

BEFORE THE  
MICHIGAN DEPARTMENT OF STATE  
BUREAU OF ELECTIONS

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OCT 31 PM 2:31  
ELECTIONS/GREAT SEAL

Lee J. Belding  
6685 Rives Junction Road  
Jackson, MI 49201  
(517) 962-9258

Complainant,

v.

Jeremy Curtis  
Jeremy Curtis for NW School Board  
2884 N. Oak Creek Drive  
Jackson, MI 49201

Respondents.

**COMPLAINT**

Complainant files this complaint with the Michigan Department of State under MCL 169.247 against Jeremy Curtis and the Jeremy Curtis for NW School Board committee for potential violations of Michigan Campaign Finance Act 388 of 1976, as amended (“the Act”) and Michigan Campaign Finance regulations, as described below.

Yard signs produced and distributed by Curtis do not include an identification statement, commonly referred to as an “identifier” (exhibits a & b). The Facebook page of “Jeremy Curtis for Northwest Community Schools, Board of Education” uploaded a photo of yard sign design on October 17, 2018 (exhibit c). The photo is captioned “Signs will be here soon.” A post on his personal Facebook page (exhibit d) and its ensuing comments indicate Curtis is distributing his signs throughout the district. The Act requires candidates to include information identifying the name and address of the person paying for the signs. Complainant respectfully asks the

Department to promptly investigate these potential violations and take any action necessary to ensure Curtis complies with the most basic disclosure obligations imposed upon all individuals seeking this office.

## **FACTS**

Curtis is a current resident of the Northwest Community Schools district seeking candidacy for the Board of Education (“the Board”). The school district exceeds a pupil enrollment of 2,401. Curtis’ principal campaign committee for his candidacy for the Board is Jeremy Curtis for NW School Board.

In October of 2018, Curtis began advertising his “Jeremy Curtis / School Board” yard signs on both his personal Facebook page and on the Facebook page of his campaign. Curtis solicited the distribution of the signs on the pages, and they began popping up in the community. The front side of the sign (exhibit a) includes the campaign design, and the back side (exhibit b) does not; both lack the identification statement.

## **LEGAL ARGUMENT**

Printed items, including yard signs, mailers, and fliers, are required to include an identification statement. The statement tells the person reading the material who paid for the message. The statement must also provide their address or other contact information.

According to the campaign finance guide for school board candidates promulgated by the Department’s office, “A candidate who seeks a school board position in a school district with a pupil enrollment count of 2,401 or more is subject to the filing requirements of Michigan’s Campaign Finance Act... All printed matter related to a campaign (yard signs, brochures, billboards, poll cards, stationery, etc.) must contain: “Paid for by (name and address of the committee).”

Curtis produced yard signs without an identification statement located anywhere on them. The above facts suggest Curtis has violated the Michigan Campaign Finance Act. The Department should promptly investigate this matter to ensure Respondent complies with the most basic disclosure requirements imposed on candidates.

**CERTIFICATION**

*To the best of my knowledge, information, and belief, formed after a reasonable inquiry under the circumstances, each factual contention of the complaint is supported by evidence.*

Lee J. Belding      10/29/2018  
Lee J. Belding      10/29/2018

SUBSCRIBED AND SWORN to before me this 29<sup>th</sup> day of October 2018.

[Signature]

Notary Public

My Commission Expires:

BENJAMIN JAMES BARKMAN  
NOTARY PUBLIC, STATE OF MI  
COUNTY OF INGHAM  
MY COMMISSION EXPIRES Nov 28, 2023  
ACTING IN COUNTY OF Ingham

**Exhibits**

Exhibit A:

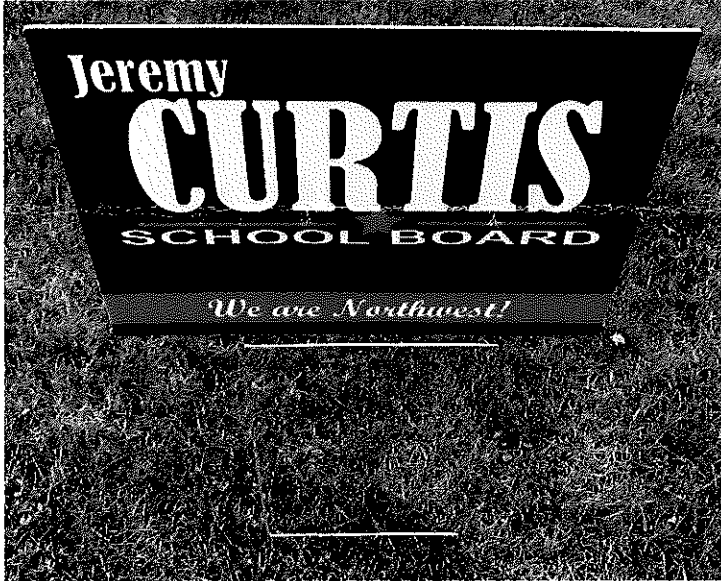


Exhibit B:

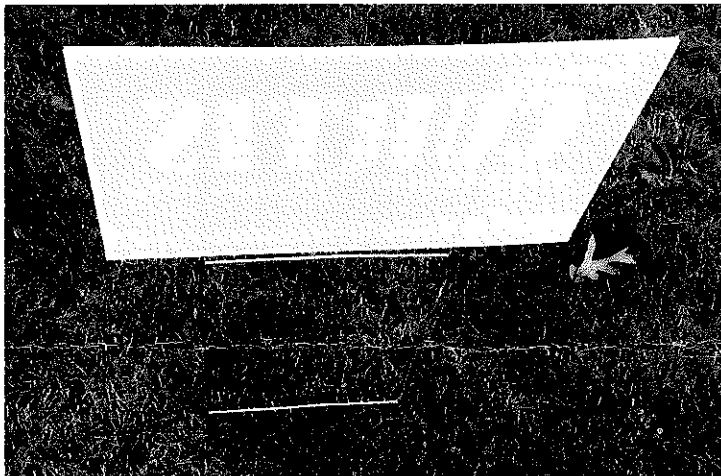




Exhibit C:

 **Jeremy Curtis for Northwest Community Schools, Board of Education** ...  
October 17 at 1:20 PM · 🌐

Signs will be here soon



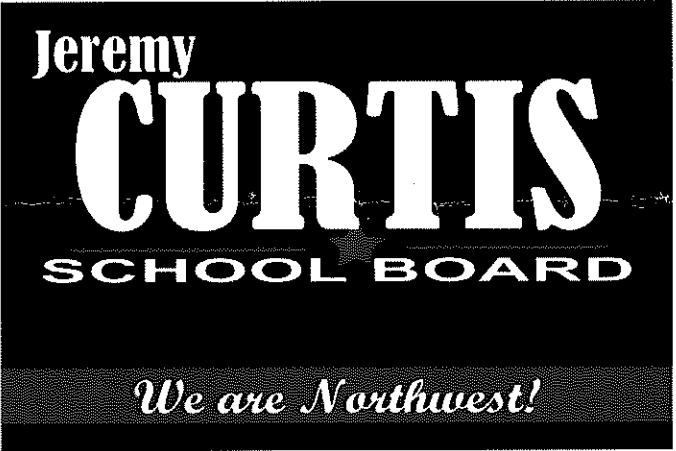
 Robert Sayles and 3 others      6 Shares 


 Like       Comment       Share

Exhibit D:

 **Jeremy Curtis** ...  
October 17 at 1:16 PM · 🌐

Signs should be here soon. Who wants one :)



 Corey Slater and 52 others      28 Comments      2 Shares

 Like       Comment       Share



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

November 8, 2018

Jeremy Curtis  
2884 N Oak Creek Drive  
Jackson, MI 49201

Re: *Belding v. Curtis*  
Campaign Finance Complaint  
No. 2018-10-98-47

Dear Mr. Curtis:

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.*

At issue in the complaint are yard signs that have been produced which read "Jeremy CURTIS Northwest School Board." A copy of the complaint and supporting evidence is enclosed with this correspondence.

Upon review, it appears that the paid for by statement is omitted entirely from these campaign materials in violation of 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.

Jeremy Curtis  
November 8, 2018  
Page 2

Note that all printed materials that refer to an election or your candidacy you produce in the future must include this identification statement. For all materials currently in circulation that refer to your candidacy, the paid for by statement must be corrected/included. If this information has been included on your materials, 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 Fracassi". The signature is written in a cursive style with a large, stylized initial "A".

Adam Fracassi  
Bureau of Elections  
Michigan Department of State

c: Lee Belding