

Michigan Department of State Campaign Finance Complaint Form

Campaign Finance Complaint Form BUREAU OF ELECTIONS • RICHARD H. AUSTIN BUILDING - 1" FLOOT 430 W. ALLEGAN STREET • LANSING, MICHIGAN 48918

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

Section 1. Complainant Your Name Donald Munski		Daytime Telephone Number 231-720-5941
Mailing Address 1078 Brookway Court		
City Norton Shores	State MI	Zip 49441
Email (optional) donaldmunski@yahoo.com		1.

Section 2. Alleged Violator		<u> </u>	
Zachary T. Lahring			
Mailing Address			
9770 Judson			
City	State	Zip	
Ravenna	MI	49451	
Email (optional)		······	
ahringza@co.muskegon.mi.us			

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

Section(s) of the MCFA alleged to be violated: Section 169.252(c), and 169.243 Explain how those sections were violated:

ALLEDGED VIOLATION #1

Section 169.252(c) limits the dollar value of contributions that can be accepted by a candidates committee. Section 169.252 (c) states; "\$1,000.00 for a candidate for state representative, or for a candidate for local elective office if the district from which he or she is seeking office has a population of 85,000 or less." (Exhibit 1) According to the Muskegon County Apportionment Committee report the population for District 5 in 2010 was 16,197. (Exhibit 2) As the population of the district was 85,000 or less, the candidate is limited to accepting donations of \$1,000.00 or less.

The candidate's committee accepted two contributions from individuals in excess of campaign finance limits. (Exhibit 3) They accepted the following donations that exceeded the legal limit:

Emily Macniela, donated \$2,100 on, or about 9/5/2020. Ryan Leestma donated \$2,100 on, or about, 9/5/2020

ALLEDGED VIOLATION #2

169.243 Expenditure by agent or independent contractor; requirements; violation; penalty. "Sec. 43. An expenditure shall not be made, other than for overhead or normal operating expenses, by an agent or an independent contractor, including an advertising agency, on behalf of or for the benefit of a person unless the expenditure is reported by the committee as if the expenditure were made directly by the committee, or unless the agent or independent contractor files a report of an independent expenditure as provided in section 51. The agent or independent contractor shall make known to the committee all information required to be reported by the committee. A person who knowingly is in violation of this subsection is guilty of a misdemeanor and shall be punished by a fine of not more than \$1,000.00, or imprisoned for not more than 90 days, or both, and if the person is other than an individual the person shall be fined not more than \$10,000.00." (Exhibit 4)

The Candidate's Committee reported an expenditure to Right Strategies LLC for the purpose of Advertising on 11-16-2020, in the amount of \$4,230.73. (Exhibit 5) The Committee failed to provide the details for the expenditure as required by statute. The statute requires details "as if the expenditure were made directly by the committee, or unless the agent or independent contractor files a report of an independent expenditure as provided by section 51."

The Michigan Department of State provided an example of how to meet this discloure required in the MCFA/MERTS Candidate Training on 6/16/21. (Exhibit 6)

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

EXHIBIT 1 - MCFA: Section 169.252

EXHIBIT 2 - Populations of Commissioner Districts 2010 Census Population Data

EXHIBIT 3 - Candidates Campaign Report for the period 8-25-2020 to10-18-2020, filed with

Muskegon County Clerk on Oct. 23, 2020.

EXHIBIT 4 – MCFA: Section 169.243

EXHIBIT 5 – Candidates Campaign Report for the period 10-19-2020 to 11-23-2020, filed with Muskegon County Clerk on Dec. 2, 2020

EXHIBIT 6 - Example of reporting expenditures made on behalf of the campaign by an agent, or independent contractor.

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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.

Х ignature of Complainant Certification without Evidence (Supplemental to Section 4)

If, after a reasonable inquiry under the circumstances, you are unable to certify that certain factual contentions are supported by evidence as indicated above, you may make the following certification:

I certify that to the best of my knowledge, information, or belief, there are grounds to conclude that the following specifically identified factual contentions are likely to be supported by evidence after a reasonable opportunity for further inquiry. Those specific contentions are:

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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

EXHIBIT 1

MICHIGAN DEPARTMENT OF STATE CAMPAIGN FINANCE COMPLAINT FORM

Complainant: Donald Munski Alleged Violator: Zachary T. Lahring

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MICHIGAN CAMPAIGN FINANCE ACT (EXCERPT) Act 388 of 1976

169.252 Limitations on contributions to candidate committee; contribution from candidate's immediate family; contribution for particular election cycle; violation as misdemeanor; penalty; contributions made by political or independent committees established by corporation, joint stock company, domestic dependent sovereign, or labor organization; bundled contributions.

Sec. 52. (1) Except as provided in subsection (5) or (11) and subject to section 46 and subsection (8), a person other than an independent committee or a political party committee shall not make contributions to a candidate committee of a candidate for elective office that, with respect to an election cycle, are more than the following:

(a) \$6,800.00 for a candidate for state elective office other than the office of state legislator, or for a candidate for local elective office if the district from which he or she is seeking office has a population of more than 250,000.

(b) \$2,000.00 for a candidate for state senator, or for a candidate for local elective office if the district from which he or she is seeking office has a population of more than 85,000 but 250,000 or less.

(c) \$1,000.00 for a candidate for state representative, or for a candidate for local elective office if the district from which he or she is seeking office has a population of 85,000 or less.

(2) Except as otherwise provided in this subsection and subsection (12), an independent committee shall not make contributions to a candidate committee of a candidate for elective office that, in the aggregate for that election cycle, are more than 10 times the amount permitted a person other than an independent committee or political party committee in subsection (1). A house political party caucus committee or a senate political party caucus committee is not limited under this subsection in the amount of contributions made to the candidate committee of a candidate for the office of state legislator, except as follows:

(a) A house political party caucus committee or a senate political party caucus committee shall not pay a debt incurred by a candidate if that debt was incurred while the candidate was seeking nomination at a primary election and the candidate was opposed at that primary.

(b) A house political party caucus committee or a senate political party caucus committee shall not make a contribution to or make an expenditure on behalf of a candidate if that candidate is seeking nomination at a primary election and the candidate is opposed at that primary.

(3) A political party committee other than a state central committee shall not make contributions to the candidate committee of a candidate for elective office that are more than 10 times the amount permitted a person other than an independent committee or political party committee in subsection (1).

(4) A state central committee of a political party shall not make contributions to the candidate committee of a candidate for state elective office other than a candidate for the legislature that are more than 20 times the amount permitted a person other than an independent committee or political party committee in subsection (1). A state central committee of a political party shall not make contributions to the candidate committee of a candidate for state senator, state representative, or local elective office that are more than 10 times the amount permitted a person other than an independent committee or political party committee in subsection (1).

(5) A contribution from a member of a candidate's immediate family to the candidate committee of that candidate is exempt from the limitations of subsection (1).

(6) Consistent with the provisions of this section, a contribution designated in writing for a particular election cycle is considered made for that election cycle. A contribution made after the close of a particular election cycle and designated in writing for that election cycle shall be made only to the extent that the contribution does not exceed the candidate committee's net outstanding debts and obligations from the election cycle so designated. If a contribution is not designated in writing for a particular election cycle, all of the following apply to that contribution:

(a) The contribution is considered made for the election cycle that corresponds to the date of the written instrument.

(b) The contribution limits for the current election cycle apply to that contribution.

(c) A candidate committee may use that contribution to pay outstanding debts and obligations from a previous election cycle regardless of whether the contribution, when aggregated with any contributions made in that previous election cycle, would exceed the contribution limits for that previous election cycle.

(7) A candidate committee, a candidate, or a treasurer or agent of a candidate committee shall not accept a contribution with respect to an election cycle that exceeds the limitations in subsection (1), (2), (3), (4), (11), or (12).

(8) The contribution limits in subsection (1) for a candidate for local elective office are effective on the Rendered Wednesday, December 29, 2021
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 Michigan Compiled Laws Complete Through PA 131 of 2021
 Courtesy of www.legislature.mi.gov

effective date of the amendatory act that provides for those contribution limits, however, only contributions received by that candidate on and after that date shall be used to determine if the contribution limit has been reached.

(9) A person who knowingly violates this section is guilty of a misdemeanor punishable, if the person is an individual, by a fine of not more than \$1,000.00 or imprisonment for not more than 90 days, or both, or, if the person is not an individual, by a fine of not more than \$10,000.00.

(10) For purposes of the limitations provided in subsections (1) and (2), all contributions made by political committees or independent committees established by any corporation, joint stock company, domestic dependent sovereign, or labor organization, including any parent, subsidiary, branch, division, department, or local unit thereof, shall be considered to have been made by a single independent committee. By way of illustration and not limitation, all of the following apply as a result of the application of this requirement:

(a) All of the political committees and independent committees established by a for profit corporation or joint stock company, by a subsidiary of the for profit corporation or joint stock company, or by any combination thereof, are treated as a single independent committee.

(b) All of the political committees and independent committees established by a single national or international labor organization, by a labor organization of that national or international labor organization, by a local labor organization of that national or international labor organization, or by any other subordinate organization of that national or international labor organization, or by any combination thereof, are treated as a single independent committee.

(c) All of the political committees and independent committees established by an organization of national or international unions, by a state central body of that organization, by a local central body of that organization, or by any combination thereof, are treated as a single independent committee.

(d) All of the political committees and independent committees established by a nonprofit corporation, by a related state entity of that nonprofit corporation, by a related local entity of that nonprofit corporation, or by any combination thereof, are treated as a single independent committee.

(11) The limitation on a political committee's contributions under subsection (1) does not apply to contributions that are part of 1 or more bundled contributions delivered to the candidate committee of a candidate for statewide elective office and that are attributed to the political committee as prescribed in section 31. A political committee shall not make contributions to a candidate committee of a candidate for statewide elective office that are part of 1 or more bundled contributions delivered to that candidate committee, that are attributed to the political committee as prescribed in section 31, and that, in the aggregate for that election cycle, are more than the amount permitted a person other than an independent committee or political party committee in subsection (1).

