



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
PAUL M. KARDASZ		586-495-7572
Mailing address		
29539 DOVER AVENUE		
City	State	Zip
WARREN	MI	48088
Email (recommended)		
PAUL.KARDASZ1@GMAIL.COM		

Section 2. Alleged Violator (Respondent)

Name		
City of Warren, as Respondent 1, and six additional respondents (see attached list of respondents)		
Mailing address		
One City Square		
City	State	Zip
WARREN	MI	48093
Email (recommended)		
mayor@cityofwarren.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:

Section 57 of the MCFA by respondents 1-7. See attached explanation.

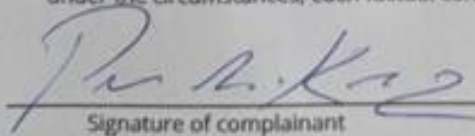
Evidence included with the submission of the complaint that supports the allegations:

See attached explanation.

Photographs and Social Media Posts: Evidence supporting the allegations includes photographs taken at the event and posts on social media from all respondents, clearly showing the presence of public resources used, campaign materials, endorsements, and activities of candidates such as Christina Hines and Mike McFall. These materials and activities were documented during the Warren City Pride event held on June 29, 2024, at Warren City Hall, demonstrating the integration of campaign-related content within a publicly sponsored event.

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

07/08/2024
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:

Photographs and Social Media Posts: Documentation of Mayor Lori Stone's official and personal social media accounts sharing images from the Warren City Pride event, where campaign materials for Christina Hines and Mike McFall were prominently displayed and actively promoted.

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. 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

Section 2. Alleged Violators (Respondents 1-7)

Respondent 1:

- **Name:** City of Warren
- **Mailing Address:** One City Square
- **City State Zip:** Warren, MI 48093
- **Email:** mayor@cityofwarren.org

Respondent 2:

- **Name:** Lori Stone, *as Mayor of the City of Warren*
- **Mailing Address:** One City Square
- **City State Zip:** Warren, MI 48093
- **Email:** mayor@cityofwarren.org

Respondent 3:

- **Name:** Monica Papasian, *as President of The Papasian Library for Equality and Inclusion*
- **Mailing Address:** 6106 Chicago Rd.
- **City State Zip:** Warren, MI 48092
- **Email:** Warrencitypride@gmail.com
- **Nonprofit Name:** The Papasian Library for Equality and Inclusion
- **Domestic Nonprofit Corporation ID Number:** 802598342

Respondent 4:

- **Name:** Christina Hines, *as President of Women of Warren*
- **Mailing Address:** 4817 La Chene Dr.
- **City State Zip:** Warren, MI 48092
- **Email:** WomenOfWarren586@gmail.com
- **Nonprofit Name:** Women of Warren
- **Domestic Nonprofit Corporation ID Number:** 802952531

Respondent 5:

- **Name:** Lori M. Stone, *as Candidate for Mayor of Warren*
- **Mailing Address:** 27582 Evelyn
- **City State Zip:** Warren, MI 4809
- **Email:** electloristone@gmail.com / loristone1980@gmail.com
- **Committee Name:** Committee to Elect Lori Stone Mayor
- **Committee ID:** 140265

Respondent 6:

- **Name:** Christina Hines, *as Candidate for Prosecuting Attorney*
- **Mailing Address:** 4817 La Chene Dr.
- **City State Zip:** Warren, MI 48092
- **Email:** christina@christinahinesformacomb.com
- **Committee Name:** Committee to Elect Christina Hines
- **Committee ID:** 140291

Respondent 7:

- **Name:** Mike McFall, *as Candidate for Representative in State Legislature*
- **Mailing Address:** PO Box 911
- **City State Zip:** Hazel Park, MI 48030
- **Email:** info@mikemcfall.com
- **Committee Name:** Friends of Mike McFall
- **Committee ID:** 520272

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

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:

MCFA Sec. 57 (MCL 169.257): This section prohibits the use of public resources to support or oppose a candidate or ballot proposal.

Allegations:

- **Use of Public Resources for Campaign Activities:**
 - **City of Warren:** Utilized official city social media channels and the city website to promote the Warren City Pride event, which featured political candidates. This implies the use of public resources (city personnel, website, social media) for campaign-related activities.
 - **City Personnel Involvement:** City employees were involved in logistical support for the event (e.g., setting up chairs, preparing the splash pad, atrium, and event stage). These activities converted into a monetary value based on salaries demonstrate the financial impact of using public resources for a campaign-related event.
- **City Logos and Endorsement:**
 - **City of Warren and Warren Cultural Commission Logos:** Observed on promotional materials, potentially implying city endorsement of the event, which included political campaigning.
- **Involvement of Mayor Lori Stone:**
 - **Mayor's Actions:** If Mayor Lori Stone was involved in or aware of using city resources to promote the Warren City Pride event where campaign activity took place, this constitutes a violation of Section 57.
- **Nonprofit Organizations and Political Campaigning:**
 - **Monica Papasian and *The Papasian Library for Equality and Inclusion*:** Use of city-owned facilities, city personnel, or public resources for an event promoting political candidates violates Section 57.

- **Christina Hines and *Women of Warren*:** Participation in the event where campaign materials were displayed and donations solicited (QR codes at the booth) implies misuse of public resources.
- **Specific Campaign Activities on Public Property:**
 - **Lori M. Stone's Campaign Sign:** Photographed with campaign sign at a public event (Warren City Pride), suggesting use of public property for campaign purposes.
 - **Christina Hines' Campaign Materials:** Displayed at the Women of Warren booth, including QR codes for donations, indicating solicitation on public property.
 - **Mike McFall's Campaign Booth:** Distributed campaign materials and solicited support at the event held on public property, using public resources.

Violations:

- **Use of Public Resources:**
 - Public resources (social media, website, city personnel) were used to support campaign activities related to the Warren City Pride event.
- **Implied City Endorsement:**
 - Use of city logos on promotional materials implies city endorsement of an event with political campaigning, violating Section 57.
- **Direct Involvement by Officials:**
 - Mayor Lori Stone's direct involvement and endorsement activities suggest misuse of public resources.
- **Nonprofits Engaging in Political Campaigning:**
 - Activities by The Papasian Library for Equality and Inclusion and Women of Warren, both 501(c)(3) organizations, involved political campaigning, violating the MCFA and potentially state and federal regulations for 501(c)(3) organizations.
- **Campaign Activities on Public Property:**

- Campaign signs and materials at the Warren City Pride event held on public property constituted violations under Section 57.

The violations of Section 57 of the MCFA primarily revolve around the misuse of public resources and public property for political campaign activities, the implied endorsement by city officials, and the involvement of nonprofit organizations in political campaigning, all of which contravene the legal prohibitions established to maintain the neutrality and proper use of public resources.

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

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

Summary of Alleged Violations:

Sec. 57 of the Michigan Campaign Finance Act prohibits the use of public resources for campaign activities unless specific exemptions apply. Each respondent, depending on their role and involvement in the Warren City Pride event or other activities, would need to ensure compliance with these regulations to avoid potential legal issues or penalties.

1. **City of Warren:** Utilized public resources for promoting the Warren City Pride event on official city social media channels and the city website, suggesting official endorsement of the event, which featured elements promoting political candidates. City logos, including that of the Warren Cultural Commission, were observed on promotional materials associated with the event, implying city support or endorsement of an event involving political campaigning. City employees were involved in logistical support for the event, which utilized public resources for an event that included campaign-related activities.
 - a. It was reported in the Macomb Daily that the City of Warren did not charge The Papasian Library for Equality and Inclusion for the City owned space. Whereas, the City recently charged for the same space \$850 to the organizers of the National Day of Prayer event.
 - b. **Public resources used include:**
 - i. City of Warren's Webpage Posting of the Event: Utilized city-managed web infrastructure and staff time to obtain from elsewhere promotional materials or create and maintain the event listing.
 - ii. City of Warren's MIWarren Webpage Posting of the Event: Similar to the main city webpage, this involves web hosting, content creation, and management by city employees.
 - iii. City of Warren Social Media Posting of the Event (Facebook and X): Involves staff time for content creation (or obtaining it from

elsewhere), posting, monitoring, and engagement with the public on official city social media channels.

- c. To determine the cost of these resources, one would need to account for:
 - i. **Staff Time:** Calculate the hours spent by city employees in creating, posting, and managing the content related to the event, including any engagement (replies, comments) on social media. This includes the deletion of the page on City of Warren website.
 - ii. **Web Hosting and Maintenance Costs:** Determine the portion of the city's web hosting and maintenance costs attributable to these specific event postings.
 - iii. **Promotional Value:** Assess the value of social media engagement based on metrics such as the number of posts, likes, shares, and comments, using industry-standard rates for social media marketing.
- 2. **Mayor Lori Stone:** Holds a position with policy-making responsibilities within the city government and was directly involved in or aware of the use of city resources to promote or endorse the Warren City Pride event, which featured political candidates and/or campaign-related activities. Additionally, her endorsements of Mike McFall and Christina Hines raise concerns about her failure to prevent or stop potential violations under Section 57 and failure to adhere to duties under the Warren City Charter.
 - a. **Relevant Provisions from the Warren City Charter** (*Sec. 7.3 - Duties of the Mayor*):
 - i. **Duty to Enforce Laws and Ordinances** (*Sec. 7.3(2)*): Mayor Stone is responsible for ensuring that all laws and ordinances are enforced within the city. If she observed any misuse of public resources for political purposes, she had a duty to take action to rectify the situation.
 - ii. **Responsibility for Efficient Administration** (*Sec. 7.3(10)*): The mayor must ensure the efficient administration of all city

departments. This includes monitoring and addressing any improper use of city resources.

3. **Monica Papasian:** Utilized city-owned facilities, city personnel, or other public resources for organizing or promoting the Warren City Pride event, which included elements promoting political candidates or campaign-related activities, constituting a violation of Sec. 57 and potentially state and federal laws governing 501(c)(3) organizations.
4. **Christina Hines:** As the President of Women of Warren, participated in the Warren City Pride event, where promotional materials endorsing her campaign for Prosecutor were displayed, potentially violating Section 57. Additionally, state and federal laws governing 501(c)(3) organizations prohibit direct or indirect participation in political campaigns.
5. **Lori M. Stone** (*Candidate for Mayor of Warren*): Attended the Warren City Pride event with campaign signage, potentially misusing public resources for campaign purposes in violation of Section 57. She was photographed holding a campaign sign alongside State Representative Mai Xiong and Michigan Attorney General Dana Nessel. This sign explicitly promotes her candidacy for mayor. The presence of the sign at a public event, such as Warren City Pride, where public resources like city property and facilities are used, raises concerns under section 57. Both Nessel and Xiong clearly witness to Stone with campaign signage.
6. **Christina Hines** (*Candidate for Prosecuting Attorney*): Displayed promotional materials for her campaign at the Warren City Pride event, potentially using public resources for campaign purposes in violation of Section 57. These materials included QR codes soliciting donations and directing individuals to her campaign's Facebook page and website. The presence of QR codes for donations on campaign materials at a public event raises concerns about soliciting contributions on public property. Section 57 prohibits candidates from soliciting contributions on public property or using public resources for campaign purposes.
 - a. On June 29, 2024, at 2:27 PM, Christina Hines, as a candidate for Macomb County Prosecutor, posted on her social media account,

"Christina Hines for Macomb County Prosecutor," expressing support for the LGBTQ+ community: "We have a whole lotta love for our LGBTQ+ family in Warren! Happy #WarrenCityPride." This post included eight images. Notably, one image featured Hines, Lori Stone, and Mai Xiong in front of the area where the Women of Warren booth was staged. Another image showed Hines, Dana Nessel, Lori Stone, and Mai Xiong standing behind the Women of Warren banner. Additionally, there was an image of Hines and Dana Nessel making heart shapes with their hands or fingers.

7. **Mike McFall:** Maintained a booth at the Warren City Pride event with campaign materials, potentially using public property to support campaign activities in violation of Section 57. At his booth were "Vote Mike McFall Democrat for State Representative" lawn signs, and Representative McFall handed out other campaign-related materials such as campaign business cards and campaign literature.

The multiple roles and associations of Monica Papasian, Lori Stone, and Christina Hines across different organizations raises serious concerns regarding potential violations under Section 57 of the Michigan Campaign Finance Act (MCFA). Their simultaneous involvement in both charitable organizations and political campaigns introduces significant risks of conflicts of interest, misuse of public resources, and violations of nonprofit and election laws.

Monica Papasian, as a member of the City of Warren Cultural Commission and President of The Papasian Library for Equality and Inclusion, potentially affiliated with Women of Warren, along with Mayor Lori Stone, who serves as Mayor of the City of Warren and is associated with the Committee to Elect Lori Stone Mayor and possibly Women of Warren, and Christina Hines, President of Women of Warren and a candidate supported by the Committee to Elect Christina Hines, are implicated in activities that may blur the lines between charitable activities and political campaigning.

These interconnections suggest a risk of leveraging nonprofit status and public roles to support political campaigns, which is strictly prohibited under federal and state laws governing nonprofits and election activities. Such actions could undermine the neutrality

expected of charitable entities and public officials, potentially leading to legal repercussions including the loss of tax-exempt status for nonprofit organizations and penalties under the MCFA.

The involvement of these individuals in events like Warren City Pride, where promotional materials for political campaigns are seemingly integrated with charitable fundraising efforts, heightens concerns about compliance with legal boundaries regarding political neutrality and the appropriate use of nonprofit resources. Especially considering Mayor Stone appears on the websites of Mike McFall and Christina Hines as someone who endorses both candidates.

The Warren City Pride fundraising event, promoted by the City of Warren, was positioned as a family-friendly celebration of LGBTQIA+ Pride and a means to foster community inclusivity. It featured a range of activities such as community gatherings, entertainment, educational sessions, vendor booths, and fundraising opportunities.

Unfortunately, the public benefit was compromised from this event due to allegations of misuse of public resources for political purposes, potential violations of nonprofit regulations, and concerns regarding transparency and ethical conduct in event management. These issues cast doubt on the event's integrity as a community celebration and fundraising effort, potentially eroding trust and support from the broader public.

The allegations surrounding the Warren City Pride event align closely with the legislative intent of Section 57, highlighting the imperative for public bodies to uphold neutrality in elections and to ensure proper stewardship of public resources for their intended purposes, free from partisan influence or misuse.

The allegations surrounding the Warren City Pride fundraising event bear striking resemblance to past instances of misuse of public resources, such as the case involving Mayor Fouts' 2016 State of the City address (*see Drolet v. Ghanam*). In both scenarios, there are serious concerns regarding the improper use of taxpayer-funded resources for activities that intersect with political campaigning.

- **Similar Misuse of Resources:** Like the 2016 State of the City event, the Warren City Pride event organized by City officials allegedly utilized public resources—including personnel, facilities, and promotional materials—in a manner that blurred the lines between community-oriented activities and political advocacy.
- **Legal and Ethical Concerns:** These actions raise significant legal and ethical questions about compliance with Michigan's Campaign Finance Act and other regulations intended to uphold the neutrality of public bodies in electoral processes. The misuse of public funds for events that blend charitable activities with political campaigning undermines the integrity of governance and public trust.
- **Impact on Public Perception:** Both incidents erode public confidence by suggesting favoritism, misuse of taxpayer money, and potential breaches of ethical conduct by public officials. Such actions can lead to perceptions of unfairness and inequality in the application of public resources.
- **Consistent Application of Laws:** It is crucial for the State to apply campaign finance laws consistently across different cases to uphold the legislative intent of promoting fairness, transparency, and impartiality in elections. By addressing these concerns with diligence and impartiality, the State can reinforce accountability in governance and ensure that public resources are used responsibly for the benefit of all citizens.

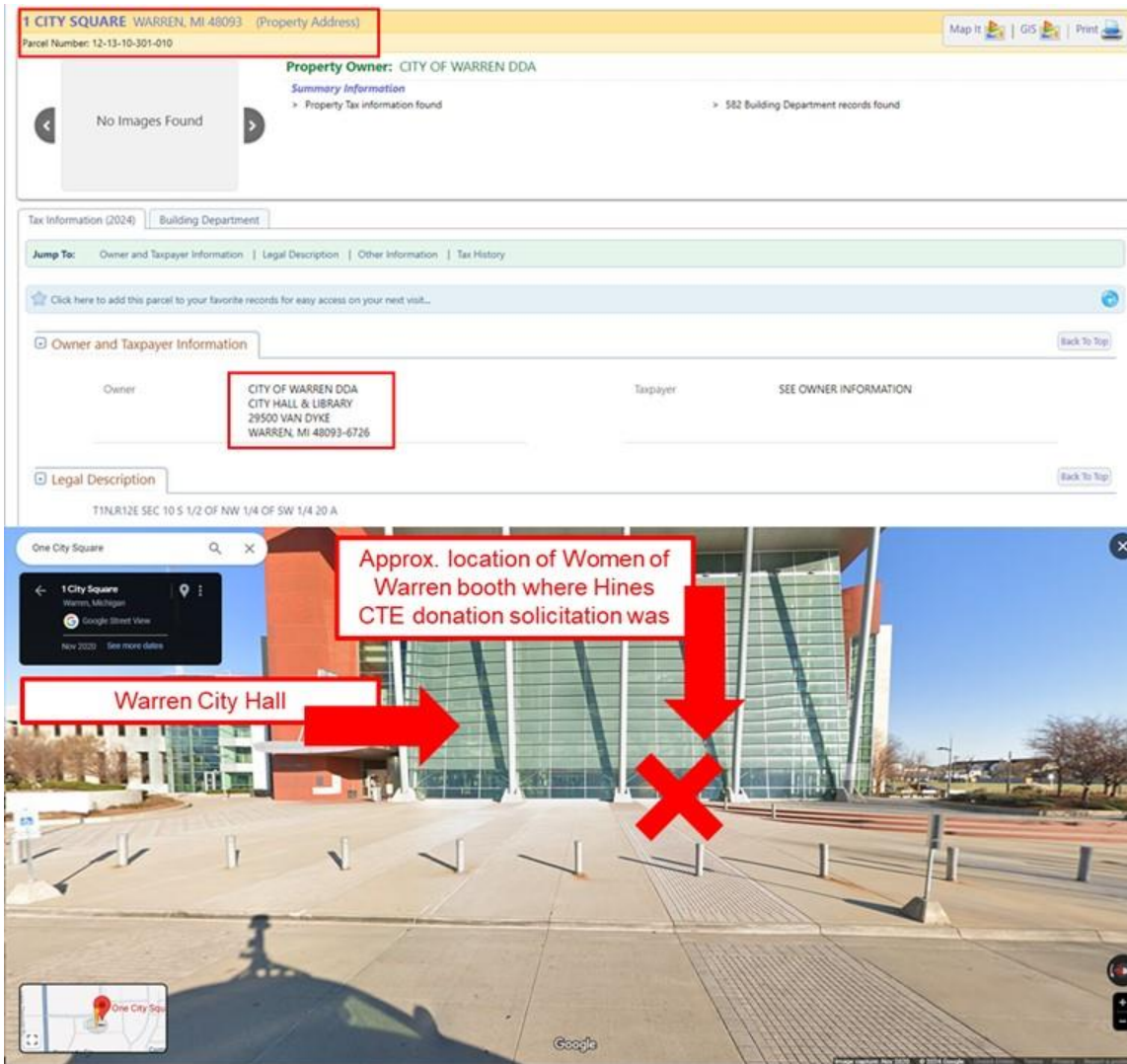
In light of these parallels, it is imperative for the State to thoroughly investigate the allegations surrounding the Warren City Pride event and take appropriate measures to uphold the rule of law and protect the integrity of democratic processes.

Similar to another past instance involving former Mayor James R. Fouts who used the State of the City Address to overtly endorse political candidates (*see Schroder v. Fouts*), the Warren City Pride event also exhibited the solicitation of donations for candidates and other campaign activities while prominently featuring political candidates and office holders. Despite being ostensibly organized under the auspices of a 501(c)(3) nonprofit, The Papasian Library for Equality and Inclusion, the event blurred the lines between nonprofit advocacy and political campaigning.

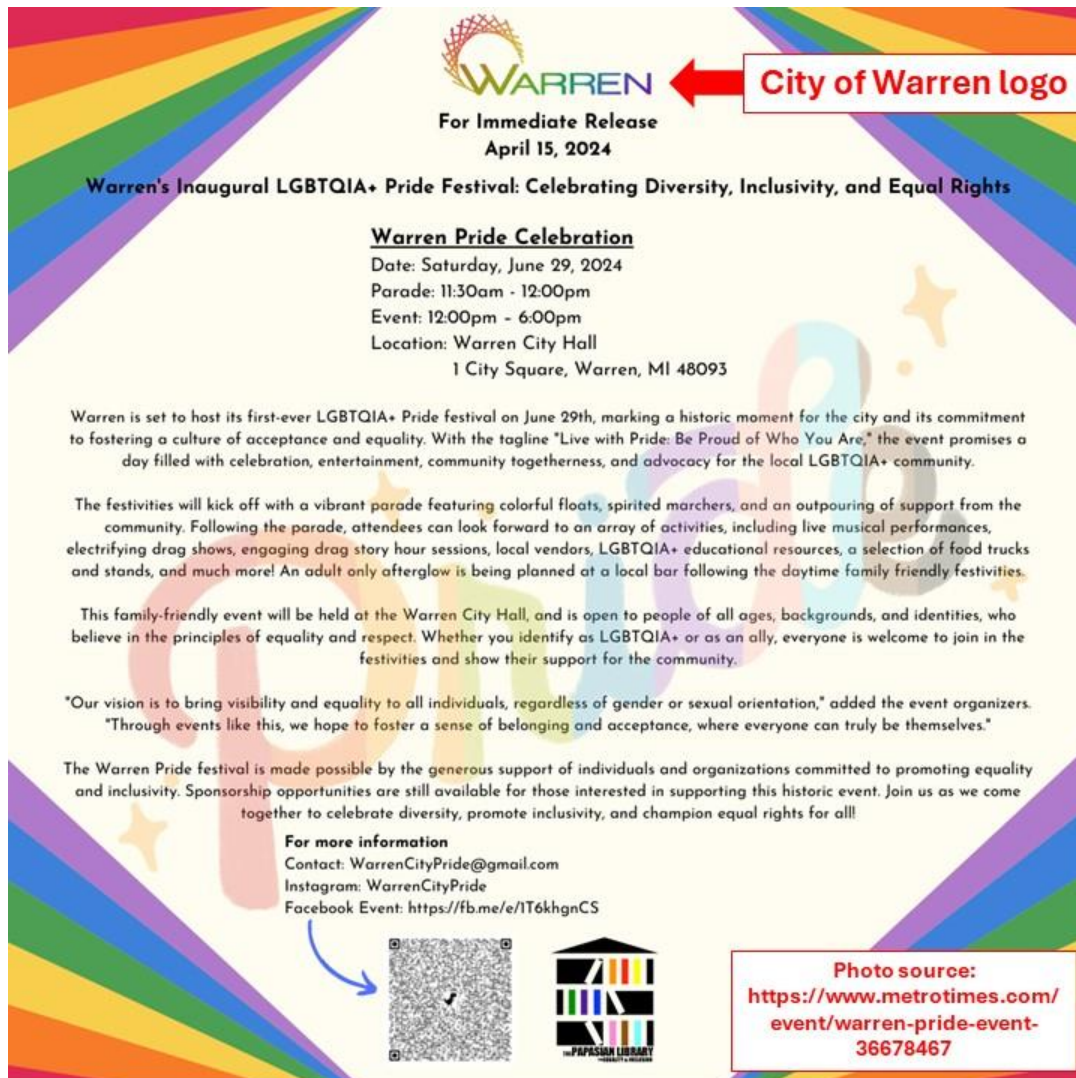
Former Mayor James R. Fouts' use of the State of the City Address to endorse candidates set a precedent for the misuse of official platforms for political purposes. Likewise, the Warren City Pride event featured political endorsements and promotional activities that included the active participation of political candidates. These candidates were visibly promoted alongside nonprofit messaging, creating an environment where political campaigning intertwined with the purported charitable goals of the event.

The presence of political figures and endorsements during the Warren City Pride event raises concerns about the ethical boundaries between nonprofit activities and political campaigns. Such activities not only risk violating Michigan's Campaign Finance Act, which prohibits the use of public resources for political campaigning, but also raise federal regulatory concerns regarding the IRS regulations governing 501(c)(3) organizations' political neutrality and tax-exempt status and related state statutes as well.

