



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

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

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 <i>Tanya Stewart</i>		Daytime Telephone Number <i>989-600-1367</i>	
Mailing Address <i>1969 West Hines Road</i>			
City <i>Sanford</i>	State <i>MI</i>	Zip <i>48657</i>	
Email (optional) [REDACTED]			

Section 2. Alleged Violator			
Name <i>Lawrence Henry</i>			
Mailing Address <i>1332 West Olson Road</i>			
City <i>Midland</i>	State <i>MI</i>	Zip <i>48640</i>	
Email (optional) [REDACTED] <i>989-708-7854</i>			
<i>www.FaceBook.com/Vote-2020-Lee-Township</i>			
Section 3. Allegations (Use additional sheets if more space is needed.)			

Section(s) of the MCFA alleged to be violated: \_\_\_\_\_

Explain how those sections were violated:

*See Attachment: PDF:*  
*Complaint on Lawrence Henry running for*  
*Trustee in Lee Township 2020*


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

*See Attachments: 1A, 2A, 2B, 2C, 2D, 2E, 2F,*  
*and 3A:PDF*

**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

7-15-20  
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:*

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X

\_\_\_\_\_  
Signature of Complainant

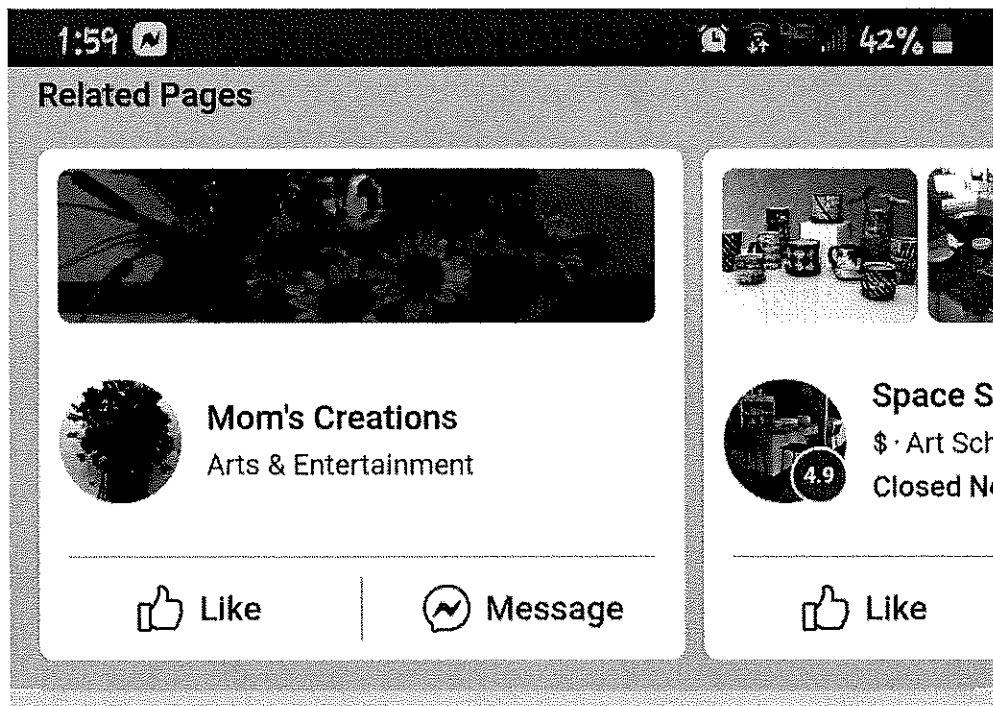
\_\_\_\_\_  
Date

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.

**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



### Vote 2020 Lee Township

July 14 at 9:56 PM · 🌐



This Face Book page was created by the Committee to Re-Elect Laura Dawson: Clerk, Geoffrey Gwisdala: Supervisor, Jessica Barber: Treasurer and Lawrence Henry: Trustee. It's purpose is to promote these 4 Candidate's. We have given you the link to the County List of candidates. Please help us help our Township. Vote August 4, 2020

<https://www.co.midland.mi.us/CountyClerk/Elections.aspx>



CO.MIDLAND.MI.US

County of Midland, Michigan > County Clerk  
> Elections

1 Share



Like



Comment



Share



### Vote 2020 Lee Township is at Hair Odyssey LLC.

July 13 at 4:48 PM · Midland, MI · 🌐



Send Message





3

2 Comments 6 Shares



Like



Comment



Share



**Vote 2020 Lee Township**

July 8 at 10:03 PM · Facebook for Android ·



We are hitting the pavement! "Here's our signs." Help us help the township. Vote August 4, 2020.



