



Michigan Department of State
Campaign Finance Complaint Form

BUREAU OF ELECTIONS • RICHARD H. AUSTIN BUILDING - 1st Floor
430 W. ALLEGAN STREET • LANSING, MICHIGAN 48918

2020 OCT 21 AM 11:18

This complaint form may be used to file a complaint alleging that someone violated the Michigan Campaign Finance Act (MCFA). For instructions on how to complete this form, see the Campaign Finance Complaint Guidebook & Procedures document. All spaces are required unless otherwise indicated.

Section 1. Complainant		
Your Name Aaron Martinez		Daytime Telephone Number (248) 672-8807
Mailing Address 31168 Shorecrest Drive, #28308		
City Novi	State MI	Zip 48377
Email (optional)		

Section 2. Alleged Violator		
Name Chase Turner		
Mailing Address 21320 Woodland Glen Drive, #101		
City Northville	State MI	Zip 48167
Email (optional)		

Section 3. Allegations (Use additional sheets if more space is needed.)

Section(s) of the MCFA alleged to be violated: MCL 169.247

Explain how those sections were violated:

In 2018, the Chase Turner Committee was given a warning to make sure all campaign materials contained the disclosures required by the MCFA. Mr. Turner's campaign continues to defy campaign finance laws by not having the proper disclosures listed on his signs and vehicle billboards.

Because Mr. Turner is a repeated violator of the Michigan Campaign Finance Act, it should be inferred by the Bureau that he is deliberately disregarding the MCFA, and the prior warnings he has received.

Evidence included with the submission of the complaint that supports the allegations:

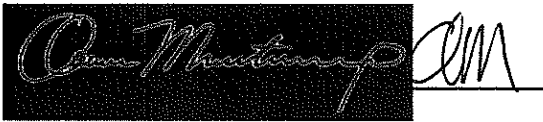
Photos showing Mr. Turner's signs without the proper Section 47 disclosure are enclosed.

Staudt v. Turner, No 2018-05-014-47 (Prior Substantiated Campaign Finance Violation)

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



October 15, 2020

Date

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

If, after a reasonable inquiry under the circumstances, you are unable to certify that certain factual contentions are supported by evidence as indicated above, you may 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:

At least one of Mr. Turner's volunteers was witnessed on/about October 13, 2020 driving a vehicle which had Mr. Turner's name, logo, and image on a vinyl window cover. The window cover effectively operates as a moving billboard for his campaign. No Section 47 disclosure was visible on the vinyl. Pictures were unable to be taken at the time, however, Mr. Turner's campaign finance filings show that his campaign has expended money on such window vinyls.

X



October 15, 2020

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.

Section 6. Submission

Once completed, mail or hand deliver the complaint form with your evidence to the address below. The complaint is considered filed upon receipt by the Bureau of Elections.

Michigan Department of State
Bureau of Elections
Richard H. Austin Building – 1st Floor
430 West Allegan Street
Lansing, Michigan 48918

Chase for state house
Turner

Vote Change • Vote Chase

COMMITTED TO THE SAFETY OF YOUR FAMILY, FINANCES, AND FUTURE



Chase Turner for State Rep HD38's...



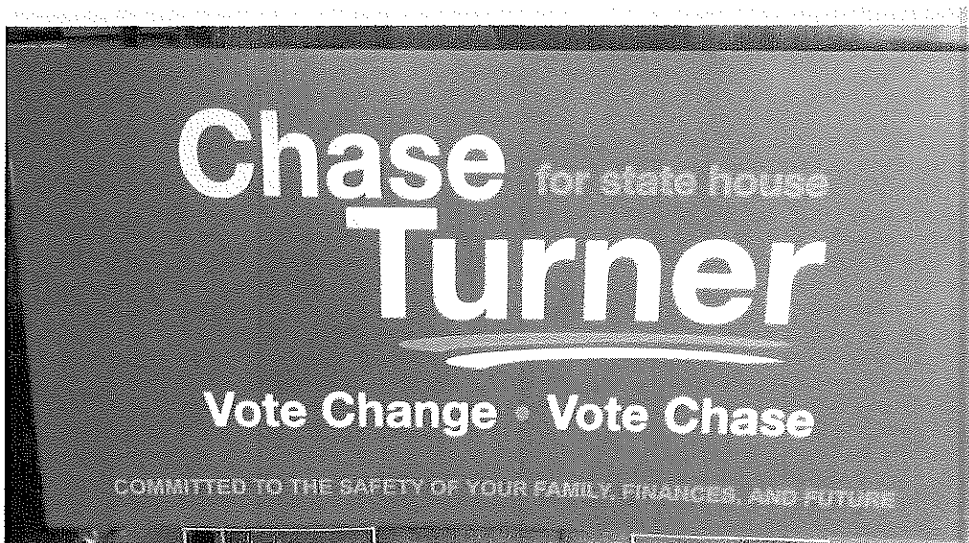
Like



Comment



Share



Like



Comment



Share



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

June 5, 2018

Chase Turner
21320 Woodland Glen Drive
Apartment 101
Northville, MI 48167

Re: *Staudt v. Turner*
Campaign Finance Complaint
No. 2018-05-014-47

Dear Mr. Turner:

The Department of State (Department) has received a complaint alleging that you have violated MCL 169.247 of the Michigan Campaign Finance Act (MCFA) by failing to include a complete and correct identification statement on certain campaign-related materials.

