



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 Jacqueline Arvanitis		Daytime telephone number 843-259-9241
Mailing address 3563 W Samaria Road		
City Temperance	State MI	Zip 48182
Email (<i>recommended</i>) jacquelinewhite0530@gmail.com		

Section 2. Alleged Violator (Respondent)

Name Craig Montri		
Mailing address 7576 Chapelview Court		
City Temperance	State MI	Zip 48182
Email (<i>recommended</i>) cmontri@bedfordmi.org		
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:

Section(s) Alleged to be Violated: Michigan Campaign Finance Act, Section 57 (MCL 169.257)

Explanation of Violation: Craig Montri, Bedford Township Trustee, violated Section 57 by using public resources to advocate against a ballot question: the Monroe County Community College (MCCC) Millage Proposal on the November 4, 2025 ballot.

1. Use of Public Meetings: On October 7 and October 21, 2025, during official township board meetings held in the government building, Trustee Montri used the Board Comment portion to urge residents to vote "No" on the MCCC Millage. These statements were made on township time, in an official meeting space, and were captured on the township's live stream and recorded video, demonstrating the use of publicly funded resources to influence a ballot question prior to the election.
2. Social Media Activity: Trustee Montri also shared posts opposing the MCCC millage on a Facebook page titled "Citizens of Bedford for Craig Montri". The page includes his official township email address and campaign materials, linking the advocacy directly to his public office. Using a publicly affiliated platform to urge voters constitutes a prohibited use of public resources under Section 57.

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

1. October 7, 2025 – Bedford Township Board of Trustees Meeting

YouTube Recording: <https://www.youtube.com/live/XrNA3hipDpl?si=N8dNmTrOHxa9RwMg>

Timestamp: 1:47:42

Quoted Statement: "Yeah, I'll make a couple recommendations. Um, I would also recommend, uh, Bedford residents to vote no on the Monroe County Community College millage and I would also like to request, uh, that the minutes reflect, uh, that specific opinion, uh, that I'm saying vote no on the Monroe County, uh, community college millage please."

Additional Reference: Statement also documented in the meeting minutes on the Bedford Township website.

2. October 21, 2025 – Bedford Township Board of Trustees Meeting

YouTube Recording: https://www.youtube.com/live/1Hpi2kCbJA4?si=DVD1Zo_l2G1VnVD3

Timestamp: 52:17

Quoted Statement: "I'll tell people how to vote. I would I would recommend uh all Bedford residents vote no on the Monroe Community College millage."

3. Facebook Page – "Citizens of Bedford for Craig Montri" Link:

<https://www.facebook.com/BedfordTownshipTrustee24>

Post Date: October 7, 2025, urging residents to vote "No" on the MCCC Millage. Page displays official township email and campaign materials, demonstrating that advocacy was connected to his public office.

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

11/10/2025

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:

Michigan Campaign Finance Act, Section 57 (MCL 169.257)

Explanation of Violation:

This complaint alleges that Craig Montri, a member of the Bedford Township Board of Trustees, violated Section 57 of the Michigan Campaign Finance Act (MCL 169.257) by using his public position and publicly affiliated resources to advocate against a ballot question: the Monroe County Community College (MCCC) Millage Proposal, which appeared on the November 4, 2025 ballot.

Section 57(1) prohibits a public body or anyone acting on its behalf from using public funds, facilities, equipment, or other public resources to make a contribution or expenditure to influence the outcome of an election or ballot question.

1. Use of Public Meetings for Advocacy:

On October 7, 2025, and October 21, 2025, during official Bedford Township Board of Trustees meetings held in the government building, Trustee Montri used the Board Comment portion to urge residents to vote “No” on the MCCC Millage Proposal. These statements were made on township time, in an official meeting space, and were captured on the township’s live stream and recorded meeting video, demonstrating the use of publicly funded resources to advocate against a ballot question prior to the November 4, 2025 election.

2. Social Media Activity:

Trustee Montri also used a Facebook page titled “Citizens of Bedford for Craig Montri” to advocate against the MCCC Millage Proposal prior to the election. The page includes his official Bedford Township government email address and campaign images from his prior trustee election, clearly linking the account to his public office. Posting election advocacy through a page associated with his official role constitutes the use of a publicly affiliated resource to influence a ballot question.

By using publicly funded meeting time, township communication platforms, and a social media page displaying an official township email address to advocate against a ballot measure before the November 4, 2025 election, Trustee Montri engaged in prohibited activity under Section 57 of the Michigan Campaign Finance Act.

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

Evidence:

1. October 7, 2025 – Bedford Township Board of Trustees Meeting

YouTube Recording: <https://www.youtube.com/live/XrNA3hipDpI?si=N8dNmTrOHxa9RwMg>

Timestamp: 1:47:42

Quoted Statement:

“Yeah, I’ll make a couple recommendations. Um, I would also recommend, uh, Bedford residents to vote no on the Monroe County Community College millage and I would also like to request, uh, that the minutes reflect, uh, that specific opinion, uh, that I’m saying vote no on the Monroe County, uh, community college millage please.”

Additional Reference: Statement also documented in the meeting minutes on the Bedford Township website.

2. October 21, 2025 – Bedford Township Board of Trustees Meeting

YouTube Recording: https://www.youtube.com/live/1Hpi2kCbJA4?si=DVD1Zo_l2G1VnVD3

Timestamp: 52:17

Quoted Statement:

“I’ll tell people how to vote. I would I would recommend uh all Bedford residents vote no on the Monroe Community College millage.”

3. Facebook Page – “Citizens of Bedford for Craig Montri”

Page URL: <https://www.facebook.com/BedfordTownshipTrustee24>

On October 7, 2025, a post was shared opposing the MCCC Millage Proposal and urging residents to vote “No.”

The page includes Craig Montri’s official Bedford Township government email address and campaign materials from his prior trustee election, clearly linking the account to his public office.

This post demonstrates the use of a publicly identifiable government resource for advocacy coinciding with his official board meeting statements that same day.



Citizens of Bedford for Craig Montri



Intro

Public servant

Page · Government Official

cmontri@bedfordmi.org

Photos

See all photos



Annual throwback to Halloween 2008 when Rand thought our ten trillion dollar debt was so scary he created a costume about it. Now it's \$38 trillion... with one trillion dollars of debt added in JUST THE LAST THREE MONTHS!! Truly terrifying for the future of our country.



