



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
Mailing address		
City	State	Zip
Email (<i>recommended</i>)		

Section 2. Alleged Violator (Respondent)

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

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

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

I allege a violation of the following:

- MCFA
- Public officer disclosure
- Candidate disclosure

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

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

Section 4. Certification *(required)*

I certify that to the best of my knowledge, information, and belief, formed after a reasonable inquiry under the circumstances, each factual contention of this complaint is supported by evidence.

Signature of complainant

Date

Section 5. Certification without Evidence *(supplemental to Section 4)*

If, after a reasonable inquiry under the circumstances, you are unable to certify that certain factual contentions are supported by evidence as indicated above, you may make the following certification:

I certify that to the best of my knowledge, information, or belief, there are grounds to conclude that the following specifically identified factual contentions are likely to be supported by evidence after a reasonable opportunity for further inquiry. Those specific contentions are:

Signature of Complainant

Date

Section 15(8) of the MCFA provides that a person who files a complaint with a false certification is responsible for a civil violation of the MCFA. The person may be required to pay a civil fine of up to \$1,000 and some, or all, of the expenses incurred by the Michigan Department of State and the alleged violator as a direct result of the filing of the complaint. MCL 169.215(16).

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

Section 6. Submission

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

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:

MCL Section 169.247

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

See photo in email of campaign signs with no disclosure.

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

July 10, 2024

Date

From: [Theresa Nallamothu](#)
To: [MDOS-BOERegulatory](#)
Subject: Campaign Finance Complaint - HOLLAND
Date: Wednesday, July 10, 2024 7:36:00 AM
Attachments: [Campaign Finance Complaint - HOLLAND.pdf](#)
[Campaign finance complaint signature page.pdf](#)

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

Terri Nallamothu
terrinnallamothu@mac.com
248-892-0210





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

July 22, 2024

Tina Holland
6292 Lake Waldon Drive
Clarkston, MI 48346

Re: *Nallamothu v. Holland*
Campaign Finance Complaint No. 24-071

Dear Tina Holland:

The Department of State (Department) has received a formal complaint alleging you have violated MCL 169.247 of the Michigan Campaign Finance Act (MCFA) by failing to include an identification statement on your campaign signs. A photo of the sign was included with the complaint; a copy of the complaint is enclosed.

The MCFA and corresponding administrative rules require a person who produces printed material that relates to an election include the phrase "Paid for by [name and address of the person who paid for the item]." MCL 169.247(1), R 169.36(2). A knowing violation constitutes a misdemeanor offense punishable by a fine of up to \$1,000.00, imprisonment for up to 93 days, or both. MCL 169.247(6).

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

After reaching this conclusion, the Act requires the Department to "endeavor to correct the violation or prevent a further violation by using informal methods" if it finds that "there may be reason to believe that a violation ... has occurred [.]". MCL 169.215(10). The objective of an informal resolution is "to correct the violation or prevent a further violation." *Id.*

Given this, the Department concludes that a formal warning is a sufficient resolution to the complaint and is hereby advising you that MCL 169.247(1) and R 169.36(2) require you to print a complete and accurate identification statement on all campaign materials, consisting of the phrase "paid for by" followed by the full name and address of your committee.

Note that all printed materials referencing you or your candidacy produced in the future must include this identification statement. For all materials currently in circulation, the paid for by statement must be corrected. If this information has been included in your materials and you wish to rebut the Department's conclusion, you must respond in writing to the Department to BOERegulatory@Michigan.gov within 15 business days of the date of this letter. Otherwise, the Department will treat the complaint as resolved.

Please be advised that this notice has served to remind you of your obligation under the Act to identify your printed matter and may be used in future proceedings as evidence that tends to establish a knowing violation of the Act. A knowing violation is a misdemeanor offense and may merit referral to the Attorney General for enforcement action. MCL 169.247(6), 215(10).

Sincerely,

Regulatory Section
Bureau of Elections
Michigan Department of State

Enclosure

c: Theresa Nallamothu

From: [Tina Holland](#)
To: [MDOS-BOERegulatory](#)
Subject: Yard sign was posted with "Paid forby Tina Holland C.T.E. and my address of 6292 Lake Waldon Dr. on back of signs.
Date: Sunday, July 28, 2024 3:13:57 PM

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

Committee Identification Number Assignment is :98389

Ms. Theresa Nallamothe failed to look up close to the back of the yard signs small prints that has "paid for by Tina Holland and my address on it.
Perhaps Ms. Nallamothe is in need of glasses?

