



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 Paul J. Foust	Daytime telephone number (269) 203-6194	
Mailing address 8561 East D Avenue		
City Richland	State MI	Zip 49083
Email (recommended) Declined		

Section 2. Alleged Violator (Respondent)

Name Parchment School District		
Mailing address 520 North Orient Street		
City Parchment	State MI	Zip 49004
Email (recommended) Unknown		
Committee ID (optional) N/A		

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:

I allege that Parchment School District, in the process of campaigning for a "YES" vote on an upcoming millage, has intentionally violated Section 57 of the Michigan Campaign Finance Act.

The school district is using taxpayers' funds, in violation of Section 57, to produce yard signs that explicitly advocate a "YES" vote in the upcoming November 2025 election. One of the sign designs even includes verbiage that states "Paid for by Parchment Public Schools."

If the Michigan Bureau of Elections does determine that Parchment Schools has violated the MCFA, I intend to petition the 9th Circuit Court of Kalamazoo County to invalidate the results of the November 2025 election, based on fraud.



Signed: PAUL FOUST, 06 Oct. 2025.

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

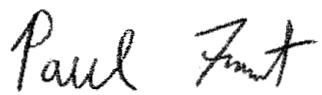
Enclosure 1: Sign Design #1

Enclosure 2: Sign Design #2

Both photographs were taken in Parchment, Michigan.

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.



10-06-2025

Signature of complainant

Date

Section 5. Certification without Evidence (Attachment 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

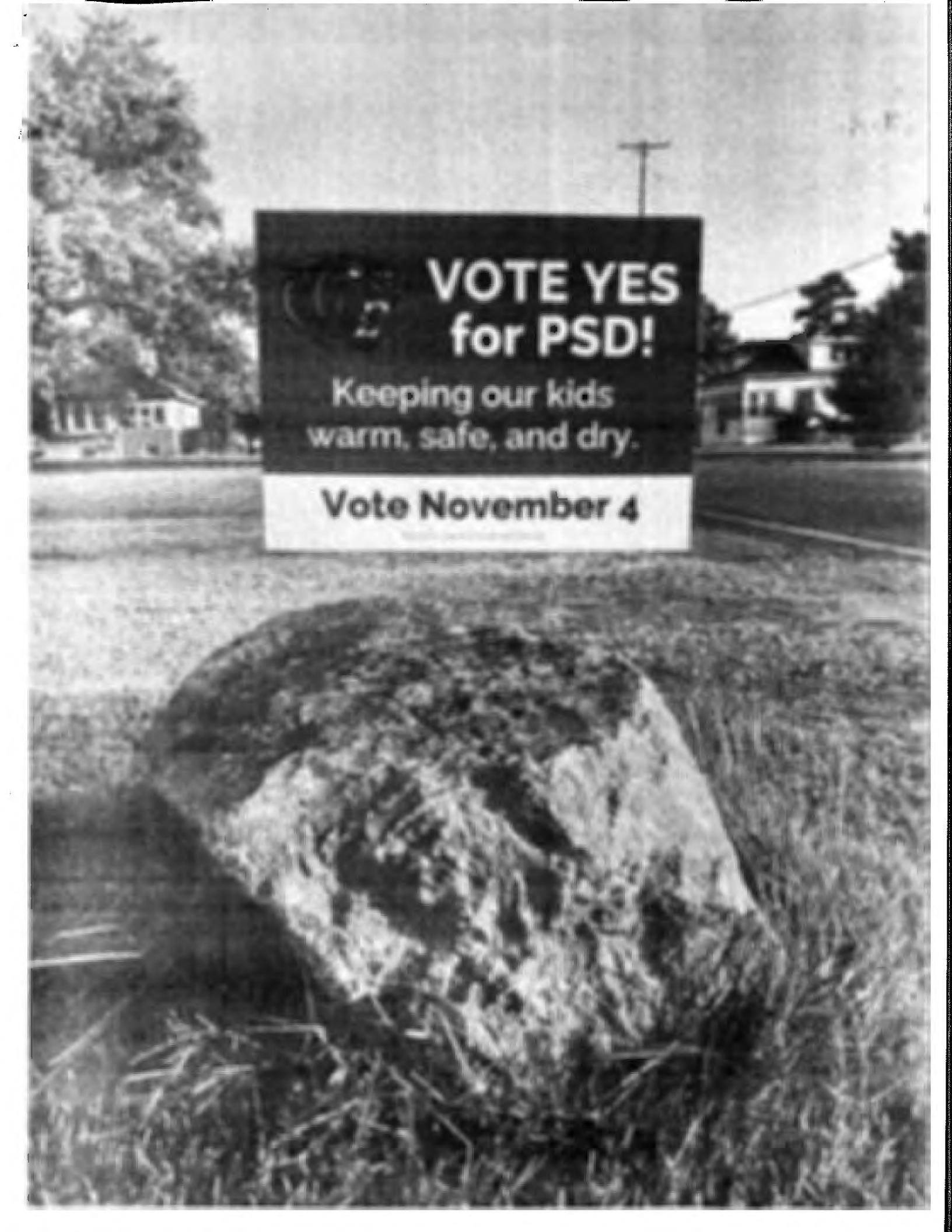
Section 15(8) of the MCFA provides that a person who files a complaint with a false certification is responsible for a civil violation of the MCFA. The person may be required to pay a civil fine of up to \$1,000 and some, or all, of the expenses incurred by the Michigan Department of State and the alleged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



