



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		Daytime telephone number
Kirsten Sonnevile-Douglass		248-202-9771
Mailing address		
1703 Maddy Lane		
City	State	Zip
Keego Harbor	MI	48320
Email (recommended)		
ksd4wbsd@gmail.com		

Section 2. Alleged Violator (Respondent)

Name		
Nelson Hersh		
Mailing address		
5221 N. Bay Drive		
City	State	Zip
Orchard Lake	MI	48324
Email (recommended)		
dr1ortho@aol.com		
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:

169.247 Printed matter or radio or television paid advertisement having reference to election, candidate, or ballot question; name and address; identification or disclaimer; size and placement; rules; exemption; statement that payment made "with regulated funds"; communication exempted under section 6(2)(j); violation as misdemeanor; penalty; prerecorded telephone message; artificial intelligence.

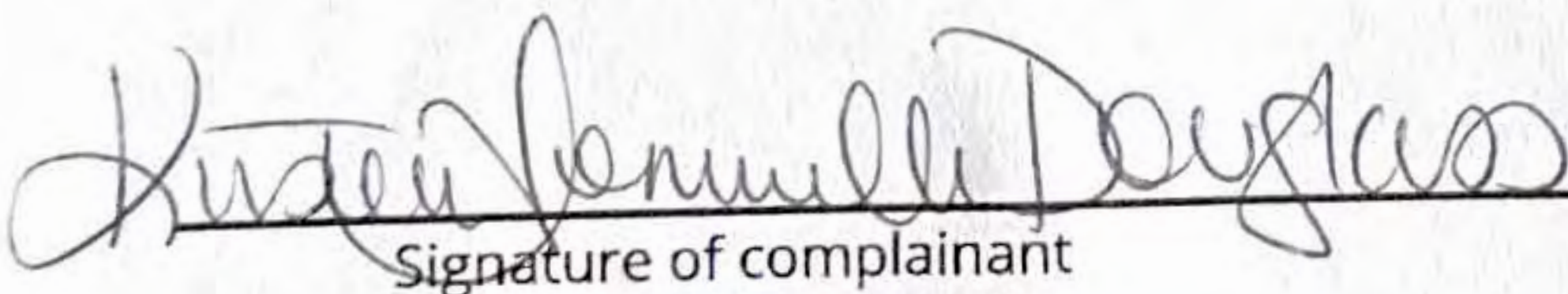
A printed and mailed "anti-candidate" postcard does not have identification or disclaimer. Mailer recieved in Orchard Lake and West Bloomfield.

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

Images of the front and the back of the postcard are attached

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

10/7/2024

Date

WARNING · WARNING · WARNING · WARNING · WARNING · WARNING · WARNING · WARNING

TOP 8 REASONS WHY:

KIRSTEN SONNEVILLE-DOUGLASS

IS THE WORST CANDIDATE FOR WBSBI

1. SHE WANTS TO INCREASE SCHOOL OF CHOICE TO SAVE ROOSEVELT.
2. HAS A PERSONAL POLITICAL + FINANCIAL AGENDA.
3. DESTROYED TRUST AS A KEEGO HARBOR PARKS AND REC CHAIR BY VOTING TO CANCEL THE MEMORIAL PARADE WHEN IT WAS NOT ON THE AGENDA.
4. WANTS TO CUT ATHLETICS.
5. AGAINST GIVING STAFF RAISES.
6. ONLY CARES ABOUT THE SCHOOL + ACTIVITIES HER KID IS IN.
7. HER FAMILY IS SUING THE DISTRICT TO DEMAND THAT ROOSEVELT IS A SCHOOL AGAIN.
8. DISRESPECTFUL AND DIVISIVE TOWARDS TEACHERS + STAFF

