



# 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](mailto: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
Mailing address		
City	State	Zip
Email ( <i>recommended</i> )		

## Section 2. Alleged Violator (Respondent)

Name		
Mailing address		
City	State	Zip
Email ( <i>recommended</i> )		
Committee ID ( <i>optional</i> )		

*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:

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

#### **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.

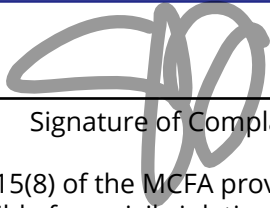
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Signature of complainant Date

## 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



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](mailto: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



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

May 7, 2024

Amy Kruppe  
22670 Maple Ct.  
Hazel Park, MI 48030

Re: *Dirkse v. Kruppe*  
Campaign Finance Complaint No. 24-026

Dear Ms. Kruppe:

The Department of State (Department) has received a formal complaint filed against you by Sheri Dirkse alleging that you violated the Michigan Campaign Finance Act (MCFA or Act). Specifically, the complaint alleges that you used school resources to advocate in support of the Hazel Park School Millage. 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 or made in assistance of the qualification, passage, or defeat of a ballot question. 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). A public body is, however, allowed to produce or disseminate factual information concerning issues relevant to the function of the public body. MCL 169.257(1)(b).

Ms. Dirkse alleges that Hazel Park schools began holding meetings advocating for the bond proposal beginning as early as December. Additionally, the complaint alleges that school resources were used to print literature supporting the millage proposal.

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](mailto:BOERegulatory@michigan.gov) or mailed to the Department of State, Bureau of Elections, Richard H. Austin 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 complainant.

A copy of your answer will be provided to Ms. Dirkse, 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](mailto:BOERegulatory@Michigan.gov).

Sincerely,

Regulatory Section  
Bureau of Elections  
Michigan Department of State

Enclosure  
c: Sheri Dirkse

Department of State  
Bureau of Elections  
Richard H. Austin Building, 1st Floor  
430 West Allegan Street, Lansing, Michigan 48918  
[BOERegulatory@michigan.gov](mailto:BOERegulatory@michigan.gov)

Re: Dirkse v. Kruppe, Campaign Finance Complaint No. 24-026

Dear Sir/Madam,

This is in response to the complaint filed by Sheri Dirkse alleging that I personally violated the Michigan Campaign Finance Act (MCFA or Act).

First, my address listed in the complaint is incorrect.

Second, in the section of the Complaint wherein Ms. Dirke is to “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,; she states as follows:

“There is an increasing concern that public funds are being spent on the Hazel Park School Mileage which conveys an expression of support for the bond mileage, all but explicitly stating the expression of a yes vote. Specifically, it appears that Hazel Park Public Schools and individuals working on its behalf are utilizing public resources to make a contribution or expenditure in support of the school mileage ballot question. I request an investigation to review this matter and to preserve the integrity of the election system and the proper use of public funds.”

In this statement:

- 1) There are no specific allegations whatsoever; without the “who, what, when and where” that allegedly occurred prior to February 8<sup>th</sup>, there is no way for me (or the District) to intelligently form a response;
- 2) In particular, there are no specific allegations that I personally engaged in any particular act in violation of the Act; and
- 3) Ms. Dirkse did not provide any evidence whatsoever to support this statement.

In response, I categorically deny the unsupported allegations, and in particular, that I personally or the District violated any provisions of the Act.

Third, in the section of the Complaint entitled “Certification Without Evidence,” Ms. Dirkse states as follows:

“The committee (98313 - SAY YES TO HAZEL PARK SCHOOLS) was not formed until February 8, 2024, yet meetings and literature in support of the bond were printed at Hazel Park Schools by Hazel Park employees prior to 2/8/2024. Meetings were held as

early as December 4, 2023 with materials presented to attendees at that time. All meetings were held in school district buildings.”

In this statement:

- 1) There are very limited specific allegations of an alleged violation; again, without the “who, what, when and where, ” there is no way for me (or the District) to form an intelligent response; moreover, there are no allegations that I personally engaged in any particular act in violation of the Act; and
- 2) Ms. Dirke’s did not provide any evidence whatsoever to support this statement.

In response, I categorically deny the unsupported allegations in the complaint, including that meetings were held in school district buildings in support of the bond, and in particular, that I personally or the District violated any provisions of the Act.

