



Michigan Department of State

Campaign Finance Complaint Form

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

RECEIVED/FILED
MICHIGAN DEPT OF STATE

2019 SEP 12 PM 4:41

ELECTIONS/GREAT SEAL

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

Section 1. Complainant			
Your Name		Daytime Telephone Number	
Erin M Fox		517 977 3048	
Mailing Address			
2122 Mary Ave			
City	State	Zip	
Lansing	MI	48910	
Email (optional)			
emfox2020@gmail.com			

Section 2. Alleged Violator			
Name			
ROBIN LIA LAURAIN (aka citizens for Robyn Laurain)			
Mailing Address			
1436 Massachusetts Ave			
City	State	Zip	
Lansing	MI	48906	
Email (optional)			
robin.laurain.ln@gmail.com (701) 460-6512			

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

Section(s) of the MCFA alleged to be violated: MCL 169.233

Explain how those sections were violated: Filing incomplete or inaccurate report. Failure to report post-campaign ~~debt~~ judgment was entered for \$3449.32 in Oct 2018, prior to the end of the election cycle. The alleged violator received notice of this debt obligation prior to the 2018 General Election.

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

Contract between Complainant and violator
Record of Judgment entered Oct 2018

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

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

photocopying, fax transmissions to and from my office, or long distance telephone calls within the United States. I will advise you of any foreseeable expenses that are significant and may ask that you pay these expenses directly.

There is no guarantee of success. If an amount remains due following the campaign and the campaign has no funds available, you will be personally liable to pay that amount.

This consulting shall be performed on a part-time basis for the duration of the contract.

Please acknowledge your acceptance of the terms of this agreement by signing the enclosed extra copy of this letter.

I look forward to working with you on this matter. If you have questions or comments, please contact me at your convenience.

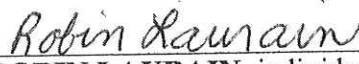
Yours truly,
Great Lakes Campaigns

By /s/


ERIN FOX

Date \ \

Agreed and accepted:


ROBIN LAURAIN, individually
and on behalf of Candidate Committee
Date 05\03\18

66TH DISTRICT COURT
110 E Mack Street
Corunna, MI 48817

Return
Register of Action

Enter New Search

Shiawassee County 66th District Court ROA Details

STATE OF MICHIGAN	CASE NO: 18-0238SC	SC
66TH JUDICIAL DISTRICT	REGISTER OF ACTIONS	

Court Address 110 E. MACK STREET	Court Telephone
CORUNNA MI 48817	(989) 743-2395

JUDGE OF RECORD: CLARKSON, WARD L.,	P-36073
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	Attorney
P01 PLAINTIFF	(CLSD)
GREAT LAKES CAMPAIGNS//	
306 N MERCER ST	
DURAND	MI 48429
(517) 977-3048	

D01 DEFENDANT	(CLSD)
LAURAIN/ROBIN/LEA	
1436 MASSACHUETTS AVE	
LANSING	MI 48906

DATE	ACTIONS, JUDGMENTS, CASE NOTES	INITIALS
07/17/18		
P01	AFFDV & CLM FILED	DEC
P01	CLAIMS SMALL CLAIMS FILED	\$3,323.64 DEC
D01	AFFDV & CLM TO USE OWN PROCESS SRVER (OTHER)	DEC

ALL	HEARING SMALL CLAIMS SCHEDULED	DEC
	08/23/18 11:00A	
07/18/18		
	FILING FEE PAID \$70.00 RCPT # D134381	KNP
	CASH TENDERED	KNP
08/03/18		
	D01 PREV. 306 N PENNSYLVANIA AVE	DEC
	ADDR: LANSING MI 48912	DEC
08/08/18		
D01	AFFDV & CLM PERSONALLY SERVED	\$55.68 DEC
08/20/18		
D01	JUDGMENT SMALL CLAIMS ISSUED	SK
08/21/18		
	D01 PREV. 305 N PENNSYLVANIA AVE	DEC
	ADDR: LANSING MI 48912	DEC
	D01 UNABLE TO BE HERE IN AUG-MOVE TO OCT	DEC
08/22/18		
ALL	HEARING SMALL CLAIMS ADJOURNED	DEC
	08/23/18 11:00A	
ALL	HEARING SMALL CLAIMS SCHEDULED	DEC
	10/11/18 02:00P	
ALL	NOTICE TO APPEAR ISSUED	DEC
10/09/18		
D01	JUDGMENT SMALL CLAIMS ISSUED	DME
10/11/18		
D01	JUDGMENT BY DEFAULT ENTERED	\$3,449.32 DEC
10/23/18		
	P01 PREV. 305 N MERCER ST	DEC
	ADDR: DURAND MI 48429	DEC
11/13/18		
	CVL FEES/OTH PAID \$15.00 RCPT # D143297	KNP

