.	<input type="checkbox"/> Supreme Court	<input type="checkbox"/> Appeals Court
<input type="checkbox"/> Circuit Court	<input type="checkbox"/> District Court	<input type="checkbox"/> Probate Court
<input type="checkbox"/> Municipal Court		

Local or other please specify: _____

4e. District/Circuit # or Jurisdiction: 19th

5. Date Committee was Formed: 07/20/13

6a. Committee Phone #: (734) 679-7757

6b. Committee Fax #: _____

6c. Committee E-mail Address: kcrider@gmail.com

6d. Committee Website Address: kennethcridermichigan.webs.com

7a. Complete Comm. Mailing Address (May be PO Box):
16381 Fairway St. Livonia, MI 48154

7b. Complete Comm. Street Address (May not be PO Box):
16381 Fairway St. Livonia, MI 48154

8. Treasurer Name and Complete Address:
Penny Crider 16381 Fairway St. Livonia, MI 48154

Phone #: (734) 679-7757

E-mail Address: plcrider@gmail.com

9. Designated Record Keeper Name and Complete Address:
Penny Crider 16381 Fairway St. Livonia, MI 48154

Phone #: (734) 679-7757

E-mail Address: plcrider@gmail.com

10. ☐ REPORTING WAIVER REQUEST: If the committee does not expect to receive or expend in excess of \$1,000 in an election and checks this box, the filing requirement of pre, post and annual campaign statements is waived. The Reporting Waiver will be automatically lost if the committee exceeds the \$1,000 threshold.

11. Name and Address of Depositories or Intended Depositories of committee funds. (Michigan Bank, Credit Union or Savings & Loan Association)

a. Official Depository
JPMorgan Chase Bank, N.A. Detroit, MI 48226

b. Secondary Depository

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.

The Campaign Finance Act requires any committee that files with the Secretary of State and spends or receives \$20,000 in the preceding calendar year OR expects to spend or receive \$20,000 in the current calendar year to file campaign statements electronically. MERTS Plus software is provided to you free of charge to assist you in meeting this requirement.

☐ Committee spent or received or expects to spend or receive in excess of \$20,000 and is required to file electronically.

**** OR ****

☐ Committee did not spend or receive or does not expect to spend or receive in excess of \$20,000 and would like to file electronically voluntarily.

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)

[Signature] 07/22/13
Candidate

[Signature] 07/22/13
Current Treasurer

[Signature] 07/22/13
Designated Record Keeper (Required only if filing electronically)

BUREAU OF ELECTIONS
MICHIGAN DEPT OF STATE
2013 JUL 29 PM 10:47

Ken Crider for State Rep.

January 2, 2024

Happy New Year, enjoy these WARM memories from last year (18 photos)
pictures from the 11CDRC picnic, Wayne 11th picnic and Wayne county republican committee picnic. I would love the opportunity to serve at these and more events this year