With respect to the allegation that literature in support of the bond “were printed at Hazel Park Schools by Hazel Park employees prior to 2/8/2024,” I again categorically deny such unsupported allegation. Attached are the two pieces of literature related to the bond that were printed at Hazel Park Schools by Hazel Park employees. One consists of two pages inside a flyer that was sent to all community members informing them of matters involving the Hazel Park Schools, including the bond proposal, and the second, a one-page folded brochure, also provides information about the upcoming election on the bond. Such pieces of literature were printed for the purpose of informing the community at large of the fact that an election was going to occur with respect to such bond proposal, as well as relevant information about the bond proposal. Both pieces of literature were reviewed by the District’s legal counsel to ensure compliance with all applicable laws, including the Michigan Campaign Finance Act, and the law firm expressly approved the language in the brochures as being in full compliance with the Act.

For all of the reasons stated above, I respectfully request that the Complaint against me be dismissed in its entirety.

Respectfully,

Dr. Amy Kruppe  
Superintendent, Hazel Park Schools



## WHAT PROJECTS ARE INCLUDED IN THIS BOND PROPOSAL?

All projects to be funded in this bond proposal fall into the following four categories, and are summarized below. Each respective school will have an individual list of projects.



### SAFETY & SECURITY

- Construction or remodeling of secure entries
- New exterior and interior doors with door locks
- New public announcement systems
- A new emergency generator at the High School



### IMPROVEMENTS TO LEARNING ENVIRONMENTS

- **A new, estimated 71,000 sf K-5 elementary building**
- Improvements to the auditorium at the High School, including adding a sound booth and lighting, audio & video improvements
- Upgrades to lighting, carpeting, furniture, ceilings and restrooms in select classrooms



### MECHANICAL / ELECTRICAL / HEATING & COOLING

- Upgrades or replacements to heating & cooling systems
- Replacement of boilers at select schools



### EXTERIOR BUILDING & SITE IMPROVEMENTS

- Roofing and roof system replacements
- Outdoor interactive learning spaces
- Window replacements
- Replacement of turf and track, home bleachers, scoreboard & pressbox at the High School

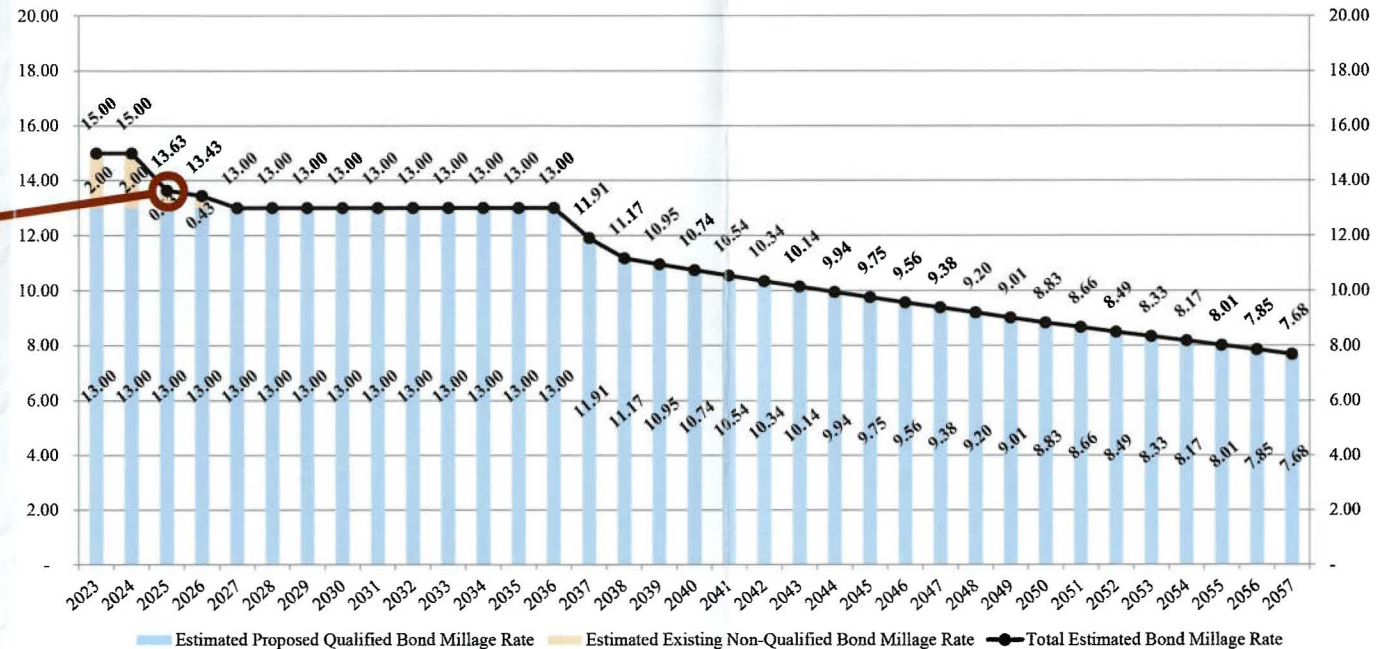
A complete summary of the projects for each building is available on the district website at: [www.hazelparkschools.org/hps-bond](http://www.hazelparkschools.org/hps-bond)

