

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

October 29, 2013

Richard Sollars 22190 Hunter Circle North Taylor, Michigan 48180

Dear Mr. Sollars:

The Department of State (Department) received three formal complaints filed by Alex Garza, Jeff Lamarand, and Linda Parker-Craig 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-related material. Copies of the complaints are 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), 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(5).

In support of their complaints, Ms. Parker-Craig and Messrs. Garza and Lamarand provided pictures of a sign and a copy of a picture of what appears to be that same sign which states "Rick Sollars for Mayor [,]" a copy of picture of a sign which states "RICK SOLLARS FOR MAYOR [,]" and a copy of a picture of a sign which states "Rick Sollars for Mayor [.]" It appears that there is no paid-for-by statement on these signs. Mr. Lamarand also provided a copy of the Itemized Expenditures Schedule 1B from your candidate committee filings.

Ms. Parker-Craig and Messrs. Garza and Lamarand also included copies of a picture of a portion of a sign, but it is not possible for the Department to ascertain a candidate name from the content of the copies.

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. <u>It is important to understand that the Department is neither making this complaint nor accepting the allegations as true.</u>

If you wish to file a written response to these complaints, you are required to do so within 15 business days of the date of this letter. Please send one single answer to all three complaints, and 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

Richard Sollars October 29, 2013 Page 2

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 complainants.

A copy of your reply will be provided to Ms. Parker-Craig and Messrs. Garza and Lamarand, 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(5) 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: Alex Garza
Jeff Lamarand
Linda Parker-Craig

#### Michigan Department of State Campaign Finance Complaint 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	gen de die morg de Nobel de de d Gestade				
Your Name Alex Garza	Daytime Telephone Number (313) 443 – 6106				
Mailing Address 5962 Jackson					
City TAYLOR	State MI	zip 48180			
Section 2. Alleged Violator					
Your Name Richard Sollars Jr.					
Mailing Address 22190 Hunter Circle South					
City TAYLOR	State M\	zip 48180			
Section 3. Alleged Violations (Use additional sheet if more space is needed.)					

Section(s) of the MCFA violated:

Section 47(1), 1976 PA 388, MCL 169.247(1), Section J

Explain how those sections were violated:

Campaign Signs do not have Contact / Paid for info on them Evidence that supports those allegations (attach copies of pertinent documents and other information):

(picture included)

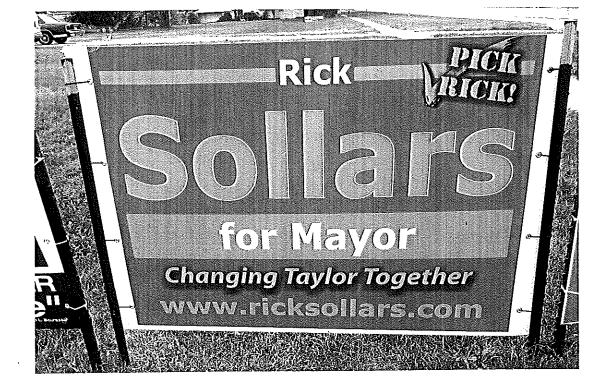
(Picture included) - One Picture of other signs of Mr. Sollars that do in fact Contain the disclosure Mr. Sollars is aware of Michigan law, but Chooses not to follow it.

		nowledge, information, and belief, formed after circumstances, each factual contention of this nce.
X	Signature of Complainant	Date
ecti	on 5. Certification without Eviden	ice (Supplemental to Section 4)
ndei		rery complaint. However, if, after a reasonable inquiry to certify that certain factual contentions are supported owing certification:
	grounds to conclude that the foll	owledge, information, or belief, there are lowing specifically identified factual orted by evidence after a reasonable Those specific contentions are:

Mail or deliver the completed complaint form and evidence to the following address:

Michigan Department of State
Legal and Regulatory Service Administration
Richard H. Austin Building - 4<sup>th</sup> Floor
430 West Allegan Street
Lansing, Michigan 48918

