

Complainant:

Crystal Lecoq
734-276-2760
835 Bagley Ave. Ypsilanti, MI 48198
crystalr.forbes@gmail.com

Alleged Violator (Respondent):

Derrick Jackson
Committee ID: C-2022-103
PO Box 972111 Ypsilanti, MI 48197
info@jackson4sheriff.com

Allegations: I allege a violation of the MCFA 169.257 Contributions, expenditures, or volunteer personal services; prohibitions; communication referencing local ballot questions; violation as misdemeanor; penalty. Sec. 57. (1) A public body or a person acting for a public body shall not use or authorize the use of funds, personnel, office space, computer hardware or software, property, stationery, postage, vehicles, equipment, supplies, or other public resources to make a contribution or expenditure or provide volunteer personal services that are excluded from the definition of contribution under section 4(3)(a).

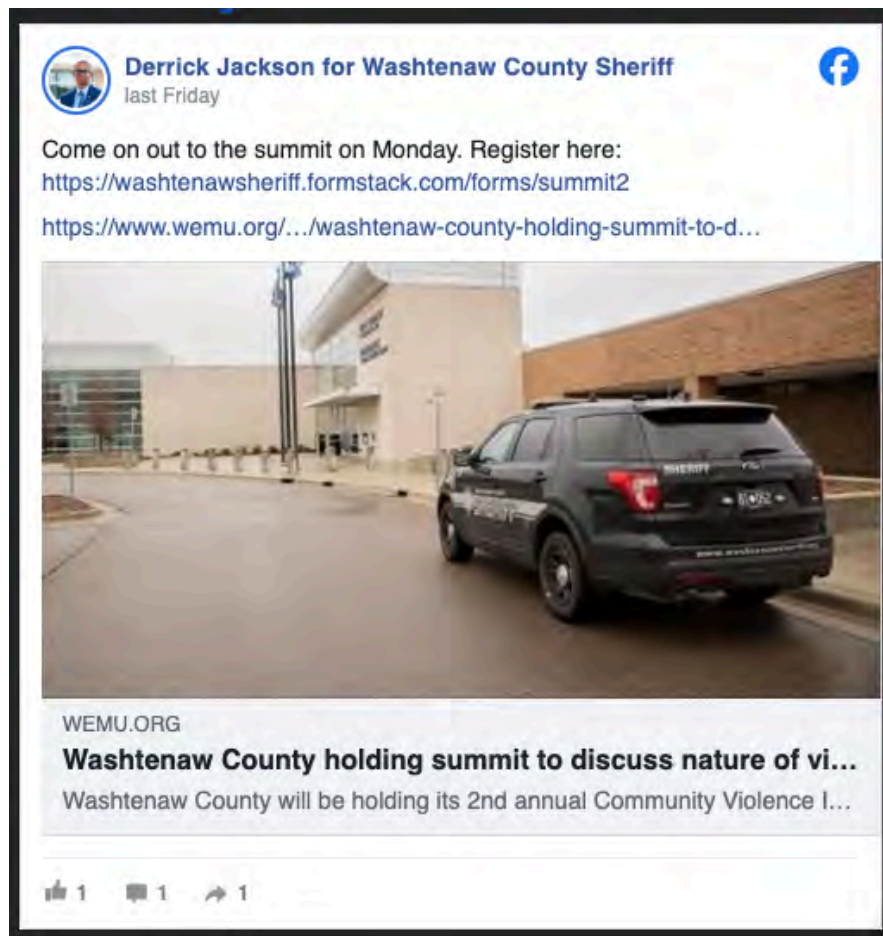
Below is documentation outlining 6 distinct types of MCFA 169.257 violations and multiple examples of the various violations committed by Candidate Jackson as part of his campaign for the office of Washtenaw County Sheriff.

Artifact 1: Community Violence Intervention Summit

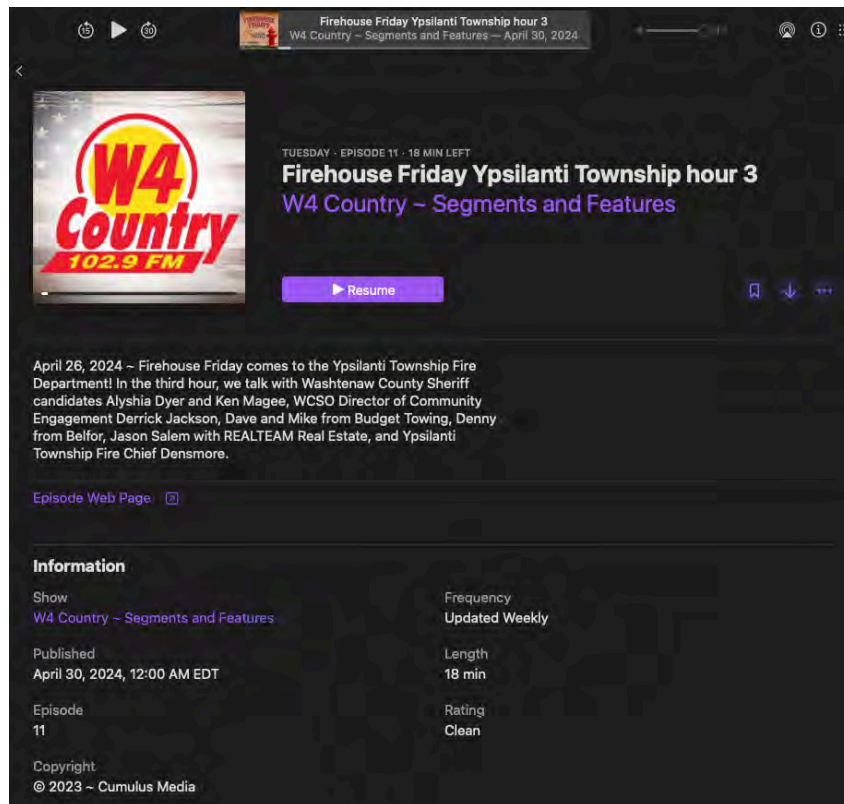
- a. Monday, April 29, 2024 Derrick Jackson for Washtenaw County Sheriff published a Facebook post (https://www.facebook.com/permalink.php?story_fbid=pfbid02H5MAJ7UzVTQyPsJSYnzRRbktjKscjJjKJ3pv9cGenVWVLJ2gkMpeDoeyT86ZsLYl&id=100086252263756) sharing the results of the 2024 Washtenaw County Community Violence Intervention Summit. This summit was sponsored and funded by the Washtenaw County Sheriff Department of which Candidate Jackson is currently employed as the Director of Community Engagement. As this event was held on a standard workday between the hours of 7:45 AM until 4:00 PM during what would presumably be Candidate Jackson's standard work hours it would appear that Candidate Jackson's attendance, participation, and subsequent publicization of this event on his campaign Facebook page is a violation of MCFA section 169.257