GREAT LAKES CAMPAIGNS/ v LAURAIN/ROBIN/LEA CASE NO: 18-0238SC PAGE 2

DATE	ACTIONS, JUDGMENTS, CASE NOTES	INITIALS
	ATM CARD TENDERED	KNP
	JUDGE OF RECORD/MAGISTRATE CHANGED	DEC
	FROM: 36501 DEGARMO,DALE A.,	DEC
	TO: 36073 CLARKSON,WARD L.	DEC
D01	HEARING FOR DISCOVERY SCHEDULED (RISK)	DEC
	12/21/18 08:30A	
12/20/18		
D01	HEARING SMALL CLAIMS ADJOURNED	DEC
	12/21/18 08:30A	
	NO SERVICE ON DISCOVERY-NEW DATE TO FOLLOW	DEC
	P01 HAS NOT PREPAID PROCESS SERVICE-SO NO	DEC
	SERVICE ON DEF HAS BEEN MADE-PO1 MAY USE HIS	DEC
	OWN SERVER-WE CAN EXTEND DATE TO NEXT MONTH	DEC

FOR NEW HEARING-901 TO LET US KNOW

DEC

01/07/19

RISK RETURNED DISCOVERY AS PREPAYMENT WAS NOT
MADE BEFORE ATTEMPT TO SERVE-NO WORD FROM P01

DEC
DEC

***** END OF REGISTER OF ACTIONS ***** 09/12/19 15:14

Enter New Search



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

September 19, 2019

Robin Lea Laurain
1436 Massachusetts Avenue
Lansing, Michigan 48906

Via Email

Re: *Fox v. Laurain*
Campaign Finance Complaint
No. 2019-09-30-33

Dear Ms. Laurain:

The Department of State (Department) has received a formal complaint filed against you by Erin Fox 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.

Ms. Fox filed her complaint with the Department on September 12, 2019 and alleged that you failed to accurately file campaign finance statements. Specifically, Ms. Fox alleged that you failed to disclose an expenditure for a consulting contract and judgment issued against you totaling \$3,449.32.

The MCFA 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).

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 investigative process is found in the Department's Guidebook, a copy of which is enclosed.

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, 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 Ms. Fox, 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) 373-2540.

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: Erin Fox, via email

Fracassi, Adam (MDOS)

From: Fracassi, Adam (MDOS)
Sent: Thursday, September 19, 2019 1:07 PM
To: robinlaurainlpn@gmail.com
Subject: Fox v. Laurain - Campaign Finance Complaint
Attachments: complaint.pdf; Notice of Complaint.pdf; Complaint Guidebook & Procedures.pdf

Ms. Laurain,

The Department of State has received a campaign finance complaint filed against you by Erin Fox. A copy of the complaint, the Department's notice of intent to investigate, and the Department's guidelines and procedures are included with this email. Should you wish to respond to the allegations in the complaint, they must be submitted within 15 business days of today, or October 10, 2019. If you elect to not file a response, the Department will have no choice but to make a determination based solely upon the allegations presented in the complaint.

If you have any questions, please do not hesitate to contact me.

Adam Fracassi
Bureau of Elections

Fracassi, Adam (MDOS)

From: Microsoft Outlook
To: robinlaurainlpn@gmail.com
Sent: Thursday, September 19, 2019 1:07 PM
Subject: Relayed: Fox v. Laurain - Campaign Finance Complaint

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

robinlaurainlpn@gmail.com (robinlaurainlpn@gmail.com)

Subject: Fox v. Laurain - Campaign Finance Complaint



Fox v. Laurain -
Campaign Fina...

