



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
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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 Cody A. Mott		Daytime Telephone Number 616-644-5596
Mailing Address 1874 Leffingwell Ave. NE,		
City Grand Rapids	State MI	Zip 49525
Email (optional) codyamott@gmail.com		

Section 2. Alleged Violator		
Name AJ Hoff for Kent County Commission		
Mailing Address 4732 Hidden Highland Dr. NE		
City Rockford	State MI	Zip 49341
Email (optional)		

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

Section(s) of the MCFA alleged to be violated: MCL 169.247(1).

Explain how those sections were violated:

Section 47 of the MCFA states that a "placard, poster, pamphlet, or other printed matter having reference to an election, [or] a candidate . . . shall bear upon it an identification that contains the *name and address* of the person paying for the matter." MCL 169.247(1) (emphasis added). The Bureau of Elections, in its Candidate Manual, has applied this identification requirement to paid electronic media, such as a candidate's website. *See* Committee Manual, Appendix J. Candidate AJ Hoff has been distributing printed placards that do not include an address or other contact information in violation of Section 47. Likewise, his website does not include either the "paid for" statement or an address. Each of these are a violation of the MCFA.

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

See attached placard. Website is available at <https://ajhoff4kent.com/>.

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

06/25/2022

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

Elect

★ **A.J.
HOFF**

KENT COUNTY COMMISSIONER

Patriot For the People

11th District



Yes! I've signed the contract!
kentcontract.com

Paid for by the committee to elect AJ Hoff

A Grassroots Republican

Constitutionalist | Christian | Husband | Father
Plainfield Township resident for 9 years

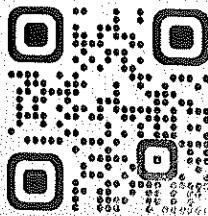
Supports:

- Pro Life
- Constitution First
- Protecting Local Farmers
- Medical Choice
- 1st, 2nd, 4th Amendment Rights
- Strong Local Economies
- Funding for Our Sheriff

Opposes:

- Vaccine/Mask/Medical Mandates
- Illegal Immigration
- Critical Race Theory
- Excessive Spending
- Government Overreach

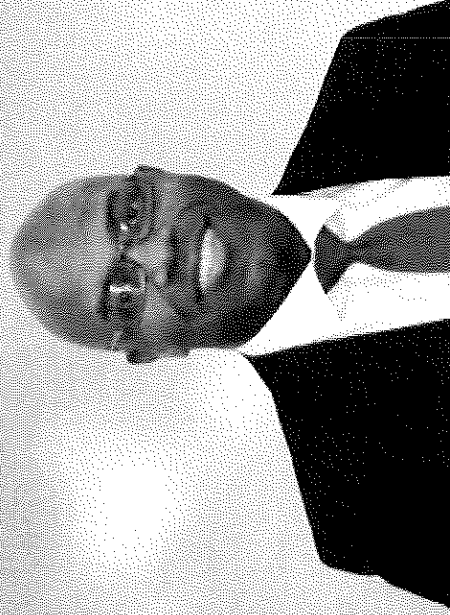
*Scan to get to know
a little bit more about AJ...*



**Vote in the
Republican Primary August 2, 2022**
ajhoff4kent@gmail.com | ajhoff4kent.com



AJ Hoff for Kent County Commissioner



AJ Hoff for Kent County Commission District 11

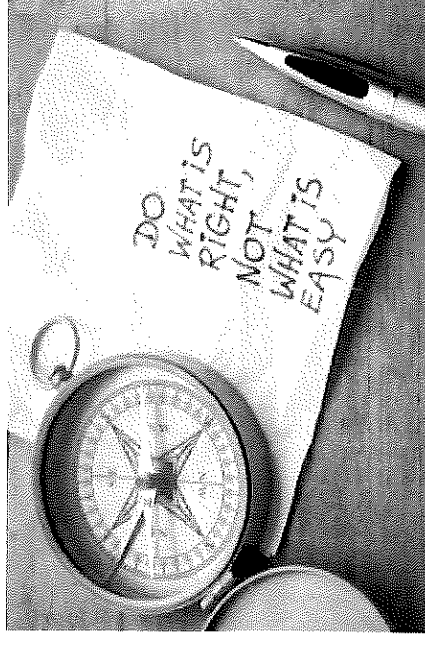


It's just politics as usual, right? Wrong.

We cannot allow politics as usual. This will lead us into further turmoil. It is time to elect new leaders - people with conviction who can rise above the moral destitution of our culture.

