
From: Virgil Kai Smith <virgilksmith@gmail.com>
Sent: Tuesday, November 17, 2020 5:00 PM
To: SOS, Disclosure
Cc: Randy Oram
Subject: MCFA Complaint Donna Squalls Royal Oak Township

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

[Download Attachment](#)
[Available until Dec 17, 2020](#)

Good evening,

Attached is a MCFA Complaint I am filing with the Michigan Bureau of Elections.

Could you please schedule at time to meet to discuss & please email me at time stamped copy of the cover page to acknowledge it has been received.

Thank you

Virgil Smith
Invest in Royal Oak Township
PO Box 21032
Detroit, MI 48221
virgilksmith@gmail.com
(313) 424-0813

[Click to Download](#)

Final draft of MCFA complaint against Supervisor Squalls .pdf
0 bytes

Sent from my iPhone



Michigan Department of State
Campaign Finance Complaint Form

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

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>Virgil Smith (Invest In Royal Oak Township)</i>		Daytime Telephone Number <i>313 424-0813</i>
Mailing Address <i>P.O. Box 21032</i>		
City <i>Detroit</i>	State <i>MI</i>	Zip <i>48221</i>
Email (optional) <i>virgilksmith@gmail.com</i>		

Section 2. Alleged Violator		
Name <i>Donna Squalls</i>		
Mailing Address <i>21241 Westview Ave.</i>		
City <i>Ferndale</i>	State <i>MI</i>	Zip <i>48220</i>
Email (optional)		

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

Section(s) of the MCFA alleged to be violated: *See Attachment Section 3*

Explain how those sections were violated:

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

See Attachment

Section 4. Certification (Required)

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

X

Signature of Complainant

Date

Section 5. Certification without Evidence (Supplemental to Section 4)

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

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

X

Signature of Complainant

Date

Section 15(8) of the MCFA provides that a person who files a complaint with a false certification is responsible for a civil violation of the MCFA. The person may be required to pay a civil fine of up to \$1,000.00 and some, or all, of the expenses incurred by the Michigan Department of State and the alleged violator as a direct result of the filing of the complaint.

Section 6. Submission

Once completed, mail or hand deliver the complaint form with your evidence to the address below. The complaint is considered filed upon receipt by the Bureau of Elections.

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

ADDENDUM

MCFA Complaint Form: Section 3 – Alleged Violations.

Charter Township of Royal Oak Supervisor Donna Squalls is a veteran of municipal government, serving over 20 years, first on the Trustee Board and currently as the Supervisor. Supervisor Squalls operates with complete disregard for the Michigan Campaign Finance Act (MCFA). Detailed below is evidence that over the past two years Supervisor Squalls organized and executed two opposition campaigns to a local ballot initiative as well as successfully being re-elected while completely ignoring the MCFA.

Allegation 1.) Violation of MCL 169.247, Printed matter or radio or television paid advertisement having reference to election, candidate, or ballot question; name and address; identification or disclaimer; size and placement; rules; exemption; statement that payment made "with regulated funds"; communication exempted under section 6(2)(j); violation as misdemeanor; penalty; prerecorded telephone message.

Supervisor Squalls utilized and/or caused to be printed numerous yards signs and literature for her re-election campaign. None of this printed material had any identification bearing the name & address of who paid for the campaign material.

Allegation 2.) Violation of MCL 169.233, Campaign statements; filing schedule; report on expenditures; form; late filing fee; violation as misdemeanor; penalty; prohibitions; filing incomplete or inaccurate statement or report; civil fine; failure to file campaign statements; violation as felony; seizure and forfeiture of money; inventory statement of money seized; notice; hearing; decision; appeal; commencement of action.

(6) A candidate committee or a committee other than a candidate committee that files a written statement under section 24(5) or (6) or that is automatically considered to have made a statement under section 24(5) is not required to file a campaign statement under subsection (1), (3), or (4) unless it received or expended an amount in excess of \$1,000.00. If the committee receives or expends an amount in excess of \$1,000.00 during a period covered by a filing, the committee is then subject to the campaign filing requirements under this act.

Supervisor Squalls campaign for re-election had several publicly identifiable expenditures. She produced two different sets of yard signs as well as various literature pieces. In my experience, these expenditures exceed the threshold of \$1,000.00. Currently Supervisor Squalls candidate committee account has a reporting waiver.

Allegation 3.) Violation of MCL 169.203, Definitions; C.

(4) "Committee" means a person that receives contributions or makes expenditures for the purpose of influencing or attempting to influence the action of the voters for or against the nomination or election of a candidate, the qualification, passage, or defeat of a ballot question,

or the qualification of a new political party, if contributions received total \$500.00 or more in a calendar year or expenditures made total \$500.00 or more in a calendar year.

169.209 Definitions; I to L.

(6) "Local ballot question" means a ballot question of a local unit of government to be voted upon in that local unit of government.

MCL 169.234, Campaign statement of ballot question committee; filing schedule; late filing fees; failure to file statement as misdemeanor; penalty; filing incomplete or inaccurate statement or report; civil fine.

(1) A ballot question committee shall file a campaign statement as required by this act according to the following schedule:

(4) If a treasurer or other individual designated as responsible for the record keeping, report preparation, or report filing of a ballot question committee supporting or opposing a statewide ballot question fails to file a statement, other than a pre-election statement, under this section, that committee, treasurer, or other designated individual shall pay a late filing fee. If the committee has raised \$10,000.00 or less during the previous 2 years, the late filing fee is \$25.00 for each business day the campaign statement remains unfiled, but not to exceed \$1,000.00. If the committee has raised more than \$10,000.00 during the previous 2 years, the late filing fee is \$50.00 for each business day the campaign statement remains unfiled, but not to exceed \$2,000.00.

Supervisor Squalls organized two ballot proposal opposition campaigns in 2019 & 2020 that were both fiercely contested. The 2019 campaign was a ballot proposal titled Proposal 1, and the 2020 campaign was a ballot Proposal titled Proposal R. Neither opposition campaign formed a ballot committee with the Oakland County Department of Elections. Numerous yard signs as well as literature were printed, mailed, and displayed to defeat the ballot initiatives.

Allegation 4.) Violation of MCL 169.247, Printed matter or radio or television paid advertisement having reference to election, candidate, or ballot question; name and address; identification or disclaimer; size and placement; rules; exemption; statement that payment made "with regulated funds"; communication exempted under section 6(2)(j); violation as misdemeanor; penalty; prerecorded telephone message.

All campaign material that was intended to persuade voters to vote against the ballot initiatives have no identifying disclaimer explaining who paid for the material. In 2019, a complaint was filed against this action but was dismissed because a name was not provided on who organized the committee.

Allegation 5.) Violation of MCL 169.224, Statement of organization; time for filing; late filing fee; violation as misdemeanor; penalty; contents of statement; name of sponsor; amendment; statement as to receipts or expenditures; filing statement indicating dissolution of committee; exception; political committee considered as independent expenditure committee.

(1) A committee shall file a statement of organization with the filing officials designated in section 36 to receive the committee's campaign statements. A committee shall file a statement of organization within 10 days after the committee is formed. A filing official shall maintain a

statement of organization filed by a committee until 5 years after the official date of the committee's dissolution. A person who fails to file a statement of organization required by this subsection shall pay a late filing fee of \$10.00 for each business day the statement remains not filed in violation of this subsection. The late filing fee must not exceed \$300.00. A person who violates this subsection by failing to file for more than 30 days after a statement of organization is required to be filed is guilty of a misdemeanor punishable by a fine of not more than \$1,000.00.

(e) A brief statement identifying the substance of each ballot question supported or opposed by the committee. If the ballot question supported or opposed by the committee is a local ballot question, the committee shall identify the county in which the greatest number of registered voters eligible to vote on the ballot question reside.

(f) Identification of the committee as a candidate committee, political party committee, independent committee, independent expenditure committee, political committee, or ballot question committee if it is identifiable as such a committee.

Supervisor Squalls produced a Slate card and a Literature piece that was mailed for the August 2020 Primary Election urging voters to vote for a line-up of candidates led by her re-election to supervisor and ending with "Vote No" on Proposal R. A committee of any type was never formed with the Oakland County Election Department for this purpose.

Allegation 6.) Violation of MCL 169.247, Printed matter or radio or television paid advertisement having reference to election, candidate, or ballot question; name and address; identification or disclaimer; size and placement; rules; exemption; statement that payment made "with regulated funds"; communication exempted under section 6(2)(j); violation as misdemeanor; penalty; prerecorded telephone message.

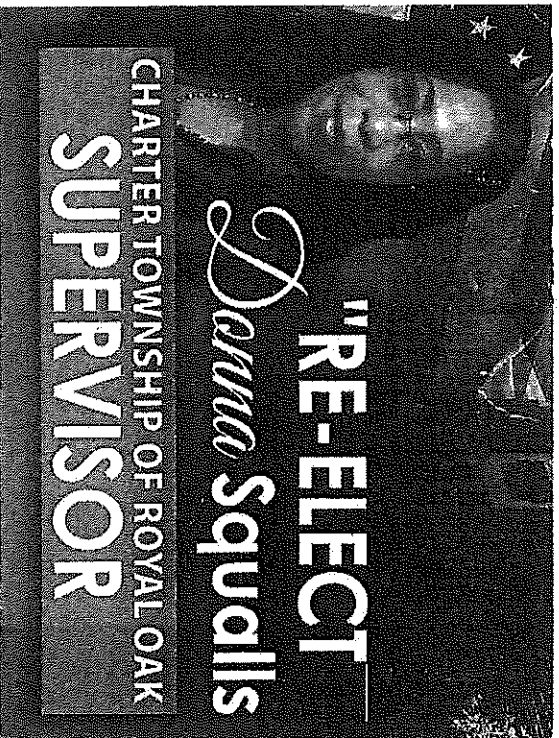
Supervisor Squalls printed a Slate card with no identification of who produced the Slate card and a Literature piece that was mailed with a mythical committee name "United Concern Citizens of Royal Oak Township", no such committee exists with the Oakland County Election Department.

Conclusion:

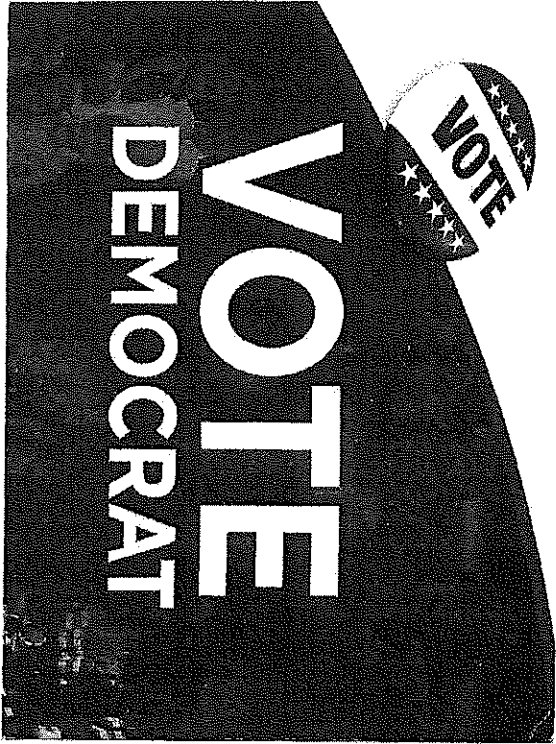
Supervisor Squalls is not unfamiliar with the Michigan Campaign Finance Act. She is not brand new to elective politics. The MCFA requires the Department to "endeavor to correct the violations or prevent a further violation by using informal methods, if it finds that there may be reason to believe a violation has occurred". Given this language, I understand the Department has to pursue this result. However, it is noteworthy to point out Supervisor Squalls is a veteran of politics and is not ignorant to the provisions of the MCFA. Moreover, a complaint was filed in 2019, which demonstrates a complete disregard for the MCFA. Supervisor Squalls operates as if the MCFA does not apply to her and its time she is held accountable for her intentionally subterfuge of the requirements of the MCFA.