(12) The limitation on an independent committee's contributions under subsection (2) does not apply to contributions that are part of 1 or more bundled contributions delivered to the candidate committee of a candidate for statewide elective office and that are attributed to the independent committee as prescribed in section 31. An independent committee shall not make contributions to a candidate committee of a candidate for statewide elective office that are part of 1 or more bundled contributions delivered to that candidate committee, that are attributed to the independent committee as prescribed in section 31, and that, in the aggregate for that election cycle, are more than 10 times the amount permitted a person other than an independent committee or political party committee in subsection (1).

History: 1976, Act 388, Eff. June 1, 1977;---Am. 1978, Act 349, Ind. Eff. July 12, 1978;---Am. 1989, Act 95, Imd. Eff. June 21, 1989;--Am. 1994, Act 117, Eff. Apr. 1, 1995;--Am. 1995, Act 264, Eff. Mar. 28, 1996;--Am. 1996, Act 590, Eff. Mar. 31, 1997;--Am. 2001, Act 250, Eff. Mar. 22, 2002;---Am. 2013, Act 252, Ind. Eff. Dec. 27, 2013;---Am, 2015, Act 269, Imd. Eff. Jan. 6, 2016.

Compiler's note: Section 2 of Act 264 of 1995 provides:

"If any portion of this amendatory act or the application of this amendatory act to any person or circumstance is found to be invalid by a court, the invalidity does not affect the remaining portions or applications of this amendatory act that can be given effect without the invalid portion or application, if those remaining portions are not determined by the court to be inoperable. To this end, this amendatory act is declared to be severable.'

EXHIBIT 2

MICHIGAN DEPARTMENT OF STATE CAMPAIGN FINANCE COMPLAINT FORM

Complainant: Donald Munski Alleged Violator: Zachary T. Lahring

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	Census Population
ortionment	cts With 2010 C
gon County App	missioner Districts
Muskeg	2000-2010 Com
	Plan Name: 20

lispanic %	4	4.89	3.4	4.67	9.37	6.39	6.36	2.61	m	
Hispanic Population H	819	1,035	654	797	1,516	928	1,164	538	629	8080
Mand %	0	0,03	0.02	0.03	0.02	0	0.02	0.01	0.02	
Island Population	0	9	m	ы	4	0	m	m	4	82
Asian %	0.58	0.32	1.17	۲đ	0.46	0.14	4.0	0.47	4.0	
~ 8	118	67	225	171	5	20	74	26	83	930
n Native n American % P	0.48	1.03	0.55	1.07	0.99	0.56	0.9	0.75	1.04	
Native American Population	65	219	106	183	161	81	165	53	217	1386
Black %	0.88	2.35	3.02	6.58	40.93	70.67	16.44	2.33	1.15	
Black Population	180	497	582	1,124	6,625	10,263	3,011	481	240	23003
White %	95.1	92.15	92.38	87.48	48.61	22.27	76.38	93.84	94.64	
White Population	19,466	19,514	17,795	14,933	7,868	3,234	13,987	19,336	19,829	135962
Population Deviation %	9.3	13.07	2.85	8.85	-13.57	-22.46	-2.23	10.02	11,86	
Population Deviation from Target	1,741	2,447	534	-1,659	-2,542	-4,206	417	1,876	2,222	
Population Total	20,470	21,176	19,263	17,070	16,187	14,523	18,312	20,605	20,951	168557 9 18,729
District	10	D2	D3	40	05	8	70	8	60	ls cts oulation
Q	District 1	District 2	District 3	District 4	District 2	District 6	District 7	District 8	District 9	Totals Districts Target Population

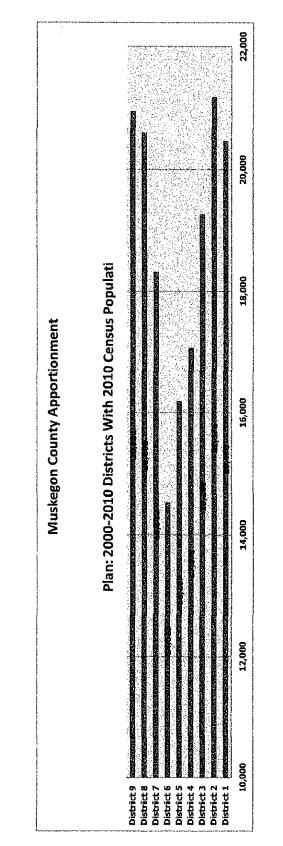


EXHIBIT 3

MICHIGAN DEPARTMENT OF STATE CAMPAIGN FINANCE COMPLAINT FORM

Complainant: Donald Munski Alleged Violator: Zachary T. Lahring

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MICHIGAN DEPARTMENT OF STAT	Ē	NANCÝ MUSKEGO	A. WATERS
CANDIDATE COMMITTE COVER PAGE	E		FOR OFFICIAL USE ONLY
Report must be legible, typed or printed in ink and the treasurer (or designated record keeper) and ca	signed by ndidate.	3. This Statement covers From:	8-25-2020. 10-18-2020
1. Committee I.D. Number	<u> </u>	4. Candidate Last Name	First Name M.I.
83972		L-ONY INY	rict # or Community Served (if applicable)
2. Committee Name Committee to Elect			missioner District 5
Zach Lahring		4b. County of Residence	us Kegon
5. Committee's Mailing Address	Coldt	6. Treasurer's Name & Resider	
Spoelman, Hoving, + 1	reki	H203 Pontal	
719 W Randall	REAM	4700 FUINT	1. 1104185
COOPERS VINE, MIL 4 Area Code and Phone <u>Collo - 8.37 - 810</u> If the address in this box is different from the commit	4	Fruitport, M	1 477712
if the address in this box is different from the commi- mailing address on the Statement of Organization, r be sent to this address by the filing official.	ttee nall may	Area Code & Phone	y=446-226 <u>3</u>
7. Treasurer's Business Address			s Name and Address (If the committee has a
Spoelman, Howing, + F	cidf		
719 W Randaus		N/A	
Coopersville, MI 4	9404		
Area Code, and Phone 010 - 837 - 81	04	Area Code and Phone	9e. Dissolution of Candidate Committee
9. TYPE OF STATEMENT		NLY If candidate	By checking this item I/We certify any outstanding deb
9a. Re-Election OR 9b. Post-Election	is not on the current year	e ballot for the r:	by the committee to the candidate or his or her spouse is h by discharged and forgiven, and no longer collectible from
Pre-Election or Post-Election Statement relates to:	July Quar	rterly	the committee. The committee has no oustanding assets, owes no lates fees or has any oustanding debt.
	October	Quarterly	· ·
	·		Further, if the dissolution cannot be granted, that this be considered a request for the Reporting Walver.
Convention Special	90.	uel Cintomagt (
		ial Statement () Coverage Year	Effective date of dissolution
Caucus	(Con	ndment to Campaign Statement nplete Item 9a, 9b, 9c or 9e to	Note: The disposition of residual funds must be reported o
	indic	ale which Statement is being inded.)	Schedule 1B and the Summary Page.
Date of Election, Convention or Caucus			
, · ·			
10. Verification: I/We certify that all reasonable dilig my/our knowledge and belief the contents are true,	ence was use accurate and	d in the preparation of this statem complete.	ent and attached schedules (if any) and to the best of
Current Treasurer or	Feldt		10-20-2020
Designated Record keeper <u>YUIIICI</u> Type or Print Name	ILUUL	Signature	Date 10:20:2020
and a prider march & march		Dr. nA	/ h/2m/200
Candidate ZOCYCXLA LONG	13	Signature	Date 10/20/202
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MICHIGAN DEPARTMENT OF STATE BUREAU OF ELECTIONS

	t, Committee I.D. Number 83977	
SUMMARY PAGE CANDIDATE COMMITTEE	2. Committee Name COMMITTEE TO	
RECEIPTS	Column I This Period	Column'll Cumulative this election cycle
3. Contributions	0.060	
a, Itemized (Schedule 1A - Column 6)	(3a.) \$ <u>9,250</u>	
b. Unitemized (less than \$20.01 each - no Schedule)	(3b.) \$ NOT APPLICABLE	11 909
c. Subtotal of "Contributions"	(3c.) \$ <u>9,250</u>	
4. Other Receipts (Schedule 1A -1, Column 6)	(4.) \$	(19.) \$
5. TOTAL CONTRIBUTIONS AND OTHER RECEIPTS (Add Line 3c + Line 4)	(5.) \$ 9,250	(20.) \$ 11 900
IN-KIND CONTRIBUTIONS & EXPENDITURES		
6. In-Kind Contributions (Schedule 1-IK, Column 7)	(6.) \$	(21.) \$
7. In-Kind Expenditures (Schedule 1B-IK, Column 6)	(7.) \$	(22.) \$
EXPENDITURES		
8. Expenditures		
a, Itemized (Schedule 1B, Column 6)	(8a.) \$ 74(Q.70)	
b. Itemized Get-Out-the-Vote (Schedule 1B-G)	(8b.) \$ <u>2 00</u>	
c. Unitemized (less than \$50.01 each - no Schedule)	(Bc.) \$	(23) \$ 963.12
9. TOTAL EXPENDITURES (Add Line 8a + Line 8b + Line 8c)	(9.) \$ 49.10	(23.) \$
INCIDENTAL EXPENSE DISBURSEMENTS (Officeholders Only)		
10. Disbursements a. Itemized (Schedule 1C, Column 6)	(10a.) \$	
b. Uniternized (less than \$50.01 each - no Schedule)	(10b.) \$	
11. TOTAL INCIDENTAL EXPENSE DISBURSEMENTS (Add Line 10a + Line 10b)	(11.) \$	(24.) \$
DEBTS AND OBLIGATIONS 12, Debts and Obligations	•	
a. Owed by the Committee (Schedule 1E)	(12a.) \$	
b. Owed to the Committee (Schedule 1E)	(125.) \$ BALANCE STATEMENT	
 Ending Balance of last report filed (Enter zero If no previous reports have been filed.) Amount received during reporting period (Line 5, Total Contributions & Other Receipts) SUBTOTAL Add lines 13 and 14 Amount expended during reporting period (Add lines 9 and 11) ENDING BALANCE (Subtract line 16 from line 15) 	$\begin{array}{c} (13) & s \\ (14) + s \\ (14) + s \\ (15) = s \\ (15) = s \\ (16) - s \\ (16) - s \\ (17) & s \\ (17)$	•