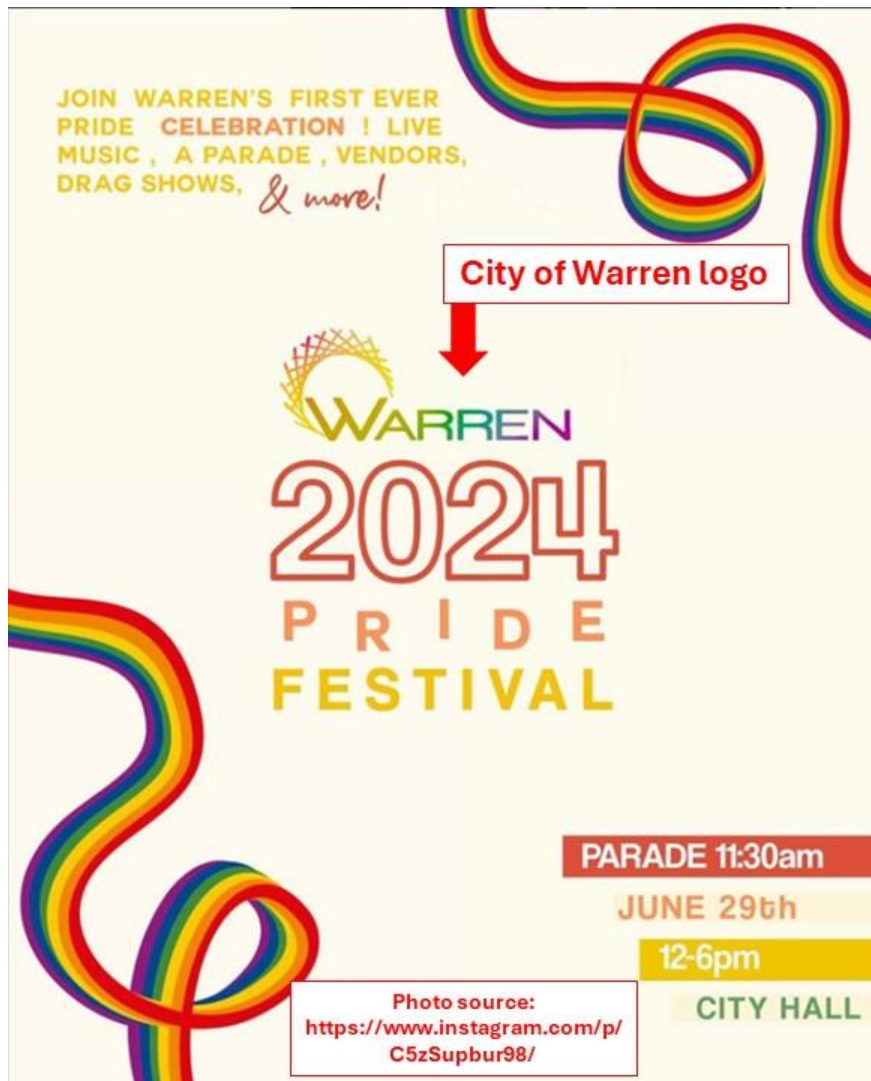
Moreover, the parallels between these instances highlight a recurring pattern of using public events and resources for partisan purposes, thereby undermining the impartiality and integrity of governmental and nonprofit institutions alike. The similarities underscore the need for thorough investigation and enforcement of laws governing the ethical conduct of public officials and nonprofit organizations, ensuring transparency, accountability, and adherence to regulatory standards.



Held at Warren City Hall, a property owned by the Warren Downtown Development Authority (*DDA*), and utilizing various city-owned facilities including the atrium, splash pad, and event stage, the event involved campaign activities associated with Christina Hines, Mike McFall and Lori Stone. These activities included the solicitation of donations and the presence of campaign materials, blurring the lines between city-sponsored activities and political campaigning. Such use of public resources for campaign-related purposes seemingly constitute a violation of Section 57 of the MCFA, which aims to prevent the improper influence of public resources in political campaigns, ensuring the impartiality and integrity of public office and resources.



The use of public body logos on fundraising materials implies unauthorized endorsement, constituting an expenditure of public resources under Section 57(1). Similarly, using city-maintained websites and social media platforms to promote fundraising materials involves the use of public resources like web hosting, maintenance, and administrative oversight. This use of public resources to assist the promotion and influence public support for the fundraiser is also considered an expenditure, violating Section 57(1).



The use of public body logos on fundraising materials implies unauthorized endorsement, constituting an expenditure of public resources under Section 57. Similarly, using city-maintained websites and social media platforms to promote fundraising materials involves the use of public resources like web hosting, maintenance, and administrative oversight. This use of public resources to assist the promotion and influence public support for the fundraiser is also considered an expenditure, violating Section 57.



WARREN CITY PRIDE

SATURDAY JUNE 29 2024

City of Warren Cultural Commission logo

1 City Square, Warren, MI 48093

11:30AM-12:00PM
PRIDE PARADE

12:00PM-6:00PM
FESTIVITIES AND ENTERTAINMENT

8:00PM-12:00AM
ADULT AFTERGLOW AT KUHNHENN BREWING
5919 Chicago Rd, Warren, MI 48092
• Food Trucks and Fun Times

Everyone is welcome to celebrate and support the LGBTQIA+ Community
Join us as we celebrate Warren's First LGBTQIA+ Pride with an all-day free family-friendly celebration

With Support From
CITY OF WARREN CULTURAL COMMISSION

Photo source:
<https://www.facebook.com/photo/?fbid=763113779341653&set=a.155379860115051>

HELP WARREN CITY PRIDE
Donations

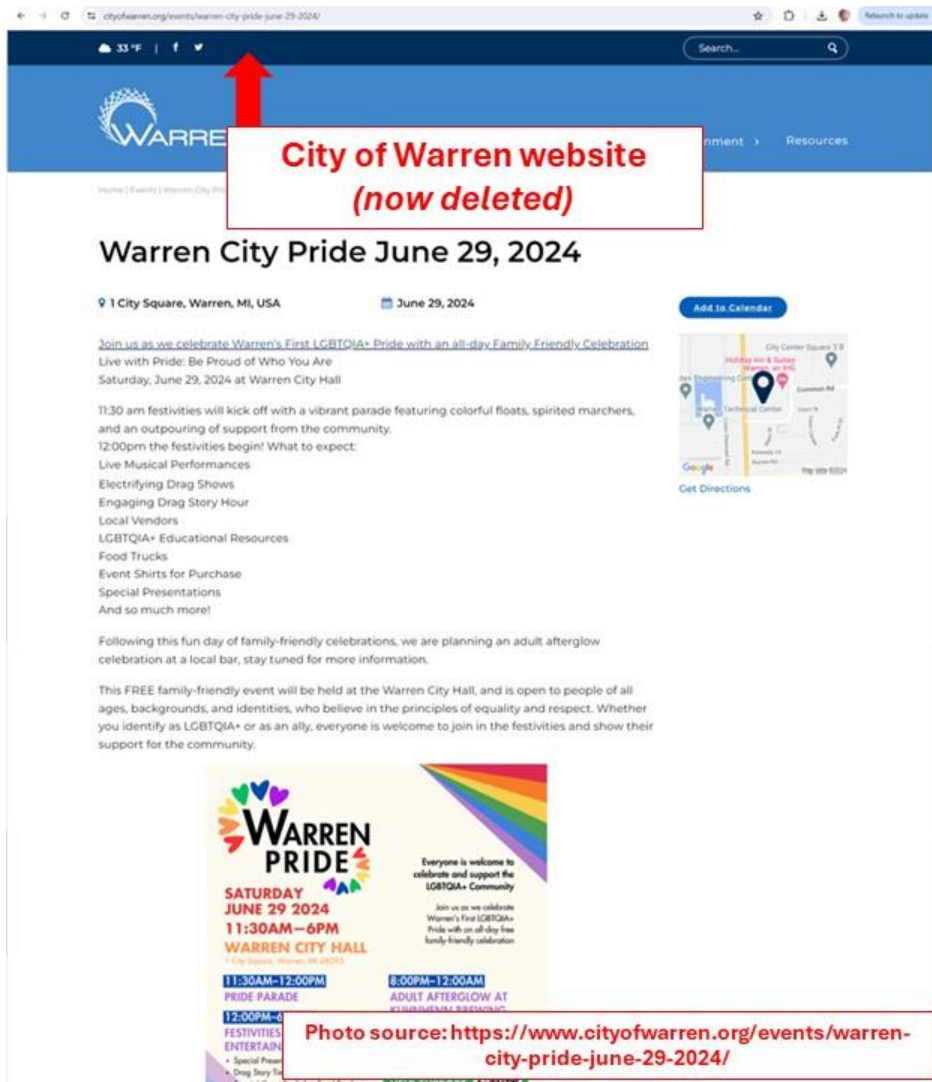
• Event Shirts • LGBTQIA+ Education
• Local Vendors and Resources

More info:   
@warrencitypride
warrencitypride@gmail
warrencitypride.com

SPECIAL GUEST
ATTORNEY GENERAL
DANA NESSEL

SPECIAL GUEST
TRANS DAY OF VISIBILITY
FOUNDER RACHEL
CRANDALL CROCKER

The use of public body logos on fundraising materials implies unauthorized endorsement, constituting an expenditure of public resources under Section 57. Similarly, using city-maintained websites and social media platforms to promote fundraising materials involves the use of public resources like web hosting, maintenance, and administrative oversight. This use of public resources to assist the promotion and influence public support for the fundraiser is also considered an expenditure, violating Section 57.



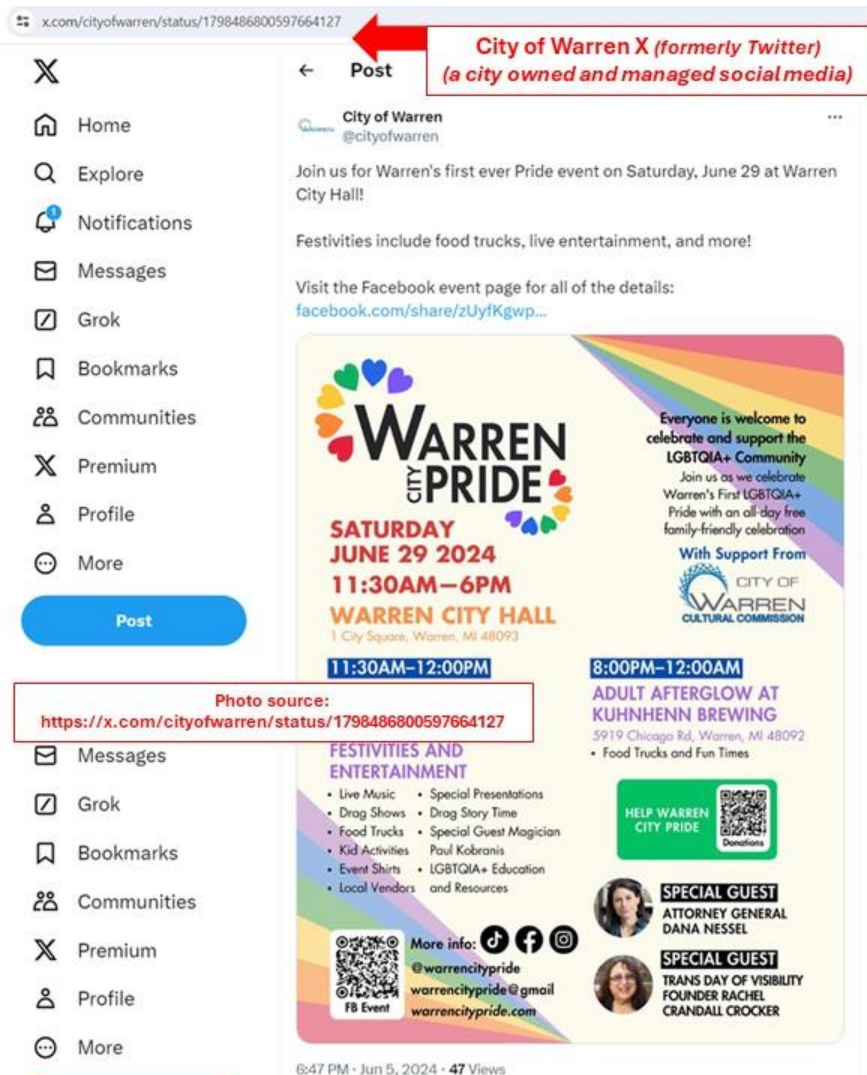
The use of public body logos on fundraising materials implies unauthorized endorsement, constituting an expenditure of public resources under Section 57. Similarly, using city-maintained websites and social media platforms to promote fundraising materials involves the use of public resources like web hosting, maintenance, and administrative oversight. This use of public resources to assist the promotion and influence public support for the fundraiser is also considered an expenditure, violating Section 57.



The use of public body logos on fundraising materials implies unauthorized endorsement, constituting an expenditure of public resources under Section 57. Similarly, using city-maintained websites and social media platforms to promote fundraising materials involves the use of public resources like web hosting, maintenance, and administrative oversight. This use of public resources to assist the promotion and influence public support for the fundraiser is also considered an expenditure, violating Section 57.



The event's promotional materials were also posted on the City's social media platforms. This includes the use of city personnel and resources to influence or assist the fundraiser, which falls under the definition of an expenditure under Section 57 of the MCFA. To determine the potential value of a social media post by the City promoting the fundraising event, the engagement metrics (*comments, reactions, and shares*) can be quantified, hours spent by the city employee managing the post, including creating, posting, and monitoring the engagement.



The event's promotional materials were also posted on the City's social media platforms. This includes the use of city personnel and resources to influence or assist the fundraiser, which falls under the definition of an expenditure under Section 57 of the MCFA. To determine the potential value of a social media post by the City promoting the fundraising event, the engagement metrics (*comments, reactions, and shares*) can be quantified, hours spent by the city employee managing the post, including creating, posting, and monitoring the engagement.



As part of our commitment to serving all people in Macomb County, look for us at community events like the upcoming Warren City Pride! We'll share Health Department resources and some fun giveaways.



When the Macomb County Health Department shares the City of Warren's Facebook post with the event flyer, it enhances the perception of the event being officially endorsed by the City. This action leverages public resources to amplify the message to a broader audience, increasing visibility and engagement. The shared post implies coordinated support and sponsorship between government bodies, blurring the lines between a city-endorsed event and an independent fundraising activity.



Statements and activities of public officials at public events are typically perceived as official endorsements or representations of government support, especially when done in an official capacity or mentioned in that context. Referring to it as "the city's" event implies an acknowledgment of the city's involvement, support, or recognition of the parade as a significant local milestone. Her statement leans towards associating the event more directly with the city of Warren itself rather than solely with the event organizer.



The account clearly identifies her as "Mayor Lori M. Stone," directly associates the account with her official role. Posting updates about the event from her official mayoral account, Stone gives the impression of official city endorsement. Such posts could influence public perception by suggesting that the city administration is actively engaged in and supportive of the Pride festival, blurring the line between personal endorsement and official city stance.



City Treasurer Lorie Barnwell

Lorie W. Barnwell
FROM THE TREASURER OF THE CITY:

No tax dollars are being used for this event! This is resident lead. No need to complain or be unkind.

4w Like Reply

Angelica Schneider
Lorie W. Barnwell thank you for always caring about the people who are spoken over, demonized for no reason, and discriminated against. You're such a wonderful person and you've done so many positive things for the city. Never stop! 🙌

4w Like Reply

Marcia Bohn
Lorie W. Barnwell Thanks for your support!!

4w Like Reply

Jeff Smits
Lorie W. Barnwell I have no problem with the event. I just don't want to pay for it. Have people donated actual money to the event to cover things like, electricity and water used during the event? Are people voluntarily helping set up for the event? Or are the parks and rec maintenance workers setting up and monitoring the event? Who's cleaning up after it? And are they being paid by people donating? Or are our tax dollars going to that as well? Do you see where I'm going with this?

Photo source:
<https://www.facebook.com/CityofWarren/posts/pfbid0vB3Y4zTiYRwZDwLuHuqFn2L3q74hGSBEj5uq7DFPhgNLVSpM1zdz1w5bUyZ8Rgdl>

Despite claiming no tax dollars are used, the Treasurer's involvement and the city's social media post imply that public resources, such as the Treasurer's time and the city's communication channels, are being utilized for the event. The Treasurer's statement might mislead the public into believing that the event is purely a resident-led initiative without any official endorsement or support, despite evidence suggesting city involvement and promotion.

Sec. 7.3 - Duties of the mayor.

Warren City Charter



Under the provisions of this charter, insofar as is required by law, and for all ceremonial purposes, the mayor shall be the administrative and executive head of this city. He shall be a conservator of the peace and may exercise within the city the powers conferred upon sheriffs to suppress disorder. He shall have authority to command the assistance of all able-bodied citizens to aid in the enforcement of the ordinances and regulations of the council, and the authority of the city government. The powers and duties of the mayor shall include the following duties and functions:

- (1) Keep an office in a convenient place to be provided by the council;
- ★ (2) See that all laws and ordinances are enforced within the city;
- (3) Except as in this charter otherwise provided, have power of appointment and removal over officers, departmental directors, and the members of commissions and boards;
- (4) See that all terms and conditions imposed in favor of the city or its inhabitants in any public utility franchise, or in any contract, are faithfully kept and performed;
- (5) Authenticate by his signature such instruments and proceedings as are required to be authenticated by him by law or by the council;
- (6) Prepare the annual budget proposal and present it to the council with an explanation thereof at the time and in the manner required by this charter;
- (7) Keep the council fully advised at all times as to the financial conditions and needs of the city;
- (8) On or before the first day of September in each year, prepare and submit to the council and the public, as of the end of the fiscal year, a complete report of the finances and administrative activities of the city during the prior fiscal year;
- (9) Recommend to the council for adoption such measures as he may deem necessary or expedient;
- ★ (10) Be responsible for the efficient administration of all departments of the city government;
- (11) Approve the administrative rules and regulations of the several directors, commissions, or boards in charge of the departments of the city government, before such rules and regulations shall be filed with the city clerk;
- (12) Require and receive monthly reports relative to the activities of each department from the respective department heads;
- (13) Act as and be the sole spokesman for the administrative service and officers of the city, except for the clerk, the treasurer, and the assessor insofar as their duties are provided by law;
- (14) Exercise and perform all administrative functions of the city which are not imposed by law or ordinance on some other city officer or agency;
- (15) Exercise such other powers and perform such other duties as may be prescribed by law, or as may be required of him by ordinance or by direction of the council;
- (16) Keep himself informed and report to the council, either of his own accord or in answer to questions put by the council, concerning the work of the several administrative officers and departments of the city and, to that end, secure from the officers and the heads of all administrative departments such information and periodic reports as may be required;
- (17) Perform all acts required by law, whether herein specifically provided for or not.

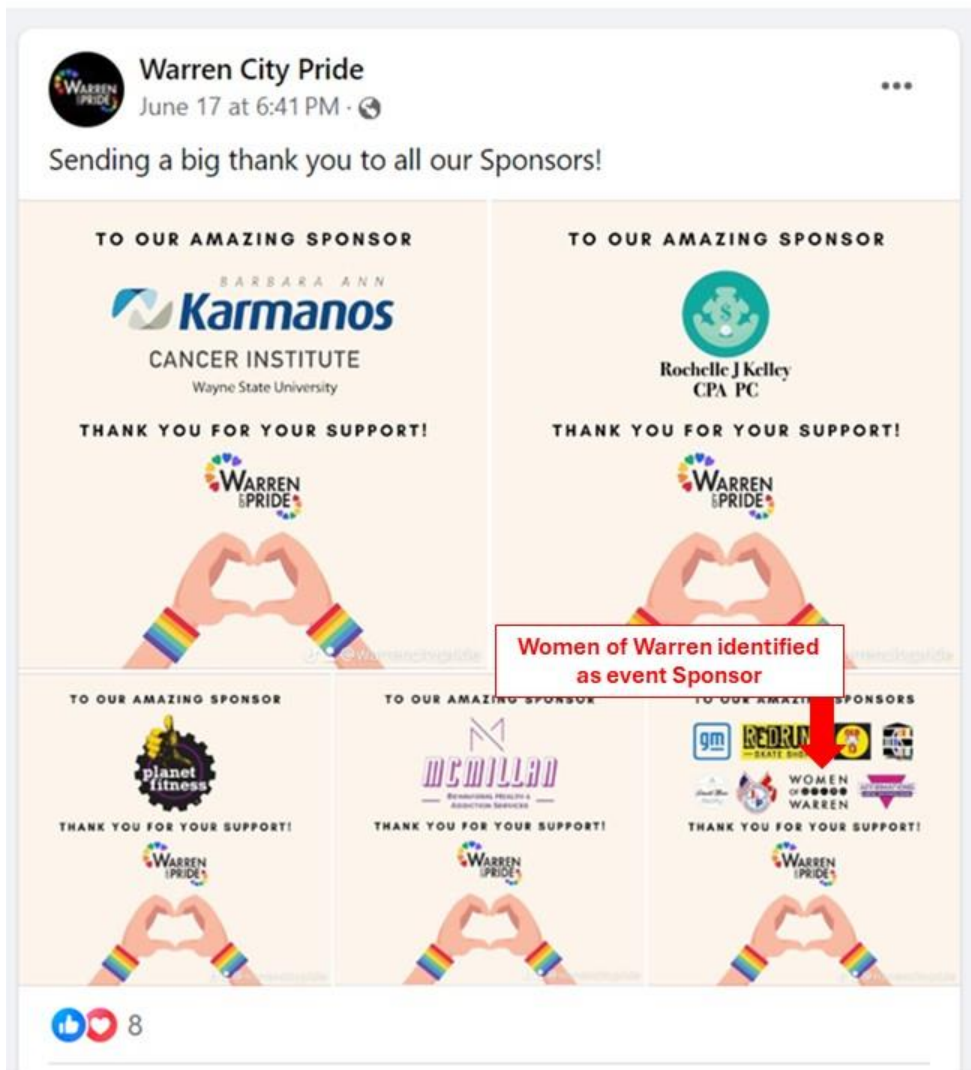
State Law reference—Mandatory that Charter provide for the qualifications and duties of its officers; MCL 111.01(9).

Photo source:
https://library.municode.com/mi/warren/codes/code_of_ordinances?nodeId=PTICH_CH7CIAD_S7.3DUMA

The duties outlined in Section 7.3 of the city charter emphasize the Mayor's pivotal role in ensuring the enforcement of laws and ordinances within the city. As the administrative and executive head, the Mayor is responsible for upholding all local regulations, including overseeing events and activities to ensure compliance with legal standards. Her inaction may suggest that she did not adequately oversee compliance due to her endorsement of McFall and Hines.



Event flyers promoting the event prominently feature city logos and references to "Warren City Pride," alongside a QR code which directs to donations for *The Papasian Library for Equality and Inclusion*. This setup blends city branding and usage of city property with charitable and campaign solicitation efforts. At least one candidate committee (*CTE Christina Hines*) associated with an event sponsor (*Women of Warren*) solicited donations that 501(c)(3) organization's vendor booth.



The presence of Women of Warren as a sponsor of the Warren City Pride event, where they had a booth with donation solicitation material for Christina Hines' campaign, raises concerns under Section 57 of the Michigan Campaign Finance Act (MCFA). This section prohibits the use of public resources for campaign purposes. Women of Warren, as a 501(c)(3) nonprofit, used their booth at a city-sponsored event (*Warren City Pride*) to solicit donations for Christina Hines' campaign. This action implies the use of public resources (*the event venue and associated resources*) to support a political candidate.



The presence of Women of Warren as a sponsor of the Warren City Pride event, where they had a booth with donation solicitation material for Christina Hines' campaign, raises concerns under Section 57 of the Michigan Campaign Finance Act (MCFA). This section prohibits the use of public resources for campaign purposes. Women of Warren, as a 501(c)(3) nonprofit, used their booth at a city-sponsored event (Warren City Pride) to solicit donations for Christina Hines' campaign. This action implies the use of public resources (*the event venue and associated resources*) to support a political candidate.



State Representative Mai Xiong is in Warren.