AJ Hoff is running for Kent County Commissioner in District 11. District 11 includes Grand Rapids Township and the eastern part of Plainfield Township.

Born and raised in Washington D.C., AJ moved to Kent County nine years ago to seek a political culture where leadership valued its residents. After the events of the last two years, AJ realized that the lack of trustworthy representation is more widespread than ever. He decided to take action. AJ believes we need real community leaders who are led by conviction and will honor the Constitution. He plans to bring "by the people, for the people" back to local government. AJ is a man of conviction who will do what is right and will serve the people of District 11 with integrity.



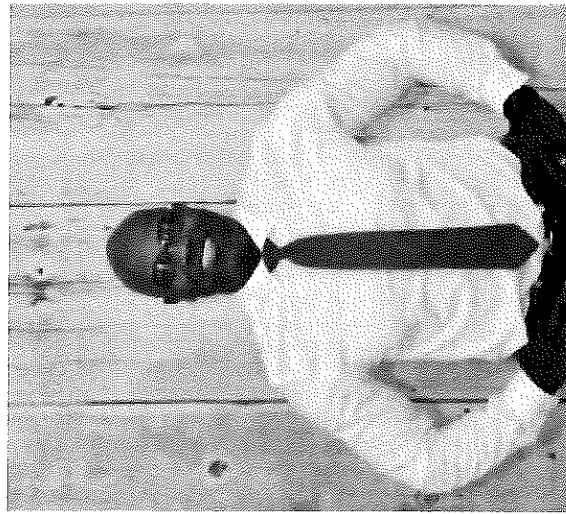


I am a husband, father to 5 amazing daughters, a son, a brother, and an American. I believe that government is still for the people and by the people.

I was born in Washington DC but spent many of my professional years in New York, Boston, and Southern Africa.. My great uncle served as President of Liberia, and my West African parents came to the U.S. to pursue the American Dream.

I am running for county commissioner because I feel that government has gotten away from the people it was created by and for. I'm running to better the future for my daughters and for their children. The American people of District 11 deserve to be listened to. They deserve to feel free from government over reach. We don't need the government telling us what vaccines to get or how to best keep our children healthy. As an American, I feel that government should represent the people and not corporations. I am running for county commissioner to empower everyday Americans. We must stand up against leaders who are simply in government for themselves.

I would like to talk with you and answer questions you may have. You can contact me at ajhoff4kent@gmail.com or fill out the form. I look forward to meeting and serving the great residents in District 11.



Your Name	<input type="text"/>
Your Email	<input type="text"/>
Message	<input type="text"/>
<input type="button" value="Submit"/>	



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

July 22, 2022

Via Mail and Email at ajhoff4kent@gmail.com

A. J. Hoff for County Commissioner
4732 Hidden Highland Drive, NE
Rockford, MI 49341

Re: *Mott v. A. J. Hoff for Kent County Commissioner*
Campaign Finance Complaint No. 2022-07-41-247

Dear Sir/Madam:

The Department of State (Department) has received a formal complaint alleging you have violated MCL 169.247 of the Michigan Campaign Finance Act (MCFA) by failing to include committee information on campaign placards and your website; a copy of the complaint is enclosed.

The MCFA and corresponding administrative rules require a person who produces printed material that relates to an election include the phrase "Paid for by [name and address of the person who paid for the matter]." 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 a potential violation of the MCFA has occurred.

After reaching this conclusion, the Act requires the Department to "endeavor to correct the violation or prevent a further violation by using informal methods" if it finds that "there may be reason to believe that a violation ... has occurred [.]". MCL 169.215(10). The objective of an informal resolution is "to correct the violation or prevent a further violation." *Id.*

Given this, the Department concludes that a formal warning is a sufficient resolution to the complaint and is hereby advising you that MCL 169.247(1) and R 169.36(2) require you to print a complete and accurate identification statement on all campaign materials, consisting of the phrase "paid for by" followed by the full name and address of your committee.

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. If this information has been included in your materials and you wish to rebut the Department's conclusion, you must respond in writing to the Department within 15 business days of the date of this letter otherwise the Department will treat the complaint as resolved.

Please be advised that this notice has served to remind you of your obligation under the Act to identify your printed matter and may be used in future proceedings as evidence that tends to establish a knowing violation of the Act. A knowing violation is a misdemeanor offense and may merit referral to the Attorney General for enforcement action. MCL 169.247(6), 215(10).

Sincerely,

Regulatory Section
Bureau of Elections
Michigan Department of State

Attachment

c: Cody A. Mott - Via Email at codymott@gmail.com