



Michigan Department of State

Campaign Finance and Financial Disclosure Complaint Form

This complaint form may be used to file a complaint alleging that someone violated the [Michigan Campaign Finance Act](#) (MCFA), the [Candidate for Office Financial Disclosure Act](#), or the [Public Officers Financial Disclosure Act](#) (financial disclosure acts). Electronic submission of the form to BOERegulatory@michigan.gov is strongly recommended. For instructions on how to complete this form, see the [Campaign Finance and Financial Disclosure Complaint Guidebook](#) document. All spaces are required unless otherwise indicated.

Section 1. Complainant

| | | |
|---|--|--------------|
| Your name Cassandra Gustafson | Daytime telephone number 734-674-7205 | |
| Mailing address w5451 Pine Drive | | |
| City Norway | State MI | Zip 49870 |
| Email (recommended) cassandra.gustafson5@gmail.com | | |

Section 2. Alleged Violator (Respondent)

| | | |
|---|-------------|--------------|
| Name Rico Meneghini | | |
| Mailing address 300 Section Street | | |
| City Norway | State MI | Zip 49870 |
| Email (recommended) rmeneghini@nvknights.org | | |
| Committee ID (optional) | | |

Please include email addresses to expedite processing time and mitigate mail delays.

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

I allege a violation of the following:

- MCFA
- Public officer disclosure
- Candidate disclosure

Identify the section(s) of the MCFA or relevant financial disclosure act section(s) alleged to be violated and explain how the section(s) were violated:

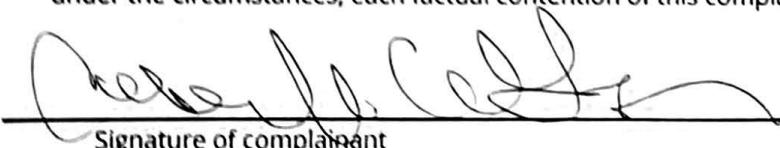
Public body employees that do not have "policy making authority" are prohibited from expressing views on behalf of the public body when "on the clock" or when working on behalf of the public body. Similarly, these employees may not use any of the public body's materials or resources to promote the election.

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

He sent out a bulk email to the entire district community with a "Vote Yes" Flyer. This flyer was sent out to all families along with the weekly elementary newsletter letter he sends each each.

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.



10/7/24

Signature of complainant

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:

Signature of Complainant

10/7/24

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 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. MCL 169.215(16).

The financial disclosure acts prohibit a person from filing a complaint with a false certification. MCL 169.313(7); MCL 15.713(7).

Section 6. Submission

Once completed, submit the complaint form with your evidence to BOERegulatory@Michigan.gov. Alternatively, you may 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

September
October
November
December

Weekly Newsletter [Inbox](#) 

Norway-Vulcan Area Schools <no-reply@nvkknights.org>
to me 

Using a new format here... If there are any issues, call the Elementary office at 906-563-943



Oct 6, 2024, 10:18 AM (2 days ago)

Add  to teacher hard th so v

schedule

Norway Vulcan PTO News

If you have any questions, contact us at norwayknightspto@gmail.com



2024-2025 PTO MEETING SCHEDULE

5:00 PM

Room 312 (Enter by Middle School Office)

September 18, 2024

January 15, 2025

October 16, 2024

February 19, 2025

November 20, 2024

March 19, 2025

December 18, 2024

April 16, 2025



We are always looking for more members, more ideas and more involvement from the NVAS community. Meetings are held the 3rd Wednesday of the month at 5:00 PM in room 312- Entrance C (by Middle School office).

What we do....

We host fun family events and sponsor in-school activities. We provide teachers funding for supplemental learning materials that benefit all students.

Additionally, we know admin, teachers, staff, and students work hard throughout the school year, so we provide small acts of kindness and gifts.