Revised 05/17/06



### Michigan Department of State Campaign Finance Complaint 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		Daytime Telephone Number	
Left Lamarand		734 552-8318	
Mailing Address			
PO BOX 1972			
City	State	Zip	
Taylor	ML	48180	
Section 2. Alleged Violator			
Your Name			
Richard Sollars			
Mailing Address	ŀ		
22190 Hunter G	rcle No	rth	
City	State	Zip	
Taylor	MI	48180	
Section 3. Alleged Violations (Use additional sl	heet if more space is	needed.)	
Section(s) of the MCFA violated:			
• •	750 1	110 2H2 /11 Salan	
Section 47(1) 1976 PA	+ 380, MCL	167, 291 (CI), seen on	
Explain how those sections were violated:		.A C	
No disclaimer on certain	campaign sig	AC)	
Evidence that supports those allegations (attach copies of	pertinent documents and	other information):	
photo documentation -	attached		
copy of campaign	expendito	re report	

(a) et i	A Country (Programs)	
Seci	tion 4. Certification (Required)	
	I certify that to the best of my known a reasonable inquiry under the concentration is supported by evidence	owledge, information, and belief, formed after ircumstances, each factual contention of this ce.
Х	Signature of Complainant	10-17-13 Date
Sect	ion 5. Certification without Eviden	ce (Supplemental to Section 4)
sect unde	ion 4 of this form be included in eve	215) required that the signed certification found in ery complaint. However, if, after a reasonable inquiry to certify that certain factual contentions are supported owing certification:
	grounds to conclude that the follo	owledge, information, or belief, there are owing specifically identified factual orted by evidence after a reasonable Those specific contentions are:
X	Signature of Complainant	Date
resp to \$	onsible for a civil violation of the M	at a person who files a complaint with a false certification is ACFA. The person may be required to pay a civil fine of up enses incurred by the Michigan Department of State and the filing of the complaint.

Mail or deliver the completed complaint form and evidence to the following address:

Michigan Department of State
Legal and Regulatory Service Administration
Richard H. Austin Building - 4<sup>th</sup> Floor
430 West Allegan Street
Lansing, Michigan 48918

Revised 05/17/06





Panging Taylor Togethe

2. Committee Name

Committee To Elect Richard (Rick) Sollars Jr.

#### **ITEMIZED EXPENDITURES SCHEDULE 1B CANDIDATE COMMITTEE**

Expenditure Name	Address	Fund Raiser	Purpose	Date	Amount
Direct		•	•	•	
First Catholic Credit Union	9300 Cooper, Taylor, MI 48180		Bank Charges	05/31/2013	\$5.00
First Catholic Credit Union	9300 Cooper, Taylor, MI 48180		Bank Charges	06/30/2013	\$5.00
Gonzales, Crystal	9874 Sil St, Taylor, MI 48180		Reimbursement	07/12/2013	\$630.00
Gonzales, Crystal	9874 Sil St, Taylor, MI 48180		Reimbursement	07/12/2013	\$630.00
Junior League World Series	22667 Maplelawn, Taylor, MI 48180		Media - Billboards / Outdoor Advertising	07/18/2013	\$1000.00
Local 26M	12305 Beech Daly Rd, Taylor, MI 48180		Fundraiser - Hall Rental	07/16/2013	\$100.00
Local 26M	12305 Beech Daly Rd, Taylor, MI 48180		Fundraiser - Hall Rental	07/16/2013	\$100.00
MESSENGER PRINTING	20136 ECORSE RD, TAYLOR, MI 48180-1957		Printing - Brochures	06/18/2013	\$190.27
MESSENGER PRINTING	20136 ECORSE RD, TAYLOR, MI 48180-1957	П	Printing - Brochures	06/25/2013	\$2060.08
MESSENGER PRINTING	20136 ECORSE RD, TAYLOR, MI 48180-1957		Printing - Brochures	07/17/2013	\$3005.10
News-Herald	1 Heritage Dr, Southgate, MI 48195		Media - Newspaper	07/16/2013	\$499.00
Pare, Rene	10615 William , Taylor, MI 48180		Reimbursement	07/03/2013	\$2733.56
Pare, Rene	10615 William , Taylor, MI 48180		Reimbursement ·	07/03/2013	\$2733.56
PayPal	2211 North First Street, San Jose, CA 95131		Bank Charges	07/11/2013	\$23.46
Phone Care	20142 Ecorse Rd, Taylor, MI 48180		Office - Campaign Office Maintenance	06/06/2013	\$360.00
Pia's Ristorante	21142 Ecorse Rd, Taylor, MI 48180	Ø	Fundraiser - Food & Beverage	06/27/2013	\$1075.00
Pia's Ristorante	21142 Ecorse Rd, Taylor, MI 48180	Ø	Fundraiser - Food & Beverage	06/06/2013	\$400.00
Portofino's on River	3455 Biddle Avenue, Wyandotte, MI 48192		Fundraiser - Hall Rental	07/08/2013	\$200.00
Sawicki and Son	1521 W. Lafayette, Detroit, MI 48216		Printing - Yard Signs	06/30/2013	\$1160.70
Sawicki and Son	1521 W. Lafayette, Detroit, MI 48216		Printing - Yard Signs	07/03/2013	\$1139.60
Taylor Northwest Little League	9350 Westlake, Taylor, MI 48180		Charitable Donation	03/01/2013	\$100.95
Wowway	P.O. Box 5715, Carol Stream, IL 60197-5715		Administrative - Utilities	06/18/2013	\$204.55
Nowway	P.O. Box 5715, Carol Stream, IL 60197-5715		Administrative - Utilities	07/12/2013	\$208.07
***************************************				SubTotal	\$15100.34

