

Campaign Finance Complaint Form
Michigan Department of State

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MICHIGAN DEPT OF STATE
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This complaint form may be used to file a complaint alleging that someone violated the Michigan Campaign Finance Act (the MCFA, 1976 PA 388, as amended; MCL 169.201 *et seq.*).

All information on the form must be provided along with an original signature and evidence.

Please print or type all information.

I allege that the MCFA was violated as follows:

Section 1. Complainant		
Your Name David Baetens	Daytime Telephone Number 248-625-6426	
Mailing Address 6789 Deerhill Drive		
City Clarkston	State MI	Zip 48346

Section 2. Alleged Violator		
Name Tracy Bartolomeo candidate / Bartolomeo for Commissioner		
Mailing Address 880 Artdale Drive		
City White Lake	State MI	Zip 48383

Section 3. Alleged Violations (Use additional sheet if more space is needed.)
--

Section(s) of the MCFA violated:
MCL 169.247 Section 47 (1)

Explain how those sections were violated:

The Bartolomeo campaign has failed in multiple instances to fulfill their legal obligation to provide a complete identification statement informing the public of the source of funding of campaign materials as required by law. These violations include: 1) the campaign sponsored website (no identification statement); 2) campaign sponsored yard signs (no committee address); 3) printed campaign literature (no identification); 4) paid newspaper advertisements (no committee address)

Evidence that supports those allegations (attach copies of pertinent documents and other information):

1. Website: tracybartolomeo.com has been designated the official campaign website per the candidate's Statement of Organization filed at the Oakland County Clerk's Office on 4/16/18 (attached).

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.

X


Signature of Complainant

4/29/18
Date

Section 5. Certification without Evidence (Supplemental to Section 4)

Section 15(6) of the MCFA (MCL 169.215) requires that the signed certification found in section 4 of this form be included in every complaint. However, if, after a reasonable inquiry under the circumstances, you are unable to certify that certain factual contentions are supported by evidence, you may also 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:

X

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 \$1,000.00 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.

Mail or deliver the completed complaint form with an **original signature and evidence** to the following address:

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

(continued)

The website tracybartolomeo.com is clearly established to advocate the election of Ms. Bartolomeo to the Oakland County Commission. The site presents her platform, provides a portal for volunteer sign-ups and directly solicits for campaign donations. In direct violation of Section 47 of MCFA, there is a complete failure to disclose on any page of the site the name or address of the campaign that is hosting the website. Screenshots of the website are attached.

2) Campaign yard signs. Photographs of the Bartolomeo campaign yard signs are attached. As evidenced in these photographs, the campaign has failed to fulfill Section 47 of MCFA, requiring the inclusion of the committee address within the identification statement.

3) Printed campaign materials. Photographs of Bartolomeo campaign door hangers are attached. As evidenced in these photographs, the campaign has failed to fulfill Section 47 of MCFA, requiring the inclusion of a "Paid for by" or identification statement that would inform the public the source of the funding for these electioneering materials. These materials clearly originated from the campaign and the source of these photos was a Facebook posting by a supporter of the campaign.

4) Newspaper advertisement. Photographs of an advertisement placed in the June 27, 2018 edition of the West Oakland Spinal Column newspaper are attached. Once again, the Bartolomeo campaign failed to fulfill Section 47 of the MCFA requiring the inclusion of the committee address in the identification statement as required by law.

These actions demonstrate a careless disregard for the accountability measures incorporated in Michigan election law to ensure the public has a right to know who is influencing the outcome of elections. I ask that the Bureau of Elections act to bring the Bartolomeo campaign and their election advertisements into compliance with the law.

