



Michigan Department of State
Campaign Finance Complaint Form
BUREAU OF ELECTIONS - RICHARD H. AUSTIN BUILDING - 1st Floor
400 W. ALBION STREET - LANSING, MICHIGAN 48208

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 <u>Mark Forbert</u>		Telephone Number <u>586 212-396</u>	
Mailing Address <u>5016 Montague</u>			
City <u>Cheslerford</u>	State <u>MI</u>	Zip <u>48047</u>	
Email (optional) <u>trehroft@me.com</u>			

Section 2. Alleged Violator			
Name <u>PIDANSON NIKULA FOR STATE REP</u>			
Mailing Address <u>152105 WINDMILL DRIVE</u>			
City <u>LINCOLN</u>	State <u>MI</u>	Zip <u>48044</u>	
Email (optional)			

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

Section(s) of the MCFA alleged to be violated: 24 and 33

Explain how these sections were violated:

The candidate filed a waiver that he
wouldn't raise or spend more than \$1000
According to his Facebook site reporting
his candidacy he has spent \$4500+ to
date 9/24/2010

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

Copy of facebook site reporting report

from Facebook ad library. He broke the
\$1000 threshold prior to the primary therefore,
he is required to file at least a post-primary
report.

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

Mark F. Felt
Signature of Complainant

9-30-20
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. These specific contentions are:

X

Signature of Complainant

Date

Section 15(8) of the MCEA provides that a person who files a complaint with a false certification is responsible for a civil violation of the MCEA. 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

Issues, EL... Brandon Mikula for State Representative

X Q



Brandon Mikula for State Representative

@Mikula2020

724 likes • Politician

Page transparency

See More

Page created Apr 20, 2020

Page name has not changed

Primary country/region location for people who manage this Page includes: United States (2)

Total spent by Page on ads about social issues, elections or politics
May 7, 2018 - Sep 28, 2020
United States

\$4,501

See spend details

Recently spent by Page on ads about social issues, elections or politics
7 days • Sep 22 - Sep 28, 2020
United States

\$0

Ads from Brandon Mikula for State Representative

~74 results

These results include active and inactive ads about social issues, elections and politics.

All Ads

Issues, Elections or Politics

Filter By:

United States

Delivery by Region

Active and Inactive

Disclaimer

Sort by

Platform

Potential Reach

Impressions by Date

Keyword

Q

Search all ▾ | Brandon Mikula for State Representative

X Q



Brandon Mikula for State Representative

@Mikula2020

659 likes • Politician

Page transparency

See More

📅 Page created Apr 20, 2020

🔗 Page name has not changed

📍 Primary country/region location for people who manage this Page includes: United States (2)

Total spent by Page on ads about social issues, elections or politics

May 2018 - Jul 31, 2020
United States

\$2,459

See spend details

Recently spent by Page on ads about social issues, elections or politics

7 days • Jul 25 - Jul 31, 2020
United States

\$673

See spend details

~66 results

All Ads

Issues, Elections or Politics

Disclaimers used by this Page



Disclaimer

Brandon Joseph Mikula

Amount spent
United States

\$2,459

Total spent by Page

\$2,459

● Active

Started running on Jul 31, 2020

ID: 289423468989258

● Active

Started running on Jul 29, 2020

ID: 655444745066941



About social issues, elections or politics



Brandon Mikula for State Representative

Sponsored • Paid for by Brandon Joseph Mikula

Soon, on August 4th, Michiganders in the 32nd District have a decision to make. Do you cast your vote for a candidate that has served his country in the U.S. Navy? A candidate that is a local firefighter? A candidate that has devoted his life to public service and seeks to extend that service by representing your interests in Lansing? ...



WWW.MIKULAFORHOUSE.COM

A History of Service

Learn ...

💰 Amount spent (USD): \$100 - \$199

👤 Potential Reach: 100K - 500K people



About social issues, elections or politics

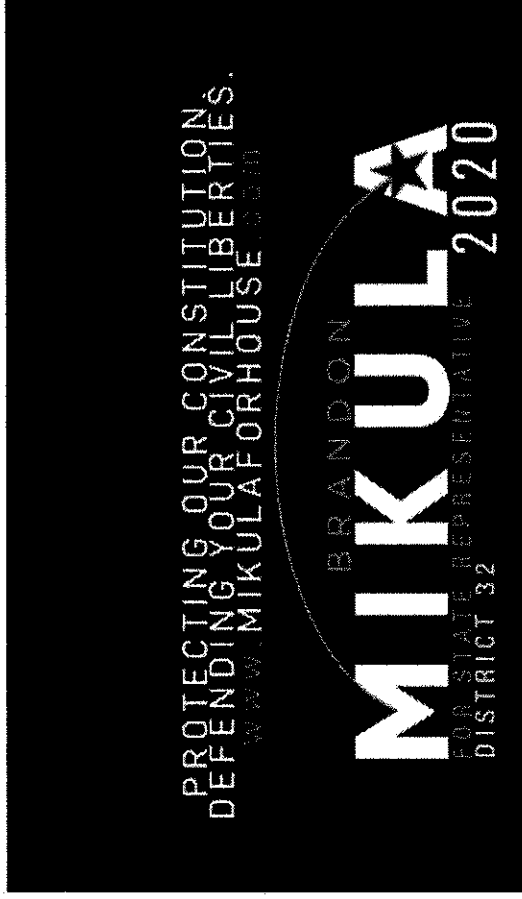


Brandon Mikula for State Representative

Sponsored • Paid for by Brandon Joseph Mikula

"Any time we deny any citizen the full exercise of his constitutional rights, we are weakening our own claim to them."

This quote from President Eisenhower has always resonated with me. We must never allow any politician, or political party, to deny us of our constitutional rights - or...



Brandon Mikula for State Representative

Learn ...

💰 Amount spent (USD): <\$100

👤 Potential Reach: 100K - 500K people

● Active
Started running on Jul 29, 2020
ID: 815842872285463

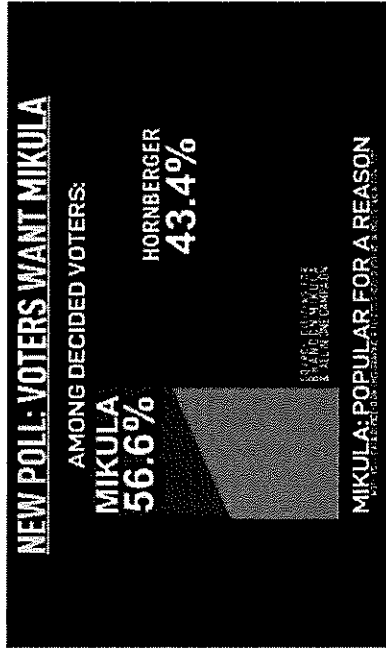


📢 About social issues, elections or politics

Brandon Mikula for State Representative
Sponsored • Paid for by Brandon Joseph Mikula

A recent poll commissioned by my campaign and conducted by an independent polling company, All In One Campaign, has shown that #TeamMikula now holds a 13-point lead over the incumbent, Mrs. Hornberger.