1. Committee I.D. Number 82-153965

2. Committee Name

Committee To Elect Richard (Rick) Sollars Jr.

## ITEMIZED EXPENDITURES SCHEDULE 1B CANDIDATE COMMITTEE

Expenditure Name	Address	Fund Raiser	Purpose	Date	Amount
Direct				•	
CC Embroidering and Silk Screening	25108 Hayes, Taylor, MI 48180		Printing Misc. (buttons, bumper stickers, t-shirts)	07/30/2013	\$530.00
Democratic Club of Taylor	23400 Wick Road, Taylor, Mi 48180		Media - Ad In Program Books	08/14/2013	\$350.00
Gonzales, Crystal	9874 Sil St., Taylor, MI 48180		Reimbursement	08/03/2013	\$2279.00
Local 26M	12305 Beech Daly Rd, Taylor, MI 48180	Ø	Fundraiser - Hall Rental	08/15/2013	\$250.00
MESSENGER PRINTING	20136 ECORSE RD, TAYLOR, MI 48180-1957		Printing - Brochures	07/29/2013	\$2265.75
News-Herald	1 Heritage Dr, Southgate, MI 48195		Media - Newspaper	08/01/2013	\$799.00
Portofino's on River	3455 Biddle Avenue, Wyandotte, MI 48192	Ø	Fundraiser - Food & Beverage	07/31/2013	\$1350.00
Wowway	P.O. Box 5715, Carol Stream, IL 60197-5715		Utilities - Internet Access	08/12/2013	\$208.07
	-	•		SubTotal	\$8031.82
	2" (17)			Total	\$8031.82

### Michigan Department of State Campaign Finance Complaint Form BUREAU OF ELECTIONS MI DEPT 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.).

Please print or type all information.

I allege that the MCFA was violated as follows:

1					
Your Name LINDA PARKER - CRAIG					
AIG	734-771-3771				
/					
Mailing Address 13363 CHESTHUT LN					
State	Zip				
MI	48180				
Your Name RICHARD SOLLARS					
Mailing Address  ZZ190 HUNTER CIRCLE NORTH					
State	Zip 48180				
	State MI  LLARS ER CIR  State				

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

Section(s) of the MCFA violated: SECTION 47(1), 1976 PA 388, MCL 169. 247 (1) SECTIONS

Explain how those sections were violated:

CAMPAIGN SIGNS DO NOT HAVE CONTACT/PAID FOR

INFORMATION ON THEM

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

(PICTURES INCLUDED). ONE PICTURE OF OTHER SIGNS OF MR. SOLLARS THAT DO NOT IN FACT CONTAIN THE DISCLOSURE. MR. SOLLAR IS AWARE OF MICHIGAN LAW, BUT CHOOSES NOT TO FOLLOW IT.

