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

Act (financial disclosure acts). Electronic submission of the form to <u>BOERegulatory@michigan.gov</u> is strongly recommended. For instructions on how to complete this form, see the <u>Campaign Finance and Financial Disclosure Complaint Guidebook</u> document. All spaces are required unless otherwise indicated.

Section 1. Complainant								
Your name	а	Daytime telephone number	13					
Kevin Gordish	734-837-1448							
Mailing address		3	3					
34139 Birchwood Street			7.					
City Westland	State MI	Zip 48186	ci -	= 8				
Email (recommended) kgordish@yahoo.com		,						
Section 2. Alleged Violator (Respondent)								
Name								
Kevin Coleman								
Mailing address 1165 Shoemaker								
City Westland	State MI	Zip 48185						
Email (recommended) kevincolemancc@gmail.com								
Committee ID (optional) 519255								
Please include email addresses to e	xpedite processing time an	d mitigate mail delays.						
Section 3. Allegations (use additional sheets if	more space is needed)							
allege a violation of the following:								
✓ MCFA		19						
☐ 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:

MCL Section 169.233 Campaign Statements, filings incomplete statements.

"If a candidate, treasurer, or other individuals designated as resposnible for a committee's record keeping knowingly files an incomplete or inacurrate statement"

MCL Section 169.236 A committee supporting or opposing a candidate for local elective office, if the office is to be voted on in more than 1 county but not statewide, shall file a copy of the campaign statement required under this act with the clerk of the county...

MCL Section 169.208 Definitions H, I

"independent committee...receives contributions from at least 25 persons"

Michigan Campaign Finance Training:

Where does a PAC register? https://www.michigan.gov/-/media/Project/Websites/sos/09diljak/PAC1.pdf? rev=462aff67f09644b9b189e2c5ef8dc97f

County Level: Committees whose activity is restricted to local candidates and issues within one county will register with their county clerk

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

I am writing to file a complain agaist the "KEVIN COLEMAN FUTURE LEADERS FUND".

It appears there might be a delibrate attempt to obscure the identity of the committee responsible for mailing a piece of campaign mail. Please see attached evidence.

- 1. Mailer 1 uses an acronym instead of the committee name spelled out.
- 2. Mailer 1 uses a PO Box 85062 Westland MI 48185

Mailer 2 spells out Paid for by "Kevin Coleman Future Leaders Fund" and lists his home address 1165 Shoemaker Drive Westland MI 48185

PO Box 85062 is not listed in the campaign filings for committe 519255.

Second it appears the Committee should not be registered as an "Indepedent Committee". It has fewer than 25 contributors per calendar year. See attached.

The filed expenses seem to related to the past Westland Mayor Race and City County and is not registered with Wayne County. Michigan campaign finance instructional materials state Committees whose activity is restricted to local candidates and issues within one county will register with their county clerk

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.

10/3/2025

MDOS Campaign Finance & Financial Disclosure Complaint Form (Rev. 04/24)

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 from the support of the suppor	
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

Committee Details

519255 - KEVIN COLEMAN FUTURE LEADERS FUND

Committee Information Members and Addresses	Receipt ID	Receipt Category	Loan	Is the Loan Forgiven?	Election	Name	Date	Amount	Qualifying Contribution?	Qualifying Amount	Schedule
Fees	25-275293	Direct Contributions		N/A		Hamade, Zeinab	04/10/2025	\$2,000.00	N/A		- 1
Notifications		Contributions				LCII IOO					- 1
Filings	25-275278	Direct Contributions		N/A		Holland, Doug	04/10/2025	\$2,450.00	N/A		ı
Campaigns											
Public Funding Schedules	25-275261	Direct Contributions		N/A		Buccilli, Ken	04/09/2025	\$4,000.00	N/A		
Fundraisers		Direct									
Receipts	25-275105	Contributions		N/A		Speaks, Jeff	04/08/2025	\$2,450.00	N/A		