The MCFA and corresponding administrative rules require a person who produces printed material that relates to an election 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.*

There are two pieces of campaign materials that have been provided which appear to violate MCL 169.247. The first is literature that was distributed to voters, and the second is your campaign website. In support of the complaint, copies of the materials were provided, and have been enclosed with this communication.

Upon review, it appears that the paid for by statement is omitted entirely from the mailing and your website does not contain a proper committee address following the paid for by statement both in violation of MCL 169.247. Given this, the Department is hereby advising you that MCL 169.247(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

Chase Turner
June 5, 2018
Page 2

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. If this information has been included on your website or campaign flyers, please provide this office evidence demonstrating the proper paid for by statements.

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 considers the instant action closed and resolved.

Sincerely,

A handwritten signature in dark ink, appearing to read "Adam L.S. Fracassi", written over the typed name.

Adam L.S. Fracassi
Bureau of Elections
Michigan Department of State

c: David Staudt

Campaign Finance Complaint Form
Michigan Department of State

2018 MAY 25 AM 7:57

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 <i>David Staudt</i>		Daytime Telephone Number <i>248-561-5055</i>
Mailing Address <i>43155 Main Street Ste 2210E</i>		
City <i>Novi</i>	State <i>MI</i>	Zip <i>48375</i>

Section 2. Alleged Violator		
Name <i>Chase Turner</i>		
Mailing Address <i>21320 Woodland Glen Dr. Apt. 101</i>		
City <i>Northville</i>	State <i>MI</i>	Zip <i>48167</i>

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

Section(s) of the MCFA violated:

47(1) MCFA 1976 PA 388 MCL 169.247(1)

Explain how those sections were violated:

- ① Campaign Lit does not include a complete and correct identification statement.
- ② Website does not include a complete and correct identification statement.

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

- ① Actual lit distributed to voter
- ② Copy of website - chaseturner.org that includes improper "paid for" statement.

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

5/16/18
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 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

RECEIVED/FILED
MICHIGAN DEPT OF STATE
2018 JUN 20 PM 1:38
ELECTIONS/GREAT SEAL

Chase Turner
21320 Woodland Glen Drive
Northville, MI 48167

Adam L.S. Fracassi
Bureau of Elections
430 W Allegan, 1st Floor
Lansing, MI 48918

June 18, 2018

Dear Mr. Fracassi;

This responds to your letter of June 5, 2018 regarding compliance with MCL 169.247. As a first time candidate, compliance is an important issue as any claim by an incumbent is magnified. We appreciate your assistance.

Paragraph five of your letter requested "evidence demonstrating" compliance with the requirement to have the "paid for" language added to printed campaign material and evidence that our website has this "paid for" language, too. To that end, attached is a current campaign mailer with the "paid for" language. Also attached is a screenshot of my campaign website (<https://www.chaseturner.org/>) which illustrates compliance with the "paid for" language.

We are happy to provide the requested material, but we also add more details for your background.

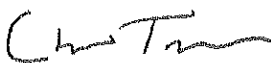
The printed campaign material provided was the first item we printed. These were not mailers, rather cards handed out by me.

We printed a very small quantity and on delivery noted that the "paid for" language did not get picked up at the printer. In response to this printing error, volunteers hand applied a label with the "paid for" language onto each printed item. Subsequent print runs corrected this printing error.

So, the person who filed the complaint or another person apparently *removed* the label applied with the "paid for" language. It is unfortunate that in a contested election such as this, activists for the opposing candidate or someone else felt compelled to remove a label which then enables a claim non-compliance. A printed label was on the item. That label was removed by someone. That is discouraging behavior by someone.

We appreciate that your letter concludes with the statement that you consider this matter closed and resolved. We do, too. If you have further questions, please call me at 248-794-0795.