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ITEMIZED CONTRIBUTIONS SCHEDULE 1A	H OVIIII AOD HE HINNESS	83972	Float Brick Ports
CANDIDATE COMMITTEE	2. Committee Name	ngmittee to	Elect Foch Lan
inter contributor's name and address. If contribution is from an individ- niddle initial. Check box to indicate if contribution is from a Political Co Committee (PAC) Report <u>all</u> contributions regardless of amount.	ial, enter last name, first name, mmlttee or an Independent	6. Amount	7. Cumulative for Election Cycle for Each Contributor (Through date of receipt)
A. Contribution # 1 PAC Receipt? YES 4. Date of R ame & Address: 20,071 4.201 5.016	ecelpt <u>9/4/2020</u>		
9770 JUCISON 40 ROWENNICA, MJ 19451 If over \$100.00 cumulative, please provide:		\$ 5,000	, 5, 500
n frover \$100.00 cumulative, please provide: Accupation <u>BUNDEY</u> Employer <u>Tric</u>	lom	Click Here fo	or Memo Itemization
usiness Address	Fund Raiser	II pataaaminta maraana ta ta ayaa ahaa ahaa ahaa ahaa ahaa ah	
Contribution #2 PAC Receipt? YES 4. Date of R arne & Address	ecelpt 9-5-2020		
Emily Mochiela 1599 Westwind Court	16	\$ 2,100	\$_2,100
. If over \$100.00 cumulative, please provide: Decupation Scientist Employer UNIVER	to . outre of Contrar S	Click Here fo	or Memo Itemization
Decupation <u>DURNTIST</u> Employer VINVD	JIG OL COMPONENT	机小麦品	
Business Address	Fund Raiser		
Type of Contribution: Direct Loan from a person . Contribution # 3 PAC Receipt? YES 4. Date of lame & Address:			
Ryan Leestman court	f	s 2,100	<u>\$ 2,100</u>
5. If over \$100,00 cumulative, please provide:	κ∙ \$ \$(F	Click Here fo	r Memo Iternization
Occupation Self - Employdemployer			
Business Address	Fund Ralser		
Type of Contribution: X Direct Loan from a person			
Contribution # 4 PAC Receipt? YES 4. Date of Address	f Receipt 9-1-2020) .	
A. Contribution # 4 PAC Receipt? YES 4. Date of Vame & Address GYEG RUCIEN 3986 WESTRYOOK	f Receipt 9-1-2020	\$ <u>50,00</u>	: 100. <u>**</u>
A. Contribution # 4 PAC Receipt? YES 4. Date of Vame & Address GYEG RUCIEN 3986 WESTRY 00 K	f Receipt <u>9-1-2020</u>	<u>50,00</u>	n Memo Itemization
Contribution # 4 PAC Receipt? YES 4. Date or Vame & Address GYEG RUCK 3986 WESTRYOOK MUSKEGON MI 494444 5. If over \$100.00 cumulative, please provide: Occupation MACANYLIST Employer JT Business Address	2A	<u>50,00</u>	<u>s 100.</u>
A Contribution # 4 PAC Receipt? YES 4. Date of Vame & Address GYRCA RUCLEN 3986 WESTBY 00 K MUSKERON MI 494444 5. If over \$100.00 cumulative, please provide: Occupation MACHINI ST Employer J	f Receipt <u>9-1-2020</u> RA Fund Raiser Page Subiot	s <u>50</u> , <u>50</u> Click Here fo	<u>s 100.</u>

ר ו	SCHEDULE 1A-1	Q.30	172
	CANDIDATE COMMITTEE	1. Committee I.D. Number <u>CO</u> 2. Committee Name <u>COMMITTE</u>	to Elect Zach
Name & Address F	rom Whom Received 4. Date of Receipt	5. Type of Receipt	6. Amount
Receipt #1	Date of Receipt	Loan from a Lending institu	tion
Name & Address:		Interest	\$
		Refund Rebate	Click for Memo Itemization Type
	ł		
	Fund Raiser	Other (Specify)	
Receipt #2	Date of Receipt	Loan from a Lending Institution	ution
Name & Address:		Interest	\$
		Refund \Rebale	Click for Memo Itemization Type
		Other (Specify)	
	Fund Ralser		
Receipt #3	Date of Receipt	Loan from a Lending Institu	ulion
Name & Address:		Interest	. \$
		Refund VRebato	Click for Memo Itemization Type
		Other (Specify)	
	Fund Ralser		
Receipt #4 Name & Address:	Date of Receipt	Loan from a Lending Instit	ution
Hand & Raisee		Interest	\$
		Refund VRebate	Click for Memo Itemization Typ
	-	Other (Specify)	
<u></u>	Fund Raiser		
Receipt #5 Name & Address:	Date of Receipt		ulion s
		Interest	*
		Refund Rebate	Click for Memo Hemization Typ
	Fund Raiser	Other (Specify)	
Receipt #6	Dale of Receipt	Loan from a Lending Inst	tution
Receipt #6 Name & Address:			\$
			Click for Memo Itemization Typ
		Refund \Rebale	Andrew merica cartinación (1)
	Fund Raiser	Olher (Specify)	······································
Receipt #7	Date of Receipt	Loan from a Lending ins	itution
Name & Address:		Interest	\$
			Click for Memo Itemization Typ
•		Refund \Rebate	
	Fund Ralser	Other (Specify)	Page Subtotal
······	· ·		
		Grand Total of All	Schedules 1A -1

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Page_____ Of _____

	RIBUTIONS B3972
SCHEDULE 1-IK	
CANDIDATE COMM	ITTEE 2. Committee Name Committee to Elect Fach Law
Name and Address from whom received contribution is from an individual, enter last arne first. Check box to indicate if contribution from a Political Committee or an independent ommittee (Both are commonly called PACs). eport all in-kind contributions.	4. Type of In-Kind Contribution (Check applicable box) 7. Amount or 8. Cumulative 5. Date of Receipt Fair Market for Election 6. Name & Address of Vendor from whom goods or services were purchased 7. Amount or 8. Cumulative
ontribution # 1 PAC Receipt? Yes ame & Address:	4. Endorsement or Guarantee of Bank Loan Goods Donated or Loaned Services Donated Services Donated Services Purchased by Candidate or Others Goods or Services Purchased by Candidate or Others-LOAN
over \$100.00 cumulative, please provide: ccupation:	Description
mployer Name & Business Address;	5. Date Of Receipt: 6. Vendor Name & Address: Click Here for Memo Itemization
Fund Raiser Contribution	
ontribution # 2 PAC Receipt? Yes lame & Address	4. Endorsement or Guarantee of Bark Loan Goods Donated or Loaned Services Donated Goods or Services Purchased by Candidate or Others Services Purchased by Candidate or Others
f over \$100.00 cumulative, please provide: Occupation: Employer Name & Address:-	Description 5. Date Of Receipt: 6. Vendor Name & Addross:
Fund Raiser Contribution	Click Here for Memo Itemization
Contribution #3 PAC Receipt? Yes	S 4 Endorsement or Guarantee of Bank Loan Goods Donated or Loaned Services Donated \$\$ Goods or Services Purchased by Candidate or Others Goods or Services Purchased by Candidate or Others
f over \$100.00 cumulative, please provide: Occupation:	Description
Employer Name & Address:	6. Vendor Name & Address: Click Here for Memo Itemization
	·
Fund Raiser Contribution	Page Subtotal

ITEMIZED IN-KIND EXPENDIT	URES
SCHEDULE 1B – IK	N/A 1. Committee I. D. Number
CANDIDATE COMMITTEE	2. Committee Name COMMITTEE TU EKCT Pach Las
Name and Address of person to whom goods or ervices were donated or transferred.	4. Type of In-Kind Expenditure 5. Date: 6. Fair Mark (Check appropriate box and fill in description) Value
xpenditure #1 ame & Address:	4. Donation of goods or services to a Ballot Question Committee Donation of assets to tax exempt charitable Institution Donation of assets to Political Party Committee Other Other Click Here for Memo itemization Type Description
xpenditure #2 ame & Address:	
ixpenditure #3 Jame & Address:	4. Donation of goods or services to a Ballot Question Committee. Donation of assets to tax exempt charitable institution Date Donation of assets to Political Party Committee Other Other Click Here for Memo Itemization Type Description:
Expenditure #4 larne & Address:	
Expenditure #5 Name & Address:	4. Donation of goods or services to a Ballot Question Committee Donation of assets to tax exempt charitable Institution Donation of assets to Political Party Committee Other Description:
	Page Subtotal Grand Total of all Schedules 1B-IK (Complete on last page of Schedule) Enter this on line 7 of the Summ

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	ommittee I. D. Number 83972
CANDIDATE COMMITTEE 2, CA	ommittee Name Committee to Elect Zeich Leahr
Name and address of person or vendor to whom paid	4. Purpose (Required Information) 5. Date 6. Amount
xpenditure #1	0-21-2171 00
Ravenna Independent	Purpose: AONERTISING
500 S Ravenna Rol	Click Here for Memo Ilemization Type
Ravenna, M1 491451	Check box if this expenditure is payment of debt or obligation reported on previous
Fund Raiser	statement
Name RIGHT Strategies LLC address 2153 Wearthy St SF Surte 166 East Grand Rapids, MI 49506	Purpose: Ad Vertising Date 8-26-2020, 1071.70
2153 Wearthy St SE Suite 166	Click Here for Memo Itemization Type
	Check box If this expenditure is payment of debt or obligation reported on previous
Fund Ralser	statement
Expenditure #3	
vame.	\$\$
ddress	Purpose: Date
	Click Here for Memo Itemization Type
	Check box if this expenditure is payment of debt or obligation reported on previous
Fund Raiser	statement
Expenditure #4	
Name	\$
Address	Date
· •	
	Click Here for Memo Itemization Type
Fund Raiser	Check box if this expenditure is payment of debt or obligation reported on previous statement
Expenditure #5	
Name ,	
Address	Purpose: Date \$
	Click Here for Memo Itemization Type
	Check box if this expenditure is payment of debt or obligation reported on previous
Fund Raiser	statement Subtotel this page 7410. 11
	Grand Total of all Schedules 1B (Complete on last page of Schedule) 746. 7
	Enter this total on line 8a of