Fracassi, Adam (MDOS)

From: Fracassi, Adam (MDOS)
Sent: Thursday, September 19, 2019 1:11 PM
To: emfox2020@gmail.com
Subject: Fox v. Laurain - Campaign Finance Complaint
Attachments: Complaint Guidebook & Procedures.pdf; Notice of Complaint.pdf

Ms. Fox,

Please find attached correspondence related to your campaign finance complaint filed against Robin Laurain. I am also including a copy of the Department's guidebook on the investigative process. If you have any questions, please let me know.

Adam Fracassi
Bureau of Elections

Fracassi, Adam (MDOS)

From: Microsoft Outlook
To: emfox2020@gmail.com
Sent: Thursday, September 19, 2019 1:11 PM
Subject: Relayed: Fox v. Laurain - Campaign Finance Complaint

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

emfox2020@gmail.com (emfox2020@gmail.com)

Subject: Fox v. Laurain - Campaign Finance Complaint



Fox v. Laurain -
Campaign Fina...

Fracassi, Adam (MDOS)

From: Robin Laurain <robinlaurainlpn@gmail.com>
Sent: Tuesday, September 24, 2019 11:27 AM
To: Fracassi, Adam (MDOS)
Subject: Fox vs. Laurain

Dear Mr. Fracassi:

Thank you for your time this morning answering my questions.

As I told you in our conversation, I did enter into a contract with Erin Fox. I terminated the contract early after I found out he owned my domain robinlaurain.com and deleted my Nationbuilder. I made a complaint against Mr. Fox with the Green Party of Michigan about his taking my site down. After investigation by the Communications Director, she found he had ownership of my property. I terminated my relationship with him and offered to pay him 400.00.

I did not file this as part of my campaign reporting because I did not know I had to. I would be willing to do so if it needed to be done.

I have the waiver and did not realize this was considered a campaign expense.

I also learned that I can ask the court to set aside this judgement and am going to investigate further as to how to do this.

Please advise.

Robin Laurain

Fracassi, Adam (MDOS)

From: Fracassi, Adam (MDOS)
Sent: Thursday, October 3, 2019 3:28 PM
To: robinlaurainlpn@gmail.com
Subject: Fox v. Laurain - CFC
Attachments: Answer.pdf; Answer Letter.pdf

Please find attached correspondence related to the campaign finance complaint filed against you. If you have any questions, please let me know.

Adam Fracassi
Bureau of Elections

Fracassi, Adam (MDOS)

From: Fracassi, Adam (MDOS)
Sent: Thursday, October 3, 2019 3:27 PM
To: emfox2020@gmail.com
Subject: Fox v. Laurain - Answer received
Attachments: Answer.pdf; Answer Letter.pdf

Mr. Fox,

Please see the attached answer from Ms. Laurain regarding your complaint. If you have any questions, please let me know.

Adam Fracassi
Election Law Specialist
Bureau of Elections
Michigan Department of State
430 West Allegan Street
Lansing, Michigan 48918
(517) 335-3234



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

October 3, 2019

Erin Fox
2122 Mary Avenue
Lansing, Michigan 48910

Via Email

Dear Mr. Fox:

The Department of State received a response to the complaint you filed against Robin Laurain, 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,

/s/ Adam Fracassi

Adam Fracassi
Bureau of Elections
Michigan Department of State

c: Robin Laurain, via email

Mr. Fox,

The Department acknowledges your request for an extension of time to file a rebuttal to the campaign finance complaint you filed against Robin Laurain. The Department understands that additional time is needed since you did not see the emails until today. The Department therefore finds there is good cause to grant a 15-business day extension pursuant to MCL 169.215(5). Please note that the original due date was October 17, 2019. The new deadline for your rebuttal is October 31, 2019.

If you have any questions, please let me know. I'll also place a hard copy of the answer in today's mail and am attaching a copy of it to this email.

Adam Fracassi, Election Law Specialist

Michigan Bureau of Elections

P.O. Box 20126

Lansing, Michigan 48901

From: Erin Fox <emfox2020@gmail.com>

Sent: Tuesday, October 22, 2019 4:07 PM

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

Subject: Re: Fox v. Laurain - Campaign Finance Complaint

Mr Fracassi,

Thank you for sending this communication. This is the first I have seen emails regarding the matter. I respectfully request an extension on the rebuttal period so I may respond to Ms. Laurain's answer.

Erin M Fox

Lansing, MI

On Thu, Sep 19, 2019 at 1:10 PM Fracassi, Adam (MDOS) <FracassiA@michigan.gov> wrote:

Ms. Fox,

Please find attached correspondence related to your campaign finance complaint filed against Robin Laurain. I am also including a copy of the Department's guidebook on the investigative process. If you have any questions, please let me know.