## HOW WILL THIS EFFECT MY TAXES?

If approved by voters, this proposal will extend the current millage for the entirety of the bond, resulting in a **NET ZERO MILL INCREASE FROM THE CURRENT LEVY.**

### Q: "HOW IS THERE NO INCREASE IN TAXES WHILE GENERATING \$150 MILLION?"

The millage rate is estimated to decline due to bond repayment and increases in taxable values. Additionally, as part of this proposal the millage will be reduced to 13.63 mills in 2025 as illustrated in the chart to the right.





# HP

INFORMATION  
AVAILABLE  
ONLINE



Follow the QR code with  
your phone camera or visit  
[hazelparkschools.org/hps-bond](https://hazelparkschools.org/hps-bond)

Paid For By Hazel Park Schools | 1620 E. Elza Hazel Park, MI 48030

# 2024 BOND PROPOSAL

**VOTE**  
ON OR BEFORE  
**TUES. MAY 7, 2024**



**NET ZERO  
MILL INCREASE  
FROM THE  
CURRENT LEVY**

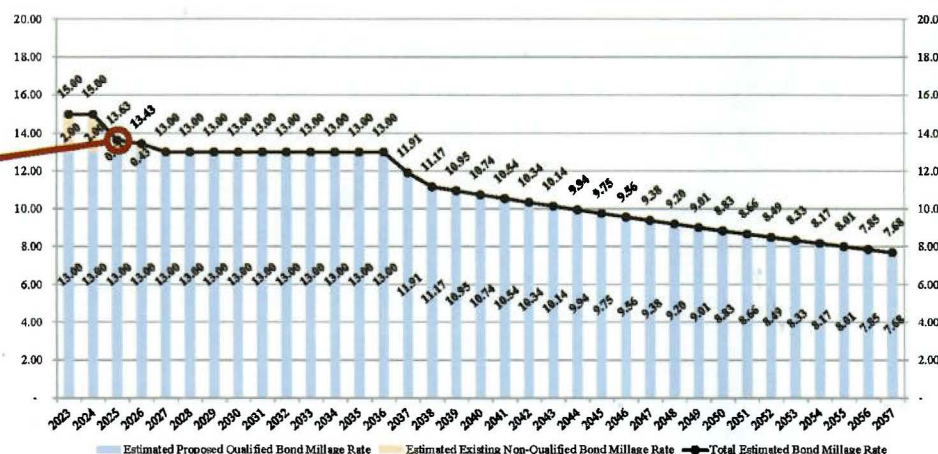
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## New K-5 Elementary School (replacement of Webster ECC)



LEARNING ENVIRONMENTS

- General Education Classrooms
- Young 5 classroom
- Kindergarten classrooms
- Special education resource room
- Self-contained rooms
- Media center and work room
- Gymnasium
- STEAM (Science, Technology, Engineering, Arts and Mathematics) lab
- Art classroom
- Kiln room
- Music room
- Full-service kitchen & cafeteria
- Administrative offices with family room/pantry
- Conference room