Allegation 1 & 2
Evidence That Supports
Allegation

Front



Back



"RE-ELECT"
Danna Squalls

CHARTER TOWNSHIP OF ROYAL OAK
SUPERVISOR

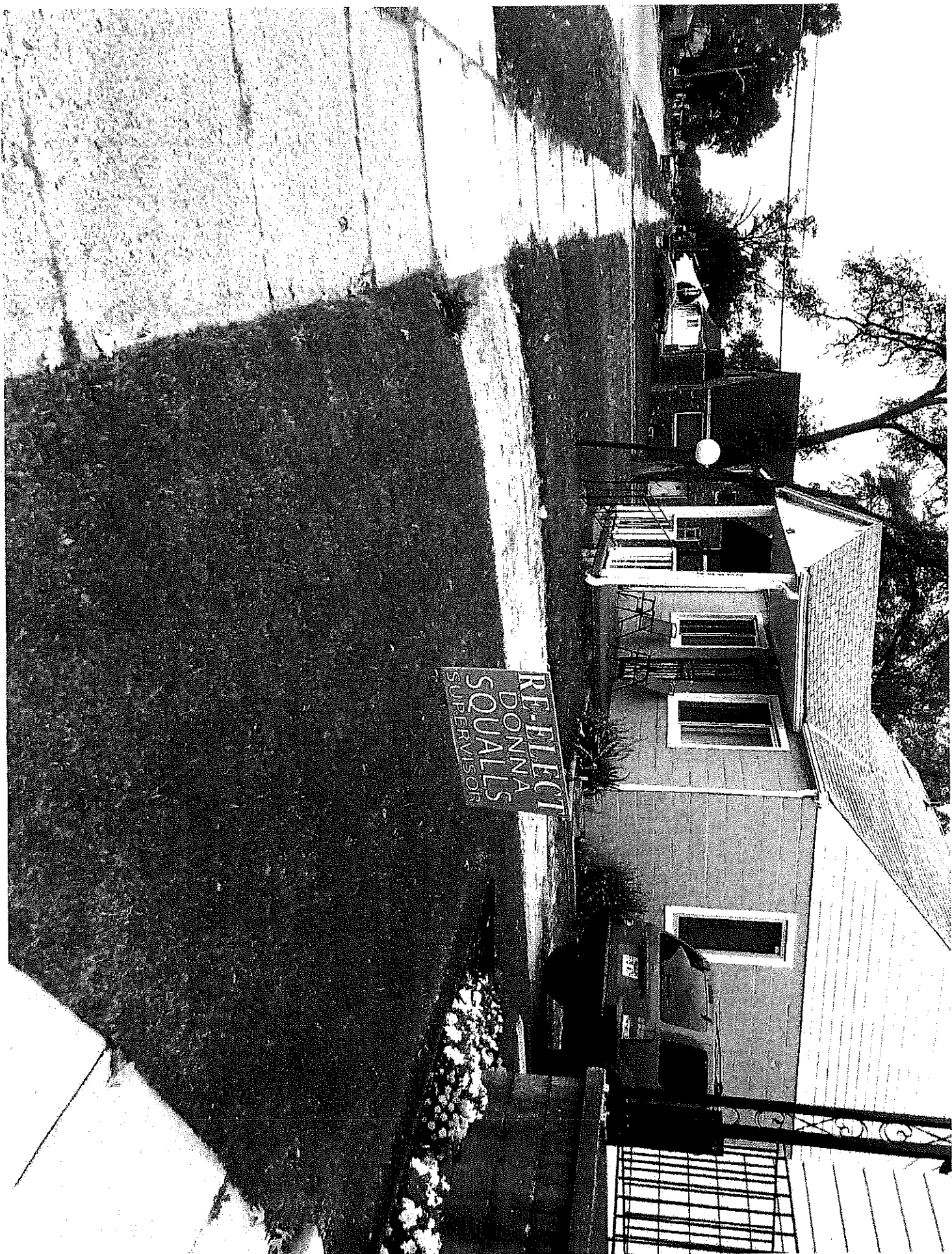


"RE-ELECT"

Anna **Squalls**

CHARTER TOWNSHIP OF ROYAL OAK
SUPERVISOR

VOTE DEMOCRAT



RE-ELECT
DONNA
SQUALLS
SUPERVISOR



ROYAL OAK TOWNSHIP SUPERVISOR

Fellow Residents and Citizens, I am honored and proud to have served and represented you as Supervisor over the past 8 years. I am excited because great things are happening for us. Where we were unnoticed by the State of Michigan, we are now being recognized and respected. That is because of you, the citizens, of Royal Oak Township. I would like to continue this exciting journey with you.

For the first time ever, we've been awarded over 2,000,000 in grants toward the water infrastructure project as well as an additional 300,000 to assist in other Township projects and operations. We've improved our relationship with our neighboring communities and have developed a strong association with Oakland County. I've been a part of the Township's first ever Capital Improvement Plan. I've also been involved in renegotiating the union contract for the first time in 20 years and we've updated the personnel and policy manual as well as our accounting manual.



We now have a Key Site Development Plan and a Roadway Plan which will be implemented in 2021.

For the first time in 30 years we have a new planning firm, and for the first time in 20 years we have entered into a new relationship with a different banking institution which has proven to be of a better financial benefit for Royal Oak Township.

I was instrumental in getting the former Royal Inn closed, which was a blight and adverse to the development and growth that the township is working towards.

We are currently in our demolition phase as we prepare for new development and I am very proud to be a part of one of the most important projects Royal Oak Township will have - Our New Municipal Center.

I am a lifelong resident and I know the tight-knit community we are and have always been. I will continue as I always have, to be dedicated and work hard toward successful growth and progress for you, the citizens, while maintaining our close knit community atmosphere.

It is time for growth and progress in the community but not time for change in the leadership that has worked so hard for that growth. Please allow me the honor to continue to serve you as we work toward POSITIVE continued growth and progress.

RE-ELECT DONNA SQUALLS FOR TOWNSHIP SUPERVISOR



[Begin a New Search](#)

[View Campaign Statements](#)

[Return to Search Results](#)

Committee Details

Committee ID: 95633

Committee Name: DONNA SQUALLS

Committee Type: CANDIDATE

Formation Date: 06/05/2012

Has Waiver: Yes

Candidate: SQUALLS, DONNA J

Jurisdiction: ROYAL OAK TWP

Office: TOWNSHIP SUPERVISOR

Political Party: DEMOCRAT

Committee Address: 21241 WESTVIEW AVE.
FERNDAL, MI 48220

Telephone: (248) 541-4112

Mailing Address: 21241 WESTVIEW AVE.
FERNDAL, MI 48220

Treasurer: SQUALLS, DONNA
21241 WESTVIEW AVE.
FERNDAL, MI 48220

Telephone: (248) 541-4112

[Begin a New Search](#)



MICHIGAN DEPARTMENT OF STATE
BUREAU OF ELECTIONS

OAKLAND COUNTY CLERK - ELECTIONS DIVISION
1200 N TELEGRAPH RD, DEPT 417
PONTIAC MI 48341-0417

ORIGINAL OR AMENDED

STATEMENT OF ORGANIZATION FORM FOR CANDIDATE COMMITTEES

1. Committee ID #: 95633

2. Type of Filing:
☒ Original
☐ Amendment to Items: _____ Eff. Date: _____

3. Full Name of Committee (must include Candidate's first and last name): DONNA SQUALLS

4a. Candidate Full Name (Last, First, M.I.):
SQUALLS, DONNA, J.

4b. Political Party (if applicable):
Democratic

4c. County of Residence:
OAKLAND

4d. Office Sought (Check one):

<input type="checkbox"/> Governor	<input type="checkbox"/> Lt. Governor	<input type="checkbox"/> State Senator
<input type="checkbox"/> State Rep.	<input type="checkbox"/> Sec. of State	<input type="checkbox"/> Attorney Gen.
<input type="checkbox"/> State Bd. of Ed.	<input type="checkbox"/> UofM Reg.	<input type="checkbox"/> MSU Trustee
<input type="checkbox"/> WSU Gov.	<input type="checkbox"/> Supreme Court	<input type="checkbox"/> Appeals Court
<input type="checkbox"/> Circuit Court	<input type="checkbox"/> District Court	<input type="checkbox"/> Probate Court
<input type="checkbox"/> Municipal Court		

Local or other please specify: SUPERVISOR/MAYOR

4e. District/Circuit # or Jurisdiction: CHARTER TOWNSHIP OF ROYAL OAK

5. Date Committee was Formed: 6.5.12

6a. Committee Phone #: 248-541-4112

6b. Committee Fax #: _____

6c. Committee E-mail Address: Squallsgrac@yahoo.com

6d. Committee Website Address: _____

7a. Complete Comm. Mailing Address (May be PO Box):
21241 Westview
Ferndale, Michigan 48220

7b. Complete Comm. Street Address (May not be PO Box):
21241 Westview
Ferndale, Michigan 48220

8. Treasurer Name and Complete Address:
DONNA Squalls
21241 Westview
Ferndale, Mich. 48220

Phone #: 248-541-4112

E-mail Address: Squallsgrac@yahoo.com

9. Designated Record Keeper Name and Complete Address:

Phone #: _____

E-mail Address: _____

10. ☒ REPORTING WAIVER REQUEST: If the committee does not expect to receive or expend in excess of \$1,000 in an election and checks this box, the filing requirement of pre, post and annual campaign statements is waived. The Reporting Waiver will be automatically lost if the committee exceeds the \$1,000 threshold.

11. Name and Address of Depositories or Intended Depositories of committee funds. (Michigan Bank, Credit Union or Savings & Loan Association)

a. Official Depository
Citizens Bank
800 S. Main St.
Royal Oak, Mich 48067

b. Secondary Depository

12. ☐ This item applies only to Gubernatorial Candidate Committees: Check if this committee intends to seek qualifying contributions or make qualifying expenditures.

13. ELECTRONIC FILING: This item applies to committees that file with the Michigan Department of State Bureau of Elections only and does not apply to Ballot Question Committees that file with the County Clerk's office.

The Campaign Finance Act requires any committee that files with the Secretary of State and spends or receives \$20,000 in the preceding calendar year OR expects to spend or receive \$20,000 in the current calendar year to file campaign statements electronically. MERTS Plus software is provided to you free of charge to assist you in meeting this requirement.

☐ Committee spent or received or expects to spend or receive in excess of \$20,000 and is required to file electronically.

**** OR ****

☐ Committee did not spend or receive or does not expect to spend or receive in excess of \$20,000 and would like to file electronically voluntarily.