Sincerely,



Chase Turner

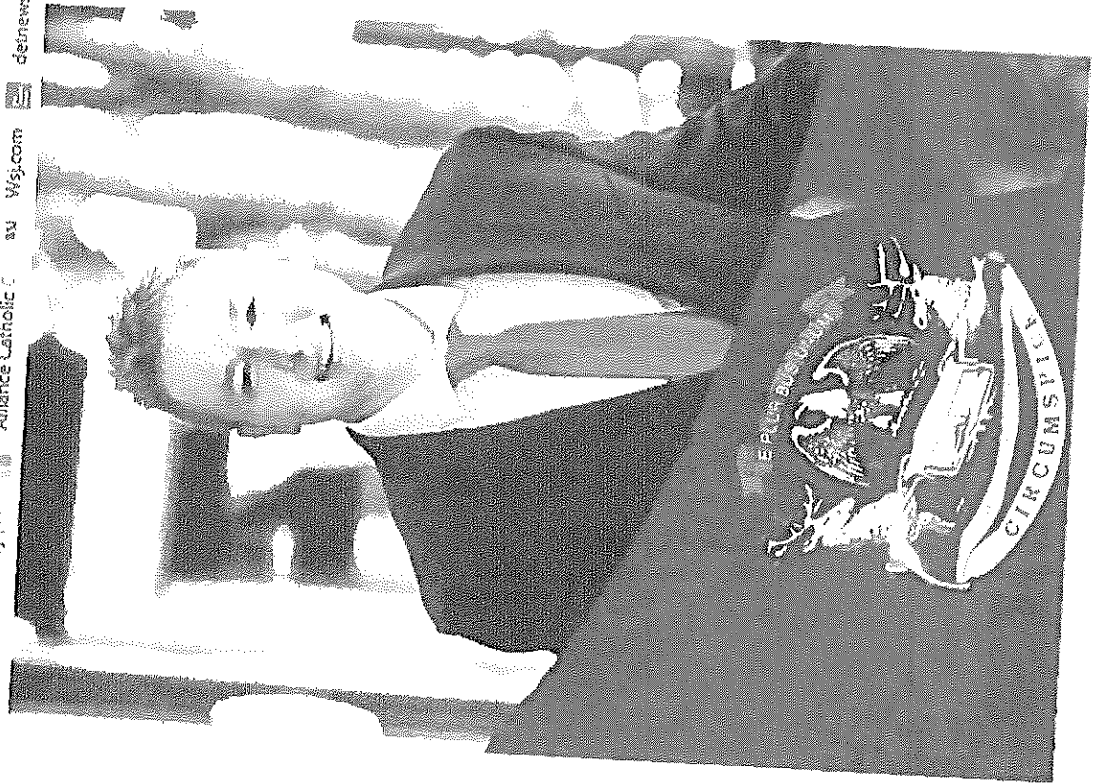
Candidate for Michigan 38th House

Attachments:

Mailer sample

Website screenshot

Paid for by the Vote Chase Turner Committee, 21320 Woodland Glen Drive, Northville, MI
48167



WHERE I STAND

- Pro-Life
- Pro-Second Amendment
- Smaller Government & Better Roads
- Less Taxes

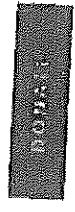
[Learn More](#)

WHO I AM

- Grandson of Marilyn Turner
- Oakland County Native
- College Athlete
- University of Michigan - Dearborn

[Learn More](#)

HOW TO SUPPORT US



Paid for by the Vote Chase Turner Committee

21320 Woodland Glen Dr #101, Northville MI 48167



Chase Turner

Pro Life Pro 2nd Amendment
Pro Smaller Government

- My OPPONENT voted against a promised income tax decrease
- My OPPONENT voted for a HUGE tax increase to "fix the roads"
- My OPPONENT voted for a tax on your HOME to support businesses




"Chase: I appreciate your fire getting into this. You've got my full support in your race."


- State Senator Pat Colbeck

Vote Change Vote Chase

Paid for by the Vote Chase Turner Committee | 21320 Woodland Glen Dr. #101, Northville, MI 48167



Chase Turner



"John and I have always been proud of our grandson Chase. It's so good to see his strong values being put to use to serve the community"
Marilyn Turner

- ✓ Auto Insurance Reform
- ✓ Long Term Solutions for Roads
- ✓ Education Reform
- ✓ Advocate for Part Time Legislature

*A Representative for the People
not the Lansing Lobbyists*

Vote Change Vote Chase

VOTE CHANGE - VOTE CHASE

38TH DISTRICT REPUBLICAN

AUGUST 7TH, 2018



WHERE I STAND

- Pro Life
- Pro Second Amendment
- Smaller Government & Better Roads
- Low Taxes

[Learn More —](#)

WHO I AM

- Graduate of Marilyn Turner
- Oakland County Native
- College Athlete
- University of Michigan - Dearborn

[Learn More —](#)

HOW TO SUPPORT US

[DONATE](#)

[Join the VOTE CHANGE - VOTE CHASE Campaign](#)

A TRUE CONSERVATIVE REPUBLICAN



Chase Turner

Strong to Serve

Michigan's 38th House District

chaseturner.org

- ✓ Long-term solutions for roads
- ✓ Common sense no-fault insurance reform
- ✓ Advocate for a part-time legislature
- ✓ Education reform
- ✓ Lower energy costs

Vote **CHANGE** Vote **CHASE**
August 7, 2018



STATE OF MICHIGAN
JOCELYN BENSON, SECRETARY OF STATE
DEPARTMENT OF STATE
LANSING

October 27, 2020

Chase Turner
21320 Woodland Glen Drive, #101
Northville, MI 48167

Re: *Martinez v. Turner*
Campaign Finance Complaint
No. 2020-10-180-47

Dear Mr. Turner:

The Department of State (Department) has received a formal complaint alleging you have violated MCL 169.247 of the Michigan Campaign Finance Act (MCFA) by failing to include a complete and correct identification statement on certain campaign-related materials. A copy of the complaint is enclosed.

The complaint was submitted to the Department on October 21, 2020 and alleges that you have distributed campaign materials that did not include a proper paid for by statement. A picture of the campaign material is included with the complaint.

The MCFA and corresponding administrative rules require a person who produces printed material that relates to an election 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 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. 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.* An explanation of the investigation process is enclosed with this letter and a copy is available on the Department's website.

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.

Given that the Department previously found a violation against you in 2018 for failing to list a proper paid for by statement on your campaign materials, should you choose to file a response to the instant complaint, **please address why the Department should not treat this as a knowing violation given your 2018 warning.**¹

A copy of your answer will be provided to Mr. Breen, 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 penalty provided in section 47 of the Act.

If you have any questions concerning this matter, you may contact me at (517) 335-3234.