Exhibits:

Relating to campaign website

TB1-1: Bartolomeo Campaign Statement of Organization naming tracybartolomeo.com as campaign website

TB1-2/1-3/1-4/1-5: These are pdf screenshots of the campaign website

Relating to the yard signs

TB2-1 Wide shot of Bartolomeo campaign signs

TB2-2 Close-up photo showing identification statement lacks address

Relating to printed electioneering materials

TB3-1 Screenshot of Facebook post of supporter and candidate with literature

TB3-2 Photo of side 1 of printed campaign material

TB3-3 Photo of side 2 of printed campaign material

Related to newspaper advertisements

TB4-1 Photo of full ad in Spinal Column on 6/27/18

TB4-2 Photo close up showing identification lacks address



MICHIGAN DEPARTMENT OF STATE
BUREAU OF ELECTIONS

ORIGINAL OR AMENDED
STATEMENT OF ORGANIZATION FORM FOR LOCAL CANDIDATE COMMITTEES FILED WITH A COUNTY CLERK
Information on this form is made public.

1. Committee ID #: 96967	*2. Type of Filing: <input checked="" type="checkbox"/> Original: <input type="checkbox"/> Amendment to items:		Eff. Date: 3/16/2018
*3. Full Name of Committee (must include Candidate's first and last name): TRACY BARTOLOMEO FOR COMMISSIONER			
*4a. Candidate Full Name: Last Name BARTOLOMEO	First Name TRACY	M.I.	
*4b. Political Party (if applicable): REPUB	*4c. County of Residence: OAKLAND		
*4d. Office Sought: OAKLAND COUNTY COMMISSIONER	*4e. District or Jurisdiction: 6th DISTRICT		
*5. Date Committee was Formed: 4/16/18			
*6a. Committee Phone: 248 563-0648	6b. Committee Fax #: N/A		
*6c. Committee Email Address: tracybartolomeo@comcast.net	6d. Committee Website Address: tracybartolomeo.com		
*7a. Complete Committee Mailing Address (May be PO Box): 880 ARDALE DR. WHITE LAKE, MI 48383			
*7b. Complete Committee Street Address (May not be PO Box): SAME AS ABOVE			
*8. Treasurer Name and Complete Address: JULIE GRILL 2263 Karen Dr. Howell, MI 48855			
Phone #: 248 563-0648	Email Address: JULIERICKGRILL@gmail.com		
9. Designated Record Keeper Name and Complete Address: Not applicable			
Phone #:	Email Address:		
*10. REPORTING WAIVER REQUEST: <input type="checkbox"/> YES, I/We WANT TO APPLY FOR THE REPORTING WAIVER. The committee does not expect to receive or expend in excess of \$1,000 in an election. I/We understand that if the committee does not spend or received in excess of \$1,000 in an election, the committee does not owe Pre, Post and Quarterly Campaign Statements. I/We further understand that the Reporting Waiver will be automatically lost if the committee exceeds the \$1,000 threshold and all required campaign statements must be filed. A Reporting Waiver does not exempt a committee from filing Late Contribution Reports. <input checked="" type="checkbox"/> NO, I/We DO NOT WANT TO APPLY FOR THE REPORTING WAIVER. The committee expects to receive or expend in excess of \$1,000 in an election. I/We understand that the committee owes Pre, Post, Quarterly Statements even if the committee does not spend or receive in excess of \$1,000 in an election. I further understand that the Reporting Waiver cannot be requested retroactively to avoid filing requirements and to avoid paying late filing fees. Further information regarding Reporting Waivers can be found in Appendix C of the Committee Manual.			
*11. Name and Address of Depositories or Intended Depositories of committee funds. (Michigan Bank, Credit Union or Savings & Loan Association) While this item must be completed, an account does not have to be opened until the first contribution is received. *Official Depository (name and address): PNC BANK 2350 EAST GRAND RIVER, HOWELL, MI 48843 Secondary Depository (name and address):			
12. Verification: I/We certify that all reasonable diligence was used in the preparation of the above statement and that the contents are true, accurate and complete to the best of my/our knowledge or belief. If filing campaign statements electronically, we further agree that the signatures below shall serve as the signatures that verify the accuracy and completeness of each statement filed electronically by the committee. I/We certify that all reasonable diligence will be used in the preparation of each statement electronically filed by this committee and that the contents of each statement will be true, accurate and complete to the best of my/our knowledge or belief. (Sign Name and Date)			
*Candidate: Tracy Bartolomeo	Date: 3/24/18	*Current Treasurer: Julie Grill	Date: 3-24-18
*Designated Record Keeper (If Applicable): N/A	248 563-0		Date:

TRACY BARTOLOMEO

for Oakland County Commissioner, 8th District

**DONATE
TODAY!**

HOME

MEET TRACY

PLATFORM

GET INVOLVED

DONATE



We are witnessing turmoil in today's political climate. Our constitutional rights are under attack. We need representatives at all levels of government to put our families first. That is the reason I'm running for Oakland County Commissioner.