14. Verification: I/We certify that all reasonable diligence was used in the preparation of the above statement and that the contents are true, accurate and complete to the best of my/our knowledge or belief. If filing electronically, we further agree that the signatures below shall serve as the signatures that verify the accuracy and completeness of each statement filed electronically by the committee. I/We certify that all reasonable diligence will be used in the preparation of each statement electronically filed by this committee and that the contents of each statement will be true, accurate and complete to the best of my/our knowledge or belief. (Sign Name and Date)

Donna Squalls 6.5.12
Candidate

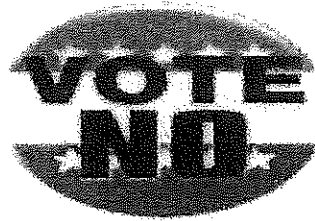
Donna Squalls 6.5.12
Current Treasurer

Designated Record Keeper (Required only if filing electronically)

RECEIVED FOR FILING
OAKLAND COUNTY CLERK
2012 JUN -8 PM 3:35
DEPUTY COUNTY CLERK

Allegation 3
Evidence That Supports
Allegation

ATTENTION TO ALL RESIDENTS



MAY 7, 2019

LET'S STICK TOGETHER AND SEND A MESSAGE AND
VOTE **NO** ON THE PROPOSAL THAT WAS
PUSHED ON OUR BALLOT. **DO NOT**
BELIEVE WHAT YOU HAVE READ.
PUTTING ANY OF THESE UNWANTED MARIJUANA
DISPENSARIES INTO OUR COMMUNITY WILL NOT
BENEFIT OUR FAMILY ORIENTED COMMUNITY.

IT WILL ONLY HINDER IT.

ONCE AGAIN **VOTE NO ON PROPOSAL 1**
FOR MARIJUANA DISPENSARIES!

Recreation Center at 21272 Mendota Ave
Ferndale, MI 48220

ROYAL OAK TOWNSHIP

**Vote NO on PROPOSAL 1
MAY 7, 2019**

**SAY NO TO
MARIJUANA DISPENSARIES
IN OUR COMMUNITY**

VOTE NO!

ON

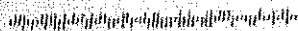
Proposal R

 **NO**
ON PROPOSAL "R"

**Don't Need It
Will Create Crime
&
Tear Down Community**

[illegible]

46250-220674



BLACK COMMUNITIES MATTER ARAB MAN GET YOU KNEE OFF OUR NECK

You are still coming at this community with lies you are sending in the mail about jobs and big salaries for your weed company you know it is a lie. What is fact:

- You lost the last election by a large margin that voted **NO** in May 2019.
- You have and still are paying your airhead worker bees and puppets tuition, taxes, legal fees and other favors if they perform your will. It is sad to see residents on your payroll and a couple of outsiders. But money talks. People sell there sole to the devil for money like Karen Ballard who crossed over to you.
- You are paying \$10-\$20 for resident's vote starting with the senior building on Wyoming. Don't think these people are not smart. Are you not a shame?
- You circulated information that the Board of Trustees are for you and your company and signed a agreement which is a LIE. **NO AGREEMENT HAS BEEN MADE with the board.** Residents do not want it and it is okay. So go away you bad man! You have been asked to move it to your community but your community do not want it.
- You have put together some of your airhead puppets to run against the current board so you can have control of the community. Be for real. The group below is born and raised

RESIDENTS TAKE HEED! HERE IS YOUR LIST TO VOTE FOR! REAL PEOPLE THAT CARE!

Supervisor – Donna Squalls

Treasurer – Patricia Singley

Clerk – Gwendolyn Turner

Wanda Allen – Trustee

Kim S. Tillery – Trustee

Richard S. Miles – Trustee (Write-In his name)

Deja or Pulaski – Trustee (I know the Vickers) This other person is related to the enemy (Mingo's)

I was born and raised in this community, will not let you take advantage and we can find a way for you to use your money other than disrupting black lives. This community has history. Majority Good! We do not need to add to the bad so you can make \$\$\$\$\$\$\$\$ for you.

RESIDENTS – VOTE NO ON PROPOSAL R – BLACK COMMUNITIES MATTER

Paid for by the United Concern Citizens of Royal Oak Township to Elect the above and Vote NO on Proposal R

Allegation 4
Evidence That Supports
Allegation

Campaign Finance Complaint Form Michigan Department of State

This complaint form may be used to file a complaint alleging that someone violated the Michigan Campaign Finance Act (the MCFA, 1976 PA 388, as amended; MCL 169.201 *et seq.*). All information on the form must be provided along with an original signature and evidence. **Please print or type all information.**

I allege that the MCFA was violated as follows:

Section 1: Complainant		
Your Name Matthew Schenk		Daytime Telephone Number (313) 965-2121 x7024
Mailing Address 535 Griswold, Suite 850		
City Detroit	State MI	Zip 48226

Section 2: Alleged Violator		
Name Unknown (potentially related to first campaign finance violation in the same election)		
Mailing Address		
City	State	Zip

Section 3: Alleged Violation (Date additional information is provided: 06/06/2019)

Section(s) of the MCFA violated: MCL 169.247

Explain how those sections were violated: The attached lawn sign(s) started appearing in the township the week before the May 7, 2019 election. There is no indication of who is paying for the lawn sign, if there is a committee organized to fund these expenditures in opposition, or to identify the Treasurer of the organization. Further, in the wake of a similar flyer that was recently distributed with the names of all current trustees of the Township voicing opposition to Proposal 1, there is a concern that the same political leaders of the community are behind the lawn signs.

This fear is further bolstered by the fact that the official website of Royal Oak Township identifies the two other proposals that are on the May 7 ballot, but does not disclose that Proposal 1 related to authorizing marijuana businesses is also on the ballot. The Township voted unanimously to ban those businesses, but the voters placed this initiative on the ballot and had to go to court and the court of appeals to get the matter placed on the ballot.

Evidence that supports those allegations (attach copies of pertinent documents and other information):

Picture of lawn sign attached. Also, the link to the article related to the prior MCFA complaint.

<http://oaklandcounty115.com/2019/04/25/former-state-senator-among-those-campaigning-for-marijuana-business-in-royal-oak-township-mel-farr-site-under-consideration/>

Section 4 (Certification Required)

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

X

Signature of Complainant

Date

Section 15(6) of the MCFA (MCL 169.215) requires that the signed certification found in section 4 of this form be included in every complaint. However, if, after a reasonable inquiry under the circumstances, you are unable to certify that certain factual contentions are supported by evidence, you may also 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:

See Above

X



Signature of Complainant

5-3-19

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.

Mail or deliver the completed complaint form with an original signature and evidence to the following address:

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

PRESS RELEASE

VOTER SUPPRESSION IN ROYAL OAK TOWNSHIP

It is no secret that the Trustees of Royal Oak Township do not want marihuana related businesses in the community, despite more than 60% of the voters approving recreational marihuana at the ballot box in November 2018. Yet, they have now taken that animosity to the extreme.

After fighting against a voter-initiated ballot proposal all the way to the Michigan Court of Appeals and the Township Clerk facing a contempt hearing in front of the Honorable Leo Bowman in Oakland County Circuit Court, the Township continues to break the law in support of their opposition.

Clerk Gwendolyn Turner violated the State Constitutional requirements of Proposal 3 from November 2018 by failing to provide weekend voting the Saturday or Sunday before today's election. She has also continuously refused to list Proposal 1 on the Township's official website, despite listing the other two millage proposals that are on today's ballot. The Clerk also violated Court Order by failing to post the full text of the voter initiative ordinance in each Royal Oak Township polling location.

There have also been two Michigan Campaign Finance Act violation complaints filed with the Secretary of State related to illegal flyers and lawn signs distributed around the Township in opposition to Proposal 1. The opposition flyers include the names of all Township trustees as opposing Proposal 1 but do not comply with the Campaign Finance Act by disclosing the source of funding for the campaign. The flyers were also placed in residents' mailboxes without proper postage affixed. Incredibly, the Township Clerk is listed as opposing Proposal 1, despite having a legal duty to remain impartial in election matters.

Similarly, the lawn signs in opposition to Proposal 1 also fail to disclose a funding source, in violation of state election law. Trustee Miles was seen placing these illegal lawn signs around the Township this morning, including on public land.

Trustee Dixon was also observed within 100 feet of the Recreation Center polling location urging voters to vote no on Proposal 1, another violation of state law. Election law prohibits any campaigning within 100 feet of a polling location.

Invest in Royal Oak Township is a ballot committee properly formed to support the passage of Proposal 1 in Royal Oak Township. If adopted, the Township would authorize an unlimited number of marihuana related businesses on property of at least five acres that has been continuously vacant for at least five years. It will serve as an economic development engine for the Township as well as a catalyst for the redevelopment of obsolete property.

Contact: Virgil Smith
Invest in Royal Oak Township
(313) 424-0813

The Detroit News

OAKLAND COUNTY

State tosses Royal Oak Twp. election violation claims

Mike Martindale The Detroit News

Published 5:55 p.m. ET May 15, 2019

State officials said Wednesday they have dismissed two complaints of alleged election violations involving a defeated marijuana initiative in Royal Oak Township.

Proposal 1 would have authorized an unlimited number of marijuana-related businesses on parcels larger than five acres that had been continuously unoccupied for at least five years.

In what is believed to be the first challenge to a Michigan community's decision not to permit such businesses, the Invest in Royal Oak Township group sued to have the question put on the ballot in a special election earlier this month and finally turned to the Michigan Court of Appeals to have the matter put before voters.

The proposal lost overwhelmingly in the May 7 special election, with 70 percent voting no.

Invest in Royal Oak Township, led by former state lawmaker Virgil Smith, cried foul, claiming township officials violated several campaign finance laws. The group filed two complaints with the Michigan Department of State, which includes the Bureau of Elections, which monitors elections across the state for fairness.

"The Michigan Department of State has dismissed both complaints," said Shawn Starkey, a spokesman for the department. "The petitioner can always refile with new evidence but these allegations have been dismissed."

Starkey said one complaint involved a lawn sign that allegedly violated election law because it did not contain identification of who printed it other than "unknown." Starkey said the state does not investigate "unknown" persons.

A second complaint focused on a photograph of a flyer that allegedly showed the township board of trustees and elected township clerk were urging voters to vote "no" on Proposal 1.

"You couldn't read it, it was illegible," explained Starkey. "But even if there are names printed on it with their permission, that is not an election law violation, providing it wasn't produced with township funds or materials."

Starkey said that complaint also can be refiled.

Matthew Schenk, an attorney for Invest in Royal Oak Township, said Wednesday he has not received any formal notification from the state regarding the complaints.

“We are still exploring all our options,” said Schenk. “We believe there were a variety of violations involving campaign finance laws and also what the township was ordered to do regarding a special election.”

Schenk noted there is still a civil action, with possible contempt penalties, pending against the township before Judge Leo Bowman of Oakland County Circuit Court.

Bowman had ordered that the entire wording of Proposal 1 be posted in a conspicuous location at polling precincts but the Invest in Royal Oak Township group say that was never done. The group also says the township never held any open office hours on the weekend before the special election, as required by law.

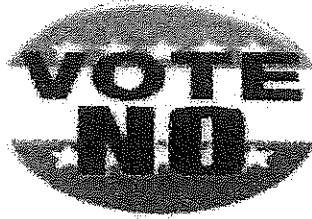
Township officials and their attorney have repeatedly refused to discuss the proposal, before or after its defeat.

Smith, an unsuccessful 2017 candidate for Detroit City Council who served in the state Senate and House, has said the marijuana proposal could provide jobs and raise about \$400,000 a year in property tax for the beleaguered township, which in recent years has disbanded its police and fire departments due to fiscal problems.

mmartindale@detroitnews.com

(248) 338-0319

ATTENTION TO ALL RESIDENTS



MAY 7, 2019

LET'S STICK TOGETHER AND SEND A MESSAGE AND
VOTE **NO** ON THE PROPOSAL THAT WAS
PUSHED ON OUR BALLOT. **DO NOT**
BELIEVE WHAT YOU HAVE READ.
PUTTING ANY OF THESE UNWANTED MARIJUANA
DISPENSARIES INTO OUR COMMUNITY WILL NOT
BENEFIT OUR FAMILY ORIENTED COMMUNITY.

IT WILL ONLY HINDER IT.