Michiganers in the 32nd District are making their voice heard loudly - when I first announced in April, we were down double...



Amount spent (USD): <\$100
Potential Reach: 100K - 500K people

See Ad Details

● Active
Started running on Jul 27, 2020
ID: 328050928234283



📢 About social issues, elections or politics

Brandon Mikula for State Representative
Sponsored • Paid for by Brandon Joseph Mikula

I am proud to receive an 'A' rating from the National Rifle Association (NRA) - which is the highest grade a candidate can receive. My commitment to protecting the Second Amendment rights of Michiganders in the 32nd District, and across the state, is unwavering - as is my commitment to making Michigan a constitutional carry state.



Amount spent (USD): <\$100
Potential Reach: 100K - 500K people

See Ad Details

● Inactive
Jul 26, 2020 - Jul 31, 2020
ID: 651847102085788

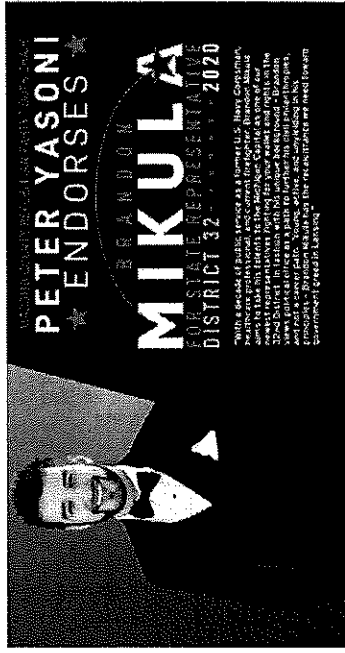


📢 About social issues, elections or politics

Brandon Mikula for State Representative
Sponsored • Paid for by Brandon Joseph Mikula

I am proud to have the endorsement of Peter Yasoni, the Macomb County Republican Party Youth Chair. Peter is a man of great integrity and works passionately to organize the next-generation of Republicans to take the mantle of leadership at the local and state levels.

Join Peter on August 4th in voting for Brandon J. Mikula to b...



Amount spent (USD): \$100 - \$199
Potential Reach: 100K - 500K people

See Ad Details

● Inactive

Jul 23, 2020 - Jul 27, 2020

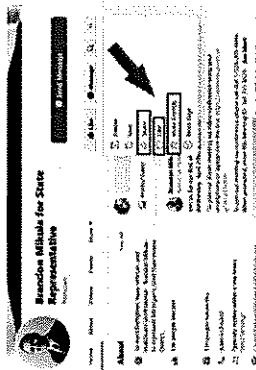
ID: 281706296228207



● About social issues, elections or politics

Brandon Mikula for State Representative
Sponsored - Paid for by Brandon Joseph Mikula

Help us spread our message by liking and sharing our page - as well as inviting those on your friends list! We strive to be as engaged, and active, in the community as possible - and this is one of the ways we can do that! It is important that Michiganders have the ability to easily access their elected representatives - an area that some politicians fall short in. ...



● Amount spent (USD): <\$100

● Potential Reach: 100 - 1K people

See Ad Details

● Active

Started running on Jul 22, 2020

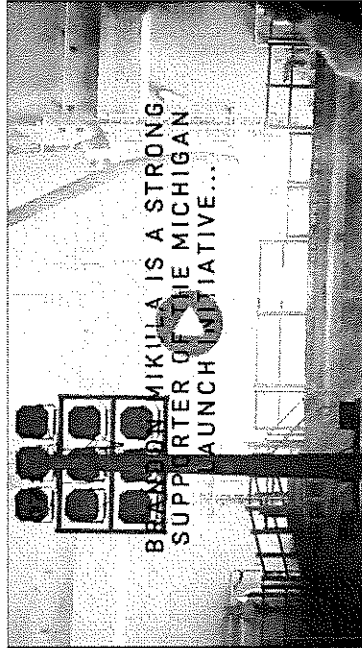
ID: 276678106956283



● About social issues, elections or politics

Brandon Mikula for State Representative
Sponsored - Paid for by Brandon Joseph Mikula

We are on the precipice of a "New Space Age" and Michiganders in the 32nd District have a choice to make on August 4th. Do you want to see our communities, and state, be at the forefront of this new endeavor, and all the economic prosperity that entails - or should we be left "in the dust" by our current representative? ...



WWW.MIKULAFORHOUSE.COM
Launching Michigan Forward

● Amount spent (USD): \$200 - \$299

● Potential Reach: 100K - 500K people

● Active

Started running on Jul 19, 2020

ID: 376912133311784

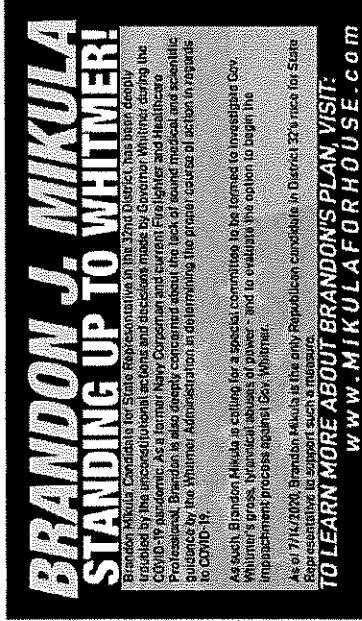


● About social issues, elections or politics

Brandon Mikula for State Representative
Sponsored - Paid for by Brandon Joseph Mikula

Our official statement in support of efforts to impeach Governor Whitmer:

"Brandon Mikula, Candidate for State Representative in the 32nd District, has been deeply troubled by the unconstitutional actions and decisions made by Governor Whitmer during the COVID-19 pandemic. As a former Nav...



Brandon Mikula for State Representative

Learn ...

● Amount spent (USD): \$100 - \$199

● Potential Reach: 100K - 500K people

4

Inactive

Started running on Jul 17, 2020

ID: 969397526861705



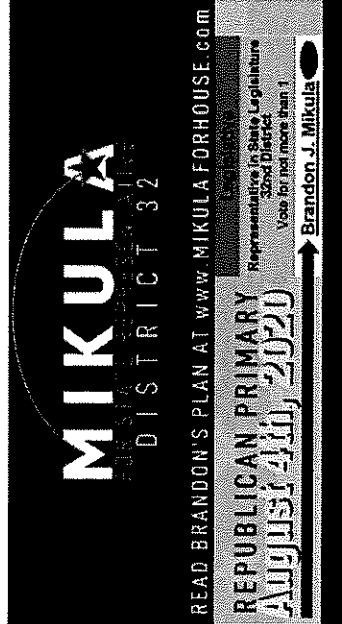
...

About social issues, elections or politics


Brandon Mikula for State Representative
 Sponsored - Paid for by Brandon Joseph Mikula

The 32nd District deserves a representative that is engaged in our communities, that is representing the interests of the district and improving the lives of our fellow Michiganders, and that has a #HistoryOfService.