Adam Fracassi

Bureau of Elections

Fracassi, Adam (MDOS)

From: Erin Fox <emfox2020@gmail.com>
Sent: Tuesday, October 22, 2019 5:50 PM
To: Fracassi, Adam (MDOS)
Subject: Re: Fox v. Laurain - Campaign Finance Complaint

Mr. Adam Fracassi

Michigan Department of State

Michigan Bureau of Elections

P.O. Box 20126

Lansing, Michigan 48901

October 22, 2019

Dear Mr. Fracassi,

I am writing you today in rebuttal to the response of ROBIN LEA LAURAIN regarding my campaign finance violation complaint against her.

Whereas ROBIN LEA LAURAIN hired my company D/B/A GREAT LAKES CAMPAIGNS in April of 2018 as Campaign Manager and consultant for her campaign for State Representative in the 68th District, with an election date of November 6, 2018, a debt was incurred for campaign management services for which no payment has ever been made.

ROBIN LEA LAURAIN entered into a formal contract with my company Great Lakes Campaigns in May of 2018.

With my assistance, ROBIN LEA LAURAIN secured the nomination of the Green Party of Michigan for the office she was seeking. Later in May of 2018, ROBIN LEA LAURAIN violated the terms of our agreement, breaching contract by failing to pay on time.

In October 2018, a judgment was entered against ROBIN LEA LAURAIN in 66th Judicial Court in Shiawassee County in the amount of \$3,449.32.

ROBIN LEA LAURAIN acknowledged that she was notified of this debt in electronic correspondence to the State Central Committee of the Green Party of Michigan that same month.

Complainant asserts ROBIN LEA LAURAIN had full knowledge of the campaign debt before post-General reporting in 2018.

ROBIN LEA LAURAIN understood that her campaign had incurred a debt. It would stand to reason that if ROBIN LEA LAURAIN was acting in good faith, she would expect to have to raise or spend money to pay that debt, and would be thus, over the \$1000 reporting waiver limit. This is prior to judgment. Post judgment, it is even clearer that ROBIN LEA LAURAIN would be responsible for paying the campaign debt according to the contract and the judgment. Instead, ROBIN LEA LAURAIN has constructed a false and ever-changing story to obfuscate the actual debt, in hopes of avoiding both payment of the debt and truthful campaign finance reporting.

It is pertinent to note that while ROBIN LEA LAURAIN remains in contempt regarding the judgment in Shiawassee County, the debt owed jointly by the campaign and ROBIN LEA LAURAIN is increasing. Statutory interest is accruing on the unpaid balance of the judgment. In May 2019, statutory interest accrued in the amount of \$66.36, bringing the total to \$3,515.68. In October of 2019, statutory interest accrued in the amount of \$56.87, bringing the total amount to \$3,572.55.

In regard to the notion of this judgment being set aside, that is not possible. The 21 day period for appeal of this case has elapsed. In addition, the respondent cannot file for relief under Rule 2.612, Relief From Judgment or Order, as the judgment was entered on October 11, 2018 and more than one year has passed since said entry.

Furthermore, the probability of future action to recover monies paid in recovery of the existing judgment is likely. Charges for process service and investigation have been incurred as a result of ROBIN LEA LAURAIN 's failure to update her current address with complainant. ROBIN LEA LAURAIN has changed her residential address on more than one occasion since filing as a candidate committee, and has been difficult to locate/serve via civil process. She has stated on multiple occasions, including published statements that she intends to avoid paying the judgment. I hereby submit that ROBIN LEA LAURAIN is acting in bad faith in her rebuttal and attempting to defraud the State of Michigan by making false and misleading statements to you during this course of investigation.

Therefore, I present this rebuttal as evidence of the existence of the debt, the respondent's knowledge of the debt in May of 2018, the respondent's failure to maintain a current address with the Bureau of Elections and the respondent's attempt to conceal the debt and defraud the State of Michigan under false pretenses.