### 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 Craig Date OCT. 17, 2013

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

Section 15(6) of the MCFA (MCL 169.215) required 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:

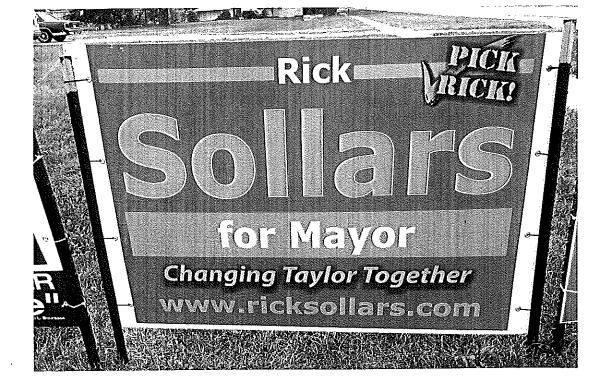
X Signature of Complainant Date

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.

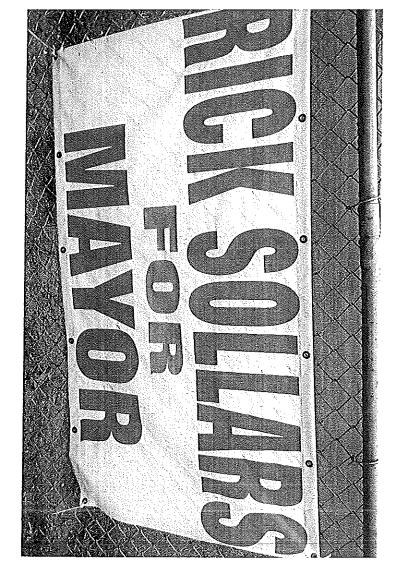
Mail or deliver the completed complaint form and evidence to the following address:

Michigan Department of State
Legal and Regulatory Service Administration
Richard H. Austin Building - 4<sup>th</sup> Floor
430 West Allegan Street
Lansing, Michigan 48918

Revised 05/17/06











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

December 11, 2013

Alex Garza 5962 Jackson Taylor, Michigan 48180

Jeff Lamarand P.O. Box 1972 Taylor, Michigan 48180

Linda Parker-Craig 13363 Chestnut Lane Taylor, Michigan 48180

Dear Mr. Garza, Mr. Lamarand, and Ms. Parker-Craig:

The Department of State received a response to the complaints you filed against Richard Sollars, which concern 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 <u>within 10 business days</u> of the date of this letter to the Bureau of Elections, Richard H. Austin Building, 1<sup>st</sup> Floor, 430 West Allegan Street, Lansing, Michigan 48918. Please file only one rebuttal statement signed by each of you.

Sincerely,

Lori A. Bourbonais

Bureau of Elections
Michigan Department of St

Michigan Department of State

c: Richard Sollars

### BUREAU OF ELECTIONS MI DEPT OF STATE

November 11, 2013 PM 20 PM 2: 37

Lori A. Bourbonais Bureau of Elections Michigan Department of State Richard H. Austin Building, 1<sup>St</sup> Floor 430 West Allegan Street Lansing, MI 48918

Dear Ms. Bourbonais:

Thank you for your letter of October 29, 2013, advising me of the alleged violations of the Michigan Campaign Finance Act. It is my understanding that the complaints claim that some of my campaign signs did not identify the name and address of the person paying for the signs. These signs were printed by a well-meaning friend, Mr. Rene (Rob) Pare', who apparently neglected to include the necessary disclosure on the signs. I am attaching a statement from Mr. Pare' explaining how the printing of these 38 signs came about.

Please note that the Committee To Elect Richard Sollars purchased over 2,300 campaign signs from Sawicki and Sons in Detroit, a sign company that specializes in political materials and campaign signs. All of the 2,300 signs purchased from Sawicki and Sons and all of my campaign literature contained the required disclosure pursuant to MCL 169.247(1). Mr. Pare', who owns a small sign company, donated approximately 38 signs and, apparently, mistakenly omitted the necessary identification language. Therefore, it appears that a little over 1 % of the Sollars' campaign signs did not include the language identifying who paid for those signs. I have spoken with Mr. Pare' and he has advised me that the omission of the disclosure language was entirely accidental and was certainly not intentionally done. I did not realize that the signs printed by Mr. Pare' did not have the necessary disclosure language until I received your letter of October 29, 2013. Upon receiving your letter, I contacted Mr. Pare' and requested that he either removed the signs or print stickers to apply to the affected signs. However, by this time it was only about three days before the election. Had this omission been brought to my attention sooner, I would have taken action sooner. None of the complainants notified me prior to notifying your office.