Thomas Massie @RepThomasMassie The debt badge I built calibrates to the penny with treasury.gov, but the last time they published the debt was on 10/17, so it projects that debt to today's debt based on the debt per second over the last year. By my calculations, the debt just crossed \$38 trillion!

I actually wasn't invited to the White House lunch today, but that's ok I had a previously scheduled Liberty Caucus. Lunch with...

Thomas Massie @RepThomasMassie Dogs don't bark at parked cars. There's a reason some of the world's richest and most powerful people are trying to get me out of...



Citizens of Bedford for Craig Montri

October 7 · 🌐



ay close attention to the section in y
book on pages 454-457 that talks about
queering children's stories. Other than
ole and Rat in Wind and The Willows, c
you think of Children's Books that have
ould be seen as having queer undertones

MCCC Class Assignment
Children's Literature
erequisite for Early Childhood Educat



Tow Strap

October 6 · 🌐


Here's the English professor's assignment. Note her bio in the link. PhD in gender studies.


Big surprise..... See more



Citizens of Bedford for Craig Montri

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Contact info

 cmontri@bedfordmi.org
Email



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

November 17, 2025

Craig Montri
7576 Chapelview Court
Temperance, MI 48182

Re: *Arvanitis v. Montri*
Campaign Finance Complaint No. 25-115

Dear Mr. Montri:

The Department of State (Department) has received a formal complaint filed against you by Jacqueline Arvanitis alleging that you violated the Michigan Campaign Finance Act (MCFA or Act). Specifically, the complaint alleges that you used the Bedford Township board meeting to urge residents to oppose the Monroe County Community College millage. A copy of the complaint is included with this notice.

In Michigan, it is unlawful for a public body or an individual acting on its behalf to use or authorize the use of equipment, supplies, personnel, funds, or other public resources to make a contribution or expenditure. MCL 169.257(1). The words “contribution” and “expenditure” are terms of art that are generally defined to include a payment or transfer of anything of ascertainable monetary value made for the purpose of influencing or made in assistance of the qualification, passage, or defeat of a ballot question. MCL 169.204(1), 169.206(1). 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 Jacqueline Arvanitis, 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 Division of the Bureau of Elections at BOERegulatory@Michigan.gov.

Sincerely,

Regulatory Division
Bureau of Elections
Michigan Department of State

c: Jacqueline Arvanitis

MICHIGAN DEPARTMENT OF STATE
MICHIGAN BUREAU OF ELECTIONS
REGULATORY DIVISION

JACQUELINE ARVANITIS
3563 West Samaria Road
Temperance, MI 48182,

CAMPAIGN FINANCE
COMPLAINT NO. 25-115

Complainant,

vs.

CRAIG MONTRI
7576 Chapelview Court
Temperance, MI 48182,

Respondent.

Jacqueline Arvanitis
In Pro Per

3563 West Samaria Road
Temperance, MI 48182

Philip D. Goldsmith (P37650)
Attorney for Respondent

Lennard, Graham & Goldsmith, P.L.C.
222 Washington Street
Monroe, MI 48161
Telephone: (734) 242-9500
Facsimile: (734) 242-9509
Email: pgoldsmith@lggplc.com

ANSWER TO COMPLAINT

NOW COMES Respondent, Craig Montri, in his official capacity as a duly elected Bedford Township Trustee, by and through his attorneys, Lennard, Graham & Goldsmith, P.L.C., and for his Answer to the formal Complaint made by Jacqueline Arvanitis, states as follows.

RECITATION OF COMPLAINT

Ms. Arvanitis' Complaint "alleges that Craig Montri, the Bedford Township Trustee, violated Section 57 of the Michigan Campaign Finance Act (MCL 169.257) by using public resources to advocate against a ballot proposal: the Monroe County Community College (MCCC) millage proposal, which appeared on the November 4, 2025 ballot.

1. Use of Public Meetings for Advocacy. On October 7, 2025 and October 21, 2025, during an official Township Board meeting held in the government building, Trustee Montri used the Board comment portion to urge residents to vote "No" on the MCCC millage. These statements were made on Township time, in an official meeting space, and were captured on the Township's live stream and recorded video, demonstrating the use of publicly funded resources to influence a ballot question prior to the election.

2. Social Media Activity. Trustee Montri also shared posts opposing the MCCC millage on a Facebook page entitled "Citizens of Bedford for Craig Montri". The page includes his official Township email address and campaign materials, linking the advocacy directly to his public office. Using a publicly affiliated platform to urge voters constitutes a prohibited use of public resources under Section 57."

INTRODUCTION

The primary issue presented by Ms. Arvanitis' Complaint is whether an elected Township Trustee violates the Michigan Campaign Finance Act (MCFA) by expressing a personal opinion opposing a community college millage renewal proposal during the Trustee's comment portion of a regularly scheduled Township Board meeting that is televised at Township expense, and by expressing a personal opinion regarding the candidacy of an individual running for judicial office in the 2026 general election. Furthermore, this Answer addresses whether such remarks constitute a "contribution" or "expenditure" under MCL 169.204(1) and MCL 169.206(1).

STATEMENT OF FACTS RELEVANT TO THE ISSUES ADDRESSED IN THIS ANSWER TO COMPLAINT

Bedford Township, Monroe County, Michigan holds regularly scheduled Township Board meetings on the first and third Tuesdays of each month. The Township Board meetings are routinely televised for the benefit of all Bedford Township residents and the public in general. At the end of each Bedford Township Board meeting a Trustee - comment segment is provided for each Trustee to address the residents of Bedford Township on matters selected by the Trustee. During the Trustee - comment portion of three (3) recent Township Board meetings, Trustee

Craig Montri expressed a personal opinion opposing a community college district millage renewal.

No Township staff time, special materials, communications, or additional public resources were directed toward advocating for or against the Monroe County Community College ballot proposal or the judicial candidate. The Township Board meeting, including televising it, would have occurred regardless of Trustee Craig Montri's remarks during Trustee - comment time.