- 4 Contributors (so far) in 2025 (Mayor)
- 9 Contributors in 2024 (Mayor)

Greater than 25 Contributors in 2023 (when in the Michigan House)

Unity Strength FOR WESTLAND



A Message From Mayor Coleman

Antoinette Martin

Finance Professional with Decades of Volunteer Service to Westland

BSBA - EMU, 30 Year Career in Financial Planning

Worked to Build & Secure Retirements for **100's of Working Families**

Served on several City Boards & Commissions

Spearheaded efforts to build Library, Tattan

Park updates, Farmers Market, New Pavilions Across the City, Improve Services

Library Board, Westland

Rotary, Brownfield

Redevelopment Board,

HOA Board Member, Westland Chamber of

Commerce

CITY COUNCIL ELECTION TUESDAY, NOVEMBER 4TH CANDIDATES WORKING TOGETHER FOR A STRONGER WESTLAND

Maxwell | Public Health Professional & Veterans Services Advocate



MBA - Walsh College

Project Director - Wayne County Department of Public Health

Board Member: Westland Municipal Services Bureau, Housing Commission, **Taylor Tower Commission, TIFA**

U of M - Health & Retirement Study

Small Business Management Experience

University of Michigan Research Administrator 2008-2021





Antoinette >

For City Council









Mayor Coleman









Sullivan Attorney at Law & former Wayne County Commissioner

BA - University of Michigan

University of Detroit Mercy Law School, Juris Doctorate

Practiced Law for 30+ Years, Small Business Owner

Wayne County Commissioner 1999-2007

Westland Board of Review, LDFA, Westland Historical Society





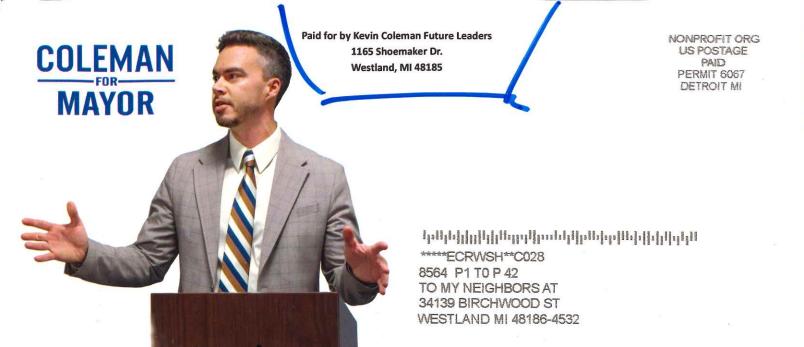
Bauman | Councilwoman, Mother & Expert in Government Operations

SEMCOG Legislative Council, Vice-Chair Nankin Transit Commission MML Elected Officials Academy, Economic Land Use & Development Committee



Small Business Owner 12+ Years Graduate of Schoolcraft College Elected to City Council in 2023





Dear Neighbor,

I am honored to continue serving as Westland's Mayor while dedicating myself to making sure our City has a promising future. Although I am running unopposed in this year's election, it's crucial we support City Council candidates who have a history of professionalism, a willingness to work together without personal attacks & most of all- we need a City Council that is qualified to lead our city forward.

My administration and I have worked hard to secure \$16 Million in additional grant funding for Westland in the last 2 years to re-invest in essential services such as Fire Station reconstruction projects, record Firefighter and EMS staffing levels, Police Department enhancements, a new amphitheater near City Hall, park improvements in our neighborhoods and much more. I'm proud to share we've accomplished all this while reducing our tax millage rate.

It is important we support candidates who have committed to engaging with the Mayor's Office and residents on our shared vision for Westland's future. That is why I am strongly endorsing Antoinette Martin, LeKisha Maxwell, John Sullivan and Emily Bauman in the 2025 Westland City Council Election. Please consider these qualified candidates when deciding on your 4 votes on or before November 4th. Thank you for your continued support!