SAFETY & SECURITY

Secure Entry



SITE IMPROVEMENTS

Playgrounds  
Parking

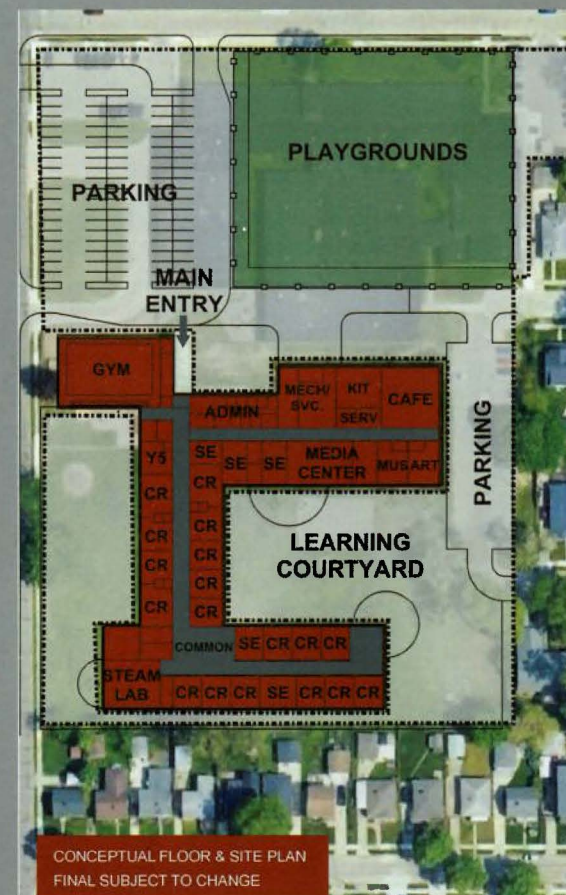
### WHAT IS STEAM?

STEAM stands for Science, Technology, Engineering, Arts and Mathematics. STEAM focuses on sparking imagination and creativity through the arts in ways that naturally align with STEM learning.

HAVE QUESTIONS?  
NEED MORE INFORMATION?

Follow the QR code or visit  
[hazelparkschools.org/hps-bond](https://hazelparkschools.org/hps-bond)  
or contact Superintendent, Dr. Amy Kruppe, Ed.D.  
Email: [amy.kruppe@myhpsd.org](mailto:amy.kruppe@myhpsd.org)

Paid For By Hazel Park Schools | 1620 E. Elza Hazel Park, MI 48030



CONCEPTUAL FLOOR & SITE PLAN  
FINAL SUBJECT TO CHANGE

## Early Childhood Center (former Hoover Elementary)



SAFETY & SECURITY

- Construct a secured entry/reception area
- Replace interior /exterior doors and locks
- Install a new fire protection system
- Replace Public Announcement System



IMPROVEMENTS  
TO LEARNING  
ENVIRONMENTS

- Replace select flooring
- Replace select ceiling areas
- Replace select interior walls
- Remodel restrooms
- Replacing classroom casework
- Replace select furniture



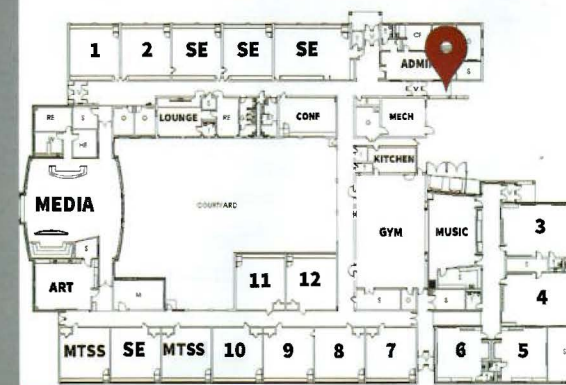
MECHANICAL  
ELECTRICAL  
HEATING & COOLING

Replace heating & cooling systems



EXTERIOR BUILDING &  
SITE IMPROVEMENTS

- Replace roof
- Replace windows
- Outdoor Interactive Learning Space
- Upgrade playground



CONCEPTUAL FLOOR PLAN  
FINAL SUBJECT TO CHANGE

HAVE QUESTIONS?  
NEED MORE INFORMATION?

Follow the QR code or visit  
[hazelparkschools.org/hps-bond](https://hazelparkschools.org/hps-bond)  
or contact Superintendent, Dr. Amy Kruppe, Ed.D.  
Email: [amy.kruppe@myhpsd.org](mailto:amy.kruppe@myhpsd.org)

Paid For By Hazel Park Schools | 1620 E. Elza Hazel Park, MI 48030



# VOTING INFORMATION



**ABSENTEE BALLOTS** are available starting **March 28, 2024** at your City or Township Clerk's Office. Contact your local precinct for hours of operation.