June 29 at 1:55 PM · 🌐

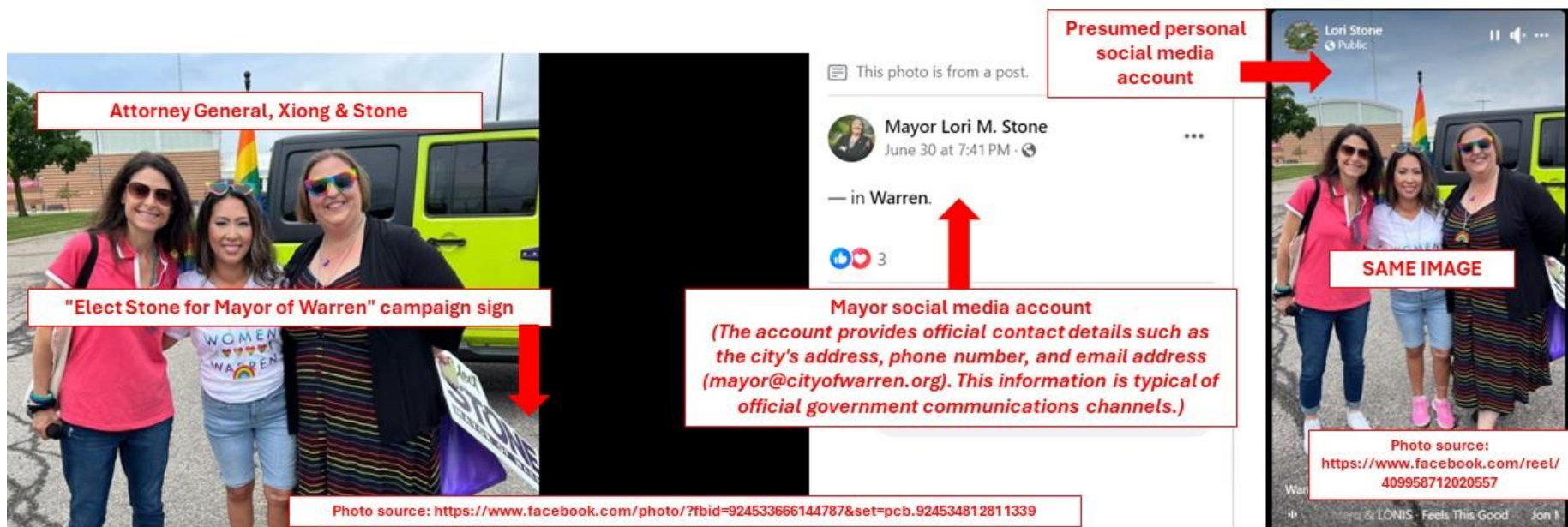
We had high energy and a great turnout at our first #PrideMonth celebration in Warren with Michigan Attorney General Dana Nessel and Mayor Lori M. Stone and the Women of Warren today!



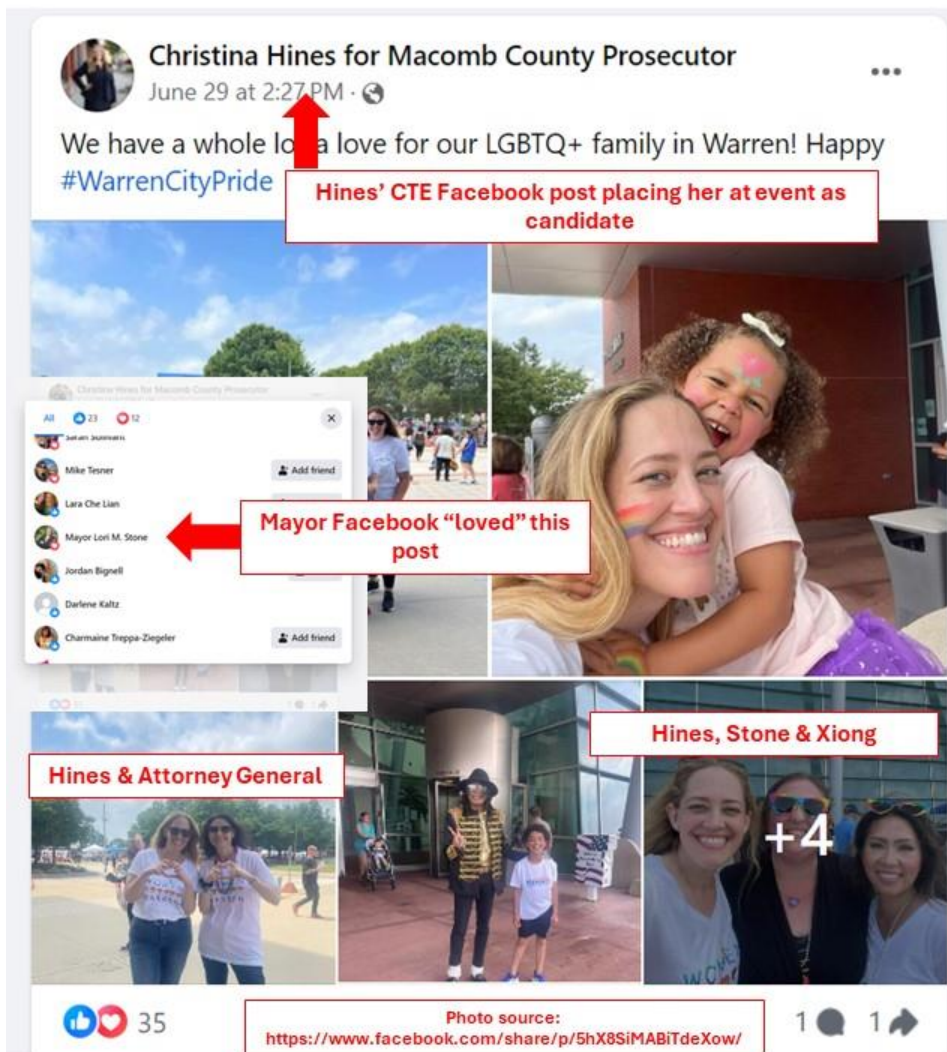
At the Warren City Pride event held at Warren City Hall on June 29th, Lori Stone, a candidate for Mayor of Warren in 2023, was photographed with Michigan Attorney General Nessel and State Rep. Mai Xiong with Stone holding an "Elect Stone for Mayor of Warren" campaign sign. This event utilized city-owned facilities and involved endorsements and campaign materials, which seemingly violates Section 57 of the Michigan Campaign Finance Act. This section prohibits the use of public resources for political campaign purposes, aiming to uphold the impartiality of public office and resources.



During the Warren City Pride event at Warren City Hall on June 29th, Lori Stone, acting in her capacity as both an approving authority for the event (*the Mayor*) and a candidate for Mayor of Warren (*despite her election being last year*), was photographed alongside Michigan Attorney General Nessel and State Rep. Mai Xiong, posing with an "Elect Stone for Mayor of Warren" campaign sign. This event, hosted on city-owned property, prominently featured campaign endorsements and materials. Such actions potentially contravene Section 57 of the Michigan Campaign Finance Act, which prohibits the use of public resources for political campaign purposes.



The same image featuring Lori Stone posing with campaign signage during the Warren City Pride event was also shared on the Mayor's official social media accounts and a "reel" posted on her page, presumed to be her personal Facebook account. This action further complicates the situation under Section 57 of the Michigan Campaign Finance Act, which prohibits the use of public resources—including official social media channels—for campaign purposes. By disseminating campaign-related content through official and personal social media platforms, Stone potentially blurred the lines between her official duties as Mayor and her candidacy, implicating public resources in her electoral campaign activities. Such use of public platforms for personal political gain seemingly constitute a violation of the Act's provisions.















In the context of Section 57 and the dual roles of Christina Hines, her presence at the event as both the President of Women of Warren and as a candidate for Macomb County Prosecutor raises concerns about potential violations. The Committee to Elect Christina Hines (CTE) Facebook post, featuring eight images from the event and liked by Mayor Lori Stone's official Facebook account, suggests a level of endorsement or support from the city for Hines' candidacy. This endorsement could blur the lines between a city-sanctioned event and a political campaign, representing misusing public resources for campaign purposes, which is prohibited under Section 57 of the Michigan Campaign Finance Act.

christinahinesformacomb.com/endorsements

Endorse Christina!

Photo source: <https://www.christinahinesformacomb.com/endorsements>

Elected Officials

 Attorney General Dana Nessel State of Michigan	 Wayne County Prosecutor Kym Worthy Detroit	 State Senator Stephanie Chang District 3	 State Senator Paul Wojno District 10
 State Senator Veronica Klinefelt District 11	 State Senator Kevin Hertel District 12	 State Representative Veronica Paiz District 11	 State Representative Kimberly Edwards District 12
 State Representative Mai Xiong District 13	 State Representative Donovan McKinney District 14	 State Representative Denise Menzter District 61	 Mayor Lori Stone Warren

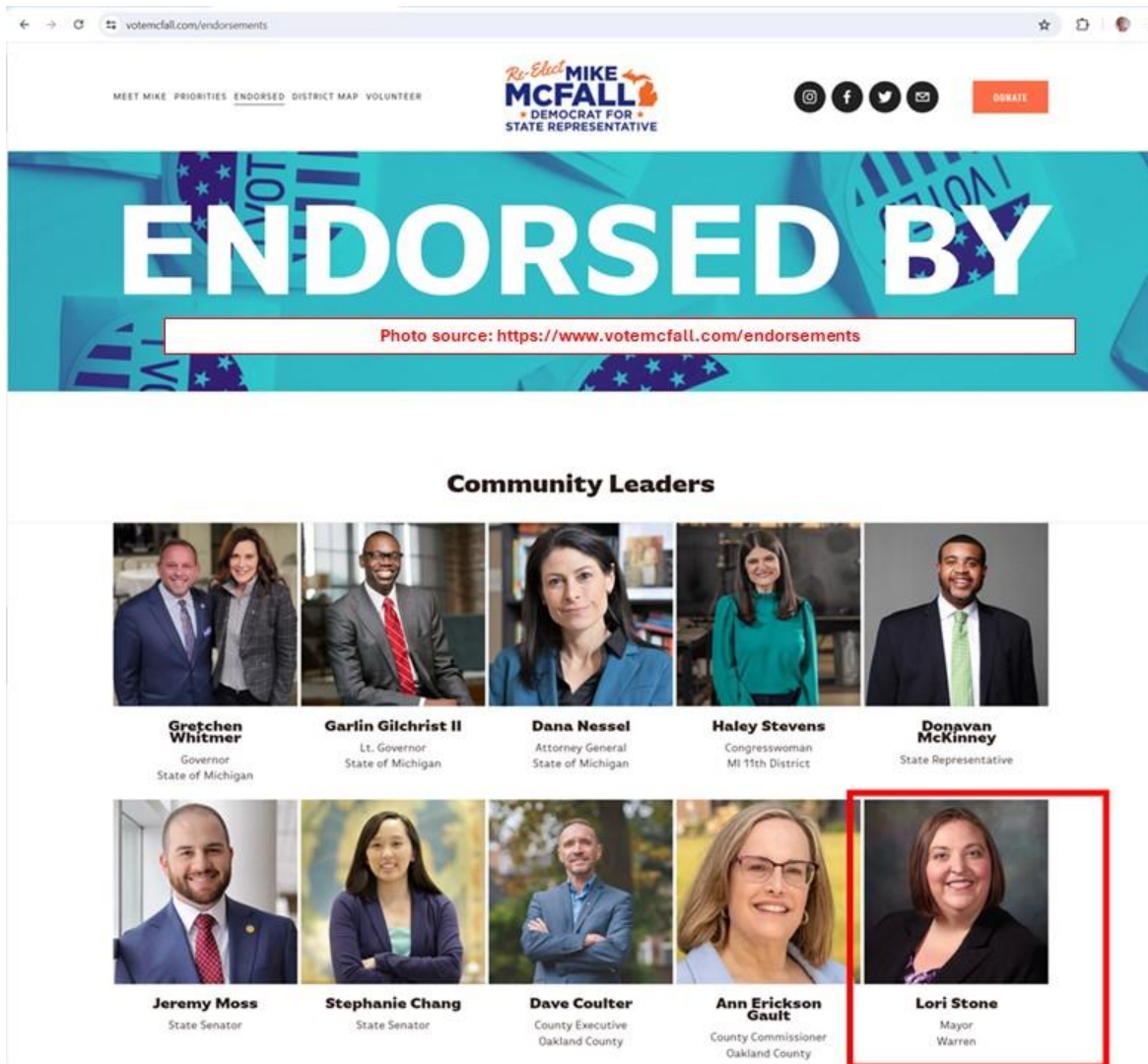
Stone's endorsement of Hines her campaign websites alone does not violate regulations. However, the active campaigning of these candidates at the Warren City Pride event implies a tacit approval or oversight by the City and Stone, who sanctioned and participated in the event. Stone's presence could be interpreted as endorsing the event's activities, including those involving campaign materials. This situation raises concerns about the event's management, suggesting a permissive attitude toward integrating campaign activities into a city-sponsored setting. Such actions conflict with the spirit of Section 57, designed to uphold the impartiality of public functions and prevent the misuse of public resources for partisan political purposes.



Mike McFall's presence at the Warren City Pride event, where he reportedly had a booth featuring campaign lawn signs and distributed campaign flyers and cards, raises concerns regarding compliance with Section 57 of the Michigan Campaign Finance Act. This section prohibits the use of public resources for campaign activities. McFall's booth, whether as a vendor or sponsor, displaying campaign materials like lawn signs and distributing campaign literature, suggests an intersection of public event participation with electoral campaigning. Mike McFall can be seen here with who is believed to be Warren City Councilman Henry "Hal" Newnan at his booth during the Warren City Pride event.



Stone, from her official mayoral Facebook account, also shares an image with McFall away from his booth, where he is seen wearing "McFall for State Rep" attire. This underscores McFall's presence at the Warren City Pride event. It also indicates Stone's awareness of McFall's participation in the event, potentially implying a recognition or endorsement of his campaign activities at the event.



Stone's endorsement of McFall on his campaign websites alone does not violate regulations. However, the active campaigning of these candidates at the Warren City Pride event implies a tacit approval or oversight by the City and Stone, who sanctioned and participated in the event. Stone's presence could be interpreted as endorsing the event's activities, including those involving campaign materials. This situation raises concerns about the event's management, suggesting a permissive attitude toward integrating campaign activities into a city-sponsored setting. Such actions conflict with the spirit of Section 57, designed to uphold the impartiality of public functions and prevent the misuse of public resources for partisan political purposes.

LARA Home Contact LARA Online Services News MI.gov

LARA Corporations Online Filing System

Department of Licensing and Regulatory Affairs

ID Number: 802952531 [Request certificate](#) [Return to Results](#) [New search](#)

Summary for: WOMEN OF WARREN

The name of the DOMESTIC NONPROFIT CORPORATION: WOMEN OF WARREN

Entity type: DOMESTIC NONPROFIT CORPORATION

Identification Number: 802952531

Date of Incorporation in Michigan: 12/05/2022

Purpose: Other

Term: Perpetual

Most Recent Annual Report: 2023 **Most Recent Annual Report with Officers & Directors:** 2023

The name and address of the Resident Agent:

Resident Agent Name: ROCHELLE J. KELLEY
 Street Address: 5685 ARDEN AVE
 Apt/Suite/Other:
 City: WARREN State: MI Zip Code: 48092-1149

Registered Office Mailing address:

P.O. Box or Street Address: 5685 ARDEN AVE
 Apt/Suite/Other:
 City: WARREN State: MI Zip Code: 48092-1149

The Officers and Directors of the Corporation:

Title	Name	Address
PRESIDENT	CHRISTINA MINES	4817 LA CHENE DR WARREN, MI 48092 USA
TREASURER	ROCHELLE J KELLEY	5685 ARDEN AVE WARREN, MI 48092-1149 USA
SECRETARY	MONICA BIHAR-NATZKE	11347 LOGINAW DR WARREN, MI 48089 USA
DIRECTOR	REBECCA ZAINOS	7019 HUPP WARREN, MI 48091 USA
DIRECTOR	TAYLOR JOHNSON	4829 LA CHENE DR WARREN, MI 48092 USA
DIRECTOR	SARAH MISTRETTA	5685 ARDEN AVE WARREN, MI 48092-1149 USA

Act Formed Under: 162-1982 Nonprofit Corporation Act

Acts Subject To: 162-1982 Nonprofit Corporation Act

The corporation is formed on a Membership basis.



Department of the Treasury
Internal Revenue Service
Tax Exempt and Government Entities
P.O. Box 2508
Cincinnati, OH 45201

WOMEN OF WARREN
5685 ARDEN AVE
WARREN, MI 48092-1149

Date: 01/25/2023
 Employer ID number: 88-4358554
 Person to contact: Name: Customer Service
 ID number: 31954
 Telephone: (877) 829-5500
 Accounting period ending: December 31
 Public charity status: 509(a)(2)
 Form 990 / 990-EZ / 990-N required: Yes
 Effective date of exemption: December 05, 2022
 Contribution deductibility: Yes
 Addendum applies: No
 DLN: 26053420002433

Dear Applicant:

We're pleased to tell you we determined you're exempt from federal income tax under Internal Revenue Code (IRC) Section 501(c)(3). Donors can deduct contributions they make to you under IRC Section 170. You're also qualified to receive tax deductible bequests, devises, transfers or gifts under Section 2055, 2106, or 2522. This letter could help resolve questions on your exempt status. Please keep it for your records.

Organizations exempt under IRC Section 501(c)(3) are further classified as either public charities or private foundations. We determined you're a public charity under the IRC Section listed at the top of this letter.

If we indicated at the top of this letter that you're required to file Form 990/990-EZ/990-N, our records show you're required to file an annual information return (Form 990 or Form 990-EZ) or electronic notice (Form 990-N, the e-Postcard). If you don't file a required return or notice for three consecutive years, your exempt status will be automatically revoked.

If we indicated at the top of this letter that an addendum applies, the enclosed addendum is an integral part of this letter.

For important information about your responsibilities as a tax-exempt organization, go to www.irs.gov/charities. Enter "4221-PC" in the search bar to view Publication 4221-PC, Compliance Guide for 501(c)(3) Public Charities, which describes your recordkeeping, reporting, and disclosure requirements.

Sincerely,

Stephen A. Martin

Stephen A. Martin
Director, Exempt Organizations
Rulings and Agreements

Letter 947 (Rev. 2-2020)
Catalog Number 35152P

LARA Home Contact LARA Online Services News MI.gov

LARA Corporations Online Filing System

Department of Licensing and Regulatory Affairs

ID Number: 802598342 [Request certificate](#) [Return to Results](#) [New search](#)

Summary for: THE PAPASIAN LIBRARY FOR EQUALITY AND INCLUSION

The name of the DOMESTIC NONPROFIT CORPORATION: THE PAPASIAN LIBRARY FOR EQUALITY AND INCLUSION

The name was changed from: THE PAPASIAN'S LITTLE FREE ANTI-RACIST LIBRARY FOR EQUALITY AND INCLUSION on 05-27-2021

Entity type: DOMESTIC NONPROFIT CORPORATION

Identification Number: 802598342

Date of Incorporation in Michigan: 02/09/2021

Purpose: Other

Term: Perpetual

Most Recent Annual Report: 2023 **Most Recent Annual Report with Officers & Directors:** 2023

The name and address of the Resident Agent:

Resident Agent Name: MONICA PAPASIAN
 Street Address: 6106 CHICAGO RD
 Apt/Suite/Other:
 City: WARREN State: MI Zip Code: 48092

Registered Office Mailing address:

P.O. Box or Street Address: 6106 CHICAGO ROAD
 Apt/Suite/Other:
 City: WARREN State: MI Zip Code: 48092

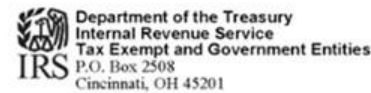
The Officers and Directors of the Corporation:

Title	Name	Address
PRESIDENT	MONICA PAPASIAN	6106 CHICAGO RD WARREN, MI 48092 USA
TREASURER	MONICA PAPASIAN	6106 CHICAGO RD WARREN, MI 48092 USA
SECRETARY	LOREN PAPASIAN	6106 CHICAGO ROAD WARREN, MI 48092 USA
DIRECTOR	LEANDA ANDERSON	51437 CAROLINE DR CHESTERFIELD, MI 48047 USA
DIRECTOR	MONICA PAPASIAN	6106 CHICAGO RD WARREN, MI 48092 USA
DIRECTOR	LOREN PAPASIAN	6106 CHICAGO ROAD WARREN, MI 48092 USA

Act Formed Under: 162-1982 Nonprofit Corporation Act

Acts Subject To: 162-1982 Nonprofit Corporation Act

The corporation is formed on a Directorship basis.



PAPASIAN LIBRARY FOR EQUALITY & INCLUSION
 6106 CHICAGO ROAD
 WARREN, MI 48092

Date: 11/22/2021
 Employer ID number: 86-1977554
 Person to contact: Name: Customer Service
 ID number: 31954
 Telephone: (877) 829-5500
 Accounting period ending: December 31
 Public charity status: 509(a)(2)
 Form 990 / 990-EZ / 990-N required: Yes
 Effective date of exemption: January 28, 2021
 Contribution deductibility: Yes
 Addendum applies: No
 DLN: 26053644002651

Dear Applicant:

We're pleased to tell you we determined you're exempt from federal income tax under Internal Revenue Code (IRC) Section 501(c)(3). Donors can deduct contributions they make to you under IRC Section 170. You're also qualified to receive tax deductible bequests, devises, transfers or gifts under Section 2055, 2106, or 2522. This letter could help resolve questions on your exempt status. Please keep it for your records.

Organizations exempt under IRC Section 501(c)(3) are further classified as either public charities or private foundations. We determined you're a public charity under the IRC Section listed at the top of this letter.

If we indicated at the top of this letter that you're required to file Form 990/990-EZ/990-N, our records show you're required to file an annual information return (Form 990 or Form 990-EZ) or electronic notice (Form 990-N, the e-Postcard). If you don't file a required return or notice for three consecutive years, your exempt status will be automatically revoked.

If we indicated at the top of this letter that an addendum applies, the enclosed addendum is an integral part of this letter.

For important information about your responsibilities as a tax-exempt organization, go to www.irs.gov/charities. Enter "4221-PC" in the search bar to view Publication 4221-PC, Compliance Guide for 501(c)(3) Public Charities, which describes your recordkeeping, reporting, and disclosure requirements.

Sincerely,

Stephen A. Martin

Stephen A. Martin
 Director, Exempt Organizations
 Rulings and Agreements

Letter 947 (Rev. 2-2020)
 Catalog Number 35152P

← → ↻ macomb.mi.campaignfinance.us/iCommitteePortal.php?iC

Community
Government

View Campaign Statements Return to Search Results

Committee Details	
Committee ID:	140265
Committee Name:	CTE LORI STONE MAYOR
Committee Type:	CANDIDATE
Formation Date:	01/03/2023
Has Waiver:	No
Candidate:	STONE, LORI M
Office:	MAYOR
Jurisdiction:	WARREN
Political Party:	NON PARTISAN
Committee Address:	27582 EVELYN WARREN, MI 48093
Telephone:	(586) 764-4317
Mailing Address:	P.O. BOX 1435 WARREN, MI 48090
Treasurer:	STONE, LORI M 27582 EVELYN WARREN, MI 48093
Telephone:	(586) 764-4317

Campaign Finance Reporting © 2004-2024 [Campaign Finance](#)

← → ↻ macomb.mi.campaignfinance.us/iCommitteePortal.php?iC

Community
Government

View Campaign Statements Return to Search Results

Committee Details	
Committee ID:	140291
Committee Name:	CTE CHRISTINA HINES
Committee Type:	CANDIDATE
Formation Date:	04/21/2023
Has Waiver:	No
Candidate:	HINES, CHRISTINA
Office:	PROSECUTING ATTORNEY
Jurisdiction:	MACOMB COUNTY
Political Party:	DEMOCRATIC
Committee Address:	4817 LA CHENE DRIVE WARREN, MI 48092
Telephone:	(586) 298-2589
Mailing Address:	P O BOX 1251 WARREN, MI 48090
Treasurer:	JOHNSON, KYLE 4829 LA CHENE DRIVE WARREN, MI 48092
Telephone:	(317) 416-8316
Designated Recordkeeper:	WEST, TARA 857 CLIFFORD AVENUE SE GRAND RAPIDS, MI 49546
Telephone:	(616) 915-8438

Campaign Finance Reporting © 2004-2024 [Campaign Finance](#)

Michigan Committee Statement of Organization

The documents sent and received listing for this committee is at the bottom of the screen.