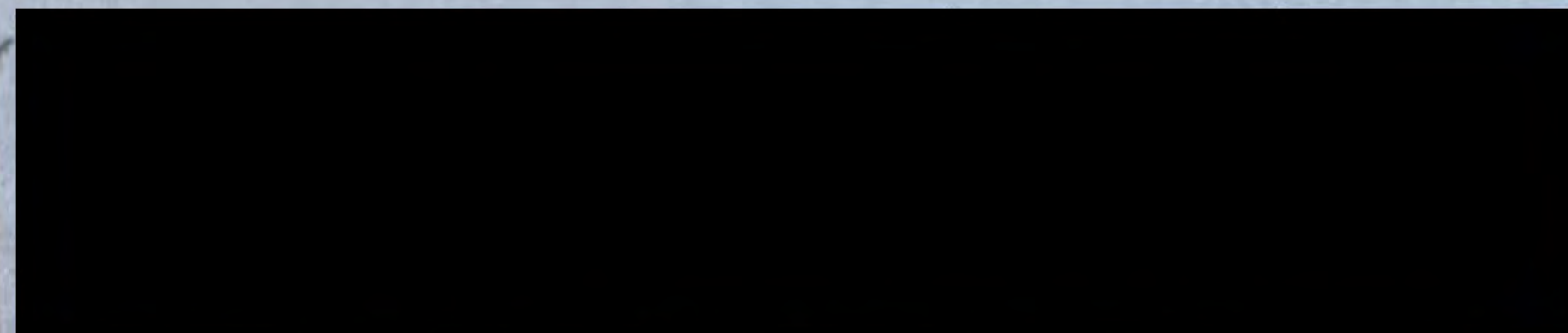
PLEASE VOTE FOR ANY 3: · BEATY · COMPTON · HERSH · MOORE

WEST BLOOMFIELD SCHOOL BOARD

VOTE FOR ANY 3



- ✓ **BEATY**
- ✓ **COMPTON**
- ✓ **HERSH**
- ✓ **MOORE**



From: [Nick Hersh](#)
To: [MDOS-BOERegulatory](#)
Cc: [Julie Beaty](#); [Terri Hoyer Compton](#)
Subject: For your information school board candidates
Date: Tuesday, October 15, 2024 5:20:35 PM