ARGUMENT

I. BEDFORD TOWNSHIP TRUSTEE CRAIG MONTRI DID NOT USE EQUIPMENT, SUPPLIES, PERSONNEL, FUNDS, OR OTHER PUBLIC RESOURCES TO MAKE A CONTRIBUTION OR EXPENDITURE DEFINED AS A PAYMENT OR TRANSFER OF ANYTHING OF ASCERTAINABLE MONETARY VALUE FOR THE PURPOSE OF INFLUENCING OR MADE IN THE ASSISTANCE OF THE QUALIFICATION, PASSAGE, OR DEFEAT OF A BALLOT QUESTION.

Section 57 of the Michigan Campaign Finance Act (MCFA) prohibits a public body or person acting for a public body from using or authorizing the use of public funds or resources to make a contribution or expenditure to further the nomination or election of a candidate or the qualification, passage, or defeat of a ballot question. Section 57 of the MCFA does not restrict the Constitutionally protected right to associate or to engage in political speech. Rather, if it is intended to prevent those who control public resources from using those resources to influence the outcome of an election.

MCL 169.204(1) states:

“(1) “Contribution” means a payment, gift, subscription, assessment, expenditure, contract, payment for services, dues, advance, forbearance, loan, or donation of money or anything of ascertainable monetary value, or a transfer of anything of ascertainable monetary value to a person, made for the purpose of influencing the nomination or election of a candidate, for the qualification, passage, or defeat of a ballot question, or for the qualification of a new political party.”

MCL 169.206(1) states:

“(1) “Expenditure” means a payment, donation, loan, or promise of payment of money or anything of ascertainable monetary value for goods, materials, services, or facilities in

assistance of, or in opposition to, the nomination or election of a candidate, the qualification, passage, or defeat of a ballot question, or the qualification of a new political party.”

A. TRUSTEE CRAIG MONTRI’S REMARKS DURING THE TRUSTEE - COMMENT PORTIONS OF REGULARLY SCHEDULED BEDFORD TOWNSHIP BOARD MEETINGS DOES NOT CONSTITUTE A PROHIBITED USE OF PUBLIC RESOURCES UNDER MCL 169.257(1).

The Michigan Campaign Finance Act prohibits public bodies from using public resources to advocate for or against ballot questions; however, a distinction is drawn between: (1) institutional advocacy using public funds, which is prohibited, and (2) personal expression by elected officials during normal governmental proceedings, which is permitted, provided no additional public resources are used. MCFA Section 57 violations require affirmative, purposeful use of public resources to influence an election. When the governmental function (such as a public meeting and its public broadcast) is already occurring and funded for non-election purposes (such as public transparency), incidental use does not rise to the level of a prohibited “use of public resources”. The Michigan Secretary of State’s published guidance similarly states that public officials may express personal views about ballot questions so long as no public resources are used to disseminate or support those views. Regularly televised public meetings are expressly identified as not constituting improper use, absent additional resource expenditure. A Trustee’s personal comments made during a standard public meeting, one that would have occurred and been televised regardless of the content, fall into the category of incidental government use, not prohibited advocacy.

B. TRUSTEE CRAIG MONTRI’S REMARKS DID NOT CONSTITUTE A “CONTRIBUTION” UNDER MCL 169.204(1).

A contribution must involve a payment or transfer of monetary value. Verbal expression of a personal opinion at a public meeting does not involve payment, transfer of services, transfer of property, use of public staff, or provision of anything with ascertainable monetary value. Speech alone does not constitute a contribution under the MCFA. Because Trustee Craig Montri did not provide any monetary or material support, the statutory elements of a contribution are not satisfied.

C. TRUSTEE CRAIG MONTRI’S REMARKS DID NOT CONSTITUTE AN “EXPENDITURE” UNDER MCL 169.206(1).

An expenditure under MCL 169.206(1) requires the use of public resources, undertaken for the purpose of influencing the outcome of a ballot question. An expenditure does not occur when public resources are used incidentally as part of a pre-existing governmental function. In the complaint against Trustee Craig Montri it is important to recognize that the Bedford

Township Board meetings would have occurred regardless of Trustee Craig Montri's remarks during Trustee - comment time. Further, televising the Bedford Township Board meetings is a routine transparency practice. Finally, no special funds, materials, or staff actions were taken to amplify or promote Trustee Craig Montri's remarks. Because no public resources were intentionally used for the purpose of influencing the ballot question, the statutory elements of an expenditure are not met.

D. THE "EXPRESSION OF VIEWS" EXEMPTION APPLIES TO THE SUBJECT COMPLAINT.

MCL 169.257(1)(a) states that MCL 169.257(1) does not apply to "(a) the expression of views by an elected or appointed official who has policy making responsibilities". Trustee Craig Montri is an elected Bedford Township Trustee, who among other responsibilities has policy making responsibilities. Accordingly, MCL 169.257(1) does not apply to the expression of views made by Trustee Craig Montri during the Trustee - comment portion of regularly scheduled Bedford Township Board meetings.

E. THE EQUAL OPPORTUNITY EXEMPTION SET FORTH IN MCL 169.257(1)(d) APPLIES TO THIS COMPLAINT.

MCL 169.257(1)(d) states that MCL 169.257(1) does not apply to "(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". In the Complaint under consideration the Monroe County Community College sponsored the millage proposal. During public comment on at least one evening that Trustee Craig Montri made his comments during Trustee - comment time, three Monroe County Community College employees spoke in favor of the millage, using the same meeting room, and the same recording system that captured Trustee Montri's remarks. The Monroe County Community College employees' comments were archived equally on the Township's YouTube channel. Given the fact that the Monroe County Community College representatives used the same public facilities to present the views of the Monroe County Community College, and the Township's recording practices were content - neutral and routine, there was no selective benefit, no expenditure for the purpose of influencing an election and thus no violation of Section 57 of the MCFA.