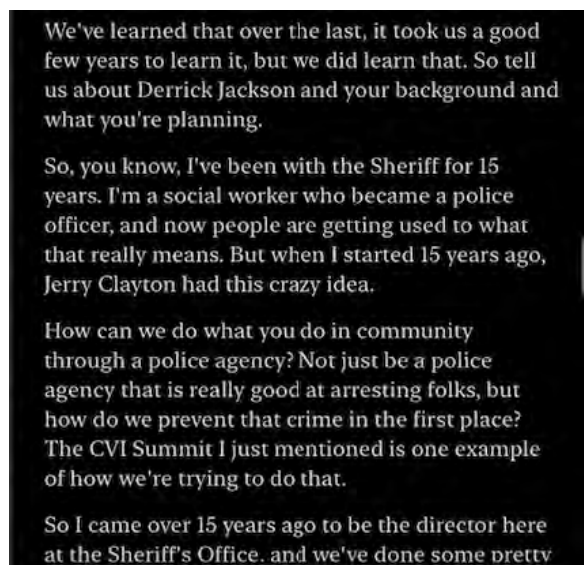
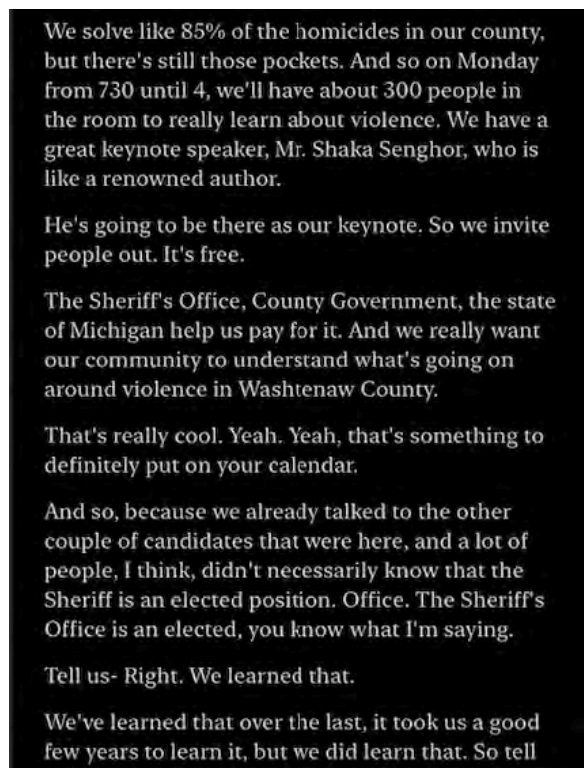
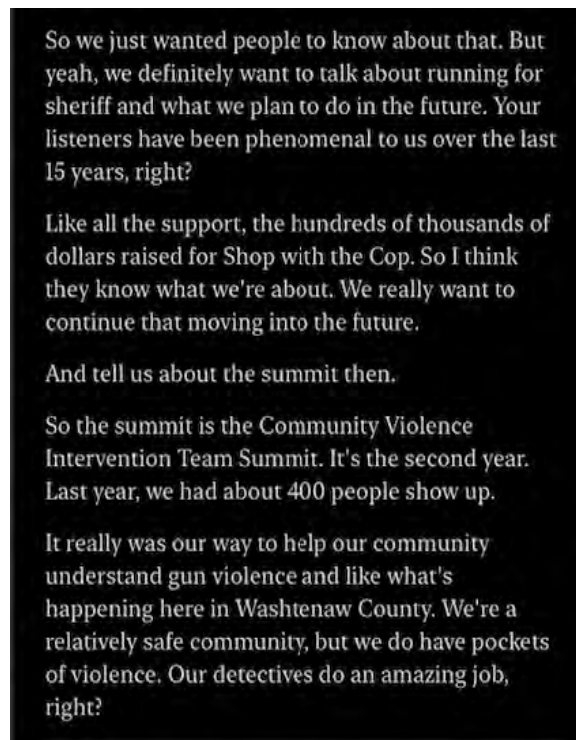
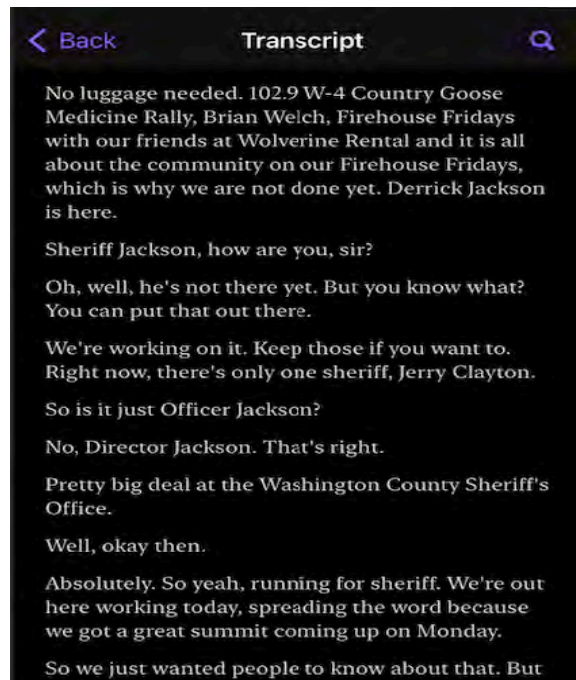
- b. Friday, April 26, 2024 Derrick Jackson for Washtenaw County Sheriff published a Facebook post (https://l.facebook.com/l.php?u=https%3A%2F%2Fwww.wemu.org%2Fwemu-news%2F2024-04-26%2Fwashtenaw-county-holding-summit-to-discuss-nature-of-violence-and-how-to-prevent-it&h=AT0016ntFS59GUpmDIYgS_9UqAGGJ8_-URJKaVCY3jxfJLW52i_IDU4-1PyhQMfwkV2YuprK2mNKeZ5oDlqkVAZgoGw770B3uPg9IASvVibtT7U_vvZhA9gnOaLXXktffL2fKQ&s=1) promoting the 2024 Washtenaw County Community Violence Intervention Summit. The post include a link to the event registration hosted on the Washtenaw Sheriff Formstack (https://washtenawsheriff.formstack.com/forms/summit2?fbclid=IwZXh0bgNhZW0CMTAAAR15A09HdaKLwaXvac3CkfGhYoL3Q-JzaJM_AFaRCNiIsUYjDYiV_jaRaCw_aem_AcdxXINKOtrxkJh_5V_BGjL1ta41qkMhNv7W74u5LzgD5dbU5GbUtiRZ03IPm2KFz3tnmLMQTE1OcCAiJSEZVADJd) and a link to a news piece by WEMU89.1 (https://www.wemu.org/wemu-news/2024-04-26/washtenaw-county-holding-summit-to-discuss-nature-of-violence-and-how-to-prevent-it?fbclid=IwZXh0bgNhZW0CMTAAAR3WMoK3W-tEXFXQpml-Ghht5M7emDwCTR6MgHnQgnA-Ms_wnhfc9rhC00_aem_Acfpyjbc6TPK41N-m9WbLR41XymrOAwWt4W0wdXdjvemujaq2Q3j5iKBNSAAFWUTZ5YKhDSSnTXY_RBZpk5PLItO) featuring a quote from Candidate Jackson where he is identified as the Sheriff's Office Director of Community Engagement. This post bolsters the argument made in Artifact 1 making it clear that Candidate Jackson's involvement in the event was performed under the auspices of his publicly funded position at the Washtenaw County Sheriff's Department and a violation of MCFA section 169.257



- c. Friday, April 26, 2024 Candidate Jackson appeared at W4country's Firehouse Friday at the Ypsilanti Township Fire Department located at 222 S. Ford Blvd wearing his Washtenaw County Sheriff Department uniform. His visit was purported to be an opportunity to publicize the 2024 Washtenaw County Community Violence Intervention Summit, his interview doubled as a campaign stop as documented in the transcript of the podcast shared by [W4Country - Segments and Features](https://podcasts.apple.com/us/podcast/firehouse-friday-ypsilanti-township-hour-3/id1742303208?i=1000654067706) on Apple Podcasts (<https://podcasts.apple.com/us/podcast/firehouse-friday-ypsilanti-township-hour-3/id1742303208?i=1000654067706>) and is a violation of MCFA section 169.257



The following screenshots of Candidate Jackson's conversation with the W4Country radio personalities further belies the campaign stop nature of his radio appearance:



So I came over 15 years ago to be the director here at the Sheriff's Office, and we've done some pretty phenomenal things. Jerry is the longest serving sheriff in our county's history. So with his full support, we want to continue that great work we've done.

I got a one-year-old and a two-year-old that I just dropped off at daycare. My wife, her head is spinning right now. If we were finished, if the Sheriff's Office was perfect, I'd be at home with them right now.

I wouldn't be out here doing this. So the issues are really important. I keep telling people that I feel like I discovered the secret, that I can't yell out enough for people to hear, that change within policing is possible.

And we do great work here in Washtenaw County. We have phenomenal staff. We are like the premier police agency in the state of Michigan right now.

And so that's what I want to continue.

Public Resources used in the three examples highlighted in Artifact 1:

- **County Personnel:** The Director of Community Engagement for the Washtenaw County Sheriff Department (Candidate Jackson)
 - **Public Employee Time:** The Community Violence Intervention Summit and two proceeding events publicizing the event were executed during a traditional administrative workday (Monday, Tuesday, Wednesday, Thursday, and Friday) during the course of a standard 8:00 AM to 5:00 PM work schedule
 - **Public Office Space:** office space inside a public building owned, maintained, or used exclusively by the Washtenaw County Sheriff Department was used for the radio interview and to create the online campaign media posts.
 - **Public Computer Hardware or Software:** a computer, cell phone, or portable device owned by Washtenaw County connected to a network paid for and maintained by Washtenaw County was used to plan and prepare the Summit. These were also used to cross-promote Candidate Jackson's political aspirations.
 - **Official County Uniform denoting authority:** The wearing of a uniform not proven to be purchased with personal funds in an advertisement for a political campaign is a violation of MCFA section 169.257
-

Artifact 2: Using Washtenaw County Sheriff Department programs on Campaign Facebook Page

- a. Friday, April 26, 2024 Derrick Jackson for Washtenaw County Sheriff published a Facebook post (<https://www.facebook.com/washtenaw.sheriff/posts/pfbid02rNHufUxAzm6tC7bGmUGXC5L4uhcTLmJXAPDsNfEj2kLQD646dbH64uUroCtX6gmQI>) promoting the Washtenaw Sheriff Reentry Program with the quote “This is what we do.” This post permits Candidate Jackson to leverage his contemporaneous, publically funded employment as the Director of Community Engagement for the Washtenaw County Sheriff Department and the logo of the Washtenaw County Sheriff department in his personal political campaign social media page and another violation of MCFA section 169.257.



Public Resources used in Artifact 2:

- **County Personnel:** The Director of Community Engagement for the Washtenaw County Sheriff Department (Candidate Jackson)
- **Public Employee Time:** the Community Violence Intervention Summit and two proceeding events publicizing the event were executed during a traditional administrative workday (Monday, Tuesday, Wednesday, Thursday, and Friday) during the course of a standard 8:00 AM to 5:00 PM work schedule
- **Public Office Space:** office space inside a public building owned, maintained, or used exclusively by the Washtenaw County Sheriff Department was used for the radio interview and to create the online campaign media posts.

- **Public Computer Hardware or Software:** a computer, cell phone, or portable device owned by Washtenaw County connected to a network paid for and maintained by Washtenaw County was used to plan and prepare the Summit were also used to cross-promote Candidate Jackson's political aspirations.

Artifact 3: Online Campaigning Using Washtenaw County Sheriff Department Resources

- Thursday, April 25, 2024 at 10:54 AM Derrick Jackson for Washtenaw County Sheriff published a Facebook post

(https://l.facebook.com/l.php?u=https%3A%2F%2Fsecure.actblue.com%2Fdonate%2Fwwjackson&h=AT0RphHYgOpTidAjhgBArJVZgLUQLY9h8h13QDzvUBB31wcHTIRtT4p2Pii5dvgNYP9sg307R5rGLDIOMQY_PbSDmzaTWFwieu8WP2wu_4UCiWDDxtnnRtXsbgE7d2FjizVYFA&s=1) sharing endorsements for his campaign with a direct link to his ActBlue political fundraising site (https://secure.actblue.com/donate/wwjackson?fbclid=IwZXh0bgNhZW0CMTEAAR2iSCkFLcR1FrhwbowPD_iLMJFDCm3nYFUF6NdajSIUyfS91kRVzvG12y4_aem_AceYudFyartBKxDeztK56ZakndpqK0CobSKfmbHIEGtHNbHtEbkhJlaavEAduyk-Xa4_KxKr9VILn666hqTMGmW)

Derrick Jackson for Washtenaw County Sheriff
April 25 at 10:32 AM · 🌐

We're building something special! Today I'm proud to announce the incredible support we have received from over 25 influential women leaders from right here in Washtenaw County. It is truly heartwarming to be endorsed by these remarkable leaders. These women serve as inspiring role models for my daughters and for all young women in our community. Learn more and join #TeamJackson at jackson4sheriff.com > >

WOMEN LEADERS SUPPORT JACKSON FOR SHERIFF

- State Senator Sue Shink
- State Rep. Felicia Brabec
- Former State Senator Alma Wheeler-Smith
- County Commissioner Shannon Beeman
- County Commissioner Caroline Sanders
- County Commissioner Katie Scott
- County Commission Crystal Lyte
- County Commissioner Annie Somerville
- Ypsilanti Mayor Nicole Brown
- Ann Arbor Councilmember Lisa Disch
- Ann Arbor Councilmember Ayesha Ghazi Edwin
- Ann Arbor Councilmember Jen Eyer
- Ann Arbor Councilmember Dharma Akmon
- Ann Arbor Councilmember Linh Song
- Ann Arbor Twp. Clerk Rena Basch
- Dexter Twp. Clerk Michelle Stamboulellis
- Pittsfield Twp. Supervisor Mandy Grewal
- Pittsfield Twp. Treasurer Patricia Tupacz-Scribner
- Pittsfield Twp. Clerk Michelle Anzaldi
- Pittsfield Twp. Trustee Linda Edwards-Brown
- Superior Twp. Treasurer Lisa Lewis
- Superior Twp. Clerk Lynette Findley
- Superior Twp. Trustee Rhonda McGill
- YCS School Trustee Celeste Hawkins
- YCS School Trustee M. Jeanice Townsend
- Former Ypsilanti Mayor Cheryl Farmer
- Former Ann Arbor Mayor & Senator Liz Brater