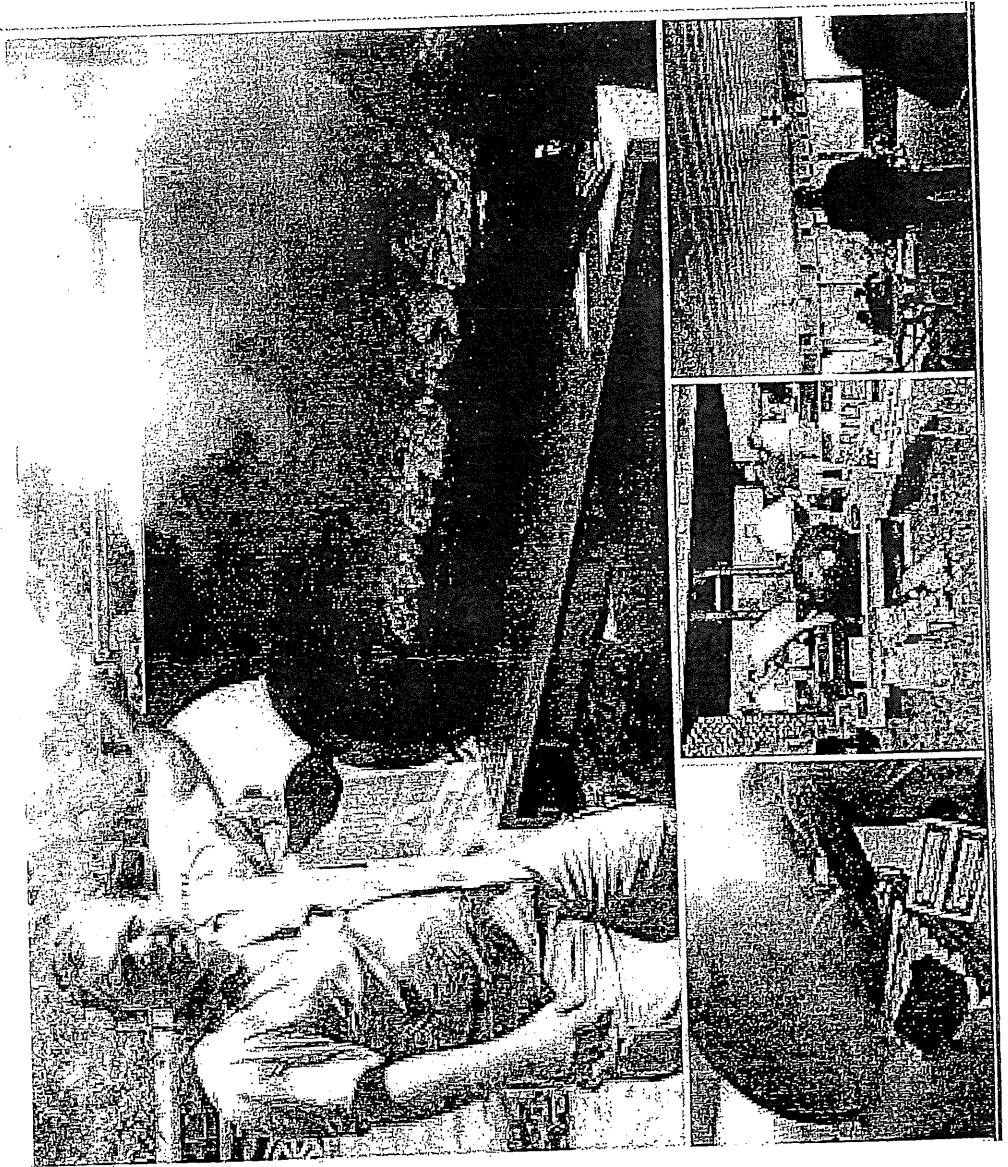