F. THE FIRST AMENDMENT PROHIBITS RESTRAINTS ON POLITICAL SPEECH.

The First Amendment of the United States Constitution provides that Congress "shall make no law . . . abridging the freedom of speech". The Fourteenth Amendment makes that prohibition applicable to the states. Stromberg v California, 283 U.S. 359, 368, 51 S.Ct. 532, 75 L.Ed. 1117 (1931). The regulation of political speech or expression is, and always has been, at the core of the protection afforded by the First Amendment. McIntyre v Ohio Elections

Comm'n, 514 U.S. 334, 346, 115 S.Ct. 1511, 131 L.Ed. 2d 426 (1995). “Political speech is the primary object of First Amendment protection and the lifeblood of a self-governing people.” McCutcheon v FEC, 134 S.Ct. 1434, 1462, 188 L.Ed. 2d 468 (2014) (Thomas, J. concurring) (Internal quotations omitted). Discussion of ballot proposals - no matter who the speaker - is political speech. Meyer v Grant, 486 U.S. 414, 108 S.Ct. 1886 (1988). Laws that burden political speech are “subject to strict scrutiny, which requires the government to prove that the restriction furthers a compelling interest and is narrowly tailored to achieve that interest.” Federal Election Commission v Wisconsin Right to Life, Inc., 551 U.S. 449, 127 S.Ct. 2652, 168 L.Ed. 2d 329 (2007).

Given the fact that Trustee Craig Montri’s comments were made during a regular meeting of the Bedford Township Board of Trustees that would have occurred and been televised regardless of the content there was no “contribution” under MCL 169.204(1) and no “expenditure” under MCL 169.206(1). Accordingly, Trustee Craig Montri’s comments are protected under the First Amendment of the United States Constitution as applied to the states by the Fourteenth Amendment of the United States Constitution.

G. THE ROUTINE TELEVISIONING OF BEDFORD TOWNSHIP BOARD MEETINGS FOR TRANSPARENCY AND THE CONVENIENCE OF BEDFORD TOWNSHIP RESIDENTS DOES NOT CONSTITUTE USE OF PUBLIC RESOURCES, CONTRIBUTIONS, AND/OR EXPENDITURES UNDER THE MICHIGAN CAMPAIGN FINANCE ACT.

Bedford Township televises every meeting of the Bedford Township Board of Trustees as part of its longstanding transparency practices. The televising and recording of the Bedford Township Board meetings at issue in this Complaint would have occurred regardless of content. No additional resources were used to highlight and/or promote the protected political speech of Trustee Craig Montri.

II. BEDFORD TOWNSHIP TRUSTEE CRAIG MONTRI’S USE OF HIS PRIVATE FACEBOOK PAGE TO ENGAGE IN POLITICALLY PROTECTED SPEECH DOES NOT VIOLATE MCL 169.257(1).

A. TRUSTEE CRAIG MONTRI’S FACEBOOK PAGE IS ENTIRELY PRIVATE.

Trustee Craig Montri’s Facebook page was started and is maintained by him personally. No Township funds, staff, equipment, or time is used for Trustee Craig Montri’s Facebook page. Trustee Craig Montri’s Facebook page is not affiliated with or operated by Bedford Township.

Trustee Craig Montri may engage in protected political speech using his personal resources on his personal time. MCL 169.257(1) states that “this subsection does not apply to any of the following: (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”.

CONCLUSION

Based on the Michigan Campaign Finance Act, Trustee Craig Montri's expression of a personal view regarding the Monroe County Community College millage renewal during the Trustee - comment portion of regularly scheduled and televised Bedford Township Board meetings does not violate MCL 169.257(1). Trustee Craig Montri's remarks did not constitute a “contribution” under MCL 169.204(1). Trustee Craig Montri's remarks did not constitute an “expenditure” under MCL 169.206(1). Trustee Craig Montri's remarks are statutorily exempt under MCL 169.257(1)(a), (d), and (f).

Personal views expressed by elected officials during standard governmental processes are permissible so long as no additional public resources are employed to advocate for or against a ballot question and/or candidate for public office. Those personal views are protected political speech when there is no contribution and/or expenditure involved.

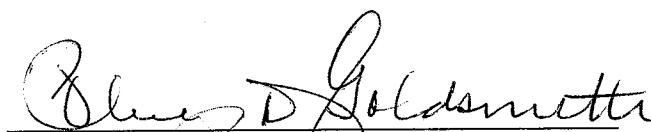
Trustee Craig Montri respectfully requests the Department to determine that there is no reason to believe that a violation of the MCFA has occurred and that the Complaint filed by Ms. Jacqueline Arvanitis be closed.

Respectfully submitted,

Lennard, Graham & Goldsmith, P.L.C.

Dated: December 8, 2025

By:


Philip D. Goldsmith (P37650),
Attorney for Respondent



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

December 09, 2025

Jacqueline Arvanitis
3563 W Samaria Road
Temperance, MI 48182

Re: *Arvanitis v Montri*
Campaign Finance Complaint No. 25-115

Dear Jacqueline Arvanitis,

The Department of State received a response from Phil Goldsmith on behalf of Craig Montri to the complaint you filed against them alleging a violation of the Michigan Campaign Finance Act, 1976 P.A. 388, MCL 169.201 *et seq.* A copy of the response is provided with this letter.

You may file a rebuttal statement after reviewing the response. If you elect to file a rebuttal statement, you are required to do so within 10 business days of the date of this letter. The rebuttal statement may be emailed to BOERegulatory@Michigan.gov or mailed to the Department of State, Bureau of Elections, Richard H. Austin Building, 1st Floor, 430 West Allegan Street, Lansing, Michigan 48918.

Sincerely,

Regulatory Division
Bureau of Elections
Michigan Department of State

c: Phil Goldsmith

REBUTTAL TO RESPONDENT'S ANSWER

Campaign Finance Complaint No. 25-115

Complainant: Jacqueline Arvanitis

Respondent: Craig Montri

I. INTRODUCTION

Complainant submits this rebuttal in response to the Answer to Complaint filed by Respondent Craig Montri. Respondent misstates both the facts and the law under MCL 169.257.

While Respondent frames his actions as personal political speech, the Michigan Campaign Finance Act (MCFA) prohibits the use of public resources to advocate for or against a ballot question, regardless of whether the advocacy occurs through spoken comments, written materials, or social media postings.

Additionally, Respondent's claim that he acted in a personal capacity is contradicted by the fact that he is using the Township's attorney to respond to this complaint. Engaging publicly funded legal counsel in connection with these allegations demonstrates that he treated the matter as arising from his official role, which directly undermines his assertion that his actions were purely personal speech.