DERRICK JACKSON
DEMOCRAT FOR SHERIFF

SECURE.ACTBLUE.COM
Join our movement
Show your support with a contribution. [Learn more](#)

👍 16 3 shares

👍 Like 💬 Comment ➦ Share

- b. Tuesday, April 23, 2024 at 2:41 PM Derrick Jackson for Washtenaw County Sheriff published this Facebook post promoting his campaign speech at the UAW 1A CAP Conference (https://www.facebook.com/permalink.php?story_fbid=pfbid02xeqRTzFstnoYGKKtCiPEjEy2SxojzUWCffzt7pXz423MrpRapQ7LhMaGDhD3n877I&id=100086252263756)



- c. Friday, April 19, 2024 at 2:26 PM Derrick Jackson for Washtenaw County Sheriff published this Facebook post promoting two campaign endorsements (https://www.facebook.com/permalink.php?story_fbid=pfbid0t9VoKtiTaPo3VhBvJC5oK8fapdLj91grdoZ3Vo5HSUYArtQVowhE2EViyMnJB2vRI&id=100086252263756):



- d. Friday, April 12, 2024 at 1:00 PM Derrick Jackson for Washtenaw County Sheriff published this Facebook post promoting his campaign's IBEW Local 252 endorsement (https://www.facebook.com/permalink.php?story_fbid=pfbid0bB5RHNtsQvKpGC2dEy86PzMAHo neFr7GTjwTNNXbrhiiEvveQ2c5Rndq76Tig5K1I&id=100086252263756):



- e. Friday, April 12, 2024 at 8:35 AM Derrick Jackson for Washtenaw County Sheriff published this Facebook post promoting a campaign endorsement from the Library Board Trustee Aidan Sova (https://www.facebook.com/permalink.php?story_fbid=pfbid02XWE4APf4Rstb5QXpmpXKrFojuFh g4d4Psbpdzk7DoXKQbgpFuEovGvFYQBCpUygGI&id=100086252263756):



The persistent use of the public resources of Personnel, Time, Office Space, and Computer Hardware or Software to generate the aforementioned campaign posts is a violation of MCFA section 169.257.

Public Resources used in the examples documented in Artifact 3:

- **County Personnel:** The Director of Community Engagement for the Washtenaw County Sheriff Department (Candidate Jackson)
- **Public Employee Time:** All of the aforementioned social media posts were published on Candidate Jackson's campaign social media account during a traditional administrative workday (Monday, Tuesday, Wednesday, Thursday, and Friday) during the course of a standard 8:00 AM to 5:00 PM work schedule
- **Public Office Space:** office space inside a public building owned, maintained, or used exclusively by the Washtenaw County Sheriff Department was used for the radio interview and to create the online campaign media posts.
- **Public Computer Hardware or Software:** a computer, cell phone, or portable device owned by Washtenaw County connected to a network paid for and maintained by Washtenaw County was used to plan and prepare the Summit. These were also used to cross-promote Candidate Jackson's political aspirations.

Artifact 4: Campaign Videos filmed inside office space inside a public building owned, maintained, or used exclusively by the Washtenaw County Sheriff Department

- a. Saturday, September 23, 2023 Candidate Jackson for Washtenaw County Sheriff published a video filmed in an office space inside a public building owned, maintained, or used exclusively by the Washtenaw County Sheriff Department on the topic of gun violence (<https://fb.watch/rQMdyIYw-/>)



- b. Tuesday, February 6, 2024 Candidate Jackson for Washtenaw County Sheriff first published a campaign video filmed in an office space inside a public building owned, maintained, or used exclusively by the Washtenaw County Sheriff Department on his campaign Facebook page (<https://l.facebook.com/l.php?u=https%3A%2F%2Fyoutu.be%2FIClxa7Tvlrg%3Fsi%3DMnOdUlyoOj3jLFpW&h=AT07vi2LT3u6vqpfMI0W-4eeeMwQFfGUI6EUw-HGv-h68zoaVUK2Rs7uBd5963JButzDJJxDxkiL2TlxC1A1aJF0DP00FKnL-VSXfvpzRbPpWzISLtwVisca8dGTHminJVM6yA&s=1>)



The same video was also posted on the Derrick Jackson For Sheriff YouTube channel (<https://youtu.be/IClxa7Tvlrg?si=zLCcbWymE1pL6078>)



- c. Monday, March 24, 2024 Derrick Jackson for Washtenaw County Sheriff again published campaign video filmed in an office space inside a public building owned, maintained, or used exclusively by the Washtenaw County Sheriff Department on his campaign Facebook page (<https://www.facebook.com/shareypsi/posts/pfbid02xfvnjFSj1xCMgEVnyqgbGRKzathRtvR2W61ur5BeYa4wLbqo8N1s4g4ubkXxWWSol>)



- d. Thursday, April 11, 2024 at 11:31 AM Derrick Jackson for Washtenaw County Sheriff published a video to quote “set the record straight on immigration” on Facebook (<https://fb.watch/rQJGOGUphV/>)



The same campaign video was also posted on the Derrick Jackson For Sheriff YouTube channel (https://youtu.be/2961woNcbm4?si=ijVXDE_gbroRUCVZ)



Both video postings also include a link to the Washtenaw County Sheriff's Office General Order - Immigration Enforcement Reference Number: 1.14.GO published and hosted on Microsoft OfficeApps Servers owned and maintained by Washtenaw County ([1.14 Immigration Enforcement: 2023 revision: Final_202305191304567296.doc \(live.com\)](https://www.washtenaw.org/DocumentCenter/View/202305191304567296))

Home > Document Center > Sheriff's Office > Policy & Procedure

<https://www.washtenaw.org/documentcenter>

WASHTENAW COUNTY Michigan

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Your Government	Services	Live, Visit, Play	Business
Management	7.09.PG-Mobile Video and Audio Recording Devices	Feb 14, 2023	161
<ul style="list-style-type: none"> Criminal Justice Collaborative Council 	#cantwait memo	Jun 09, 2020	181
<ul style="list-style-type: none"> District Court 	9.10.PG GLEMIS Online Citizen Police Reporting System	Mar 15, 2022	118
<ul style="list-style-type: none"> Emergency Services 	Appearance Tickets	Apr 12, 2021	118
<ul style="list-style-type: none"> Equalization 	Consent to Search	Sep 10, 2021	38
<ul style="list-style-type: none"> Finance 	Corrections Emergency Response Trauma Sheets	Nov 01, 2023	108
<ul style="list-style-type: none"> GIS 	Debt Forgiveness of Jail Accounts	Feb 04, 2021	290
<ul style="list-style-type: none"> Health Department 	Domestic Violence	Sep 22, 2021	231
<ul style="list-style-type: none"> Human Resources 	General Order - Immigration Enforcement	May 19, 2023	99
<ul style="list-style-type: none"> Infrastructure Management 	LEADQ	Jul 11, 2022	559
<ul style="list-style-type: none"> Live, Visit, Play 			
<ul style="list-style-type: none"> MSU Extension 			
<ul style="list-style-type: none"> Parks & Recreation 			
<ul style="list-style-type: none"> Police Services 			
<ul style="list-style-type: none"> Steering Committee 			
<ul style="list-style-type: none"> Prosecuting Attorney 			
<ul style="list-style-type: none"> Public Defender 			
<ul style="list-style-type: none"> Risk Management 			

During his video monologue Candidate Jackson also disparages his opponents in the Washtenaw County Sheriff Election and states “that when I was asked to craft this policy many, many years ago” while the document linked in his campaign video does not include Derrick Jackson as the prepared by, issued by, or issuing authority of this document issued on May 8, 2023, barely one year ago.

1.14 Immigration Enforcement; 2023 revision; Final_202305191304567296 ✓

Accessibility Mode Download

Washtenaw County Sheriff's Office
General Order – Immigration Enforcement
Reference Number: 1.14 GO


Jerry L. Clayton, Sheriff

Subject:	Immigration Enforcement
Chapter:	Professional Standards
Status:	Revised
Compliance:	Class 2
Supersedes:	All Previous Directives
Standards Reference:	CALEA 1.1.4, 1.2.7, 1.2.9
Prepared by:	Kurt Schiappacasse, Commander
Issued by:	Mark A. Ptaszek, Undersheriff
Issuing Authority:	Jerry L. Clayton, Sheriff
Date of Issue:	May 8, 2023
Public Facing:	Yes

I. PURPOSE

A. To provide the Sheriff's Office policy position and basic procedures regarding immigration enforcement.

II. SCOPE

This General Order applies to all full and part-time Sheriff's Office employees who make or have investigative, enforcement, or custodial contact with individuals and the incarcerated population as a part of their assigned duties.

III. POLICY

A. The Sheriff's Office will comply with all requirements of federal immigration law that apply to local law enforcement agencies including but not limited to the treatment and rights of foreign nationals. (See [4.03RR Detention of Foreign Nationals](#))

The persistent use of the following public resources of Personnel, Time, Office Space, and Computer Hardware or Software to generate the aforementioned campaign posts is a violation of MCFA section 169.257.