Make sure to have your voice heard on August 4th and vote for veteran and firefighter, Brandon J. Mikula, to be your...



Amount spent (USD): \$100 - \$199

Potential Reach: 100K - 500K people

See Ad Details

2

Active

Started running on Jul 17, 2020

ID: 608585326753915



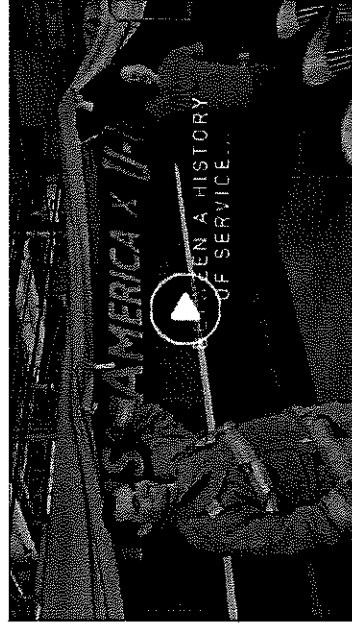
...

About social issues, elections or politics


Brandon Mikula for State Representative
 Sponsored - Paid for by Brandon Joseph Mikula

The 32nd District has a choice to make on August 4th - one between the same "politics as usual" or one of service and a brighter tomorrow. What are you going to choose?

If you choose a brighter tomorrow and a history of service - be sure to vote for Brandon J. Mikula to be your next Republican State Representative....



WWW.MIKULAFORHOUSE.COM
A Choice To Make

Amount spent (USD): \$200 - \$299

Potential Reach: 100K - 500K people

See Ad Details

3

Inactive

Jul 14, 2020 - Jul 18, 2020

ID: 308647303513688



...

About social issues, elections or politics


Brandon Mikula for State Representative
 Sponsored - Paid for by Brandon Joseph Mikula

To elect Navy veteran and local firefighter, Brandon J. Mikula, as the next Republican representative to Michigan's 32nd State House District.



Brandon Mikula for State Representative
Politician
659 people like this

Like...

Amount spent (USD): <\$100

Potential Reach: 100K - 500K people

See Ad Details

2

Inactive

Jul 14, 2020 - Jul 18, 2020

ID: 597633854474661



...



About social issues, elections or politics



Brandon Mikula for State Representative
ABC World News Tonight with David Muir's post

Sponsored • Paid for by Brandon Joseph Mikula

As a former Hospital Corpsman and U.S. Navy veteran - I am devastated to hear of this tragic news. My prayers are with my brothers and sisters who have been injured as a result of the fire and I wish them a speedy recovery. My thoughts are also with the rest of the crew of the USS Bonhomme Richard as they cope with this terrible situation in the days to come.



Brandon Mikula for State Representative

JUST IN: Eleven sailors transported to hospital for minor injuries following explosion on Navy ship in San Diego, officials say.

ABCNEWS.GO.COM

11 sailors hospitalized after explosion on San Diego naval ship
Several sailors were injured following an explosion at a San Diego naval base Sunday, officials said.

\$ Amount spent (USD): <\$100

👤 Potential Reach: 100K - 500K people

2

Inactive

Jul 4, 2020 - Jul 9, 2020

ID: 756769311531325



...



About social issues, elections or politics



Brandon Mikula for State Representative
Sponsored • Paid for by Brandon Joseph Mikula

#IndependenceDay
#TeamMikula
#HistoryOfService



Happy Independence Day!

\$ Amount spent (USD): <\$100

👤 Potential Reach: >1M people

See Ad Details



Brandon Mikula for State Representative

Sponsored • Paid for by Brandon Joseph Mikula

Beautiful day to be out putting up signs with #TeamMikula!
We are working tirelessly to get our message out in as many ways as we can so that Michiganders in the 32nd District, come August 4th and November 3rd, receive the conservative representation they deserve!

This campaign would not be possible without the...



💰 Amount spent (USD): <\$100

👤 Potential Reach: >1M people

● Inactive
Jun 25, 2020 - Jun 30, 2020
ID: 6805909085853113



📢 About social issues, elections or politics

Brandon Mikula for State Representative
Sponsored - Paid for by Brandon Joseph Mikula



Learn more about Brandon Mikula, his vision for the 32nd District, upcoming events - and how to get involved with #TeamMikula! Michiganders in the 32nd District deserve representation with a #HistoryOfService.



MIKULAFORHOUSE.COM
Brandon J. Mikula (R) for State Representative

Learn ...

💰 Amount spent (USD): <\$100
👤 Potential Reach: >1M people

See Ad Details

● Inactive
Jun 25, 2020 - Jun 30, 2020
ID: 2768883880328390

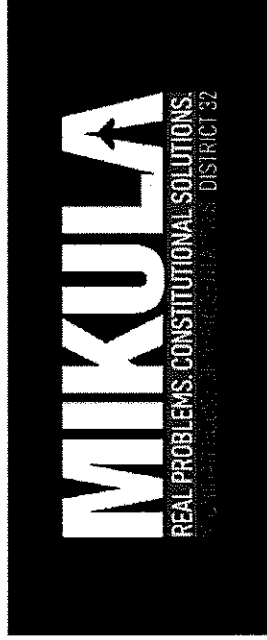


📢 About social issues, elections or politics

Brandon Mikula for State Representative
Sponsored - Paid for by Brandon Joseph Mikula



To elect firefighter, Navy veteran, and healthcare professional - Brandon Mikula - to be the next Republican representative to Michigan's 32nd State House District.



Brandon Mikula for State Representative
Politician
659 people like this

👍 Like...

💰 Amount spent (USD): <\$100
👤 Potential Reach: >1M people

See Ad Details

● Inactive
Jun 19, 2020 - Jun 24, 2020
ID: 2331891100447738

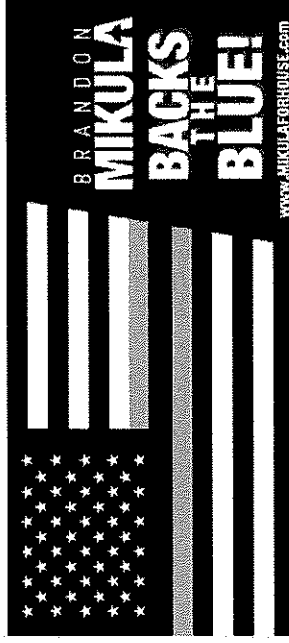


📢 About social issues, elections or politics

Brandon Mikula for State Representative
Sponsored - Paid for by Brandon Joseph Mikula

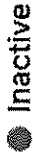


We at #TeamMikula fully support the hardwork and dedication of law enforcement departments not only in Michigan - but across the United States. There will always be bad actors in any profession, and in regards to law enforcement, we should certainly do everything possible to root out those individuals before they can cause irreversible harm to innocent citizens. This does not mean we should attack the vast majority of...