The central issue is straightforward: Respondent used his public office, Township time, publicly funded communication systems, Township personnel, and publicly affiliated social media to advocate regarding the Monroe County Community College (MCCC) millage proposal. This constitutes a prohibited use of public resources under MCFA §57, which applies even when no additional expense is incurred and even when remarks are characterized as "personal views."

II. RESPONDENT MISCHARACTERIZES HIS CONDUCT

Respondent claims he merely expressed personal opinion. However:

1. He spoke in his official capacity as Bedford Township Trustee during the Board Comment portion of Township Board meetings, an official governmental function where he is recognized as Trustee.
2. His remarks were explicit, directive, and persuasive advocacy against the MCCC millage:

- September 16, 2025 ([YouTube Timestamp 2:12:06](#)):

"I didn't know Kojo was going to be here, but it was already in my notes as well to, uh, advise to vote "no" on the Monroe County Community College millage. Um, they have, it failed last year. Uh, nothing has changed. Um, they have a lot of work to do. Um, uh, Mr. Petri's comments, uh, kind of summarized that they've got FOIA requests out that they are now in a lawsuit for not following, for, uh, inappropriate actions of, uh, professors

etc. Um, they have a massive, well I'm not, I'm not going to get into it but I advise to vote no on that upcoming millage.”

- October 7, 2025 ([1:47:42 timestamp](#)):

“Yeah, I’ll make a couple recommendations. Um, I would also recommend, uh, Bedford residents to vote no on the Monroe County Community College millage and I would also like to request, uh, that the minutes reflect, uh, that specific opinion, uh, that I’m saying vote no on the Monroe County, uh, community college millage please.”

- October 21, 2025 ([52:17 timestamp](#)):

“I’ll tell people how to vote. I would recommend, uh, all Bedford residents vote “no” on the Monroe Community College millage.”

3. His statements were broadcast using government-owned equipment, managed by Township staff, on a government-operated YouTube channel, and archived permanently as part of official Township communications.
4. Respondent also used a publicly affiliated Facebook page, “Citizens of Bedford for Craig Montri”, which includes his official Township email address and campaign materials from prior elections, to advocate against the MCCC millage.
5. Other public posts to the “Bedford Unleashed” Facebook page by Trustee Montri, using his personal Facebook account, characterize MCCC as promoting “leftist indoctrination” and emphasize that Bedford Township is “an overwhelmingly conservative community,” framing MCCC policies as needing to reflect local values. (See Attached – Montri “Bedford Unleashed” Post)
6. Respondent engaged the Township attorney to respond to this complaint, further demonstrating that he considered this matter part of his official role, contradicting his claim that the original statements were purely personal.

Respondent could have communicated his views outside official meetings and without using public resources.

III. SECTION 57 DOES NOT REQUIRE ADDITIONAL PUBLIC EXPENDITURE

Respondent argues no violation occurred because the meetings, broadcasts, and recordings would have occurred anyway. This is incorrect:

- MCFA §57 prohibits any use of public resources for advocacy. There is no requirement of additional cost, special materials, or extraordinary expenditures.
- Township personnel conducting taping and livestreaming are public resources; their labor constitutes use of public funds.
- Michigan Secretary of State guidance clarifies that public officials cannot advocate on ballot questions or for candidates using preexisting or routine public communication channels, even if no extra cost is incurred.

Respondent may argue that because the Board meeting, broadcast, and recording were already scheduled, their use for advocacy was merely “incidental.” Accepting that reasoning would allow elected officials to campaign during any regularly scheduled, taxpayer-funded event, including Board meetings, work sessions, press conferences, or government-produced broadcasts. Such an interpretation would effectively permit public

officials to convert routine governmental functions into political advocacy platforms at no personal cost, which is precisely what MCFA §57 prohibits. Public resources may not be co-opted for electioneering, regardless of whether the use occurs during a preexisting schedule.

IV. RESPONDENT'S SPEECH AND CONDUCT QUALIFIES AS PROHIBITED USE OF PUBLIC RESOURCES

Trustee Montri used multiple public resources to advocate:

- Township Board meeting room
- Publicly funded audiovisual system
- Government-managed YouTube livestream and archival system
- Township staff to conduct taping and broadcasting
- Board agenda position reserved for elected officials
- Official title as Township Trustee
- Publicly affiliated Facebook page

These are all “public resources” under MCL 169.257. Using these resources to deliver directive, persuasive, and critical statements intended to influence public opinion constitutes a prohibited use of public resources.

V. EXPRESSION OF VIEWS EXEMPTION IS MISAPPLIED

Respondent cites MCL 169.257(1)(a), claiming an exemption for elected officials who express their views. That exemption is misapplied:

1. The exemption applies only when the subject matter falls within the official's policy-making responsibilities. Respondent is a Bedford Township Trustee and has no policy-making authority over the Monroe County Community College millage.
2. Respondent's statements were made in his official capacity using public resources. The statements occurred during formal Township meetings and were disseminated through Township-owned systems with the assistance of Township staff, far exceeding permissible personal expression.
3. Respondent's conduct went beyond mere expression of views. His actions included:
 - Directly urging the public to vote “no”; and
 - Directing the Township Clerk to record his opposition in the official meeting minutes.
4. The Michigan Secretary of State has clarified that the “expression of views” exemption does not authorize the use of government facilities, personnel, or communications systems to advocate for or against ballot questions.

Respondent's reliance on the Township attorney to defend these actions further contradicts his claim that the statements were personal and unrelated to his official role.

VI. EQUAL OPPORTUNITY EXEMPTION DOES NOT APPLY

Respondent incorrectly claims the facility was used equally because MCCC representatives spoke in favor during public comment. This argument fails:

- MCFA §57(1)(d) applies to candidates or committees, not general public comment or employees.
- The fact that others spoke in favor does not cure or authorize Respondent's misuse of official channels.
- Respondent repeatedly spoke against the millage even when MCCC representatives were not present, demonstrating intent to influence voters regardless of whether others had access, undercutting any equal-opportunity argument.

