

**STATE OF MICHIGAN
SECRETARY OF STATE**

In re: Michigan Campaign Finance Complaint against
Walter Epps, Citizens for A Fair and Positive Government and
Messenger Printing Service.

NOW COMES, ROBERT DAVIS, a natural person, being first
duly sworn and deposed, and under the penalty of perjury, states the
following:

1. Pursuant to MCL 169.215(5),(6) of the Michigan Campaign
Finance Act (MCFA), I, Robert Davis, hereby submit this
complaint against Walter Epps, a candidate for Wayne County
Sheriff, Citizens for A Fair and Positive Government, and
Messenger Printing Service for violating MCL 169.224 and
169.247 of the MCFA.
2. My address and telephone number are as follows: Robert Davis,
180 Eason, Highland Park, MI 48203, (313) 523-7118.
3. The address for alleged violator Walter Epps is: 51367
Plymouth Ridge Dr., Plymouth, MI 48170.
4. The address for alleged violator Citizens for A Fair and Positive
Government is believed to be the same address as for candidate
Walter Epps listed above in paragraph 2.

5. The address for alleged violator Messenger Printing Service is:
20136 Ecorse Rd., Taylor, MI 48180. Telephone number is 313-381-0300.
6. Sometime in June 2022, Walter Epps and/or Citizens for a Fair and Positive Government caused to be mailed out **county-wide** a salacious and defamatory flyer defaming the character of our esteemed Wayne County Sheriff Raphael Washington, while promoting the candidacy of Walter Epps. (See Mailer **Attached**).
7. After contacting the U.S. Postal Office, I was able to determine that the mailer was mailed using the bulk mail permit of Messenger Printing Service.
8. I contacted Messenger Printing Service and spoke to a Bob Herriman, who confirmed his company mailed the mailer on behalf of Citizens for a Fair and Positive Government and that they paid for the printing and mailing of the flyer.
9. I advised Mr. Herriman that Citizens for a Fair and Positive Government was NOT a registered political action committee with the Wayne County Clerk or the Secretary of State and

thus, could not have been the entity that paid for the mailer because they do not legally exist.

10. Mr. Herriman then advised me that he could not provide me with the name of the individual who paid for the printing and mailing of the flyer due to privacy restrictions.
11. I personally reviewed the public campaign finance databases of both the Wayne County Clerk and Secretary of State and neither database contained any information showing that Citizens for A Fair and Positive Government was a properly registered political action committee under the MCFA.
12. Mr. Herriman would not provide me with the name of the individual who paid Messenger Printing Service to mail the defamatory mailer.
13. The mailer mailed by Messenger Printing Service did **not contain the address of Citizens for a Fair and Positive Government nor the address of Walter Epps**, whom the mailer promoted. **(See Mailer attached)**.
14. Failing to provide the address of the committee or person(s) who paid for the mailer violates MCL 169.247 of the MCFA.

15. Additionally, because Citizens for a Fair and Positive Government is not properly registered as a political action committee with the Wayne County Clerk or the Secretary of State, failure to properly file a statement of organization violates MCL 169.224 of the MCFA.
16. Pursuant to MCL 169.224 of the MCFA, Citizens for a Fair and Positive Government was required to file a statement of organization registering as a political action committee once the committee expended and/or received funds advocating and/or promoting a candidate for election to a particular office.
17. Upon information and belief, I believe candidate Walter Epps and/or his candidate committee paid for the mailer.
18. Based upon information I personally reviewed from the Wayne County Clerk's office and Secretary of State's office, Citizens for a Fair and Positive Government is a "nonexistent" and possibly "fraudulent" organization.
19. If called and sworn as a witness, I am competent to testify as to the facts stated herein.

20. 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.

FURTHER AFFIANT SAYETH NOT.