💰 Amount spent (USD): <\$100
👤 Potential Reach: >1M people

See Ad Details



Inactive

Jun 18, 2020 - Jun 23, 2020

ID: 725567804929562



Jun 18, 2020 - Jun 23, 2020

ID: 974093513048667



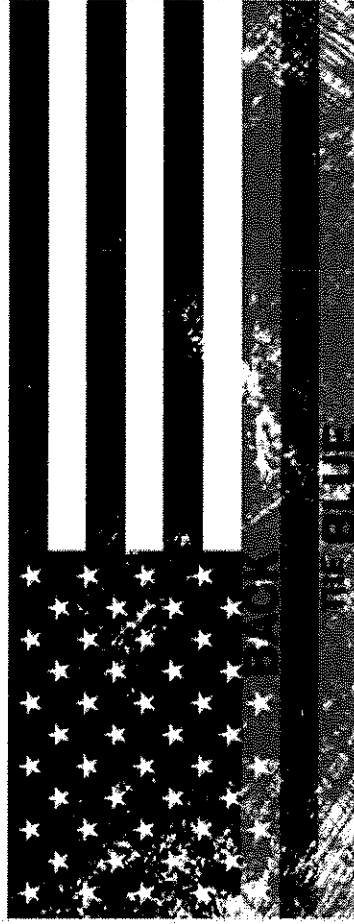
About social issues, elections or politics



Brandon Mikula for State Representative

Sponsored • Paid for by Brandon Joseph Mikula

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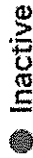


Amount spent (USD): <\$100



Potential Reach: >1M people

[See Ad Details](#)



Inactive

Jun 18, 2020 - Jun 23, 2020

ID: 974093513048667



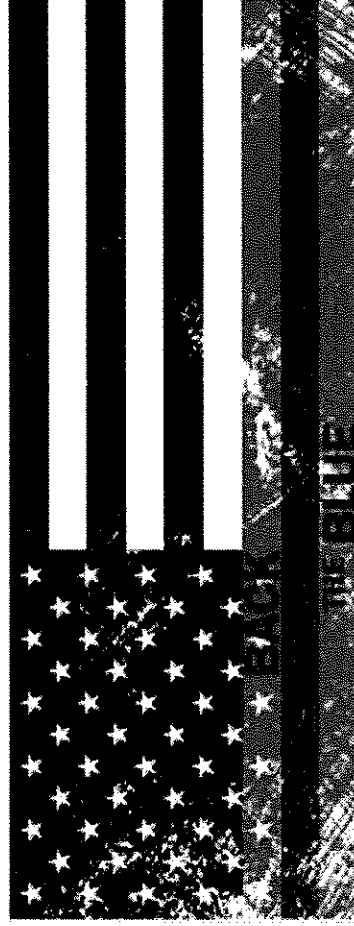
About social issues, elections or politics



Brandon Mikula for State Representative

Sponsored • Paid for by Brandon Joseph Mikula

We at #TeamMikula fully support the hardwork and dedication of law enforcement departments not only in Michigan - but across the United States. There will be always be bad actors in any profession, and in regards to law enforcement, we should certainly do everything possible to root out those individuals before they can cause irreversible harm to innocent citizens. This does not mean we should attack the vast majority of...



Amount spent (USD): <\$100



Potential Reach: >1M people

[See Ad Details](#)



Brandon Mikula for State Representative

Sponsored • Paid for by Brandon Joseph Mikula

As someone who has served in the military - and worked on Selfridge Air National Guard Base for some time - I am keenly aware of not only its strategic importance, but also its economic impact on the 32nd District. I have been making constant inquiries as to expanding the potential of this great installation - such as bringing the Michigan Launch Initiative to the base....



Amount spent (USD): <\$100



Potential Reach: >1M people

● Inactive

Jun 16, 2020 - Jun 21, 2020

ID: 579161139662644



...



About social issues, elections or politics



Brandon Mikula for State Representative

Sponsored • Paid for by Brandon Joseph Mikula

Thank you to the St. Clair County Issues Committee for letting me speak at their weekly meeting! The reception was great and I was very excited to share the vision of #TeamMikula as the next Republican State Representative to the 32nd District.

Some of the issues discussed were:...

💰 Amount spent (USD): <\$100

👤 Potential Reach: >1M people

See Ad Details

● Inactive

Jun 10, 2020 - Jun 15, 2020

ID: 186186576104482



...



About social issues, elections or politics



Brandon Mikula for State Representative

Sponsored • Paid for by Brandon Joseph Mikula

I am to happy to announce the launch of the #TeamMikula website! You can find more detailed information regarding our vision for the 32nd District on the website - as well as upcoming events, opportunities to volunteer, and campaign-related news!

We at #TeamMikula offer many thanks to our awesome...

💰 Amount spent (USD): <\$100

👤 Potential Reach: >1M people

See Ad Details

● Inactive

Jun 8, 2020 - Jun 13, 2020

ID: 728732651033319



...



About social issues, elections or politics

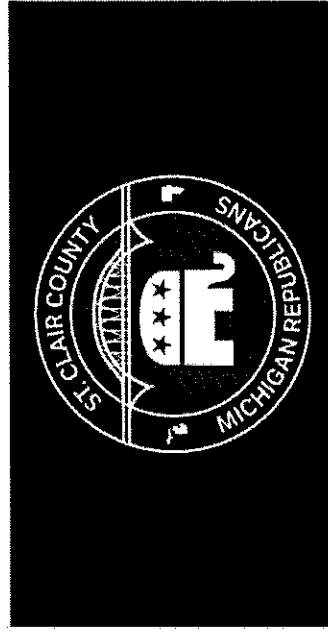


Brandon Mikula for State Representative

Sponsored • Paid for by Brandon Joseph Mikula

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Some of the issues discussed were:...



SCGOP.ORG

St. Clair County, MI Republican Party

We believe individuals, not government, can make the best decisions; all people are entitled to equal rights; and decisions are best made close to...

💰 Amount spent (USD): <\$100

👤 Potential Reach: >1M people

● Inactive

Jun 4, 2020 - Jun 8, 2020

ID: 646618932729491



● Inactive

Jun 2, 2020 - Jun 8, 2020

ID: 658927838023784



About social issues, elections or politics



About social issues, elections or politics



About social issues, elections or politics



Brandon Mikula for State Representative

Sponsored - Paid for by Brandon Joseph Mikula

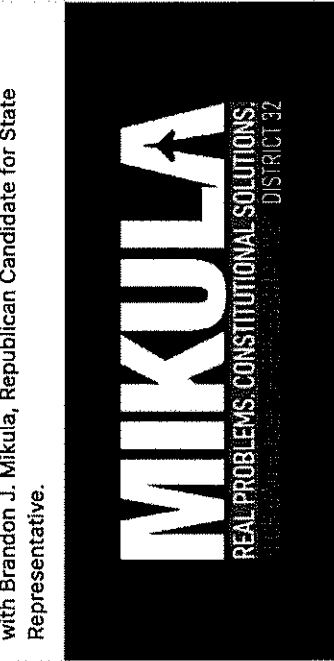
Second #TeamMikula Virtual Town Hall! Open forum to discuss the issues that are effecting Michiganders in the 32nd District with Brandon J. Mikula, Republican Candidate for State Representative.



