



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

July 8, 2016

Regina Ross  
8430 Beaverland  
Detroit, Michigan 48239

Dear Ms. Ross:

The Department of State (Department) received a formal complaint filed by Sylvia Santana against you, alleging that you violated section 47(1) of the Michigan Campaign Finance Act (MCFA), 1976 PA 388, MCL 169.247(1), by failing to include a complete and correct identification statement on certain campaign materials. A copy of the complaint is provided as an enclosure with this letter.

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), Mich. Admin. 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).

In support of her complaint, Ms. Santana provided a flyer which states, "Regina Ross for State Representative District #9 [.]". There does not appear to be a paid-for-by statement on the flyer.

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 the complaint, you are required to do so within 15 business days of the date of this letter. Please include any evidence that reflects any corrective measures you have taken to bring your campaign material into compliance with the MCFA.** 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.

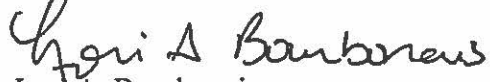
A copy of your reply will be provided to Ms. Santana, who will have an opportunity to submit a rebuttal statement to the Department. After reviewing all of the statements and materials provided by the parties, the Department will determine whether "there may be reason to believe that a violation of [the MCFA] has occurred [.]". MCL 169.215(10). Note that the Department's enforcement powers include the possibility of entering a conciliation agreement, conducting an

Regina Ross  
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administrative hearing, or referring this matter to the Attorney General for enforcement of the criminal penalty 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,

A handwritten signature in black ink, appearing to read "Lori A. Bourbonais". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Lori A. Bourbonais  
Bureau of Elections  
Michigan Department of State

c: Sylvia Santana

**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	SYLVIA SANTANA	Daytime Telephone Number
Mailing Address		734 657 4710
5700 BRACE ST.		
City	State	Zip
DETROIT	MI	<del>48228</del> 48228

Section 2. Alleged Violator		
Name	REGINA ROSS	
Mailing Address	8430 BEAVERLAND	
City	State	Zip
DETROIT	MI	48239

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

Section(s) of the MCFA violated:

169.247

Explain how those sections were violated:

MS. ROSS IS DISTRIBUTING CAMPAIGN LITERATURE  
WITHOUT A NAME AND ADDRESS OF THE PERSON  
PAYING FOR THE MATTER.

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

SEE ATTACHED

RECEIVED/FILED  
MICHIGAN DEPT OF STATE  
2016 JUL -1 PM 12:27  
ELECTIONS/GREAT SEAL

**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

Sybil A. Sartore  
Signature of Complainant

6/24/2016  
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:*

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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

## ➤ I Stand For

Fairness and Equity for Citizens

Funding for Public Education

Basic Services including  
purification of water

Enforcing removal of public  
hazards

Providing human services, health  
and safety

Securing grants for neighborhoods,  
small businesses and Senior  
citizens.

District  
#9

## ➤ My Issues

Education Reform

Save Detroit Public Schools

State Government accountability  
Water issues/street pipe bursting

Home and Auto Insurance  
(Stop redlining)

"I will represent the citizens  
and community with integrity,  
honesty, and transparency"

## ➤ My Affiliations

American Federation of  
Teachers

Detroit Federation of  
Teachers 231

DFT Union Representative

Community/Political Team  
member

Union Delegate

Democratic Party  
13th Congressional

Executive Board Member

Precinct Delegate

Concept East Institute  
on Facebook

Keri's Korner Community  
Group; Director

Unity Baptist Church

Detroiters for Good  
Government

Women of Wayne

NAACP Detroit Chapter

Arise Detroit

## ➤ Community Outreach

Provide Free GED, Adult  
Educational Services

Food and Gardening

Employment

Clothes and Toiletries

School Supplies



## ➤ Education

Wayne State University:  
Bachelor of Art

Master of Education  
Administration/Instructional Tech

Wayne State University  
Master of Education/Management

Ashford University  
Education Administration  
Specialist E.D.

Regina  
**Ross**  
for State  
Representative

District  
#9

For Information  
Contact:



Regina Ross  
for  
State  
Representative



Join my election team.

Please contact me:

Name

Email

Phone



regina.ross333@gmail.com



(313)310-9364

District  
#9





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

October 17, 2016

Regina Ross  
8430 Beaverland  
Detroit, Michigan 48239

Dear Ms. Ross:

The Department of State (Department) has completed its investigation of the complaint filed against you by Sylvia Santana, which alleged that you violated section 47(1) of the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.247(1), by failing to include a complete and correct identification statement on certain campaign material. This letter concerns the disposition of Ms. Santana's complaint.

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).

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 [.]" MCL 169.215(10). The objective of an informal resolution is "to correct the violation or prevent a further violation [.]" Id.

Ms. Santana filed her complaint on July 1, 2016. The Department gave notice of the complaint to you by letter dated July 8, 2015. That notice letter informed you that you had 15 business days to respond to the complaint. As of today, you have failed to provide any response to the Department.

Because you have failed to submit a response, the Department has no choice but to render a decision based on the evidence furnished by the complainant.

Ms. Santana alleged that you failed to include a paid-for-by identification statement on your campaign flyer. In support of her complaint, Ms. Santana provided a campaign flyer which stated, "Regina Ross for State Representative [.]". It appears that a paid-for-by identification statement is missing from the flyer.

While the Department believes that the evidence tends to show that your campaign signs failed to contain a paid-for-by statement, section 15(10) of the MCFA requires the Department to "endeavor to correct the violation or prevent a further violation by using informal methods such as a conference, conciliation, or persuasion [.]"

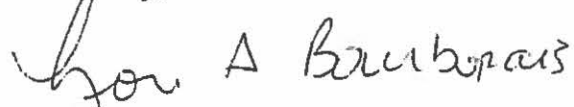
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The Department is advising you that section 47(1) and R 169.36(2) require you to print a complete and accurate identification statement on all campaign materials, consisting of the phrase "paid for by" followed by the full name and address of your committee. Note that all printed materials that refer to an election or your candidacy produced in the future must include this identification statement.

Please be advised that this notice has served to remind you of your obligation under the Act to identify your printed matter, and may be used in future proceedings as evidence that tends to establish a knowing violation of the Act. A knowing violation is a misdemeanor offense and may merit referral to the Attorney General for enforcement action. MCL 169.247(6), 215(10).

The Department now considers this matter closed and will take no further action against you at this time.

Sincerely,

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

Lori A. Bourbonais  
Bureau of Elections  
Michigan Department of State

c: Sylvia Santana