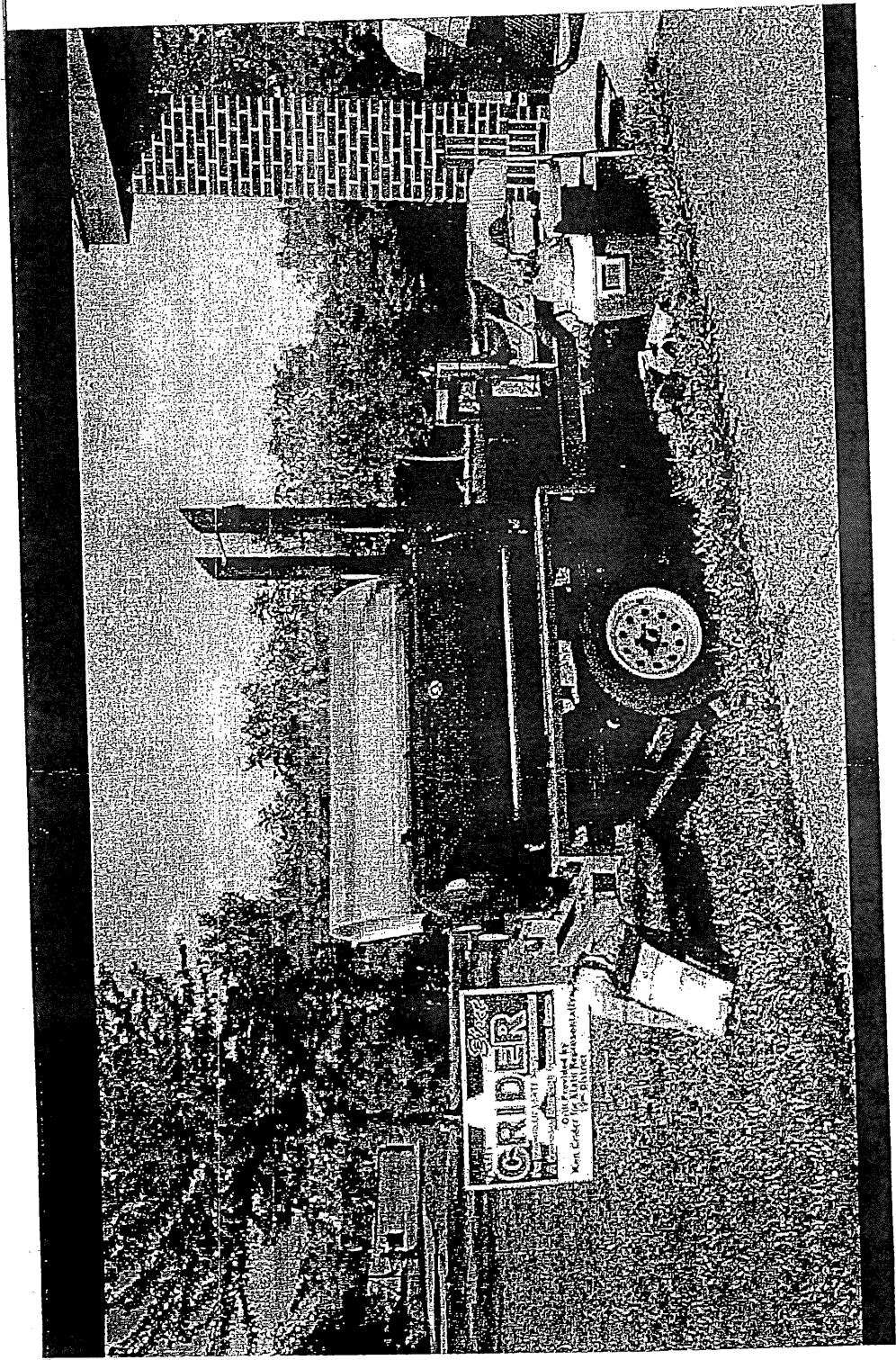