[Jump to the documents on file](#)

Committee ID#	520272
Type of Filing	Original
Full name of committee	FRIENDS OF MIKE MCFALL
Committee Type	Candidate
Candidate Last Name First Name MI	MCFALL MIKE
County of Residence	OAKLAND
Political Party	Democratic Party
Office Sought	Representative in State Legislature 14th District
Date Committee Was Formed	01/05/2022
Committee Phone Number	(248) 321-5553
Committee Mail Address	PO BOX 911 HAZEL PARK, MI 48030
Committee Street Address	1405 E MADGE AVE HAZEL PARK, MI 48030
Treasurer	MIKE CARL MCFALL 1405 E MADGE AVE HAZEL PARK, MI 48030 (248) 321-5553
Designated Record Keeper	
Reporting Waiver	No

SUBSCRIBER ONLY

Warren Pride event raises concerns for some

Complaints lodged over sex-themed vendors, politicians

 A complaint has been filed with the Warren Police Department regarding vendors selling sexually explicit items at Warren Pride, which was advertised as a family friendly, city supported event. (SUBMITTED PHOTO)

A complaint has been filed with the Warren Police Department regarding vendors selling sexually explicit items at Warren Pride, which was advertised as a family friendly, city supported event. (SUBMITTED PHOTO)



By **SUSAN SMILEY** | ssmiley@medianewsgroup.com | Macomb Daily

PUBLISHED: July 8, 2024 at 2:08 p.m. | UPDATED: July 8, 2024 at 10:33 p.m.

Billed as a family-friendly event, some say Warren's first ever Pride event June 29 was anything but that.

Vendors from Nice & Naughty and Erotic Toy Chest had sexually explicit items for sale in booths that were not enclosed or located in a separate 18-and-over area. Items in the booths could be seen by anyone walking by including children who were playing at the city splash pad or who were participating in face painting or other kid-friendly festival activities.

Resident Paul Kardasz has filed a report with the Warren Police Department regarding the proximity of sexually explicit materials to children as well as a formal ethics complaint with the city regarding tables containing sexually-themed items. He also alleges campaign violations by two candidates who were handing out campaign literature including lawn signs and asking for campaign donations at the event. The complaint also alleges misuse of public resources by Mayor Lori Stone and violation of ethical standards.

The City of Warren has a code of ordinances pertaining to sexually oriented businesses including sexual device shops and Macomb County Prosecutor Peter Lucido believes the presence of the two vendors are a violation of those ordinances.

Lucido said he was made aware of the sexually explicit materials being on display at the Warren Pride festival and is aware a resident has filed a complaint with the Warren Police Department. The matter has not yet come to his office and Lucido said depending on what the investigation reveals, Warren's city attorney could have jurisdiction or the case could merit involvement by federal authorities.

"You had the chief law enforcement official in the State of Michigan there and If there was anyone there who was in law enforcement, including prosecutors, I don't understand why they didn't stand up and say this is a no-no," Lucido said. "Who allowed this to happen and who was there to protect the children?"

Lucido questioned who vetted the vendors and who was in charge of ensuring all were following protocol during the event. Allegations of campaign violations, he said, should be filed with the Secretary of State.

Democratic State Rep. Mike McFall, who is running for re-election, had a vendor table at the event where he was distributing campaign literature and lawn signs. McFall said he was invited to apply for a booth by the Warren Pride organizers and was told it was a private, non city-sponsored event.

“Because it was a private event, my team did not violate any campaign rules,” McFall said.

A Women of Warren vendor table displayed a sign promoting Macomb County Prosecutor candidate Christina Hines which included a QR code linked to a page for donations to her campaign. According to her campaign website, Hines is the president of the Women of Warren non-profit.

Hines did not immediately respond to a request for comment.

“It was disturbing to me that Mr. McFall was campaigning and passing out campaign flyers and signs on city property which is a violation of both city rules and Michigan campaign laws,” said James Fouts, Warren former mayor and McFall’s opponent in the 14th District State House race. “Sex toys on display should have been prohibited; this would be unacceptable to most people and a serious violation of the public trust.”

Promotional materials for Warren Pride bore the City of Warren official logo and stated the event was supported by the city’s cultural commission. A post by the City of Warren on its Facebook page invited residents to “join us for Warren’s first-ever Pride event.”

An inquiry to Stone, who attended the event, regarding the ethics complaint was answered with a statement from Communications Director Clarissa Cayton saying that the Pride event was not city sponsored and that it was a “grassroots organized event.” She directed any further questions to “event organizers.”

Cayton did not respond to questions asking for clarification as to why the city logo was used on promotional materials for a non-city supported event or why the Warren Pride event was listed on the city’s website if it was not a municipally-sponsored event.

Cultural Commission member Monica Papasian, who was also one of the Warren Pride organizers, said the city’s cultural commission helped with event set-up, but did not give any money toward its planning. She contends that her non-profit, The Papasian Library for Equity and Inclusion, sponsored the Warren Pride event even though that non-profit was not named on any of the promotional materials for the event.

"We were a non-profit just looking to put on a community event," Papasian said. "The city supported us, but did not give us any money."

When asked what the group was charged for rental of the City Hall atrium and use of the area in front of City Hall, Papasian said the city did not charge them for use of either space.

In May, a community group held a National Day of Prayer event on the sidewalk area in front of City Hall and was charged \$850 for rental of that space.

Papasian said that this first-time event grew to be much larger than she and the other organizers anticipated and they realized too late that they did not have enough volunteers to ensure vendor guidelines were being followed.

"We were going to have an 18-and-over section, but we did not think we would have that many vendors where it would be necessary," said Papasian. "One vendor had a large sign up saying it was an 18-and-over booth and followed our rules that there was supposed to be nothing visible to children.

"Unfortunately, two vendors did not follow instructions and put items out on display that were not approved."

She said a volunteer was assigned to monitor the 50-plus vendor booths and that person told her during the event there were no issues. She said planning for next year's event has already begun and that the issue of adult vendors is on the planning committee's "action sheet" as an item that needs to be addressed.

With regard to people actively campaigning, Papasian said she was not aware that it was a violation of any campaign finance law.

Warren Councilman and Mayor Pro Tem David Dwyer said he received calls from several residents on Saturday, many who were using the splash pad in front of Warren City Hall and said they were concerned about the proximity of the booths with sexually explicit items to an area where children were playing.

Dwyer said event approval never came before the City Council, although it was advertised on the city website, and that he is asking questions about the procedure that was used to vet vendors.

"I'm not happy that this did not go through us," said Dwyer. "If you want to make it a family friendly event, then let's do just that.

"I would like to know their process in allowing these vendors to be there in the first place because we were out of the loop as Council."

Dwyer said that he is also looking into allegations of campaign violations that allegedly took place during the festival. Discussion about the ethics complaint is scheduled for the July 9 Warren City Council meeting.

"It is a shame everyone has to be so bent out of shape when we were making such an effort," said Papasian. "We are trying to do something to make the city more inclusive but no matter what you do, someone is going to have a problem with it."



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

July 22, 2024

City of Warren & Mayor Lori Stone
One City Square
Warren, MI 48093

Re: *Kardasz v. City of Warren et al.*
Campaign Finance Complaint No. 24-068

Dear City of Warren & Mayor Stone:

The Department of State (Department) has received a formal complaint filed against you by Paul M. Kardasz alleging that you violated the Michigan Campaign Finance Act (MCFA or Act). Specifically, the complaint alleges that the City of Warren and Mayor Stone improperly used public resources by allowing city resources to be used for campaign purposes and endorsing candidates on official social media pages. 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 complaint also alleges Section 57 violations by Monica Papasian, Christina Hines, and Mike McFall. These individuals are not public employees of the City of Warren and have no control over the use of city resources. Therefore, they cannot violate section 57 of MCFA because they cannot direct the use of public resources. The complaint as it pertains to those candidates is therefore dismissed without prejudice.

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 Paul M. Kardasz, 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 Section
Bureau of Elections
Michigan Department of State

Enclosure
c: Paul M. Kardasz



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

August 28, 2024

SECOND NOTICE

City of Warren & Mayor Lori Stone
One City Square
Warren, MI 48093

Re: *Kardasz v. City of Warren et al*
Campaign Finance Complaint No. 24-068

Dear City of Warren & Mayor Lori Stone:

The Department of State (Department) has received a formal complaint filed against you by Paul M. Kardasz alleging that you violated the Michigan Campaign Finance Act (MCFA or Act). Specifically, the complaint alleges that the City of Warren and Mayor Stone improperly used public resources by allowing city resources to be used for campaign purposes and endorsing candidates on official social media pages. A copy of the complaint is included with this notice.

The Department sent you notice of this complaint on July 22, 2024. That letter informed you that you had 15 business days from that date to provide a response to the complaint. **As a courtesy, the Department is extending you an opportunity to submit a response within 15 business days of the date of this second notice.** If you do not submit a response within 15 business days of the date of this notice, the Department will have no choice but to adjudicate the complaint based on the facts and allegations included in the complaint alone.

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 Paul M. Kardasz, 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 Section
Bureau of Elections
Michigan Department of State

Enclosure
c: Paul M. Kardasz



CITY ATTORNEY'S OFFICE

ONE CITY SQUARE, SUITE 400

WARREN, MI 48093-5285

(586) 574-4671

FAX (586) 574-4530

www.cityofwarren.org

September 3, 2024

Michigan Bureau of Elections
Regulatory Section
Richard H. Austin Building
First Floor
430 W. Allegan
Lansing, Michigan 48918

ER: *Kardasz v. City of Warren, et al*
Campaign Finance Complaint No. 24-068

To Whom it May Concern:

In correspondence dated July 22, 2024, the Department notified the City of Warren and Mayor Lori M. Stone of the above-noted complaint. On behalf of the City of Warren and Mayor Lori M. Stone, we respectfully respond to the complaint as follows:

1. The complaint is predicated upon activities expressly allowed under the Michigan Campaign Finance Act (MCFA), MCL 169.201, et. seq., specifically, MCL 269.257 (1)

The complaint arises from activities associated with the Warren Pride Festival, a community event to celebrate the LGBTQIA community and inclusivity within the City of Warren. It was planned and sponsored by the Papasian Library for Equality and Inclusion, a Michigan non-profit organization and 509 (a)(2) public charity "Library for Inclusion" and Woman for Warren, a Michigan non-profit organization and 509 (a)(2) public charity. The event was supported by the City of Warren as a community event of cultural and recreational value, supplying the atrium and atrium set up for children's activities, and minor in-kind advice, assistance locating food trucks, and an overnight holding area for Library for Inclusion tables. Library for Inclusion submitted an application to rent the public space at the event. See Attachment 1. The event was held on the grounds of City Square Park, a Warren public park (Attachment 6). Library for Inclusion independently organized and managed the event and made the arrangements for vendors on the site. The organization had vendors fill out vendor forms and required a vendor fee. The City was not involved with the vendor permits or the fee. All proceeds from the vendor fees solely benefited Library for Inclusion, which reportedly would defray events costs and help fund a future Pride fair.

The festival was held on Saturday, June 29, 2024, and attended by several public officials, including Michigan Attorney General Dana Nessel, State Senator Stephanie Chang, State Representative Mai Xiong and Mayor Lori M. Stone. It was also attended by local council members. Each public official attended the event on personal time, and expended personal funds for costs, if any, associated with his or her participation at the event. MCL 169.257((1)(f).

The event was also attended by several candidates for public office, including State Representative Mike McFall, Candidate for Macomb Prosecutor Christina Hines, as well as State Representative Mia Xiong, and Candidate for Macomb County Commission Lisa Wojno.

At issue, State Rep. Mike McFall had set up a campaign booth at the site, with permission of Library for Inclusion. His table and chairs were set up and paid for by himself or Library for Inclusion. He did not bring any campaign materials inside a public building. His tables and chairs were set or paid for solely by them or Library for Inclusion. Mayor Stone did not have prior knowledge of his booth and had no involvement in the process for the booth being on the site. Based upon inquiries, no officer or City administrator or employee had prior knowledge that the booth would be set up at the event. More importantly, the City of Warren did not expend any public resources for any candidate or campaign booth. The City of Warren did not set up any chairs or tables. Specifically, the City of Warren Parks and Recreation Director who helped the organizers with event logistics and atrium set-up had no prior knowledge of his campaign booth.

Contrary to allegations, Christina Hines did not set up a booth for her campaign. Instead Women of Warren, a private non-profit organization, had a booth. The Women for Warren booth contained materials to promote membership in the organization. Without her prior knowledge or consent, another person outside of her campaign committee placed her campaign flyer in the booth, against her instructions and wishes. As soon as she learned the sign was on the site, she immediately had it removed.

Other candidates appeared at the event without prior knowledge of, or invitation from, any of the event planners. County Commissioner Candidate Lisa Wojno appeared with her campaign shirt without prior invitation. State Representative candidate Mia Xiong also appeared at the event.

This event was equally available to all candidates to appear with or without campaign materials. The Warren Pride event was widely publicized, and openly endorsed by the Warren City Council at a public meeting. An event promotional flyer is attached as Attachment 2, and the Warren City Council resolution is attached as Attachment 3. Other candidates would have known about the event, and had the opportunity to appear. No political candidates were excluded from this event. The event was privately managed, and the City did not exercise control over the event. Library for Inclusion adopted the policy that all candidates would have access to a booth. Other candidates also had equal access to the grounds, from both the policy of the private sponsor, and the City of Warren. The property is designated as a public park, and it was open to the community for a public event, without a governmental permitting process in place at the time. All candidates had the equal opportunity to appear on the grounds during the festival.

There is simply no nexus between the City of Warren or Mayor Stone and the reported campaign activity. This was privately sponsored, with only in-kind support from the City of Warren, confined solely to the public interest in recreational activity and inclusivity within the community. No City resources were used to assist with the election of a candidate. The City did not control the festival operations or the grounds. The City of Warren's in-kind support was to provide electricity for the stage area, access to public bathrooms, and offer logistical guidance on emergency vehicle access and parade routing and community promotion. The event is of cultural, community-wide value, the City helped with its promotion. The third-party sponsor managed the vendors and the event planning.

Likewise, Mayor Stone attended the event on her personal time. There is no correlation between her attendance at the event and the candidates. Mayor Stone did not have direct or indirect involvement in the participation of the candidates. No evidence supports such a conclusion. Mayor Lori Stone, in her personal capacity supports certain candidates. She restricts such support to her personal time and on her personal social media account. She never contributed nor made an expenditure of public resources to endorse any candidate at the Pride Festival.

Although the president of the Library for Inclusion is a member of the Warren Cultural Commission, it is also not relevant. All event organizers acted in private capacity, and did not use the booths to endorse any candidate. The organization adopted the policy that no candidate would be excluded from purchasing a booth. The Warren Cultural Commission as a body supported the event, but had no involvement with the vendors. The involvement of a member on her private time in a private capacity does not implicate the City of Warren.

For reasons further elaborated below, no factual basis supports the allegations of a Campaign Finance Act violation.

2. The materials submitted with the complaint have been mischaracterized, and when explained or viewed in accurate context, they fail to demonstrate that public resources were used to promote a candidate

The materials submitted with the complaint include commentaries which are inaccurate and misleading. For ease of explanation, each document is addressed and refuted individually, as follows:

Doc. 1, (Complaint) page 16: The photo is of the grounds in which the complainant misrepresented that Christina Hines had a campaign booth. The booth belonged to Women for Warren, of which Ms. Hines is president. The booth was to promote membership in Women of Warren. Ms. Hines expressly did not want her campaign materials in the booth. When she was on the grounds of the event, her husband told her a campaign flyer was in the booth. She immediately had it removed. The flyer was not on site for the duration of the event. The flyer was there without Ms. Hines permission or knowledge, and was contrary to her explicit instructions to the person setting up the booth. If the flyer was without Ms. Hines permission, no culpability may be imputed to Mayor Stone or anyone else associated from the City.

Complainant's pointer on the photo is not to a campaign booth of Christina Hines, and if anything, would be directed to the booth set up by and for Women of Warren, a non-profit organization which she organized. See the Michigan Department of Licensing and Regulatory Affairs (LARA) report regarding the entity's formation attached as Attachment 4.

Doc. 2, page 17: This image correctly depicts event promotional flyer but the commentary about the flyer is false. The City helped to promote the event, although its private sponsors were the Library for Inclusion and the Women of Warren. The scan code at the bottom is not for any private candidate. It is for the Library for Inclusion for the Pride Event. The Warren Pride Festival was the first of its kind in the City of Warren, and a new template was created to produce the event. The scan code was to invite private sponsorship for the event costs. Donations would not be allocated to any public account, nor be diverted to any candidate or for any assistance to a public candidate. It is independent of the City of Warren.

Doc. 3, page 18: The image is from the City of Warren Cultural Commission social media account. No candidate is endorsed. The city logo was properly depicted in a promotional material for a community public event, supported, in-kind, by the City.

Doc. 4, page 19: This image captured from the Warren Cultural Commission social media account, promotes the Pride Event, and is a proper use of public resources. The event had cultural significance and was properly promoted on a public resource. The depiction of Attorney General Nessel is irrelevant. She was an event participant and her image helped to promote the event. She is not currently running for office.

Doc. 5, page 20: Again, a public social media account was used to promote a community event. No MCFA violation. The post does not refer to any candidate.

Doc. 6, page 21. The image demonstrates a public social media account used for community promotions. No reference to a candidate or fundraising appears.

Doc. 7, page 22. Public social media account used for community event promotion. There is no reference to a candidate or fundraising. No MCFA violation.

Doc. 8, page 23: Irrelevant. This social media post solely promotes the event and does not include any reference of a candidate.

Doc. 9, page 24: This image is a post from the Macomb County Health Department not the City of Warren. It demonstrates the wide-range popularity and support for the event, without any reference to assist the election of a candidate

Doc. 10, page 25: The image is a post from Attorney General' Nessel's social media account. She depicts civic leaders in their capacity as elected officials participating in the event and not as candidates.

Doc 11, page 26. Pursuant to City Charter, section 7.3, the mayor of the City of Warren is the spokesperson for the City, who acted within her authority to promote a community event. She makes no reference to a campaign or candidate. The charter section is attached as Attachment 5.

Doc. 12, page 27: The posts from the City Treasurer's social media account do not contain any reference to a campaign or candidate.

Doc. 13, page 28: The excerpt from the Warren City Charter is accurate. Yet, there is no correlation between City Charter and a MCFA violation. Contrary to complainant's allegations, constitutional considerations are at issue. The event was held on grounds commonly known as City Square Park, which is legally owned by the City of Warren Downtown Development Authority and designated as a public park. See Attachment 6. A mayor does not have unfettered discretion to remove a candidate from a park at an open public event. Even if the festival were managed and sponsored solely by the City of Warren, the eviction of a candidate at an open public event must adhere to constitutional standards.

Doc 14, page 29: The only flyer of concern is from Christina Hines, which was inside the Woman of Warren booth along with Women of Warren materials. The flyer was placed in the booth without Ms. Hines permission or prior knowledge. She had it removed immediately learning that it had been placed in the booth. The scan code was a normal part of her flyer, and no one used it to directly solicit donations. Ms. Hines did not actively or affirmatively solicit donations among the patrons, and previously expressed to event planners that she did not want her campaign materials at the Event. It was placed against her wishes and without permission. At issue, no person from the City, including Mayor Stone, had any association or involvement with the flyer being in the booth. Since it was there without Ms. Hines knowledge, it is implausible to associate the City of Warren with the flyer.

Doc 15, page 30: The Women of Warren promoted the event. Its expression of appreciation for event sponsors does not impute liability to the City of Warren or Mayor Stone. The complainant's comments misstate the extent of Ms. Hine's involvement at the event. She only set up a booth for Women of Warren, and not for or by her Committee to Elect. The flyer in the booth was a minor aspect of the booth content, and, again, was there without consent of Ms. Hines

Doc. 16, page 31. The flyer was not on open grounds but inside a booth were in a booth – no direct solicitation was made on site, and the flyer was not in direct site of event patrons unless they visited the booth. It was not openly displayed, and situated among materials for Women of Warren.

Doc. 17, page 32: The complainant's commentary is not consistent with the image. The image does not depict any campaign materials. The photo is simply public officials attending and supporting an event to celebrate the LGBTQ community. State Representative Mia Xiong did not post the photos on her campaign account, and no images appear of a political campaign sign. Women of Warren, is a Michigan non-profit organization, not a political organization. See LARA print-out, as Attachment 7.

Doc. 18, page 33: The photo includes a sign to identify Mayor Lori Stone, She had the word "elect" cut from the sign, so it would not visibly appear. However, the back of the sign included "elect", which could not be cut without cutting her name. Therefore, she held the sign during the event only the front appeared with her name and not the word "elect". It was converted to an identification sign, and displayed during without the word "elect" appearing. Due to her position in the photo, the sign was angled for the back to show, but that did not occur at any other time during the event. Mayor Stone removed the word elect from the sign, so clearly had no intention to use the sign for any purpose other than identification to show the public official support for the event.

Doc. 19, page 34: The print-out is a post from a personal social media account – not from a public resource. Furthermore, it does not depict any campaign endorsement. Again, the sign was only intended

as an identification sign and to project official support for the celebration of the LGBTQIA community and the event.

Doc. 20, page 35: This post shows Christina Hines expression of her strong support for the event. It includes photos of her enjoying the event, and no political message is included. Clearly, Mayor Stone posting "love" was her response to the message and photos of Ms. Hines enjoying the event. The complaint has grossly mischaracterized the "love" post as political.

Doc. 21, page 36: The image is from a private website, and it is not a City of Warren website or social media account. Mayor Stone and the other elected officials do not violate the MCFA by endorsing a candidate.

Doc. 22, page 37: The photo accurately depicts the booth of a candidate. No City of Warren official or employee had prior knowledge of State Representative Mike McFall's booth. The City did not supply him with any table, chair or equipment. Neither the City of Warren or Mayor Stone or anyone in her administration endorsed Mike McFall at the event, or did anything to assist in his election. The event was widely publicized, and other candidates had an equal opportunity to the grounds.

Doc. 23, page 38: Nothing in the photo identifies Mike McFall as a candidate. The photo only depicts Rep. McFall wearing a shirt with his name and office; "Mike McFall State Representative" only appears in the photo. A campaign message does not appear. The photo depicts Mayor Stone on the grounds with Rep. McFall and was not captured with her at his campaign booth. She does not mention him as a candidate or his campaign in her post. Clearly, the photo is not a campaign endorsement. Rep. McFall is a self-identified member of the LGBTQIA community, who attended the event to show his official support for the celebration. The photo depicts Mayor Stone's unity in support with him, and it is not a reflection of her political viewpoint.

Doc. 24, page 39: The post is from the private account of a candidate. It is separate from the City of Warren, and is not even connected to the Pride Festival. The complainant correctly states that Mayor Stone's endorsement along with other elected officials' endorsements on campaign website is not a campaign finance violation. There is no correlation between her general endorsement of him as a candidate and his booth at the Pride Event. She did not invite him to the Pride Event, and had no prior knowledge that he would set up a campaign booth. As evident from her facial expressions at the event, her mindset was pure enjoyment of the event, fellowship with the other participants, and pride in the community support for the celebration. Mayor Stone did not participate at the event to endorse a candidate nor to use the event for any purpose other than to celebrate inclusivity.

Doc. 25, page 40: The LARA print-out furnished by the complainant shows Christine Hines connection to Women of Warren. She is the president, and commitment to the Women of Warren organization. She did not want her campaign involved with the Pride Festival. This is evident by her not wearing any campaign attire and having the flyer immediately removed when she learned someone had placed it in the booth. The flyer was not openly displayed on the grounds to all onlookers, and in any event, certainly not a basis to impute any wrongdoing by the City of Warren or Mayor. It appeared in a booth privately managed by a third party sponsor, without prior knowledge or consent by the City of Warren or Mayor Stone.

Doc 26, page 41: The LARA print-out shows that the event sponsor, Library for Inclusion is a third party, non-profit organization, formed and existing separate from the City of Warren. Attachment 1 is the rental application submitted by the Library for Inclusion to use the public space to host the event. Also attached is a LARA print-out of its most recent update, which describes its work and accomplishments. The Pride Festival is consistent with its mission. See Attachment 6.

Doc. 27, page 42. This document is irrelevant. Mayor Stone was elected to a four-year term of mayor in November 2023, and Mayor Stone is not a candidate for an office in the general November 2024 election.

Doc. 28, page 43. This document is irrelevant. Mike McFall is State Representative and self-identified member of the LGBTQIA community, whose district includes Warren, Michigan. His participation serves as his official support for the LGBTQIA Warren Pride Festival. His campaign purchased a private booth.

The campaign booth was secondary to his commitment to the community. The statement of organization shows he is a candidate and speaks for itself. Yet, it does not contribute to the complaint, and bears no relation to his personal or official support for the event.

Doc. 29, page 44. The newspaper article is relevant for purposes of describing a controversial aspect of the festival. Library for Inclusion rented booths to adult novelty vendors. The booths were on the grounds without the prior knowledge or consent of Mayor Stone, her staff or the Acting Parks and Recreation Director. One of the vendors did not follow the organizers' rules, and openly displayed items not suitable for children. The booth was positioned in an area that was not appropriate, which the planners claimed was unintended by them. This infraction stirred public outcry, and unfortunately tainted the event. The criticism over this controversy migrated into other aspects of the event that likely would not otherwise be in controversy.