EXPENDITURES FOR GET-OUT-THE VO	
	1)A 1. Committee I.D. Number 001 12
	2. Committee Name <u>COMMITTEE TO ELECT ZACH</u> ELECTION DAY BUSING OF VOTERS TO THE POLLS, FOR SLATE CARDS, DEET OUT THE VOTE ACTIVITY. Describe the specific Get-Out-The -Vote activity in
CHALLENGERS, POLL WATCHERS, POLL WORKERS, AND Item 41. ALL EXPENDITURE	S ARE REQUIRED TO BE ITEMIZED
. Name and address of person or vendor to whom the expenditure was made	4. Type of Activity
Expenditure #1	a. Election Day Busing of Voters To The Polis
Name & Address:	b. Slate Cards c. Challengers
· · ·	d. Poll Watchers e. Poll Workers \$
	Dale
	f. Get-Out-The Vole Activity (Specify):
	Click Here for Memo Itemization Typ
For Activity Type b-f, check one:	
	Check box if this expenditure is payment of
If in support of, or in opposition to, a ballot proposal, check one:	
Support Oppose	
Statewide Proposal Name	Local Proposal Name Indicate County
Expenditure #2	a. Election Day Busing of Voters To
Name & Address:	The Polls
	b. State Cards c. Challengers
	d, Poll Watchers e. Poll Workers
	f. Get-Out-The Vote Activity (Specify):
	Click Here for Memo Itemization Typ
For Activity Type b-f, check one:	
In-Kind Independent	The second secon
If in support of, or in opposition to, a ballot proposal, check one:	Check box if this expenditure is payment of debt or obligation reported on previous statement
Support Oppose	
Statewide Proposal Name	Local Proposal Name Indicale County
Expenditure #3	a. Election Day Busing of Voters To
Name & Address:	The Polls
	b. Slate Cards c. Challengers
	d. Poll Watchers a. Poll Workers Date
	f. Get-Out-The Vote Activity (Specify):
For Activity Type b-f, check one:	Click Here for Memo Iternization Typ
Independent	Charle how if this expanditure is normant of
If in support of, or in opposition to, a ballot proposal, check one	Check box if this expenditure is payment of debt or obligation reported on previous statement
If in support of, or in opposition to, a ballot proposal, thece die	
	Local Proposal Name Indicate County
Statewide Proposal Name	Sublotal (his page
	Grand Total of all Schedules 1B-G)
-	Grand Total of all Schedules 18-3) (Complete on last page of Schedule

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INCIDENTAL OFFICE EXPENSE DISBURSEMENTS SCHEDULE 1C	Committee I. D. Number	8397	2	
(For use by officeholders only) 2. (Elect Za	
Name and address of person to whom disbursement was made	4. Description of Dist (Be specific & you i disbursement code	nay assign a	5. Dale	6. Amount of Disbursemen
Disbursement # 1 Name & Address:	Purpose	• •		\$
	·		Date Click for Memo Iten	nizalion Type
Check box if this disbursement is payment of debt or obligation	Disbursement Code			
reported on previous statement	Fund Raiser			
Disbursement # 2 Name & Address:	Purpose			\$
	<u></u>		Dale	
			Click for Memo Iter	nizallon Type
Check box if this disbursement is payment of debt or obligation reported on previous statement	Disbursement Code Fund Raiser			
Disbursement # 3 Name & Address:	Purpose		•	
		<u> </u>	Dale	_ 1
			Click for Memo Iter	nization Type
b 1	Disbursement Code			ı
Check box if this disbursoment is payment of debt or obligation reported on previous statement	Fund Ralser			<u></u>
Disbursement # 4 Name & Address:	Purpose			\$
	<u></u>		Date Click for Memo Ite	mization Type
		•		
Check box if this disbursement is payment of debt or obligation	Disbursement Code			
reported on previous statement	Fund Raiser	<u> </u>	Subtotal this page	
• • • •		Grand Total	of all Schedules 1C	
			a hada ot astronoma	Enter this i

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MICHIGAN DEPARTMENT OF STATE BUREAU OF ELECTIONS	·			
* 4	mmillee I.D. Number <u>\$39</u>	72		
			đ .	
SCHEDULE 1E	ommillee Name Coramitee	to Fleet 20	an Latin	<u>ng</u>
		······································		<u>_</u>
This Schedule itemizes:	miltee OR b. Debit	and obligations owed to or	forgiven by the cor	nmlitee.
a Debts and obligations owed by or forgiven the come (Cher	ck either a or b. Use only for the pu	rpose checked.)	8. Cumulative	9. Outstandin
3. Name and Mailing Address of person, vendor or financial institution to whom debt is owed.	4. Type of Obligation (Description) 5. Indicate date debt was	7. Date and amount of each payment	payment to date on debt	Balance at cli of this period (item 6 minus
Check box to Indicate whether debt is owed to an Incorporated business. If debt is a bank loan, please provide information regarding the endorsers or guarantors, if any.	incurred 6. Indicate original amount of debt		h	(tern 8)
Debt #1 Corp? Yes - Owed to or by:	4. Туро:	\$		
	5. <u>Date Debt Was Incurred</u> :	\$	•	
	6. Original Amount of Debt	\$	\$	\$
	\$			FORG
If bank loan, name of endorser or guarantor:		Am	ount Endorsed: \$ _	
Debt #2 Corp? Yes		s		
Owed to or by:	4. Type: 5. <u>Data Debt Was Incurred</u> :			
	5. DATE DEUT WAS AREDITED.	\$		
	6. Original Amount of Debt:	s	\$	\$
	\$	\$		FORGI
		A	mount Endorsed: \$. <u></u>
If bank loan, name of endorser or guarantor: Debt #3 Gorp? Yes		s		
Owed to or by:	4. Type: 5. <u>Date Debt Was Incurred</u> :	<u> </u>		
	5, Date Debt yend Diedited			
	6. Original Amount of Debt:	s	\$	_ [\$
	\$			FORG
		······································	Amount Endorsed:	¢e ·
If bank loan, name of endorser or guarantor:				₩
		Page Subtol	tal (Outstanding del	ot)
	(Complete on last page of Schedu	Grand Tol	al of all Schedules y or to the committe	1E 16)
				on line 12: by"" or line
A debt or obligation must be shown on this Scho this Campaign Statement or It was forgiven durb	adule if there was an outstanding ng the period covered by this Ca	amount owed on it at the mpalgn Statement.	closing date of	"owed to" Summary
Page of				-

MICHIGAN DEPARTMENT OF STATE BUREAU OF ELECTIONS

NA

			020-	7 <i>/</i> ~		
FUND RAISER	SCHEDULE 1F	1. Committee I.D.	Number 837	12		
	COMMITTEE	2. Committee Nar	no Committee	to Elect	Pach L	<u>atur</u> ng
	- USE A SEPARAT	TE SHEET FO	OR EACH EVEN			
3, Date Event Was Held	4. Number of Individuals Att or Participating (whichever I greater)		of Fund Raising Activity	6. Address a place where	ind Name (if any the activity was) of the held.
	_	meennestenet		Private	Residence	<u></u>
7. Total Contributions					,	
8. Other Receipts	<u></u>		<u></u>			
9. Gross Receipts (Add line	es 7 and 8)			•		
10. Total Cost of Event (Total Cost includes In-Kine	d Contributions and All Expe	nditures Made F	or the Event)			
11. Check if event was	a joint fund raiser and com	olete the followin	ig:			
Co-Sponsor(\$)	Contri	bution Split (%)		Expendl (۴	iture Split 6)	
		í <u></u>			<u> </u>	_
				<u></u>	<u>.</u>	
· · · · · · · · · · · · · · · · · · ·						
		<u></u>				
<u></u>		<u></u>				
<u></u>	·			<u></u>		
				••••••••••••••••••••••••••••••••••••••		<u> </u>

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Each committee that participated in a joint fund raiser must file a Fund Raiser Schedule for the event. .

Page _____ of _____

The committee is required to file a separate Fund Raiser Schedule for each fund raising event held during the period covered by the Campaign Statement. Receipts and expenditures listed on a Fund Raiser Schedule must also be reported on the Itemized Contributions Schedule (1A), Itemized In-Kind Contributions Schedule (1-IK), Itemized Expenditures Schedule (1B) and the Summary Page.

EXHIBIT 4

MICHIGAN DEPARTMENT OF STATE CAMPAIGN FINANCE COMPLAINT FORM

Complainant: Donald Munski Alleged Violator: Zachary T. Lahring

MICHIGAN CAMPAIGN FINANCE ACT (EXCERPT) Act 388 of 1976

169.243 Expenditure by agent or independent contractor; requirements; violation; penalty.

Sec. 43. An expenditure shall not be made, other than for overhead or normal operating expenses, by an agent or an independent contractor, including an advertising agency, on behalf of or for the benefit of a person unless the expenditure is reported by the committee as if the expenditure were made directly by the committee, or unless the agent or independent contractor files a report of an independent expenditure as provided in section 51. The agent or independent contractor shall make known to the committee all information required to be reported by the committee. A person who knowingly is in violation of this subsection is guilty of a misdemeanor and shall be punished by a fine of not more than \$1,000.00, or imprisoned for not more than 90 days, or both, and if the person is other than an individual the person shall be fined not more than \$10,000.00.