A black and white photograph of a school building with children playing in the foreground.

**VOTE YES
for PSD!**

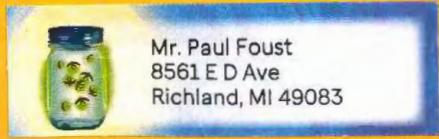
Keeping our kids
warm, safe, and dry.

Vote November 4



- ✓ YES TO SAFETY
- ✓ YES TO SCHOOLS
- ✓ YES TO STUDENTS

VOTE BY NOVEMBER 4TH



Mr. Paul Foust
8561 E D Ave
Richland, MI 49083

GRAND RAPIDS MI

6 OCT 2025 PM 6



State of Michigan
The Bureau of Elections
430 W. Allegan St.
Lansing, MI 48918

489181

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

October 16, 2025

Parchment School District
520 North Orient Street
Kalamazoo, Michigan 49004

Re: *Foust v. Parchment Public School District*
Campaign Finance Complaint No. 25-080

Dear Parchment School District:

The Department of State (Department) has received a formal complaint filed against you by Paul Foust alleging that you violated the Michigan Campaign Finance Act (MCFA or Act). Specifically, the complaint alleges that the Parchment School District is using public funds to produce materials that encourage voting for a bond proposal. 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 Paul Foust, 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: Paul Foust

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Parchment School District
520 North Orient Street
Kalamazoo, Michigan 49004



9590 9402 7453 2055 7825 78

2. Article Number (Transfer from service label)

7021 0350 0001 9995 7424

COMPLETE THIS SECTION ON DELIVERY**A. Signature****X***J. Desk* Agent
 Addressee**B. Received by (Printed Name)***J. Desk***C. Date of Delivery***10/00/05***D. Is delivery address different from item 1? Yes****If YES, enter delivery address below:** No**3. Service Type**

- Adult Signature
- Adult Signature Restricted Delivery
- Certified Mail®
- Certified Mail Restricted Delivery
- Collect on Delivery
- Collect on Delivery Restricted Delivery
- Insured Mail
- Insured Mail Restricted Delivery (over \$500)
- Priority Mail Express®
- Registered Mail™
- Registered Mail Restricted Delivery
- Signature Confirmation™
- Signature Confirmation Restricted Delivery

USPS TRACKING #
GRAND RAPIDS MI 493



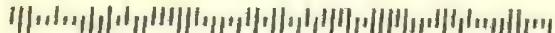
First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

9590 9402 7453 2055 7825 78

United States
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box*

RECEIVED/FILED BUREAU OF ELECTIONS
MICHIGAN DEPT OF STATE
2025 OCT 27 PM01:26 P.O. BOX 20126
ELECTIONS/GREAT LAKES
LANSING MI 48901-0726





Parchment School District
520 North Orient Street
Parchment, MI 49064
(269) 488-1050 PHONE
(269) 488-1060 FAX
www.parchmentschools.org

November 3, 2025

Via U.S. Mail and Email to
BOERegulatory@michigan.gov

Michigan Department of State
Bureau of Elections
Richard H. Austin Building, 1st Floor
430 West Allegan Street
Lansing, Michigan 48918

Re: *Foust v. Parchment Public School District*
Campaign Finance Complaint No. 25-080

Parchment School District (the "District") is in receipt of Campaign Finance Complaint No. 25-080 (the "Complaint"). This correspondence serves as the District's complete denial of the allegations made in the Complaint.