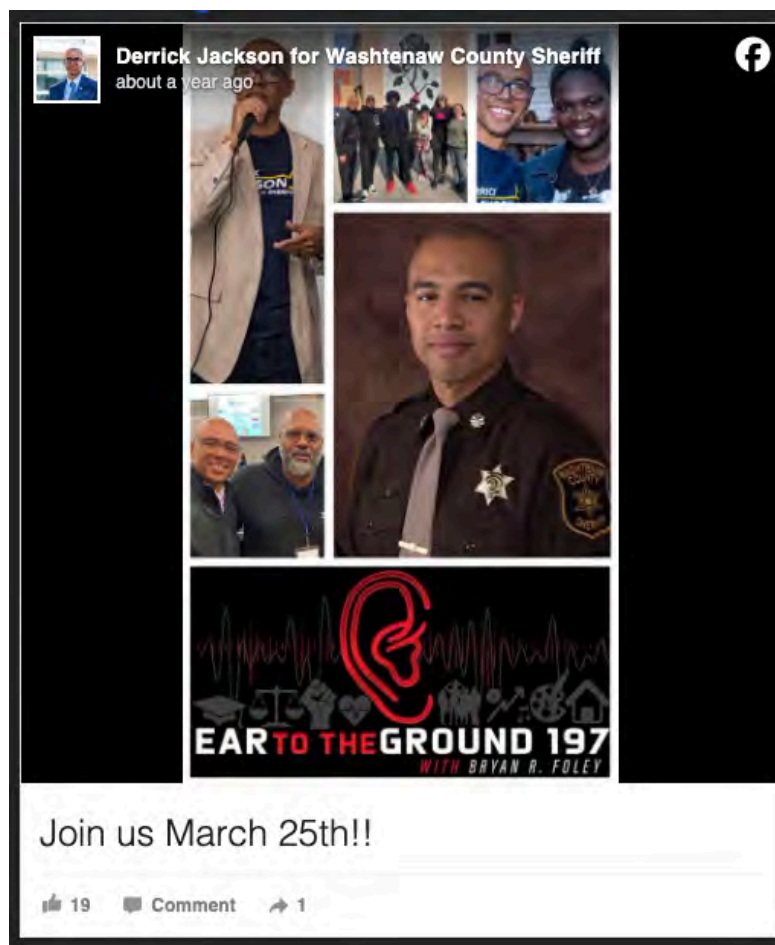
Public Resources used in the four examples highlighted in Artifact 4:

- **County Personnel:** The Director of Community Engagement for the Washtenaw County Sheriff Department (Candidate Jackson)
- **Public Employee Time:** the aforementioned social media posts were posted to Candidate Jackson's campaign account during a traditional administrative workday (Monday, Tuesday, Wednesday, Thursday, and Friday) during the course of a standard 8:00 AM to 5:00 PM work schedule

- **Public Office Space:** office space inside a public building owned, maintained, or used exclusively by the Washtenaw County Sheriff Department was use for the radio interview and to create the online campaign media posts.
- **Public Computer Hardware or Software:** a computer, cell phone, or portable device owned by Washtenaw County connected to a network paid for an maintained by Washtenaw County was used to plan and prepare the Summit were also used to cross-promote Candidate Jackson's political aspirations.
- **Washtenaw County Sheriff's Office work products and intellectual property.**

Artifact 5: Misuse of Washtenaw County Sheriff uniform in campaign event publications and public events

- Saturday, March 9, 2024 Derrick Jackson for Washtenaw County Sheriff published a campaign graphic featuring him wearing the official uniform and badge of the Washtenaw County Sheriff on Facebook
<https://www.facebook.com/bryan.foley2/posts/pfbid02WrYm6UGp9971Nhk9xfvNVWzfZQAS7rXxA9QxJDhkEzSAtsWTsK3u2y8fDBw1Nymyl>)



- b. Friday, April 26, 2024 Candidate Jackson appeared at W4country's Firehouse Friday at the Ypsilanti Township Fire Department located at 222 S. Ford Blvd wearing the official uniform and badge of the Washtenaw County Sheriff Department. Although his visit was executed as a guise to publicize the 2024 Washtenaw County Community Violence Intervention Summit, his interview doubled as a campaign stop as documented the transcript of his conversation with the media as documented in Artifact 1, Point c of this complaint.
- c. Friday, April 26, 2024 Candidate Jackson appeared at Ford Lake in Ypsilanti Township for the [EMU unveiling of their new rowing course](#) wearing the official uniform and badge of the Washtenaw County Sheriff Department where he was photographed and the picture was posted on Instagram (https://www.instagram.com/p/C6RXMoGrIMP/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==) tagging his campaign account [@jackson4sheriff](#) (<https://www.instagram.com/jackson4sheriff/>)



The use of the following public resources of personnel, time, and official Washtenaw County Sheriff Department uniform in conjunction with an individual political campaign is a violation of MCFA section 169.257.

Public Resources used in the three examples highlighted in Artifact 5:

- **County Personnel:** The Director of Community Engagement for the Washtenaw County Sheriff Department (Candidate Jackson)

- **Public Employee Time:** All of the events visited by Candidate Jackson were held during a traditional administrative workday (Monday, Tuesday, Wednesday, Thursday, and Friday) during the course of a standard 8:00 AM to 5:00 PM work schedule
 - **Official County Uniform denoting authority:** The wearing of the a uniform not proven to be purchased with personal funds in an advertisement for a political campaign is a violation of MCFA section 169.257
-

Artifact 6: Display of Official Law Enforcement Badge during Campaign Debate

Saturday, April 6, 2024 during a Monthly Meeting of the Washtenaw County Democratic Party featuring a panel of the democratic candidates for the office of Washtenaw County Sheriff Candidate Jackson displayed his official law enforcement badge to the assembled audience. Below is an account of this campaign indiscretion.

While Candidate Magee was standing with his back to the two other candidates making his closing remarks, Candidate Jackson removed his Washtenaw County Sheriff's Department Badge, an official symbol of government and the authority of the police, and prominently displayed it to the crowd of 100 plus federal, state, and local elected officials. He vigorously and comically waved the badge and elicited laughs from the audience in a clear attempt to sway public opinion and distract from the candidate that was earnestly addressing the crowd.

When Candidate Jackson's badge appeared, Candidate Dyer told him, "Put that shit away." to which Candidate Jackson flippantly replied "I just couldn't help myself."

This is an egregious violation of MCFA section 169.257.

Certification: 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.

Crystal Lecoq

May 7, 2024



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

June 5, 2024

Derrick Jackson
PO Box 972111
Ypsilanti, MI 48197

Re: *Lecoq v. Jackson*
Campaign Finance Complaint No. 24-041

Dear Mr. Jackson:

The Department of State (Department) has received a formal complaint filed against you by Crystal Lecoq alleging that you violated the Michigan Campaign Finance Act (MCFA or Act). Specifically, the complaint alleges that you used public resources to further your campaign for Washtenaw County Sheriff. A copy of the complaint is included with this notice.

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

The purpose of this letter is to inform you of the Department’s examination of these matters and your right to respond to the allegations before the Department proceeds further. It is important to understand that the Department is neither making this complaint nor accepting the allegations as true. The investigation and resolution of this complaint is governed by section 15 of the Act and the corresponding administrative rules, R 169.51 *et seq.* An explanation of the process is included in the Department’s campaign finance complaint [guidebook](#).

If you wish to file a written response to this complaint, you are required to do so within 15 business days of the date of this letter. Your response may include any written statement or additional documentary evidence you wish to submit. Materials may be emailed to BOERegulatory@michigan.gov or mailed to the Department of State, Bureau of Elections, Richard H. Austin Building, 1st Floor, 430 West Allegan Street, Lansing, Michigan 48918. If you fail to submit a response, the Department will render a decision based on the evidence furnished by the complainant.

A copy of your answer will be provided to Crystal Lecoq, 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: Crystal Lecoq

ATTN: Regulatory Section
Michigan Bureau of Elections
430 W. Allegan
Lansing, MI 48918

Dated: July 18, 2024

**Re: Lecoq v. Jackson
Campaign Finance Complaint No. 24-041**

To the Regulatory Section of the Michigan Bureau of Elections:

Please allow this letter to serve as a response to the allegations Mrs. Lecoq has made against my campaign, Elect Derrick Jackson Sheriff (the Campaign), in Campaign Finance Complaint No. 24-041 (the Complaint). As set forth in detail below, the Campaign has consistently adhered to state laws and regulations, and Mrs. Lecoq's allegations are not based in fact or actual evidence, but on her own conjecture and speculation. The Complaint alleges the Campaign violated the Michigan Campaign Finance Act (the Act) and cites various artifacts, each of which I have now addressed below. The Act states in relevant part:

Contributions, expenditures, or volunteer personal services; prohibitions; communication referencing local ballot questions; violation as misdemeanor; penalty.
Sec. 57.

- (1) A public body or a person acting for a public body shall not use or authorize the use of funds, personnel, office space, computer hardware or software, property, stationery, postage, vehicles, equipment, supplies, or other public resources to make a contribution or expenditure or provide volunteer personal services that are excluded from the definition of contribution under section 4(3)(a). This subsection does not apply to any of the following:
 - (a) The expression of views by an elected or appointed public official who has policy making responsibilities.
 - (b) Subject to subsection (2), the production or dissemination of factual information concerning issues relevant to the function of the public body.
 - (c) The production or dissemination of debates, interviews, commentary, or information by a broadcasting station, newspaper, magazine, or other periodical or publication in the regular course of broadcasting or publication.
 - (d) The use of a public facility owned or leased by, or on behalf of, a public body if any candidate or committee has an equal opportunity to use the public facility.
 - (e) The use of a public facility owned or leased by, or on behalf of, a public body if that facility is primarily used as a family dwelling and is not used to conduct a fund-raising event.
 - (f) An elected or appointed public official or an employee of a public body who, when not acting for a public body but is on the public official's or employee's personal time, is expressing the public official's or employee's personal views, is expending the public official's or employee's personal funds, or is providing the public official's or employee's personal volunteer services.

(g) If an individual who is contributing to a separate segregated fund affirmatively consents to the contribution, the use of public resources to establish and administer a payroll deduction plan to directly or indirectly collect a contribution to, or make an expenditure for, a committee. Affirmative consent does not expire until revoked by the individual who provides the affirmative consent.

(2) Except for an election official in the performance of the election official's duties under the Michigan election law, 1954 PA 116, MCL 168.1 to 168.992, a public body, or a person acting for a public body, shall not, during the period 60 days before an election in which a local ballot question appears on a ballot, use public funds or resources for a communication by means of radio, television, mass mailing, or prerecorded telephone message if that communication references a local ballot question and is targeted to the relevant electorate where the local ballot question appears on the ballot.

(3) A person that knowingly violates this section is guilty of a misdemeanor punishable, if the person is an individual, by imprisonment for not more than 1 year or a fine of not more than \$1,000.00, or both, or if the person is not an individual, by 1 of the following, whichever is greater:

(a) A fine of not more than \$20,000.00.