Starting April 23, 2024, voters may cast a ballot at their assigned early voting site(s) as a part of the nine day early voting period.

They can look up their assigned early voting site(s) up to 60 days prior to Election Day at [Michigan.gov/Vote](https://Michigan.gov/Vote).

**ELECTION DAY, POLLS ARE OPEN**  
**Tuesday, May 7, 2024** from **7AM - 8PM**

**POLLING LOCATIONS** and **ABSENTEE BALLOT** information are available at [Michigan.gov/vote](https://Michigan.gov/vote)



Our community will have the opportunity to vote on a bond proposal on the May 7, 2024 election ballot. If approved, it would provide \$150,000,000 for building & site improvements. If approved by voters, this proposal will extend the current millage for the entirety of the bond, resulting in a **net zero mill increase from the current levy**.

HAVE QUESTIONS?  
NEED MORE INFORMATION?

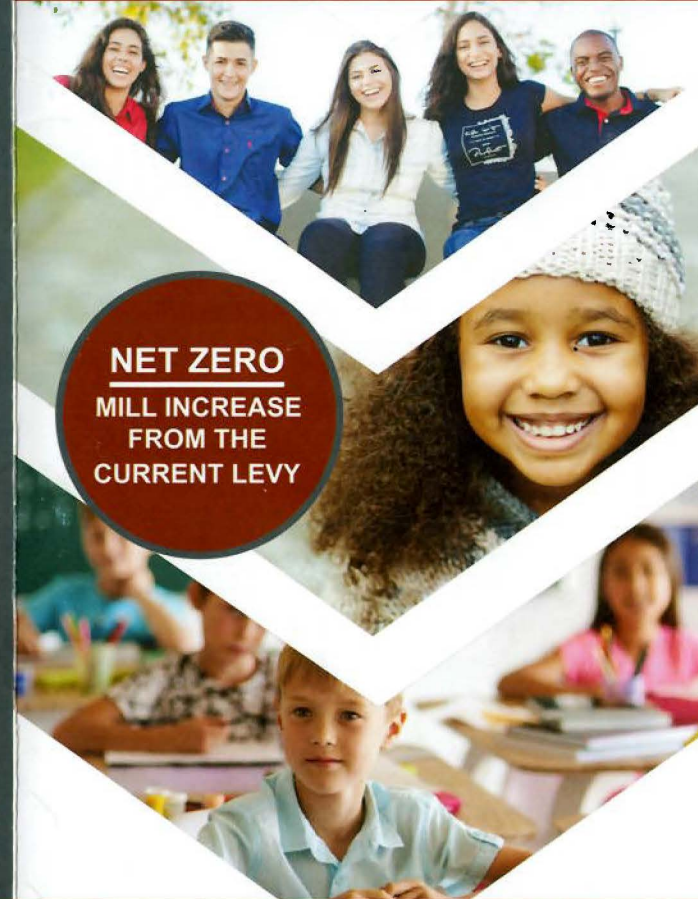


Follow the QR code with your phone camera or visit [hazelparkschools.org/hps-bond](https://hazelparkschools.org/hps-bond) or contact Superintendent, Dr. Amy Kruppe, Ed.D:  
Phone: 248-658-5221  
Email: [amy.kruppe@myhpsd.org](mailto:amy.kruppe@myhpsd.org)



**HAZEL PARK  
SCHOOLS**

## 2024 BOND PROPOSAL INFORMATION



**NET ZERO  
MILL INCREASE  
FROM THE  
CURRENT LEVY**

**VOTE TUESDAY, MAY 7, 2024**

Paid For By Hazel Park Schools | 1620 E. Elza Hazel Park, MI 48030

**VOTE TUESDAY, MAY 7, 2024**



**2 BOND PROPOSAL**  
HPS Superintendent Dr. Amy Kruppe talks about the upcoming bond proposal that will result in a net zero mill increase to residents.

**3 DOVE AWARDS**  
Karen Ryan, an ASD Teacher at Hazel Park Junior High, will be presented with the Inclusion Leadership Award at the 53rd Annual Dove Awards in March.