Brandon Mikula for State Representative

Sponsored - Paid for by Brandon Joseph Mikula

Second #TeamMikula Virtual Town Hall! Open forum to discuss the issues that are effecting Michiganders in the 32nd District!



MON, JUN 8, 2020

Second Virtual Town Hall

Chesterfield Township, Michigan

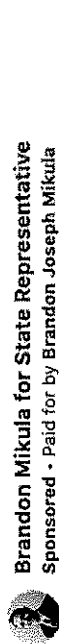
Second Virtual Town Hall

[View E...](#)

Amount spent (USD): <\$100

Potential Reach: >1M people

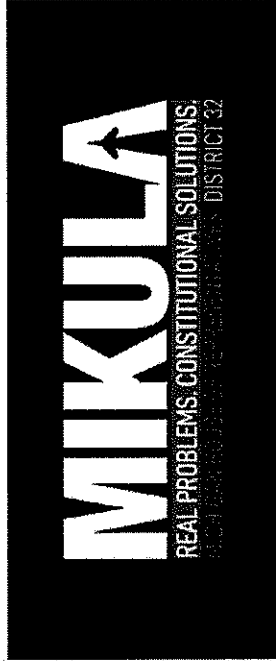
[See Ad Details](#)



Brandon Mikula for State Representative

Sponsored - Paid for by Brandon Joseph Mikula

Second #TeamMikula Virtual Town Hall! Open forum to discuss the issues that are effecting Michiganders in the 32nd District!



MON, JUN 8, 2020

Second Virtual Town Hall

Chesterfield Township, Michigan

Second Virtual Town Hall

[View E...](#)

Amount spent (USD): <\$100

Potential Reach: >1M people

[See Ad Details](#)



THETIMESHERALD.COM

Republican state rep. incumbents face challengers in 81st, 32nd district August primaries
State Reps. Gary Eisen, R-St. Clair Township, and Pamela Hornberger, R-Chesterfield, are seeking reelection.

Amount spent (USD): <\$100

Potential Reach: >1M people

● Inactive

Jun 2, 2020 - Jun 7, 2020

ID: 1210176375995656



About social issues, elections or politics




Brandon Mikula for State Representative

Sponsored - Paid for by Brandon Joseph Mikula

Thank you to Jackie Smith at the Port Huron Times Herald for providing voters an introduction to our campaign. This article highlights one of the core reasons of why I'm running and the stark differences between myself and my opponent.

My opponent has, according to the article, let her teachin...

 About social issues, elections or politics



Brandon Mikula for State Representative
Sponsored • Paid for by Brandon Joseph Mikula


An historic day for the United States, NASA, and commercial space flight! SpaceX is paving the way for a renaissance in American space exploration, one step at a time.


Our campaign has advocated strongly for the Michigan Launch Initiative, of which SpaceX is a core investor - and this launch further shows the merit and importance of the commercial...




FOXNEWS.COM

SpaceX makes history, launches NASA astronauts into space from US soil for the first time since 2011
SpaceX has launched NASA astronauts Doug Hurley and Bob Behrken on their historic Demo-2 mission to the International Space Station. The mission is the...

 Amount spent (USD): <\$100

 Potential Reach: >1M people

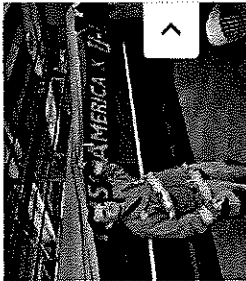
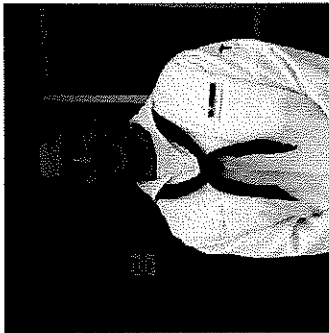
 About social issues, elections or politics




Brandon Mikula for State Representative
Sponsored • Paid for by Brandon Joseph Mikula

My life has been devoted to public service - be that in the military, as a firefighter, at the emergency room, or in treatment centers for children. Michiganders, and the 32nd District, deserve someone who has that background - someone who has always put others before self.


We need a representative that answers to the people and i...



 Amount spent (USD): <\$100

 Potential Reach: >1M people

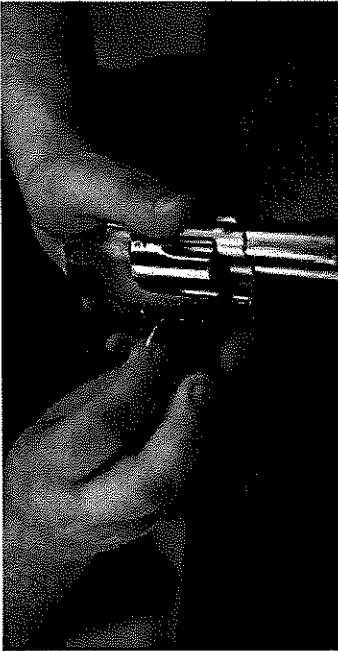
[See Ad Details](#)

 About social issues, elections or politics




Brandon Mikula for State Representative
Sponsored • Paid for by Brandon Joseph Mikula


Applications for new Concealed Pistol Licenses (CPL) should have never been stopped in the first place - county clerks across Michigan took away a fundamental right for Michiganders to protect themselves. That being said, Michiganders shouldn't even need to have a CPL - Michigan should be a constitutional carry state and follow the Second Amendment as it was written....



THETIMESHERALD.COM


County Clerk's Office scheduling appointments for new CPL applications
"We are excited to begin to get back to some level of normalcy at the clerk's office. I'm certain we are able to provide the much needed service in a safe a...

 Amount spent (USD): <\$100

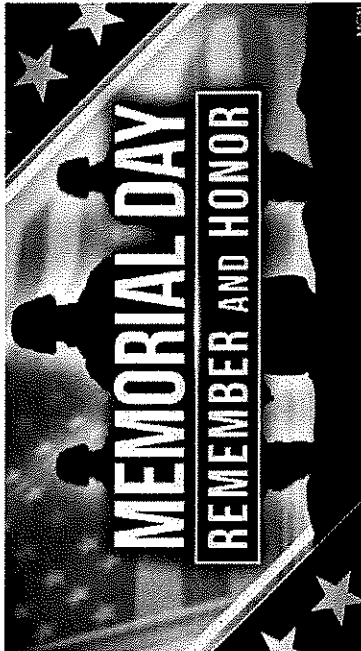
 Potential Reach: >1M people

[See Ad Details](#)

📢 About social issues, elections or politics

 **Brandon Mikula for State Representative**
Sponsored - Paid for by Brandon Joseph Mikula

As a veteran, I have always had an especially deep respect for Memorial Day. Be it the Crossing of the Delaware during the Revolutionary War, the valiant charge at Belleau Wood during the First World War, the D-Day landings during the Second World War, or the street-to-street fighting at Fallujah in Iraq - the brave men and women of our Armed Services, who have given the ultimate sacrifice, deserve our deepest respect, ou...