Should you have any questions or require further information, please feel contact me at (586) 574-4585 or mmichaels@cityofwarren.org.

Respectfully,



Mary Michaels
Acting City Attorney

ATTACHMENT 1



WARREN

Civic Center Room Rental Application

APPLICANT INFORMATION

Name Monica Papasian Title President/Treasurer Organization The Papasian Library for Equality & Inclusion

Applicant type (check one):

- ☐ Individual Warren Resident
☐ The City of Warren or Government Agency Serving the City
☒ Warren-Based Registered 501(c)(3) Nonprofit Organization
☐ Warren Business
☐ Non-Warren Individual, Organization, Groups, Association, or Nonprofit

Address 6106 Chicago Rd City Warren Zip Code 48092

Phone (home/business) _____ (cell) 586-XXXX-XXXX Email XXXX@XXXX.com

ROOM AND EQUIPMENT RENTAL

Room(s) (see Reservation Fee Schedule):

- ☒ Conference Center (max. 130 people)*
☒ Atrium (max. 300 people)*
☒ Meeting Room (max. 16 people)**

* Unless waived, three hour minimum.

** Meeting rooms are only available Mon.-Fri. from 8:30 a.m. - 5:00 p.m.

Expected Attendance: _____

Type of Activity: Pride Celebration

Will food be served? ☐ Yes ☒ No

Number of Tables _____ Number of Chairs _____

Check any additional requests:

- ☐ Kitchen Access (\$30 per day)
☐ Technical Set Up (varies)

Date and Time (list all dates and times requested):

Saturday, June 29, 2024

10:00 am - 6:00 pm

Conference Room Set-Up:

(see attached room set up sheet)

- ☐ U-Shape ☐ Theatre
☐ Square Table ☐ Classroom
☐ Banquet ☐ Other

Equipment Rental (price per day):

- ☐ TV/VCR/DVD (\$15) ☐ Podium w/ Mic (\$25)
☐ Overhead Projector (\$15) ☐ Screen (\$5)
☐ PC Cart (\$25) ☐ Internet Access (\$5)
☐ Platform/Stage (\$20)

Additional Comments/Requests:

The conference room will be a staging area for the performers (drag & musical); the meeting room would be for event organizers to store their items & meet. The atrium would be used for childrens activities. A platform/stage in the atrium would be great for the drag story hour if at all possible.

ACKNOWLEDGMENTS / INDEMNIFICATION

By signing this Application I verify all of the following: I provided this Application to the DDA (Downtown Development Authority) office on the date indicated below; the information on this Application is, to the best of my knowledge, accurate; I attached a check, cashier's check, or money order to this Application in the amount of the required Security Deposit; I understand that the DDA may use this Security Deposit to cover any damages that occur as a result of this Rental; I have read, understand, and agree to abide by this Application, the Civic Center Room Rental Policies and Rules, the Civic Center Room Reservation Fee Schedule, and the Civic Center Atrium Rental Policies and Rules (if applicable); no later than two weeks before the first day listed on the requested reservation, I will pay the total amount due for the rental; I am over the age of 21; I am authorized to sign on behalf of the organization listed on this Application (if applicable); following the rental period, I will pay for any damages that occurred to the rented space during the rental period, including: missing or damaged equipment, furnishings, and fixtures; I understand that the dates requested on this Application are not guaranteed; and the DDA has the authority to cancel or reschedule any reservation at any time for any reason.

Furthermore, I shall indemnify the City, the DDA, the City of Warren Municipal Building Authority, the City of Warren Tax Increment Finance Authority, the 37th District Court, and the officials, officers, employees, agents of the above listed entities (Entities) from and against any claim of liability; penalties; damages; attorney fees; professional advisors fees; settlements; or other expenses arising from or in connection with the Rental, including but not limited to the reservation, the rental space during the rental period, and this Application. Finally, I shall provide the Warren City Attorney's Office with all documents filed in any proceeding related to the Rental in which any of the Entities are named.

Applicant Signature: Monica Papasian

Date: 4/24/24

Printed Name: MONICA PAPASIAN

Title: President/Treasurer

PLEASE NOTE

This application must be submitted in person to the DDA office on the Second Floor of City Hall at least **TWO WEEKS** before the first day listed on the requested reservation.

The Applicant must submit all of the following with the Application:

The required **SECURITY DEPOSIT**;

CERTIFICATE OF INSURANCE, Waiver, or signed documentation indicating self-insurance;

Signed **RENTAL POLICIES AND RULES**;

501(c)(3) REGISTRATION (if applicable).

Incomplete Applications will be returned to the Applicant. Total rental fees are due **14 days** before the first day listed on the requested reservation. This payment is in addition to the Security Deposit.

PLEASE CONTACT THE DDA OFFICE AT (586) 574-4676 WITH QUESTIONS.

FOR OFFICE USE ONLY:

☒ Timely Application (at least 2 weeks prior to rental)

☒ Signed Application (two pages)

☒ Signed Acknowledgement of Rental Policies and Rules and Atrium Rules

☐ Insurance Certificate/Waiver

☐ Security Deposit

☒ No Scheduling Conflicts

☒ Nonprofit 501(c)(3) Registration (if applicable)

☒ Room Fee Waiver (if applicable)

☒ Copy of Applicant's Driver's License or State ID

Total Room Fees _____

Total Equipment Fees _____

Total _____

Full amount due date _____
(due 14 days before rental)

- ii. **Prohibited Uses.** The Warren Civic Center Rooms shall not be used in any of the following ways:
- (a) For an event charging an admission or other fee.
 - (b) To solicit money donations.
 - (c) Unless the DDA Director grants written permission to a non-profit community organization that is using the rental to provide a public service to the Warren Community, to sell merchandise, products or services.
 - (d) To host private special events, including, but not limited to: birthday parties, wedding receptions, graduation parties, reunions, holiday parties, baby or wedding showers, and banquets. This does not include special events or parties held by the City of Warren.
 - (e) Catered events where a catering company or similar business uses the kitchen to provide food to event participants.
 - (f) Commercial filming activities, unless the Applicant has applied for and received a valid photography permit. Commercial filming includes the film, electronic, magnetic, digital, or other recording by a person, business, or other entity with the intent of generating income.
 - (g) Campaigning for a political office.

8. RENTAL RULES

- i. **General.**
The Applicant shall do all of the following:
- (a) check in with the Civic Center staff before the event begins;
 - (b) ask Civic Center staff about parking responsibilities during the event;
 - (c) be responsible for and present at the rental area during the reserved hours;
 - (d) supervise the event attendees during the reserved hours and when the attendees are entering and exiting the Civic Center;
 - (e) follow all instructions and requests from Civic Center staff; and
 - (f) immediately report any property damage or personal injury that occurs in the Civic Center to the Civic Center staff.
- ii. **Set up and tear down.**
- (a) Unless the DDA Director grants written permission before the event, the rental area is not available for setup before the beginning of the reserved hours.
 - (b) Tear down and cleanup shall be completed before the end of the rental period. Staying beyond the reserved hours will result in additional charges and a forfeiture of the Security Deposit.
- iii. **Decorations.**
- (a) Transparent, one-sided tape may be used as long as it is completely removed during cleanup
 - (b) Nails, push pins, hangers, thumb tacks, double-sided tape or similar items are prohibited.
 - (c) Candles or other open flames are prohibited.
 - (d) Confetti, helium-filled balloons, glitter, or sequins are prohibited.
 - (e) All types of balloons are prohibited in the Atrium.
- iv. **Fire Prevention.**
The Applicant shall comply with all of the following fire prevention regulations:
- (a) No open flames.
 - (b) Ensure that electrical extension cords and decorations are without exposed wires and are UL approved.
 - (c) Obtain approval from the DDA Director before installing posters, banners, and any other large decorations.
 - (d) Keep corridors, exits, and stairways free of obstructions
 - (e) Light exits when rooms are in use.
- v. **Clean-up.**
- i. The Applicant shall leave the rental area in the same condition that it was before the event.
 - ii. The Applicant shall perform or ensure that all of the following clean-up is completed before the end of the reservation period:
 - (a) Removing all items brought in for the event.

- (b) Removing all decorations.
 - (c) Placing all trash in plastic bags for disposal.
 - (d) Wiping down tables and chairs.
 - (e) Clean any spills or messes.
- vi. Parking and other use of the Civic Center.
 - (a) Under the supervision of the Applicant, event attendees may use the parking facilities (including the parking structure and legal street parking in front of the Civic Center). The Applicant or other event host shall not charge attendees for parking.
 - (b) Unless the DDA Director grants written permission before the event, the event attendees shall only use the rental and parking area and the public restrooms.
- vii. Prohibitions.

Unless the DDA Director grants written permission, the following are prohibited in the Civic Center before, during, and after the reserved hours:

 - (a) Smoking;
 - (b) Alcoholic beverages;
 - (c) Advertising;
 - (d) Sale of merchandise, products or services; and
 - (e) Large entertainment equipment.

9. APPLICANT RESPONSIBILITY

- i. The Applicant shall ensure event attendees:
 - (a) Behave appropriately in the Civic Center;
 - (b) Follow all directives and rules of the DDA; and
 - (c) Do not use Civic Center areas that are outside the rental area to conduct the event.
- ii. The Applicant shall also ensure that the event is:
 - (a) Suitable for a public building;
 - (b) Does not disturb the regular Civic Center business and activities; and
 - (c) is lawful and in conformity with local, State and Federal laws and ordinances.
- iii. The Applicant shall pay the DDA for any damages or additional costs incurred by the DDA as a result of the event or using the room. The DDA shall apply the forfeited security deposit to the damages and costs.

Please call (586) 574-4676 or (586) 574-4529 for further information.

By signing below, the Applicant acknowledges that he has received, read, understood, and agree to be bound by the Civic Center Atrium Rules.

MONICA PAPASIAN
Applicant Name (printed)

Monica Papasian
Applicant Signature

Date: 4/24/24

ATTACHMENT 2



**SATURDAY
JUNE 29 2024**

11:30AM–6PM

WARREN CITY HALL

1 City Square, Warren, MI 48093

11:30AM–12:00PM

PRIDE PARADE

12:00PM–6:00PM

**FESTIVITIES AND
ENTERTAINMENT**

- Special Presentations
- Live Music
- Drag Story Time
- Drag Shows
- Special Guest Rachel Crandall-Crocker
- Food Trucks
- LGBTQIA+ Education and Resources
- Kid Activities
- Event Shirts
- Local Vendors



SPECIAL GUEST

**ATTORNEY GENERAL
DANA NESSEL**

Everyone is welcome to
celebrate and support the
LGBTQIA+ Community

Join us as we celebrate
Warren's First LGBTQIA+
Pride with an all-day free
family-friendly celebration

8:00PM–12:00AM

**ADULT AFTERGLOW AT
KUHNHENN BREWING**

5919 Chicago Rd, Warren, MI 48092

- Food Trucks and Fun Times

**HELP SUPPORT
WARREN PRIDE**



Donations



FB Event

More info:   
@warrencitypride
warrencitypride@gmail.com
warrencitypride.com

ATTACHMENT 3

RESOLUTION RECOGNIZING JUNE AS PRIDE MONTH

WHEREAS, the Warren City Council is committed to fostering an inclusive, diverse and welcoming community for all residents, visitors and employees; and

WHEREAS, Pride Month is a time to celebrate the history, culture and contributions of the LGBTQ+ community, and to acknowledge the ongoing struggles and achievements in the fight for equal rights and acceptance; and

WHEREAS, the Warren City Council acknowledges the importance of promoting equality, dignity and respect for all individuals regardless of sexual orientation, gender identity, or gender expression; and

WHEREAS, the Warren City Council values the diversity of its residents and recognizes that the LGBTQ+ community is an integral part of our social fabric, contributing to the enrichment and vitality of our city; and

WHEREAS, by recognizing Pride Month, the Warren City Council aims to raise awareness, promote inclusivity, and encourage dialogue and understanding among all residents;

NOW, THEREFORE, LET IT BE RESOLVED that we, the Warren City Council does hereby proclaim June as Pride Month in the City of Warren;

BE IT FURTHER RESOLVED, the Warren City Council encourages all residents, businesses and community organizations to join in the observance of Pride Month, to participate in events and activities, and to work towards a future of equality and inclusion for all.

RESOLUTION DECLARED ADOPTED this 28th Day of May, 2024.

*Angela Rogensues, Council President
Melody Magee, Council Vice President
Mindy Moore, Council Secretary
David Dwyer, Council Assistant Secretary
Gary Boike, Councilmember
Jonathan Lafferty, Councilmember
Henry Newnan, Councilmember*

ATTACHMENT 4

LARA Corporations Online Filing System

Department of Licensing and Regulatory Affairs

ID Number: 802952531[Request certificate](#)[Return to Results](#)[New search](#)**Summary for:** WOMEN OF WARREN**The name of the DOMESTIC NONPROFIT CORPORATION:** WOMEN OF WARREN**Entity type:** DOMESTIC NONPROFIT CORPORATION**Identification Number:** 802952531**Date of Incorporation in Michigan:** 12/05/2022**Purpose:** Other**Term:** Perpetual**Most Recent Annual Report:** 2023**Most Recent Annual Report with Officers & Directors:** 2023**The name and address of the Resident Agent:**

Resident Agent Name: ROCHELLE J. KELLEY

Street Address: 5685 ARDEN AVE

Apt/Suite/Other:

City: WARREN

State: MI

Zip Code: 48092-1149

Registered Office Mailing address:

P.O. Box or Street Address: 5685 ARDEN AVE

Apt/Suite/Other:

City: WARREN

State: MI

Zip Code: 48092-1149

The Officers and Directors of the Corporation:

Title	Name	Address
PRESIDENT	CHRISTINA HINES	4817 LA CHENE DR WARREN, MI 48092 USA
TREASURER	ROCHELLE J KELLEY	5685 ARDEN AVE WARREN, MI 48092-1149 USA
SECRETARY	MONICA BIHAR-NATZKE	11347 LOGINAW DR WARREN, MI 48089 USA
DIRECTOR	REBECCA ZAINOS	7019 HUPP WARREN, MI 48091 USA
DIRECTOR	TAYLOR JOHNSON	4829 LA CHENE DR WARREN, MI 48092 USA
DIRECTOR	SARAH MISTRETTA	5685 ARDEN AVE WARREN, MI 48092-1149 USA

Act Formed Under: 162-1982 Nonprofit Corporation Act**Acts Subject To:** 162-1982 Nonprofit Corporation Act

The corporation is formed on a Membership basis.

☐ **Written Consent**

View filings for this business entity:

ALL FILINGS
ANNUAL REPORT/ANNUAL STATEMENTS
ARTICLES OF INCORPORATION
ARTICLES OF INCORPORATION
RESTATED ARTICLES OF INCORPORATION

View filings

Comments or notes associated with this business entity:

[LARA FOIA Process](#) [Transparency](#) [State Web Sites](#)

[Michigan.gov Home](#) [ADA](#) [Michigan News](#) [Policies](#)

Copyright 2024 State of Michigan

ATTACHMENT 5

Sec. 7.3 - Duties of the mayor.

Under the provisions of this charter, insofar as is required by law, and for all ceremonial purposes, the mayor shall be the administrative and executive head of this city. He shall be a conservator of the peace and may exercise within the city the powers conferred upon sheriffs to suppress disorder. He shall have authority to command the assistance of all able-bodied citizens to aid in the enforcement of the ordinances and regulations of the council, and the authority of the city government. The powers and duties of the mayor shall include the following duties and functions:

- (1) Keep an office in a convenient place to be provided by the council;
- (2) See that all laws and ordinances are enforced within the city;
- (3) Except as in this charter otherwise provided, have power of appointment and removal over officers, departmental directors, and the members of commissions and boards;
- (4) See that all terms and conditions imposed in favor of the city or its inhabitants in any public utility franchise, or in any contract, are faithfully kept and performed;
- (5) Authenticate by his signature such instruments and proceedings as are required to be authenticated by him by law or by the council;
- (6) Prepare the annual budget proposal and present it to the council with an explanation thereof at the time and in the manner required by this charter;
- (7) Keep the council fully advised at all times as to the financial conditions and needs of the city;
- (8) On or before the first day of September in each year, prepare and submit to the council and the public, as of the end of the fiscal year, a complete report of the finances and administrative activities of the city during the prior fiscal year;
- (9) Recommend to the council for adoption such measures as he may deem necessary or expedient;
- (10) Be responsible for the efficient administration of all departments of the city government;
- (11) Approve the administrative rules and regulations of the several directors, commissions, or boards in charge of the departments of the city government, before such rules and regulations shall be filed with the city clerk;
- (12) Require and receive monthly reports relative to the activities of each department from the respective department heads;
- (13) Act as and be the sole spokesman for the administrative service and officers of the city, except for the clerk, the treasurer, and the assessor insofar as their duties are provided by law;
- (14) Exercise and perform all administrative functions of the city which are not imposed by law

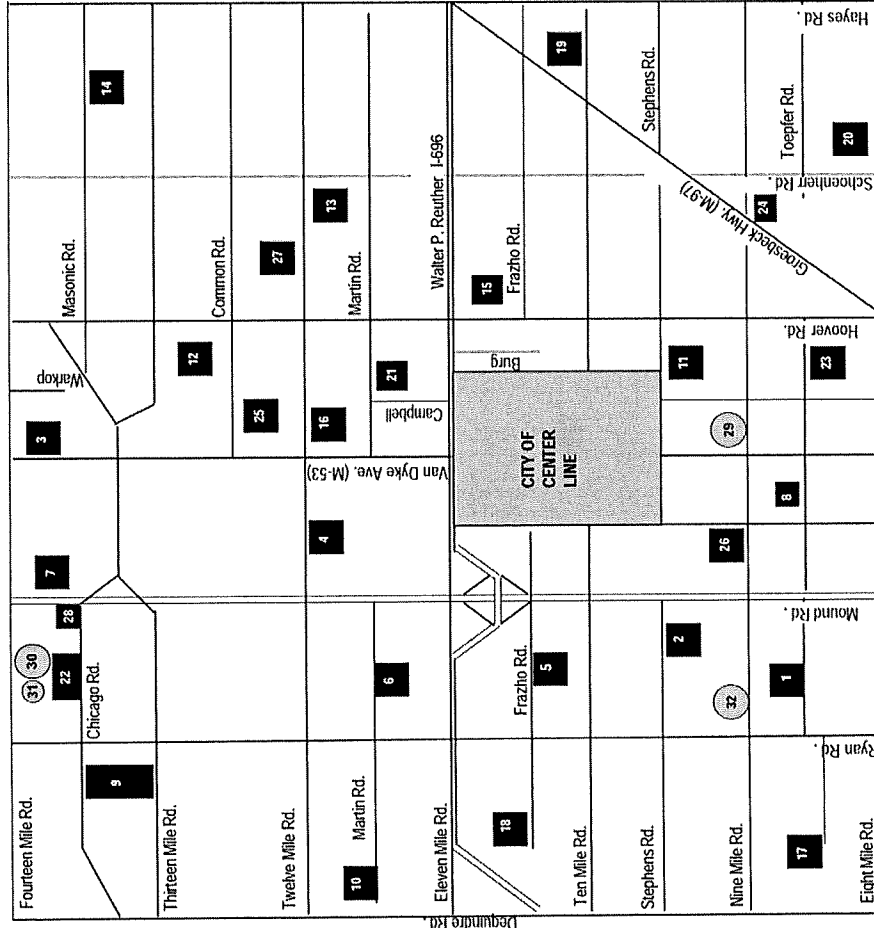
or ordinance on some other city officer or agency;

- (15) Exercise such other powers and perform such other duties as may be prescribed by law, or as may be required of him by ordinance or by direction of the council;
- (16) Keep himself informed and report to the council, either of his own accord or in answer to questions put by the council, concerning the work of the several administrative officers and departments of the city and, to that end, secure from the officers and the heads of all administrative departments such information and periodical or special reports as he or the council may deem necessary;
- (17) Perform all acts required by law, whether herein specifically enumerated or not.

State Law reference— Mandatory that Charter provide for the qualifications and duties of its officers, MCL 117.3(d).

ATTACHMENT 6

Warren Parks and Recreation's Parks and Facilities Map



Warren
Parks and Recreation

Always Movin'

Office & Recreation Facilities



Parks

****Rentals Available!** Call for park pavillion rental information at
(586) 268-8400 or visit www.cityofwarren.org

City Parks		Picnic Area	Picnic Shelter**	Capacity/Seating	Electricity	Restrooms	Play Equipment	Walking Path	Ball Fields	Soccer Fields	Volleyball	Basketball	Tennis Courts	Special Features*
1.	Nicholas W. Altermatt
2.	Austin Dannis	.	1	34	1
3.	Ted Bates
4.	Louis J. Burdi	.	1	34	2	.	.	.	D
5.	Jeanne O. Busse	.	1	32
6.	Thomas L. Butcher	.	1	75	.	.	.	2
7.	George P. Eckstein	S
8.	Eugene B. Groesbeck	.	1	50	1	.	.	1	.	.
9.	Norman J. Halmich	.	2	100/600	6	6	1	.	6	.
10.	Oscar Hartsig	.	1	75	2	2	.	.	.
11.	Jaycee	.	1	34
12.	Frank J. Licht	.	1	75
13.	Clarence M. McGrath	1	1
14.	Arthur J. Miller	.	1	75	1	.	.	1	.	.
15.	Grace Rentz
16.	Leo G. Rinke	2
17.	William A. Shaw	.	1	75	.	.	.	2
18.	Clarence J. Steinhauer	1
19.	Joseph W. Trombley	1
20.	Orba A. Underwood	.	1	34
21.	Veterans Memorial	.	2	75/24	1	.	.	.	B/P RH
22.	Warren Community Park	.	2	34	2	.	.
23.	Frank Wiegand	.	1	150	.	.	.	3
24.	Anthony F. Winters	.	1	48	1
25.	City Square Park	.	1	32	F/Al	.
26.	Civic Center South
27.	Ridgewood
28.	Beebe Corner

- * Special Features Key
B - Bocce Courts
P - Pool (Indoor Aquatic Center)
D - Dog Park
F - Fountain/Splash Area (May-Sept.)
S - Skate Park (Under Construction)
AI - Artificial Ice Rink (Dec.-Mar.)
RH - Roller Hockey
29. Owen Jax Recreation Center
8207 E. Nine Mile (586) 757-7480
30. Warren Community Center
5460 Arden (586) 268-8400
31. Transportation Office
5460 Arden (586) 268-0551
32. Fitzgerald Recreation Center
4355 Nine Mile (586) 759-0920

ATTACHMENT 7



Form Revision Date 07/201

ANNUAL REPORT
For use by DOMESTIC NONPROFIT CORPORATION
(Required by Section 911, Act 162, Public Act of 1982)

The identification number assigned by the Bureau is: 802598342

Annual Report Filing Year: 2023

1. Corporation Name:

THE PAPASIAN LIBRARY FOR EQUALITY AND INCLUSION

2. The street address of the corporation's registered office and the name of the resident agent at that office:

1. Resident Agent Name: MONICA PAPASIAN

2. Street Address: 6106 CHICAGO RD

Apt/Suite/Other:

City: WARREN

State: MI

Zip Code: 48092

3. Mailing address of the corporation's registered office:

P.O. Box or Street Address: 6106 CHICAGO ROAD

Apt/Suite/Other:

City: WARREN

State: MI

Zip Code: 48092

5. Provide the names and business or residence addresses of the corporation's board of directors and its president, treasurer, and secretary:

Title	Name	Residence or Business Address
PRESIDENT	MONICA PAPASIAN	6106 CHICAGO RD, WARREN, MI 48092 USA
TREASURER	MONICA PAPASIAN	6106 CHICAGO RD, WARREN, MI 48092 USA
SECRETARY	LOREN PAPASIAN	6106 CHICAGO ROAD, WARREN, MI 48092 USA
DIRECTOR	LEANDA ANDERSON	51437 CAROLINE DR, CHESTERFIELD, MI 48047 USA
DIRECTOR	MONICA PAPASIAN	6106 CHICAGO RD, WARREN, MI 48092 USA
DIRECTOR	LOREN PAPASIAN	6106 CHICAGO ROAD, WARREN, MI 48092 USA

6. Describe the purposes and general nature and kind of business in which the corporation engaged in during the year covered by this report:

OUR FOCUS WAS MAKING RESOURCES AND OPPORTUNITIES IN OUR COMMUNITY DIVERSE AND EQUITABLY ACCESSIBLE. IN 2023 WE PLANNED WARREN MICHIGAN'S FIRST JUNETEENTH CELEBRATION, WE DISTRIBUTED MORE THAN 100 BAGS OF SCHOOL SUPPLIES TO THE COMMUNITY, THROUGH THE LIBRARY WE DISTRIBUTED 100+ PACKS OF MULTICULTURAL SKIN TONE CRAYONS, 1,000+ BOOKS AND MATERIALS ABOUT EQUALITY, INCLUSION, MINORITY GROUPS, MARGINALIZED AND UNDER-REPRESENTED MEMBERS OF OUR COMMUNITY. WE WORKED WITH HABITAT FOR HUMANITY TO EXPAND OUR LIBRARY PRESENCE AND ARE HAVING A LIBRARY INSTALLED IN THEIR NEW STORE LOCATION, WE HAVE ENGAGED THE COMMUNITY ENCOURAGING MORE PEOPLE TO SIGN UP TO VOTE, SPONSORED AN EARTH DAY PARK CLEAN UP EVENT, WORKED WITH LOCAL ORGANIZATIONS TO PROVIDE RESOURCES AND HELP PROMOTE COMMUNITY

Signed this 30th Day of September, 2023 by:

Signature	Title	Title if "Other" was selected
Monica Papasian	President	

By selecting ACCEPT, I hereby acknowledge that this electronic document is being signed in accordance with the Act. I further certify that to the best of my knowledge the information provided is true, accurate, and in compliance with the Act.