Exhibit E

Ken Crider for State Rep.
Liked · January 2 ·



Like · Comment · Share



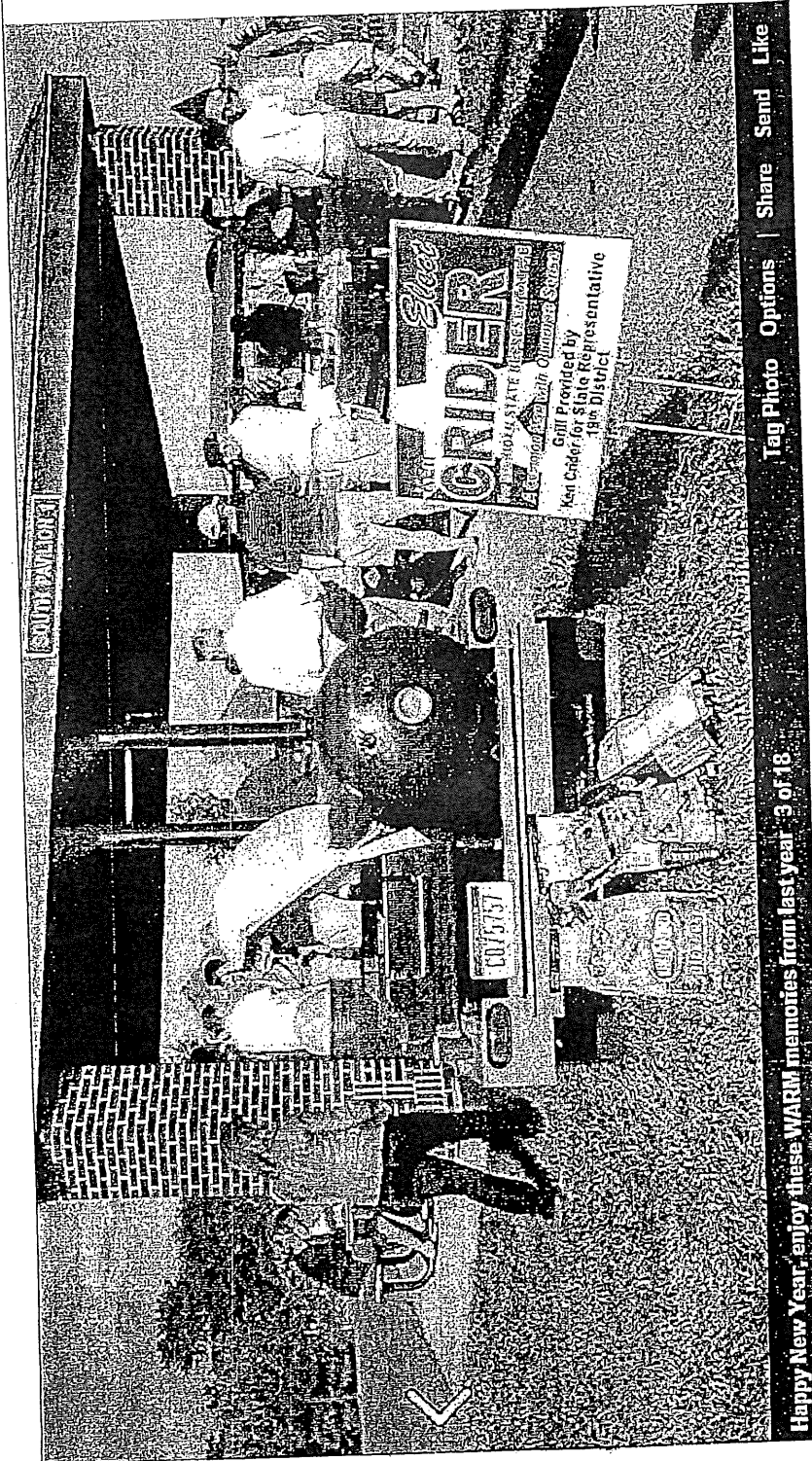
Ken Crider for State Rep.
Liked · January 2 · #



With Paul Cusick, Audrey Robinson, Jordyn Salmon
and Mark Hutchins.

Like · Comment · Share

👍 2 people like this.



Happy New Year, enjoy these WARM memories from last year 3 of 18

Tag Photo Options | Share | Send | Like

Exhibit G

Ken Crider for State Rep.
Liked · January 2 · 67



With Paul Cusick, Audrey Robinson, Jordyn Salmon and Mark Hutchins.

Like · Comment · Share
👍 2 people like this.



Happy New Year, enjoy these WARM memories from last year 3 of 18

Tag Photo Options Share Send Like

Exhibit H

Michigan's 11th Congressional District
Republican Committee
Liked · October 3, 2013