2

9 Shares



Like



Comment



Share



**Vote 2020 Lee Township**



Send Message



1 Share



Like



Comment



Share



**Vote 2020 Lee Township is at Hair Odyssey LLC.**



July 13 at 4:48 PM · Midland, MI ·



4



Like



Comment



Share



**Vote 2020 Lee Township**



July 13 at 11:32 AM ·

Everyone living in Lee Township, please educate yourselves on the candidates running for office. We really need people who



Send Message



Lawrence Henry for Trustee

[lives at: 1332 West Olson Road, Midland Michigan 48640]

### Section 3. Allegations

There is a post on the web page "Vote 2020 Lee Township" that is worded to read as though this person is up for Re-Election, when he is not. See Attachment 1A.

Just wondering who had paid for the elections signs he had made up and posed around the township, and also has posted pictures up on the web page "Vote 2020 Lee Township". See Attachments 2A, 2B, 2C, 2D, 2E, and 2F.

Does he not have to have the approval of the township to use that name in his elections materials?

Where did he get the flyers printed? See PDF Attachment: 3A

Locations of some signs posted around the township:

1] NW corner of M30 and Justin Ct. [not sure if on the property or on corner]

The nearby address is 841 North Meridian Road, Midland Michigan 48640. The signs are located south of driveway.

2] Corner of West Olson Road and North 8 Mile

The nearby address is 982 West Olson Road, and the driveway is on North 8 Mile.

3] On north side of West Olson Road, across the road from nearby address of 360 Kobler Road, Midland Michigan 48640 [which runs south off of west Olson road]

4] 1332 West Olson Road, Midland Michigan 48640

5] 1428 West Olson Road, Midland Michigan 48640

6] 528 and 526 North 9 Mile Road, Sanford Michigan 48657 [connected building]

2:00



July 4 at 10:36 AM · Facebook for Android



42%

Lee Township splash pad is in need of parts. Our care taker is trying to locate the needed parts. Sorry for any inconvenience. Have a safe and Blessed 4th of July. 🇺🇸🇺🇸🇺🇸