VII. GRANTING COMPLAINANT REQUEST FOR RELIEF WOULD NOT BE A RESTRAINT ON POLITICAL SPEECH

Section 57 of the MCFA restricts the use of public resources, not political speech itself. For the reasons stated in the original complaint and further above, that actions of Respondent constitute a "contribution" and "expenditure".

VIII. EVIDENCE OF DIRECTIVE AND PERSUASIVE ELECTION ADVOCACY

Respondent's statements were:

- Directive: urging voters to vote "no"
- Persuasive: emphasizing prior failures, FOIA lawsuits, and framing MCCC policies as contrary to community values
- Critical of the ballot proposal: characterizing millage as flawed or ineffective
- Intended to influence public opinion prior to election

IX. EVIDENCE OF DISMISSIVE ATTITUDE TOWARD VIOLATIONS

Respondent demonstrated disregard for statutory compliance by repeatedly using official platforms for political advocacy, including:

- September 16, 2025 Trustee-comment period: vote-no directive, repeated messaging, MCCC criticism
- October 7, 2025 Trustee-comment period: vote-no directive, recorded in official minutes, repeated advocacy
- October 21, 2025 Trustee-comment period: vote-no directive, repeated messaging
- Respondent has a long history of advocating against ballot proposals during Township Board meetings. For example, during the September 20, 2022 Trustee-

comment period, he stated, “vote no on proposal three, it can’t pass.” ([YouTube Timestamp 1:22:14](#)): This demonstrates that Respondent has repeatedly used his official platform to influence elections over multiple years and has shown a pattern of not taking statutory compliance seriously.

Despite multiple citizen complaints on October 22, 2025 and on November 7, 2025 (attached), no corrective action was taken. This failure to respond demonstrates a clear disregard for the restrictions on public resources, even after being alerted prior to the November 4, 2025 election. The lack of action suggests that Respondent either knowingly ignored his statutory obligations or acted with reckless indifference.

X. CONCLUSION

Respondent’s actions clearly violate the Michigan Campaign Finance Act (MCFA), despite his assertion that his conduct constitutes personal speech. As evidenced, Respondent used public resources, including Township staff, facilities, and audiovisual equipment, and official title to promote a political message against the Monroe County Community College millage. These actions meet the statutory definitions of both a “contribution” and an “expenditure” under MCL 169.204(1) and MCL 169.206(1).

Respondent’s claim of exemption under the “expression of views” provision of MCL 169.257(1)(a) is misapplied, as his actions were not related to his official duties as a Township Trustee. The MCFA prohibits the use of public resources for political advocacy, regardless of whether additional costs are incurred.

Further, Respondent’s failure to address citizen complaints and his ongoing use of public resources for political purposes demonstrate a disregard for the law. For these reasons, Complainant respectfully requests that the Bureau of Elections find reason to believe a violation of the MCFA has occurred and proceed with enforcement under MCL 169.257 to prevent further violations.

  **Bedford #UnLeashed**

Craig Montri · 3d ·



years ago. Lovely school.

Reply

**Craig Montri** · 2d · **Author**

If they want our support they can get their act together. There's enough leftist indoctrination centers in this country and state. (Basically every college/university outside of a VERY select few)

We're discussing the Monroe COMMUNITY College.

Monroe is an overwhelmingly conservative county, and we want our college to be reflective of the community's values.

If they don't want to support the community's values, they don't need the support of the community's tax dollars. This millage failing for the second time in a year will not financially "ruin the college" or "hurt the students" but it will send a message. And for their sake, hopefully they will be smart enough to make the changes necessary to regain the community's support.

Even our state senator pretends to reflect the community's values now that he realized people are paying attention. Hopefully after this, MCCC does the same, if they don't, that's on them, not us.

Reply 18

**Kristyn Clarke** · 1d**Craig Montri** crybaby alert!!!!

Write a comment...



Fwd: Getting-the-Word-Out Campaign-Finance January-2024

Wed 10/22/2025 9:27 AM

From: Karen Flynn**To:** Pamela Hess, Jacqueline Arvanitis, Cynthia Vincent

Forwarded message

From: **Karen Flynn** <kflynn172@gmail.com>

Date: Wed, Oct 22, 2025 at 9:26 AM

Subject: Fwd: Getting-the-Word-Out_Campaign-Finance_January-2024

To: <aprieur@bedfordmi.org>, Josh Stump <jstump@bedfordmi.org>, <cmontri@bedfordmi.org>, <tbruning@bedfordmi.org>, Trudy Hershberger <thershberger@bedfordmi.org>, <kjandasek@bedfordmi.org>, <jgore@bedford.org>

Township Board Members,

I'm attaching information from the Michigan Township Association regarding Campaign Finance Act compliance, further information would also be available under MCL 169.257(1). Multiple Board Members have violated these provisions multiple times. It is not lawful to use Township funds, Township owned space or other property to expressly advocate a vote for or against a candidate or ballot question. 'Expressly advocate' means to state support for the passage or defeat of a ballot question or the election or defeat of a candidate. In other words, to say "vote yes for" (or no) or "support" (or defeat) a candidate or ballot question.

The Board has egregiously violated the law most recently regarding the MCCC ballot issue. The vote has not yet occurred, the Board needs to take action to take responsibility for and rectify the situation as best they can. A notice and apology on the Township website and on the "Do You Know?" Township information published by Mr. Stump on Bedford Unleashed and the Bedford Community page, come to mind as possible steps forward.

Please respond with the actions you plan to initiate going forward, as well as if residents can expect compliance with the law in the future.