ROBERT DAVIS
180 Eason
Highland Park, MI 48203
(313) 523-7118
Davisrobert854@gmail.com

Subscribed and sworn to before me

On this 5th day of July, 2022



Notary Public Signature

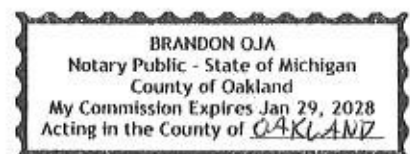
BRANDON OJA

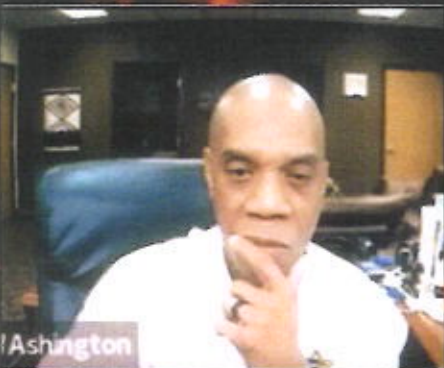
Printed Name of Notary Public

State of Michigan, County of OAKLAND

My Commission Expires 01/29/2028

Acting in the County of OAKLAND





This is the current interim Sheriff of Wayne County, Raphael Washington. He was selected and not elected. Please research the facts of his appointment. He is a habitual sexual harasser. See the facts below.

WAYNE

Wayne County settled with women who sued 2 candidates to replace Sheriff Benny Napoleon

WXYZ

Misconduct claims against Wayne County Sheriff candidates receive new scrutiny

WXYZ

Wayne County Sheriff Raphael Washington ducks questions over harassment claims

Deadline Detroit

Sexual Harassment Allegations Surface in Wayne County ...

These are separate and real incidents backed by real police reports and investigations:

- Peeping Tom investigation in the City of Southfield
- Sexual Assault investigation by DPD Internal Affairs that was referred to the Wayne County Prosecutor's office
- Sexual harassment investigation at Wayne County Sheriff's Department by Internal Affairs
- DEMOTED FROM CHIEF TO DEPUTY CHIEF FOR SEXUAL HARASSMENT
- Sexual Harassment case at Sheriff's Office that resulted in \$85,000 lawsuit and paid by Wayne County Taxpayers.

This behavior does not stop until we vote him out!!!!

In 2017, Raphael "Ray" Washington was accused by a Wayne County deputy of making unwanted sexual advances and requests.



0034603 000001 000047
*****SCH 5-DIGIT 48212

PRESORT STANDARD
U.S. POSTAGE
PAID
PERMIT #1927
DETROIT, MI

OUR FRIENDS AT

~~REDACTED ADDRESS~~
HIGHLAND PARK MI 48203-3356



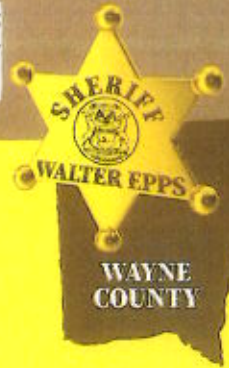
Vote no to Sexual Harassment!! FIRE Raphael Washington!!

Front of Mailer

Your Candidate for Wayne County Sheriff



Walter Epps for Wayne County Sheriff



www.waltereppsforsheriff.com

- Bachelors and MBA in Accounting
- FBI National Academy
- Certified Project Management Professional
- US Navy War College (Current)
- Employed with City of Detroit Finance Department
- Wayne County Sheriff's Dept. (Retired)
- Currently Serving in the U.S. Navy Reserve as a Naval Officer
- Navy Honor Guard

Completed more than 1280 volunteer funeral honors for U.S. military veterans



Paid for by Citizens for a Fair and Positive Government

Back of Marker



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

September 9, 2022

Walter Epps
Citizens for A Fair and Positive Government
51367 Plymouth Ridge Drive
Plymouth, MI 48170

Re: *Davis v. Epps*
Campaign Finance Complaint No. 2022-8-79-47

Dear Mr. Epps and Citizens for a Fair and Positive Government:

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 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). Materials produced by anyone other than a candidate or the candidate committee are required to include the phrase "with regulated funds" after the paid for by statement. MCL 169.247(4). 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. The mailer uses words of express advocacy by urging voters to "fire Raphael Washington." Although the mailer contains a paid for by statement, the committee's address, and required disclaimers are entirely omitted. 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 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 and the phrase “with regulated funds.”

Note that all printed materials 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 at 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 Section
Bureau of Elections
Michigan Department of State

Enclosure
c: Robert Davis