



Michigan Department of State
Campaign Finance Complaint Form

BUREAU OF ELECTIONS • RICHARD H. AUSTIN BUILDING - 1st Floor
430 W. ALLEGAN STREET • LANSING, MICHIGAN 48918

RECEIVED/FILED
MICHIGAN DEPT OF STATE
2021 JUN -7 PM 12:29
ELECTIONS/GREAT SEAL

This complaint form may be used to file a complaint alleging that someone violated the Michigan Campaign Finance Act (MCFA). For instructions on how to complete this form, see the Campaign Finance Complaint Guidebook & Procedures document. All spaces are required unless otherwise indicated.

Section 1. Complainant			
Your Name John Caron		Daytime Telephone Number 586-777-0611	
Mailing Address 21700 Chalon			
City St Clair Shores	State MI	Zip 48080	
Email (optional)			

Section 2. Alleged Violator			
Name Angela T. Washington			
Mailing Address 22944 Pleasant			
City St Clair Shores	State MI	Zip 48080	
Email (optional)			

Section 3. Allegations (Use additional sheets if more space is needed.)

Section(s) of the MCFA alleged to be violated: 47(1) - MCL 169.247(1)

Explain how those sections were violated:

Angela Washington, daughter of Mark Fuga,
has a campaign sign that does not
have a disclaimer saying who paid
for the sign.

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

pictures of the sign included.

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

John Carson
Signature of Complainant

6-5-2021

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:

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.

Section 6. Submission

Once completed, 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

*** VOTE ***

Angela



WASHINGTON

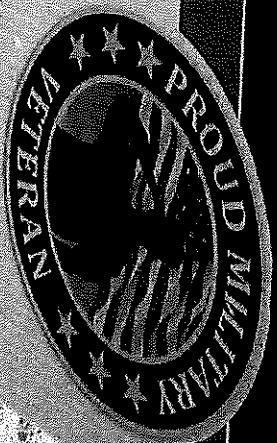
City Council

VOTE

Angela

WASHINGTON

City Council





Michigan Department of State
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430 W. ALLEGAN STREET • LANSING, MICHIGAN 48918

RECEIVED/FILED
MICHIGAN DEPT OF STATE
2021 JUN -7 PM 12:28
ELECTIONS/GREAT SEAL

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Mailing Address 21700 Chalon			
City St Clair Shores	State MI	Zip 48080	
Email (optional)			

Section 2. Alleged Violator			
Name Angela T. Washington			
Mailing Address 22944 Pleasant			
City St Clair Shores	State MI	Zip 48080	
Email (optional)			

Section 3. Allegations (Use additional sheets if more space is needed.)

Section(s) of the MCFA alleged to be violated: **47(1) - MCL 169.247(1)**

Explain how those sections were violated:

Angela Washington, daughter of Mark Fuga, has a campaign banner that does not have a disclaimer saying who paid for the banner.

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

picture of banner included.

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

John Caron
Signature of Complainant

6-5-2021
Date

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

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Signature of Complainant

Date

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

*** VOTE ***

ST. CLAIR SHORES
CITY COUNCIL

— Angela —
WASHINGTON



Smith, Jessica (MDOS)

From: John Caron <keepcarononcouncil@att.net>
Sent: Saturday, June 5, 2021 9:47 AM
To: SOS, Disclosure
Subject: Re: Campaign Finance Violations - Not Listing Disclaimers
Attachments: Angela Washington - Lacking Disclaimer - Banner.pdf; Angela Washington - Lacking Disclaimer - Campaign Signs.pdf

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

Please see the attached forms and evidence of violations of MCFA Section 47(1) - MCL 169.247(1) Angela Washington, candidate for City Council in the City of St Clair Shores.

On Thursday, May 27, 2021, 04:32:36 PM EDT, SOS, Disclosure <disclosure@michigan.gov> wrote:

Thank you for your email. The Michigan Campaign Finance Act and corresponding administrative rules require that a complaint be signed by the complainant, contain the alleged violator(s) name(s) and address(es), and contain the following certification statement, "I certify that the statements set forth above are true to the best of my knowledge and belief." Additionally, all available evidence must be submitted with a complaint.

I have enclosed a form that you may use to resubmit your complaint, if you so choose together with an explanation of the process. Use of the form is not mandatory, but use of the form does help to ensure your complaint contains all of the required information. The form is also available on our website here: https://www.michigan.gov/sos/0,4670,7-127-1633_8723_64390---,00.html

You may submit a copy of this form and evidence by mail or by email.

Should you have any questions, please do not hesitate to contact this office.

From: John Caron <keepcarononcouncil@att.net>
Sent: Wednesday, May 26, 2021 11:51 AM
To: SOS, Disclosure <Disclosure@michigan.gov>
Subject: Campaign Finance Violations - Not Listing Disclaimers

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

To whom it may concern,

2 candidates for St Clair Shores City Council placed an ad in the St Clair Shores Sentinel, a publication of C&G Newspapers. No campaign finance disclaimer appears in the ad. I have attached pictures of the ad as well as the whole page on which it appeared.

The 2 committees are:

CTE Joseph M. Fuga (ID 140088)

Mark Alan Fuga (140079) - this is the actual name as well as the candidate name.