Upcoming Events

TRUNK OR TREAT

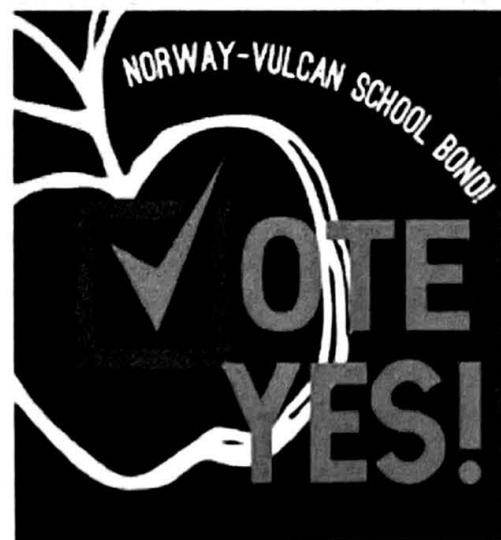
WHEN: FRIDAY OCTOBER 25TH

TIME: 5:30 - 7:00 PM

WHERE: NVAS UPPER PARKING LOT

Vote YES

November 5th



thank
you

We truly cannot thank you enough for your continued support through donations and participation in our fundraisers.



Norway PTO, EK-8





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

October 15, 2024

Rico Meneghini
300 Section Street
Norway, MI 49870

Re: *Gustafson v. Meneghini*
Campaign Finance Complaint No. 24-249

Dear Rico Meneghini:

The Department of State (Department) has received a formal complaint filed against you by Cassandra Gustafson alleging that you violated the Michigan Campaign Finance Act (MCFA or Act). Specifically, the complaint alleges that you used public resources for an election campaign. A copy of the complaint is included with this notice.

In Michigan, it is unlawful for a public body or an individual acting on its behalf to use or authorize the use of equipment, supplies, personnel, funds, or other public resources to make a contribution or expenditure. MCL 169.257(1). The words "contribution" and "expenditure" are terms of art that are generally defined to include a payment or transfer of anything of ascertainable monetary value made for the purpose of influencing the election of or made in assistance of a candidate. MCL 169.204(1), 169.206(1). An individual who knowingly violates this section is guilty of a misdemeanor punishable by imprisonment for not more than 1 year or a fine of not more than \$1,000.00, or both. MCL 169.257(4).

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 process is included in the Department's campaign finance complaint [guidebook](#).

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. Materials may be emailed to BOERegulatory@michigan.gov or mailed 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 answer will be provided to Cassandra Gustafson, who will have an opportunity to submit a rebuttal statement to the Department. After reviewing 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.

If you have any questions concerning this matter, you may contact the Regulatory Section of the Bureau of Elections at BOERegulatory@Michigan.gov.

Sincerely,

Regulatory Division
Bureau of Elections
Michigan Department of State

Enclosure

c: Cassandra Gustafson

From: [Rico Meneghini](#)
To: [MDOS-BOERegulatory](#)
Subject: Complaint 24-249
Date: Monday, October 28, 2024 2:13:01 PM

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

I unwittingly shared a flyer from our PTO on Oct 21, 2024.

-- The flyer was attached to my weekly communications sent out Sunday, October 6th, at 10:18 am. In my 8-year tenure as a principal, I have attached several flyers from school/fundraising groups. I should have proofread it.

-- I created and posted the post while on a Sunday.

-- I was at school using a school district computer...as I do these newsletters weekly.

Corrective steps

-- I have conferred with the Norway PTO about limitations their flyers will have if they wish to use the Norway-Vulcan weekly newsletter system as their distribution agent. Other school/fundraising groups will be contacted as well.

-- Moving forward, weekly communications will be proofread by employees to prevent misuse and mistakes in NVAS communications.

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

January 14, 2025

Cassandra Gustafson
W5451 Pine Drive
Norway, MI 49870

Re: *Gustafson v. Meneghini*
Campaign Finance Complaint No. 24-249

Dear Cassandra Gustafson:

The Department of State received a response from Rico Meneghini to the complaint you filed against them alleging a violation of the Michigan Campaign Finance Act, 1976 P.A. 388, MCL 169.201 *et seq.* A copy of the response is provided with this letter.

You may file a rebuttal statement after reviewing the response. If you elect to file a rebuttal statement, you are required to do so within 10 business days of the date of this letter. The rebuttal statement may be emailed to BOERegulatory@Michigan.gov or mailed to the Department of State, Bureau of Elections, Richard H. Austin Building, 1st Floor, 430 West Allegan Street, Lansing, Michigan 48918.