Respectfully Submitted,

Mr. Erin M Fox

Owner

Great Lakes Campaigns

On Tue, Oct 22, 2019 at 4:27 PM Fracassi, Adam (MDOS) <FracassiA@michigan.gov> wrote:

Fracassi, Adam (MDOS)

From: Fracassi, Adam (MDOS)
Sent: Friday, October 25, 2019 2:56 PM
To: Robin Laurain
Subject: Fox v. Laurain - Rebuttal Received
Attachments: Rebuttal Letter.pdf; Rebuttal.pdf

Ms. Laurain,

Please see attached correspondence from the Department regarding the campaign finance complaint filed.

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

Fracassi, Adam (MDOS)

From: Fracassi, Adam (MDOS)
Sent: Friday, October 25, 2019 2:57 PM
To: Erin Fox
Subject: Fox v. Laurain - Rebuttal Received
Attachments: Rebuttal Letter.pdf; Rebuttal.pdf

Mr. Fox,

Please see attached correspondence regarding the campaign finance complaint filed with the Department.

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



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

October 25, 2019

Robin Lea Laurain
1436 Massachusetts Avenue
Lansing, Michigan 48906

Re: *Fox v. Laurain*
Campaign Finance Complaint
No. 2019-09-30-33

Dear Ms. Laurain:

This letter concerns the complaint that was recently filed against you, which relates to a purported violation of the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.201 *et seq.* The Department of State has received a rebuttal statement from the complainant, a copy of which is enclosed with this letter.

Section 15(10) of the MCFA, MCL 169.215(10), requires the Department to determine within 45 business days from the receipt of the rebuttal statement whether there is a reason to believe that a violation of the Act has occurred. The complaint remains under investigation at this time.

If the Department needs more information, you may be contacted. The complaint will remain under investigation until a final determination has been made. At the conclusion of the review, all parties will receive written notice of the outcome of the complaint.

Sincerely,

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

Adam Fracassi
Bureau of Elections
Michigan Department of State

c: Erin Fox

Fracassi, Adam (MDOS)

From: Robin Laurain <robinlaurainlpn@gmail.com>
Sent: Saturday, October 26, 2019 10:26 AM
To: Fracassi, Adam (MDOS)
Cc: Erin Committee; D'Etta Wilcoxon; LuAnne Kozma; Lou Novak; Daniel Martin-Mills; Amanda Slepr; John Anthony La Pietra (AT&T); Andrea Merida
Subject: Re: Fox v. Laurain - Rebuttal Received

Dear Mr. Fracassi:

My story has not changed and remains the same.

In this latest email, Mr. Fox claims that now both myself and my campaign owes this money. At one point he said it was 1600.00 and now he has added even more money. According to Fox, who owes him this money changes. First he told me it was myself, he next said my campaign, and now he is saying both.

I am taking this matter to district court which operates by different standards than small claims court.

I spoke with the Clerk in Shiawassee County and she did not have Mr. Fox's new address on file. I gave her mine.

My address is registered with the Secretary of State and the Michigan Green Party. Mr. Fox also has my email since we serve on Green Party committees together and I am also on Google and social media. I am not an invisible person.

I am a travel nurse so my address does change about every 13 weeks which is the length of a typical contract. My permanent address is registered with the Secretary of State.

I believe I owe Mr. Fox 400.00. Mr. Fox has never produced an itemized invoice for myself or small claims court. The amount he feels I owe him changes frequently.

I have offered to pay him 400.00 several times.

If it is a campaign law violation because I did not file this 400.00 debt that I feel I owe him, (not my campaign), I am asking if I may be allowed to file at this time. I am not going to file any other amount since I do not feel I owe it.

If there is a 1,000 fine, I am asking if I could make a payment plan. I am presently under working due to an illness and is one of the reasons I did not go further in my request to start a new campaign committee. If you note, I started the process.

I would like to resolve this matter so that I can move on with my life and so that the tension that this matter has caused within the Green Party has a chance to die down. We have an election to get ready for and this matter is causing people to focus on the wrong things.

I also apologize to the bureau for this and am willing to take responsibility for not knowing I had to file this if it is determined that I had to do so in the first place. Please advise.

I also am cc ing this email to our party officers so that they are aware that I am trying to cooperate with the bureau and resolve this issue.

Robin Laurain

On Fri, Oct 25, 2019, 2:55 PM Fracassi, Adam (MDOS) <FracassiA@michigan.gov> wrote:

Ms. Laurain,

Please see attached correspondence from the Department regarding the campaign finance complaint filed.