The District denies that any public resources were used to produce, disseminate, or publish either of the exhibits attached to the Complaint, as such there is no violation of Section 57 of the Campaign Finance Act (MCL 169.257). Further, Mr. Foust has not provided any evidence showing that the District used any of its equipment, supplies, personnel, funds, or any other public resources in connection with the alleged signs.

As to "Enclosure 1: Sign Design #1" the District did not use any public resources to produce, disseminate, or publish the sign/flyer. Mr. Foust has not provided any evidence that the District produced that item, and the District affirmatively denies any of its resources were used in the production or dissemination of that item. Mr. Foust has not provided any evidence supporting the allegation.

The District believes Sign Design #1 is not a yard sign as described by Mr. Foust, and that it is from a social media post by a group known as Friends of Parchment Schools. This group is not affiliated with the District nor has the District requested that Friends of Parchment Schools take any action on behalf of the District.

As to "Enclosure 2: Sign Design #2" the District also asserts that it did not use any public resources to produce, disseminate, or publish the sign. The District is unaware of any sign that reads: "Paid for by Parchment Public Schools" and further notes that the District's legal name is actually "Parchment School District," as it appears in the District's Bond Proposal on the November 4, 2025 ballot.

Michigan Department of State
Bureau of Elections

November 3, 2025

Page 2 of 3

In the community there are signs similar to the picture of Sign Design #2 provided in the Complaint, but these signs clearly read: "Paid for by Friends of Parchment Schools." (See Exhibit A). As noted above, Friends of Parchment Schools is not affiliated with the District nor has the District requested that Friends of Parchment Schools take any action on behalf of the District.

The copy of "Sign Design #2" provided in the Complaint is illegible and does not show the words alleged in the Complaint. In any event, the District denies that it used any public resources to produce, disseminate, or publish Sign Design #2.

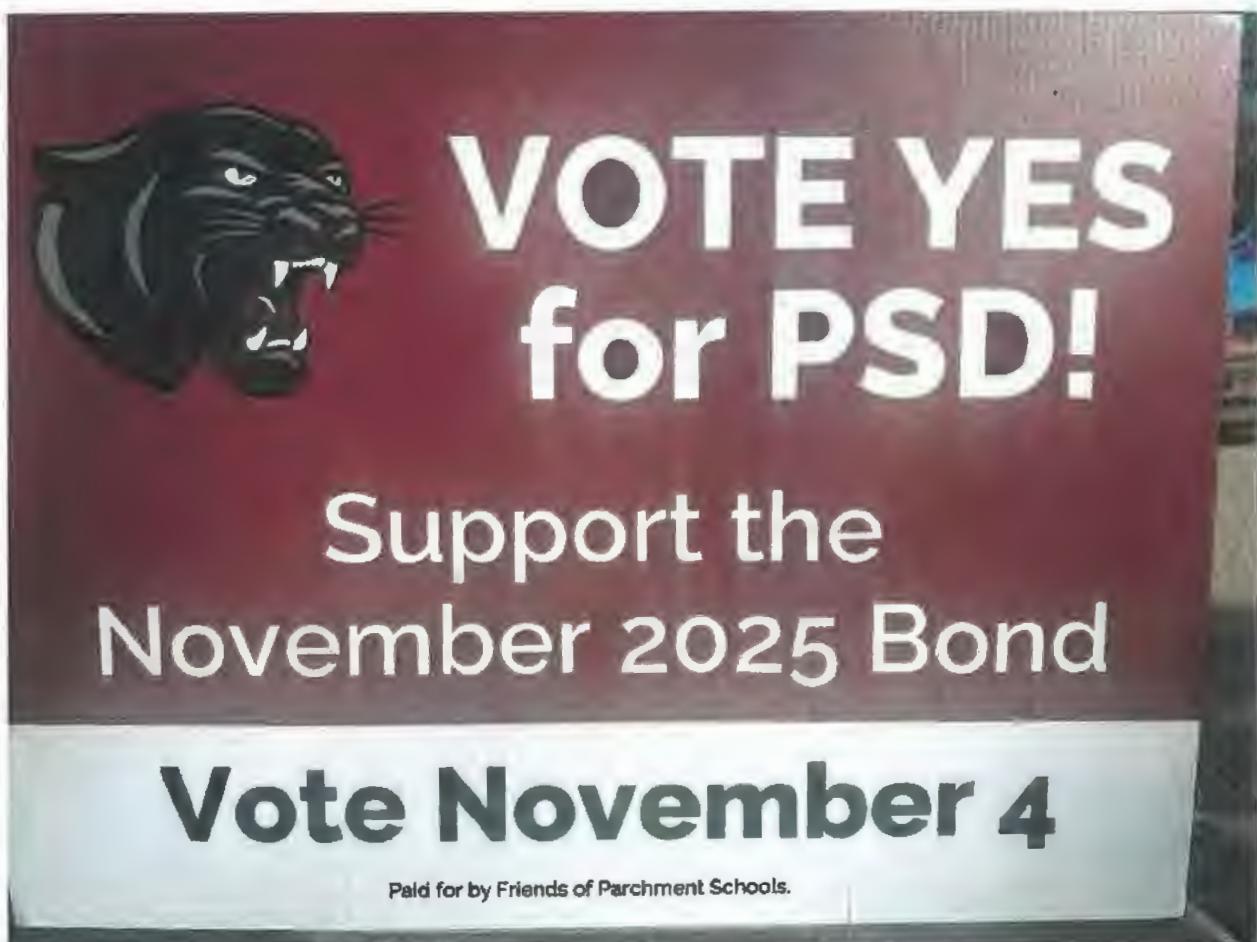
The District did not produce, disseminate, or publish Sign Design #1 or Sign Design #2, and the Complaint contains no evidence showing that the District violated Section 57 of the Campaign Finance Act. The District further denies that it is in the process of advocating for a "yes" vote on its Bond Proposal. The District requests that Complaint No. 25-080 be dismissed. Should additional evidence be provided in connection with this matter the District reserves the right to respond accordingly.