Brandon Mikula for State Representative
Politician

Send

💰 Amount spent (USD): <\$100
👤 Potential Reach: >1M people

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📢 About social issues, elections or politics

 **Brandon Mikula for State Representative**
Sponsored - Paid for by Brandon Joseph Mikula


We need to continue to fight against the unconstitutional executive orders of Governor Whitmer. Protests like "Operation Haircut" are doing just that - but these brave men and women cannot do it alone. We need to see our representatives in Lansing doing more to combat these outrageous overreaches by Governor Whitmer - I was always told throughout life that "talk is cheap and actions speak..."



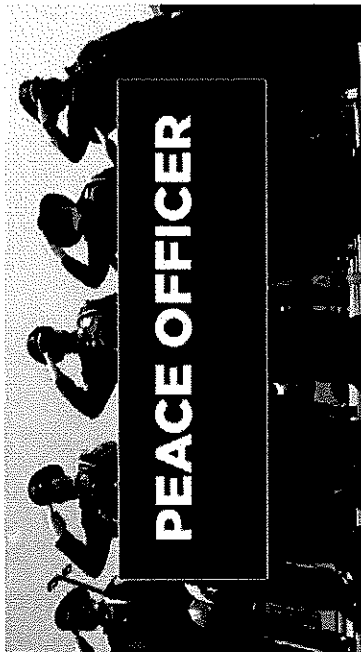
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Officers issue multiple citations to barbers at state Capitol protest; conservative organizers pledge to cover costs
Michigan State Police issued \$1,000 citations to any offending barbers, which would be covered by a fundraiser started by the Michigan Conservative...

💰 Amount spent (USD): <\$100
👤 Potential Reach: >1M people

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 **Brandon Mikula for State Representative**
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As a firefighter and veteran, I am only too keenly aware of the sacrifices that our law enforcement officers at the local, county, state, and federal levels make every day to ensure the safety and well-being of our communities. These brave men and women put on the uniform every day, not knowing what each shift will bring, and they do so without hesitation. It takes a special type of person, with a strong resolve and sense of...



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👤 Potential Reach: >1M people

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About social issues, elections or politics



Brandon Mikula for State Representative

Sponsored • Paid for by Brandon Joseph Mikula

To elect firefighter, Navy veteran, and healthcare professional - Brandon Mikula - to be the next Republican representative to Michigan's 32nd State House District.



Brandon Mikula for State Representative

Politician

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\$ Amount spent (USD): <\$100

👤 Potential Reach: >1M people

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About social issues, elections or politics



Brandon Mikula for State Representative

Sponsored • Paid for by Brandon Joseph Mikula

A victory for "America's Barber" and liberty as a whole. Governor Whitmer has long overstepped her bounds and this is but a first step in reeling back that power. Michiganders have been leading the way nationally in combating unconstitutional orders and the infringement of our rights as Americans. We need to continue to fight - and you can be rest assured as the next Republican representative to the 32nd...



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Judge won't order Owosso barber to close shop yet, but he faces 2 misdemeanors after reopening during...
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Apr 24, 2020 – Apr 28, 2020
ID: 2510965709165693



About social issues, elections or politics



Brandon Mikula for State Representative

Sponsored • Paid for by Brandon Joseph Mikula

Join us for our first virtual town hall via Zoom (see details below) on Wednesday, April 29th, at 8:00 PM!

"To join our Zoom meeting via video conference using your smartphone or laptop click this link:
<https://us04web.zoom.us/j/3653118929>



Brandon Mikula for State Representative



Firefighter • Conservative • Veteran

Virtual Town Hall

Wednesday, April 29th,
2020
at
8:00 PM

WED, APR 29, 2020

Virtual Town Hall

Chesterfield Township, Michigan

Virtual Town Hall

View E...

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👤 Potential Reach: >1M people

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About social issues, elections or politics



Brandon Mikula for State Representative

Sponsored • Paid for by Brandon Joseph Mikula

Firefighter. Conservative. Veteran.

Brandon Mikula for State Representative (MI-32)



Brandon Mikula for State Representative

Politician

659 people like this

Like...

💰 Amount spent (USD): <\$100

👤 Potential Reach: >1M people

See Ad Details

Smith, Jessica (MDOS)

From: Fracassi, Adam (MDOS)
Sent: Thursday, October 29, 2020 1:54 PM
To: Smith, Jessica (MDOS)
Subject: FW: Mikula Complaint
Attachments: Complaint.zip

New complaint. This is the one I was talking about

From: Kristin Combs <kcombs@lambert.com>
Sent: Wednesday, October 21, 2020 7:26 PM
To: Fracassi, Adam (MDOS) <FracassiA@michigan.gov>
Subject: FW: Mikula Complaint

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

Hello Adam,

I am just circling back on this complaint. Did you receive this last week?

I never heard back and haven't seen any record of it on Mr. Mikula's candidate committee page. Can you tell me what next steps are for the bureau to investigate the complaint?

Thanks for your help.

Kristin

Kristin Combs, Lambert & Co.
Political Director
O: 517.267.9017 M: 517.819.2841

From: Kristin Combs
Sent: Wednesday, October 14, 2020 3:38 PM
To: Fracassi, Adam (MDOS) <FracassiA@michigan.gov>
Subject: RE: Mikula Complaint

It was submitted via mail but yes, let me resend! Here you go.

Let me know if there is anything else you need.

Thanks!

Kristin Combs, Lambert & Co.

Political Director

O: 517.267.9017 M: 517.819.2841

From: Fracassi, Adam (MDOS) <FracassiA@michigan.gov>

Sent: Wednesday, October 14, 2020 3:19 PM

To: Kristin Combs <kcombs@lambert.com>

Subject: RE: Mikula Complaint

Hi Kristin,

I don't have any record of receiving a complaint against Brandon Mikula. Did you email or mail it? Will you please resend it to me (email is okay)?

Thanks,
Adam

From: Kristin Combs <kcombs@lambert.com>

Sent: Wednesday, October 14, 2020 3:02 PM

To: Fracassi, Adam (MDOS) <FracassiA@michigan.gov>

Subject: Mikula Complaint

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

Hi Adam,

I am writing to check on the status of a complaint filed against Brandon Mikula who ran for state rep. in the Republican primary. It looks like the complaint was filed against "Brandon Mikula for State Rep." but his CTE name is Citizens for Brandon Mikula. Not sure if it needs to be refiled or if the bureau will honor it as-is?

Please advise. Thanks!

Kristin

Kristin Combs
Political Director

Office: 517.267.9017
Mobile: 517.819.2841

www.lambert.com



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

January 25, 2021

Brandon Mikula
15265 Windmill Drive
Macomb, MI 48044

Re: *Forbert v. Mikula*
Campaign Finance Complaint
No. 2020-10-193-33

Dear Mr. Mikula:

The Department of State (Department) received a formal complaint filed by Mark Forbert against you alleging that you violated 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.