Sending pictures of both sides per DARCY at the Election dept.
Thank you. Tina Holland July-28th,2024

ELECT TINA

HOLLAND

FOR

TRUSTEE

6292 LK. WALDON DR. 48346

PAID FOR BY C.T.E. TINA HOLLAND

From: [Tina Holland](#)
To: [MDOS-BOERegulatory](#)
Subject: 2nd photo of back of yard sign per DARCY in election dept.
Date: Sunday, July 28, 2024 3:27:47 PM

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

Identification number :98389

Tina Holland
6292 Lake Waldon Dr, Village of Clarkston, MI 48346
248-496-8787 or 248-707-6357.

HOLLAND

FOR

TRUSTEE

6292 LK. WALDON DR. 48346

PAID FOR BY C.T.E.

TIANA HOLLAND

TARPON SPRINGS, FL

From: [Tina Holland](#)
To: [MDOS-BOERegulatory](#)
Subject: Re: Yard sign was posted with "Paid forby Tina Holland C.T.E. and my address of 6292 Lake Waldon Dr. on back of signs.
Date: Sunday, July 28, 2024 4:25:49 PM

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

Also,I have reported waiver of expenses of C98389

On Sun, Jul 28, 2024, 3:13 PM Tina Holland <greeklady19@gmail.com> wrote:
Committee Identification Number Assignment is :98389

Ms. Theresa Nallamothe failed to look up close to the back of the yard signs small prints that has "paid for by Tina Holland and my address on it.
Perhaps Ms. Nallamothe is in need of glasses?

Sending pictures of both sides per DARC at the Election dept.
Thank you. Tina Holland July-28th,2024



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

August 21, 2024

Theresa Nallamotheu
7427 Foxburg Court
Clarkston, MI 48348

Re: *Nallamotheu v. Holland* Campaign Finance Complaint No. 24-071

Dear Theresa Nallamotheu:

The Department of State received a response from Tina Holland 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: Tina Holland



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

September 18, 2024

Tina Holland
6292 Lake Waldon Drive
Clarkston, MI 48346

Re: *Nallamothu v. Holland*
Campaign Finance Complaint No. 24-071

Dear Tina Holland:

The Department of State (Department) has finished investigating the campaign finance complaint filed against you by Theresa Nallamothu 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 failed to include the required identification statement on your campaign signs.

You responded to the complaint. In your response, you claimed the identification statement was included on your signs and include photos of your signs.

The MCFA and corresponding administrative rules require a person who produces printed material that relates to an election include the phrase "Paid for by [name and address of the person who paid for the item]." MCL 169.247(1), R 169.36(2). This phrase is to be "in a place and in a print clearly visible to and readable by an observer." R 169.36(1). A knowing violation constitutes a misdemeanor offense punishable by a fine of up to \$1,000.00, imprisonment for up to 93 days, or both. MCL 169.247(6).

Upon review, the evidence submitted supports the conclusion that a potential violation of the Act has occurred. From the outset, the Department must consider whether the materials fall within the ambit of the MCFA. Because the materials explicitly advocate for the election or defeat of a candidate, the materials contain express advocacy as defined by the Act. MCL 169.206(2)(j). As explained above, such materials must contain a "paid for by" statement listing the name and address of the committee purchasing the materials.

The Department has reviewed the evidence submitted in this matter and finds that sufficient evidence has been presented to support a finding of a potential violation of the MCFA. While your signs do include an identification statement, the statement does not meet the requirements for an identification statement. The statement must "include the words "Paid for by," followed by the full name of the person or committee paying for the material and the person's or committee's

street number or post office box, city or town, state, and zip code.” R 169.36(2). Your identification statement omits parts of this requirement. Additionally, this identification statement is not present in the evidence submitted by Theresa Nallamothu.

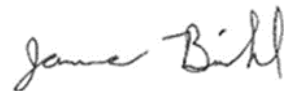
After reaching this conclusion, the Act requires the Department to “endeavor to correct the violation or prevent a further violation by using informal methods” if it finds that “there may be reason to believe that a violation ... has occurred [.]” MCL 169.215(10). The objective of an informal resolution is “to correct the violation or prevent a further violation.” *Id.*

Given this, the Department concludes that a formal warning is a sufficient resolution to the complaint and is hereby advising you that MCL 169.247(1) and R 169.36(2) require you to print a complete and accurate identification statement on all campaign materials, consisting of the phrase “paid for by” followed by the full name and address of your committee.

Note that all printed materials referencing you or your candidacy produced in the future must include this identification statement. For all materials currently in circulation, the paid for by statement must be corrected.

Please be advised that this notice has served to remind you of your obligation under the Act to identify your printed matter and may be used in future proceedings as evidence that tends to establish a knowing violation of the Act. A knowing violation is a misdemeanor offense and may merit referral to the Attorney General for enforcement action. MCL 169.247(6), 215(10).

Sincerely,

A handwritten signature in dark ink, appearing to read "James Biehl". The signature is fluid and cursive, with the first name "James" written in a larger, more prominent script than the last name "Biehl".

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