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

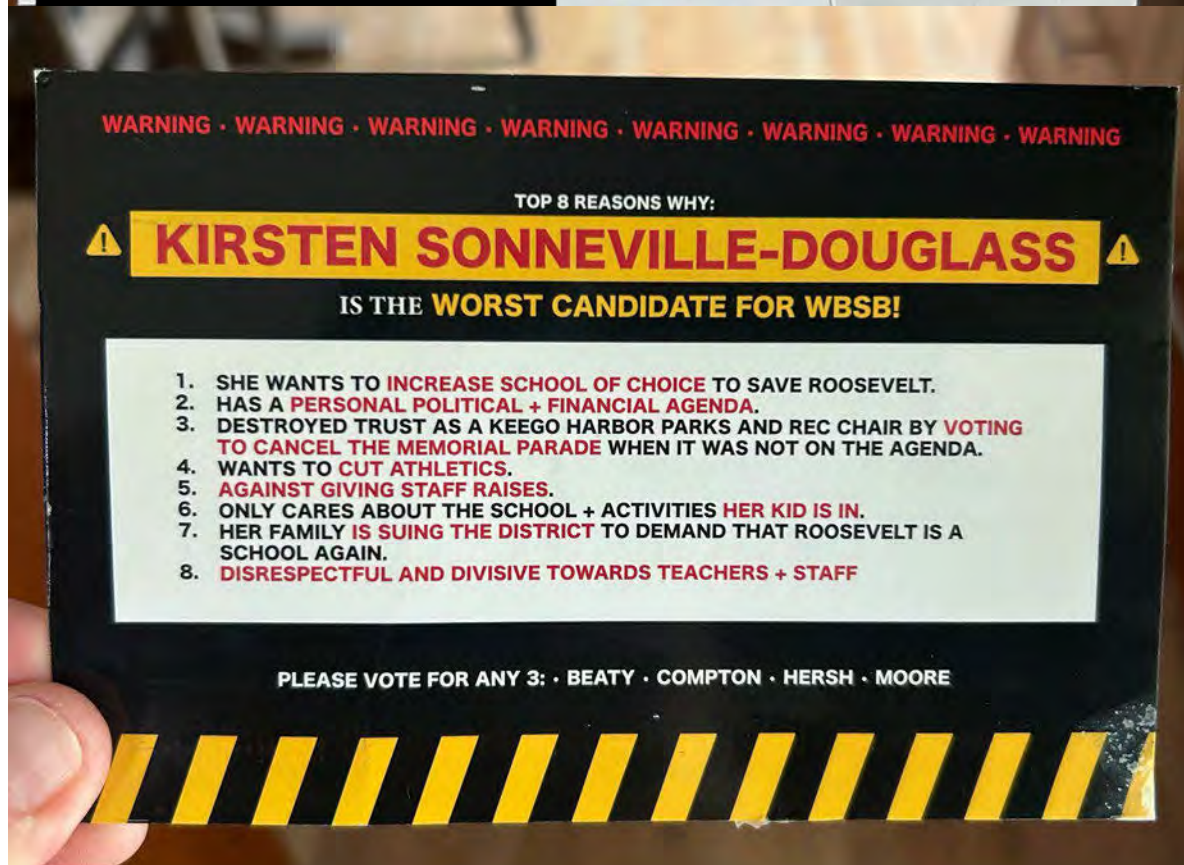
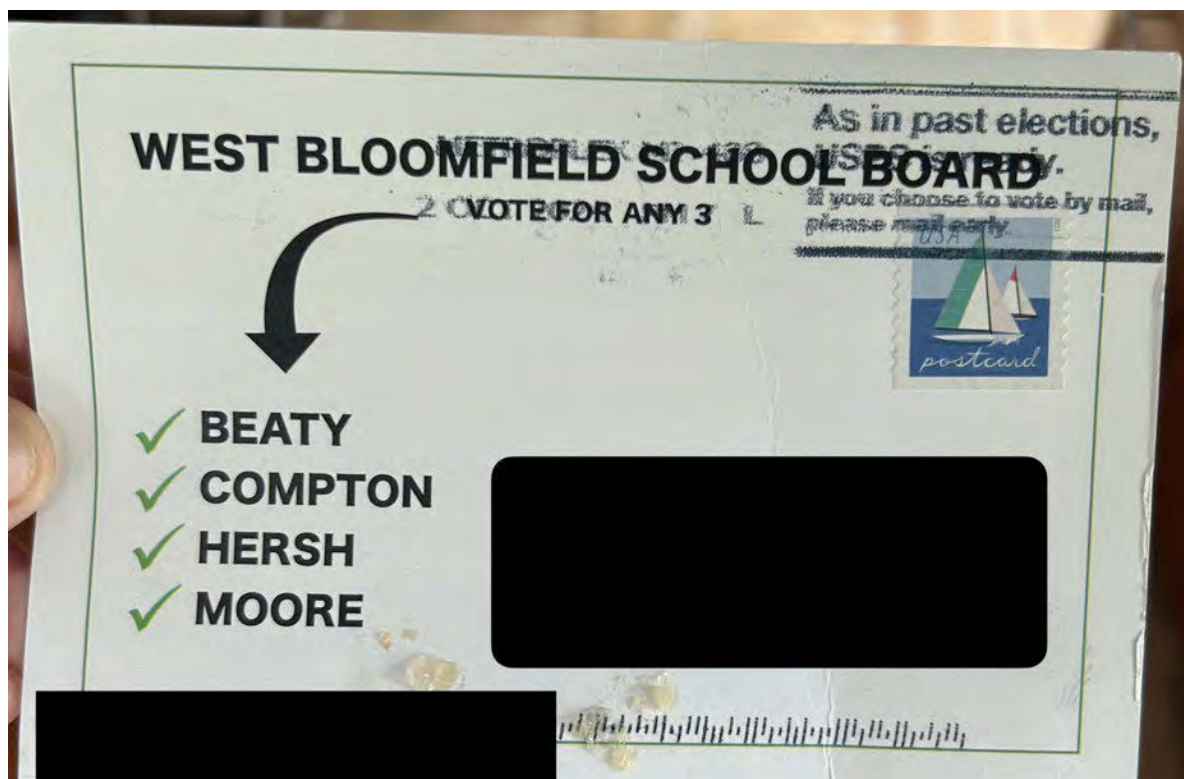
To whom this may concern,

It has been brought to our attention that a flyer with our names on it was distributed in our community (see included images). We did not authorize this flyer nor do we know who created it or have any prior information regarding it.