Section 24 requires committees to file a statement of organization with the proper filing official within 10 days after the committee is formed. MCL 169.224(1). On the statement of organization, a request for a reporting waiver is granted until the candidate committee spends or receives in excess of \$1,000 at which point, the reporting obligations of section 33 are triggered.

Section 33 requires candidates and committees file contributions and expenditures with the appropriate filing official by specific dates. MCL 169.233(1) – (3). The MCFA requires a committee that receives or expends more than \$1,000 during any election to file campaign finance reports in compliance with the Act. MCL 169.233(6). A person who knowingly omits or underreports expenditures required to be disclosed by the Act is subject to a civil fine of not more than \$1,000 or the amount of the expenditures omitted or underreported, whichever is greater. MCL 169.233(11).

Mr. Forbert alleges that your committee's Facebook page has spent more than \$1,000 in advertisements therefore making you ineligible to receive the reporting waiver. Mr. Forbert further alleges that since you were no longer eligible for the reporting waiver, you were required to file reports under section 33.

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. Please submit any response via email to Elections@Michigan.gov. All materials may also be sent to the Department of State, Bureau of Elections, Richard H. Austin Building, 1st Floor, 430 West 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 Mr. Forbert, 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 penalty provided in section 33(11) 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

c: Mark Forbert

February 15, 2021

Mr. Fracassi,

Before I detail my response to the complaint filed against my committee, I wish to express our *profound* desire to correct *any* mistakes, or misinterpretations, of Section 24, Appendix C, of the MCFA. As a public servant for a decade – from my time in the United States Navy, as a firefighter, or as a healthcare worker, it has been my motivation to serve the public to the best of my ability – and this is no exception. This was my first venture into politics and at every point during my campaign I strived for the utmost transparency. As of this letter, we have already taken the proactive step of filing a post-election statement for the August 4th, 2020, Primary Election – as was requested by Mr. Forbert in his complaint against my committee. Should the Bureau of Elections determine that our campaign committee needs to correct any other error on our behalf, I *will ensure* those corrections are done in the *most expedited* manner possible.

On February 14, 2021, I was made aware of a complaint filed against my campaign committee (*Citizens for Brandon Mikula*) by one Mark Forbert of Chesterfield, Michigan. This complaint alleged that our committee violated Section 24, Appendix C, of the Michigan Campaign Finance Act (MCFA) – specifically by exceeding the \$1,000 eligibility threshold for a financial reporting waiver during the August 4th, 2020, primary campaign cycle. This complaint states that the committee spent \$4,834.41 on Facebook advertisements during the campaign. The only other expenditure of the committee during this time was for yard signs totaling the amount of \$225.50. No donations were received (excluding a loan to the committee by the candidate¹), campaign staff worked in a volunteer capacity virtually, and all campaign activities were done virtually through free services – accruing no additional campaign expenditures.

At the time of the filing of our reporting waiver, our committee did not expect to exceed the \$1,000 threshold as described in Section 24, Appendix C, of the MCFA – the committee, however, did exceed this amount but *after* the deadlines for both the Pre-Election and 48 Hour/Late Contribution Reports for the August 4th, 2020, Primary Election. Specifically, the committee exceeded this threshold on August 7th, 2020, when the aforementioned Facebook advertisements were posted for payment to the committee. For further clarification, at the time of the 2020 Primary Campaign Cycle, Facebook did not charge for political advertisements when they were submitted – instead, Facebook charged accounts *after all* political advertising ceased for that particular account. Our committee posted our last Facebook advertisement on August 4th, 2020, and then, as previously noted, were charged for all subsequent advertisements on August 7th, 2020 – prior to that date, Facebook only offered *projections* of the maximum cost of an advertisement (as seen in the images provided by the complainant,) though these projections could, by the guidelines of Facebook, *vary wildly and end up at much lower amounts* based on a number of factors (amount of users reached, duration, etc.) – which made it nearly-impossible

¹ Loans were made by candidate on June 15th, 2020, and August 7th, 2020, for \$225.50 and \$4,834.41, respectively.

for our committee to accurately predict if we would indeed exceed the \$1,000 reporting waiver threshold.

Since the final, official, costs for these advertisements were not posted until August 7th, 2020, *after* our defeat in the August 4th, 2020, primary – and the only accrued charges to the committee prior to the last pre-primary election finance report was \$225.50 for yard signs (under the \$1,000 reporting waiver threshold,) I, nor my campaign finance manager, believed it was necessary to file a campaign finance statement after that point as the campaign ended on August 4th, 2020, with our defeat, and we did not proceed to a general election. We consulted the following language in Section 24, Appendix C, of the MCFA, for this decision:

“LOSS OF THE WAIVER: A committee automatically loses its Reporting Waiver if it exceeds \$1,000.00 in receipts, expenditures or debt during the calendar year or for the election (as applicable). If the Reporting Waiver is lost, the committee must file the next required campaign statement and all subsequent statements until the Reporting Waiver is regained. The first campaign statement filed after the loss of a Reporting Waiver must begin on either:

- *January 1st of the year in which the Reporting Waiver was lost, or*
- *The day following the last date covered if this date is after January 1st.”*

Specifically, we consulted, *“the committee must file the next required campaign statement and all subsequent statements until the Reporting Waiver is regained.”* Since we were no longer campaigning after August 4th, 2020, we did not believe there were any further campaign statements that needed to be filed - if this interpretation was incorrect on our behalf, I will ensure that any financial statements that the Bureau of Elections deems necessary are filed in the **most expedited** manner possible for public record. As I mentioned at the start of this letter, however, we have already taken the proactive step of filing a post-election campaign financial statement to address the concerns of Mr. Forbert in his complaint.

If you require **any** further information from myself, you can reach me anytime at (586) 612-6303, or at citizensforbrandonmikula@hotmail.com – I will be more than happy to assist you, or the Bureau of Elections, in any way possible. Thank you for your time.

Very respectfully,

Brandon J. Mikula

Brandon Joseph Mikula.



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

April 21, 2021

Mark Forbert
50616 Martinique Street
New Baltimore, MI 48047

Dear Mr. Forbert:

The Department of State received a response to the complaint you filed against Brandon Mikula, 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, 1st 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: Brandon Mikula

May 12, 2021

RECEIVED/FILED
MICHIGAN DEPT OF STATE
2021 MAY 18 PM 1:38
ELECTIONS/GREAT SEAL

Mr. Adam Fracassi
Michigan Department of State, Bureau of Election
Richard H. Austin Building
430 W. Allegan
First Floor
Lansing, MI 48918

Mr. Fracassi,

I recently received a response to my complaint filed against Mr. Brandon Mikula for campaign finance violations. While I appreciate Mr. Mikula's effort, his integrity is to be questioned. Mr. Mikula has run for office before-a simple google search will show his candidacy for Congress. The information contained in my original complaint should be more than sufficient to show that Mr. Mikula's campaign spent more than \$1000 prior to the primary which would cause him to lose his campaign finance waiver and require him to file a pre-primary and post primary report. Each screenshot includes dates and amounts spent. Facebook requires immediate payment to run ads even if it is on a credit card. Ignorance of law excuses no one. The Michigan SOS has extensive material on the requisite candidate laws which includes similar sentiments and makes training mandatory for use of MERTS software. Mr. Mikula should have done his homework if he wants to be the one making laws.