Very Truly Yours,



Dr. Sarah Neumann
Superintendent of Schools

EXHIBIT A





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

November 3, 2025

Paul J Foust
8561 East D Ave
Richland, MI 49083

Re: *Foust v Parchment Public School District*
Campaign Finance Complaint No. 25-080

Dear Paul Foust,

The Department of State received a response from Parchment Public Schools 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: Parchment Public School District

Paul Foust
P.O. Box 112
Richland, MI 49083-0112

November 3, 2025

State of Michigan
The Bureau of Elections
430 W. Allegan St.
Lansing, MI 48918

Re: Rebuttal Statement: Foust v. Parchment School District MCFA Complaint (2025)

To Whom It May Concern:

Please accept this letter as the official Rebuttal Statement in the aforementioned case. The School District's theory that the "Friends of Parchment" 501(c)3 is the producer of the campaign materials is not valid. The "Friends of Parchment" lost its 501(c)3 status in 2010 and became defunct in 2011; the "Friends" do not exist as a separate legal entity. Some of the campaign materials in question bear the address of "520 North Orient Street," which is the address of the Parchment School District and not that of the now-defunct "Friends" 501(c)3.

For these reasons, I maintain my original allegation: that Parchment School District has violated the MCFA by helping to produce campaign materials that explicitly advocate a "yes" vote on the upcoming millage question. Since this matter concerns an election ballot date that is quickly approaching, I am asking the Michigan Bureau of Elections to expedite its investigation of this matter, in order to ensure a fair resolution/outcome for all parties.

Kind Regards,

Paul Foust
(269) 203-6194
paul.j.foust@wmich.edu

FRIENDS OF THE PARCHMENT COMMUNITY

EIN: 38-6100032 | Parchment, Michigan, United States

Auto-Revocation List

Organizations whose federal tax exempt status was automatically revoked for not filing a Form 990-series return or notice for three consecutive years.

Important note: Just because an organization appears on this list, it does not mean the organization is currently revoked, as they may have been reinstated.

Exemption Type: 501(c)(3) [?](#)

Exemption Reinstatement Date:

Revocation Date: 05-15-2010

Revocation Posting Date: 06-09-2011



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

November 5, 2025

Dr. Sarah Neumann
520 North Orient Street
Parchment, Michigan 49004

Re: *Foust v Parchment Public School District*
Campaign Finance Complaint No. 25-080

Dear Dr. Sarah Neumann:

The Department of State has received a rebuttal to your response from Paul J Foust 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 Division
Bureau of Elections
Michigan Department of State

c. Paul J Foust



Parchment School District
520 North Orient Street
Parchment, MI 49004
(269) 488-1050 PHONE
(269) 488-1051 FAX
www.parchmentschools.org

November 7, 2025

Via U.S. Mail and Email to
BOERegulatory@michigan.gov

Michigan Department of State
Bureau of Elections
Richard H. Austin Building, 1st Floor
430 West Allegan Street
Lansing, Michigan 48918

Re: *Foust v. Parchment Public School District*
Campaign Finance Complaint No. 25-080

Parchment School District (the “District”) received the rebuttal statement filed by the Complainant in this matter. The rebuttal statement seems to contain new allegations that are not supported by any evidence previously provided to the Bureau of Elections and as such Complaint No. 25-080 should be dismissed.