History: 1976, Act 388, Eff. June 1, 1977.

Page 1 Michigan Compiled Laws Complete Through PA 168 of 2021 Courtesy of www.legislature.mi.gov

EXHIBIT 5

MICHIGAN DEPARTMENT OF STATE CAMPAIGN FINANCE COMPLAINT FORM

Complainant: Donald Munski Alleged Violator: Zachary T. Lahring

•				•
KAT MICHIGAN DEPARTMENT OF STATE	2	A 6 Amar Lang	land	
BUREAU OF ELECTIONS		DEC 0 2 202		
CANDIDATE COMMITTE COVER PAGE	E	NANCY A. WATI MUSKEGON COUNTY C	ERS FOR OFFICIAL USE ONLY	
Report must be legible, typed or printed in ink and a the treasurer (or designated record keeper) and car	igned by ididate.	3. This Statement covers From	10-19-2020 to 11-23-2020	
Committee I.D. Number	• •	4. Candidate Last Name	First Name M.I.	
83472		Lanting 4a, Office Sought Including Dis	Lachary T	
Committee Name Committee to clect Zall	1 [.]	County Comm	Issioner District 5	
Lanru	101	4b. County of Residence	JSKegon	
. Committee's Mailing Address	U	6. Treasurer's Name & Reside	ntlal Address	
spoeiman, Houngh + Fei	dt	Daniel Feldt		
THE W. Randau	1	4203 Pontali		
Coopersville, MI 444	104 U	Fruitport, M	49415	
Area Code and Phone <u>1010 - 837 - 810</u> the address in this box is different from the commit	tee			
ailing address on the Statement of Organization, me e sent to this address by the filing official.	all may	Area Code & Phone 6110		
Treasurer's Business Address	J.L	8. Designated Record Keeper Designated Record Keeper)	s Name and Address (If the committee has a	
Spoelman, Hovingh. + Fe				
719 W Randau				
Coopersuite, MI 49404	1		· · · · ·	
i y	ł			
Area Code and Phone <u>010 - 837 - 8104</u>	1 ==	Area Code and Phone	8e. Dissolution of Candidate Committee	
9. TYPE OF STATEMENT	Required O	NLY if candidate		lobt i
9a. Pre-Election OR 9b. Post-Election	is not on the current year	ballot for the	By checking this item I/We certify any outstanding of by the committee to the candidate or his or her spouse i by discharged and forgiven, and no longer collectible fro	s here i
re-Election or Post-Election Statement relates to:	July Quar	leriv	the committee. The committee has no oustanding asse lowes no lates fees or has any oustanding debt.	18,
Primary	October (
General		trantiny .	Further, if the dissolution cannot be granted, that this be considered a request for the Reporting Waiver.	
Convention				
	^{9c.} 🔲 Annu	al Statément () Coverage Year	Effective date of dissolution	
_School	9d. 🔲 Amei	idment to Campaion Statement		
Caucus	(Com Indica	plete Item 9a, 9b, 9c or 9e to the which Statement is being	Note: The disposition of residual funds must be reported Schedule 1B and the Summary Page.	ton
	amen	ded.)		
Date of Election, Convention or Caucus				
11-2-2020	·			
0, Vertification: I/We certify that all reasonable dilige ny/our knowledge and belief the contents are true, a	ence was used	In the preparation of this statem	ent and attached schedules (if any) and to the best of	l
Current Treasurer or Thomas and the		na.M	11.76.20	
Designated Record keeper	Feldt	Signature	Date 11-24-20 Date 11-24.20	-
		A L	K / in an an	
Candidate Zach Lahnne	~1L	V UNA 1	Date 11-dt.du	ŀ



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MICHIGAN DEPARTMENT OF STATE BUREAU OF ELECTIONS

	1, Committee I.D. Number 83972	2
SUMMARY PAGE CANDIDATE COMMITTEE	2. Committee Name COMMITTEE TO	elect Zach lanning
RECEIPTS	Column I This Period	Column II Cumulative this election cycle
3, Contributions	~ <u>~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ </u>	
a. Itemized (Schedule 1A - Column 6)	(3a.) \$ <u>500</u> .	
b. Unitemized (less than \$20.01 each - no Schedule)	(3b.) \$ NOT APPLICABLE	in HAA
c. Subtotal of "Contributions"	(3c.) \$	(18.) \$ 12,400
4. Other Receipts (Schedule 1A -1, Column 6)	(4.) \$	(18) \$
5. TOTAL CONTRIBUTIONS AND OTHER RECEIPTS (Add Line 3c + Line 4)	(5.) \$ <u>500</u> .00	(20.) \$ 12,400
IN-KIND CONTRIBUTIONS & EXPENDITURES		
6. In-Kind Contributions (Schedule 1-IK, Column 7)	(6.) \$	(21.) \$
7. In-Kind Expenditures (Schedule 1B-IK, Column 6)	(7.) \$	(22.) \$
EXPENDITURES		
8. Expenditures	11 000 00	
a. Itemized (Schedule 1B, Column 6)	(Ba.) \$ 4,398.09	
b. Itemized Get-Out-the-Vole (Schedule 1B-G)	- (8b.) \$	
c. Unitemized (less than \$50.01 each - no Schodule)	(8c.) \$ <u>3</u> , ••	
9. TOTAL EXPENDITURES (Add Line 8a + Line 8b + Line 8c)	(0) \$ <u>4,401.04</u>	(23.) \$ 5,364.21
INCIDENTAL EXPENSE DISBURSEMENTS (Officeholders Only)		
10. Disbursements a. Itemized (Schedule 1C, Column 6)	(10в.) \$	
b. Unitemized (iess than \$50.01 each - no Schedule)	(10b.) \$	
11. TOTAL INCIDENTAL EXPENSE DISBURSEMENTS (Add Line 10a + Line 10b)	(11.) \$	(24.) \$
DEBTS AND OBLIGATIONS 12. Debts and Obligations	() (<u> </u>	
a. Owed by the Committee (Schedule 1E)	(12a.) \$	
b. Owed to the Committee (Schedule 1E)	(12b.) \$ BALANCE STATEMENT	
 Ending Balance of last report filed (Enter zero if no previous reports have been filed.) Amount received during reporting period (Line 5, Total Contributions & Other Receipts) SUBTOTAL Add lines 13 and 14 Amount expended during reporting period (Add lines 9 and 11) ENDING BALANCE (Subtract line 16 from line 15) 	$\begin{array}{c} \text{(13.)} & \underline{10, 936, 98} \\ \text{(14.)} + \underline{500, 00} \\ \text{(15.)} = \underline{511, 436, 98} \\ \text{(16.)} - \underline{54, 41401, 09} \\ \text{(17.)} & \underline{7, 035, 79} \end{array}$	•

ITEM	ZED CONTR		1. Committee I.D. Numbe	<u>8397</u>	2
CAN			2. Committee Name	ommittee to	elect Jaen 10
	nd address. If contribution indicate if contribution	Ibution is from an Individu tion is from a Political Cor	al, enter last name, first name, nmiltee or an independent	8. Amount	7. Cumulative for Election Cycle for Each Contributor (Through date of receipt)
	MI HYH	lopublican 45	Executive Com	<u>\$_UU</u>	or Memo Itemization
Occupation		Employer			
Business Address Type of Contribution:	Diract	Loan from a person	Fund Raiser	internet (for the state of t	
3. Contribution #2 Name & Address	PAC Receipi?	YES 4. Date of R	eceipt	\$	_ \$
5. If over \$100.00 cumula Occupation Business Address Type of Contribution:			Fund Raiser	Click Here t	for Memo Itemization
3. Contribution # 3 Name & Address: 5. If over \$100.00 cumul	PAC Recelpl?	YES 4. Date of 1	Receipt	\$ Click Here t	- \$ for Memo Iternization
Occupation	- 	Employer			
Business Address	Direct	Loan from a person	Fund Raiser		
3. Contribution #4 Name & Address	PAC Receipt?	YES 4. Date of	Receipt		
6. If over \$100.00 cumu				Click Here	for Memo Itemization
Occupation		Employer			
Business Address	Direct	Loan from a person	Fund Raiser		
Type of Countingrate L			Page Sut	ototal $(50).00$	יור

	DEPARTMENT OF STATE U OF ELECTIONS TEMIZED OTHER RECEIPTS SCHEDULE 1A-1 N/A	1. Committee I.D. Number 83972
	CANDIDATE COMMITTEE	2. Committee Name COmmittee to elect Zach
	rom Whom Received 4. Date of Receipt	5. Type of Receipt 6. Amount
Receipt #1 Name & Address:	Date of Receipt	Loan from a Lending Institution
ц.		Refund Rebate Click for Memo Itemization Type
	Fund Raiser	Other (Specify)
Receipt #2	Date of Receipt	Loan from a Lending Institution
Name & Address:		Interest \$
		Refund \Rebate Click for Memo Itemization Type
	Fund Ralser	Other (Specify)
Receipt #3	Date of Receipt	Loen from a Lending Institution
Name & Address:		Look institution of the second
		Refund Rebate Click for Memo Itemization Typ
		Other (Specify)
	Date of Receipt	
Receipl #4 Name & Address:		Loan from a Lending Institution
		interest
		Refund Rebate Cilck for Memo Itemization Typ
	Fund Raiser	Other (Specify)
Recelpt #5 Name & Address:	Date of Receipt	Loan from a Lending Institution
		Interest \$
		Refund Rebate Click for Memo Itemization Typ
	Fund Raiser	Other (Specify)
Recelpt #6 Name & Address:	Date of Receipt	Loan from a Lending Institution
- -		Interest \$
	· .	Refund \Rebate Click for Memo Itemization Typ
•	Fund Raiser	Other (Specify)
Receipt #7 Name & Address:	Date of Receipt	
,		\$\$
		Click for Memo Itemization Typ
		Other (Specify)
l	Fund Raiser	Page Sublotal
		Grand Total of All Schedules 1A -1 (Complete on last page of Schedule)