The three of us are running on a slate for the West Bloomfield School Board and all of our authorized and financed campaign material include our committee names and address in accordance with the campaign finance regulations.

**Thank you for your time,
Nelson Hersh, Julie Beaty and Terri Compton**

- *Committee To Elect Nelson Hersh to West Bloomfield School Board- 5221 North Bay Drive. Orchard Lake, MI, 48324 (#93264)*
- *Committee To Elect Julie Beaty- 3325 Erie Drive, Orchard Lake MI, 48324 (#95398)*
- *Terri Hoyer Compton for WB Board of Education- 6860 Tamerlane Drive, West Bloomfield, MI 48322 (#98341)*





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

October 16, 2024

Nelson Hersh
5221 N. Bay Drive
Orchard Lake, MI 48324

Re: *Sonneville Douglass v. Hersh*
Campaign Finance Complaint No. 24-245

Dear Nelson Hersh:

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 an identification statement on campaign materials. A photo of the material was included with the complaint; a copy of the complaint is enclosed.

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 the materials fall within the ambit of the MCFA. Because the materials explicitly advocate for the election or defeat of a candidate, or for the passage or defeat of a ballot proposal, the materials contain express advocacy as defined by the Act. MCL 169.206(2)(j). As explained above, such materials must contain a "paid for by" statement listing the name and address of the committee purchasing the materials. However, the evidence shows that the materials at issue here omit part or all of that required statement. That absence supports the conclusion that a potential violation of the MCFA 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 to BOERegulatory@Michigan.gov 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,

Regulatory Division
Bureau of Elections
Michigan Department of State

Enclosure

c: Kirsten Sonneville Douglass



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

January 17, 2025

Kirsten Sonneville-Douglass
1703 Maddy Lane
Keego Harbor, MI 48320

Re: *Sonneville Douglass v. Hersh*
Campaign Finance Complaint No. 24-245

Dear Kirsten Sonneville-Douglass:

The Department of State received a response from Nelson Hersh 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: Nelson Hersh



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

April 08, 2025

Nelson Hersh
5221 N. Bay Drive
Orchard Lake, MI 48324

Re: *Sonneville Douglass v. Hersh*
Campaign Finance Complaint No. 24-245

Dear Nelson Hersh:

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

The complaint alleged that you sent a postcard urging support for yourself and criticizing another candidate in your run for West Bloomfield School Board without including a proper disclaimer.

Initially, the Department determined that there was reason to believe that a violation had occurred and issued a warning to you on October 16, 2024.

You responded to the complaint. In your response, you claimed that you did not have any involvement in the postcard and that all of your campaign materials contain the proper disclosure for your candidate committee.

Sonneville Douglass did not provide a rebuttal to your response.

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 evidence submitted in this matter and finds that insufficient evidence has been presented to support a finding of a potential violation of the MCFA. Your assertion you had no involvement with the postcard and that Kirsten Sonneville Douglas did not provide any response linking you to the postcard leaves insufficient evidence that you were the party that violated Section 47 of MCFA. While the postcard does fail to include the required disclosure in Section 47 of MCFA, you are not the party that "paid for" the postcard.

Because the violation of the MCFA alleged in the complaint has not been substantiated by sufficient evidence against yourself, the Department dismisses the complaint and will take no further enforcement action against you. If you have any questions concerning this matter, you may contact me at BOERegulatory@Michigan.gov.

Sincerely,

A handwritten signature in black ink that reads "James Biehl". The signature is written in a cursive, slightly slanted style.

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

c: Kirsten Sonneville Douglass