In his rebuttal, Complainant makes a new allegation that: “[S]ome of the campaign materials in question bear the address of ‘520 North Orient Street’.... Neither of the two exhibits submitted by the Complainant in Complaint No. 25-080 support this new allegation that *Friends of Parchment Schools* used the District’s address on its materials, and the District is unaware of any such materials. Further, even if *Friends of Parchment Schools* had used the District’s address, it would have done so without the District’s express permission.

The District denies using any public resources for the benefit of *Friends of Parchment Schools*, and Complainant has provided no evidence to the contrary.

Should additional evidence be provided related to Complaint No. 25-080 the District reserves the right to formally respond. Further, should the Bureau of Elections consider the additional allegations contained in the rebuttal the District requests that a new complaint process be initiated. Thank you for your attention to this matter.

Very Truly Yours,

Dr. Sarah Neumann
Superintendent of Schools



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

January 15, 2026

Parchment School District
520 North Orient Street
Kalamazoo, Michigan 49004

Re: *Foust v. Parchment Public School District*
Campaign Finance Complaint No. 25-080

Dear Parchment School District:

The Department of State (Department) received a formal complaint filed against you by Paul Foust alleging that you violated the Michigan Campaign Finance Act (MCFA or Act). This letter concerns the disposition of that complaint.

The complaint alleged that the Parchment School District used public funds to produce materials that encouraged voting for a school bond proposal. In support, the complaint attached two pages: one, a photograph of a yard sign saying “Vote Yes for PSD! Keeping our kids warm, safe, and dry. Vote November 4” as well as language at the bottom too blurry to read, and another, an image that says “Parchment Bond November 2025,” “Yes to Safety Yes to Schools Yes to Students,” and “Vote by November 4th.” *Complaint*, pp. 5-6.

You responded through your superintendent, who denied the allegations. The response attached a clearer photograph of the yard sign, which made clear the language at the bottom. It reads “Paid for by Friends of Parchment Schools.” *Response*, p. 3. You noted that the image was from a social media post by a group called Friends of Parchment Schools, one not affiliated with the school, and that the school had not given it any direction to act. You disclaimed any responsibility for either sign, and noted no evidence was submitted to support the claim that the school was responsible for the creation of either sign.

Paul Foust provided a rebuttal. He argued that your response that the “Friends of Parchment” group was responsible for the signs was “not valid” because a non-profit entity called “Friends of Parchment” lost its nonprofit status and is now defunct. He also argued that “some of the campaign materials in question bear the address of ‘520 North Orient Street,’ which is the address of the Parchment School District and not that of the now-defunct ‘Friends’ 501(c)(3).” *Rebuttal*, p. 1. In support, he attached a print-out from the IRS for a group called Friends of the Parchment Community. *Id.*, p. 2. No other evidence was provided.

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 Department has reviewed the evidence submitted in this matter and finds that insufficient evidence has been presented to support a finding of a potential violation of the MCFA. As detailed below, there is no evidence that you or an individual acting on your behalf made a contribution or expenditure regarding the school bond and therefore there cannot be a misuse of public resources in violation of Section 57 of MCFA.

There are two images at issue. The first, the yard sign which the complainant designated as “Sign Design #1,” is clearly identified in the response as being paid for by a group called Friends of Parchment Schools. The second, the image designated as “Sign Design #2,” bears no paid for language at all, but appears to be associated with a Facebook page called “Friends of Parchment – November 2025 Bond Proposal.” You disclaimed responsibility for both signs. The rebuttal responds by noting an entity with a different name, called Friends of the Parchment Community, no longer active, allegedly used the school’s address, but no proof of this allegation is provided. This group also has a different name than the one that appears to have created both of these images - Friends of Parchment Schools.

No evidence regarding Friends of Parchment Schools has been submitted, nor evidence of coordination between it and you. Because the Department lacks any evidence connecting you to either image or the Friends of Parchment Schools, it cannot assume that you created these images or used public resources to do so.

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,



Callie E. Dendrinos, Regulatory Attorney
Regulatory Division
Bureau of Elections
Michigan Department of State

c: Paul Foust