Sincerely,

Regulatory Division
Bureau of Elections
Michigan Department of State

Attachment
c: Rico Meneghini

From: Cassandra Gustafson
To: MDOS-BOERegulatory
Subject: Complaint 24-249
Rebuttal to Rico Meneghini

On October 21, 2024, Rico Meneghini claimed: "I unwittingly shared a flyer from our PTO." However, in the very next line, he states: "The flyer was attached to my weekly communications sent out Sunday, October 6th, at 10:18 am."

This timeline raises immediate inconsistencies. First, the flyer was sent on October 6, as part of the weekly communication for that week, which has no connection to October 21. Additionally, Rico Meneghini asserts that the flyer was shared "unwittingly," suggesting that he was unaware of attaching it. This raises serious questions about his claim. How does an administrator attach a two-part document from a school organization without being aware of its contents?

Furthermore, it is important to note that Rico Meneghini's wife is the PTO President (as documented in the attached evidence). As such, the communication and material would have come from her organization. Compounding this issue, the flyer in question features an image from the Facebook group titled "Vote Yes!," of which Rico Meneghini is a founding member. These facts undermine his assertion of unawareness and instead suggest a deliberate action or, at the very least, gross negligence in the exercise of his duties. His claim of "innocence by ignorance" does not constitute a valid defense and is inconsistent with the facts at hand.

If Rico Meneghini's intent was to claim that he failed to proofread the flyer prior to dissemination, that explanation could be more plausible. In such a case, his proposed corrective measure that "weekly communications will be proofread by employees to prevent misuse and mistakes in NVAS communications" may address future issues. However, it is worth noting that Rico Meneghini continues to send these communications on weekends (Saturdays and Sundays) when other staff are not present, raising the question of who is conducting the proofreading.

Moreover, as the administrator of two buildings and the individual responsible for sending weekly newsletters for both, Rico Meneghini has a professional and legal obligation to ensure all materials he sends are thoroughly reviewed. This responsibility is amplified by his "8-year tenure as a principal", during which he should have already established protocols to prevent such errors.

Regardless of the time or day the communications are sent, Rico Meneghini is acting in his official capacity as an agent of the district. He has openly admitted to using district resources—including district computers, office equipment, and the internet—paid for by taxpayer dollars, to disseminate this message. By doing so, and by sending out a flyer that advocates for a particular campaign, Rico Meneghini has directly violated campaign finance law.

While Rico Meneghini acknowledges his actions and suggests corrective measures, these steps cannot retroactively absolve him of the violation. The law was broken, and accountability must follow accordingly.

PLEASE NOTE: Rico Meneghini's response to my claim was written during the school day as noted on the date and time he provided (Monday, October 28, 2024 2:13:01 PM), once again implying he is using district time and resources for his own agenda.

From: [Cassandra Gustafson](#)
To: [MDOS-BOERegulatory](#)
Subject: Complaint #24-249
Date: Thursday, January 16, 2025 5:52:39 PM
Attachments: [Screen Shot 2025-01-16 at 11.21.46 AM.png](#)
[Screen Shot 2025-01-16 at 11.21.55 AM.png](#)
[Rebuttal Campaign Finance Complaint Complaint 24-249.pdf](#)

**CAUTION: This is an External email. Please send suspicious emails to
abuse@michigan.gov**

Please see attached letter. Evidence photographs included as well.



Hello! My name is Amanda Meneghini. I was born and raised in Norway. This is my fourth year serving on the PTO board, as President. My husband Rico and I have boys, Marco (11), Milo (9) and Mario (7). I'm looking forward to the new school year and all the PTO has planned to support the Norway-Vulcan Area Schools families. Here's to a great 2024-2025 school year!



Meet the PTO Board Members



President
Amanda Meneghini

Hello! My name is Amanda Meneghini. I was born and raised in Norway. This is my fourth year serving on the PTO board, as President. My husband Rico and I have boys, Marco (11), Milo (9) and Mario (7). I'm looking forward to the new school year and all the PTO has planned to support the Norway-Vulcan Area Schools families. Here's to a great 2024-2025 school year!



Vice President
Julie Mills

Julie Mills here! I'm a Norway girl born and raised and proud to have my kiddos in Norway too. I have three kids; Sienna (5th grade), Hazel (3rd grade) and Decker (3rd grade). We enjoy camping, swimming, biking, and school! You'll see me behind the desk at the elementary school. I absolutely love our school and community.