Respectfully,

Karen Flynn
Temperance

----- Forwarded message -----

From: **Karen Flynn** <kflynn172@gmail.com>

Date: Wed, Oct 22, 2025 at 8:56 AM

Subject: Getting the Word Out Campaign Finance_January 2024

To: Karen Flynn <kflynn172@gmail.com>

https://michigantownships.org/wp-content/uploads/Getting-the-Word-Out_Campaign-Finance_January-2024.pdf

Attachments:

- Getting the Word Out Campaign Finance_January 2024.pdf

[Spam?] Fw: board ballot comments

Thu 12/11/2025 2:37 PM

From: Cynthia Vincent**To:** Jacqueline Arvanitis

From: Cynthia Vincent <message4u.cv@gmail.com>**Sent:** Friday, November 7, 2025 8:29 AM**To:** aprieur@bedfordmi.org <aprieur@bedfordmi.org>; clindecker@bedfordmi.org <clindecker@bedfordmi.org>**Cc:** thershberger@bedfordmi.org <thershberger@bedfordmi.org>; Krista Jandasek <kjandasek@bedfordmi.org>;

jstump@bedfordmi.org <jstump@bedfordmi.org>; cmontri@bedfordmi.org <cmontri@bedfordmi.org>;

tbruning@bedfordmi.org <tbruning@bedfordmi.org>; jgore@bedfordmi.org <jgore@bedfordmi.org>;

pgoldsmith@lggplc.com <pgoldsmith@lggplc.com>; mkamprath@lggplc.com <mkamprath@lggplc.com>

Subject: board ballot comments

To the members of the Bedford Township Board, Trustees and legal counselors,

As a concerned member of this community of 35 years, I find it disturbing that members of this board continue to use their position to advise its citizens how to vote on the pending millage renewal for the MCCC and addressing the clerk to put it in bold in the minutes. This represents a violation of the Michigan Campaign Finance Act regarding township affairs.

According to information found in Section 57 MCFA:

Here's what individual board members may do as private individuals:

- Elected or appointed public officials or employees of a township may express their own personal views when they are not acting for the township, on their own personal time, expending their own personal funds, or providing their own personal volunteer services.

What a township board or board members must avoid doing:

- It is not lawful to use township funds, township-owned office space or other property to expressly advocate a vote for or against a candidate or ballot question. "Expressly advocate" means to state support for the passage or defeat of a ballot question or the election or defeat of a candidate. In other words, to say "Vote yes for" (or no) or "Support" (or defeat) a candidate or ballot question.

In addition, Trustee Bruning continues to reference "his shop" in some of his extended board comments : militias and party @ his shop, get your signs @ my shop. Mr.Bruning is the only gun shop in Bedford. It's advertising. Pick up a sign and while you're at it, maybe buy a flag, weapon or ammo.

These comments fall under your board code of ethics.

While it's too late to publicly rescind these comments, I would appreciate a response with measures to prevent such actions in the future.

Thank you,

Cynthia Vincent

message4u.cv@gmail.com

12/16/25, 3:53 PM

[Spam?] Fw: board ballot comments

400 W Temperance Rd, Temperance, MI 48182
419-450-4940



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

December 17, 2025

Phillip D. Goldsmith
OBO Craig Montri
Lennard, Graham & Goldsmith, P.L.C.
222 Washington Street
Monroe, MI 48161

Re: *Arvanitis v Montri*
Campaign Finance Complaint No. 25-115

Dear Phillip Goldsmith,

The Department of State has received a rebuttal to your response from Jacqueline Arvanitis regarding your client'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 Division
Bureau of Elections
Michigan Department of State

c. Jacqueline Arvanitis



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

February 26, 2026

Philip D. Goldsmith
Attorney for Craig Montri
222 Washington St.
Monroe, MI 48161
pgoldsmith@lggplc.com

Re: *Arvantis v. Montri*
Campaign Finance Complaint No. 25-115

Dear Mr. Goldsmith:

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

The complaint alleged that your client expressed their opposition to the community college millage during the October 7, 2025 and October 21, 2025 Bedford Township Board meetings. Additionally, your client urged others to vote against the millage.

You responded to the complaint on behalf of Mr. Montri. In your response, you claimed that Mr. Montri's public comments involved the incidental use of public resources. The incidental use of public resources did not rise to the level of a contribution or expenditure under MCFA. Alternatively, even if they were subject to MCFA restrictions Mr. Gore's comments were exempt under Section 57(1)(a) of the MCFA as protected public speech and MCL 169.257(1)(d) because the township building and meeting was equally available to members of the public for comments.

Additionally, you contend that Mr. Montri's public comments were an exercise of his first amendment right to free speech and laws that burden political speech are subject to strict scrutiny. Federal Election Commission v Wisconsin Right to Life, Inc., 551 U.S. 449, 127 S. Ct. 2652, 168 L.Ed. 2d 329 (2007). The state must have a compelling interest that is narrowly tailored to restrict a public officials free speech.

Lastly, with regards to Mr. Montri's personal Facebook page, you asserted that there is no use of public resources and therefore cannot be a violation of Section 57.

Jacqueline Arvantis provided a rebuttal statement. In that statement, Ms. Arvantis contends that the response reliance on the exemptions in Section 57 are misplaced. Specifically, Ms. Arvantis contends MCL 169.257(1)(a) does not apply because the opposition to the millage is outside the scope of Mr. Montri's policy making responsibilities required by the statute. The comments by Mr. Montri went beyond the expressions of his personal views by urging residents to vote a particular way on the proposal. Additionally, Ms. Arvantis argues that MCL 169.257(1)(d) does not apply because the comments were made during the "trustee comment period" and not during the public comment period of the meeting.

In Michigan, it is unlawful for a public body or an individual acting on its behalf to use or authorize the use of equipment, supplies, personnel, funds, or other public resources to make a contribution or expenditure. MCL 169.257(1). The words "contribution" and "expenditure" are terms of art that are generally defined to include a payment or transfer of anything of ascertainable monetary value made for the purpose of influencing or made in assistance of the qualification, passage, or defeat of a ballot question. MCL 169.204(1), 169.206(1). If not an individual, a person who knowingly violates this section is guilty of a misdemeanor punishable by a fine up to \$20,000 or a fine equal to the amount of the improper expenditure – whichever is greater. MCL 169.257(4).

The exemptions in Section 57 are limited to your role on the Bedford Township Board as it pertains to policy issues impacting your community. Additionally, the Department has previously issued an interpretive statement that addressed a similar situation. ([Interpretive Statement to Steven Daunt, Aug. 17, 2000](#)). This statement addressed a situation where a municipal council passed a resolution relating to the endorsement of a ballot. *Id.* The Department held that "[i]t is therefore clear that at council meetings individual council members are free to discuss their opposition to or support of a ballot question that relates to 'municipal concerns, property and government.'" *Id.*

Additionally, Attorney General Frank Kelley issued an opinion regarding the issue: "I am of the opinion that, while a commission or board may expend appropriated funds to inform the public in an objective manner on issues relevant to the function of the commission or board, it may not expend public funds to urge the electorate to support or oppose a particular candidate or ballot proposal." [Opinion No. 5597 \(November 28, 1979\)](#). These restrictions do not infringe on a public officials freedom of speech, but ensure that public resources aren't unfairly utilized to amplify the speech of public officials over the public.