(b) A fine equal to the amount of the improper contribution or expenditure.

The Complaint identifies six (6) specific instances of conduct, none of which are prohibited under the Act either because the conduct falls within one of the exceptions delineated in the Act or because the conduct simply was not a use funds, personnel, office space, computer hardware or software, property, stationery, postage, vehicles, equipment, supplies, or other public resources with the purpose of making a contribution or expenditure or providing volunteer personal services to benefit the Campaign.

ALLEGATIONS

Artifact 1: Community Violence Intervention Summit

a. Monday, April 29, 2024 Derrick Jackson for Washtenaw County Sheriff published a Facebook post sharing the results of the 2024 Washtenaw County Community Violence Intervention Summit. This summit was sponsored and funded by the Washtenaw County Sheriff Department of which Candidate Jackson is currently employed as the Director of Community Engagement. As this event was held on a standard workday between the hours of 7:45 AM until 4:00 PM during what would presumably be Candidate Jackson's standard work hours it would appear that Candidate Jackson's attendance, participation, and subsequent publicization of this event on his campaign Facebook page is a violation of MCFA section 169.257

Artifact 1(a): Contrary to Ms. Lecoq's representations, the Community Violence Intervention Summit (the Summit) is a work function that falls squarely within the scope of my duties at the Washtenaw County Sheriff's office. As the Director of Community Engagement, I am responsible for coordinating the Community Violence Intervention Team. The Summit is an annual event put on by the Community Violence Intervention Team. The event is open to the community and at no cost for admission. My involvement in the event has no connection to the

Campaign and at no time during the Summit was there any mention of the Campaign. My attendance and participation in the Summit, a work event that occurred during work hours, does not violate the Act as this was not a Campaign event.

Ms. Lecoq included photos in her complaint alleging that the “subsequent publicization of this event” on the Campaign Facebook page was a violation of the Act. I took some of the photos Ms. Lecoq used in her complaint using my personal cell phone. Other Summit attendees took some of the other photos. The photos were intended to promote the event and the Community Violence Intervention Team. I posted photos from the Summit at the conclusion of my work day. Nothing in the Act prohibits the use of these photographs in this manner.

Artifact 1b: Next, Ms. Lecoq identifies a post from the Campaign’s Facebook page, made on Friday, April 26, 2024 (prior to the Summit), which included a registration link to the Summit through the Washtenaw County Sheriff Formstack and a link to a news piece by WEMU 89.1 which featured a quote I made relative to the Summit in my role as the Washtenaw County Sheriff’s Office Director of Community Engagement. The Campaign post promoted the Summit. The Campaign is not prohibited from promoting public events and this conduct is not violative of the Act. Even if Ms. Lecoq was alleging that I posted this information during work hours, which she did not specify in this “artifact”, I maintain I did not post this during work hours or while using a work phone or other electronic device. What Ms. Lecoq is alleging is that the post itself was created to promote the Campaign. This is obviously false. The post, which includes a registration link for the Summit and a link to an article created by an unrelated third-party entity to promote the Summit, are independent from the Campaign, made no reference to the Campaign, and conferred no benefit to the Campaign by way of any contribution as identified by the Act.

Artifact 1c: Last, relative to the Summit, Ms. Lecoq references a W4 Country radio interview I participated in on April 26, 2024 during work hours and while in uniform. Ms. Lecoq is correct that I attended the Firehouse Friday event in my professional capacity and as a representation of the Washtenaw County Sheriff. The interview request by W4 Country was an impromptu segment and I agreed as a way to advertise the summit. The interview summary, which was provided by Ms. Lecoq, was a description of the segment after it had been completed and not an advertisement that ran in advance of the segment.

Ms. Lecoq incorrectly stated the interview “doubled as a campaign stop as documented in the transcript of the podcast.” Ms. Lecoq did not identify any specific statements I made to promote the Campaign. It is true the radio show host asked about the Campaign while live on air. In reviewing the actual interview, I responded that I was “working today”, and that I was there “spreading the word” about the Summit. The radio co-host picked up on my reaction and discomfort in answering campaign related questions and asked me to discuss the Summit. I had no intention upon arrival of discussing the Campaign. The show was live on air which made it impossible to “rewind and redo.” The interaction surrounding the Campaign lasted no more than two minutes. I am unable to control the actions of third parties with whom I encounter during my workday. I am the Director of Community Engagement, and I am a candidate for Washtenaw County Sheriff. I go to great efforts to ensure there is not even the mere appearance of the type of

conduct Ms. Lecoq is alleging I partake in. I handled this interaction as best as I could, given the circumstances.

It is important to note the “transcript” Ms. Lecoq included is incomplete, and fails to identify a speaker for each statement. It is unclear whether Ms. Lecoq transcribed the interview herself or if she obtained it from another source and presented only the portions she found relevant. Irrespective of such, the transcript is an inaccurate transcription of the interview.

Conclusion: The Summit was a work event conducted during work hours. The event was not a Campaign event and did not promote or confer a benefit to the Campaign.

Artifact 2: Using Washtenaw County Sheriff Department programs on Campaign Facebook Page.

Much like the allegation in Artifact 1b, this allegation pertains to a publicly available social media post by the Washtenaw County Sheriff's Office acknowledging National Second Chance Month. The Campaign simply reshared this post to promote the message of Second Chance Month. The Campaign is not prohibited from promoting public events and this conduct is not violative of the Act. Even if Ms. Lecoq was alleging that I posted this information during work hours, which she did not specify in this “artifact,” I maintain I did not post this during work hours or while using a work phone or other electronic device. What Ms. Lecoq is alleging is that the post itself was created to promote the Campaign. This is obviously false. The post makes no mention of the Campaign.

Conclusion: The Campaign's sharing of a third-party's public social media post does not violate the Act. The Campaign published the post, and the post was not made by a public employee during public employee time in a public office space.

Artifact 3: Online Campaigning Using Washtenaw County Sheriff Department Resources

Ms. Lecoq has identified a series of social media posts from the Campaign Facebook page and claims to know the posts were made by me during a “traditional administrative workday (Monday, Tuesday, Wednesday, Thursday, and Friday) during the course of a standard 8:00 AM to 5 PM work schedule from a public office space using public computer hardware or software.” Ms. Lecoq has no actual knowledge of these claims, and she is merely speculating.

I have a campaign team that creates most of my social media posts and regularly updates the Campaign social media accounts. In fact, my campaign team does the bulk of my social media posting. Social media posts can be scheduled ahead of time and posted by individuals other than myself.

- **Artifact 3a**, this was published by a campaign staffer.
- **Artifact 3b**, I published. Contrary to Ms. Lecoq's presumptive allegation, I was not working for the sheriff's office while attending the event referenced in the subject post.

- **Artifact 3c**, this was published by a campaign staffer.
- **Artifact 3d**, this was published by a campaign staffer.
- **Artifact 3e**, this was published by a campaign staffer.

Conclusion: There was no Campaign use of Washtenaw County Sheriff Department Resources. The referenced posts were either published by a campaign staffer, an individual who is not county personnel, or by me, through the use of my personal electronic device, while I was not working – neither of which constitute a violation of the Act. None of the posts identified in the Complaint were published by county personnel, during public employee time, in a public office space, or through the use of public computer hardware or software.

Artifact 4: Campaign videos filmed inside office space inside a public building owned, maintained, and or used exclusively by the Washtenaw County Sheriff Department

Artifact 4(a): In this allegation, Ms. Lecoq presumes the videos posted to the Campaign Facebook page on Saturday, September 23, 2023, Tuesday, February 6, 2024, Monday, March 24, 2024, and Thursday, April 11, 2024 were recorded during public employee time, in a public office space – that being a space exclusively used, owned, or maintained by the Washtenaw County Sheriff, using a public computer hardware or software, and included prohibited use of the Washtenaw County Sheriff’s Office work products and intellectual property. Again, Ms. Lecoq has no actual knowledge of when the videos were made or where they were made. Her allegations are based on pure conjecture and speculation and are just false.

I made the subject videos outside of my work hours in my home office on my personal phone and/or computer. Ms. Lecoq has never been in my house, and so surely, she would not have known that and only assumed I was in my county work office. I have included images showcasing the clear distinction between my home and my county office, emphasizing the separation of the two locations. Ms. Lecoq herself included the website that directs the general public to the order referenced in some of the subject videos.

Home Office (where videos filmed) vs. Work Office:



Artifact 4(b): Ms. Lecoq also alleges a violation of the Act through the use of Washtenaw County Sheriff work product/intellectual property. The link referenced in this artifact and the general order she identified are not the sort of work product or intellectual property the Act prohibits use, nor is the way the information was used prohibited by the Act. The link and order are both public records and have been discussed at length during previous candidate forums.

Conclusion: There were no public resources used in making and publishing the subject videos. The videos were filmed in my home office using my personal devices and created and published during non-work hours, all of which is permitted conduct and not violative of the Act.

Artifact 5: Misuse of Washtenaw County Sheriff uniform in campaign event publications and public events

Ms. Lecoq alleges that the use of a uniform not proven to be purchased with personal funds in an advertisement for a political campaign violates the Act. Her interpretation of the Act is flawed, and yet even if this were a correct application of the rule, I maintain that I have not and do not use my sheriff's uniform to promote the Campaign.

Artifact 5(a): The Campaign shared a post created by a third-party (Bryan Foley – host of Ear to the Ground 197). The post promoted the Ear to the Ground and featured me as a guest. Again, to avoid even the appearance of impropriety, I contacted the third-party and requested that he not use photos of me in uniform when promoting the show in relation to the campaign. The issue was resolved as evidenced by subsequent posts announcing my appearance not including the uniform image.

Artifact 5(b): See explanation and conclusion as set forth above in addressing Artifact 1(c).

Artifact 5(c): This segment of the complaint references the publication of a social media image by a third-party (Washtenaw County Commissioner Katie Scott), and not the Campaign. The photograph published includes other county commissioners and me at an event I attended during work hours. It would have been appropriate for me to be in uniform during work hours. I did not post this to the Campaign Facebook page or share the image, nor did anyone else affiliated with the Campaign.

Conclusion: For the reasons set forth above as to each instance Ms. Lecoq has reported use of my sheriff's uniform, I maintain that I have not and do not use my sheriff's uniform in violation of the Act or to promote or confer a benefit to the Campaign.