Sincerely,

A handwritten signature in black ink, appearing to read 'Adam Fracassi', with a stylized, cursive script.

Adam Fracassi
Bureau of Elections
Michigan Department of State

Enclosure
c: Aaron Martinez

¹ *Staudt v. Turner*, available at:
https://www.michigan.gov/documents/sos/Staudt_v_turner.web_627874_7.pdf

Chase Turner for
State Rep HD38
@ChaseTurnerGOP

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Share

Send Message

...

will deliver one to your house! You can also email us at
votechaseturner@outlook.com.

27

Like

Comment

Share

2 Comments

Public Figure

Page Transparency

See More
Facebook is showing information to help you better understand the purpose of a Page. See actions taken by the people who manage and post content.

WENDI LYNN DUNAJ-RING is responsible for this Page.

People

572 likes

Related Pages

State Representative Ryan B...

Michigan Conservative Union

North Oakland Republican Club

Livingston County Republican P...

Paul Stephens - MiGOP Youth C...

See more of Chase Turner for State Rep HD38 on Facebook

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or

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Chase Turner for
State Rep HD38
@ChaseTurnerGOP

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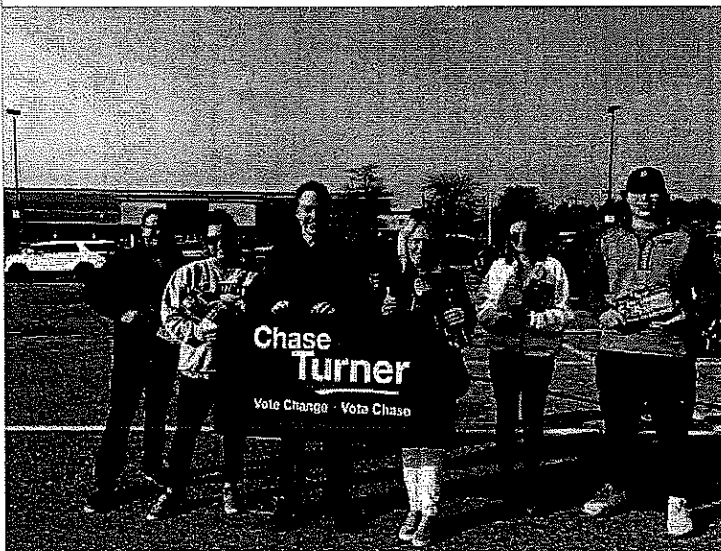
Create a Page



Chase Turner for State Rep HD38

October 10 at 4:54 PM ·

Another great day on the doors today! Thank you to MRP Chairwoman Laura Cox for coming out to help keep the 38th Red!



41

4 Shares

Like

Comment

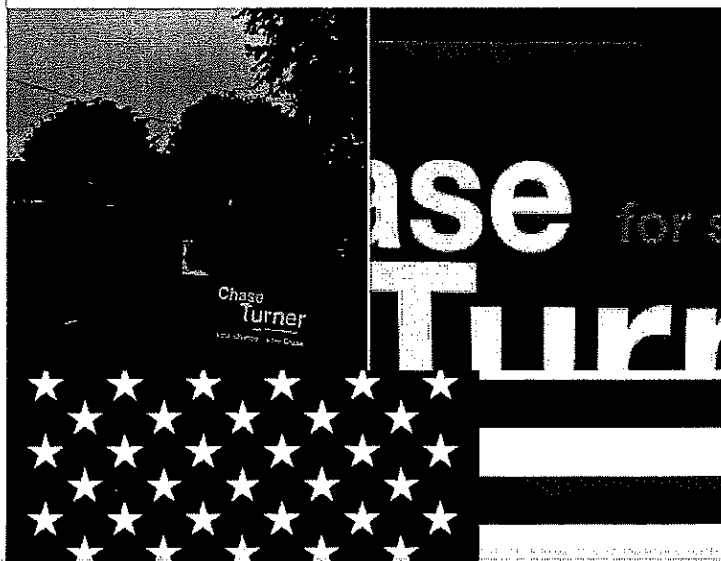
Share



Chase Turner for State Rep HD38

October 9 at 6:13 PM ·

If you'd like a Chase Turner for MI House sign, message or call us and we will deliver one to your house! You can also email us at votechaseturner@outlook.com.



Community

See All



572 people like this



601 people follow this

About

See All



ChaseTurner.org



Public Figure

Page Transparency

See More

Facebook is showing information to help you better understand the purpose of a Page. See actions taken by the people who manage and post content.

WENDI LYNN DUNAJ-RING is responsible for this Page.

People

572 likes

Related Pages



State Representative Ryan B...
Government Official



Michigan Conservative Union
Nonprofit Organization



North Oakland Republican Club
Education



Livingston County Republican P...
Political Party

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State Rep HD38
@ChaseTurnerGOP

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Chase Turner for State Rep HD38

October 13 at 4:59 PM ·

Thank you, Coach Sackett for the kind words. Coach Sackett has been a mentor of mine since I was young, and he is still a great friend to this day. Judge me by those that know me most.



