

**Smith, Jessica (MDOS)**

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**From:** Jennifer Eden <jeneden124@gmail.com>  
**Sent:** Friday, June 26, 2020 2:44 PM  
**To:** SOS, Disclosure  
**Subject:** Campaign Finance Complaint Form  
**Attachments:** Campaign Finance Complaint Form.pdf

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Please find my Campaign Finance Complaint Form along with supporting pictures attached. Contact me if you have any questions.

Thank you  
Jennifer Eden  
810-280-0114



**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

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              | Jennifer Eden        | Daytime Telephone Number<br>810-280-0114 |
| Mailing Address        | 10048 Carmer Road    |  |
| City                   | Fenton               | State MI Zip 48430                       |
| Email (optional)       | Jeneden124@gmail.com |  |

| Section 2. Alleged Violator |                                      |                    |
|-----------------------------|--------------------------------------|--------------------|
| Name                        | Joseph J. Trollman                   |                    |
| Mailing Address             | 10005 Hartland Road                  |                    |
| City                        | Fenton                               | State MI Zip 48430 |
| Email (optional)            | joseph1lovesnow@aol.com 810-423-2493 |                    |

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

Section(s) of the MCFA alleged to be violated: Sections 169.247 and 169.241

Explain how those sections were violated:

Section 169.247 Road Signs clearly do not disclose or identify name and address of person paying for the signs.

Section 169.241 A person shall not accept or expend an anonymous contribution.

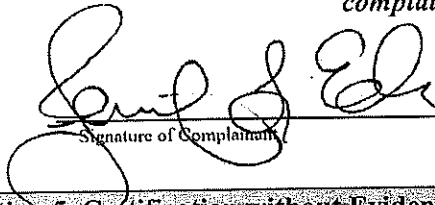
Evidence included with the submission of the complaint that supports the allegations:

Picture of road sign. Picture of donation jar and location within his business.

**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

6-25-2020

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:*

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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**

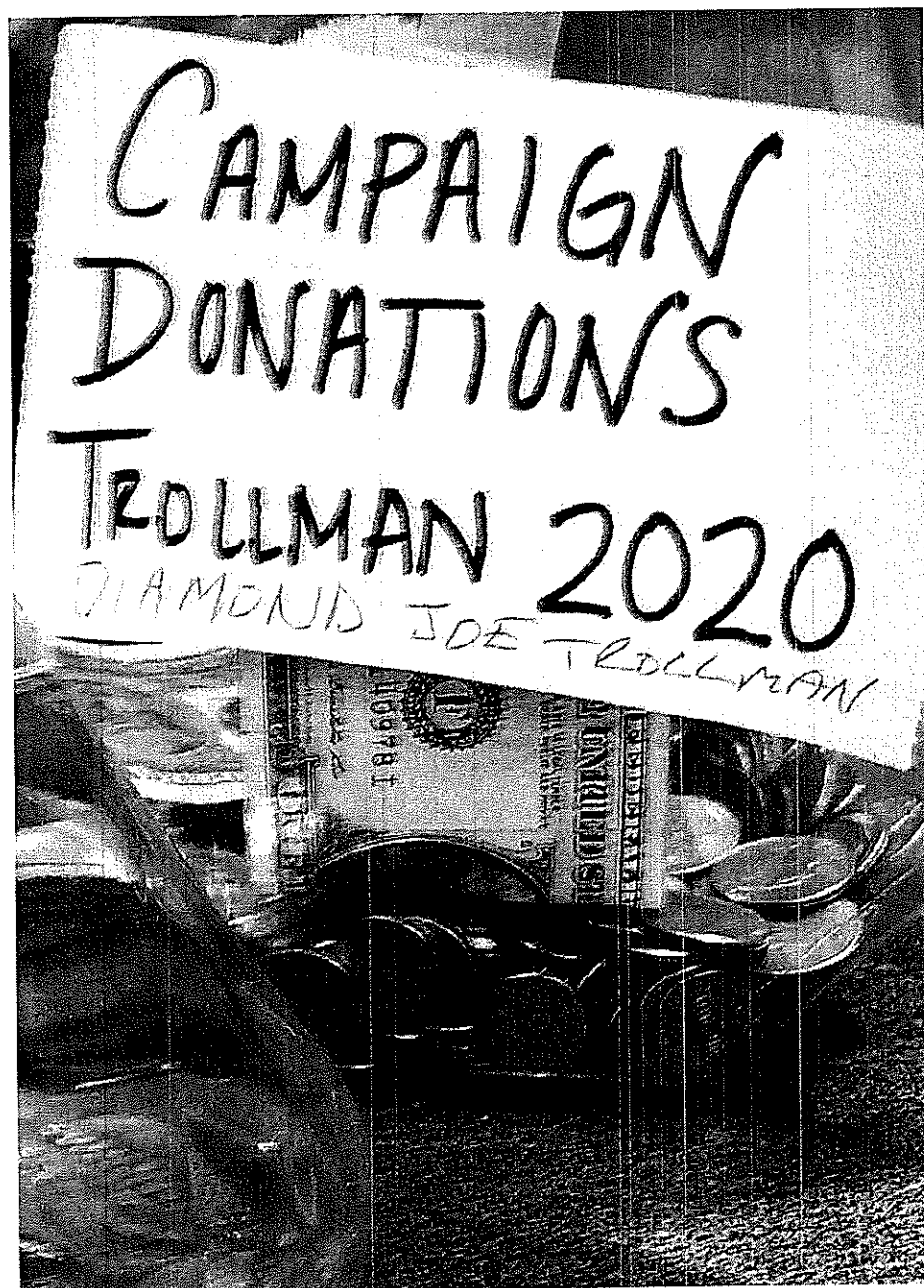
Once completed, mail or hand deliver the complaint form with your evidence to the address below. The complaint is considered filed upon receipt by the Bureau of Elections.