BUREAU OF ELECTIONS ITEMIZED IN-KIND CONTR SCHEDULE 1-IK	N/A 1. Committee I. D. Number 03714	ect zoon louhning
CANDIDATE COMM 3. Name and Address from whom received if contribution is from an individual, enter last name first. Check box to indicate if contribution is from a Political Committee or an independent Committee (Both are commonly called PACs). Report all in-kind contributions.	4. Type of In-Kind Contribution (Check applicable box)	7. Amount or 8. Cumulative Fair Market for Elaction Value Cycle (Through date in item 5)
Contribution # 1 PAC Receip!? Yes Name & Address: If over \$100.00 cumulative, please provide: Occupation: Employer Name & Business Address:	Endorsement or Guarantee of Bank Loan Goods Denated or Loaned Services Donated Goods or Services Purchased by Candidate or Others Goods or Services Purchased by Candidate or Others Goods or Services Purchased by Candidate or Others Society Candidate or Others	\$S
Fund Raiser Contribution Contribution # 2 PAC Receipt? Yes Name & Address	4. Endorsement or Guarantee of Bank Loan Goods Donated or Loaned Services Donated Goods or Services Purchased by Candidate or Others	\$\$
If over \$100.00 cumulative, please provide: Occupation: Employer Name & Address:	Goods or Services Purchased by Candidate or Others- LOAN Description	< Here for Memo Itemization
Fund Raiser Contribulion		
Contribution #3 PAC Receipt? Yes Name & Address: If over \$100.00 cumulative, please provide: Occupation: Employer Name & Address:	Goods Donated or Loaned Services Donated S	\$\$k Here for Memo Itemization
Fund Ralser Contribution		
	Page Subtotal Grand Total of all Schedules 1-IK (Complete on last page of Schedule)	Enter this total on line 6 of Summary

MICHIGAN DEPARTMENT OF STATE BUREAU OF ELECTIONS ITEMIZED IN-KIND EXPENDIT SCHEDULE 1B – IK CANDIDATE COMMITTEE	N/A 1. Committee I. D. Number 83972	lahr
3. Name and Address of person to whom goods or	4. Type of In-Kind Expenditure 6. Fair (Check appropriate box and fill in description) Va	Market
services were donated or transferred. Expenditure #1 Name & Address:		
Expenditure #2 Name & Address:		уре
Expenditure #3 Name & Address:	4. Donation of goods or services to a Bailot Question Committee Donation of assets to tax exempt charitable institution Date Donation of assets to Political Party Committee Other Other Click Here for Memo Itomization Description:	Туре
Expendilure #4 Name & Address:		Туре
Expenditure #5 Name & Address:	4. Donation of goods or services to a Ballot Question Committee Donation of assets to tax exempt charitable Institution Donation of assets to Political Party Committee Other Other Description:	Туре
	Page Subtolal	
	on l	r this tot ne 7 of Summar
Page of		-

MICHIGAN DEPARTMENT OF STATE BUREAU OF ELECTIONS

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SCHEDULE 1B	ommittee I. D. Number 83972
	ommittee Name Committee to elect fach laning
3. Name and address of person or vendor to whom paid	4. Purpose (Required Information) 5. Date 6. Amount 4
Expenditure #1 Name RIGHT STRATEGIES LLC	11-16-2020s 41.230.7.3
Address U SE SUITC 100	Purpose: ACIVERTISING Date
Right Strategies LLC 2153 Wealthy St SF Suite 166 East Grand Rapids, MI 49506	Click Here for Memo Itemization Type Check box if this expenditure is payment of
	debt or obligation reported on previous statement
Expenditure #2	
Address	Purpose: Aduertis 1179 Date 167.34
4491 Pontawna rd	Click Here for Memo Itemization Type
Fruitfort, MI 49415	Check box if this expenditure is payment of debt or obligation reported on previous statement
Expenditure #3	
Name	s
Address	Purpose: Date
	Click Here for Memo Itemization Type
Fund Raiser	Check box if this expenditure is payment of debt or obligation reported on previous statement
Expenditure #4	
Name	s
Address	Purpose:
	Click Here for Memo Itemization Type
Fund Raiser	Check box if this expenditure is payment of debt or obligation reported on previous statement
Expenditure #5	
Name	
Address	Purpose: Date \$
	Click Here for Memo Itemization Type
Fund Raiser	Check box if this expenditure is payment of debt or obligation reported on previous statement
<u> </u>	Sublotal this page 4398.09
	Grand Totel of all Schedules 1B
	Enter this total on line 8a of
Page of	Summary Page

EXPENDITURES FOR GET-OUT-TH		
SCHEDULE 1 B - G		Stan Jan
CANDIDATE COMMITTI		<u>Raca</u>
- AUXIECNACOS DALLWATANEDS SALEWORKE	DE FOR ELECTION DAY BUSING OF VOTERS TO THE POLLS, FOR SLATE CARD RS, AND GET-OUT-THE VOTE ACTIVITY. Describe the specific Get-Out-The -Vote	activity in
Item 4f. ALL EXPEN 3. Name and address of person or vendor to whom the	NDITURES ARE REQUIRED TO BE ITEMIZED [4. Type of Activity 5. Date	6. Amount
expenditure was made		
Expenditure #1 Name & Address:	a. Election Day Busing of Voters To The Polls	
, and a real corr	b. Slate Cards c. Challengers,	
	d. Poli Watchers e. Poli Workers	
	[Get-Out-The Vote Activity (Specify):	
	Click Here for Memo Item	ization Type
For Activity Type b-f, check one:	· · · · · · · · · · · · · · · · · · ·	
In-Kind Independent	Check box if this expenditure is payment of	
If in support of, or in apposition to, a ballot proposal, ch		
Support Oppose	· • • • •	
Statewide Proposal Name	Local Proposal Name Indicate County	
Expenditure #2		
Name & Address:	a Election Day Busing of Voters To The Polis	
	b. Siate Cards c. Challengers	
	d. Poll Watchers e. Poll Workers	\$
	f. Get-Out-The Vole Activity (Specify):	
	Click Here for Memo Item	ization Type
For Activity Type b-f, check one:	·	
In-Kind Independent	Check box if this expenditure is payment of	
If in support of, or in opposition to, a ballot proposal, che	eck one: debt or obligation reported on previous statement	-
Support Oppose		
Statewide Proposal Name	Local Proposal Name Indicate County	
Expenditure #3 Name & Address:	a. Election Day Busing of Voters To	
	b, Slate Cards c. Challengers	
•		\$
· · · · · · · · · · · · · · · · · · ·	d. Poll Watchers e. Poll Workers Date .	
	f. Get-Out-The Vote Activity (Specify):	
For Activity Type b-f, check one:	Click Here for Memo Item	ization Type
In-Kind Independent	Check box if this expenditure is payment of	
If in support of, or in opposition to, a bailot proposal, cf		
	Local Pronosal Name Indicate County	
Statewide Proposal Name	Local Proposal Name Indicate County Subtotal this page	
	Grand Total of all Schedules 18-G)	

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SCREDULE IC		umber <u>8397</u>		son lar
(For use by officeholders only)		Committee	5. Date	6. Amount of
3. Name and address of person to whom disbursement was made	(Be speci	fic & you may assign a nent code*)		Disbursement
Disbursement # 1 Name & Address:	Purpose		•	
· .		·····	Date	
			Click for Memo Ite	emization Type
· · · · ·		Podo		
Check box If this disbursement is payment of debt or obligation		Code	-	
reported on previous statement Disbursement # 2	Purpose			
Name & Address:			Date	\$
			Click for Memo It	omization Type
			Cack for Memorie	Billizadori (3bc
Check box if this disbursement is payment of debt or obligation	a	Code	_	
reported on previous statement		Raiser	·····-	······································
Disbursement # 3 Name & Address:	Purpose		<i>,</i>	\$
	<u></u>		Date	
			Click for Memo II	temization Type
Check box if this disbursement is payment of debt or obligation	Disburseme	nt Code		
reported on previous statement				
Disbursement # 4 Name & Address:	Purpose			<u> </u>
			Date Click for Memo I	lemization Type
	• .			WILLENDOLL 1 JAN
Check box if this disbursement is payment of debt or obligation		l Code		
reported on previous statement	[] Funa	Raiser	Subtotal this pag	je
		Grand	Total of all Schedules * on last page of Schedu	10
		Complete	on last page of achieve	Enter this to on line 10a
PLEASE REFER TO INSTRUCTIONS FOR LIST OF DISBURSEM	FNT CODES		ements ONLY	Summary P

MICHIGAN DEPARTMENT OF STATE BUREAU OF ELECTIONS		•		
DEBTS AND OBLIGATIONS 1. CO	ommittee I.D. Number	972		
			orn' Ind	Arina
CANDIDATE COMMITTEE	ommittee Name <u>(ALWI II.IC.C.</u>	TO Collaca to		
This Schedule Itemizes:		and obligations owed jo or	forgiven by the com	mittee.
a Debts and obligations owed by or forgiven the comi (Chec	ck either a or b. Use only for the pur	pose checked.)	5	
3. Name and Malling Address of person, vendor or financial institution to whom debt is owed.	4. Type of Obligation (Description) 5. Indicate date debt was	7. Date and amount of each payment	8. Cumulative payment to date on debt	9. Outstanding - Balance at close of this period (Item 6 minus
Check box to indicate whether debt is owed to an incorporated business. If debt is a bank loan, please provide information regarding the endorsers or guarantors, if any.	incurred 6. Indicate original amount of debt			Item 8)
Debt #1 Corp? Yes Owed to or by:	4. Type:	·\$		
	5. Date Debt Was Incurred:	\$		
		\$	s.	\$
	6. Original Amount of Debt:	<u> </u>	·	
	\$	<u> </u>		
If bank loan, name of endorser or guarantor:		<u> </u>	ount Endorsed: \$	
Debt #2 Corp? Yes Owed to or by:	4. Type:	\$\$		1
	5. Date Debt Was Incurred:	<u> </u>	E	
	6. Original Amount of Debt:	\$\$	e	\$
	C	\$	· •	
,	· ·	\$		
If bank loan, name of endorser or guarantor:			mount Endorsed: \$_	
Debt #3 Corp? Yes Owed to or by:	4. Туро:	\$	·	
Gwed to bi by.	5. Date Debt Was Incurred:	<u> </u>		
		\$		s .
	6. Original Amount of Debt:	\$	• • •	FORGIVEN
	\$	\$		
If bank loan, name of endorser or guarantor:		-	Arnount Endorsed: \$	·
		Page Subiol	ai (Outstanding deb	o '
		Grand Tol	at of all Schedules 1	E
	(Complete on last page of Scheduk	showing amounts owed by	or to the committee	 Enter this total on line 12a "owe by"" or line 12b
A debt or obligation must be shown on this Sche this Campaign Statement or it was forgiven durin	edule if there was an outstanding ng the period covered by this Car	amount owed on it at the npalgn Statement.	closing date of	"owed to" of the Summary Page
Page of				
			`•	