2 Shares



Like



Comment



Share

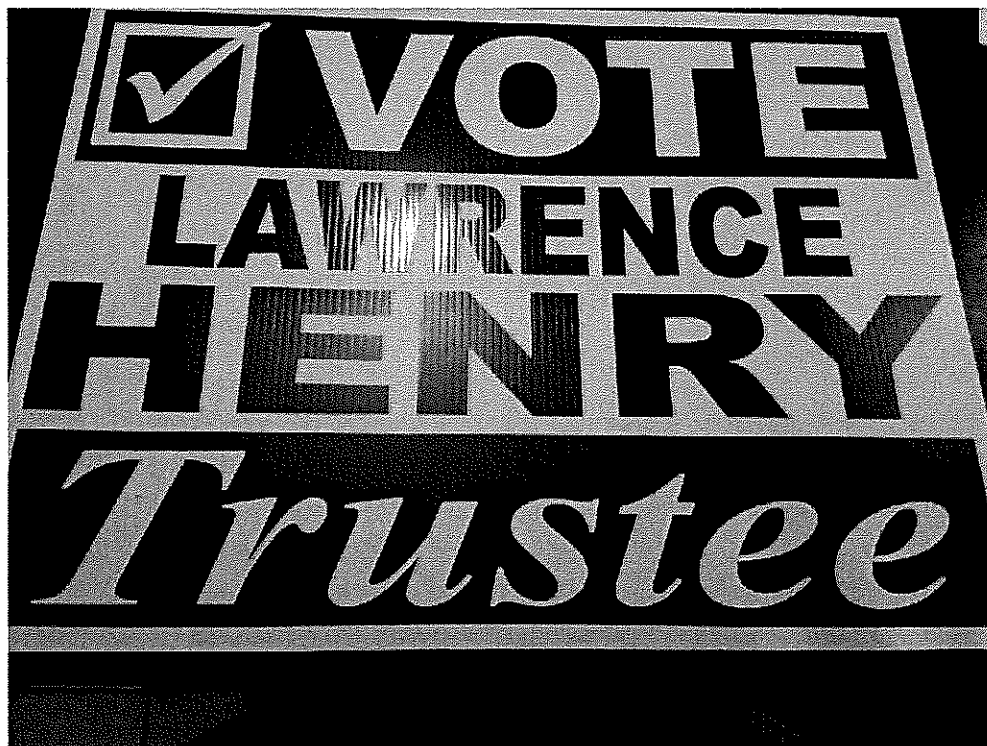


**Vote 2020 Lee Township**

July 3 at 4:04 PM · Facebook for Android



I am with Lawrence. I truly believe he can make a difference in Lee Township!



6



Like



Comment



Share



**Vote 2020 Lee Township** is 😊 feeling positive.

July 1 at 10:34 PM




Send Message



   47

1 Comment

 Like

 Share



**Sandi Broyles Brabaw** is at Hair Odyssey LLC.



July 13 at 4:47 PM · Midland, MI · 


Vote 2020



 2

1 Share


 Like

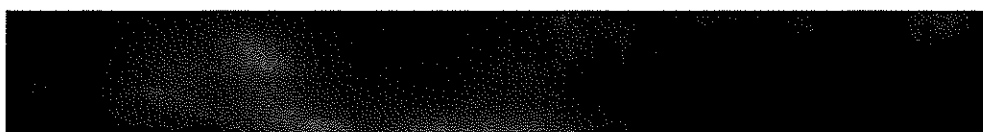
 Share



**Sandi Broyles Brabaw**



July 13 at 11:34 AM · 



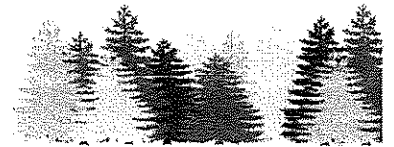
DAWSON  
LEE TWP CLERK

☒ VOTE  
LAWRENCE  
HENRY  
*Trustee*

**VOTE**  
**Jessica  
Barber**  
Lee TWP Treasurer

# LAWRENCE HENRY

## For Township Trustee



Hello Neighbors, my name is Lawrence Henry. I am 29 years old and a lifelong resident of Midland County. I grew up in Hope Township and moved to Lee Township with my lovely wife four years ago. I am a graduate of Northwood University and Delta College with a bachelor's degree in Business Management. I have a DUCKTORATE in leadership training through Walt Disney World. I am currently Union President of the local ESPA in Midland. I have always strived to help others and step up to lead when needed.

### **I am running for office of Trustee in Lee Township because:**

- ❑ I disapprove of township tax dollars wasted and not used effectively.
- ❑ I want to help clean up the township making it a more beautiful place to live.
- ❑ I want to help be a pillar in our community that is there to listen to the residents of Lee Township and help with their challenges when and where I can in a timely manner.



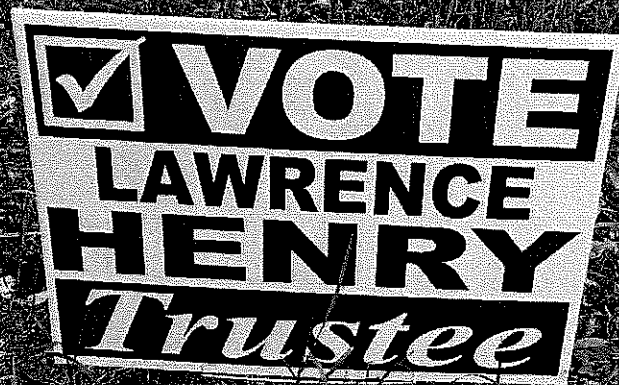
**Please feel free to email me or call with any questions or to request a yard sign:**

LawrenceHenry6554@gmail.com

989.708.7854

<https://www.facebook.com/Vote-2020-Lee-Township>







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

July 30, 2020

Lawrence Henry  
1332 West Olson Road  
Midland, MI 48640

Re: *Stewart v. Henry*  
Campaign Finance Complaint  
No. 2020-07-101-47

Dear Mr. Henry:

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 July 15, 2020 and alleges that you have distributed yard signs that did not include a proper paid for by statement. A picture of the yard signs is included with the complaint.<sup>1</sup>

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).