☐ Decline ☒ Accept

MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
FILING ENDORSEMENT

This is to Certify that the 2023 ANNUAL REPORT

for

THE PAPASIAN LIBRARY FOR EQUALITY AND INCLUSION

ID Number: 802598342

received by electronic transmission on September 30, 2023, is hereby endorsed.

Filed on September 30, 2023, by the Administrator.

The document is effective on the date filed, unless a subsequent effective date within 90 days after received date is stated in the document.



In testimony whereof, I have hereunto set my hand and affixed the Seal of the Department, in the City of Lansing, this 30th day of September, 2023.

Linda Clegg

Linda Clegg, Director

Corporations, Securities & Commercial Licensing Bureau



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

September 23, 2024

Paul Kardasz
29539 Dover Avenue
Warren, MI 48088

Re: *Kardasz v. City of Warren et al*
Campaign Finance Complaint No. 24-068

Dear Paul Kardasz:

The Department of State received a response from the City of Warren 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 Section
Bureau of Elections
Michigan Department of State

Attachment
c: City of Warren

**Michigan Bureau of Elections Regulatory Section
Richard H. Austin Building First Floor
430 W. Allegan
Lansing, Michigan 48918**

Rebuttal to City of Warren Response in the matter of Kardasz v. City of Warren, et al Campaign Finance Complaint No. 24-068

October 1, 2024

To Whom it May Concern:

I. Introduction

In the matter of Kardasz v. City of Warren, et al, Campaign Finance Complaint No. 24-068, allegations have been raised under Section 57 of the Michigan Campaign Finance Act regarding the misuse of public resources for campaign activities in connection with the Warren City Pride event. These claims involve improper use of city-owned resources, social media platforms, and city staff time to support the Pride event which was leveraged by certain political campaigns, potentially in violation of the MCFA.

Following the allegations, the reason to believe standard used to determine a potential or actual violation of Section 57 of the Michigan Campaign Finance Act was not overcome by the City of Warren in its defense of Respondents 1 (City of Warren) and 2 (Mayor Lori M. Stone).

In this case, the City of Warren's response failed to provide sufficient evidence to overcome the presumption of impropriety regarding the use of public resources for the promotion and logistical support of the Warren City Pride event. The event, as documented, involved political candidates and campaign-related activities. The use of city-owned social media platforms, official websites, and staff resources to promote an event intertwined with political campaigns constitutes a clear misuse of public resources, directly contradicting the prohibitions under Section 57.

Moreover, the City's argument did not address or explain how these resources were utilized in compliance with the MCFA, nor did it provide any justifiable exemption that would permit the City's involvement in an event that promoted political figures and campaigns. The reliance on city infrastructure and staff for event promotion, combined with the political nature of the event, signals a violation of both the letter and spirit of the law. Therefore, the City's defense falls short of meeting the reasonable standard of lawful conduct in this context.

II. Improper Defense by the City of Warren in Violation of the Michigan Campaign Finance Act

The City of Warren's decision to provide response in the form of statements for the respondents—Lori M. Stone, Candidate for Mayor of Warren; Christina Hines, Candidate for Prosecuting Attorney; and Mike McFall, Candidate for Representative in the State Legislature—constitutes a significant violation of the Michigan Campaign Finance Act (MCFA). This act is intended to promote transparency and accountability in political campaigns and to prevent the misuse of public resources for private political gain.

Furthermore, the submission of these statements, presented without supporting documentation, directly aligns with the original allegations that public resources were improperly utilized during the Pride event. Such use of public resources not only benefits the political candidates in question but also undermines the integrity of the electoral process. The complainant seeks to have this assertion added to the complaint, as it reinforces the claim that the City's actions facilitated a breach of the MCFA and blurred the lines between public service and political campaigning.

The complainant contends that there is no legal basis for the City of Warren Department of Law to make statements on behalf of any candidate committee or non-public official in this matter. The Michigan Campaign Finance Act (MCFA) mandates clear lines between public resources and political activities, designed to ensure that public officials and entities do not engage in actions that could be perceived as supporting or promoting individual political candidates.

By allowing the Department of Law to issue statements on behalf of political candidates, the City not only oversteps its bounds but also raises serious questions about the propriety and legality of such actions. This lack of adherence to legal standards further compounds the violations already alleged, suggesting an inappropriate intertwining of public resources and political interests that the MCFA expressly seeks to prevent.

The complainant asserts that any statements made by the City of Warren in this context should be regarded as invalid and should not be accepted as authoritative or factually accurate representations of the respondents' positions.

III. Submission of Statements on Behalf of Respondents Without Supporting Documentation

In response to the allegations regarding campaign activities during the Warren Pride Festival, the City of Warren has submitted statements from the following respondents—Monica Papasian, as President of The Papasian Library for Equality and Inclusion; Christina Hines, as President of Women of Warren; Lori M. Stone, as Candidate for Mayor of Warren; Christina Hines, as Candidate for Prosecuting Attorney; and Mike McFall, as Candidate for Representative in State Legislature. It is important to note that these statements are presented without accompanying supporting documentation. The acceptable forms of statements submitted include:

- **Affidavits:** Signed declarations made under oath by each respondent, affirming the accuracy and truthfulness of the information provided.
- **Written Responses:** Formal letters from each respondent detailing their positions on the allegations, including relevant context and clarifications.
- **Public Statements:** Official comments made in public forums, such as speeches or press releases, articulating each respondent's viewpoint and actions regarding the event in question.

Given the absence of supporting documentation, the complainant cannot accept the City's statements as fact. Furthermore, the State should exercise caution in considering these submissions, as the lack of verification undermines the credibility of the assertions made by the respondents. The absence of supporting evidence calls into question the

reliability and authenticity of the statements, highlighting the need for thorough investigation and fact-checking before any conclusions are drawn.

In light of the statements submitted by the City of Warren concerning the allegations of campaign activities during the Warren Pride Festival, the complainant seeks the reinstatement of all respondents dismissed on July 22, including Monica Papasian, Christina Hines, Lori M. Stone, and Mike McFall. The City has provided statements on behalf of these individuals, asserting their positions without the necessary supporting documentation.

IV. Consideration of the Cultural Commission and Monica Papasian's Actions

The State must carefully consider the actions of the Cultural Commission (***EXHIBITS 1 & 2***) and Monica Papasian in relation to their "sponsorship" or "support" of the Pride event when applying the "reason to believe" standard to Respondents 1 and 2. This consideration is crucial for several reasons:

- **Dual Roles:** Monica Papasian serves in dual capacities that raise significant considerations. As a city official appointed under the authority of Mayor Lori M. Stone to a commission of the City of Warren, she holds a position of public trust. Simultaneously, as President of The Papasian Library for Equality and Inclusion, her actions can significantly influence public perception and obviously City policy. This duality creates a potential conflict of interest that must be examined closely in light of her involvement with the Pride event.
- **Linkage to Public Resources:** The Cultural Commission, as a public entity, may have facilitated the use of public resources for the Pride event. The inclusion of the Cultural Commission logo on promotional materials is a fact which is not disputed by the City. While these promotional materials dawned the City's Cultural Commission logo, they did not expressly name The Papasian Library for Equality and Inclusion; Women of Warren; or dawn the respective logos of either of those public charities.
- **Influence on Political Activities:** Papasian's role as a city official, serving on an advisory board to the Mayor, may amplify the perception that her involvement in

promoting the Pride event amounts to an endorsement of the political candidates participating in the event. This potential influence necessitates examination, as it directly relates to whether public resources were utilized for private political gain. The perceived or actual support from public officials can create a narrative that blurs the lines between public service and political campaigning.

- **Precedent for Accountability:** Understanding the actions of the Cultural Commission and its leadership is essential in establishing a precedent for accountability. If public entities are allowed to engage in activities that support political candidates without proper oversight, it undermines the integrity of the electoral process. By applying the "reason to believe" standard to the Cultural Commission and its members, the State can assess the full scope of public involvement and ensure that all parties are held accountable for their actions.
- **Broader Context of Allegations:** The allegations surrounding Respondents 1 and 2 cannot be viewed in isolation. The involvement of the Cultural Commission and Monica Papasian as a city official provides critical context for understanding the broader implications of public support for political candidates during the Pride event. This context is vital for evaluating whether the actions taken were in alignment with the principles of transparency and accountability outlined in the MCFA.

The State's consideration of the Cultural Commission and Monica Papasian's actions is imperative for a comprehensive assessment of the allegations against Respondents 1 and 2, ensuring that all relevant factors are taken into account when determining compliance with the Michigan Campaign Finance Act.

V. Examination of Women of Warren and The Papasian Library for Equality and Inclusion

The State must similarly examine the actions of Women of Warren and The Papasian Library for Equality and Inclusion in light of the potential for these organizations not to have acted independently of the City of Warren and the candidates involved. This examination is crucial for several reasons:

- **Interconnected Leadership:** The leadership structures of Women of Warren and The Papasian Library for Equality and Inclusion may overlap with those of the City of Warren.
 - Given that Monica Papasian holds a significant role in at least The Papasian Library for Equality and Inclusion, Women of Warren (**EXHIBIT 3**) and the City of Warren, any decisions made by these entities regarding the Pride event must be scrutinized to determine if they reflect the interests of the city and its candidates rather than independent organizational goals. This interconnectedness raises questions about whether actions taken were genuinely autonomous or influenced by political considerations.
 - Stone's membership potentially in Women of Warren and The Papasian Library for Equality and Inclusion while simultaneously holding the Office of Mayor warrants scrutiny as to her administrative responsibilities and duties to ensure all laws and local ordinances are followed. Such decisions to allow for fees or to provide in-kind support to an organization she is a member of which held an event which was exploited by political candidates should be scrutinized.
- **Shared Resources and Influence:** Both organizations operate within the public sphere and may have access to city resources, networks, and funding. If Women of Warren and The Papasian Library for Equality and Inclusion utilized public resources or facilitated city support for the Pride event, this could suggest that their actions were not independent but rather coordinated with the City of Warren and potentially the candidates featured at the event. Such collaboration raises concerns under the Michigan Campaign Finance Act (MCFA) regarding the potential misuse of public funds for political purposes.
- **Perception of Political Endorsement:** The activities of Women of Warren and The Papasian Library for Equality and Inclusion during the Pride event may be perceived as endorsements of the political candidates who became involved. If these organizations acted in concert with the City of Warren and its elected officials, the line between civic engagement and political campaigning becomes

blurred. This situation necessitates scrutiny to determine whether their involvement represents genuine advocacy or a strategic effort to bolster political campaigns using organizational platforms.

- **Potential for Collusion:** If it is found that Women of Warren and The Papasian Library for Equality and Inclusion coordinated their activities with city officials and the then involved candidates, this may constitute collusion to support political activities improperly. Such collusion undermines the integrity of both the organizations and the electoral process, making it imperative for the State to investigate these connections thoroughly to ensure compliance with campaign finance laws.

A thorough examination of Women of Warren and The Papasian Library for Equality and Inclusion is essential for the State to assess whether their actions during the Pride event were independent or influenced by the City of Warren and the events participating candidates. This investigation will help ensure that all parties are held accountable for their roles in the alleged misuse of public resources for political gain.

VI. Consideration of Endorsements by Mayor Stone and Implications for Candidates

The State should take into account that Mayor Lori Stone has publicly endorsed candidates of her party, specifically Mike McFall and Christina Hines, who are running against established opponents in competitive races. These endorsements raise significant concerns about the potential misuse of public resources and the integrity of the Pride event:

- **Political Endorsements and Campaign Dynamics:** Mayor Stone's endorsement of Mike McFall in his campaign against James Fouts, the former Mayor of Warren, signifies a direct political alignment that warrants scrutiny. McFall is running in a newly drawn district that includes Warren, which contradicts the City's assertion that he already represents Warren. This misrepresentation is factually incorrect and misleading, as it suggests a level of incumbency that does not exist. Furthermore, the City's claim may be interpreted

as an attempt to position McFall as a presumed winner of an election that has not yet occurred, which could create an unfair advantage in a contested race.

- **Engagement with Hines' Campaign:** Similarly, Mayor Stone's active involvement with Christina Hines' campaign, including outright endorsements prior to the Pride event planning, indicates a potential overlap between official city functions and political campaigning. Such involvement raises questions about the impartiality of city resources being used in support of specific candidates in this case given the candidate also serves as the president of Women of Warren, acknowledged by the City as a cosponsoring and planning nonprofit of the event. If city officials engage in endorsements, it blurs the line between public service and political advocacy, especially when these candidates are running against established political figures like Macomb County Prosecuting Attorney Peter Lucido.
 - **Claims of Equal Access and Event Legitimacy:** Event organizers and the City of Warren assert that all political candidates had equal access to the Pride event. However, this claim lacks supporting evidence and conflicts with the event's characterization as a private function. There is no verification that all candidates and/or office holders were given the same opportunities for participation or visibility. The absence of documented equal access raises concerns about favoritism and the inappropriate use of public resources for political purposes.

The exclusion of established officeholders, such as Prosecutor Peter Lucido, from the Pride event highlights significant issues regarding equitable access to resources for vulnerable communities. Given that the event focused on a community that experiences hate crimes, Lucido's absence raises questions about potential bias in the planning and execution of this public event. His office has established a Hate Crime Unit that is dedicated to supporting victims, and their lack of involvement further underscores the need for inclusive engagement in events intended to serve marginalized groups.

The State must scrutinize Mayor Stone's endorsements and the implications of those endorsements during the Pride event. This examination is critical to uphold the principles of fairness, transparency, and accountability in the political process and to ensure that public resources are not misused to support specific candidates or agendas.

VII. There is a Nexus Between the City of Warren, Mayor Lori Stone, and Campaign Activities

In this matter a clear nexus exists between the City of Warren, Mayor Lori M. Stone, and the campaign activities connected to the Warren City Pride event. This nexus is evidenced by multiple factors that collectively indicate the misuse of public resources for political purposes, thereby contravening Section 57 of the Michigan Campaign Finance Act (MCFA).

- **Use of Public Resources:** The City of Warren's involvement in the Pride event included the use of city-owned social media platforms and official websites, as well as staff resources. These actions demonstrate a direct utilization of public resources to promote an event that served as a platform for political candidates. The intertwining of city support with political campaigning not only constitutes a violation of the MCFA but also undermines the integrity of the electoral process.
- **Promotion of Political Candidates:** The event in question was leveraged by specific political campaigns, including those of Mayor Lori Stone and other candidates. The failure of the City to provide sufficient evidence that their involvement was compliant with the MCFA raises serious concerns about the propriety of their actions. The promotion of political candidates through city resources signifies a misuse of public assets for private political gain, directly contradicting the prohibitions outlined in the MCFA.
- **Dual Roles and Conflicts of Interest:** Monica Papasian's dual role as a city official and President of The Papasian Library for Equality and Inclusion further complicates the matter. Her involvement with the Pride event, coupled with her position as a city appointee, creates a potential conflict of interest that warrants scrutiny. The actions taken by the Cultural Commission, which bears the city's

logo in promotional materials, suggest a reliance on public resources that blurs the lines between civic engagement and political campaigning.

- **Endorsements and Political Dynamics:** Mayor Lori Stone's endorsements of candidates such as Mike McFall and Christina Hines raise critical questions about the implications of public officials engaging in political advocacy during a public event. Her active involvement with candidates running in competitive races signals a potential misuse of public resources and creates an appearance of bias, thereby compromising the perceived impartiality of the event.
- **Lack of Documentation and Accountability:** The City of Warren's failure to provide supporting documentation for its statements further exacerbates the situation. Without affidavits, written responses, or public statements to substantiate the claims made by city officials, the reliability and authenticity of the City's defense come into question. This lack of transparency hinders the ability to assess the legitimacy of the City's actions and the compliance with the MCFA.

Given the aforementioned points, it is evident that there is a significant nexus between the City of Warren, Mayor Lori M. Stone, and the campaign activities associated with the Warren City Pride event. The intertwining of public resources with political endorsements and activities highlights serious violations of the Michigan Campaign Finance Act, necessitating thorough investigation and accountability for all involved parties.

VIII. Investigation of Public Resource Usage by the Warren City Council

The Warren City Council has initiated an investigation into the use of public resources for the recent Pride event (**EXHIBITS 5 & 6**), formally requesting clarification from the administration led by Mayor Lori M. Stone. While it is believed that the City Attorney has responded on behalf of the Mayor, this information remains undisclosed to the public, raising concerns about transparency.

Given the potential implications for compliance with the Michigan Campaign Finance Act (MCFA), it is essential for the State to seek any and all documents from the city attorney to the city council. The State should be interested in how responses to the city council align with responses to the MCFA complaint.

IX. False and Misleading Statements by Warren Officials and Destruction of Records

The complainant raises serious concerns regarding false and misleading statements made by Warren officials leading up to and following the Pride event. These statements pertained to the alleged use of public resources in connection with the event, suggesting that such usage was appropriate and aligned with city policies. However, the complainant contends that these assertions may have been made with knowledge of their inaccuracy, potentially intending to mislead the public and undermine scrutiny of the event's funding and organization.

The implications of these misleading statements are compounded by the apparent destruction of public records related to the event, particularly concerning the City's webpage that promoted the Pride event. The removal or alteration of official records, such as this webpage, raises concerns about the integrity of the information presented to the public and the potential obfuscation of the true nature of the event's funding and resources utilized. The actions taken by Warren officials in this context could be seen as an attempt to conceal pertinent details from public oversight, thereby obstructing transparency and accountability.

The comments made by Lorie W. Barnwell (**EXHIBIT 6**), the Treasurer of the City, on the post promoting the Pride event by the City of Warren raise significant concerns regarding transparency and accountability in the management of public resources. Barnwell's assertion that "no tax dollars are being used for this event" and that it is "resident-led" suggests a clear distancing of the city's involvement. However, the consistent inquiries from citizens, particularly from individuals like Jeff Smits, highlight a need for clarity regarding the true funding sources for the event, especially concerning utility costs and police presence.

As a founding member of Women of Warren (WOW), where she has been recognized for her planning efforts and has secured donations to support the group's past initiatives, Barnwell's statements regarding public resource allocation for the Pride event become increasingly problematic. Her dual role raises questions about the consistency of her messaging and the potential for conflicting interests. This contradiction further

emphasizes the need for transparency, as misleading public statements could erode trust in the city's handling of resources and its commitment to accountability.

X. Concerns Regarding Misrepresentation of Campaign Activities and Accountability

The complainant highlights significant issues concerning the statements made by the City regarding Christina Hines's involvement in the Pride event, particularly regarding the presence of campaign materials at the Women for Warren booth. It is crucial to scrutinize these claims, as they raise serious questions about the accuracy and integrity of the information provided by city officials in their response to the complaint.

The City asserts that Hines had no control over a campaign flyer placed in the Women for Warren booth, which was meant to promote membership in that organization. The response claims that Hines did not know nor authorize the inclusion of her campaign materials and that she acted promptly to remove the flyer upon discovering it **(EXHIBITS 7 & 8)**. However, the complainant points out that, on the day in question, Christina Hines's Committee to Elect (CTE) did report contributions **(EXHIBIT 9)**. This raises doubts about whether those contributions were a direct result of the event's QR code, as it is impossible for the complainant to ascertain the origins of these contributions without full disclosure from the campaign.

The following points warrant extreme scrutiny regarding the City's statements:

- **Control of Campaign Materials:** The assertion that Christina Hines had no prior knowledge of her campaign flyer being placed in the booth directly contradicts her responsibility as the president of Women for Warren. If Hines is actively involved in managing the booth, she should have been aware of all materials displayed, particularly those linked to her campaign.
- **Implications of Misrepresentation:** The response claims that the flyer was not displayed for the event's duration. However, the very presence of campaign materials, even for a brief period, can influence voters' perceptions and raise questions about the ethical use of public resources that were used in planning and execution of her event.

- **Culpability and Accountability:** The City’s defense hinges on the notion that no culpability should be imputed to Mayor Stone or the City because Hines allegedly acted without knowledge. This argument is troubling as it absolves officials from responsibility for ensuring that public events comply with campaign finance laws, irrespective of individuals' actions within their respective organizations.
- **Transparency and Reporting:** Given that the CTE reported contributions on the day of the event, it is essential to establish whether those contributions were made based on the event’s promotional efforts. The lack of clarity surrounding the funding sources and their connection to the event raises serious concerns about transparency and accountability.

The statements provided by city officials regarding Christina Hines's involvement and the presence of campaign materials during the Pride event appear contradictory and insufficiently substantiated. These inconsistencies necessitate a more thorough investigation to ascertain the true nature of the event and any potential violations of the Michigan Campaign Finance Act.

XI. Restrictions on Political Campaign Intervention by 509 (a)(2) Public Charity Organizations

Such organizations are strictly prohibited from participating in or intervening in political campaigns on behalf of, or in opposition to, any candidate for public office. This prohibition encompasses contributions to political campaigns and public statements made in favor of or against candidates.

The significance of this restriction is particularly relevant in the context of the Warren Pride Festival, a “community event” that involved the Papasian Library for Equality and Inclusion and Women for Warren, both of which are 509 (a)(2) public charities. The City’s response to the complaint must be scrutinized in light of this prohibition, especially considering that city resources were utilized for an event featuring political candidates.

The City claims that the event was purely celebratory and inclusive, yet the presence of political candidates complicates this narrative. Engaging in activities that could be

perceived as favoring specific candidates undermines the neutrality that 509 (a)(2) public charities must uphold. If the City indeed provided resources for this event, the following considerations must be evaluated:

- **Use of Public Resources:** The involvement of city resources in the Pride Festival raises questions about compliance with IRS regulations regarding 509 (a)(2) public charity organizations. Any resources allocated to support the event, particularly in the presence of political candidates, could be interpreted as a form of intervention in political campaigns, which is strictly prohibited.
- **Nature of Activities:** The City's assertion that the festival was solely a celebration of inclusivity fails to acknowledge the political implications of hosting candidates at a taxpayer-funded event. This invites scrutiny over whether the event's purpose aligns with the permissible activities of 509 (a)(2) public charity organizations. If the event featured partisan activities or promoted specific candidates, it would clearly violate the restrictions on political campaign intervention.

The statements made by the City regarding the Warren Pride Festival must be viewed with extreme scrutiny. The potential violation of restrictions on political campaign intervention, particularly concerning the use of public resources for an event featuring political candidates, highlights the urgent need for transparency and accountability in the management of public resources and compliance with applicable laws. It is crucial for this investigation to determine if all respondents acted independently of one another, as any coordinated action could further complicate compliance with these regulations. A thorough investigation is warranted to ensure adherence to these critical guidelines and to protect the integrity of both the City and the involved non-profit organizations.

XII. Subjectivity of the City's Characterization of the Pride Event

The City of Warren's characterization of the Pride Festival as a community event of "cultural and recreational value" is fundamentally subjective and appears to be an intentional effort to mitigate opposing views regarding the event's merit. By framing the event in this way, the City aims to navigate the complexities of public perception while attempting to satisfy the legal exemptions outlined in Section 57 of the relevant statutes.