Please join in and help
make a difference!

Name *

Email *

Subject

Message

send

Our Goals

- Improve our Roads
- Financial transparency & integrity
- Prevent Human Trafficking
- Vote Integrity
- Stop Property Confiscation
- Improve School Safety

HOME

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PLATFORM

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CONTACT

EMAIL: tracybartolomeo@comcast.net



**DONATE
TODAY!**

TRACY BARTOLOMEO

for Oakland County Commissioner, 6th District

**DONATE
TODAY!**

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I'm a wife, mom and engineer. As a civil engineer, I was educated in highway design and environmental engineering. I've been a Master Technical Problem Solver for more than a decade at one of the largest automotive manufacturers in the world. I have a statistics background with a Six Sigma Black Belt.

I'm an usher at my church and have been on several mission trips. I love being a bee keeper and working in my vegetable garden.

My two favorite quotes are, "evil thrives when good people do nothing." and "Making the simple complicated is easy. Making the complicated simple is brilliant."

*Please join in and
help make a difference!*

Name *

Email *

Subject

Message

send



CONTACT

EMAIL: tracybartolomeo@comcast.net



**DONATE
TODAY!**

TRACY BARTOLOMEO

for Oakland County Commissioner, 5th District

**DONATE
TODAY!**

HOME

ABOUT TRACY

PLATFORM

GET INVOLVED

CONTACT

Financial Transparency & Integrity

Transparency is the foundation of trust. I will ensure that all financial transactions are open and accountable to the public.



Prevent Human Trafficking

Human trafficking is a heinous crime. I will work to prevent it and support victims.



Vote Integrity

I will ensure that every vote is counted and that the electoral process is fair and transparent.



Improve Infrastructure

I will work to improve our infrastructure, including roads, bridges, and public transit.



School Safety

I will work to ensure that all schools are safe and secure for students and staff.



Stop Property Confiscation

I will work to stop the confiscation of property without proper legal process.



Please Join in and
help make a difference!

Name *

Email *

Subject

Message

send

CONTACT

EMAIL: tracy@bartolomeo.com



**DONATE
TODAY!**

© 2014 Tracy Bartolomeo

TRACY BARTOLOME

for Oakland County Commissioner, 8th District

DONATE
TODAY!

HOME

MEET TRACY

PLATFORM

GET INVOLVED

DONATE



Please Donate
\$500.00



Please Donate
\$250.00



Please Donate
\$100.00



Please Donate
\$50.00



Please donate
\$25.00

CONTACT

EMAIL: tracybartolome@comcast.net



DONATE
TODAY!