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MICHIGAN DEPARTMENT OF STATE BUREAU OF ELECTIONS

CANDIDATE	. 2, Com	mittee Name <u>Committee.**</u>		
3. Date Event Was Held	4. Number of Individuals Attending or Participating (whichever is greater)	5. Type of Fund Raising Activity	6. Address and Name (If any) of the place where the activity was held.	
7. Total Contributions		······································		
8. Other Receipts				
9. Gross Receipts (Add line	s 7 and 8)	· ·		
10. Total Cost of Event (Total Cost includes In-Kind	Contributions and All Expenditure	s Made For the Event)		
11. 🔲 Check if event was	a joint fund raiser and complete the	e following:		
Co-Sponsor(s)	Contribution (%)	Split	Expenditure Split (%)	
·	, 			
<u> </u>				
		,		

The committee is required to file a separate Fund Raiser Schedule for each fund raising event held during the period covered by the Campaign Statement. æ

Receipts and expenditures listed on a Fund Raiser Schedule must also be reported on the Itemized Contributions Schedule (1A), Itemized In-Kind Contributions Schedule (1-IK), Itemized Expenditures Schedule (1B) and the Summary Page.

Each committee that participated in a joint fund raiser must file a Fund Raiser Schedule for the event.

Page _____ ___ of ___

EXHIBIT 6 MICHIGAN DEPARTMENT OF STATE CAMPAIGN FINANCE COMPLAINT FORM

Complainant: Donald Munski Alleged Violator: Zachary T. Lahring Example of how to report expenditures made on the campaigns behalf by an agent, or independent contractor.

Example provided by Michigan Department of State at MCFA/MERTS Candidate Training on 6/16/21

CAMPAIGN FINANCE DISCLOSURE TRAINING



CANDIDATE COMMITTEES

Memo Itemization of Expenditure

- A Committee that contracts with an agent or an independent contractor to make expenditures on its behalf must disclose the expenditures made to and by the agent or independent contractor. This is done by Memo Itemizing the expenditure.
 - -Vendors, consultants, campaign workers
 - Credit card payments
 - -Reimbursements

Endent Contractors (Appendix L)

Memo Itemization of Expenditure Example

The Committee to Elect George Mabry hired the firm Primo Consultants to produce some TV adds. Primo Consultants then hired WFAK TV to run the ad on their station. The transactions should be reported in the following way:

ITEMIZED EXPENDITURES SCHEDULE 1B	Committee I D Nomber 999999-1
CANDIDATE COMMITTEE 2	Committee Name Committee to Elect George Mabry
3 Name and address of person or vendor to whom paid	4 Purpose (Required Information) 5 Date 6 Amount
Expanditure #1	
Name Primo Consultants	08/25/17 \$ 5.000.00
Address	Purpose: Hired to produce a TV ad Date
333 Saginaw Lansing MI 48999	Nerno fiemization Below
Fund Raiser	Check box if this expenditure is payment of debt or obligation reported on previous statement
Expenditure #2	
Namo WFAK TV	08/26/17 \$ (3500.00)
Address	Purpose TV station running the ad Date
567 Allegan	(Marro Barrizzabon)
Lansing MI 48999	Check tox (If this expericitive is payment) of debt or obligation reported on previous statement



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

July 25, 2022

Zachary T. Lahring 9770 Judson Ravenna, MI 49451

Re: *Munski v. Lahring* Campaign Finance Complaint No. 2022-01-72-52

Dear Mr. Lahring:

The Department of State (Department) has received a formal complaint filed against you by Donald Munski alleging that you violated the Michigan Campaign Finance Act (MCFA or Act). Specifically, the complaint alleges that you accepted contributions in excess of the amount allowed, and that you reported expenditures without sufficient detail.¹ A copy of the complaint is included with this notice.

In Michigan, contributions to a candidate committee are governed by statute. MCL 169.252. Specifically, in local elections for districts containing fewer than 85,000 people, no person may donate more than \$1,050.00.

https://mertsplus.com/mertsuserguide/index.php?n=MANUALS.LocalLevelOffices.

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 process is included in the enclosed guidebook.

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. Materials may be emailed to BOERegulatory@michigan.gov or mailed to the Department of State, Bureau of Elections,

¹ Mr. Munski also alleged that you failed to include sufficient detail when you reported a \$4,230.73 expenditure to Right Strategies LLC for "advertising." Because Mr. Lahring's campaign statement was accepted as sufficiently detailed by the county clerk, who is Mr. Lahring's proper filing official, the Department dismisses this allegation. MCL 169.216(6).

Zachery Lahring Page 2

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. Munski, who will have an opportunity to submit a rebuttal statement to the Department. After reviewing 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 BOERegulatory@michigan.gov.

Sincerely,

Regulatory Section Bureau of Elections Michigan Department of State

c: Donald Munski

From: Sent: To: Cc: Subject: MDOS-BOERegulatory Monday, August 8, 2022 12:55 PM Even, Kevin B.; MDOS-BOERegulatory Klein, Lisa M. RE: Munski v. Lahring, Campaign Finance Complaint No. 2022-01-72-52

Kevin, Your request for an extension until August 31 regarding the Munski v. Lahring campaign finance complaint is granted.

Regulatory Section Bureau of Elections Michigan Department of State

From: Even, Kevin B. <keven@shrr.com> Sent: Friday, August 5, 2022 2:10 PM To: MDOS-BOERegulatory <MDOS-BOERegulatory@michigan.gov> Cc: Klein, Lisa M. <lklein@shrr.com> Subject: Munski v. Lahring, Campaign Finance Complaint No. 2022-01-72-52

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

Regulatory Section Bureau of Elections Michigan Department of State

To whom it may concern:

Be advised that just today I have been retained by Mr. Zach Lahring to provide the Bureau of Elections with a response to the complaint submitted by Mr. Donald Munski (dated July 25, 2022) alleging that Mr. Lahring violated the Michigan Campaign Finance Act (MCFA or Act) for reasons set forth in his complaint.

Given that the allegations arise out of alleged conduct occurring in September 2020 I need additional time to look into the facts surrounding the allegations and to recover documentation from my client's accountant from that period. Also given my work load I would ask that I be given an extension of time until August 31, 2022 to provide the Bureau of Elections with a written response to the complaint.

If you have any questions or concerns please do not hesitate to contact me at your convenience. Best - Kevin

KEVIN B. EVEN | ATTORNEY SMITH HAUGHEY RICE & ROEGGE Direct Phone: 231-724-4336 | E-mail: <u>keven@shrr.com</u> 900 3rd St., Ste 204 | Muskegon, MI 49440 Phone 231-724-4320 Fax 231-724-4330 Mobile 231-578-1776 | <u>www.shrr.com</u>



***** Smith Haughey Rice & Roegge ***** Please note that this email message and any attachments may contain privileged or confidential information that is protected against use or disclosure under federal and state law. If you have received this in error, please advise by immediate reply. Any transmission to persons other than the intended recipient shall not constitute a waiver of any applicable privileges. Any unauthorized use, disclosure, copying or dissemination is strictly prohibited.

From:	Even, Kevin B. <keven@shrr.com></keven@shrr.com>
Sent:	Wednesday, August 24, 2022 2:18 PM
To:	MDOS-BOERegulatory
Subject:	Campaign Finance Complaint: 2022-02-72-52
Attachments:	Leestma Letter to Bureau of Elections signed 82422(5600578.1).pdf

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

Enclosed please find a signed letter from Mr. Leestma to the Bureau of Elections related to subject complaint number.

KEVIN B. EVEN | ATTORNEY SMITH HAUGHEY RICE & ROEGGE Direct Phone: 231-724-4336 | E-mail: <u>keven@shrr.com</u> 900 3rd St., Ste 204 | Muskegon, MI 49440 Phone 231-724-4320 Fax 231-724-4330 Mobile 231-578-1776 | <u>www.shrr.com</u>



***** Smith Haughey Rice & Roegge ***** Please note that this email message and any attachments may contain privileged or confidential information that is protected against use or disclosure under federal and state law. If you have received this in error, please advise by immediate reply. Any transmission to persons other than the intended recipient shall not constitute a waiver of any applicable privileges. Any unauthorized use, disclosure, copying or dissemination is strictly prohibited. August 24, 2022

VIA Email: BOERegulatory@michigan.gov

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

RE: *Munski v Lahring* Campaign Finance Complaint: 2022-02-72-52

To Whom it May Concern:

I have been contacted by the Mr. Kevin Even, who is representing Mr. Zach Lahring regarding a campaign finance act complaint filed against Mr. Lahring. The essence of the complaint, as I understand, is my wife (Emily Macniela) and I made excessive contributions to Mr. Lahring's campaign committee in 2020. Mr. Even asked that I prepare this letter explaining the circumstances.