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





Picture taken at Runyan Lake Party Store  
10005 Hartland Road  
Fenton, MI 48430





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

July 24, 2020

Joseph Trollman  
1005 Hartland Road  
Fenton, MI 48430

Re: *Eden v. Trollman*  
Campaign Finance Complaint  
No. 2020-06-50-47

Dear Mr. Trollman:

The Department of State (Department) received a formal complaint filed by Joseph Trollman against you 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 filed with the Department and alleges that you have published campaign materials that fail to contain a proper disclosure and that you have accepted anonymous contributions.

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).

Additionally, the Act prohibits a person from accepting anonymous contributions. MCL 169.241. A Violation of this section is a misdemeanor punishable by a fine up to \$1,000 (or \$10,000 if the person is not an individual), imprisonment for up to 90 days, or both. MCL 169.241(4).

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

Joseph Trollman  
July 24, 2020  
Page 2

additional documentary evidence you wish to submit. Due to the ongoing public health emergency, the Department asks that all materials be submitted via email to [Elections@Michigan.gov](mailto:Elections@Michigan.gov) to my attention. 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. Eden, 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 41(4) of the Act.

If you have any questions concerning this matter, you may contact me via email.

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

c: Jennifer Eden, via email

**Fracassi, Adam (MDOS)**

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**From:** Fracassi, Adam (MDOS)  
**Sent:** Friday, July 24, 2020 12:48 PM  
**To:** 'jeneden124@gmail.com'  
**Subject:** Eden v. Trollman - Campaign Finance Complaint  
**Attachments:** Notice of Complaint.pdf

Ms. Eden,

Please see attached correspondence regarding the complaint filed.

**Adam Fracassi**, Election Law Specialist  
Michigan Bureau of Elections  
P.O. Box 20126  
Lansing, Michigan 48901

**Fracassi, Adam (MDOS)**

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**From:** SOS, Elections  
**Sent:** Monday, August 10, 2020 7:26 PM  
**To:** Fracassi, Adam (MDOS)  
**Subject:** FW: Eden v. Trollman  
**Attachments:** side jar.jpg; other side jar.jpg; money bag.jpg; money bag2.jpg

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**From:** Joseph Trollman <josephilovesnow@aol.com>  
**Sent:** Monday, August 10, 2020 7:17 PM  
**To:** SOS, Elections <Elections@michigan.gov>  
**Subject:** Eden v. Trollman

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Bureau of Elections  
Richard H. Austin Building  
1st Floor  
430 W. Allegan  
Lansing, MI 48918

Re: *Eden v. Trollman*  
Campaign Finance Complaint  
No. 2020-06-50-47

Dear The State of Michigan:

I, Joseph J. Trollman, Am writing a response to the complaint filed by Mrs. Jennifer Eden for allegedly violation Section 169.27 and Section 169.241. The alleged donation jar located within the business is a donation jar but not one for the Campaign Fund for Trollman for Treasurer during the August 4th Elections for Tyrone Township Treasurer. The donation jar has been located inside the business for years and has only been used for the purpose of donating to the local church that provides food and other supplies for local families. Runyan Lake Food Center has been a reoccurring contributor to the local church and plans to continue to donate when possible. This donation jar was previously reported stolen and an official police report was made by The Livingston County Sherriff's Department during the Election Campaign for Tyrone Township Treasurer. After the donation jar was stolen from within Runyan Lake Food Center, a new jar was put in place to replace the stolen jar. Afterwards, A local Customer put a sign on the jar stating, "Campaign Donations Trollman 2020 Diamond Joe Trollman" as a joke on the jar in question for possible violations of the Campaign Finance Act. This joke was never suppose to be taken seriously as the jar is marked on both sides stating its true intended purposes. The donations that have been collected from the jar still remain in the possession of Joseph J. Trollman and had every intent to continue to be donated to the local church. Attached to this email is a copy of the images of the donation jar currently standing at Runyan Lake Food Center as well as an image of the actual donation money still in possession. All Campaign signs were purchased solely with Joseph J. Trollman's personal funds and a copy of the invoice can be provided if desired.

If there is additional information needed or you need to contact me, you may do so at

Joseph J. Trollman  
[josephilovesnow@aol.com](mailto:josephilovesnow@aol.com)  
(810) 423 - 2493

Donations  
are for  
Church for  
local families  
not Diarrhoea  
with Her







## **Fracassi, Adam (MDOS)**

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Joseph J. Trollman  
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(810) 423 - 2493



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

July 15, 2022

Joseph Trollman  
1005 Hartland Road  
Fenton, MI 48430

Re: *Eden v. Trollman*  
Campaign Finance Complaint No. 2020-06-50-47

Dear Mr. Trollman:

The Department of State (Department) has finished investigating the campaign finance complaint filed against you by Jennifer Eden on June 25, 2020. The complaint alleges you violated MCL 169.247 of the Michigan Campaign Finance Act (MCFA or Act) by failing to include an identification statement on road signs for the Joseph J. Trollman for Tyrone Township Treasurer campaign. Additionally, the complaint alleged that you were accepting anonymous cash donations made to a jar located inside your place of business. Photographs of the road sign in question, as well as the donation jar, were included with the complaint.

You responded to the complaint on August 10, 2020. In your response you indicated that the campaign signs were purchased solely with your personal funds.<sup>1</sup> Additionally, you indicated that, while the photos submitted with the complaint showed a jar for cash donations labeled as "Campaign Donations Trollman 2020," the sign was a joke and donations placed in the jar are made to a local church.

Donation Jar

Committees regulated by the MCFA are forbidden from accepting any anonymous donations. MCL 169.241(2). Additionally, committees are forbidden from accepting cash donations of more than \$20.00 from any individual. MCL 169.241(1). A knowing violation of either of these prohibitions is a "misdemeanor punishable, if the person is an individual, by a fine of not more than \$1,000.00 or imprisonment for not more than 90 days, or both, or, if the person is other than an individual, by a fine of not more than \$10,000.00." MCL 169.241(4).

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<sup>1</sup> The Department notes that all expenditures made by a candidate in furtherance of their campaign for office must be reported, even if the expenditures are made from "personal" funds. Because the complaint did not allege a violation of the reporting sections of the MCFA, however, the Department does not examine here whether you properly complied with your obligations to report your purchase of these signs.

The Department concludes that you have submitted sufficient evidence to rebut the possibility that the donation jar in your business may constitute a violation of the MCFA. Specifically, the Department finds your detailed explanation explaining that the donations made to the jar were transferred to a local church, and not to your campaign, credible. Additionally, no evidence was submitted showing that the funds might either have been reported as contributions to your campaign or used for campaign-related expenses. As such, the Department dismisses the Section 41 allegations contained in the complaint.

#### Road Sign and “Paid For By” Statement

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 the materials fall within the ambit of the MCFA. Because the materials explicitly advocate for the election or defeat of a candidate, or for the passage or defeat of a ballot proposal, the materials contain express advocacy as defined by the Act. MCL 169.206(2)(j). As explained above, such materials must contain a “paid for by” statement listing the name and address of the committee purchasing the materials. However, the evidence shows that the materials at issue here omit part or all of that required statement. That absence supports the conclusion that there may be reason to believe a violation of the MCFA has occurred.

When the Department finds that there may be reason to believe a violation has occurred, the Act requires the Department to use “informal methods such as a conference [or] conciliation” to correct the potential violation or to prevent further violation. MCL 169.215(10).

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. The identification statement must contain 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.

Please be advised that this notice has served as a warning to you of your obligation under the Act to include an identification statement on all campaign materials. This warning may be used in future proceedings as evidence 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).

Joseph Trollman  
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Sincerely,

Regulatory Division  
Bureau of Elections  
Michigan Department of State

c: Jennifer Eden, via email