1:05

16

5 Shares

Like

Comment

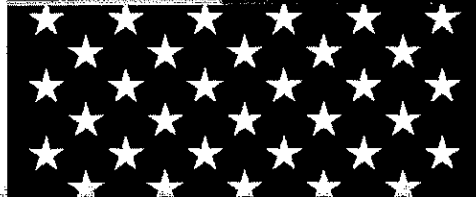
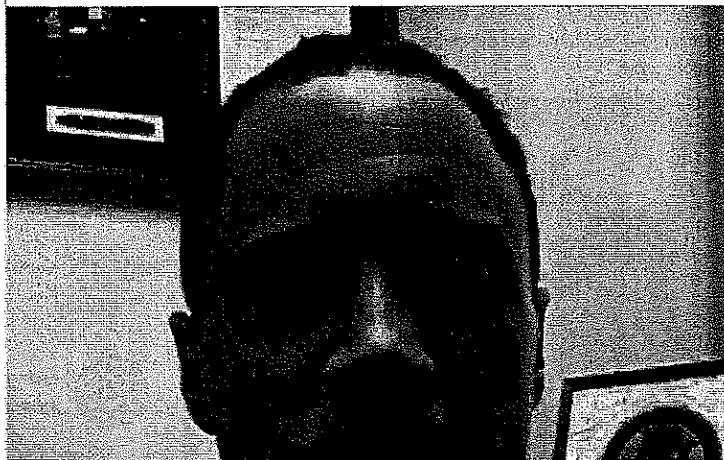
Share



Chase Turner for State Rep HD38

October 12 at 2:32 PM ·

Blessed to have our campaign endorsed by my good friend Tom Leonard. He worked hard for us first as a House member and then as Speaker of the Michigan House. Next Tuesday (October 20) join Tom and I at a reception to help finance our campaign!

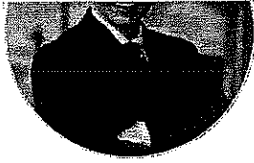


See more of Chase Turner for State Rep HD38 on Facebook

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Chase Turner for
State Rep HD38
@ChaseTurnerGOP

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9

1 Share

Like

Comment

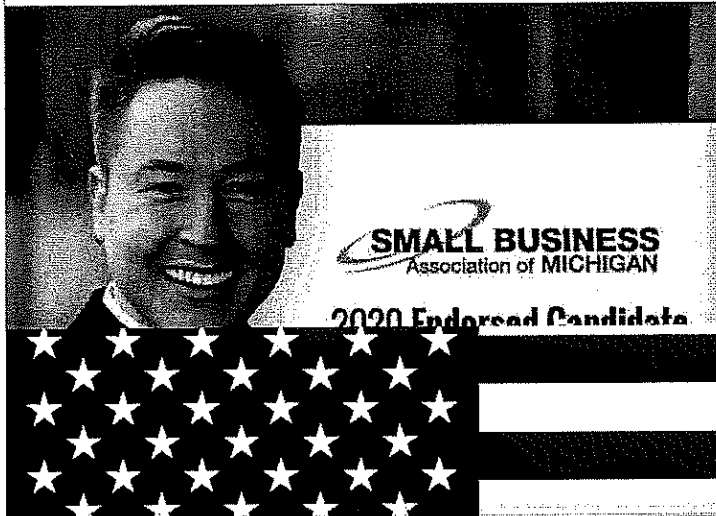
Share



Chase Turner for State Rep HD38

October 14 at 12:57 PM ·

We are blessed to be endorsed by the Small Business Association of Michigan (SBAM). Small businesses are a core foundation of our communities, including the 38th District. When elected to serve in Lansing, we will work to help small businesses regain their footing after the recent lockdown.



See more of Chase Turner for State Rep HD38 on Facebook

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Chase Turner for
State Rep HD38
@ChaseTurnerGOP

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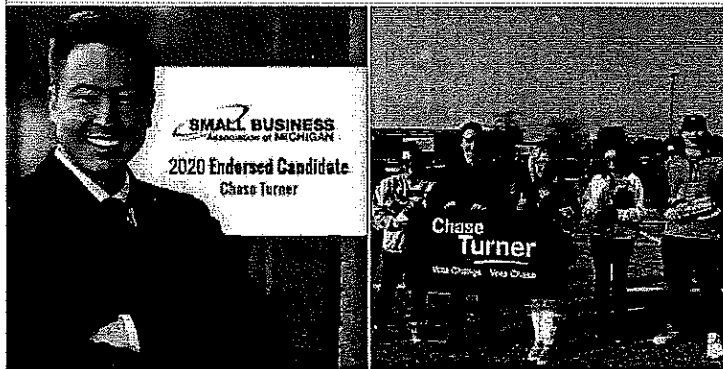
Posts

Photos

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Create a Page

Photos



See All

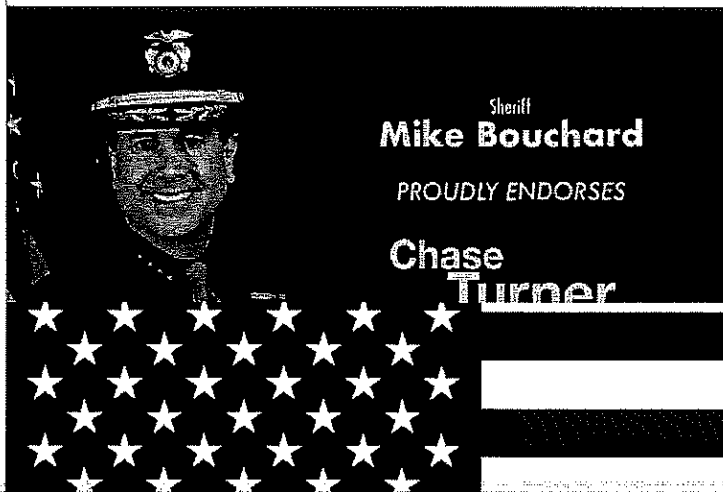
Posts



Chase Turner for State Rep HD38

October 20 at 4:02 PM ·

We are blessed to be endorsed by Oakland County Sheriff, Mike Bouchard. Supporting our police and all first responders who keep Michigan citizens safe, is one of our top priorities!