ONCE AGAIN **VOTE NO ON PROPOSAL 1**
FOR MARIJUANA DISPENSARIES!

Recreation Center at 21272 Mendota Ave
Ferndale, MI 48220

ROYAL OAK TOWNSHIP

**Vote NO on PROPOSAL 1
MAY 7, 2019**

**SAY NO TO
MARIJUANA DISPENSARIES
IN OUR COMMUNITY**

VOTE NO!

ON

Proposal R

 **NO**
ON PROPOSAL "R"

**Don't Need It
Will Create Crime
&
Tear Down Community**

Allegation 5 & 6
Evidence That Supports
Allegation

FRONT

• **Supervisor:**
Donna Squalls

• **Clerk:**
Gwendolyn Turner

• **Trustee:**
Wanda Allen
Jeff Cushingberry
Deja Vasquez
Pulaski Vickers

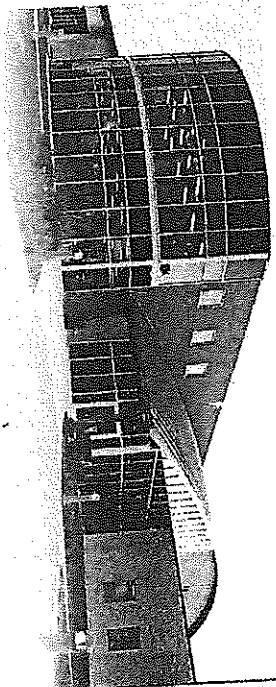
• **Park Commissioner:**
Lawrence Cochran Jr.

Dennis King
Nykolus Martin
Mike Ramey

Cassondra Respress
Latricia Wilbourn
Armond Respress (WRITE IN)

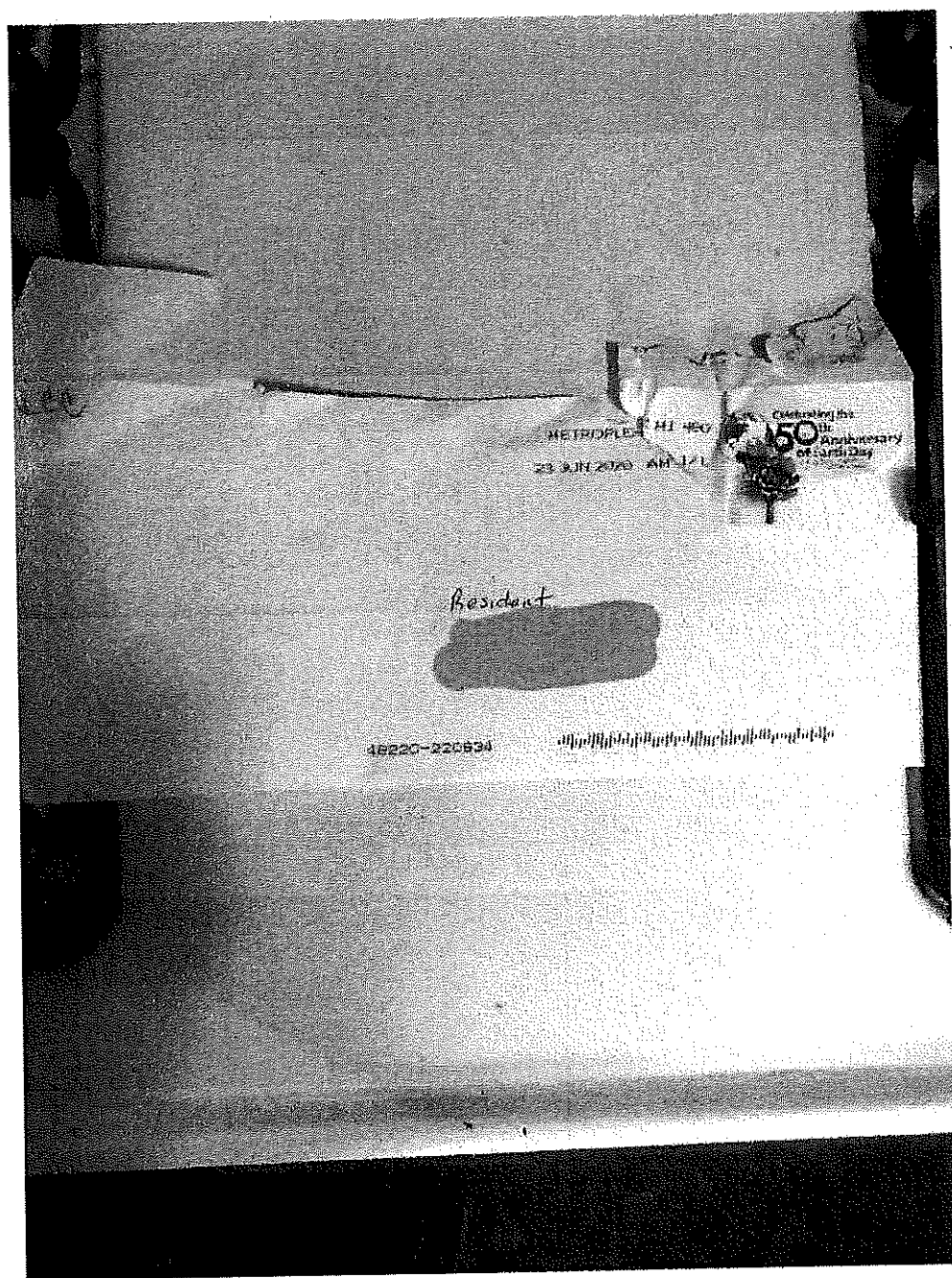
VOTE NO ON PROPOSAL R

Back



COMING SOON!
NEW RECREATION CENTER IN
2021

427 0 J 華 日 田 8 9 SG. 1351.



BLACK COMMUNITIES MATTER ARAB MAN GET YOU KNEE OFF OUR NECK

You are still coming at this community with lies you are sending in the mail about jobs and big salaries for your weed company you know it is a lie. What is fact:

- You lost the last election by a large margin that voted **NO** in May 2019.
- You have and still are paying your airhead worker bees and puppets tuition, taxes, legal fees and other favors if they perform your will. It is sad to see residents on your payroll and a couple of outsiders. But money talks. People sell there sole to the devil for money like Karen Ballard who crossed over to you.
- You are paying \$10-\$20 for resident's vote starting with the senior building on Wyoming. Don't think these people are not smart. Are you not a shame?
- You circulated information that the Board of Trustees are for you and your company and signed a agreement which is a LIE. **NO AGREEMENT HAS BEEN MADE with the board.** Residents do not want it and it is okay. So go away you bad man! You have been asked to move it to your community but your community do not want it.
- You have put together some of your airhead puppets to run against the current board so you can have control of the community. Be for real. The group below is born and raised

RESIDENTS TAKE HEED! HERE IS YOUR LIST TO VOTE FOR! REAL PEOPLE THAT CARE!

Supervisor – Donna Squalls

Faye Snider-Gibson - Park Commissioner

Treasurer – Patricia Singley

D. Ramey - Park Commissioner

Clerk – Gwendolyn Turner

Cassandra Repress – Park Commissioner

Wanda Allen – Trustee

Armond Respress – Park Commissioner(Write in his name)

Kim S. Tillery – Trustee

Richard S. Miles – Trustee (Write-In his name)

Deja or Pulaski – Trustee (I know the Vickers) This other person is related to the enemy (Mongos)

I was born and raised in this community, will not let you take advantage and we can find a way for you to use your money other than disrupting black lives. This community has history. Majority Good! We do not need to add to the bad so you can make \$\$\$\$\$\$\$\$ for you.

RESIDENTS – VOTE NO ON PROPOSAL R – BLACK COMMUNITIES MATTER

Paid for by the United Concern Citizens of Royal Oak Township to Elect the above and Vote NO on Proposal R



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

January 26, 2021

Donna Squalls
21241 Westview Ave
Ferndale, MI 48220

Re: *Smith v. Squalls*
Campaign Finance Complaint
No. 2020-11-199-47

Dear Ms. Squalls:

The Department of State (Department) received a formal complaint filed by Virgil Smith against you alleging that you violated the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.201 *et seq.* A copy of the complaint and supporting documentation is enclosed with this letter.

Section 24 requires committees to file a statement of organization with the proper filing official within 10 days after the committee is formed. MCL 169.224(1). Section 24 details specific requirements for all statement of organizations that must be filed. See MCL 169.224(2)-(3). A person who fails to file a statement of organization shall pay a late filing fee of \$10.00 per business day the report isn't filed not to exceed \$300. MCL 169.224(1). A person failing to file a statement of organization after 30 days, is guilty of a misdemeanor punishable by a fine up to \$1,000.

The MCFA requires candidates and committees file contributions and expenditures with the appropriate filing official by specific dates. MCL 169.233(1) – (3). The MCFA requires a committee that receives or expends more than \$1,000 during any election to file campaign finance reports in compliance with the Act. MCL 169.233(6). A person who knowingly omits or underreports expenditures required to be disclosed by the Act is subject to a civil fine of not more than \$1,000 or the amount of the expenditures omitted or underreported, whichever is greater. MCL 169.233(11).

The 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).

Mr. Smith alleges that you failed to register a committee, failed to file reports, and published campaign materials that failed to contain a proper paid for by statement.

Donna Squalls
January 26, 2021
Page 2

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.* The investigatory process is more fully explained in the attached manual.

If you wish to file a written response to this complaint, you are required to do so within 15 business days of the date of this letter. Your response may include any written statement or additional documentary evidence you wish to submit. All materials must be sent to the Department of State, Bureau of Elections, Richard H. Austin Building, 1st Floor, 430 West Allegan Street, Lansing, Michigan 48918. If you fail to submit a response, the Department will render a decision based on the evidence furnished by the complainant.

A copy of your answer will be provided to Mr. Smith, who will have an opportunity to submit a rebuttal statement to the Department. After reviewing all of the statements and materials provided by the parties, the Department will determine whether "there may be reason to believe that a violation of [the MCFA] has occurred [.]". MCL 169.215(10). Note that the Department's enforcement powers include the possibility of entering a conciliation agreement, conducting an administrative hearing, or referring this matter to the Attorney General for enforcement of the penalty provided in section 33(11) of the Act.

If you have any questions concerning this matter, you may contact me at (517) 335-3234.

Sincerely,



Adam Fracassi
Bureau of Elections
Michigan Department of State

c: Virgil Smith

REC'D - CIVIL
FEDERAL DEPT OF STATE

APR 30 AM 11:11

DO NOT WRITE ON THIS

A handwritten signature or set of initials, possibly 'AA', written in dark ink.

Donna Squalls
21241 Westview
Ferndale MI 48220
(248) 541-4112

February 27, 2021

Mr. Fracassi,

This letter serves as my formal response to the allegations brought forth by Virgil Smith. First, let me thank you for allowing an extension to reply to these allegations.

The **ADDENDUM's** very first sentence contains false information and is incorrect. I have not been serving as supervisor for over 20 years. I did serve two consecutive terms as a Trustee (four years each term, 8 years total) and I served two consecutive terms as Supervisor (8 years total). I am in the third month of my third term as Supervisor.

Secondly, I have complete respect for every aspect of the law and have no past criminal record. I would not knowingly commit any of the violations set forth by Virgil. You should be aware that Mr. Smith has engaged in an ongoing onslaught of harassment and overt hostility against me, to the point of being extreme, nefarious and personally troubling. I will address this later in my response.

Allegation 1.) I was not aware of the name disclosure requirement. Had I been aware, I would have printed the information at the bottom of the signs I created. I know nothing about other signs. The omission was not intentional. I am aware now but had not seen a history of any campaign signs in the very small township having a history of the information being printed. The campaign signs completed by other candidates in this very small community had no history of the required information, this of course, will be rectified on a going forward basis. This was regretfully an unintentional omission.