I hope this adequately responds to your questions. However, should you need any additional information, please feel free to contact me at the following address:

Richard Sollars, Jr. 22190 Hunter Circle, North Taylor, MI 48180

Thank you for your attention to this matter.

Rick Solfars

MI Custom Signs 20109 Northline Road Taylor, MI 48180



Phone: 734-946-7446 www.MIcustomSIGN.com World Class Service!

11/8/13

To Whom It May Concern,

I attended an open house at the Rick Sollars for Mayor Headquarters in September 2013 and heard that the Committee To Elect Richard Sollars had ordered over 2,000 lawn signs from a sign company in Detroit by the name of Sawicki and Sons. I also learned that the Sollars campaign was in need of some larger signs and a banner. Since I have my own sign company, MI Custom Signs, I knew I could print the larger signs and banner fairly quickly and I decided to do so and to donate the signs to the Sollars' campaign. My company very rarely makes political signs and when making up and printing the signs, I inadvertently omitted the language at the bottom of the signs regarding who had paid for the signs.

My sign company printed a total of 38 signs for the Sollars campaign, 30 that were 40" x 54" and 8 signs that were 60" x 14". I also printed one banner that was 14 inches x 8ft that I placed in front of my shop at 20109 Northline Road in Taylor.

At the same time I was printing signs for the Sollars' campaign, I also printed up 12 large signs for Cindy Bower, the City Clerk who was running for re-election. Like with the Sollars' signs, I omitted the language showing who had paid for the 12 Bower campaign signs.

I apologize for this oversight and I can assure you that it was inadvertent and unintentional. If I print up any campaign signs again in the future, I will make certain that they contain the required language.

Rene R. Pare'

President

MI Enterprises, LLC

734-486-9591 cell

rpare@micustomsigns.com

Indoor Poster
Monument and Information Signs
Golf Course Markings and Temporary Signs
Full Color large format Digital Printing
Vehicle Lettering and Wraps

Banners
Vehicle and Glass Lettering
Large Maps (city-wide)
Dasher Boards for Ice Rinks
LED Message Centers



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

February 14, 2014

Richard Sollars, Jr. 22190 Hunter Circle, North Taylor, MI 48180

Dear Mr. Sollars:

The Department of State (Department) has completed its investigation of complaints filed against you by Alex Garza, Jeff Lamarand, and Linda Parker-Craig 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-related material. This letter concerns the disposition of Mr. Garza's, Mr. Lamarand's, and Ms. Parker-Craig's complaints.

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(5).

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.

The complaints were filed by Mr. Garza, Mr. Lamarand, and Ms. Parker-Craig on October 18, 2013, and you filed a written response on November 20, 2013. None of the complainants filed a rebuttal statement.

Mr. Garza, Mr. Lamarand, and Ms. Parker-Craig alleged that your campaign signs did not contain complete and correct paid-for-by statements. In support of their complaints, Mr. Garza, Mr. Lamarand, and Ms. Parker-Craig provided pictures of a sign and a copy of a picture of what appears to be that same sign which states "Rick Sollars for Mayor [,]" a copy of a picture of a sign which states "Rick Sollars for Mayor." It appears that there is no paid-for-by statement on these signs. Mr. Lamarand also provided a copy of the Itemized Expenditures Schedule 1B from your candidate committee filings.

Mr. Garza, Mr. Lamarand, and Ms. Parker-Craig also included copies of a picture of a portion of sign, but it was not possible for the Department to ascertain a candidate name from the content of the copies.

Richard Sollars, Jr. February 14, 2014 Page 2

In response, you filed a letter which explained that a small portion of your campaign signs were printed by Rob Pare'. You further stated that you "did not realize that the signs printed by Mr. Pare' did not have the necessary disclosure language." You also stated that you "contacted Mr. Pare' and requested that he either [remove] the signs or print stickers to apply to the affected signs," and that his omission "was entirely accidental [.]" You also provided a letter from Mr. Pare' explaining his mistake.

While the Department believes that the evidence tends to show that your campaign material failed to contain a complete 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 [.]" The Department is satisfied that you took appropriate corrective measures once you were aware of the potential violation.

Additionally, 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(5), 215(10).

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

Sincerely,

Lori Bourbonais
Bureau of Elections

Michigan Department of State

c: Alex Garza
Jeff Lamarand
Linda Parker-Craig