Both file with the Macomb County County Clerk and they recommended I send this complaint to your office.

Thanks,
John Caron
St Clair Shores City Council

>
>

www.candnews.com

SMOOTH RIDES START AT THE LIBRARY

Solar-powered bicycle maintenance station installed

BY KRISTINE E. DOMSKA
kdomska@candnews.com

HARRISON TOWNSHIP — A local company and library are teaming up to help local bicyclists keep their equipment running smoothly.

The Harrison Township Public Library, 38255 L'Anse Creuse St., is now home to the first solar-powered bicycle maintenance station in the state, thanks to ESPAS Inc., of Clinton Township. The station, which features solar lighting, a solar-powered air pump, hanger arms for easy repair, various tools and a USB-charger for phones, was installed at no cost to the library May 14.

Library Director Melissa Goins said she was inspired by a trip to New Orleans to seek out a bicycle repair station for the library.

"We had stopped at a public library in New Orleans, and they had a bicycle repair station, and I just thought that was a great idea to have that available for the public," she said.

See BICYCLES on page 24A



Photo by Dirk Jacques
Phil Partner, president of ESPAS Inc., of Clinton Township, and Harrison Township Public Library Director Melissa Goins stand by the newly installed bicycle maintenance station at the library May 14.

ST. CLAIR SHORES SENTINEL, May 26, 2021 — 13A

Spring Lawn Mower BLOWOUT!

Early Bird Special LAWN MOWER TUNE UP \$59.00 Plus Parts
• Rebuild Carburetor • Sharpen Blade
• New Spark Plugs • Oil Change
WITH COUPON • EXP. 5/31/21

Gas Scooter starting at **\$1,199**

Mini Bikes starting at **\$699** AND UP

Lawn Mowers starting out at **\$189**

Commercial Worldlawn 32" Walk Behind \$1,599

586-756-8040
3970 9 Mile Rd. • Warren
Located on 9 Mile Rd. between Ryan & Dequindre



As your local agent, I will work to help:

- Ensure you have the right coverage
- Get you all the discounts you deserve on home and auto insurance
- Explain your insurance, answer your questions and put your mind at ease



Helping protect all you hold dear.
Contact me today for a free, no-obligation quote!



Carole A Bellestri
cabellestri@aaaamichigan.com

or

Fara Randazzo-Jury
fmrandozzo-jury@aaaamichigan.com
586-465-1240



Insurance underwritten by one of the following companies: Auto Club Insurance Association, Member Select Insurance Company, Auto Club Group Insurance Company, Auto Club Property Casualty Insurance Company, Auto Club South Insurance Company, Auto Club Insurance Company of Florida, or for all states except Florida, Life Insurance underwritten and services provided by our affiliate AAA Life Insurance Company. Coverage, AAA Life is licensed in all states except NY. Products and their features may not be available in all states. AAA is not an insurer. (12-101)

0516-20

Mark Fuga & Joseph Fuga Two candidates on the August ballot For City Council

Welcome you to join them for the
Memorial Day Parade Sunday, May 30th

Come and visit for a chat and a hot dog
while watching the parade at
25225 Jefferson near 10 Mile Rd.

These two candidates are a
PERFECT FIT for our **SCS City Council**

AUTOMOTIVE

REAL ESTATE

Section B Classifi



See BICYCLES on page 24A

Community Center Library Director Melissa Goins stand by the newly installed bicycle maintenance station at the library May 14.

- Ensure
- Get you
- Explain

Mark Fuga & Joseph Fuga Two candidates on the August ballot For City Council

Welcome you to join them for the
Memorial Day Parade Sunday, May 30th

Come and visit for a chat and a hot dog
while watching the parade at
25225 Jefferson near 10 Mile Rd.

These two candidates are a
PERFECT FIT for our **SCS City Council**



Insurance
Auto Club
Auto Club

- >
- >
- > Thanks, John



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

June 23, 2021

Angela Washington
22944 Pleasant Street
St. Clair Shores, Michigan 48080

Re: *Caron v. Washington*
Campaign Finance Complaint
No. 2021-06-13-47

Dear Ms. Washington:

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. A copy of the complaint is enclosed.

The complaint was submitted to the Department on June 7, 2021 and alleges that you have distributed yard signs and a banner that did not include a proper paid for by statement. Pictures of the yard signs and the banner are included with the complaint.

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).

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 it is an expenditure covered by the MCFA. The materials specifically state "Vote Angela Washington City Council," which uses words of express advocacy as defined by the Act. MCL 169.206(2)(j). Because the materials urge voters to vote for you using words of express advocacy and were published by your committee, the materials are covered by the ambit of the Act and must include the paid for by statement outlined under section 47. MCL 169.206(2)(j). However, the materials have completely omitted the required paid for by statement. Since this phrase is absent, the evidence supports the conclusion that a potential violation 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

Angela Washington
June 23, 2021
Page 2

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 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,

A handwritten signature in black ink, appearing to read "Adam Fracassi", written in a cursive style.

Adam Fracassi
Bureau of Elections
Michigan Department of State

Enclosure
c: John Caron