Allegation 2.) Regarding the two different sets of yards signs, please note that the first set of yard signs showing in his illustration are signs from my 2016 campaign and consisted of 30 yard signs which were stored in my basement. I reused those signs during the most recent campaign to place in people's yards. On two consecutive nights after they were placed, every one of my yard signs disappeared from the residents' yards. The residents were upset that someone had entered their property and stole their signs in the middle of the night.

Consequently, I had to purchase new yard signs in 2020. I did not want to purchase many signs because there were only a few days left in the campaign before the primary election. On July 30, 2020, I purchased 20-yard signs and I also bought 250 additional cards to pass out at the polls. I have attached the receipt for that. Exhibit A

I have also attached the receipts showing the purchase of the "Vote Democrat" cards as well as the receipt from the campaign flyers. There were several of us who made a collage of campaign material to cut costs. We paid 85.00 each. I received a check from Pulaski Vickers, and Deja Vasquez sent her \$85.00 through cash app and everyone else paid with cash. Exhibit B It was well under the \$1,000 limit. Mr. Smith's allegation to the contrary is entirely contrived and pure speculation and without any foundation.

Virgil Smith's theft - The evening before the election Virgil Smith was caught red handed by a Township DPW worker stealing a "Vote No" sign out of a yard. The DPW worker told him "I know you are not supposed to be doing that." We completed a police report but I could not press charges because that "Vote No"

sign did not belong to me. I found out the signs belonged to a group of seniors in the Township. They did not want to press charges.

Allegation 3.) I absolutely did not put any information out in the community about voting on a proposal. There were many residents who were strongly against marijuana coming into our community. Further, there were groups of individuals formed to protest marijuana in the community. The first election resulted in the proposal being voted down 72%. The second election resulted in it being voted down 63%. Virgil Smith is an advocate of Marijuana in the Township at any cost and has resorted to doing everything in his power to attack opposition. This current complaint to you is but the latest example of his dirty tricks.

He seems to believe that I single handedly ran a campaign against marijuana in our community as if no one else had a voice. They have consistently shown they want to punish me for the community not wanting marijuana in it. The people in the community have very strong feelings about this issue, yet I have been targeted because of the marijuana being voted down. I would not jeopardize my position as Supervisor putting out literature against something on a ballot. Also, the last two "vote no" signs do not look as if they were put in someone's yard. They look as if they were created for this purpose, to put in this complaint. Exhibit C

Allegation 4.) The same answer as before. It is not me!

Allegation 5.) The campaign flyer with the front and back were placed into the community by the Park Commissioners who were campaigning. When I saw the picture that they depicted, with a new recreation center, I was very disturbed. We could never build a building of that magnitude. Our community is too small for such a large recreation center. I would not deceive our residents and I had no knowledge, input or responsibility for that.

Additional Considerations

If you do not mind, I would like to address a couple of encounters I have had with Virgil Smith. This will show that these allegations are simply nothing but another personal attack by Virgil Smith against me. Regretfully, this has become a personal attack against me and the parties involved appear to have chosen this tactic against me, because the will of the people voted against their marijuana interests in the township.

1. I have attached recall petitions that show how they have tried to recall me twice as Supervisor. It all begins with marijuana. The petitions were brought up against me by a woman named Laquita Bartley, but Virgil Smith escorted her to the hearings each time. Exhibit D.
2. In August of 2018, I had to file for a **Personal Protection Order** against Virgil Smith. I have also included the supporting documentation regarding that. Mr. Smith attempted to physically assault me after a meeting and but not for a gentleman who I know only by the first name Ottist, I believe he would have attacked me. I pursued charges but In Oakland County there must be two occurrences for a judge to issue a PPO. Judge Hultgren did state he would keep the case open and if I have another occurrence, come to the courthouse, and fill out the paperwork and he will issue a PPO. Exhibit E
3. In November of 2019, a resident came to me and told me she had seen Virgil Smith and Trustee Karen Ballard at Outback Steakhouse together in Oak Park, Michigan. Exactly one week later the most horrific 6-page pamphlet was mailed to the homes of Royal Oak Township about my family-owned business. It was signed by no other than Trustee Ballard. The pamphlet accused me of not paying personal, property and income taxes. I was accused of not being properly being zoned and illegally purchasing tobacco. The Michigan Department of Treasury and the Bureau of Tobacco came to my business of 72 years, established in 1949, and checked all tax records and receipts for tobacco products and found no violations. I have been vindicated. Exhibit F
4. In 2020, Michigan Health and Wellness Center, LLC, whom Virgil Smith is employed with, filed several complaints against Royal Oak Township and me in the Oakland County Circuit Court. I was also vindicated in all those allegations as well. Exhibit G
5. Just as recent as a couple of months ago, I was reported to the Michigan State Lottery for selling tickets out of a garage. That is the description that group of people call my family-owned store. The lottery reported they got a kick out of this as my business is older than the Michigan State Lottery. They also stated they were aware the accusations were politically motivated.
6. Now I am being charged with campaign finance allegations. Throughout the past three years I have been reported to every department in within the State of Michigan. I been nothing but harassed by this business and its employee Virgil Smith. And these allegations of disregarding the Michigan Campaign Finance Act are just some of the same harassment that they have allowed to become personal against me. They have no basis, as I did nothing knowingly or intentionally.

Thank you for your consideration and I am hopeful that I had adequately responded to the allegations. I would be happy to address any follow up questions you may have.

Sincerely,

A handwritten signature in blue ink that reads "Donna Squalls". The signature is written in a cursive style with a large, looped initial "D".

Donna Squalls,

Supervisor, Charter Township of Royal Oak

EXHIBIT A



Order Form

PRINT@DOORSTEP.COM
(248) 470-9567

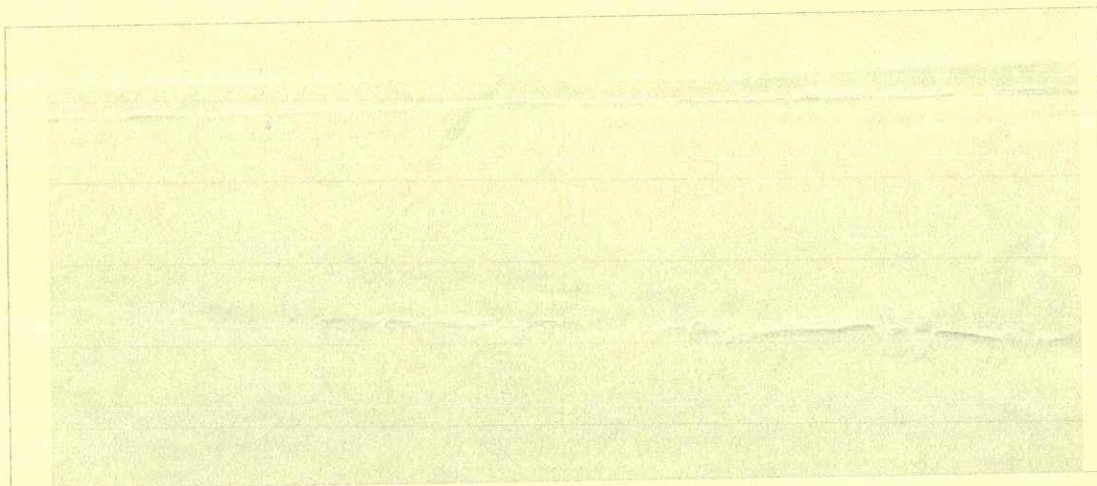
Date: 7-28-20

Due Date: 7-30-20

NAME: Dorinda CONTACT#: 248.376.0220

EMAIL: _____

20	yard	sign / double sided	\$11.50	\$15.00
20	sides			
250	4x6		\$55	
		Layout	\$55	



	\$410
cc	\$205
13cl	\$205

SIGNATURE: _____ DATE: _____

Please read your proof three times before approving. Make sure all information is correct. Once the printing process begins, it cannot be reversed. Any errors, typo's, or issues of any kind will be at your cost. Please ensure that your project is perfect!! Print-ready artwork must be submitted at a print-ready resolution and CMKY color mode. **THERE ARE NO REFUNDS FOR ANY REASON.**

EXHIBIT B

Election Cards

From: Donna Squalls (squallsgroc@yahoo.com)
To: printdetroit@gmail.com
Date: Wednesday, October 28, 2020, 02:03 PM EDT

Hello Carlos,

I would like to have about 300 4x4 cards made. On one side I need the cards to say VOTE DEMOCRAT 2020. The other side would say Re-Elect Donna Squalls for Supervisor. Can I get these by the weekend?

Thank you,
Donna Squalls



INVOICE

Doorstep Printing
7300 West Seven Mile Road
Detroit, MI 48221
United States

248.470.9567
doorstepprinting.com

BILL TO
Donna Squalls
Donna Squalls

2483760820
squallsgroc@yahoo.com

Invoice Number: 2628
Invoice Date: October 29, 2020
Payment Due: October 29, 2020
Amount Due (USD): \$116.59

Items	Quantity	Price	Amount
250 4x4 Flyers	1	\$34.99	\$34.99
Design fee	1	\$75.00	\$75.00
Subtotal:			\$109.99
Michigan 6% (82-1522046):			\$6.60
Total:			\$116.59
Amount Due (USD) :			\$116.59

Notes / Terms

Please read your proof three times before approving. Make sure all information is correct, once the printing process begins, It cannot be reversed. Any errors, typo's or issues of any kind will be at your cost. Take your time to ensure your project is perfect!! Print-ready artwork must be submitted at a print-ready resolution and CMYK color mode. There are no refunds for any reason.



INVOICE

Printing and Marketing Services

1325 EAST 11 MILE ROAD

ROYAL OAK, MI 48067

(248) 549-4434 • FAX (248) 549-7740

E-MAIL: orders@sirspeedyro.com

Donna Squalls

Donna Squalls

Phone: (248) 376-0820

Fax: squalsgroc@yahoo.com

61720

Date

6/16/20

Customer P.O. No.

PLEASE PAY FROM THIS INVOICE

QUANTITY

DESCRIPTION

AMOUNT

500

Campaign Flyers - Collate & Staple in Upper Left Corner, 8.5 x 11 White 60# Offset
Husky, 7 originals, Full Color 2 up on 1 side

565.39

Sales Rep:
Taken by: Sue
Account Type: COD

Ship Via: Call
Wanted: Fri 6/19
Campaign Flyers

PAID
JUN 22 2020
SIR SPEEDY

SUBTOTAL

565.39

TAX

33.92

SHIPPING

TOTAL

599.31

AMT. DUE

599.31

AN INDEPENDENTLY OWNED AND OPERATED FRANCHISE OF SIR SPEEDY

SERVICES AVAILABLE:

- 4-Color Offset Printing
- Color Copying from Original or Your Digital File
- PC & Mac Capabilities
- Graphic Design & Typesetting
- High Speed Copying
- Multi-part Carbonless Forms
- Business/Personal Stationery & Envelopes
- Mailing Services
 - ▶ Stuffing/Sealing/Labeling
 - ▶ Direct Imprint
 - ▶ Postal Discounts
- Complete Bindery Services
- Laminating
- GBC & Spiral Binding
- Fullfillment & Warehousing
- Promotional Items & Advertising Specialties
- Posters, Banners & Signs

☐ ORIGINALS RETURNED

☐ DISK(S) RETURNED

___ TOTAL BOXES DELIVERED

PLEASE PAY ALL REMITTANCES TO THE ADDRESS
IN THE UPPER LEFT CORNER OF THIS FORM.

