



**Michigan Department of State**  
**Campaign Finance Complaint Form**

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

FILED  
JUL 30 2020  
MICHIGAN DEPT OF STATE

2020 JUL 30 PM 3:24

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 <b>Kara Douma</b>		Daytime Telephone Number <b>517 896 5077</b>	
Mailing Address <b>5407 Lampen Dr</b>			
City <b>E. Lansing</b>	State <b>M</b>	Zip <b>48823</b>	
Email (optional) <b>Karadouma@comcast.net</b>			

Section 2. Alleged Violator		
Name <b>Dan Devine - Dan Devine for Supervisor</b>		
Mailing Address <b>4511 Lakeview Court</b>		
City <b>Bloomfield Twsp</b>	State <b>Mi</b>	Zip <b>48301</b>
Email (optional) <b>248-221-8763</b>		

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

Section(s) of the MCFA alleged to be violated: **169.244**

Explain how those sections were violated:

**Candidate Dan Devine sent out a**  
**mailing endorsing another candidate**  
**for office - expenditure on behalf**  
**on another candidate committee**

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

**see attached mailer**



**Michigan Department of State**  
**Campaign Finance Complaint Form**

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**see attached mailer**



#### 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

Kara L. Quenna  
Signature of Complainant

7/30/2020  
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:*

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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



# Leo Savoie – Brian Kepes TEAM IS DISASTROUS!

## Since Savoie-Kepes took over in 2016:

- They Lost \$31 Million Dollars in the Pension Fund in just 4 years <sup>4</sup>
- Dow-Jones Average <sup>5</sup> ... **GAINED 20%**  
Bloomfield Township Pension Fund <sup>4</sup> ... **LOST 25%**
- **KEPES INVESTMENTS** did ... **45% worse than Dow-Jones**
- Bloomfield Township Pension Fund went from 107% **FUNDED** (Under Devine) to just ... **82% FUNDED in 4 years** under Kepes and Savoie <sup>4</sup>
- Investments in the Bloomfield Township Pension Fund were \$224 Million in 2017 and now are \$193 Million in 2020 for a net loss of \$31 Million Dollars since Kepes became Treasurer. <sup>4</sup>

## Under Dan Devine:

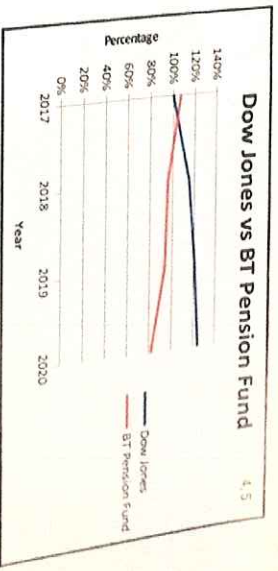
- Bloomfield **EARNED** its AAA Bond Rating. <sup>3</sup>
- Investments **INCREASED** by 80% in 5 Years. <sup>3</sup>
- Dan **HIRED** the best financial advisors and we got what we paid for... they made money for US! <sup>3</sup>
- Pension fund **107% FUNDED** when Dan left office. <sup>4</sup>
- Dan called for audits of Water & Sewer Funds. <sup>3</sup>
- Dan **PREDICTED** Leo's **ILLEGAL** Water & Sewer billing would cost the Township \$12 million, and it did. <sup>3</sup>
- Dan **NEVER** proposed a 1% fee on property taxes. <sup>3</sup> (another lie/Kepes Lie)



**We have to do better, which is why ...**  
**Dan Devine ENDORSES Mark Antakli for Treasurer.**

## Vote for Dan Devine for Supervisor and Mark Antakli for Treasurer

Footnotes: 1. Bloomfield Twp. Union Contract 3-23-20. 2. Downtown News/Magazine 3-22-19. 3. Bloomfield Twp. Minutes 2011-2020. 4. Bloomfield Twp. Website. 5. Dow Jones Website.