Upon review, the evidence submitted supports the conclusion that a potential violation of the Act has occurred. From the outset, the Department must consider whether it is an expenditure covered by the MCFA. The yard sign specifically states "Vote Lawrence Henry Trustee" which uses words of express advocacy as defined by the Act. MCL 169.206(2)(j). Because it urges voters to vote for you using words of express advocacy and was published by your committee, the signs are covered by the ambit of the Act and must include the paid for by statement outlined

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<sup>1</sup> The complaint raises other allegations, however, subjects outside of the MCFA cannot be the basis of a complaint filed under the Act. See MCL 169.215(5) ("[a] person may file with the secretary of state a complaint that alleges a violation *of this act* [.]")

Lawrence Henry  
July 30, 2020  
Page 2

under section 47. MCL 169.206(2)(j). However, the signs have completely omitted the required paid for by statement. Since this phrase is absent, the evidence supports the conclusion that a potential violation has occurred.

After reaching this conclusion, the Act 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.*

Given this, the Department concludes that a formal warning is a sufficient resolution to the complaint and 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 address of your committee.

Note that all printed materials referencing you or your candidacy produced in the future must include this identification statement. For all materials currently in circulation, the paid for by statement must be corrected. If this information has been included in your materials and you wish to rebut the Department’s conclusion, you must respond in writing to the Department within 15 business days of the date of this letter otherwise the Department will treat the complaint as resolved.

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).

Sincerely,

A handwritten signature in black ink, appearing to read "Adam Fracassi", with a stylized flourish at the end.

Adam Fracassi  
Bureau of Elections  
Michigan Department of State

Enclosure  
c: Tanya Stewart

## SOS, Disclosure

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**From:** Pretend Friend <pretendfriend0@gmail.com>  
**Sent:** Thursday, July 16, 2020 12:27 PM  
**To:** SOS, Disclosure; Pretend Friend  
**Subject:** Re: Complaint on Lawrence Henry running for Trustee in Lee Township 2020 Election  
**Attachments:** 2F.jpg

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

Here is the other attachment that I could not put in the first email.

On Thu, Jul 16, 2020 at 12:16 PM Pretend Friend <[pretendfriend0@gmail.com](mailto:pretendfriend0@gmail.com)> wrote:

Greetings,

I am writing this complaint out to you because I fear there might be some wrong doing, and or some things might be done on the shady side of what is right and fare to all.

I scanned the pages of the complaint form and are the attachments LH Page 1 and Page 2.

I am also very concerned about the complaint being shown to the people it is agents, because I fear retaliation from them or their supporters.

I have seen the Clerk [who this person is working with] at local meetings and have seen her and those she is in league with, and those that support her or she is working their agenda. They are not nice people at all. They are the kind that stalk and harass people in the community, and use various intimidation tactics on.

I understand that I need to give you my name when filing this complaint, but I need to be assured that they will not get my name when the complaint is processed or not. Otherwise myself and my family will come under attack by these people and their cohorts.

They are very shady and run the line of the law rather curvy every chance they can. Just so you have an idea of the kind of people you will be dealing with should you look into these allegations. I hope you do, and want to be wrong, but feel deep down inside that they are not playing by the same rules as everyone else is.

And in the end that will only hurt this community more so than it already has been so far this year. Let's try to end this year on a better note that it has been so far.

Thank you very much for your time, and I'm looking forward to at the least talking with you. If there is anything else you need from me, please let me know.

Sincerely,

Tanya Stewart

[If I do not know the number you are calling from I may not answer, but please leave me a message and I will return your call as soon as I can. Or whenever works best for you.]

## SOS, Disclosure

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**From:** Pretend Friend <pretendfriend0@gmail.com>  
**Sent:** Thursday, July 16, 2020 12:17 PM  
**To:** SOS, Disclosure; Pretend Friend  
**Subject:** Complaint on Lawrence Henry running for Trustee in Lee Township 2020 Election  
**Attachments:** 1A.jpg; 2A.jpg; 2B.jpg; 2C.jpg; 2D.jpg; 2E.jpg; Complaint on Lawrence Henry running for Trustee in Lee Township 2020.pdf; 3A.pdf; LH Page 1.pdf; Page 2.pdf

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