RECEIVED BY _____

DATE _____

PAID BY: CASH _____ CHECK # _____

CHARGE MC 107199 _____ OTHER _____

Sir Speedy Centers' prices are calculated on a "cash with order" basis. Therefore, all orders are on 'COD' cash on delivery basis, unless credit is already established by an acknowledged credit application. Terms on established credit accounts: Net on presentation. Balances unpaid after 15 days from date of invoice are subject to a service charge of 2% per month, or maximum allowed by law, if different, together with expenses incidental to collection, including reasonable attorney's fees.

216 SPEEDWAY # 63170 ROYAL
1925 EAST 111 MILE ROAD
ROYAL OAK, MI 48067

DATE: 05/22/90 TIME: 09:55:00
MEMO: 00005000016 JUNK: 0940 TERM: 0001
C-A-L-E-S O-A-R-A-F-T

REF: 2000
BATCH: 895
CD TYPE: MC
TR TYPE: HP
ENTER INVOICE #: 61720

TOTAL: \$599.31H

REC: *****4079 EXP: 03/93
AP: 127199 AYS: EXACT BATCH
TRAN ID: B622NDJSTH090 AUDIT: CA 00
VAILD CO:
V-CODE BATCH

CARDHOLDER ACKNOWLEDGES RECEIPT OF
GOODS AND/OR SERVICES IN THE AMOUNT OF
THE TOTAL SHOWN HEREON AND AGREES TO
PERFORM THE OBLIGATIONS SET FORTH BY THE
CARDHOLDER'S AGREEMENT WITH THE ISSUER

DOUGLAS
TOP COPY-MERCHANT BOTTOM COPY-CUSTOMER

ROYAL OAK TOWNSHIP SUPERVISOR

Fellow Residents and Citizens, I am honored and proud to have served and represented you as Supervisor over the past 8 years. I am excited because great things are happening for us. Where we were unnoticed by the State of Michigan, we are now being recognized and respected. That is because of you, the citizens, of Royal Oak Township. I would like to continue this exciting journey with you.



For the first time ever, we've been awarded over 2,000,000 in grants toward the water infrastructure project as well as an additional 300,000 to assist in other Township projects and operations. We've improved our relationship with our neighboring communities and have developed a strong association with Oakland County. I've been a part of the Township's first ever *Capital Improvement Plan*. I've also been involved in renegotiating the union contract for the first time in 20 years and we've updated the personnel and policy manual as well as our accounting manual.

We now have a Key Site Development Plan and a Roadway Plan which will be implemented in 2021.

For the first time in 30 years we have a new planning firm, and for the first time in 20 years we have entered into a new relationship with a different banking institution which has proven to be of a better financial benefit for Royal Oak Township.

I was instrumental in getting the former Royal Inn closed, which was a blight and adverse to the development and growth that the township is working towards.

We are currently in our *demolition phase* as we *prepare for new development* and I am very proud to be a part of one of the most important projects Royal Oak Township will have - Our New Municipal Center.

I am a lifelong resident and I know the tight-knit community we are and have always been. I will continue as I always have, to be dedicated and work hard toward successful growth and progress for you, the citizens, while maintaining our close knit community atmosphere.

It is time for growth and progress in the community but not time for change in the leadership that has worked so hard for that growth. Please allow me the honor to continue to serve you as we work toward POSITIVE continued growth and progress.

RE-ELECT DONNA SQUALLS FOR TOWNSHIP SUPERVISOR

**ELECT
PULASKI VICKERS FOR TOWNSHIP
TRUSTEE**



My family moved to Royal Oak Township 70 years ago on the very day of my birth, June 17, 1950. We have maintained our residence in the township since that time. I'm a graduate of Michigan State University - Class of 1972. I moved to San Diego, California in 1973 where I retired as a liability claims adjuster from Wawanesa Insurance Company. In April of 2016 I moved back to Royal Oak Township to assist with my 96 year old mother's daily care. I found myself once again enjoying the very safe and secure lifestyle that has always been here in the township. Road repairs in the community are my Top Priority!

Vasquez for Royal Oak Township Trustee 2020



Deja Vasquez is a proud product of Royal Oak Township. She spent her childhood at her grandmother (Mongo Family) and aunt's (Way Family) homes where she first developed her love and passion for "The Township". Vasquez moved back six years ago to raise her family in the quant hometown she remembered as a child. Vasquez contributes her achievements, ethics, and integrity to the positive experiences, influences, safety, and love she received growing up in Royal Oak Township.

Vasquez knows she has the experience, education, and ethics to be a great Trustee for the citizens of Royal Oak Township. She has dedicated her life to serving her community and empowering our youth. She has 8 years of experience as a Civil Servant Employee and received her bachelor's degree from Oakland University. Vasquez is an active volunteer in the community. She has coached cheer in the recreation center and is heavily involved with our Sports Academy- Motown DreamTeam. Vasquez has recently taken on a new role of Girls Youth Mentoring Coach with the recreation center. Vasquez is currently in her last year of law school and plans to use her law degree to better our community.

As a current resident of Royal Oak Township, Vasquez has a desire to bring resources to the community, empower the youth, hold businesses to higher standards and accountability, and become a bridge of communication between the Board of Trustee's and the community. Vasquez knows there is no place better than Royal Oak Township, therefore we must hold on to it and hold on tight!

A Vote for Vasquez is a Vote for YOU!!

My name is Wanda Allen. I'm a life-long resident of Royal Oak Township. I raised my family in the Oakdale Co-op where I rented for 22 years and in 1998 I became a proud homeowner.

Education: I received my formal education at George Washington Carver elementary school and I am a high school graduate of Oak Park High. I furthered my education by taking courses at Oakland University and The Detroit Institute of Technology. I also attended Michigan Paraprofessional where I received my EKG certification and School Craft College where I earned a certification in Criminal Justice.

Work History: I was a dedicated employee in the automotive industry for 30 years with the Big 3. I was UAW representative for 3 years before retiring. I also was employed with the Royal Oak Twp Police & Fire department for 4 years. In 2018 I sat on the zoning board for the Royal Oak Township and in 2019 I was appointed a seat on the planning committee for Royal Oak Township.

With my educational background, work history and time as a resident within the Royal Oak Township, I feel that I have a lot of ideas, information and knowledge that I can bring to the table. I have a lot of interest in my community and take pride in helping to make the community a better place for us to live. I look forward to being on the board of Royal Oak Township and it would be my pleasure to receive your vote for Trustee this coming election.



August 4, 2020

WRITE-IN

Candidate
Richard Miles



for
Royal Oak TOWNSHIP
TRUSTEE

No Hidden Agenda, No Strings Attached
A Trustee you can Trust

Paid for by the committee to RE-ELECT Richard Miles: rmiles@royaloaktwp.com

RE-ELECT

Hello residents of Royal Oak Township, my name is Armond Respress. I was born and raised in Royal Oak Township. I've been a Park and Recreation Commissioner for 16 years and I am up for RE-ELECTION. My mother, Carolyn (Kaye/K-K) Ramey instilled in me the importance of representing my community with pride and integrity.

I've had the privilege of working with so many great Organizations over the years, the Motown Dream team (member), the E-Dash Girls, the Royal Oak Township Browns, the Kemetic Youth Foundation (member), and many more. We have put together an award ceremony honoring our elders. We've had computer classes that provided jobs for our youth and elders, poetry nights, the Women's Modern Village Collective, Community Garden and more. I am here to improve our Community and to make sure our youth have programs in place that help them receive scholarships and job training.

WRITE IN ARMOND RESPRESS

PARK COMMISSIONER





**CANDIDATE FOR TREASURER
OF CHARTER TWP OF ROYAL OAK**

PATRICIA SINGLEY is a longtime resident of Royal Oak Twp., wife, mother and grandmother who will bring a lifetime of business and accounting experience to the office of Treasurer.

My career experience is accounting and financial services with major corporations for many years

Served as Treasurer of Charter Twp. of Royal Oak from 1994 – 1995.

Royal Oak Twp. Is on path for improving quality of life for its residents. This is a historical community that deserves to continue on that path with positive choices and administrative decisions.

EXHIBIT C

Canvass Results

Canvass Results

Run Time

8:33 AM

Run Date

05/07/2019

Oakland County, Michigan

Special Election, Tuesday, May 7, 2019

5/7/2019

Page 2 of 7

Official results

Registered Voters

13287 of 10820 = 12.15 %

Precincts Reporting

20 of 54 = 37.04 %

Proposal 1 - Royal Oak Township

Precinct	Yes	No	Cast Votes	Undervotes	Overvotes	Rejected write-in votes	Unresolved write-in votes	Precinct Ballots Cast	Absentee Ballots Cast	Total Ballots Cast	Registered Voters	Turnout Percentage
Royal Oak Township, Precinct 1	73	102	175	0	0	0	0	109	66	175	1475	11.86 %
Royal Oak Township, Precinct 2	38	164	202	0	0	0	0	149	53	202	1107	18.25 %
Totals	111	266	377	0	0	0	0	258	119	377	2582	14.60 %

Canvass Results

Canvassed Results

Run Time 8:09 AM
Run Date 08/19/2020

Oakland County, Michigan

Primary Election, Tuesday, August 4, 2020

8/4/2020

Page 743

Official Results

Registered Voters 370035 of 995114 = 37.19%
Precincts Reporting 506 of 508 = 100.00%

Proposal R - Royal Oak Township - Nonpartisan Party

Precinct	Yes	No	Cast Votes	Undervotes	Overvotes	Rejected write-in votes	Unresolved write-in votes	Precinct Ballots Cast	Absentee Ballots Cast	Total Ballots Cast	Registered Voters	Turnout Percentage
1 Royal Oak Township, Precinct	140	161	301	94	0	0	0	223	172	395	1,458	27.09%
2 Royal Oak Township, Precinct	99	215	314	74	0	0	0	246	142	388	1,125	34.49%
Totals	239	376	615	168	0	0	0	469	314	783	2,583	30.31%

EXHIBIT D

INSTRUCTIONS ON REVERSE SIDE

RECALL PETITION

We, the undersigned registered and qualified voters of the ☒ City of Royal Oak and State of Michigan, petition for the recall of an election to recall Donna J. Squalls (Name of Officer) from the office of Township Supervisor (Title of Office) for the following reason(s):
 Supervisor Donna Squalls prevented a member of the public from speaking during the public comments portion of the agenda at a meeting of the Township Trustee Board on May 10, 2018, prior to the Board going into closed session.

FOR CLERK'S USE ONLY

WARNING - A PERSON WHO KNOWINGLY SIGNS A RECALL PETITION MORE THAN ONCE OR SIGNS A NAME OTHER THAN HIS OR HER OWN IS VIOLATING THE PROVISIONS OF THE MICHIGAN ELECTION LAW.

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CERTIFICATE OF CIRCULATOR

The undersigned circulator of the above petition asserts that he or she is 18 years of age or older and a United States citizen; that each signature on the petition was signed in his or her presence and was not obtained through fraud, deceit or misrepresentation; that he or she has neither caused nor permitted a person to sign the petition more than once and has no knowledge of a person signing the petition more than once; and that, to the best of his or her knowledge and belief, each signature is the genuine signature of the person purporting to sign the petition, and the elector was qualified to sign the petition.

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CIRCULATOR — DO NOT SIGN OR DATE CERTIFICATE UNTIL AFTER CIRCULATING PETITION.