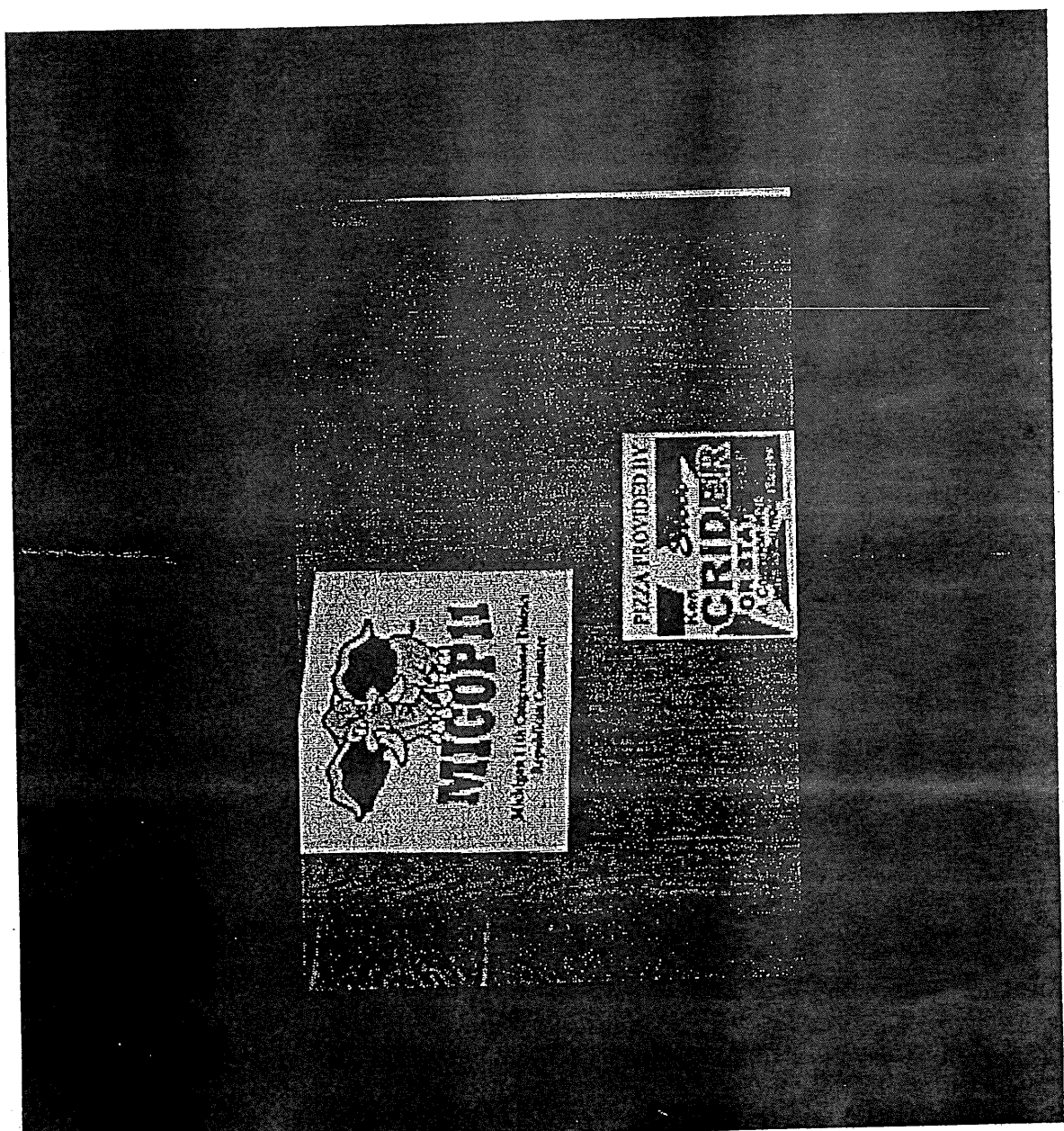


Like · Comment · Share

Write a comment...



Spo G o



MICHIGAN CAMPAIGN STATEMENT EXPENDITURE SEARCH

☐ Committee Name: FRIENDS OF KEN CRIDER
☐ Statement Type: ANNUAL CS
☐ Statement Year: 2014
☐ Schedule: ITEMIZED DIRECT EXPENDITURES

There are no Expenditures of this type attached to this Campaign Statement.

[Campaign Finance On-Line]

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Exhibit I