© 2011 Tracy Bartolome

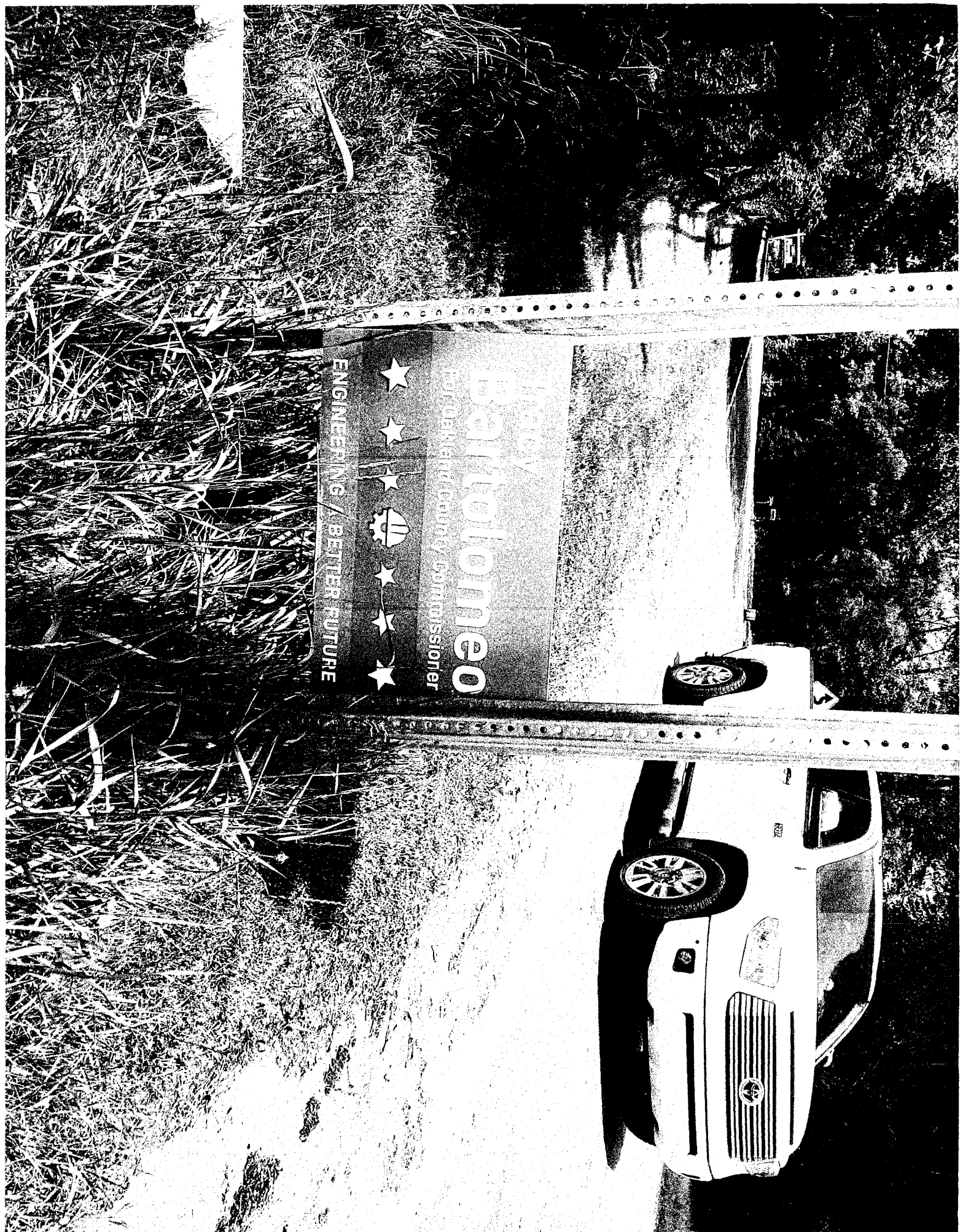


SPE
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Mayor
Barbatoomeo
for Oakland County Commissioner