(Signature of Circulator) _____ (Date) _____

(Printed Name of Circulator) _____

(Complete Residence Address (Street and Number or Rural Route)) - [Do not enter a post office box] _____

(City or Township, State, Zip Code) _____

(County of Registration, if registered to vote, of a Circulator who is not a Resident of Michigan) _____

INSTRUCTIONS ON REVERSE SIDE

RECALL PETITION

We, the undersigned registered and qualified voters of the ☐ City ☐ Township ☐ Village of Royal Oak, in the County of Oakland and State of Michigan, petition for the calling of an election to recall Donna J. Squalls (Name of Officer) from the office of Township Supervisor (Title of Office) (District, if Any) for the following reason(s):
 Supervisor Donna Squalls refused to place an opt-in vote regarding medical marijuana on the May 10th Township Trustee meeting agenda
 for the Township Trustee Board to consider despite receiving several written requests from residents to do so.

FOR CLERK'S USE ONLY

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INSTRUCTIONS ON REVERSE SIDE

RECALL PETITION

We, the undersigned registered and qualified voters of the ☐ City ☐ Township ☐ Village of ☐ Precinct ☐ }
 calling of an election to recall Donna J. Squalls (Name of Officer) from the office of Royal Oak Township Supervisor (Title of Office) Oakland and State of Michigan, petition for the following reason(s):
 Supervisor Donna Squalls refused to place an opt-in vote regarding medical marijuana on the June 14th Township Trustee meeting agenda for the Township Trustee Board to consider despite receiving several written requests from residents to do so.

FOR CLERK'S USE ONLY

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 PRINTING SYSTEMS • TMLOR, MI • 1-800-85-12345 • FORM APPROVED BY DIRECTOR OF ELECTIONS, STATE OF MICHIGAN

INSTRUCTIONS ON REVERSE SIDE

RECALL PETITION

We, the undersigned registered and qualified voters of the ☐ City ☒ Township ☐ Village of Royal Oak, in the County of Oakland and State of Michigan, petition for the calling of an election to recall Donna J. Squalls (Name of Officer) from the office of Township Supervisor (Title of Office) (District, if Any) for the following reason(s):
Supervisor Donna Squalls added an item to the agenda on June 14, 2018 to approve a contract with the Michigan Department of Transportation even though the contract did not have a current term and did not identify the amount of money the Township would receive for cutting the grass on the Eight Mile Road Median.

FOR CLERK'S USE ONLY

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County of Registration, if Registered to Vote, or a Circulator who is not a Resident of Michigan: _____

INSTRUCTIONS ON REVERSE SIDE

RECALL PETITION

We, the undersigned registered and qualified voters of the ☐ City ☐ Township ☐ Village of ☐ Precinct of _____, from the office of _____, in the County of _____, and State of Michigan, petition for the calling of an election to recall _____ (Name of Officer) _____ (Title of Officer) _____ (District, if Any) for the following reason(s):
Supervisor Donna Squalls owns and operates a store located at 21241 Westview Ferndale MI 48220 that does not conform to township zoning laws.

FOR CLERK'S USE ONLY
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EXHIBIT F

ENCLOSED IS A LETTER FOR YOUR
REVIEW THAT WAS SENT TO THE
STATE TREASURER AND THE
ATTORNEY GENERAL BY TWO OF
OUR DISTINGUISHED TOWNSHIP
TRUSTEES ALLEGING MISUSE OF
PUBLIC FUNDS, NEGLECT OF
DUTY, AND OTHER ALLEGATIONS
BY THE SUPERVISOR, DONNA
SQUALLS.

**PLEASE COME
TO THE NEXT
SCHEDULED
BOARD MEETING**

**DECEMBER 12TH AT 6:30PM
TO VOICE YOUR CONCERNS**

From The Desk of Charter Township of Royal Oak
Trustee Karen D. Ballard



November 13, 2019

Rachael Eubanks, Treasurer
State of Michigan
Department of Treasury
Richard H. Austin Building
430 West Allegan Street
Lansing, Michigan 48922

Re: Requesting a Forensic Audit of the Charter Township of Royal Oak Treasury Office and Supervisor Office

Greetings Ms. Eubanks,

I am writing to request a Forensic Audit of the Charter Township of Royal Oak - Treasury Office and Supervisor Office and voice my deep concerns that I have regarding the Charter Township of Royal Oak Supervisor, Donna Squalls. I believe there has been a misappropriation of funds, misuse of public funds, misconduct in office, and I believe her actions constitute a breach of public trust. Her actions may amount to criminal activity. I have long held concerns about our Township's Supervisor, and I am asking for the Treasury Department's intervention to look further into these financial improprieties.

Misuse of Public Funds

In March of 2017, Royal Oak Township was awarded a grant by the Michigan Department of Treasury in the amount of \$500,000 for a Water Delivery System Rehabilitation Project. Based on my information, I believe that this money was not used by the Supervisor Squalls for the intended grant purpose. The Supervisor has hidden the information from the Township Trustees regarding this issue and does not explain where these funds have gone. I do not know how Supervisor Squalls has been allocating funds and managing tax dollars. Instead of operating in front of the public body, Ms. Squalls instead openly violates the open meetings act and operates like a self-appointed dictator in the dark. Royal Oak Township is again facing more budget issues, and she is managing our funds and tax dollars in an extremely poor fashion.

When our 2018 budget was crafted and approved, the Township had no money allocated for capital improvements. In the summer of 2018, our board voted in favor of a matching grant from the Michigan State Department of Natural Resources for capital improvements for our recreation center, which is badly needed. Supervisor Squalls called a special meeting a couple weeks later and a vote was taken to rescind the initial board approval of the matching grant (I was not in attendance at that special meeting). We later received an amended 2018 budget showing \$1,020,000 that appears on the line item showing funds received from the federal and state government for capital improvements. I became aware of this only because we had to vote on the amended budget. Supervisor Squalls then made claims over the next several months that we had

enough money in our general fund and were planning to break ground on a new recreational center and a new municipal center in the spring of 2019. The Township Board of Trustees voted to pay Hamilton Anderson Architectural Design Firm over \$10,000 to create architectural drawings. To this date we still have not broken ground or seen plans or any architectural drawings. Where did this money go? How did it appear and then disappear from our budget? Did Supervisor Squalls put out a false budget so she can make false claims? This needs to be investigated further.

Currently, as I understand things, we do have a Memorandum of Understanding (MOU) for police protection, it is provided free of charge to the township by the Michigan State Police. In 2017 our budget showed that our police fund had a beginning balance of \$1,060,805, with expenditures totaling \$69,310 and an ending balance of \$991,495. In 2018 our budget shows our beginning fund balance for the police fund at \$1,021,516, interesting note, (Royal Oak Township voted to end the tax levied for police protection in 2016); expenditures of \$75,874, and an ending balance of \$945,642. Our 2019 budget show that our police fund balance \$1,008,531 dollars with expenditures totaling \$74,336 and an ending balance of \$934,195. These numbers do not add up and do not make sense to me.

In June of 2018, a recall petition was filed against the supervisor. When the election commission met, Supervisor Squalls was personally represented at the meeting by township attorney Michael Bosnic of Giamarco, Mullins & Horton. When the matter was later appealed to Oakland County Circuit Court, he again represented Supervisor Squalls. He also represented her in the Michigan Court of Appeals. I believe that the supervisor directed Mr. Bosnic to either bill the Township for his services in her personal matter or intimidated him into giving his legal services to her for free by calling into question or cancelling his firms contract with the township. As a township board, we never reviewed any notice of this conflict of interest and were never asked to sign a conflict waiver to allow for that representation.

In November of 2018 Royal Oak Township hired Tony DeBardelaben as our Township Manager. The Township Manager's duties are detailed in the "Charter Township Act of 1947". Supervisor Squalls has her own duties and responsibilities but wanted the Manager to fulfill her statutorily assigned duties for her. Mr. DeBardelaben made it clear to the Supervisor that he is a function of the Township Board and that he would not preform her responsibilities. Supervisor Squalls then made false claims of sexual harassment, yet never filed anything to the Board or Michigan State Police and placed Mr. DeBardelaben on an unauthorized / illegal sanction paid administrative leave without Board approval, which was of great detriment and cost to the Township. Supervisor Squalls made an attempt to fire Mr. DeBardelaben but the Board of Trustees brought him back to work. To my surprise Treasurer Cynthia Phillips presented a resolution to the Township Board of Trustees at our regularly scheduled Trustee Board meeting in October of 2019 this year that stated that Mr. DeBardelaben was terminated for No Cause. The Board then voted to terminate Mr. DeBardelaben with four (4) votes in favor, two (2) votes opposed, with myself voting in opposition, and one (1) Trustee absent.

Neglect of Duty

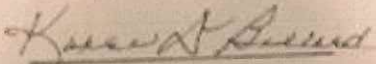
It is of my personal knowledge that Supervisor Squalls is not putting in the required hours as Supervisor of the Township. The Supervisor is a paid elected position, and has listed office hours totaling to 10.5 hours a week. Instead, Supervisor Squalls will not show up or will close her office early. This is of great harm to the citizens who rely on the Supervisor to be there during her required hours. The Supervisor pockets the salary and instead of doing her sworn duty, Ms. Squalls would rather focus on working at her party store. The Supervisor is effectively neglecting her duties to the residents of our Township by not fulfilling her commitments to the office.

Other Allegations

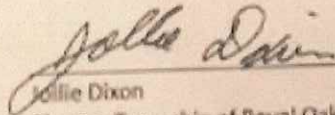
I have personal knowledge that the Supervisor currently operates an illegal convenience store out of the garage of her house. This store sells cigarettes and tobacco products, lottery tickets, hot food among other items. This is a full convenience store that is a commercial business whereas the property is listed as a residential property. This store is blatantly illegal, but as the person who oversees the Public Works Department and the Building and Code Enforcement Department how can she be held accountable for her actions? I do not believe that a residential garage could possibly be up to the code required for a commercial convenience store. Because this store is illegal, it fails to pay the Township its proper taxes. This further proves that the Supervisor is using her office to create her own personal gain, while depriving the community of the proper tax revenues and fees a business would generate. Is this store where the Supervisor is spending the time that she is supposed to be spending working for the Township? Possibly. The Supervisor tried to spot zone her residential lot and make it a commercial lot while we were revamping our master plan this year. This, I also believe, constitutes misconduct in office, a breach of public trust and usage of the office to create personal gain.

In closing, I hope and pray that your office can look further into these deeply troubling items by investigating and auditing our books. Doing so would greatly help the citizens of Royal Oak Township. Residents should know where its money has gone and how the supervisor has been spending it. In sending this letter, I hope that the Michigan Department of Treasury can take a deeper look and help us to gain better knowledge of how our supervisor has been operating.

Respectfully submitted,



Karen D. Ballard
Charter Township of Royal Oak
Board of Trustee Member



Jollie Dixon
Charter Township of Royal Oak
Board of Trustee Member

Cc.

Joyce Parker
Deputy State Treasurer
State/Local Finance
Richard H. Austin Building
430 West Allegan Street
Lansing, MI 48922

State Senator
Jeremy Moss
District 11
6400 Binsfeld Bldg.
201 Townsend St
Lansing, MI 48933

Heather Frick
Bureau of Local Government
& School Finance
Richard H. Austin Building
430 West Allegan Street
Lansing, MI 48922

State Representative
Robert Wittenberg
District 27
Anderson House Office Building N0791
124 North Capitol Avenue
Lansing, MI 48933

Michigan State Attorney General
Public Integrity Unit
525 West Ottawa Street
Lansing, MI 48909



Supervisor Donna Squalls residence and garage operated as an illegal party store

Did you know?