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State Rep HD38

@ChaseTurnerGOP

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Visit the Voting Information Center for official election resources and local updates.

Get Voting Information

56

1 Comment 7 Shares

Like

Comment

Share



Chase Turner for State Rep HD38

20 hrs ·

My opponent aggressively stated that, "you better damn believe I support government run healthcare." That policy would require YOU to subsidize health insurance premiums for others. Experts agree government healthcare will lead to fewer coverage options, fewer hospitals, and higher taxes. My opponent is a true believer in big government solutions. She believes that the Governor's 45 cent per gallon tax increase would be "reasonable". The 38th district does not need big government answers to our problems. We need common sense solutions.

<https://michiganrisingaction.org/.../state-house-candidate-k.../>



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State Rep HD38
[@ChaseTurnerGOP](#)

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All Americans have the right ...

Many politicians want to pro...

4

8

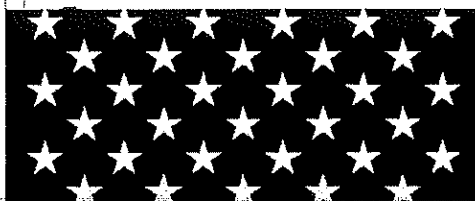
10

12

2

[See All](#)

Posts



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Chase Turner
21320 Woodland Glen Drive
Northville, MI 48167

November 10, 2020

Adam Fracassi
Bureau of Elections
430 W. Allegan
Lansing, MI 48918

Dear Mr. Fracassi

This responds to your letter of October 27, 2020 (received by me on November 9, 2020) regarding compliance with MCL 169.247. We appreciate your assistance.

Paragraph five of your letter requests "documentary evidence" regarding compliance.

Since the allegation on the Complaint Form in Section 5 (Certification without Evidence) *presents no evidence at all* in support of the claim, let's start there. Indeed my campaign used vehicle wrap material to advertise. Each wrap was prepared and installed by the same third party vendor. That vendor's production proof of the wrap is attached (Exhibit A). Their production proof clearly shows that the "paid for by" language was what was produced and installed by that vendor.

The last paragraph of Section 5 cites Section 15(8) that applies where a false certification is made and such person is then subject to a civil fine of up to \$1,000. We request that you seek that penalty from the Complainant. The Complainant, in our opinion, knowingly filed a complaint with no "evidence" though he seems to have had plenty of camera work done on the other issue. No evidence was submitted as none was available. It is a false claim.

The Bureau of Elections should not encourage such frivolous complaints. Complainants making allegations without evidence should be censured, just as a noncompliant candidate should be. Such baseless claims consume your and the candidate's time---for no reason.

Section 3 (Allegations) states that our yard signs are "without the proper Section 47 disclosure". Again, this is incorrect. The Complainant conveniently photographed one

side of a sign. If the Complainant had photographed the other side of the sign the "paid for by" is in plain sight (Exhibit B). For your convenience, attached are correct and complete photographs (Exhibit C). Also attached is a statement from the third party sign producer stating that the "paid for by" language was on all signs produced (Exhibit D).

Here, again, the Complainant is acting only as a partisan attempting to slander a campaign that worked diligently to comply with the numerous MCFA requirements.

About the Complainant. ***Throughout the campaign***, he repeatedly made personal, vulgar, vile and disgusting posts on social media. He also sent vulgar, vile and disgusting emails. A cursory check of social media will demonstrate he aligns with the party of my opponent (e.g., photos with various public figures of that party). For whatever reason, the Complainant has decided to pursue frivolous claims as a way to permanently "punish" me for daring to be a candidate.

As you are well aware, however frivolous the claim, it remains a permanent record. That is unfortunate. Candidates deserve better.

Finally about 2018. In our correspondence at that time, we made clear that the "paid for by" language was manually applied to a handful of literature pieces. That adhesive attachment had been removed by someone and then the item became the centerpiece for a complaint. You have all this information on file in my letter of June 18, 2018.

For practical purposes, there was no intent, nor any violation in 2018. In reality there is no violation in 2020. In 2020, what there is is a partisan trying to make a point with no evidence of any kind.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chase Turner', with a stylized, flowing script.