**4 HPS HONORS**  
Hazel Park Schools got to honor its three Teacher of the Year recipients -- Kim Dantial (High School), Todd Ross (Junior High), and Lori Hazen (Elementary).

**5 STATE QUALIFIERS**  
London Aleith, Tori Robison, and Madison Young -- earned red, white and blue medallions at a DECA competition earlier this year to qualify for state finals.

**13 HISTORY MAKERS**  
Our Varsity Girls Bowling team won a third straight MAC Gold Division championship and a second straight MAC Gold Tournament title.



**DRAMA STUDENT  
SCORES HIGH  
MARKS IN LANSING**

# HP THE PULSE

SPRING 2024 | Hazel Park Schools

Today's Learners, Tomorrow's Leaders



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

June 14, 2024

Sheri Dirkse  
91 W Harry Ave.  
Hazel Park, MI 48030

Re: *Dirkse v. Kruppe* Campaign Finance Complaint No. 24-026

Dear Ms. Dirkse:

The Department of State received a response from Ms. Kruppe 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 enclosed 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](mailto:BOERegulatory@Michigan.gov) or mailed to the Department of State, Bureau of Elections, Richard H. Austin Building, 1<sup>st</sup> Floor, 430 West Allegan Street, Lansing, Michigan 48918.

Sincerely,

Regulatory Section  
Bureau of Elections  
Michigan Department of State

Attachment  
c: Amy Kruppe





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

July 22, 2024

Amy Kruppe  
22670 Maple Ct.  
Hazel Park, MI 48030

Re: *Dirkse v. Kruppe*  
Campaign Finance Complaint No. 24-026

Dear Ms. Kruppe:

The Department of State (Department) has finished investigating the campaign finance complaint filed against you by Sheri Dirkse 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 improperly used Hazel Park public resources to support the school bond. Ms. Dirkse alleged that you allowed school facilities to be used to organize support for the bond and used school equipment to print literature supporting the bond.

You responded to the allegation by Ms. Dirkse by denying all of her allegations regarding the printing of literature and using public facilities to advocate for the bond proposal. In your response you included informative pamphlets that were sent to the community regarding the proposal.

In a letter dated June 14, 2024, Ms. Dirkse was given the opportunity to provide a rebuttal; to date, no rebuttal has been received.

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 or made in assistance of the qualification, passage, or defeat of a ballot question. 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). A public body is, however, allowed to produce or disseminate factual information concerning issues relevant to the function of the public body. MCL 169.257(1)(b).

From the outset, the Department must consider whether the mailer in question is an expenditure covered by the MCFA.<sup>1</sup> Under the Act, express advocacy is advocacy that "in express terms

advocate[s] the election or defeat of a clearly identified candidate.”<sup>2</sup> MCL 169.206(2)(j). The definition is intended “to restrict the application of this act to communications containing express words of advocacy of election or defeat, such as ‘vote for,’ ‘elect,’ ‘support,’ ‘cast your ballot for,’ ‘Smith for governor,’ ‘vote against,’ ‘defeat,’ or ‘reject.’” *See id.*

The mailer in question disseminated factual information, rather than words of express advocacy. The mailer noted the item was on the ballot, explained the bond’s implications, including the term of the renewal, and reminded readers of the date of Election Day, but did not expressly ask for a “yes” vote on the proposal.

If not explicitly advocating for a vote one way or the other, express advocacy can also take the form of non-explicit statements which nevertheless are “susceptible of no reasonable interpretation other than as an appeal to vote for or against a specific candidate.” *See FEC v. Wisconsin Right to Life, Inc.*, 551 US 449, 470 (2007). Given that the mailer can be reasonably interpreted as providing purely factual information, it cannot be considered the functional equivalent of express advocacy that *Wisconsin Right to Life* contemplates. Accordingly, the first allegation is dismissed.

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. A public body is allowed to produce or disseminate factual information concerning issues relevant to the function of the public body. MCL 169.257(1)(b). Because the mailer conveyed factual information and did not expressly advocate for voters to vote for or against a ballot question as defined by the Act, the Department dismisses the complaint and will take no further enforcement action.

If you have any questions concerning this matter, you may contact me at  
[BOERegulatory@michigan.gov](mailto:BOERegulatory@michigan.gov).

Sincerely,



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

c: Sheri Dirkse