Artifact 6: Display of Official Law Enforcement Badge During Campaign Debate

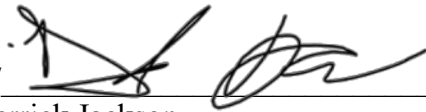
It is true that I displayed my law enforcement badge during a campaign debate. Ms. Lecoq's description of the event is however misleading. To provide some additional context, one of the other candidates represented to the debate attendees that I was not a police officer. I reacted by presenting my badge. I have now had to do the same with my college diploma, and other documentation in response to misstatements about my accomplishments.

Although I will be the first to admit the display of my law enforcement badge during a campaign debate may not have been the most appropriate response, it is not prohibited conduct under the Act. I am employed as an officer of the Washtenaw County Sheriff's Office. This is public knowledge, and my law enforcement badge is a symbol of my employment. When I present at a campaign event, I am a candidate for sheriff who currently works at the Washtenaw County Sheriff's Office. Nothing in the Act prohibits me from identifying my current profession or referencing my role at the Washtenaw County Sheriff's Office.

Conclusion: This display of my law enforcement badge during a campaign debate does not amount to the type of use or contribution of public resources prohibited by the Act.

CERTIFICATION: I certify that the information contained in this correspondence is true to the best of my knowledge, information, and belief.

Dated: July 18, 2024

/s/ 
Derrick Jackson



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

August 5, 2024

Crystal Lecoq
835 Bagley Ave.
Ypsilanti, MI 48198

Re: *Lecoq v. Jackson* Campaign Finance Complaint No. 24-041

Dear Crystal Lecoq:

The Department of State received a response from Derrick Jackson 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: Derrick Jackson

Department of State, Bureau of Elections
Richard H. Austin Building, 1st Floor
430 West Allegan Street
Lansing, MI 48918
BOERegulatory@michigan.gov

Re: Lecoq v. Jackson Campaign Finance Complaint No. 24-041

To: Regulatory Section
Bureau of Elections
Michigan Department of State

Please consider the the complainant rebuttal to the response received from Candidate Jackson with regards to Michigan Campaign Finance Complaint No. 24-041.

Artifact 1: Community Violence Intervention Summit

Artifact 1:a: The violation in the post identified in Artifact 1:a is twofold:

1. Repurposing of work performed in the execution of his public job as “director of community engagement” into content for his campaign’s social media account. this is net new campaign content crafted by Candidate Jackson using photos of an event made possible by public dollars. The post cited in Artifact 1:a is not a repost of content already produced by the Director of Community Engagement and shared to the public under the auspices of the Washtenaw County Sheriff’s Office, the public agency that hosted the event and for which Candidate Jackson works.
2. Candidate Jackson claims to have taken the photos used the post identified in Artifact 1:a with a personal cell phone. In the year 2024 with proliferation of unlimited data plans and the advent of BYOD (bring your own device) infrastructure management software it is increasingly rare for most professionals to carry multiple smartphones. Analysis of Candidate Jackson’s campaign finance reports do not include any expenditures for a campaign smartphone device or data plan.

In his rebuttal Candidate Jackson does not offer the telephone number, provider, contract number or other identifying details that would differentiate his personal cell phone from the cell phone connected to the 734-891-2243 line regularly publicized as the professional cell phone contact for the Washtenaw County Sheriff’s Department Director of Community Engagement.

Throughout the Sheriff’s campaign, Candidate Jackson repeatedly cited his exceptional availability to the community via text or calls at all hours of the day or night. Below are multiple publicly available documents indicating that 734-891-2243 is the appropriate channel for professional communications with Candidate Jackson when he is working in his professional capacity for Washtenaw County:

- July 2024 - <https://www.washtenaw.org/CivicAlerts.aspx?AID=2774>
- July 2023 - <https://www.washtenaw.org/CivicAlerts.aspx?AID=2508&ARC=5060>
- June 2020 - <https://www.facebook.com/washtenaw.sheriff/posts/recently-the-washtenaw-county-sheriffs-office-became-aware-of-allegations-made-b/2061777693966168/>
- July 2020 - https://www.ycschools.us/downloads/district_20-21/joint_ycs_statement_on_sro_contract_final.pdf
- June 2015 - https://www.wmlive.com/news/ann-arbor/2015/06/no_questions_gun_turn-in_progr.html

Until Candidate Jackson can provide the number for his “personal cell phone” and evidence of the date the current data contract associated with that number was initiated, and receipts, bank, or credit card statements indicating that this contract has been paid using personal or campaign funds since the inception of his campaign for Sheriff in 2022, the justification provided in his rebuttal is not sufficient and the social media post cited in Artifact 1:a continues to constitute a violation of Section 57 of the Michigan Campaign Finance Act: *(1) A public body or a person acting for a public body shall not use or authorize the use of funds, personnel, office space, computer hardware or software, property, stationery, postage, vehicles, equipment, supplies, or other public resources to make a contribution or expenditure until otherwise proven.*

Artifact 1:b:

Despite the fact that the appointed role of Director of Community Engagement, held by Candidate Jackson inside the Washtenaw County Sheriff’s since 2009, is a job without a clearly defined scope of influence and responsibility and a position not traditionally found in most policing organizations. Throughout the course of the sheriff’s campaign, Candidate Jackson struggled to clearly articulate the nature of his role and the value it provides to Washtenaw County residents. Candidate Jackson has consistently reiterated that a Director of Community Engagement is far more than that of a public relations officer.

That being said, Section 57 does carve out exceptions for “The production or dissemination of debates, interviews, commentary, or information by a broadcasting station, newspaper, magazine, or other periodical or publication in the regular course of broadcasting or publication.”. In that case, I will retract my accusation of Candidate Jackson violating the spirit of the statute in Artifact 1:b where his campaign’s social media account shared posts specifically crafted or informed by Candidate Jackson when executing his nebulous professional role of director of community engagement.

Artifact 1:c:

As implied by the dialogue of the radio hosts throughout the entirety of the broadcast and description of the recording on Apple Podcasts (<https://podcasts.apple.com/us/podcast/firehouse-friday-ypsilanti-township-hour-3/id1742303208?i=1000654067706>) used to support the initial complaint and this rebuttal, it is clear that the Washtenaw County Sheriff's race was an obvious topic selected by the hosts and producers of W4 Country in their advance planning and execution of the remote broadcast.

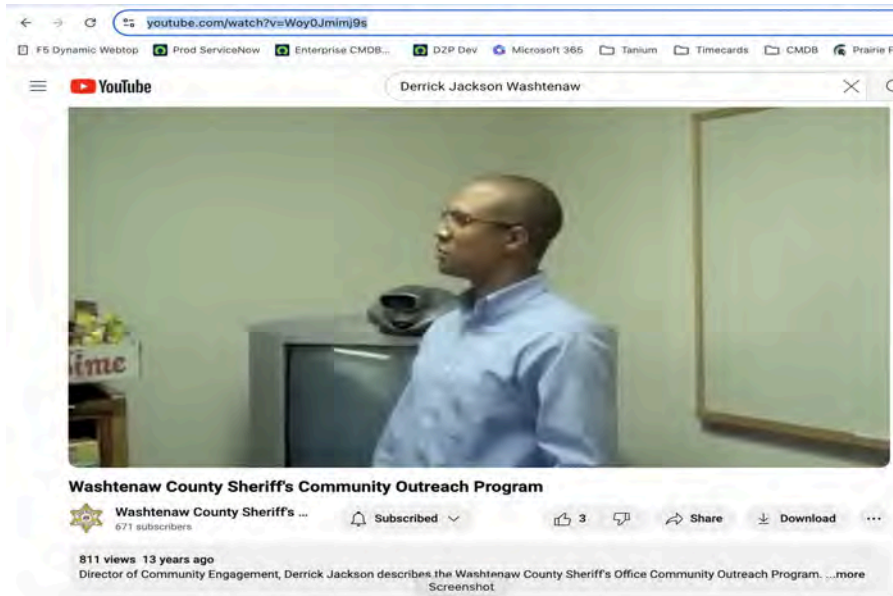
Candidate Dyer and Candidate Magee were invited to be in attendance for this broadcast and both were interviewed specifically about their resumes, campaigns and thoughts on the sheriff's race at the beginning of the aforementioned recording. At the time of the W4 Country Radio Interview in April 2024 Candidate Jackson had been engaged in a three way race for office with Alyshia Dyer and Ken Magee for nearly 20 months since his campaign committee was formed in August 2022.

Even in the unlikely event that Candidate Jackson was wholly unaware of the invites extended to his election challengers, their obvious presence at the event in their campaign attire (Alycia with her yellow and black campaign button, Ken with his blue and yellow 'Magee for Sheriff' t-shirt) should have inspired even the most junior communications staffer or first time candidate for public office to remind their interviewers of the importance of the delineation between work in service to the public and campaign activities.

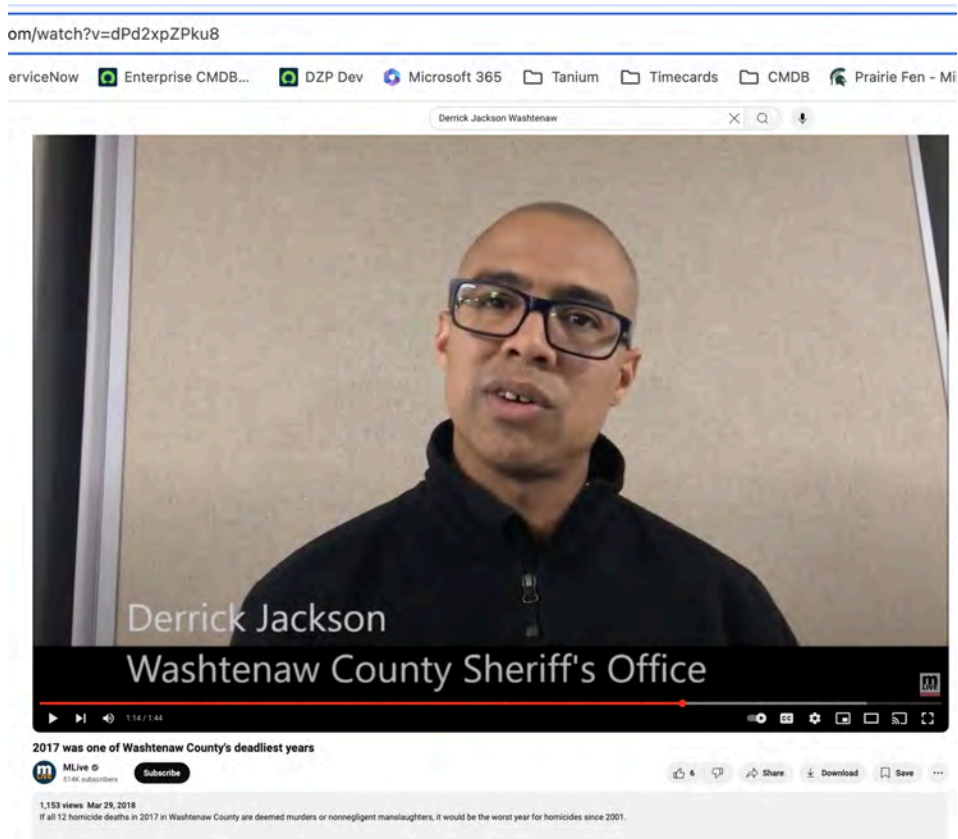
It is incredibly disingenuous for Candidate Jackson to frame his media appearance that day as a traditional "work day". It has been observed in the Washtenaw County community that Candidate Jackson does not normally don the official Sheriff's uniform in the course of his work as the Director of Community Engagement as he frequently appears in televised news segments and print media in his official capacity dressed in business casual or sportswear attire.