Chase Turner

Attachments

810-588-4703
810-588-4706
8200 Grand River Road
Brighton, MI 48114

28' 25" Actual Glass Height

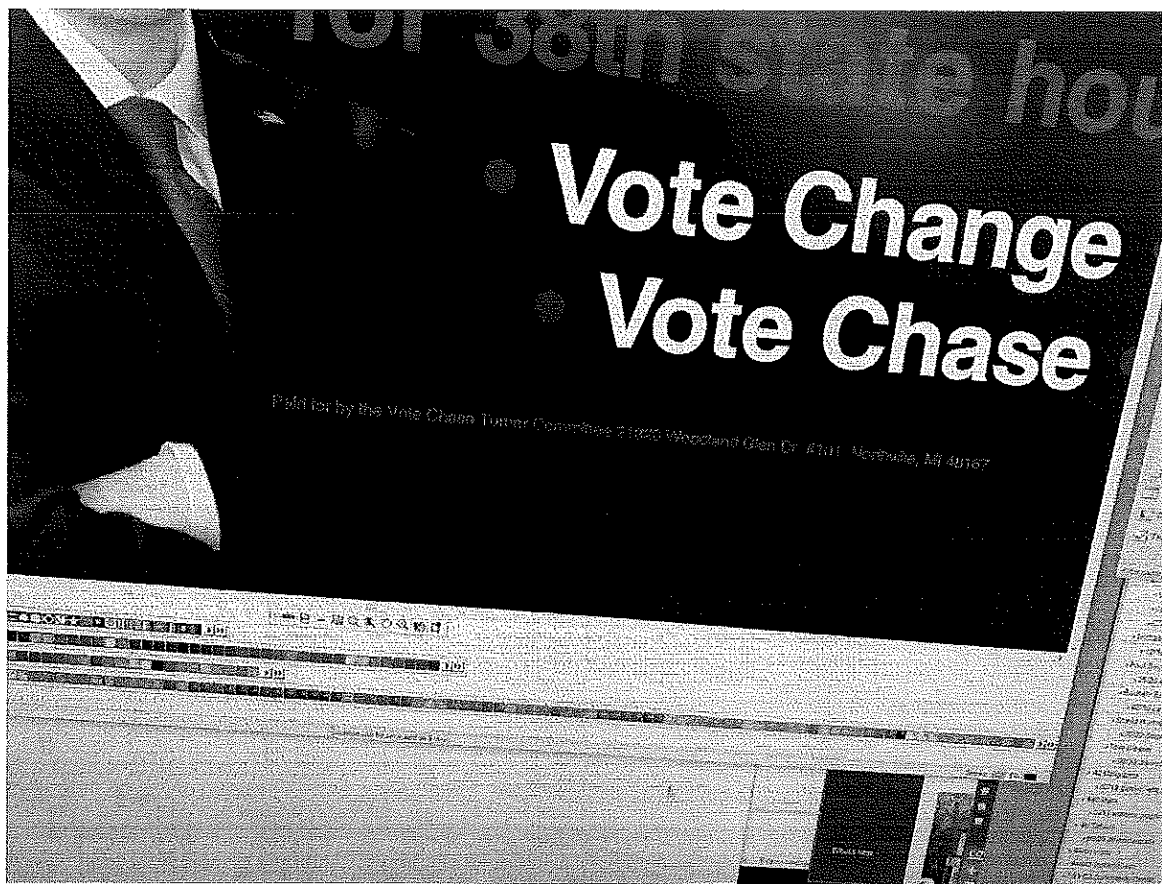
45' 6 1/2"

28' 25"

Chase Turner
Vote Change Vote Chase

rear window graphic

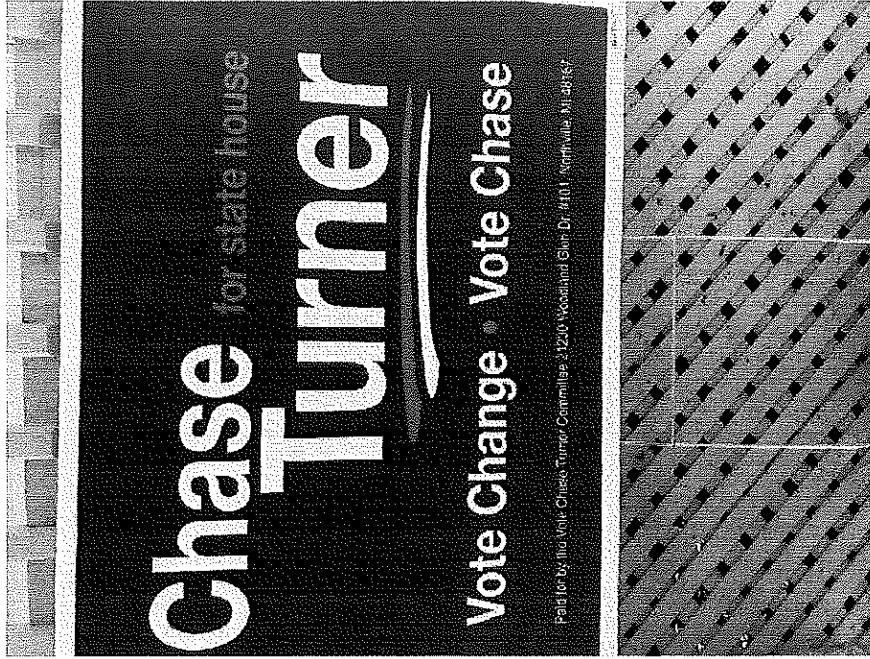
Exhibit A-2



Enlarged car wrap rear
window graphic.

