



**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

2022 MAY -6 PM 3: 37

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 Jewel Patton		Daytime Telephone Number 419-356-6001	
Mailing Address 3285 Deer Creek			
City Lambertville	State MI	Zip 48144	
Email (optional)			

Section 2. Alleged Violator			
Name Joseph Bellino			
Mailing Address 1285 Hollywood Dr.			
City Monroe	State MI	Zip 48162	
Email (optional)			

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

Section(s) of the MCFA alleged to be violated: a. 169.247
b. Mixing public and private funds

Explain how those sections were violated:

a. The ad does not include address of the campaign committee.

b. This is a campaign ad for Senate. The phone number listed is the office where Mr. Bellino is a House Representative. Using a state phone number and state staff is mixing roles and using state resources for his campaign.

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

A picture of the ad on a placemat at a local restaurant (Pete's Garage 930 N. Telegraph Rd. Monroe, MI 48162). I also got a menu/placemat to include.

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

Jessal Quinn
Signature of Complainant

4/22/2022
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

Thank You to Our Advertisers:

Vote

JOE  **BELLINO**

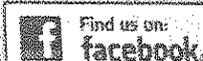
FOR STATE SENATE: 16th District

**"A vote for Joe is a vote for
Jobs and the Economy."**

Back the Blue!



Contact me: (517) 373-1530



Paid for by The Friends of Joe Bellino

LPK 56th Anniversary Celebration Event

Thank You to Our Advertisers:

Vote
JOE 
BELLINO

FOR STATE SENATE: 16th District

"A vote for Joe is a vote for
Jobs and the Economy."

Back the Blue!

 Instagram Contact me: (517) 373-1530  Find us on facebook.

Paid for by The Friends of Joe Bellino

LPK 56th Anniversary Celebration Event



2022 Jeep Wrangler Rubicon



2022 Grand Wagoneer



2022 RAM 1500 Big Horn Crew Cab

“The Low Payment King's are the only Jeep Dealer in Monroe, Lucas & Wayne Counties to advertise Prices and Payments that are valid for Everyone!”

Monroe
SUPERSTORE

(734) 230-7998
16160 S Dixie Hwy, Monroe, MI

BUCKEYE
SUPERSTORE

(877) 675-6269
278 Mansfield Ave, Shelby, OH

OLPK
DEFIANCE

(419) 955-4814
20502 County Rd 424, Defiance, OH

www.LowPaymentKings.com

GRADUATE DEBT FREE



(734) 243-3360



MONROE ALUMINUM PRODUCTS

2 LOCATIONS

ROOFING DIVISION | SIDING DIVISION
520 N. DIXIE HWY. | 845 N. DIXIE HWY.
734.457.5523 | 734.241.5250

MONROE, MI 48162
TOLL FREE: 888.666.7636

WWW.MONROEALUMINUM.COM



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

September 13, 2022

Joseph Bellino
1285 Hollywood Drive
Monroe, MI 48162

Re: *Patton v. Bellino*
Campaign Finance Complaint No. 2022-05-13-47

Dear Mr. Bellino:

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 your committee's address on campaign ads and by including your state representative phone number on campaign materials; a copy of the complaint is enclosed.

The MCFA and corresponding administrative rules require a person who produces printed or electronic material that relates to an election include the phrase "Paid for by [name and address of the person who paid for the item]." MCL 169.247(1), R 169.36(2). A knowing violation constitutes a misdemeanor offense punishable by a fine of up to \$1,000.00, imprisonment for up to 93 days, or both. MCL 169.247(6).

Upon review, the evidence submitted supports the conclusion that a potential violation of the Act has occurred, but the Department also dismisses part of the complaint. First, regarding the allegations for the phone number on campaign materials, the Department dismisses this allegation. While it is true that the Act prohibits a public official from using their public office to expressly advocate for their election, the act of putting a phone number, without more, is not a violation.

Next, 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.*

Mr. Joseph Bellino

Page 2

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 or electronic 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 at BOERegulatory@michigan.gov 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

Enclosure

c: Jewel Patton