Please see the following examples of Candidate Jackson's professional attire when representing the Washtenaw Sheriff's Department from 2010 through 2023 as documented below:

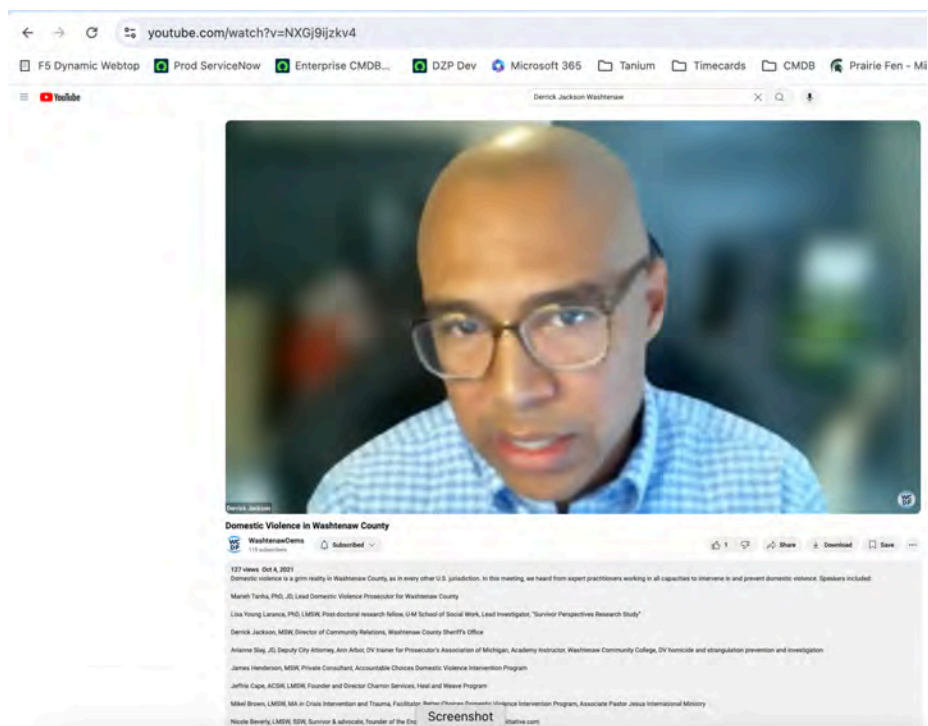
- August 2010: <https://www.youtube.com/watch?v=Woy0Jmimj9s>



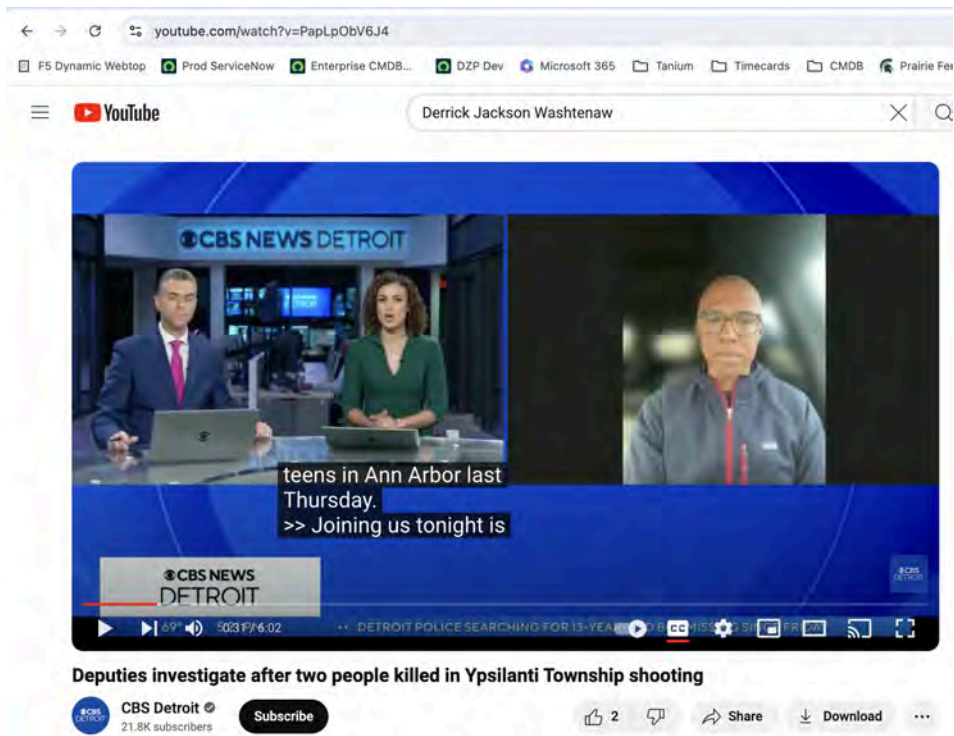
- March 2018: <https://www.youtube.com/watch?v=dPd2xpZPku8>



- Oct 2021 - <https://www.youtube.com/watch?v=NXGj9ijzkv4>



- July 2023: <https://www.youtube.com/watch?v=PapLpObV6J4>



Irrespective of Candidate Jackson's specific fashion choices, a prudent and rules-minded candidate should err on the side of campaign propriety and opted for something less obvious and denoting of legal authority than the universal uniform of law enforcement.

Someone campaigning on their 15+ years of media relations and law enforcement experience should have been able to stop the live interview before it careened into campaign finance violation territory or, at the very least, requested the media outlet edit the campaign-related portions of the interview out of any podcasts or transcripts published by W4 Country Radio.

At the time of the writing of this rebuttal, the un-edited interview is still available in its entirety online. In my initial complaint I included screenshots of a transcript of the interview as available online via Apple Podcasts. To further illustrate the disingenuous nature of the response provided by Candidate Jackson, Adobe Web Services Transcript Functionality was used to create the following transcript of Candidate Jackson's portion of the podcast.

The segment with Candidate Jackson begins at 8 minutes, 30 seconds into the recording and lasts approximately 4 minutes. Candidate Jackson gives the details of the upcoming Summit in the first minute of the interview followed by an extensive review of his 15 year career at the Sheriff's department, his background, his family, and caps off the segment with the date of the upcoming election. The highlighted quotes below make

it difficult to believe that these are the words of an uncomfortable professional.

8:30

Radio Host: Derek Jackson is here. Sheriff Jackson, how are you, sir?
Oh, running for sheriff.

Candidate Jackson: *Oh, well, not there yet, but you know what, you can put that in there if you want to.*

Radio Host: OK, fair enough.

Candidate Jackson: Right now there's only one sheriff, Jerry Clayton.

Radio Host: So, so is it just Officer Jackson?

8:44

Candidate Jackson: Director Jackson

Radio Hosts: Pretty big deal at the Washington County Sheriff's Office.
OK then. But, hoping to be sheriff.

Candidate Jackson: *Absolutely. So yeah, running for sheriff.* Uh, we're out here working today, spreading the word. We got a great summit coming up, uh, on Monday, so we just wanted people to know about that. But, uh, but yeah, we definitely want to talk about running for sheriff and what we plan to do in the future. Your listeners have been phenomenal to us over the last 15 years, right, like all the support, the hundreds of thousands of dollars raised for shop with a cop. So I think they know what we're about. We really want to continue that, uh, moving into the future.

9:18

Radio Host: And tell us about the summit then.

Candidate Jackson: So the summit is the community violence intervention Team summit. It's the 2nd year. Last year we had about 400 people show up. It really was our way to help our community understand gun violence and like what's happening here in, in Washington County.

Uh, we're a relatively safe community, but we do have pockets of violence. Our detectives do an amazing job, right? We solved like 85% of the homicides in our county, but there's still those pockets. And so, on Monday, uh, from 7:30 until 4, we'll have about 300 people in the room to really learn about violence, uh, we have a great keynote speaker, Mr. Shaka Senghor, who's like a, you know, renowned author. Uh he's gonna be there as our keynote. So we invite people out. It's free, uh, the sheriff's office, county government, the state of Michigan help us pay for it. And we really want our community to understand what's going on around violence in Washtenaw County.

10:04

Radio Host: That's really cool. Yeah, yeah, that's something to definitely put on your calendar. And um, so because we already talked to the other couple of candidates that were here, um, and a lot of people, I think, didn't necessarily know that the sheriff is elected. Position office, the sheriff's office is an elected, you know what I'm saying, right, we learned that we've learned that over the last, it took us a good few years to learn it, but we did learn that. Um, so tell us about Derek Jackson and your, your background and, and what you're planning.

Candidate Jackson: *Yeah, so you know I've been with the sheriff for 15 years. I'm a social worker who became a police officer and now people are getting used to what that really means, but when I started 15 years ago, Jerry Clayton had this crazy idea, how can we do what you do in community through a police agency, not just be a police agency that is really good at arresting folks, but how do we prevent that crime in the first place?*

The CBI summit I just mentioned is one example of how we're trying to do that.

So I came over 15 years ago to be the director here at the sheriff's office, and we've done some pretty phenomenal things. Uh, Jerry is the longest serving sheriff in our county's history.