★ ★ ★ ★ ★

ENGINEERING / BETTER FUTURE



NGA BETT

Paid for by Tracy Bartolomeo for Commissioner

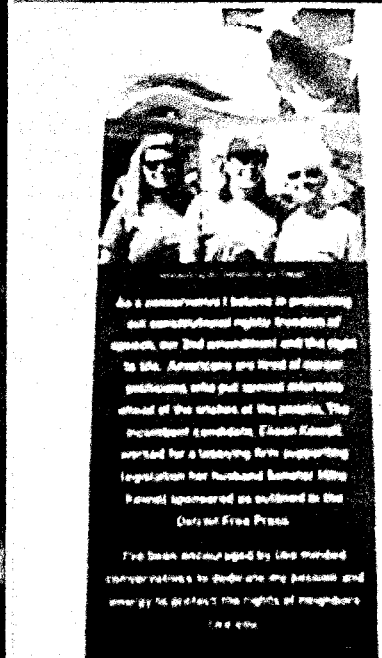
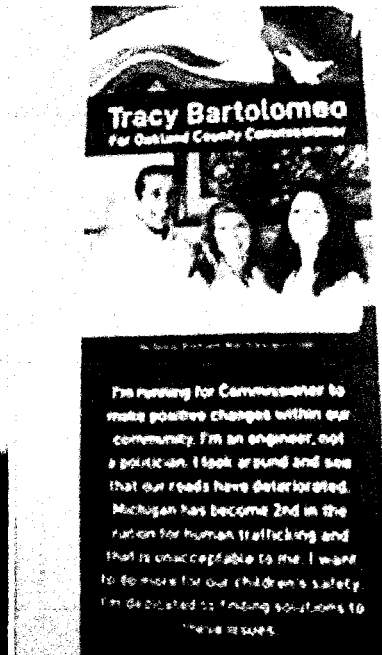
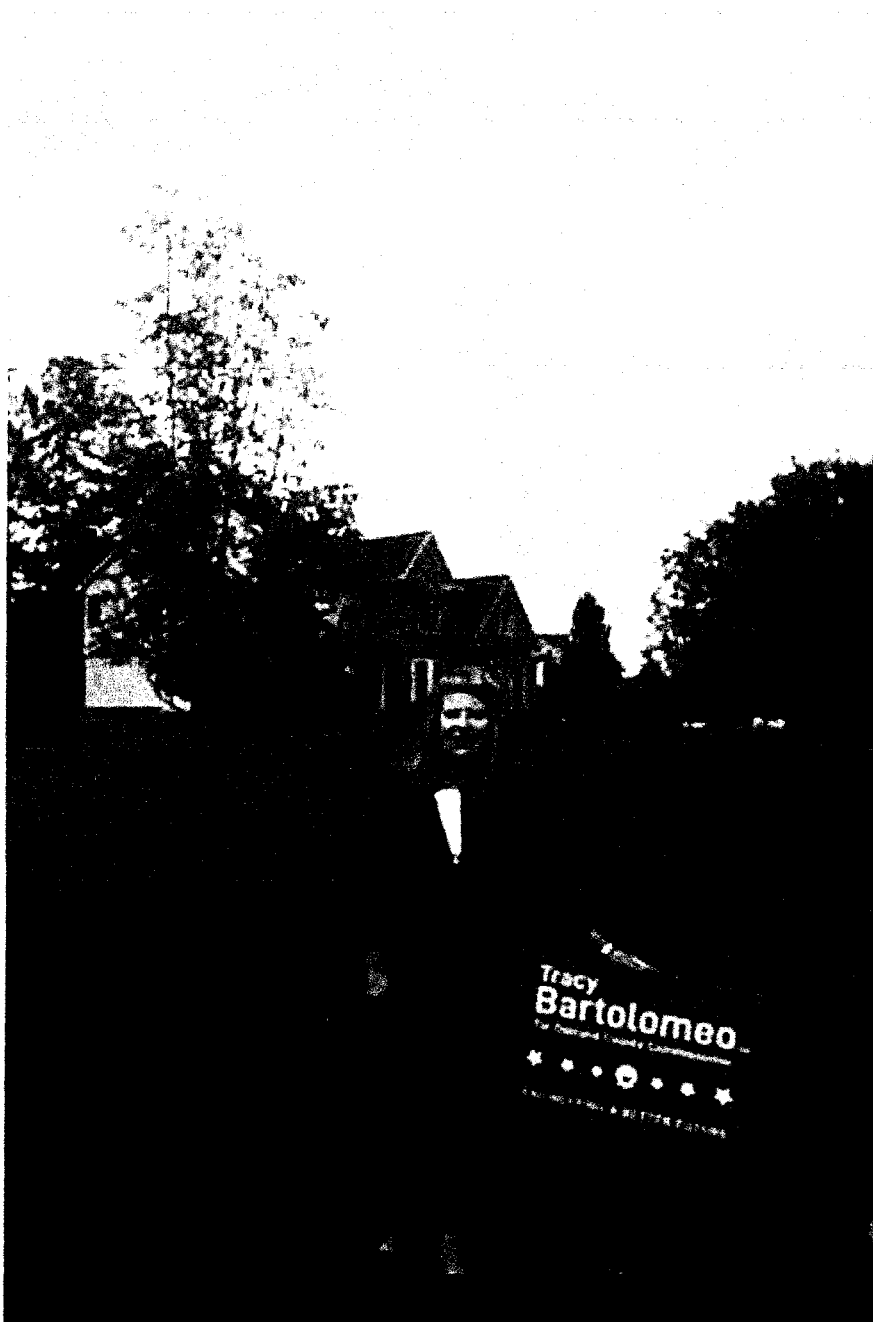