The Department does not believe that the actions of Mr. Montri encouraging other members of the electorate to oppose the ballot initiative is an exceptions to MCFA, but even if there is any ambiguity, the legislative intent was to provide neutrality in these circumstances. The intent of the legislature in enacting the exceptions to MCFA were expressed in the enacting section to provide clarity in the event of any ambiguity.

" It is the policy of this state that a public body shall maintain strict neutrality in each election and that a public body or a person acting on behalf of a public body

shall not attempt to influence the outcome of an election held in the state. If there is a perceived ambiguity in the interpretation of section 57, that section shall be construed to best effectuate the policy of strict neutrality by a public body in an election."

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. Mr. Montri was within his right as a public official to express his personal opinions on policy issues pertinent to the community. However, the comments by Mr. Montri encouraging other members of the electorate to also oppose the proposal is beyond the expression of personal views that are exempt under section 57.

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.*

Please be advised that if the Department is unable to resolve this informally, it is required by MCL 169.215(10-11) to either refer to the Department of Attorney General with a request that her office prosecute for the criminal penalties and/or conduct an administrative hearing to enforce the civil penalties. If the Department conducts an administrative hearing, Section 169.215(11) authorizes the Secretary of State to seek a civil fine of triple the amount outlined, plus up to \$1,000.00 for each violation of the Act.

Please contact the undersigned at BOERegulatory@Michigan.gov by **Tuesday, July 7th, 2026**, to discuss a resolution to matter.

Sincerely,

A handwritten signature in cursive script that reads "James Biehl".

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

C: Jacqueline Arvantis



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

April 09, 2026

Philip D. Goldsmith
Attorney for Craig Montri
222 Washington St.
Monroe, MI 48161
Re: *Arvanitis v Montri*,
Campaign Finance Complaint No. 25-115

Dear Phillip Goldsmith:

As noted in a letter sent on February 26, 2026, the Department of State (Department) has finished investigating the campaign finance complaint filed against your client by Jacqueline Arvanitis alleging that your client violated the Michigan Campaign Finance Act (MCFA or Act).

As noted in the above letter, the Department reviewed the evidence submitted in this matter and found that sufficient evidence has been presented to support the finding of a potential violation of the MCFA. In Michigan, it is unlawful for a public body or an individual acting on its behalf to use or authorize the use of equipment, supplies, personnel, funds, or other public resources to make a contribution or expenditure. MCL 169.257(1). The words “contribution” and “expenditure” are terms of art that are generally defined to include a payment or transfer of anything of ascertainable monetary value made for the purpose of influencing or made in assistance of the qualification, passage, or defeat of a ballot question. MCL 169.204(1), 169.206(1). If not an individual, a person who knowingly violates this section is guilty of a misdemeanor punishable by a fine up to \$20,000 or a fine equal to the amount of the improper expenditure – whichever is greater. MCL 169.257(4).

The exemptions in Section 57 are limited to your role on the Bedford Township Board as it pertains to policy issues impacting your community. Additionally, the Department has previously issued an interpretive statement that addressed a similar situation. ([Interpretive Statement to Steven Daunt, Aug. 17, 2000](#)). This statement addressed a situation where a municipal council passed a resolution relating to the endorsement of a ballot. *Id.* The Department held that “[i]t is therefore clear that at council meetings individual council members are free to discuss their opposition to or support of a ballot question that relates to ‘municipal concerns, property and government.’” *Id.*

Additionally, Attorney General Frank Kelley issued an opinion regarding the issue: “I am of the opinion that, while a commission or board may expend appropriated funds to inform the public in an objective manner on issues relevant to the function of the commission or board, it may not expend public funds to urge the electorate to support or oppose a particular candidate or ballot proposal.” [Opinion No. 5597 \(November 28, 1979\)](#). These restrictions do not infringe on a

public officials freedom of speech, but ensure that public resources aren't unfairly utilized to amplify the speech of public officials over the public.

The Department does not believe that the actions of Mr. Montri encouraging other members of the electorate to oppose the ballot initiative is an exceptions to MCFA, but even if there is any ambiguity, the legislative intent was to provide neutrality in these circumstances. The intent of the legislature in enacting the exceptions to MCFA were expressed in the enacting section to provide clarity in the event of any ambiguity.

"It is the policy of this state that a public body shall maintain strict neutrality in each election and that a public body or a person acting on behalf of a public body shall not attempt to influence the outcome of an election held in the state. If there is a perceived ambiguity in the interpretation of section 57, that section shall be construed to best effectuate the policy of strict neutrality by a public body in an election."

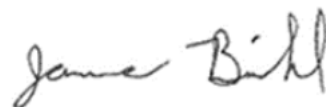
The Department has reviewed the evidence submitted in this matter and finds that sufficient evidence has been presented to support a finding of a potential violation of the MCFA. Mr. Montri was within his right as a public official to express his personal opinions on policy issues pertinent to the community. However, the comments by Mr. Montri encouraging other members of the electorate to also oppose the proposal is beyond the expression of personal views that are exempt under section 57.

The Department then began its informal resolution process as outlined in the letter. As a reminder, if no resolution is reached after 90 business days, then the Department will either refer this matter to the attorney general for the enforcement of any criminal penalty provided by this act or commence a hearing for enforcement of any civil violation. MCL 169.215(11).

You were given until **Tuesday, July 7th 2026** to contact the undersigned regarding an informal resolution. The Department is contacting you again because only 60 business days remain until the end of the informal resolution period. Again, please contact the undersigned at BOERegulatory@Michigan.gov by **Tuesday, July 7th 2026** to discuss a resolution to this matter.

If you do not, the Department will proceed with one of the options under MCL 169.215.

Sincerely,



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