So with his full support, we want to continue that great work we've done. I got a 1 year old and a 2 year old that I just dropped off at daycare. Uh, my wife is, her head is spinning right now. If we were finished, if the sheriff's

office was perfect, I'd be, you know, at home with them right now. I wouldn't be out here doing this. So the issues are really important.

I keep telling people that I feel like I discovered the secret that I can't yell loud enough for people to hear that like change within policing is possible. We do great work here in Washtenaw County. We have phenomenal staff. We are like the premier police agency in the state of Michigan right now. And so that's what I want to continue.

11:40

Radio Host: I can say that I can back that up because I've worked my, my full radio career over the last 20 something years has been all in Michigan but different areas of Michigan, and I've never worked with a police department or a sheriff's office that has been, that I've seen more involved in the community than Washnaw County.

11:54

Candidate Jackson: And you know, that's been my job. So a lot of folks will take an officer who's really good with community and sitting on the neighborhood watch, but the higher director whose whole job is about building trust, bringing community and police together. It's not just some one-off programs. It's a philosophy in what we do every single day, and we want to continue that.

12:10

Radio Host: That's amazing. Director Jackson, thank you so much for time by. Good luck. Uh, the election is when?

12:15

Candidate Jackson: August 6.

Radio Host: August 6th. Make sure you get out and, uh, uh, you know, you use your power and vote, vote, vote, vote, very important.

I have relistened to the entire segment multiple times in the course of writing this rebuttal. It is incredibly difficult to understand how Candidate Jackson could be doing anything other than campaigning in uniform when he begins the interview

acknowledging his candidacy for Sheriff, devotes more time in the segment to discussing his professional contributions to the Sheriff's department, and ends with the date of the upcoming election in which he will be on the ballot as a Sheriff's candidate.

I do not believe Candidate Jackson was unfairly strong-armed into an uncomfortable exchange about his campaign in uniform by the radio hosts and it is highly unlikely that Candidate Jackson was legitimately caught off-guard by any questions related to an event where both of his known election challengers were also invited and in attendance.

Candidate Jackson's excuse for his conduct at the W4 Country event is woefully disrespectful to the intelligence of the voting public, or, an admission of an incredible lack of professional judgement and ethics on behalf of the individual appointed to engage with the community on behalf of one of the largest law enforcement agencies in the State of Michigan.

Artifact 3: Online Campaigning Using Washtenaw County Sheriff Department Resources

"Was published by a campaign staffer" does not provide sufficient technical details to support his claims of innocence and belies a shocking ignorance of modern technology and social media management which is shocking considering his tenure as a key communicator for the entire department.

I challenge Candidate Jackson to provide the following information from the Derrick Jackson for Washtenaw County Sheriff Facebook settings:

1. Screenshot of the list of individuals documented in the list of "People with Facebook access". Membership in this list will allow a user to manage the page directly via the app or through other tools.
2. Screenshots of the "Page Management History" identifying the user, date, and time each of the posts in question was made:
 - a. Friday, April 26, 2024
 - b. Monday, April 29, 2024
 - c. Thursday, April 25, 2024 at 10:54
 - d. Tuesday, April 23, 2024 at 2:41
 - e. Friday, April 19, 2024
 - f. Friday, April 12, 2024
 - g. Friday, April 12, 2024

Unless Candidate Jackson provides the following details about the setup of his campaign Facebook page, his response to this complaint is incomplete, has failed to definitively disprove the allegations made in the complaint, and reveals a gaping omission in Michigan Campaign Finance rules and regulations.

Artifact 6: Display of Official Law Enforcement Badge During Campaign Debate

Candidate Jackson admits to displaying his badge during a panel for all sheriff's candidates hosted by the Washtenaw County Democratic Party in April 2024. This is arguably a more egregious act than campaigning in uniform. Law enforcement badges are not distributed lightly and are used to denote legal authority in situations of life or death and the detainment or restraint of individuals.

Flashing a badge in a campaign activity is a clear violation of the MCFA and no different than campaigning in a uniform provided by public entity or a vehicle designated as a law enforcement vehicle. Candidate Jackson is a certified police officer in the State of Michigan. His completion of the police academy coursework demanded by the State of Michigan to hold the title of police officer was never in question. When Candidate Jackson flashed his badge to the audience it was in response to his opponent highlighting that by Candidate Jackson's own admission he had never arrested a suspect or worked a patrol shift.

His statement about showing his college diploma and other documentation to defend his accomplishments in the course of this campaign is disingenuous. However, it is worthwhile to note that his claims of the title of "social worker" have been called into question due to his lack of a Michigan Social Worker License. Much like Candidate Jackson's flashing of his badge to remind the audience that he had technically completed officer training but had not actually put that training into work in the field, Candidate Jackson waged a campaign as "a social worker that became a cop" with complete disregard for Michigan's statute prohibiting the use of the title "social worker" without completion of the requisite education and training, which Candidate Jackson has never completed.

This misrepresentation has been widely reported in local media and has been investigated by the Michigan Attorney General and is in the midst of being enforced. Below are three professionally written newspaper articles concerning this matter:

- <https://a2independent.com/2024/05/28/sheriff-candidate-is-impersonating-a-licensed-social-worker-ag-and-state-licensing-officials-investigating/>



- <https://a2independent.com/2024/07/16/sheriff-candidate-impersonating-a-social-worker-could-be-charged-with-felony-fraud-michigan-officials-preparing-enforcement/>



COUNTY GOVERNMENT CRIME ELECTIONS

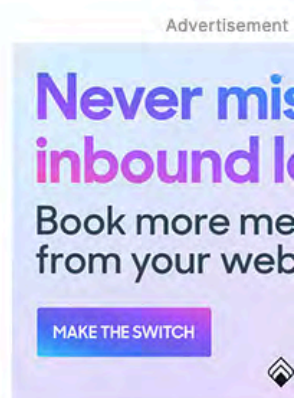
Sheriff Candidate Impersonating A Social Worker Could Be Charged With Felony Fraud: Michigan Officials Preparing Enforcement

By The Ann Arbor Indep... — Last updated Jul 16, 2024

- <https://www.mlive.com/politics/2024/07/sheriff-candidate-says-licensing-complaint-investigation-a-made-up-thing.html>

Sheriff candidate says licensing complaint, investigation 'a made-up thing'

Updated: Jul. 19, 2024, 2:16 p.m. | Published: Jul. 19, 2024, 2:11 p.m.



In conclusion, Candidate Jackson's campaign for the highest law enforcement office in Washtenaw County, Michigan has been at best, lacking in attention to detail, or at worst, an exercise in subtle misinformation and blatant disregard for the spirit and reason for campaign rules. As a citizen it is very difficult to see a candidate for a law enforcement job fail to drive themselves and their team to campaign to the highest ethical standards possible.

I still contend that the aforementioned actions of Candidate Jackson on social and news media and during in person campaign events are violations of the MCFA.

Certification: 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.

Crystal Lecoq

August 19, 2024



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

August 21, 2024

Derrick Jackson
PO Box 972111
Ypsilanti, MI 48197

Re: *Lecoq v. Jackson*
Campaign Finance Complaint No. 24-041

Dear Derrick Jackson:

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

At this point, the Department will commence the determination phase of the campaign finance complaint process, during which time all submitted materials will be reviewed. Within 45 business days of its receipt of the 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: Crystal Lecoq



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

September 5, 2024

Derrick Jackson
PO Box 972111
Ypsilanti, MI 48197

Re: *Lecoq v. Jackson*
Campaign Finance Complaint No. 24-041

Dear Derrick Jackson:

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

The complaint alleged that you used public resources to further your campaign. Crystal Lecoq alleged that you misused public resources by using governmental social media for your campaign, campaigning during your work hours, and using public resources like uniforms, badges, and office space to further your campaign.

You responded to the complaint. In your response, you claimed you used no public resources for your campaign and provided evidence such as photos of your home office and government office.

Crystal Lecoq provided a rebuttal statement. In that statement, Crystal Lecoq alleged that the evidence you provided did not prove that public resources were not used.

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).

Crystal Lecoq made ten separate allegations concerning the use of public resources to further your campaign. The Department has reviewed the evidence submitted in this matter and finds insufficient evidence has been presented to support a finding of a potential violation of the MCFA.

First, it was alleged that the Monday, April 29, 2024 Derrick Jackson for Washtenaw County Sheriff Facebook post was a misuse of public resources. This is determined not to be a violation because, given the statutory definition of “contribution”, no contribution was made. MCL 169.204.

Crystal Lecoq retracted her second complaint.

Next, Crystal Lecoq alleged that you used public resources when partaking in W4country’s Firehouse Friday and that this event was an event for your campaign. Section 57(1)(b) exempts the use of public resources from being considered a contribution when they are used to “produc[e] or disseminat[e] of factual information concerning issues relevant to the function of the public body.” Because you were providing factual information about the election, no violation is found to have occurred.

Then, Crystal Lecoq alleged that your promotion of the Washtenaw Sheriff Reentry Program violated Section 57. This is determined not to be a violation because, given the statutory definition of “contribution”, no contribution was made. MCL 169.204.

Further, it was alleged that you engaged in campaigning for your election through the direct use of public resources. The Department finds this claim to be unsubstantiated because there was no actual evidence that public resources were used for any of the posts mentioned.

More, it was alleged that you used public resources to create videos for your campaign. The Department finds this claim to be unsubstantiated because there was no accurate or actual evidence that public resources were used for any of the posts mentioned.

Next, Crystal Lecoq alleged that you misused your uniform (a public resource) in connection with campaigning for your election. However, the link provided did not link to a post made by your campaign and this post was not located on your page. Therefore, no violation is found.

Again, Crystal Lecoq alleged that you used public resources when partaking in W4country’s Firehouse Friday and that this event was an event for your campaign. Section 57(1)(b) exempts the use of public resources from being considered a contribution when they are used to “produc[e] or disseminat[e] of factual information concerning issues relevant to the function of the public body.” Because you were providing factual information about the election, no violation is found to have occurred.

Then, Crystal Lecoq made the allegation that your appearance in uniform, alongside your campaign being tagged, in an Instagram photo, constituted a violation. Because this post was not made on your page, the Department finds you have engaged in no violation.

Finally, Crystal Lecoq alleged that your display of your police badge at a candidate debate was an impermissible use of public resources, However, given the context you provided (that you

were resolving a claim that you were not a police officer), the Department finds that this falls within the Section 57(1)(b) exemption.

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 cursive script that reads "James Biehl".

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

c: Crystal Lecoq