This subjective framing allows the City to present the Pride Festival as a benign celebration of diversity, thereby attempting to downplay any political implications that may arise from the involvement of political candidates and the festival's advocacy components. In doing so, the City seems to be striving for a portrayal that aligns with its legal obligations while addressing potential criticisms regarding the appropriateness of public resources being used for an event that could be interpreted as politically charged.

XIII. The City's Responsibility for Compliance with the Michigan Campaign Finance Act

The City of Warren cannot absolve itself of its responsibilities under the Michigan Campaign Finance Act (MCFA) by delegating the organization of politically relevant events to nonprofit organizations, such as the Library for Inclusion and Women for Warren. The act clearly delineates the obligations of public bodies in the context of political activities, emphasizing the importance of maintaining strict neutrality and compliance with regulations concerning the use of public resources.

Relying on nonprofit organizations to host events that include political candidates or advocacy elements does not exempt the City from scrutiny regarding its involvement and the potential use of public resources. While these organizations may have their own legal obligations, the City retains a duty to ensure that its actions comply with the MCFA and do not constitute an unauthorized expenditure or contribution to political campaigns.

Attempting to distance itself from the political implications of the Pride Festival by asserting that it was organized independently by nonprofit entities does not shield the City from potential violations. The City's provision of public resources—such as venue space, logistical support, and other forms of assistance—constitutes a tangible involvement that may be interpreted as supporting the political activities occurring at the event. This involvement creates a direct connection between the City and the political elements of the festival, undermining any claims of separation from the political discourse.

Moreover, the MCFA mandates that public bodies remain neutral in electoral matters, and any indication of bias or support for specific political candidates or parties could

result in violations of the act. By enabling or facilitating an event that features political candidates, the City risks crossing the line into partisan activity, regardless of its characterization of the event as a community celebration.

In essence, the City's attempt to shield itself from MCFA compliance through the involvement of nonprofit organizations is not a viable defense. The legal responsibilities outlined in the act apply directly to the City, and it must be held accountable for its actions and decisions that pertain to the political context of events it sponsors or supports. This accountability is crucial to maintaining the integrity of the electoral process and upholding the public trust.

XIV. Incomplete Disclosure of Public Resources Utilized for the Event

The City of Warren may not have provided a complete and exhaustive account of the public resources utilized in relation to the Pride Festival. This omission raises significant concerns regarding transparency and accountability, particularly in light of the City's obligations under the Michigan Campaign Finance Act (MCFA).

First, the City has not disclosed the total amount of fees waived for the use of public facilities, nor has it clarified which city employees or officials communicated with the organizing bodies, specifically the Women of Warren and the Papasian Library for Equality and Inclusion. Such communications are critical for understanding the extent of the City's involvement in the event's organization and execution.

Additionally, there is a lack of information regarding who insured the event and whether the insurance coverage met the necessary legal requirements. The absence of this information could indicate potential liabilities for the City and further complicates the compliance landscape.

Furthermore, the City has not provided clarity on who authorized or instructed the creation of webpages on the official City of Warren websites, www.cityofwarren.org and www.miwarren.org, specifically promoting the event. The establishment of such digital resources could signify an endorsement of the event, which may have implications under the MCFA.

The creation of social media posts promoting the Pride Festival also lacks proper attribution. The City must disclose who authorized these posts and the rationale behind them. This information is essential to evaluate whether the promotional efforts align with the City's obligations to remain neutral in political matters.

Moreover, the authorization of the Warren Community Emergency Response Team (CERT) presence and vehicle usage during the event remains unclear. Questions arise regarding who approved this involvement and what resources were allocated for their participation.

The nature and extent of the police presence from the City of Warren during the event also require examination. It is crucial to determine who authorized this presence, what it entailed, and the costs associated with it. This information is vital to understanding the City's overall commitment of public resources to the Pride Festival and ensuring compliance with the MCFA.

The City's failure to provide a comprehensive account of the public resources utilized in connection with the Pride Festival raises significant questions about its transparency and adherence to legal obligations. A thorough investigation is necessary to illuminate these issues and ensure accountability in the management of public resources.

Given the potential violations of the MCFA, it is imperative for the state to seek an exhaustive list of all public resources utilized for the Pride Festival. This list should detail not only the financial expenditures but also the in-kind contributions made by the City. To accurately calculate the value of these resources, it is essential to include the market rates for services provided, such as facility usage, personnel hours, and any promotional efforts undertaken by the City. This comprehensive assessment will help determine whether the City's involvement in the event aligns with the legal framework governing campaign finance and ensure that public resources are managed in compliance with state laws.

XV. Use of Promotional Flyers Featuring City Logos

The promotional flyers for the Pride Festival, which prominently feature the City of Warren logo and/or the Cultural Commission logo, constitute a clear usage of public

resources. The City has not disclosed the identity of the individuals or entities responsible for creating these flyers, raising significant questions regarding compliance with the Michigan Campaign Finance Act (MCFA) and the appropriate allocation of public resources.

There are several reasonable theories regarding the creation of these promotional materials:

- **City Employee or Cultural Commission Member:** It is plausible that the flyers were designed by a member of the Cultural Commission or a City employee. If this is the case, the use of public resources in creating promotional materials for a politically charged event could violate the neutrality required by the MCFA.
- **Member of Papasian Library:** Alternatively, a member of the Papasian Library for Equality and Inclusion could have been involved in the flyer design. If the library utilized public resources for this purpose, it would raise similar concerns about compliance with campaign finance laws.
- **Member of Women of Warren:** Another reasonable assumption is that the flyers were created by a member of the Women of Warren. Notably, graphic designer Alex Kelley, who is believed to be affiliated with the organization, is also listed as a vendor in the campaign finance records of Lori Stone under the name ALEX DESIGN, LLC. The connection between Kelley and the promotional materials raises critical questions about the potential overlap of public resources and campaign efforts.
 - **Company Details (*EXHIBITS 10, 11 & 12*):**
Name: ALEX DESIGN, LLC
Entity Type: Domestic Limited Liability Company
Identification Number: 802492568
Date of Organization in Michigan: 08/10/2020
Resident Agent Name: ALEXANDRIA R. KELLEY
Address: 5685 Arden Ave, Warren, MI 48092-1149

Given the potential involvement of multiple parties in the creation of the promotional flyers, it is crucial to clarify who authorized their design and distribution. The absence of

transparency regarding these materials raises significant concerns about the use of public resources in a manner that may conflict with the MCFA.

The City of Warren must provide a complete accounting of the origins and funding of the promotional flyers to ensure compliance with campaign finance regulations. This includes identifying the individuals or organizations involved in their creation and clarifying whether public resources were improperly utilized in the process.

XVI. Use of Mayor Lori Stone's Campaign Sign

The claim that Mayor Lori Stone's campaign sign was used solely as an identification sign during the Pride Festival is not supported by the facts and raises significant legal concerns regarding the use of public resources for political purposes.

- **Modification of the Sign:** The assertion that Mayor Stone had the word "elect" cut from the sign to prevent its visibility is not a legitimate justification for the use of a campaign sign in an official capacity. While the front of the sign may not have displayed the word "elect," the presence of that word on the back indicates that the sign remains a campaign sign, regardless of its altered appearance. The fact that it could not be fully removed without damaging the integrity of the sign reinforces the argument that this was indeed a campaign sign being used for a public event.
- **Legal Ownership and Transfer:** The Mayor's campaign sign is, without question, property of Respondent 5, candidate Lori Stone and not Respondent 2, Mayor Lori Stone. There is no legal basis for transferring ownership of campaign materials for official use without proper authorization. The complainant sees no evidence of a legal means by which this property was altered or permitted to be used in an official capacity. The lack of a formal process for transferring campaign property into public use undermines the legitimacy of its presence at a city-sponsored event.
- **Intent of Use:** The argument that Mayor Stone intended to use the sign solely for identification purposes is contradicted by the circumstances of the event. The decision to remove "elect" from the front of the sign, while leaving it on the back,

does not alter the sign's original purpose as a campaign tool. It suggests an intent to obscure the campaign nature of the sign while still leveraging it for recognition at a public event, a clear violation of the Michigan Campaign Finance Act (MCFA) which prohibits the use of public resources for campaign purposes.

- **Social Media Context:** The claim that a social media post is from a personal account and does not depict a campaign endorsement is irrelevant to the central issue. The mere presence of a campaign sign at a city-sponsored event, regardless of the context of a social media post, constitutes an endorsement of a political figure using public resources.

The use of Mayor Lori Stone's campaign sign at the Pride Festival (**EXHIBIT 13**) raises serious legal questions regarding the use of public resources for political purposes. The city must address these concerns and provide clarity on the ownership and authorized use of such campaign materials in public events.

XVII. Concerns Regarding Potential Bias in the Investigation by the Secretary of State

On October 2, 2024, from 6:00 PM to 8:30 PM, at the White House Wedding Chapel located at 4860 E Thirteen Mile Rd, Warren, MI 48092, Women of Warren will host an open round table discussion featuring Secretary of State Jocelyn Benson, Mayor Lori Stone, City Council Member Angela Rogensues, and Jocelyn Howard. Moderated by Christina Hines, the event is said to address vital topics related to women in business and leadership, empowerment, and overcoming obstacles (**EXHIBIT 14**).

The complainant expresses significant concern regarding Secretary of State Jocelyn Benson's scheduled appearance at the upcoming Women of Warren event alongside Mayor Lori M. Stone and Christina Hines. The complainant views this situation as a potential conflict of interest that could bias the investigation into the usage of public resources for the Pride event.

Given the close associations between the individuals involved, the complainant believes that Secretary Benson's participation may undermine the impartiality of the inquiry and erode public confidence in the integrity of the investigation process. Therefore, the

complainant formally requests that this matter be referred to the Attorney General to ensure an independent and unbiased examination of the issues at hand, preserving the integrity of the investigation and safeguarding public trust in the electoral process.

XVIII. Concerns Regarding Potential Bias in the Investigation by the Attorney General

The complainant expresses significant concern regarding the potential bias in the investigation by the Attorney General, Dana Nessel. This concern is exacerbated by Nessel's active participation in the Pride event, alongside Christina Hines, as documented in the photographs included with the initial complaint. The complainant views this close association as a potential conflict of interest that could undermine the impartiality of the investigation into the usage of public resources for the event.

Additionally, the complainant points out that the City Attorney has spoken on behalf of the Attorney General in a seemingly misleading manner. In Doc. 4, page 19, the City Attorney's assertion regarding the proper use of public resources for promoting the Pride event was challenged by the complainant. The claim that Nessel's image is irrelevant because she was merely an event participant overlooks the broader implications of her involvement and the perception of her endorsement. The festival, attended by multiple public officials—including the Attorney General—raises serious questions about the delineation between personal and official capacities. Furthermore, the complainant emphasizes that the social media post from the Michigan Department of Attorney General, which promoted Nessel's participation in the Warren Pride Parade, is an official representation of the Attorney General's office. This posting serves as a public acknowledgment of her attendance and implicitly endorses the event's message. The characterization of her participation as personal is contradicted by this official communication, which reinforces the perception of her involvement as part of her role as Attorney General.

The complainant believes that Nessel's endorsement of Hines's campaign, coupled with her participation in politically significant events, necessitates an independent and unbiased examination of the issues at hand. The intersection of these events and actions highlights the urgency for state intervention to ensure the integrity of the

investigation, particularly concerning violations of campaign finance laws and the potential misuse of nonprofit resources for political gain.

Therefore, the complainant formally requests that this matter be referred to a special prosecutor to complete the investigation, ensuring accountability and preserving public trust in the electoral process.

XIX. Conclusion

The City of Warren's response to the Michigan Campaign Finance Act (MCFA) complaint raises more questions than it answers, revealing significant gaps in transparency and accountability regarding the use of public resources. Rather than effectively addressing the concerns raised, the City's assertions only deepen suspicions about compliance with the law.

The subjective characterization of the Pride Festival as a community event of cultural and recreational value lacks factual support, suggesting an attempt to frame the event in a way that fits within the exemptions outlined in Section 57 of the MCFA.

Furthermore, the reliance on nonprofit organizations, such as the Library for Inclusion, does not absolve the City from its responsibilities under the MCFA. The absence of a complete and exhaustive account of public resources used—coupled with the presence of campaign materials and potential conflicts of interest—underscores the need for a thorough investigation.

The continued use of campaign signs by Mayor Lori Stone and the ambiguous involvement of public officials during the event create a cloud of uncertainty around the integrity of the City's actions. This situation suggests a potential disregard for the strict neutrality expected of public bodies in electoral matters, as mandated by the MCFA.

Ultimately, the City has not effectively overcome the threshold of suspicion raised by the complaint; instead, it has illuminated a series of unresolved issues that necessitate further examination. It is imperative that the state seeks a comprehensive inquiry into the events and actions surrounding the Pride Festival to ensure compliance with the MCFA and uphold the principles of transparency and accountability in the management of public resources.

Respectfully Submitted,

Paul M. Kardasz

29539 Dover Avenue

Warren, MI 48088

(586) 495-7572

paul.kardasz1@gmail.com


EXHIBIT 1

cityofwarren.org/government/boards-and-commissions/cultural-commission/

Due to flooding, the pool at the Warren Community Center will be closed until further notice. The remainder of the community center is open.

71°F | f t

Search...



How do I? > Residents > Departments > Government > Resources

Home | Boards and Commissions | Cultural Commission

Cultural Commission

The Cultural Commission consists of nine members appointed by the Mayor, serving a three year term. The powers and duties of the Cultural Commission shall include:

- To act as an advisory commission to the Mayor and City Council;
- To consider, study and recommend plans for the development of city-wide cultural programs;
- To promote, coordinate and develop the performing and creative arts by making recommendations for programs for cultural opportunities and experiences for the citizens of the city, and further to facilitate communications with the state council for the arts.

Meetings:

The Cultural Commission meets every third Monday of the month (when needed) from September through June. Meetings are held at 5:45 p.m. at the Warren Community Center.

[WARREN CULTURAL COMMISSION 2023-2024 MEETING SCHEDULE](#)

Current Members:

Rhonda Barber
Shima Begum
Jeff Cutter
Elaine DePalma
Jon Oaks
Monica Papasian
Keri A. Pruse
Paula Wild

Boards and Commissions

- [Animal Welfare Commission](#)
- [Beautification Commission](#)
- [Board of Review](#)
- [Building Authority](#)
- [Civil Service Commission](#)
- [Commission on Disabilities](#)
- [Construction Board of Appeals](#)
- [Council of Commissions](#)
- [Crime Commission](#)
- [Cultural Commission](#)
- [Elected Officials Compensation Commission](#)
- [Election Commission](#)
- [Employee Retirement Board of Trustees](#)
- [Historical Commission](#)
- [Housing Commission](#)
- [International Property Maintenance](#)
- [Library Commission](#)
- [Parks and Recreation](#)

Name	Date Published	Resources
WARREN CULTURAL COMMISSION MEETING - SEPTEMBER, 16, 2024	09-04-2024	Agenda
CULTURAL COMMISSION Meeting - June 03, 2024	05-30-2024	Agenda Minutes
WARREN CULTURAL COMMISSION MEETING - DECEMBER 4, 2023	11-28-2023	Agenda Minutes
CULTURAL COMMISSION MEETING - SEPTEMBER, 18, 2023	09-11-2023	Agenda Minutes
Warren Cultural Commission Meeting - JUNE 5, 2023	05-22-2023	Agenda

EXHIBIT 2



WARREN CULTURAL COMMISSION	
	
MONDAY, SEPTEMBER 16, 2024	
WARREN COMMUNITY CENTER	
CONFERENCE ROOM "A"	
5:00 P.M.	
AGENDA	
CALL TO ORDER	Jeff Cutter
ACCEPTANCE OF AGENDA	Jeff Cutter
SECRETARY'S REPORT	Paula Wild
FINANCIAL REPORT	Jeff Cutter
OLD BUSINESS	
Thomas H. Carey Concerts at the Square	Jon and Monica
Juneteenth	Jon and Monica
Pride	Jon and Monica
NEW BUSINESS	
Yearly Calendar	Jeff Cutter
Reappointment –Monica,	Jeff Cutter
Commission Vacancies- 2	Jeff Cutter
Jeanne O. Busse Artist-In-Residence Program	Jeff Cutter
Special Concerts	Jeff Cutter
Restaurant for December meeting(Malone's?	
Announcements	
ADJOURNMENT	

EXHIBIT 3

of warren envision a new city 5123

News Your Community Calendar E Editions Contents Legal Notices Galleries Classifieds Advertise



Women of Warren show off their new vision for the city with a vision board from left, Rebecca Zainos, Monica Papasian, Alex Kelley and Rochelle Kelley. Diversity and inclusion, economic prosperity, education, community, and revitalization of the downtown are some of the things the Women of Warren are envisioning for the city. Photo by Corey Johnson

Women of Warren envision a new city

By Corey Johnson | Warren Weekly | Published March 25, 2024

WARREN — In keeping with Women's History Month, the Women of Warren shared their vision board for the city at the March 25 City Council meeting.

A vision board is a collection of pictures that exemplify the goals and the desires of those who created it. The presentation included the group's goals for Warren: diversity and inclusion, economic prosperity, education, building community, and a revitalized downtown that is walkable and uniquely reflective of Warren.

"We also want to bring other cultures, nationalities and diversity into the city," said Rebecca Zainos, one of the group's board members, as she explained to view of inclusion. "We want to expand our horizons outside the box."

Many neighboring communities have website downtowns, but Warren residents want to downtown to exemplify their community, according to Rochelle Kelley, the group's treasurer.

"We don't want to make a new Royal Oak or a new Ferndale. We want to make a downtown Warren, where people from Royal Oak, Ferndale and Birmingham, (who) have their quaint downtowns that everybody enjoys visiting, (and) want them to come here and visit us," Rochelle Kelley said. "I know they have been working on a downtown for a long time, but without the help of the community, that downtown can't be."

The Women of Warren do a vision board every year at the beginning of the year.

"To set the tone and envision the future we want for the year going forward," said Alex Kelley, the group's graphic designer and a member of its communications team. "This is central to our mission because it is thinking of ways we can improve ourselves and therefore the community."

Women of Warren Vice President Heather Zielinski further explained the importance of their vision board.

As women we have to be able to explain to the city what we need from them and the way to do that is by visualizing our needs," Zielinski said. "That way, they have a decision to make about how they are going to help us achieve the goals we need to raise our families in the city of Warren."

Zielinski continued, "I think it is very important to be able to have that (the vision board) to look forward and set your goals and to then look backwards and to say, 'I have achieved all of these things.'"

According to its members, the Women of Warren is open to any woman who is a Warren resident.

"For me it's about empowering and uplifting, and the energy when this group of women get together is just dynamic and so supportive," said Monica Papasian.


Papasian, who has been a member since the group's inception three years ago, has been bringing her now 9-year-old daughter Olive to the meetings.

"She (Olive) gives great ideas," Zainos said.

"The Pajama Jam event that we did last year was Olive's idea," said Rochelle Kelley.

"It was wildly successful," Alex Kelley said.

The group celebrated its one-year anniversary as a 501(c)(3) nonprofit in January and talked about starting a Junior Women of Warren for young girls but has no immediate plans to do so.



Advertisement: Believe and Become OPEN HOUSE OCT 27-14 PM REGINA HIGH SCHOOL CLICK HERE FOR MORE INFO

Papasian identified as member of Women of Warren

<https://www.candgnews.com/news/women-of-warren-envision-a-new-city-5123>

Women of Warren Vice President Heather Zielinski further explained the importance of their vision board.

"As women we have to be able to explain to the city what we need from them and the way to do that is by visualizing our needs," Zielinski said. "That way, they have a decision to make about how they are going to help us achieve the goals we need to raise our families in the city of Warren."

Zielinski continued, "I think it is very important to be able to have that (the vision board) to look forward and set your goals and to then look backwards and to say, 'I have achieved all of these things.'"

According to its members, the Women of Warren is open to any woman who is a Warren resident.

"For me it's about empowering and uplifting, and the energy when this group of women get together is just dynamic and so supportive," said Monica Papasian.

Papasian, who has been a member since the group's inception three years ago, has been bringing her now 9-year-old daughter Olive to the meetings.

"She (Olive) gives great ideas," Zainos said.

"The Pajama Jam event that we did last year was Olive's idea," said Rochelle Kelley.

"It was wildly successful," Alex Kelley said.

The group celebrated its one-year anniversary as a 501(c)(3) nonprofit in January and talked about starting a Junior Women of Warren for young girls but has no immediate plans to do so.

EXHIBIT 4

WARREN CITY COUNCIL
REGULAR MEETING
July 9, 2024
Page 16

Curtiss Ostosh
Jerry Bell
Kamilla Kestio
Joel Vanderlinden
Jocelyn Howard
Gloria Sankuar

Meeting Minutes as they appear in City Council July-23-2024 - epacket

https://www.cityofwarren.org/wp-content/uploads/2024/07/City-Council-Meeting-%E2%80%93-July-23-2024-epacket_compressed.pdf

16 COUNCIL RESPONSE TO AUDIENCE (optional)

With regard to the Pride Event on June 29, 2024, Council requests:

- 1) All contracts, agreements, memorandums, invoices, checks and list of waived fees.
- 2) A clear explanation of what the Cultural Commission Sponsorship meant and how it came about, why did they sponsor this event?
- 3) What policy exists for our commissions and for vendors renting out our facilities? Who has oversight of these events?
- 4) Who was the true sponsor of the event?
- 5) How does this compare to other events held at city hall since the beginning of the year, including inauguration of state official Mia Xiong (permits, fees, contracts, agreements, set-up, tear down, etc.), the National Day of Prayer Event (permits, fees, contracts, etc.) and the upcoming Bengali Festival (permits, fees, contracts, etc.). There are allegations that not everyone is being treated the same.
- 6) For future events there needs to be a clear policy on how things are to be handled and properly billed.
- 7) Who was responsible for the event and who should be held accountable? The flyer and Facebook posts said with the support of the Warren Cultural Commission and included the city logo. Did the organizers of the event take out an insurance bond with us? Did we get any proceeds from the vendors? Were there any fees charged at all? Were we paid anything for the event? Who paid for the use of city property, as well as city amenities? Who paid for set up, break down and rubbish removal? Who covered the cost of police presence? Who vetted out the vendors and policed the areas where sexually explicit items were displayed and sold?

Motion:

Motion to send the above request to the administration for answers was made by Council Member Moore and support motion made by Council Member Lafferty.

Roll Call:

A roll call vote was taken on the motion. The motion carried (7-0).

Council Member Moore Yes

WARREN CITY COUNCIL
REGULAR MEETING
July 9, 2024
Page 17

Council Member Lafferty Yes
Council Member Dwyer Yes
Council Member Newman Yes
Council Member Boike Yes
Council Member Magee Yes
Council Member Rogensues Yes

17 ADJOURNMENT

With regard to the Pride Event on June 29, 2024, Council requests:

- 1) All contracts, agreements, memorandums, invoices, checks and list of waived fees.
- 2) A clear explanation of what the Cultural Commission Sponsorship meant and how it came about, why did they sponsor this event?
- 3) What policy exists for our commissions and for vendors renting out our facilities? Who has oversight of these events?
- 4) Who was the true sponsor of the event?
- 5) How does this compare to other events held at city hall since the beginning of the year, including inauguration of state official Mia Xiong (permits, fees, contracts, agreements, set-up, tear down, etc.), the National Day of Prayer Event (permits, fees, contracts, etc.) and the upcoming Bengali Festival (permits, fees, contracts, etc.). There are allegations that not everyone is being treated the same.
- 6) For future events there needs to be a clear policy on how things are to be handled and properly billed.
- 7) Who was responsible for the event and who should be held accountable? The flyer and Facebook posts said with the support of the Warren Cultural Commission and included the city logo. Did the organizers of the event take out an insurance bond with us? Did we get any proceeds from the vendors? Were there any fees charged at all? Were we paid anything for the event? Who paid for the use of city property, as well as city amenities? Who paid for set up, break down and rubbish removal? Who covered the cost of police presence? Who vetted out the vendors and policed the areas where sexually explicit items were displayed and sold?

EXHIBIT 5

<div> <div>Calendar Pending Matters</div> <div> Council Calendar of Pending Matters as it appears in City Council July-23-2024 - epacket </div> <div> https://www.cityofwarren.org/wp-content/uploads/2024/07/City-Council-Meeting-%E2%80%93-July-23-2024-epacket_compressed.pdf </div> </div>				
Warren City Council Requests for Information				
Meeting Date	Request	Requestor	Responding Department	Due Date/Status
6/25/2024	All Outside Legal Service Contracts and agreements	Rogensues	Attorney	7/9/2024
6/25/2024	List of all vacant positions both union and non-union	Boike	Controller	7/23/2024
7/9/2024	Report on the Pride Event from June 29, 2024 and policy on use of city facilities	Council	Mayor	7/23/2024

EXHIBIT 6


City of Warren
 June 5 · 🌐

Join us for Warren's first ever Pride event on Saturday, June 29 at Warren City Hall!