--
Cassandra Gustafson
(she/her)

*"Be a Flamingo.
Stay Balanced, Stand by Your Flock,
& Always be Fabulous"*



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

March 21, 2025

Rico Meneghini
300 Section Street
Norway, MI 49870

Re: *Gustafson v. Meneghini*
Campaign Finance Complaint No. 24-249

Dear Mr. Meneghini:

The Department of State has received a rebuttal to your response regarding your alleged violation of the Michigan Campaign Finance Act, 1976 P.A. 388, MCL 169.201 *et seq.* A copy of the rebuttal is provided with this letter.

At this point, the Department will commence the determination phase of the campaign finance complaint process, during which time all submitted materials will be reviewed. Within 45 business days of its receipt of the rebuttal, the Department will make a determination as to whether there may be reason to believe that a violation of the MCFA occurred. If you have any questions about this process, you may contact BOERegulatory@Michigan.gov.

Sincerely,

Regulatory Division
Bureau of Elections
Michigan Department of State

Attachment
c: Cassandra Gustafson



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

April 24, 2025

Rico Meneghini
300 Section Street
Norway, MI 49870

Re: *Gustafson v. Meneghini*
Campaign Finance Complaint No. 24-249

Dear Rico Meneghini:

The Department of State (Department) has finished investigating the campaign finance complaint filed against you by Cassandra Gustafson alleging that you violated the Michigan Campaign Finance Act (MCFA or Act). This letter concerns the disposition of that complaint.

The complaint alleged that used public resources when you sent your weekly newsletter to the district. The newsletter was emailed to the entire district and included a flyer from the Parent Teacher Organization. The flyer created by the Parent Teacher Organization included an advertisement urging voters to support a school bond.

You responded to the complaint. In your response, you claimed you admitted that the newsletter was shared using school resources. The newsletter is produced weekly and frequently contains information from outside organizations that impact the school. The flyer in question was not created using public resources but acknowledged failing to review it for potential campaign finance violations before including it in your newsletter. You have since notified the PTO and other organizations of limitation on flyers that they intend to have included in the weekly newsletter.

Cassandra Gustafson provided a rebuttal statement. In that statement, Gustafson alleges that this was an intentional act and not a failure to proofread the included flyers. Gustafson relies on the fact that your wife is the president of the PTO and that you send the newsletters on the weekend when staff doesn't have an ability to proofread them.

In Michigan, it is unlawful for a public body or an individual acting on its behalf to use or authorize the use of equipment, supplies, personnel, funds, or other public resources to make a contribution or expenditure. MCL 169.257(1). The words "contribution" and "expenditure" are terms of art that are generally defined to include a payment or transfer of anything of ascertainable monetary value made for the purpose of influencing the action of voters. MCL 169.204(1), 169.206(1). If not an individual, a person who knowingly violates this section is

guilty of a misdemeanor punishable by a fine up to \$20,000 or a fine equal to the amount of the improper expenditure – whichever is greater. MCL 169.257(4).

The Department must first determine if any public resources were used by the school that would be subject to the Michigan Campaign Finance Act. You admitted that school resources were used to send the weekly newsletter that contained the PTO flyer. However, you indicated that the PTO flyer was not created using school resources. Additionally, you made all organizations that have requested information to be included in the weekly newsletter aware of these limitations.

Upon review, the evidence submitted supports the conclusion that a potential violation of the Act has occurred. Rico Meneghini sent a newsletter that contained campaign materials covered by MCFA in violation of Section 57. This section contains a very limited number of exceptions for the use of public resources and the newsletter in this instance is not exempt under the act.

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 advises that Norway-Vulcan Schools must ensure that any future newsletters sent must not contain advocacy materials, this includes flyers prepared by a third party. Additionally, you proactively made third party organizations aware of these limitations going forward and the Department will treat this complaint as closed.

Please be advised that this notice has served to remind you of your obligations under the Act and this may be used in future proceedings as evidence that tends to establish a knowing violation of the Act.

Sincerely,



James Biehl, Regulatory Attorney
Regulatory Division
Bureau of Elections
Michigan Department of State

C: Cassandra Gustafson