Meredith Tyack is with Tracy Bartolomeo

June 19 at 12:43 PM · 🌐

Tracy Bartolomeo is running for Oakland County Commissioner, 6th District. www.tracybartolomeo.com for more details about her goals including Prevention of Human Trafficking and Improvement of our roads. Please vote August 7, 2018!



Valerie Walker and 44 others

10 Comments · 5 Shares



Tracy Bartolomeo

For Oakland County Commissioner



My family (From left: Rob, Tracy, and Elyse)

I'm running for Commissioner to make positive changes within our community. I'm an engineer, not a politician. I look around and see that our roads have deteriorated. Michigan has become 2nd in the nation for human trafficking and that is unacceptable to me. I want to do more for our children's safety. I'm dedicated to finding solutions to these issues.

Tracy Bartolomeo

For Oakland County Commissioner



Visit: TracyBartolomeo.com Email: TracyBartolomeo@Comcast.net

As a civil engineer I understand the need and process to improve our terrible roads. As a conservative I will work to protect your Constitutional rights including our 2nd amendment. As your neighbor I'm committed to keeping Oakland County a safe place to live.

PLEASE VOTE AUGUST 7TH

*Volunteering for Homes for our Troops
From Left Tracy, Shelly & Jackie*



paid for by Tracy Bartolomeo for Commissioner

Family Owned

ZON GREEN

And G

Unusual Selection of A
Herbs, Fruit & Vegetab

RE-BLOOMING

LILAC

and

FLOWERING

SHRUBS

Wild

Orga

Soil

M

Lim

Se

**WE
NEVER
USE
CHEMICAL
PESTICIDES**

Sale Tomatoes, C
Broccoli, Br



**15%
MILITARY
DISCOUNT**

OPEN
MON-SAT
8:30-8
SUN 8:30-7

	M-S
DUCK	7
	COMM
WIKOM	SLE



paid for by Tracy Bartolomeo for Commissioner



STATE OF MICHIGAN
RUTH JOHNSON, SECRETARY OF STATE
DEPARTMENT OF STATE
LANSING

July 12, 2018

Tracy Bartolomeo
880 Artdale Drive
White Lake, Michigan 48383

Re: *Baetens v. Bartolomeo*
Campaign Finance Complaint
No. 2018-07-024-47

Dear Ms. Bartolomeo:

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 a complete and correct identification statement on certain campaign-related materials.

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

The Act also 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.*

There are four pieces of campaign materials that have been provided that are at issue: the campaign's website, yard signs, printed campaign literature, and a newspaper article.

Upon review, it appears that the paid for by statement is either omitted entirely from these campaign materials or lacks a complete paid for by statement as required by MCL 169.247. Given this, the Department 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 that refer to an election or your candidacy produced in the future must include this identification statement. For all materials currently in circulation that refer to

Tracy Bartolomeo
July 12, 2018
Page 2

your candidacy, the paid for by statement must be corrected/included where feasible. If this information has been included on your website or campaign flyers, please provide this office evidence demonstrating the proper paid for by statements.

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).

The Department considers the instant action closed and resolved.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam L.S. Fraeassi", written over a faint circular stamp.

Adam L.S. Fraeassi
Bureau of Elections
Michigan Department of State

c: David Baetens