Mayor Kevin Coleman

- Kevin Coleman



LONDEAU DRAGGED WESTLAND THROUGH THE MUD IN STATEWIDE NEWS COVERAGE...

THEN HE WAS VOTED OUT OF OFFICE...

NOW HE WANTS TO MAKE A COMEBACK TO CITY COUNCIL

Video Clips Raise New Questions About Londeau

"featured a series of crude jokes referencing female genitalia, sexually transmitted diseases and other vulgar content"



Ross Jones May 1st, 2023

Londeau's Comments Spark Controversy

"Interim Mayor's profanity-laced footage... features racist comments"



Londeau Facing Calls to Resign by Group of Residents Accusing Abuse of Power

"Westland activist group calls for Londeau's resignation"



Dave Spencer May 1st, 2023

Londeau Facing Calls to Resign

"Londeau has a long history of inappropriate behavior that can no longer be ignored."



Londeau Confronts Sterling Hts Councilman at Hotel Bar

"Londeau used the N-Word & tried to make a joke off a line used by African-American actor Gary Coleman, what you lookin at Willis"



October 23rd, 2023, MIRS Lansing

STOP THE NEGATIVE HEADLINES AND EMBARRASSMENT!

PRSRT STD US POSTAGE PART PERMIT 6067 DETROIT MI

STOP THE NEGATIVE HEADLINES

WESTLAND CAN'T AFFORD ANYMORE FOOLISH ANTICS ON CITY COUNCIL AND EFFORTS BY HIS BUDDIES TO BLOCK PROGRESS FOR POLITICAL GAIN. VOTE "NO" ON LONDEAU!



WOTE
NOV. 4TH

REJECT LONDEAU.

From: Kevin Gordish PhD
34139 Birchwood
Westland Mi 48186

Retail





U.S. POSTAGE PAID FCM LETTER WESTLAND, MI 48185 OCT 03, 2025

48912

\$1.07

RDC 99

S2324A500952-12

Ready Post.

Document Mailer

Michigan Deportment of State
Bureau of Electrons
Richard Austin Building
430 West Allegan Floor 1
Lansing M148912



93300006 6" x 9" Envelope

1PJE2150 · AIC-093
Product Code 93300006
www.usps.com
A product of the United States Postal Service ®
MADE IN THE U.S.A.



1175 + 2025

OCT 2025 PM 8 L



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

October 17, 2025

Kevin Coleman 1165 Shoemaker Westland, MI 48185

Re: Gordish v. Coleman

Campaign Finance Complaint No. 25-081

Dear Kevin Coleman:

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 mailers from your committee included with the complaint; a copy of the complaint is enclosed. Specifically, one of the mailers failed to include a complete name and incorrect address of the entity paying for the campaign material. Additionally, the complaint alleges that Kevin Coleman Future Leaders violated Section 8, 23, & 36 by failing to meet the requirements of an independent committee and not filing at the local level.

With regards to the allegations of Sections 8, 23, & 36 of MCFA the Department is dismissing these allegations. To qualify as an independent committee under Section 8 a committee must receive contributions from at least 25 persons and make expenditures supporting at least 3 candidates in a calendar year. The Department has previously issued an interpretive statement indicating that these requirements only apply to the initial eligibility of an independent committee. "Utilization of the past tense leads to the conclusion that once the contribution and expenditure requirements have been met in one calendar year, they need not be met in subsequent calendar years." *Interpretive Statement to James E. Defebaugh*, March 29, 1978.

Additionally, an independent committee is not registered to support or oppose a single candidate which would require them to file at the local level under Section 36(4) of MCFA. The independent nature of their committee and potential to support candidates across county lines requires them to file with the Department under Section 36(6).

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

¹ Defebaugh 1978.pdf

Gordish v Coleman Page 2

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 Division Bureau of Elections Michigan Department of State

c: Kevin Gordish