



Michigan Department of State
Campaign Finance Complaint Form

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

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MICHIGAN DEPT OF STATE

2022 JUL 22 PM 2:44

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 <i>JACOB RUSHLOW</i>		Daytime Telephone Number <i>264-876-1543</i>	
Mailing Address <i>2230 LEONORA DR.</i>			
City <i>STEVENSVILLE</i>	State <i>MI</i>	Zip <i>49127</i>	
Email (optional) <i>rushlowj62@gmail.com</i>			

Section 2. Alleged Violator			
Name <i>FRIENDS of MATT NILSON</i>		COMMITTEE ID <i>520331</i>	
Mailing Address <i>PO Box 659</i>			
City <i>HARTFORD</i>	State <i>MI</i>	Zip <i>49057</i>	
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*

Explain how those sections were violated:

SEE ATTACHED.

HE HAS 2 BANNERS. I HAS DISCLAIMER, I DOES NOT.

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

SEE ATTACHED

Section 4. Certification (Required)

I certify that to the best of my knowledge, information, and belief, formed after a reasonable inquiry under the circumstances, each factual contention of this complaint is supported by evidence.

X

Signature of Complainant

Date

7-19-22

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

Friends of Matt Nilson has repeatedly violated Michigan Campaign Finance Laws by not including paid for by disclaimers.

Violation 1 – A mass letter sent to GOP primary voters did not include a disclaimer. Recipients of letter did not know senders, so the only way to get their information is from a voter list in the form of a mass mailer. Proof Included.

Violation 2 – A banner supporting Matt Nilson for State Representative did not have a paid for by disclaimer. Picture included.

Violation 3 – A mass handout at the Van Buren County Youth Fair did not have a paid for by disclaimer. Picture included.

Friends of Matt Nilson has repeatedly violated the law, and proof is attached.

June 12, 2022

Dear Kendall and Julia,

There is a new 39th District comprised of Coloma, Hartford, Watervliet, Bainbridge, Van Buren County (minus South Haven and Covert Township) Lee, Cheshire, Trowbridge, and Precinct 1 of Otsego Township. Our Son, Matthew "Todd" Nilson, is running for State Representative of the 39th District.

Matt is eminently qualified for this position:

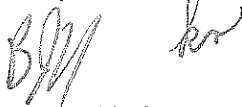
After graduating from West Point, ***Matt served his country.*** He earned the distinction of becoming a Green Beret and Special Forces Officer. While assigned in California, Matt acquired his Masters Degree in Defense Analysis at the Post Naval Graduate College. Later he led troops in combat operations while in South Central Iraq. After 20 years of fighting for America, he retired a Lieutenant Colonel.

During retirement, Matt returned to Hartford and completed his MBA at Kenan-Flager Business School, though the University of North Carolina. ***Matt serves his community.*** As the former Director of Business Development at Golden Plains Farms, he expanded his knowledge of agriculture and farming experience including but not limited to hiring H2A visa holders and filing the forms required by the government so these individuals could work on the farm. Currently, ***Matt serves his community*** by sharing his knowledge and skill of wrestling with the youth at Hartford High School as their coach.

Now ***Matt wants to serve YOU*** by becoming the State Representative of the 39th district. We believe he has the life experiences, integrity, education, leadership and critical thinking skills needed in this state at this time.

Highest Regards,

Barry and Karen Nilson



PLEASE HELP MATT, HELP YOU

- Display a campaign sign in your yard.
- Host a small gathering at your home with Matt in attendance.
- Volunteer your time—walk in a parade, for example
- Follow Matt on facebook.
- Donate to Matt's campaign.
- **VOTE in the August 2nd Primary for MATT NILSON**

If you want to learn more or help, call 269-447-1166 or visit

vote@mattnilson.com and <https://facebook.com/votenilson>



Why I am going to vote for **Matthew Nilson**
Republican Primary election as the State Representative New
39th District on August 2nd.

My name is Bruce K. Thatcher and I am a Vietnam Veteran and resident of Bangor Township in Van Buren County, Michigan.

Both candidates are of good moral character . Pauline Wendzel is a fine young women but, Matt Nilson would be a better state Representative for the new 39th District than her.

Education:

Pauline earned a Bachelor of Arts degree in Anthropology and Food Industry Marketing from Michigan State.

Anthropology is a science and a philosophy, a way of exploring and understanding others and ourselves in all our global and cultural and biological diversity.

Matthew earned a Bachelor of Science degree in Mechanical Engineering (Aeronautical Systems) from United States Military Academy at West Point.

Engineering ranks among one of the hardest degrees you can earn. The degree requires logic and common sense. Engineering can be very difficult because you're essentially becoming a "professional problem solver" Nov 23, 2021

Master of Science, Defense Analysis. Naval Postgraduate School. Graduate will have a strong background in areas of strategic analysis, decision making, organizational design and theory, conflict resolution, and advanced analytical methods.

Master of Business Administration .Marketing & Global Supply Chain Management, University of North Carolina

Post Education Experience:

Pauline; Programs Director at the North Berrien Historical Museum, Assistant Deputy Clerk for Bainbridge Township, Product brand development manager at Coloma Frozen Foods, and State representative for the old 79th District for 4 years.

Post Education Experience:

Matthew; Parachute, Ranger, Special Forces training, classified training, Platoon Leader, Company EXO, Project Manager 1st Bn/1st Special Forces, Chief Operations Officer 1st Special Forces Group, Strategic Partner Development-International, Chief Operations Officer/ Director of Strategic Plans, Special Operations Command Pacific. Director of Exercises and Training United States



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

September 8, 2022

Friends of Matt Nilson
P.O. Box 659
Hartford, MI 49057

Re: *Rushlow v Friends of Matt Nilson*
Campaign Finance Complaint No. 2022-07-59-247

Dear Friends of Matt Nilson:

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 campaign identifiers on mailers, banners, and handouts; 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 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. 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 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

Attachment

c: Mr. Jacob Rushlow – Via email at rushlowj62@gmail.com