After speaking to Mr. Even, it became apparent that my contribution was based on my misunderstanding of the amount that could be contributed. While my wife and I each contributed \$2,100, I now realize that amount is what our combined contribution should have been as the individual contribution cannot exceed \$1,050 per person. In retrospect I mistakenly thought we could each contribute \$2,100.

Mr. Even has also advised me that the campaign committee will be issuing me and my wife a refund for \$1,050 each for a total of \$2,100.00.

Singere

cc: Mr. Kevin B. Even



ATTORNEYS AT LAW

900 Third Street, Suite 204 Muskegon, MI 49440 Phone: 231-724-4320 Fax: 231-724-4330

August 30, 2022

Michigan Department of State Bureau of Elections Richard H. Austin Building -- 1st Floor 430 West Allegan Street Lansing, Michigan 48918 Kevin B. Even Direct: 231-724-4336 keven@shrr.com

VIA Email: BOERegulatory@michigan.gov

RE: *Munski v Lahring* Campaign Finance Complaint: 2022-02-72-52 Our Matter Number: 211924

To whom it may concern:

This correspondence is in response to the formal complaint filed against Mr. Zach Lahring by Donald Munski alleging a violation of the Michigan Campaign Finance Act. We understand the complaint alleges Mr. Lahring accepted contributions in excess of the amount allowed and reported expenditures without enough detail. We also understand that Mr. Lahring's campaign statement was accepted as sufficiently detailed by the county clerk and therefore the charge relating to reported expenditures has been dismissed. Accordingly, the only charge being responded to in this letter has to do with accepting contributions in excess of the amount allowed.

We understand that the maximum contribution to the Committee to Elect Zach Lairing ("Committee") during the election cycle at issue was \$1,050 as published by Michigan Bureau of Elections. The complaint contends that the Committee accepted two contributions from persons in excess of campaign finance limits.

The treasurer for the Committee is Mr. Daniel Feldt. Mr. Feldt is a certified public accountant with Spoelman Hovingh & Feldt Inc, located at 719 W Randall, Coopersville, MI, 49404. Mr. Feldt has confirmed that Ms. Macniela and Mr. Leestma (husband and wife), each donated \$2,100 to the Committee in September 2020, which is the amount the two of them could have contributed collectively ($2 \ge 1,050 = \le 2,100$). Mr. Feldt acknowledges these contributions were not flagged at the time the Committee's report was filed.

I have discussed this matter with Mr. Feldt and concluded that this was a simple mistake made by the contributors who were of the belief that the maximum contribution was \$2,100 each rather than \$2,100 collectively. Following our discussion Mr. Feldt immediately advised he will issue 2 checks in the amount of \$1,050, one payable to Ms. Macniela and the other payable to Mr. Leestma. Mr.

Michigan Department of State, Bureau of Elections August 30, 2022 Page 2

Feldt has copied me on the letter to Ms. Macniela and Mr. Leestma which I have attached. As you can see refunds have already been provided to the contributors. See attachment 1.

I have also spoken to Mr. Leestma who confirms that he was of the mistaken belief that both he and his wife could each contribute \$2,100 to the campaign rather than only \$2,100 collectively. Mr. Leestma has copied me on the letter emailed to the Bureau of Elections outlining his mistake. I have attached a copy of that letter to this response. See attachment 2.

The Department is aware that the Committee's Treasurer timely filed the appropriate reports during the election cycle at issue. This is not a case where the contributions were not reported or reported inaccurately. Knowing of the error it has now been corrected. Further the Department should be aware, based on Committee reports, the money contributed by Ms. Macniela and Mr. Leestma was not expended during the 2020 election cycle. Finally, Mr. Feldt has advised that at the time of the next reporting cycle his reporting will show the reimbursement to Ms. Macniela and Mr. Leestma. If you have any additional questions or concerns, please do not hesitate to contact me.

Sincerely,

KBE/I

Enclosures: Attachment 1 – Letter from Mr. Ryan Leestma Attachment 2 – Letter from Mr. Daniel Feldt

cc: Mr. Zach Lahring Mr. Daniel Feldt

ATTACHMENT 1

Spoelman, Hovingh & Feldt, Inc.

Certified Public Accountants



Daniel J. Feldt, Enrolled Agent Accreditation in Accounting Accreditation in Taxation Joel P. Spoelman, Certified Public Accountant Tracy L. Muller, Certified Public Accountant

August 23, 2022

Mr. Ryan Leestma & Ms. Emily Macniela 1599 Westwind Court North Muskegon, MI 49445

Re: Campaign Contribution, Committee to Elect Zach Lahring

Dear Mr. Ryan Leestma & Ms. Emily Macniela,

I am the treasurer for the Committee to Elect Zach Lahring. It has come to my attention that the two of you each contributed \$2,100 to Mr. Lahring's campaign committee in September 2020 which amount exceeds what could have been contributed by \$2,100.

Given that the amount of \$2,100 was the amount the two of you could have contributed collectively the error was obviously innocent and should have been caught by the committee. Enclosed please find two refund checks payable to each of you in the amount of \$1,050 and please accept the committee's apology for any inconvenience this may have caused.

Sincerely,

.cc Mr. Kevin Even .cc Mr. Zach Lahring 719 West Randall Street Coopersville, Michigan 49404 Telephone (616) 837-8104 Fax (616) 837-5000 E-mail: tax@shfcpa.biz

ATTACHMENT 2

August 24, 2022

VIA Email: BOERegulatory@michigan.gov

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

RE: *Munski v Lahring* Campaign Finance Complaint: 2022-02-72-52

To Whom it May Concern:

I have been contacted by the Mr. Kevin Even, who is representing Mr. Zach Lahring regarding a campaign finance act complaint filed against Mr. Lahring. The essence of the complaint, as I understand, is my wife (Emily Macniela) and I made excessive contributions to Mr. Lahring's campaign committee in 2020. Mr. Even asked that I prepare this letter explaining the circumstances.

After speaking to Mr. Even, it became apparent that my contribution was based on my misunderstanding of the amount that could be contributed. While my wife and I each contributed \$2,100, I now realize that amount is what our combined contribution should have been as the individual contribution cannot exceed \$1,050 per person. In retrospect I mistakenly thought we could each contribute \$2,100.

Mr. Even has also advised me that the campaign committee will be issuing me and my wife a refund for \$1,050 each for a total of \$2,100.00.

Sincerel

cc: Mr. Kevin B. Even

MDOS-BOERegulatory Friday, September 16, 2022 4:03 PM Campaign finance complaint Subject: 2022.09.16 Rebuttal letter Munski v. Lahring.pdf; 2022.08.30 KBE to Bureau - response Attachments: to complaint.pdf

Please see the attached.

From: Sent:

Regulatory Section Bureau of Elections Michigan Department of State



STATE OF MICHIGAN JOCELYN BENSON, SECRETARY OF STATE DEPARTMENT OF STATE LANSING September 16, 2022

Donald Munski 1078 Brookway Court Norton Shores, MI 49441

Re: *Munski v. Lahring* Campaign Finance Complaint No. 2022 – 02 – 72 – 52

Dear Mr. Munski:

The Department of State received a response from Kevin Even, representing Zach Lahring, to the complaint you filed against Mr. Lahring alleging a violation of the Michigan Campaign Finance Act, 1976 P.A. 388, MCL 169.201 *et seq.* A copy of the response is provided as an enclosure with this letter.

You may file a rebuttal statement after reviewing the enclosed response. <u>If you elect to file a</u> <u>rebuttal statement, you are required to do so within 10 business days of the date of this letter</u>. The rebuttal statement may be emailed to BOERegulatory@michigan.gov or mailed to the Department of State, Bureau of Elections, Richard H. Austin Building, 1st Floor, 430 West Allegan Street, Lansing, Michigan 48918.

Sincerely,

Regulatory Section Bureau of Elections Michigan Department of State



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

September 30, 2022

Kevin Even Attorney for Zach Lahring Smith Haughey Rice & Roegge 900 Third Street, Suite 204 Muskegon, MI 49440

Re: *Munski v. Lahring* Campaign Finance Complaint No. 2022 – 02 – 72 -52

Dear Mr. Even:

The Department of State (Department) has finished investigating the campaign finance complaint filed against your client, Mr. Lahring, alleging that your client violated the Michigan Campaign Finance Act (MCFA or Act). This letter concerns the disposition of that complaint.

The complaint alleged that Mr. Lahring accepted contributions in excess of the amount allowed, and that he reported expenditures without sufficient detail.¹

You responded to the complaint. In your response, you acknowledged that each of the two contributors at issue mistakenly contributed \$2,100 to Mr. Lahring in September 2020, which is double the amount that they could have permissibly contributed. You further stated that Mr. Lahring's Committee treasurer acknowledged that these contributions were not flagged at the time the Committee's report was filed. You submitted the treasurer's letter to the contributors along with copies of the receipts for the remittance payments to the contributors, in the amount of the excess contribution.

In a letter dated September 16, 2022, Mr. Munski was given the opportunity to provide a rebuttal but he did not do so.

¹ Mr. Munski also alleged that you failed to include sufficient detail when you reported a \$4,230.73 expenditure to Right Strategies LLC for "advertising." Because Mr. Lahring's campaign statement was accepted as sufficiently detailed by the county clerk, who is Mr. Lahring's proper filing official, the Department dismisses this allegation. MCL 169.216(6).

Kevin Even Page 2

In Michigan, contributions to a candidate committee are governed by statute. MCL 169.252. Specifically, in local elections for districts containing fewer than 85,000 people, no person may donate more than \$1,050.00.

https://mertsplus.com/mertsuserguide/index.php?n=MANUALS.LocalLevelOffices.

The Department has reviewed the evidence submitted in this matter and finds that you have remedied the overpayment violation in a manner and to an extent that is acceptable to the Department.

Because the violation of the MCFA alleged in the complaint has been satisfactorily resolved, the Department dismisses the complaint and will take no further enforcement action. If you have any questions concerning this matter, you may contact me at BOERegulatory@michigan.gov.

c: Donald Munski

Sincerely,

Jenny McInerney, Election Law Specialist Bureau of Elections Michigan Department of State