Adam Fracassi, Election Law Specialist

Michigan Bureau of Elections

P.O. Box 20126

Lansing, Michigan 48901



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

January 2, 2020

Robin Lea Laurain
1436 Massachusetts Avenue
Lansing, Michigan 48906

Re: *Fox v. Laurain*
Campaign Finance Complaint
No. 2019-09-30-33

Dear Ms. Laurain:

The Department of State (Department) has concluded its investigation into the formal complaint filed against you by Erin Fox alleging violations of the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.201 *et seq.* This letter concerns the disposition of the complaint.

Mr. Fox filed his complaint with the Department on September 12, 2019 and alleged that you failed to accurately file campaign finance statements. Specifically, Mr. Fox alleged that you failed to disclose an expenditure for a consulting contract in the amount of \$1,600 and a judgment issued against you. Submitted with the complaint was a copy of the consulting contract and the Register of Actions for the Shiawassee County 66th District Court.

By email dated September 24, 2019, you responded to the complaint and indicated that you had a reporting waiver and did not realize that this was all considered a campaign expense.

By email dated October 22, 2019, Mr. Fox submitted his rebuttal statement to the Department. He argued that you were notified of the debt prior to reporting by signing the contract, you exceeded the \$1,000 reporting waiver threshold.

The MCFA 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).

The Department has reviewed the documents submitted with this complaint and has reviewed your committee page filed with the Department.¹ Based upon this, the Department finds that the evidence is sufficient to determine that a potential violation of the Act has occurred.

The MCFA allows committees to be placed on a reporting waiver if the committee does not expect to spend or receive more than \$1,000 per election. MCL 169.224(5). This statement is made in conjunction with the filing of the Statement of Organization. Here, your statement of organization was filed with the Department on May 3, 2018 and the waiver was granted on May 5, 2018. The same day you filed the statement of organization with the Department, you signed a contract with Mr. Fox for consulting totaling \$1,600. At the time of signing, you became ineligible for the reporting waiver, because you expected to spend more than \$1,000 for the election.

Therefore, the Department concludes that a potential violation of the Act has occurred. Upon reaching this conclusion, the Department is required 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.*

In order to resolve this complaint, the Department first requests that you file all outstanding amended reports from May 3, 2018 to present, as necessary, to include all campaign contributions and expenditures that have been received or paid. You may contact the Filings, Disclosure and Compliance Division to speak with the appropriate analyst at 517-335-0170 if you need assistance and for assistance in determining what reports are due.

The outstanding reports should be filed by January 23, 2020. Should you need additional time and are working with the Department to come into compliance, this deadline may be adjusted. Upon receipt of all filed reports, the Department will review to determine if further enforcement action is necessary, and what fines or late filing fees, if any, are deemed appropriate.

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

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: Amy Lovegrove, BOE

¹ Available at <https://cfrsearch.nictusa.com/committees/518965>



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

July 19, 2022

Robin Lea Laurain
1436 Massachusetts Avenue
Lansing, MI 48906

Via Email

Re: *Fox v. Laurain*
Campaign Finance Complain No. 2019-09-30-33

Dear Ms. Laurain:

This letter concerns the campaign finance complaint filed against you by Erin Fox, which alleged certain violations of the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.201 *et seq.*

In her complaint, Ms. Fox alleged that you failed to accurately file campaign finance statements. Specifically, Ms. Fox alleged that you failed to disclose an expenditure for a consulting contract and judgment issued against you totaling \$3,449.32.

By letter dated January 2, 2020, the Department found that the evidence provided supported a reason to believe that a violation had occurred. As previously indicated, upon reaching this conclusion, the Department is required 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.*

As part of the informal resolution, the Department asked you to file all outstanding amended reports from May 3, 2018 to present, as necessary, to include all campaign contributions and expenditures that have been received or paid.

The Department has reviewed your response to this request and is satisfied that you attempted to comply with the Department's request to the best of your ability, but that for reasons outside of your control you were unable to file all of the requested amended reports. Therefore, the Department determines that this formal warning is a sufficient resolution to the complaint. The Department now considers this matter closed and will take no further action against you at this time.

Please be advised that this notice has served to remind you of your obligation under the Act to disclose contributions and expenditures, and may be used in future proceedings as evidence that tends to establish a knowing violation of the Act.

Sincerely,

Bureau of Elections
Michigan Department of State

c: Erin Fox