Brian Elliot Kepes  
Or Current Resident  
4615 Pickering Rd  
Bloomfield Hills MI 48301-3631



# THE FACTS ON LEO SAVOIE AND BRIAN KEPESE!

- For more info: [www.CutBloomfieldSpending.com](http://www.CutBloomfieldSpending.com) and [www.BetterBloomfieldTownship.com](http://www.BetterBloomfieldTownship.com)

(Paid for by Dan Devine for Supervisor - 4511 Lakewood Ct., Bloomfield Hills, MI 48301 - 248-221-8765 - [www.DevineBloomfield.com](http://www.DevineBloomfield.com))





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

August 13, 2020

Dan Devine  
4511 Lakeview Court  
Bloomfield Twp., MI 48301

Re: *Douma v. Devine*  
Campaign Finance Complaint  
No. 2020-07-133-44

Dear Mr. Devine:

The Department of State (Department) has received a formal complaint alleging violations of the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.201 *et seq.* A copy of the complaint and supporting documentation is enclosed with this letter.

The complaint was submitted to the Department by Kara Douma on July 30, 2020 and alleges that you have improperly made a contribution to a ballot question committee using your committee funds. Specifically, Ms. Douma alleges that you sent a mailer endorsing another candidate for office. Submitted with her complaint, is a copy of the flyer that was mailed.

The MCFA prohibits candidate committees from making an expenditure or other disbursement except to further the nomination or election of the candidate for which the committee was formed. MCL 169.244(2). A person who knowingly violates this section is guilty of a misdemeanor punishable by imprisonment up to 90 days or a fine up to \$1,000, or both. MCL 169.244(5).

The purpose of this letter is to inform you of the Department's examination of these matters and your right to respond to the allegations before the Department proceeds further. It is important to understand that the Department is neither making this complaint nor accepting the allegations as true. The investigation and resolution of this complaint is governed by section 15 of the Act and the corresponding administrative rules, R 169.51 *et seq.* An explanation of the investigation process is enclosed with this letter and a copy is available on the Department's website.

**If you wish to file a written response to this complaint, you are required to do so within 15 business days of the date of this letter.** Your response may include any written statement or additional documentary evidence you wish to submit. All materials must be sent to the Department of State, Bureau of Elections, Richard H. Austin Building, 1<sup>st</sup> Floor, 430 West

Dan Davine  
August 13, 2020  
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Allegan Street, Lansing, Michigan 48918. If you fail to submit a response, the Department will render a decision based on the evidence furnished by the complainant.

A copy of your answer will be provided to Ms. Douma, who will have an opportunity to submit a rebuttal statement to the Department. After reviewing all of the statements and materials provided by the parties, the Department will determine whether "there may be reason to believe that a violation of [the MCFA] has occurred [.]" MCL 169.215(10). Note that the Department's enforcement powers include the possibility of entering a conciliation agreement, conducting an administrative hearing, or referring this matter to the Attorney General for enforcement of the criminal penalty provided in section 44(5) of the Act.

If you have any questions concerning this matter, you may contact me at (517) 335-3234.

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: Kara Douma

To:

State of Michigan

Jocelyn Benson, Secretary of State

Department of State,

Bureau of Elections,

Richard H. Austin Building, 1<sup>st</sup> Floor,

430 West Allegan Street,

Lansing, Michigan 48918

Attention: Adam Fracassi

From:

Dan Devine

4511 Lakeview Court

Bloomfield Township, MI 48301

Dated: August 26, 2020

Re:

Douma v. Devine

Response to Campaign Finance Complaint

No. 2020-07-133-44

Dear Mr. Fracassi:

Please accept the following as my Response to Campaign Finance Complaint No. 2020-07-133-44;

The campaign committee of Dan Devine for Supervisor inadvertently sent a campaign mailing referencing the endorsement of a candidate for Treasurer without a disclosure referencing that candidate's campaign committee as a "paid for by" participant in the mailing in addition to the Dan Devine for Supervisor committee.