 Festivities include food trucks, live entertainment, and more!

 Visit the Facebook event page for all of the details:
<https://www.facebook.com/share/zUyfKgwpKxPcRgv2/>



WARREN CITY PRIDE

**SATURDAY
JUNE 29 2024
11:30AM-6PM**

WARREN CITY HALL
1 City Square, Warren, MI 48093

Everyone is welcome to celebrate and support the LGBTQIA+ Community
Join us as we celebrate Warren's First LGBTQIA+ Pride with an all-day free family-friendly celebration

With Support From


**11:30AM-12:00PM
PRIDE PARADE**

**12:00PM-6:00PM
FESTIVITIES AND ENTERTAINMENT**

- Live Music
- Drag Shows
- Food Trucks
- Kid Activities
- Event Shirts
- Local Vendors
- Special Presentations
- Drag Story Time
- Special Guest Magician Paul Kobranis
- LGBTQIA+ Education and Resources

**8:00PM-12:00AM
ADULT AFTERGLOW AT KUHNHENN BREWING**
5919 Chicago Rd, Warren, MI 48092
• Food Trucks and Fun Times

HELP WARREN CITY PRIDE


SPECIAL GUEST
 **ATTORNEY GENERAL DANA NESSEL**

SPECIAL GUEST
 **TRANS DAY OF VISIBILITY FOUNDER RACHEL CRANDALL CROCKER**

More info:   
[@warrencitypride](https://www.facebook.com/warrencitypride)
warrencitypride@gmail.com
[warrencitypride.com](https://www.warrencitypride.com)

 **FB Event**

City of Warren
 Government organization

 **Send message**


 Joey Brown, Laurie Artz and 326 others


695 🗨️ 124 ➦

 Like

 Comment


 Share

All comments ▼



Lorie W. Barnwell
 FROM THE TREASURER OF THE CITY:

No tax dollars are being used for this event! This is resident lead. No need to complain or be unkind.


16w Like Reply 35 🗨️


Susan Procida-Boshears
Lorie W. Barnwell who decided this for the city this year?


16w Like Reply


Michal Jerzy
Susan Procida-Boshears you can apply to have a festival or event through the city for anything.


16w Like Reply 7 🗨️


Jeff Smits
Lorie W. Barnwell I have no problem with the event. I just don't want to pay for it. Have people donated actual money to the event to cover things like, electricity and water used during the event? Are people voluntarily helping set up for the event? Or are the parks and rec maintenance workers setting up and monitoring the event? Who's cleaning up after it? And are they being paid by people donating? Or are our tax dollars going to that as well? Do you see where I'm going with this? I don't see any possible way this is not using any tax dollars. I personally prefer my tax dollars to go toward other things. Like maintaining the parks. The lgbtq community doesn't bother be at all. And I'm fine with the event. But with taxes as high as they are and inflation out of control, I don't agree with any spending by the city at all that doesn't go towards maintaining the city and keeping it a safe. You can have the event once a month. I'm sure a lot of people would enjoy it. But I'm sure people are more concerned now than ever about where there tax dollars are going. But, if city employees pay and utilities are not covered by donations, then tax dollars are being spent.


16w Like Reply 2 🗨️


Jeff Smits
Lorie W. Barnwell as the treasurer obviously trying to assure people that we are not paying for this event, I expect by your statement above, you will be making 100% sure that our tax dollars are not being spent on any part of this event. And that you ... See more

16w Like Reply


Jeff Smits
Lorie W. Barnwell I would really like a response from you confirming that the people who are having the event are covering all of the costs involved with the event including police presence, utilities, and any set up and cleanup that city workers are i... See more

15w Like Reply


Lorie W. Barnwell
Jeff Smits- No City resources are going toward the event, no set up clean up etc. Sponsors are funding this. Parks and Rec are not involved at all. This isn't paid for by the city nor are city resources used.

15w Like Reply Edited

EXHIBIT 7

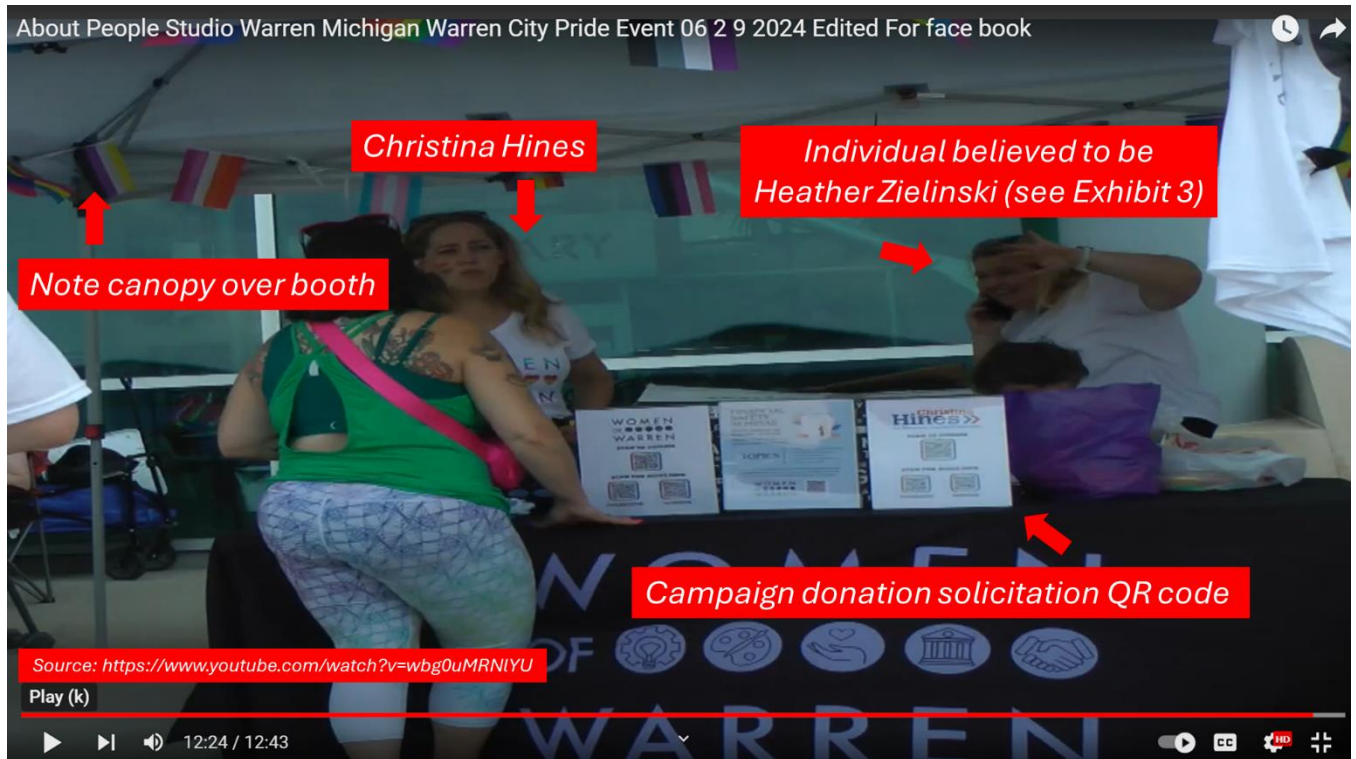


EXHIBIT 8

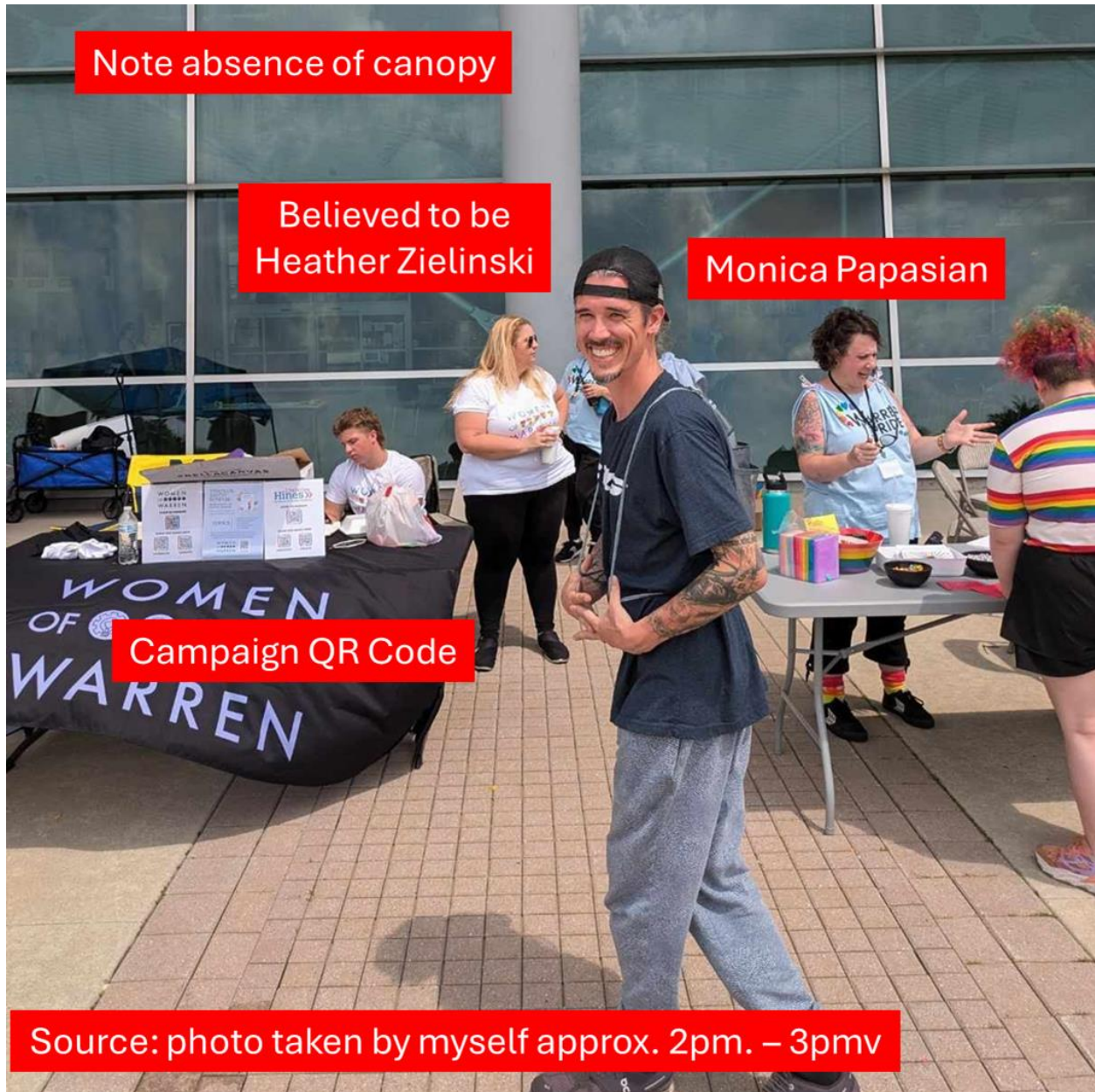


EXHIBIT 9

macomb.mi.campaignfinance.us/iContributions4.php?iSearchType=10&iCommitteeID=13727&iCommitteeVisibleID=140291&strCmteName=

	Direct	HINES	WARREN, MI 48092		Election
07/02/24	\$15.00	CTE CHRISTINA HINES	JENNINGS, BRIAN 4924 KELSCH LN CINCINNATI, OH 45227	CITY OF DAYTON	Pre-Election Stmt - 08/06/2024 Primary Election
07/01/24	\$100.00	CTE CHRISTINA HINES	VEALE, JENI 2982 LAYTON DR DAVIS, CA 95618	NOT EMPLOYED	Pre-Election Stmt - 08/06/2024 Primary Election
06/30/24	\$20.24	CTE CHRISTINA HINES	TIRSELL, DAVID 292 JONES ST MT CLEMENS, MI 48043	NOT EMPLOYED	Pre-Election Stmt - 08/06/2024 Primary Election
06/30/24	\$1000.00	CTE CHRISTINA HINES	YALMANCHI, ANITHA 2042 HICKORY TRAIL DR ROCHESTER HILLS, MI 48309	SIEMENS PLM	Pre-Election Stmt - 08/06/2024 Primary Election
06/29/24	\$10.00	CTE CHRISTINA HINES	MCMILLAN, ANN 30073 LORRAINE AVE WARREN, MI 48093	NOT EMPLOYED	Pre-Election Stmt - 08/06/2024 Primary Election
06/29/24	\$250.00	CTE CHRISTINA HINES	SILLS, CLAUDIA 120 HAWTHORNE ST BIRMINGHAM, MI 48009	FIRST HOLDING	Pre-Election Stmt - 08/06/2024 Primary Election
06/29/24	\$1000.00	CTE CHRISTINA HINES	ARCHER JR, DENNIS 151 W CONGRESS ST DETROIT, MI 48226	ACA	Pre-Election Stmt - 08/06/2024 Primary Election

EXHIBIT 10



MICHIGAN DEPARTMENT OF STATE
BUREAU OF ELECTIONS

ITEMIZED EXPENDITURES
SCHEDULE 1B
CANDIDATE COMMITTEE

1. Committee I. D. Number 140265
2. Committee Name CTE LORI STONE MAYOR

3. Name and address of person or vendor to whom paid	4. Purpose (Required Information)	5. Date	6. Amount
Expenditure #1 Name ALEX DESIGN LLC Address 5685 ARDEN AVE WARREN, MI 48092 <input type="checkbox"/> Fund Raiser	Purpose: <u>CAMPAIGN GRAPHIC DESIGN</u> <input type="checkbox"/> Check box if this expenditure is payment of debt or obligation reported on previous statement	<u>01/03/2023</u> Date	<u>\$ 450.00</u>
Expenditure #2 Name ORIGINAL PRINT SHOPPE Address 270 S TELEGRAPH RD PONTIAC, MI 48341 <input checked="" type="checkbox"/> Fund Raiser	Purpose: <u>PRINT CAMPAIGN FUNDRAISER INVITES & STICKERS</u> <input type="checkbox"/> Check box if this expenditure is payment of debt or obligation reported on previous statement	<u>01/10/2023</u> Date	<u>\$ 373.12</u>
Expenditure #3 Name CAROLYN BROWN Address 11521 BRIARCLIFF DR WARREN, MI 48093 <input checked="" type="checkbox"/> Fund Raiser	Purpose: <u>FUNDRAISER CATERING DEPOSIT</u> <input type="checkbox"/> Check box if this expenditure is payment of debt or obligation reported on previous statement	<u>01/16/2023</u> Date	<u>\$ 500.00</u>

EXHIBIT 11

← → ↺ 🌐 candgnews.com/news/women-of-warren-envision-a-new-city-5123

outside the box.”

Many neighboring communities have walkable downtowns, but Warren residents want its downtown to exemplify their community, according to Rochelle Kelley, the group's treasurer.

"We don't want to make a new Royal Oak or a new Ferndale. We want to make a downtown Warren, where people from Royal Oak, Ferndale and Birmingham, (who) have their quaint downtowns that everybody enjoys visiting, (we) want them to come here and visit us," Rochelle Kelley said. "I know they have been working on a downtown for a long time, but without the help of the community, that downtown can't be."

The Women of Warren do a vision board every year at the beginning of the year.

"To set the tone and envision the future we want for the year going forward," said Alex Kelley, the group's graphic designer and a member of its communications team. "This is central to our mission because it is thinking of ways we can improve ourselves and therefore the community."

Women of Warren Vice President Heather Zielinski further explained the importance of their vision board.

"As women we have to be able to explain to the city what we need from them and the way to do that is by visualizing our needs," Zielinski said. "That way, they have a decision to make about how they are going to help us achieve the goals we need to raise our families in the city of Warren."

Zielinski continued, "I think it is very important to be able to have that (the vision board) to look forward and set your goals and to then look backwards and to say, 'I have achieved all of these things.'"

According to its members, the Women of Warren is open to any woman who is a Warren resident.



You May Also Be Interested In



Samson Gash show
catapults DCC to 31-14
win over Warren De La
Salle in Boys Bowl
C&G Newspapers



Two dead, two Warren officers in critical condition after crash
Warren Weekly



Auto industry message
drives Trump town hall
Warren Weekly



Beautiful gardens
abound in Warren
Warren Weekly



'Forming Function'
podcast explores
curiosities behind
everyday design
C&G Newspapers




The Friday Five — Sept. 27-29
C&G Newspapers



Warren council wants

EXHIBIT 12

[LARA Home](#) [Contact LARA](#) [Online Services](#) [News](#)  [MI.gov](#)

LARA Corporations
Online Filing System
Department of Licensing and Regulatory Affairs

ID Number: 802492568 [Request certificate](#) [Return to Results](#) [New search](#)

Summary for: ALEX DESIGN, LLC
The name of the DOMESTIC LIMITED LIABILITY COMPANY: ALEX DESIGN, LLC

Entity type: DOMESTIC LIMITED LIABILITY COMPANY
Identification Number: 802492568

Date of Organization in Michigan: 08/10/2020

Purpose: All Purpose Clause

Term: Perpetual

The name and address of the Resident Agent:
Resident Agent Name: ALEXANDRIA R. KELLEY
Street Address: 5685 ARDEN AVE
Apt/Suite/Other:
City: WARREN State: MI Zip Code: 48092-1149
Registered Office Mailing address:
P.O. Box or Street Address: 5685 ARDEN AVE
Apt/Suite/Other:
City: WARREN State: MI Zip Code: 48092-1149


EXHIBIT 13



EXHIBIT 14


← → ↻ 📄 womenofwarren586.wixsite.com/women-of-warren/event-details/round-table?fbclid=IwY2xjawFoGWFlHRuA2FlbQlxMAABHY5K2N5xdX_9MnKHu-oxUzhSgqwTqdMYle-kBkJbZLT6qCHF1... ☆

WOMEN OF WARREN Women Empowering Women

Home Gallery Contact Us Events 

WOMEN OF WARREN JOIN OUR ROUND TABLE DISCUSSION FORUM

Join us in a conversation with some of the Women of Warren as they share their journeys to leadership. They will encourage you & share tips to empower others!





SPEAKERS

- SOS Jocelyn Benson
- Mayor Lori Stone
- Angela Rogensues
- Jocelyn Howard
- **Moderator:** Christina Hines

TICKETS

\$25 | Dues Paying Members
\$50 | Non-members
\$45 | Membership & Event Entry

UPDATES

Wed, Oct 02 | White House Wedding Chapel

Round Table

Open round table discussion with Jocelyn Benson and other experts about topics related to women in business and leadership, empowerment, and overcoming obstacles.

[Buy Tickets](#)

Macomb County Clerk / Register of Deeds Campaign Finance Reporting – Hines:

<https://macomb.mi.campaignfinance.us/iContributions4.php?iSearchType=10&iCommitteeID=13727&iCommitteeVisibleID=140291&strCmteName=>

Macomb County Clerk / Register of Deeds Campaign Finance Reporting – Stone:

<https://macomb.mi.campaignfinance.us/iCommitteeSearchProcess.php?strCandLastName=STONE&cmdSubmit=Search&strCandFirstName=&iOfficeID=-1&iJurisdictionID=-1>

About People Studio Warren Michigan Warren City Pride Event 06 2 9 2024 Edited For face book: <https://www.youtube.com/watch?v=wbq0uMRNIYU>

City of Warren Facebook promotion of event (Barnwell comments in this comment section):

<https://www.facebook.com/CityofWarren/posts/pfbid02yuKwHPabK9LjUt8gV22BBsznfU8DowctvprseiZUobMwsQExyYfeBqrudkgcvbcol>

Women of Warren envision a new city

By: Gena Johnson | Warren Weekly | Published March 29, 2024

<https://www.candgnews.com/news/women-of-warren-envision-a-new-city-5123>

Warren hosts city's first Pride celebration

By: Gena Johnson | Warren Weekly | Published July 12, 2024

<https://www.candgnews.com/news/warren-hosts-citys-first-pride-celebration-5996>

Warren Pride gets backlash for explicit content

By: Gena Johnson | Warren Weekly | Published July 12, 2024

<https://www.candgnews.com/news/warren-pride-gets-backlash-for-explicit-content-5995>

Backlash over vendors at Warren's Pride sparks investigation

By: Gena Johnson | Warren Weekly | Published September 22, 2024

<https://www.candgnews.com/news/backlash-over-vendors-at-warrens-pride-sparks-investigation-6540>

Warren Pride event is a first for the city

By Susan Smiley | ssmiley@medianewsgroup.com | Macomb Daily

PUBLISHED: June 7, 2024 at 12:41 p.m.

<https://www.macombdaily.com/2024/06/07/warren-pride-event-is-a-first-for-the-city/>

Warren Pride event raises concerns for some

By Susan Smiley | ssmiley@medianewsgroup.com | Macomb Daily

UPDATED: July 8, 2024 at 10:33 p.m.

<https://www.macombdaily.com/2024/07/08/warren-pride-event-raises-concerns-for-some/>

Warren City Council plans to address ethics complaints quickly

By Susan Smiley | ssmiley@medianewsgroup.com | Macomb Daily

PUBLISHED: July 14, 2024 at 10:36 a.m.

<https://www.macombdaily.com/2024/07/14/warren-city-council-plans-to-address-ethics-complaints-quickly/>

Warren to host its first-ever LGBTQIA+ Pride festival on June 29th

Posted 9:33 AM, Jun 29, 2024 (WXYZ)

<https://www.wxyz.com/entertainment/around-town/warren-to-host-its-first-ever-lgbtqia-pride-festival-on-june-29th>

Warren City Council Agendas, ePackets, Minutes and Videos

<https://www.cityofwarren.org/government/city-council/>

Warren Cultural Commission Agendas

<https://www.cityofwarren.org/government/boards-and-commissions/cultural-commission/>

Women of Warren Round Table Event:

https://womenofwarren586.wixsite.com/women-of-warren/event-details/round-table?fbclid=IwY2xjawFoGWFleHRuA2FibQIxMAABHY5K2N5xdX_9MnKHu-

[oxUzhSgqwTqdMYle-](#)

[kBkJbZLT6qCHF19AJ1DV13g_aem_xqgGL4k4DpZ58QoiN3LTFw](#)

MIWarren (City webpage) Warren City Pride June 29, 2024 Event:

<https://www.miwarren.org/warren-city-pride-june-29-2024/>

City of Warren (DELETED) website Pride event page

<https://www.cityofwarren.org/events/warren-city-pride-june-29-2024/>

Warren City Pride webpage:

<https://www.warrencitypride.com/>



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

October 18, 2024

Mary Michaels
Acting City Attorney
One City Square, Suite 400
Warren, MI 48093

Re: *Kardasz v. City of Warren et al*
Campaign Finance Complaint No. 24-068

Dear Ms. Michaels:

The Department of State has received a rebuttal to your response regarding City of Warren's 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 enclosed 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 Section
Bureau of Elections
Michigan Department of State

Attachment
c: Paul Kardasz



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

December 6, 2024

Mary Michaels
Acting City Attorney
One City Square, Suite 400
Warren, MI 48093

Re: *Kardasz v. City of Warren et al*
Campaign Finance Complaint No. 24-068

Dear Ms. Michaels

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

The complaint alleged that the City of Warren and Mayor Stone improperly used public resources by allowing city resources to be used for campaign purposes and endorsing candidates on official social media pages.

You responded to the complaint. In your response, you claimed the City of Warren's and Mayor Stone's actions were permitted under MCFA and some of Paul Kardasz's claims do not demonstrate the use of a public resource for a campaign.

Paul Kardasz provided a rebuttal statement. In that statement, Paul Kardasz continued his claims that the city's engagement in the event constituted a use of public resources to support those campaigning at the event.


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 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. Because the resources used for the event were for the event and not to further a political campaign, they do not fall within the actions covered by MCFA. Additionally, any activities that could be construed to appear as benefitting a campaign are permissible under MCL 169.257(1)(d) as there was no indication all candidates were not given an equal opportunity to be present at the event.

Because the violation of the MCFA alleged in the complaint has not been substantiated by sufficient evidence, 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.

Sincerely,

A handwritten signature in dark ink, appearing to read "James Biehl". The signature is written in a cursive, flowing style.

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