Exhibit B-1

Photo of
yard sign



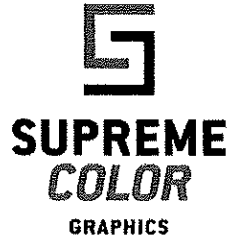


Exhibit D-1

letter from sign
vendor

11/10/2020

To Whom It May Concern,

We produced Coroplast yard signs for DLT Marketing using their artwork.

I've enclosed PDF proofs which show exactly what was printed. As you will see, each order/sign included the text: Paid for by Vote Chase Turner Committee 21320 Woodland Glen Dr. #101 Northville, MI 48167, printed on one or both sides.

Thank You,

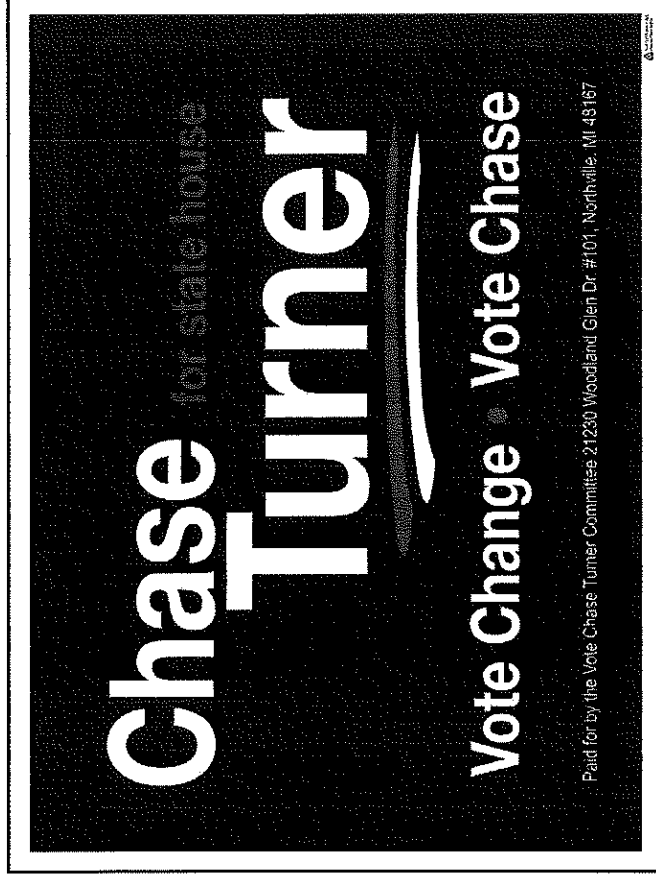
Carmen Micheli

Exhibit D-2

Sign vendor

Art work

✓



dimensions: 18 inches high x 24 inches wide
quantity: 100 Double Sided
media: 4Mil Coroplast



STATE OF MICHIGAN
JOCELYN BENSON, SECRETARY OF STATE
DEPARTMENT OF STATE
LANSING

January 27, 2021

Aaron Martinez
31168 Shorecrest Drive, #28308
Novi, MI 48337

Re: *Martinez v. Turner*
Campaign Finance Complaint
No. 2020-10-180-47

Dear Mr. Martinez:

The Department of State received a response to the complaint you filed against Chase Turner, which concerns an alleged violation of the Michigan Campaign Finance Act (MCFA), 1976 P.A. 388, MCL 169.201 *et seq.* A copy of the response is 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. You may send the response via email or directly to the Richard H. Austin Building, 1st Floor, 430 West Allegan Street, Lansing, Michigan 48918.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam Fracassi".

Adam Fracassi
Bureau of Elections
Michigan Department of State

c: Chase Turner



STATE OF MICHIGAN
JOCELYN BENSON, SECRETARY OF STATE
DEPARTMENT OF STATE
LANSING

May 4, 2021

Chase Turner
21320 Woodland Glen Drive, #101
Northville, MI 48167

Via email

Re: *Walters v. Harris*
Campaign Finance Complaint
No. 2020-10-180-47

Dear Mr. Turner:

The Department of State (Department) has finished investigating the complaint filed against you by Aaron Martinez alleging violations of the Michigan Campaign Finance Act (MCFA). This letter concerns the disposition of the complaint.

The complaint alleges that you published campaign materials which failed to contain a proper paid for by statement. Mr. Martinez stated that this was in violation of a prior warning the Department issued to you in 2018.

You responded by letter dated October 27, 2020 stating that to your knowledge, all materials used in your campaign contained a paid for by statement. First, you stated that vehicle wraps were prepared and contained a paid for by statement. To prove this, you provided a copy of the production proof which contained the paid for by statement. You next responded to Mr. Martinez's allegations that yard signs failed to contain a paid for by statement by providing pictures of your yard signs. You indicated that the paid for by statement was on the back of the yard sign. You again provided evidence from the sign producers who verified that they placed the paid for by statement on your signs.

The MCFA and corresponding administrative rules require a person who produces printed material that relates to an election 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 Department has reviewed the information submitted and concludes that the evidence is insufficient to find that a violation of the Act has occurred. The evidence shows that the paid for

Chase Turner
May 4, 2021
Page 2

by statement was properly placed onto campaign materials in accordance with the Act's requirements based upon the statements and proofs provided by the vendors.

Therefore, the Department dismisses the complaint and will take no further enforcement action.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam Fracassi". The signature is stylized with a large, sweeping "A" and a cursive "Fracassi".

Adam Fracassi
Bureau of Elections
Michigan Department of State

c: Aaron Martinez