2020 SEP 2 AM 8:19

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The failure to add such an additional disclosure was an unintended mistake made by the campaign committee of Dan Devine for Supervisor. My intent was to properly follow the MCFA 169.244 and any failure to do so was unintentional. I was unaware of any possible mistake until I received the above-referenced Campaign Finance Complaint in the mail.

Therefore, I do not admit a violation of MCFA 169.244 in that any such mistake was not intentional on my part and I did not knowingly violate MCFA 169.244.

In the spirit of reconciliation, I would be willing to consider an informal resolution of this matter without admission of guilt through the vehicle of a conciliation agreement.

Please contact me with direction as to how to proceed in resolving this matter accordingly.

Thank you,

A handwritten signature in black ink, appearing to read 'Dan Devine', with a long horizontal flourish extending to the right.

Dan Devine

4511 Lakeview Ct.

Bloomfield Township, MI 48301



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

October 8, 2020

Kara Douma  
5407 Lampen Drive  
East Lansing, MI 48823

Dear Ms. Douma:

The Department of State received a response to the complaint you filed against Dan Devine, which concerns an alleged violation of the Michigan Campaign Finance Act (MCFA), 1976 P.A. 388, MCL 169.201 *et seq.* A copy of the response is provided as an enclosure with this letter.

If you elect to file a rebuttal statement, you are required to send it within 10 business days of the date of this letter to the Bureau of Elections, Richard H. Austin Building, 1<sup>st</sup> Floor, 430 West Allegan Street, Lansing, Michigan 48918.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam Fracassi".

Adam Fracassi  
Bureau of Elections  
Michigan Department of State

c: Dan Devine





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

July 15, 2022

Dan Devine  
4511 Lakeview Court  
Bloomfield Twsp, MI 48301

Re: *Douma v. Devine*  
Campaign Finance Complaint No. 2020-7-133-44

Dear Mr. Devine:

The Department of State (Department) has finished investigating the campaign finance complaint filed against you by Kara Douma alleging that you violated the Michigan Campaign Finance Act (MCFA or Act). This letter concerns the disposition of that complaint.

The complaint alleged that you improperly made a contribution to another candidate committee using your committee funds. Specifically, Ms. Douma alleged that you sent out a mailing endorsing another candidate for office, which was a prohibited expenditure on behalf of another candidate committee.

In your September 2, 2020 response to the complaint, you acknowledged that you sent out a campaign mailing referencing the endorsement of a candidate for township treasurer without a disclosure referencing that candidate's campaign committee as a "paid for by" participant in the mailing. You stated that the failure to include the disclosure was inadvertent and unintentional, and expressed a willingness to consider entering into a conciliation agreement with the Department.

Ms. Douma did not provide a rebuttal to your response.

As outlined in the Department's previous correspondence, the MCFA prohibits candidate committees from making an expenditure or other disbursement except to further the nomination or election of the candidate for which the committee was formed. MCL 169.244(2). A person who knowingly violates this section is guilty of a misdemeanor punishable by imprisonment up to 90 days or a fine up to \$1,000, or both. MCL 169.244(5).

The Department has reviewed the evidence submitted in the matter and finds that the evidence submitted supports the conclusion that there may be reason to believe that your actions constitute

Dan Devine

Page 2

a potential violation of the MCFA. However, the Department concludes that a formal warning is an appropriate resolution to the complaint.

Please be advised that this notice has served to remind you of your obligation under the Act to restrict expenditures and disbursements to the furtherance of the nomination or election for the candidate for which the committee was formed. This notice 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 169.244(5), 215(10).

If you have any questions concerning this matter, you may contact  
[BOERegulatory@michigan.gov](mailto:BOERegulatory@michigan.gov).

Sincerely,

Regulatory Division  
Bureau of Elections  
Michigan Department of State

c. Kara Douma