Please do not hesitate to contact me should you need any additional information.

Thank you,

Mark Forbert
50616 Martinique Street
New Baltimore, MI 48047



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

July 27, 2021

Brandon Mikula
15265 Windmill Drive
Macomb, MI 48044

Via email

Dear Mr. Mikula:

The Department of State ("Department") has finished its investigation into the complaint filed against you by Mark Forbert which alleged violations of the Michigan Campaign Finance Act ("MCFA" or "Act"), 1976 P.A. 388, MCL 169.201 *et seq.* This letter concerns the disposition of your complaint.

The complaint was filed with the Department on September 30, 2020 and stated that you did not properly file complete campaign financial statements following your campaign's surpassing of the \$1,000.00 reporting waiver threshold. Mr. Forbert provided evidence of your campaign's advertisement funding on Facebook. He submitted screenshots of the total amount your campaign paid for specific Facebook advertisements as well as the total amount spent on advertising during certain date ranges. For example, based on the provided Facebook records, from May 7 to September 28, 2020 your campaign spent \$4,501.00 on advertisements. Mr. Forbert also provided Facebook's records on your campaign's advertisement spending from May 2018 to July 31, 2020—the timeframe leading up to the August 4 Primary Election—equaling \$2,459.00.

In your response to the complaint by letter dated February 15, 2021, you stated that you had a good faith belief that your committee would not exceed the \$1,000.00 reporting waiver threshold. You noted that the threshold was only surpassed *after* the August 4, 2020 Primary Election on August 7, 2020, making it impossible to comply with the MCFA's pre-election filing deadlines. Although the Facebook advertisements were running prior to this election, you stated that you did not know and that it was *impossible* to know how much those advertisements would individually, or in total, cost because Facebook only provides a "projection" of the cost, which varies depending on multiple factors including total audience reached and duration the advertisement is run. You acknowledged the only guaranteed cost incurred prior to the pre-election filing deadline was the \$225.50 your campaign spent on yard signs, which is under the \$1,000.00 reporting threshold. Finally, you informed the Department that you have filed a post-election statement to remedy Mr. Forbert's complaint.

By letter dated May 21, 2021, Mr. Forbert submitted a rebuttal to your complaint response reiterating his belief that you failed to properly file a pre-election campaign statement. He

disputed your claim that individuals only pay for Facebook advertising after the campaign's conclusion, arguing instead that Facebook requires immediate payment to run advertisements. The primary issue in this case is whether you spent or received over \$1,000.00 during the time prior to the election and therefore exceeded the reporting waiver threshold prior to the pre-election reporting period. Based on the arguments and evidence provided, the Department concludes that a violation has occurred as you could have reasonably known prior to this pre-election filing period that your campaign spent more than \$1,000.00, triggering pre-election reporting requirements under the MCFA; however, the Department is dismissing this complaint due to ambiguity in how the MCFA governs online social media advertisement spending and reporting requirements.

Committees are required to file a statement of organization within ten (10) days after the committee is formed. MCL 169.224(1). Committees may indicate in a written statement that the committee does not expect for an election to receive an amount in excess of \$1,000.00 or expend an amount in excess of \$1,000.00. MCL 169.224(5) – (6). However, committees that do receive or spend over \$1,000.00 during a period covered by a filing must then file their contributions and expenditures with the Department. MCL 169.233(1) – (3), (6).

To assess this complaint, the Department reviewed Facebook's policy on advertisement payments. Facebook allows candidates to set a "budget," which it describes as the "total amount you want to spend daily or over the course of the campaign," which is editable by the candidate at any time. The candidate also sets a "bid" or the "maximum amount [they're] willing to pay when someone sees [their] ad." Once a candidate sets a budget and bid, the advertisements associated with the candidate's Facebook page have their audience "reach" adjusted to be within that total amount. Even if the advertisement reaches more (or less) people, the amount spent on the ad should stay under that threshold budget. Facebook specifically states that "[w]e'll [Facebook] never spend more than your max" budget on advertising.
<https://www.facebook.com/business/ads/pricing>.

Based on the Department's interpretation and understanding of Facebook's policy, your claim that Facebook only gave you projections is more plausible than Mr. Forbert's claim that Facebook requires upfront payments for running advertisements on the social media platform. Even if you gave Facebook a budget maximum, it seems impossible for you to have known a definitive amount any individual advertisement would have cost your campaign as the exact number would depend on the ultimate number of individuals "reached" by the advertisement. Therefore, it would have been impossible for you to have known the total amount your campaign would have spent on your Facebook advertisements prior to the Primary Election (within the pre-election reporting period) and whether that amount surpassed the \$1,000.00 reporting waiver threshold in MCL 169.224(5).

The Department agrees it was impossible for you to have known the exact amount exceeded \$1,000.00 prior to the Primary Election, however, the Department concludes you should have reasonably known the total amount that your pre-election advertisements would have cost would exceed the reporting waiver threshold. Although Facebook only gives candidates projections prior to the conclusion of the running of an advertisement, candidates can set a maximum, or "ceiling," that they are willing to spend on those advertisements. This ceiling can be set for individual advertisements or as an overall amount. Therefore, acting on your good faith belief that your campaign would not spend more than \$1,000.00, you could have told Facebook your

ceiling was \$1,000.00 and adjusted the total duration and reach of your advertisements based on this maximum. For example, you could have run ten Facebook advertisements with a budget ceiling of \$100 per advertisement to ensure that your campaign would never exceed the \$1,000.00 reporting waiver threshold. The evidence indicates that you spent over \$4,500.00 on Facebook advertisements alone. This amount far exceeds the \$1,000.00 reporting waiver threshold to the point where it is unreasonable to suggest you truly believed you would not surpass that threshold.

However, even though you should have reasonably believed your campaign surpassed the \$1,000.00 reporting waiver threshold, the Department does not find you violated the reporting requirements under MCL 169.233(1) – (3). The MCFA requires committees to report *specific*, not estimated, contribution and expenditure amounts in their campaign statements. MCL 169.226(1). Even if it was reasonable to believe you would surpass the \$1,000.00 reporting waiver threshold, it would have been impossible for you to properly report the amount spent on these advertisements without more than Facebook's projections.

The Department recognizes the confusion that can result when attempting to apply the MCFA to Facebook advertisements. The MCFA was passed in 1984, far before individuals even conceived of Facebook or the social media age. Given the age of the MCFA and technological advances in political campaigns, this part of the Act as it relates to the facts of this case were difficult – if not impossible – to comply with.

With this in mind, the Department dismisses the complaint and will consider options to better accommodate technological advances in campaigns for the future. You are not required to take any further action at this time.

Should you have any questions, please do not hesitate to email me at FracassiA@michigan.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam Fracassi", with a stylized flourish at the end.

Adam Fracassi
Bureau of Elections
Michigan Department of State

c: Mark Forbert