- Supervisor Donna Squalls operates a commercial enterprise where she only pays a homestead residential property tax rate.
- This store is ILLEGAL
- This property has never been zoned for commercial activity.
- It is not grandfathered in at all, and never could be.
- It is a commercial entity which should be paying a non-homestead commercial property tax rate
- The supervisor is cheating residents and should know better!
- The supervisor should act better and she knows this store, which operates out of a makeshift garage is illegal!
- CALL Supervisor Donna Squalls to tell her to stop her illegal enterprise and pay her fair share!
 - Supervisor Squalls Office number: 248-542-7540

The Detroit News

OAKLAND COUNTY

Conflict between supervisor, 2 trustees roils Royal Oak Twp.

Mike Martindale The Detroit News

Published 11:06 p.m. ET Dec. 9, 2019 | Updated 12:22 a.m. ET Dec. 10, 2019

Royal Oak Township — Two trustees say the township supervisor acts like a "dictator" and want the state to intervene. The supervisor, who survived a recall attempt last year, says they are "trying to muddy my name."

Welcome to politics in Royal Oak Township, a small Oakland County community bordering Detroit that has no police force, fire department or post office — but does have a history of budget turmoil.

Two of the community's elected trustees, Karen Ballard and Jollie Dixon, asked the Michigan Department of Treasury and the Attorney General's Office last month to conduct a forensic audit, alleging that supervisor Donna Squalls has misappropriated funds, overstepped her authority and neglected her duties while running an illegal convenience store from her garage.

"It's all false and there is no basis," Squalls said. "I hope they get that audit — I may ask for one myself — because it will prove I have not done anything wrong."

One of the poorest communities in Metro Detroit, Royal Oak Township has seen its population drop by nearly half since 2000, to about 2,600, according to a 2017 Census Bureau estimate.

Median household income is \$26,406, less than half of the statewide figure, while budget troubles forced the township to operate under a consent agreement with the state from 2014 to 2017.

In a Nov. 13 letter to the state agencies, Ballard and Dixon said Squalls "operates like a self-appointed dictator in the dark" and listed numerous areas they want officials to investigate:

- Ballard and Dixon alleged a \$50,000 grant from the Treasury Department in March 2017 was not used for a water delivery rehabilitation project as intended and Squalls "has not explained where these funds have gone."

- The two trustees question the expenditure of more than \$219,000 from a \$1 million township police fund during the past three years, a period when patrol and other services have been

provided for free by Michigan State Police.

- Ballard and Dixon allege Squalls engineered the firing of a township manager, Tony DeBardelaben, in October after the official told the supervisor he worked for the trustees, not her. DeBardelaben could not be reached for comment.
 - The letter alleges that to fight the recall petition against her, Squalls used the township attorney to represent her and either told him to bill the township or coerced him into providing service for free.
 - The pair allege Squalls failed to fulfill office hours to her elected post, working instead at an "illegal convenience store" in her garage, selling tobacco products, lottery tickets and more.
- Neither Ballard nor Dixon responded to requests for comment.

Squalls said she was "hurt" when she first heard of the letter and then became angry.

"Next year is an election year and this is just an attempt to muddy my name," she said. "They have a target on me."

Squalls insists she has not been involved in the township's finances or hired lawyers with township funds. She said the firing of the manager — another flash point for her critics — was made by a majority vote of the township board.

"I am paid only \$20,000 a year," she said. "Who can live on that? I have to work another job (at the store) and put in my hours here at night.

"As far as being an illegal store, my father built it for my mother 71 years ago," Squalls said. "And many people, including Karen Ballard, have grown up shopping there."

Squalls is completing her second term as township supervisor after two terms as a trustee.

Two other township trustees said they were familiar with some of the concerns raised in the letter but did not sign it.

"I suspect all of these things can be explained and the township's finances are in good order," said Trustee Richard Miles. "The state award was used appropriately and the only money we may have taken out of the police fund would be to pay for extra state police for events, like the fireworks, for public safety.

"You aren't going to hear me say anything bad about any members of our board," he said.

"That's just not me."

Trustee Kim Tillery said she was never asked to sign the letter but has discussed some similar concerns with Squalls and other board members.

Tillery also said some of the people raising questions have been around long enough to "have blown the whistle years ago."

"I knew we got a state grant but I figured it was being held until this coming spring before it would be used towards anything," she said. "But when I came in, I let people know where I stood. And if I smell a rat, I made it clear I would say something."

As for Squalls, "I have never understood who sets her hours and when she keeps them," Tillery said. "I know there have been weeks when she hasn't been in the office and that's not right. As taxpayers, we pay her salary."

"I know she has said she has to take care of her mother and run their store but that's really on her," Tillery said. "If she couldn't put in the time, then she should have never run for the office."

"I would like us to have an independent audit and would like them to go back five years," she said. "I was going to ask for one myself."

Two state offices confirmed they have received the letter but no action has been taken on it.

"We received the request," said Kelly Rossman-McKinney, a spokeswoman for the state Attorney General's Office. "Our practice is to refer requests for audits to the Department of Treasury, which has accountants on staff skilled in this type of work. Following that, if there are indications of criminal conduct, we contact Michigan State Police to investigate."

Ron Leix, a spokesman for the Department of Treasury, said the office is "reviewing the letter" from Ballard and Dixon. "Generally speaking, we do occasionally receive requests from local units of government for the state to conduct an audit," Leix said.

Local units of government are required to submit an audit to the state Treasury Department within six months after their fiscal year ends.

"These audits are typically done by accounting firms contracted by the entity," Leix said.

Squalls maintained the township has complied with the audit requirement and "we are 100% funded and in the best shape we have been in years."

"If she (Ballard) was a good trustee, she would know that."

mmartindale@detroitnews.com

EXHIBIT G

Approved, SCAO

Original - Court
1st copy - Defendant2nd copy - Plaintiff
3rd copy - Return

STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT COUNTY PROBATE 6th	SUMMONS	CASE NO. 20-182128-CZ
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Court address

1200 N. Telegraph Road, Pontiac, MI

Court telephone no.

 Plaintiff's name(s), address(es), and telephone no(s).
 MICHIGAN HEALTH AND WELLNESS CENER, LLC,
 and JOI WINFREY, an individual,

 Plaintiff's attorney, bar no., address, and telephone no.
 Thomas P. Bruetsch (P57473)
 535 Griswold, Suite 850
 Detroit, MI 48226
 (313) 965-2121

v

 Defendant's name(s), address(es), and telephone no(s).
 CHARTER TOWNSHIP OF ROYAL OAK, and
 DONNA SQUALLS, (in her personal and official
 capacities),
 21131 Gardenlane, 2nd Floor
 Grant School
 Ferndale, MI 48220

Instructions: Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (form MC 21). The summons section will be completed by the court clerk.

Domestic Relations Case

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (form MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

Civil Case

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

 been previously filed in ☐ this court, ☐ _____ Court, where

it was given case number _____ and assigned to Judge _____.

 The action ☐ remains ☐ is no longer pending.

Summons section completed by court clerk.

SUMMONS**NOTICE TO THE DEFENDANT:** In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party or **take other lawful action with the court** (28 days if you were served by mail or you were served outside this state).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date	Expiration date*	Court clerk
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*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

PROOF OF SERVICE**SUMMONS**
Case No. 20-182128-CZ

TO PROCESS SERVER: You are to serve the summons and complaint not later than 91 days from the date of filing or the date of expiration on the order for second summons. You must make and file your return with the court clerk. If you are unable to complete service you must return this original and all copies to the court clerk.

CERTIFICATE / AFFIDAVIT OF SERVICE / NONSERVICE☐ **OFFICER CERTIFICATE**

OR

☐ **AFFIDAVIT OF PROCESS SERVER**

I certify that I am a sheriff, deputy sheriff, bailiff, appointed court officer, or attorney for a party (MCR 2.104[A][2]), and that: (notarization not required)

Being first duly sworn, I state that I am a legally competent adult, and I am not a party or an officer of a corporate party (MCR 2.103[A]), and that: (notarization required)

- ☐ I served personally a copy of the summons and complaint,
☐ I served by registered or certified mail (copy of return receipt attached) a copy of the summons and complaint,

together with

List all documents served with the summons and complaint

on the defendant(s):

Defendant's name	Complete address(es) of service	Day, date, time

- ☐ I have personally attempted to serve the summons and complaint, together with any attachments, on the following defendant(s) and have been unable to complete service.

Defendant's name	Complete address(es) of service	Day, date, time

I declare under the penalties of perjury that this proof of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee	Miles traveled	Fee
\$		\$
Incorrect address fee	Miles traveled	Fee
\$		\$
		TOTAL FEE
		\$

Signature

Name (type or print)

Title

Subscribed and sworn to before me on _____, _____ County, Michigan.
 Date

My commission expires: _____ Signature: _____
 Date Deputy court clerk/Notary public

Notary public, State of Michigan, County of _____

ACKNOWLEDGMENT OF SERVICE

I acknowledge that I have received service of the summons and complaint, together with _____
 Attachments

_____ on _____
 Day, date, time

Signature _____ on behalf of _____

This case has been designated as an eFiling case. To review a copy of the Notice of Mandatory eFiling visit www.oakgov.com/efiling.

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF OAKLAND

MICHIGAN HEALTH AND
WELLNESS CENTER, LLC, and
JOI WINFREY, an individual.

2020-182128-CZ

JUDGE HALA JARBOU

Plaintiffs

v.

Case No. 20-

CZ

CHARTER TOWNSHIP OF
ROYAL OAK, and DONNA
SQUALLS, (in her personal and
official capacities).

Defendants

SCHENK & BRUETSCH PLC
By: Thomas P. Bruetsch (P57473)
535 Griswold, Suite 850
Detroit, Michigan 48226
(313) 965-2121
TBruetsch@SBDetroit.com
Attorney for Plaintiff

COMPLAINT

There is no other pending or resolved civil action arising out of the transaction or occurrence alleged in the Complaint.

Plaintiffs state as follows for their complaint against Defendants:

1. Defendant Royal Oak Township is a Michigan Charter Township.
2. Defendant Squalls is the Royal Oak Township Supervisor and resides in Royal Oak Township, Oakland County, Michigan.

3. Plaintiff Michigan Health & Wellness Center LLC ("*Wellness*") is a property owner, taxpayer, and conducts business in Royal Oak Township, Oakland County, Michigan.

4. Plaintiff Joi Winfrey is a resident of Royal Oak Township and is registered with the Michigan Medical Marijuana Program as a person with a qualifying debilitating medical condition and has been issued a Medical Marijuana Registry Identification Card.

**THE TOWNSHIP LURES PLAINTIFF TO BUY,
CLEAN UP, AND SECURE PROPERTY**

5. Plaintiff Wellness is the owner of real property in Royal Oak Township, including 10550 W. 8 Mile Rd. and 20930 Meyers. Plaintiff also owns vacant land in Royal Oak Township that is adjacent to the aforementioned addresses, but does not have an address (collectively these addresses will be referred to as the "*Property*").

6. The Property was formerly the Mel Farr Ford automobile dealership. This now defunct business had achieved extensive statewide notoriety because it was owned and promoted by former Detroit Lions football player Mel Farr. Given this notoriety of Mr. Farr and his "superstar" dealership, the Property is still referred to and known to individuals residing/working in Royal Oak Township as the Mel Farr dealership site. The Property is a large parcel (+/- 14 acres) that, on information and belief, was abandoned in or around 2006 and had been neglected for many years at the time Plaintiff Wellness purchased it.

7. Before Plaintiff Wellness purchased the property, Plaintiff Wellness's representative(s) met several times with Royal Oak Township officials, including Defendant Squalls.

8. Plaintiff Wellness, through its representative, explained the entity's vision for the property to the Township officials, including Ms. Squalls, which included the development of multiple medicinal marijuana licensed businesses including grow operations, processing, and a provisioning center, among other uses. At that time, Royal Oak Township was under State of Michigan financial oversight and was subject to a consent agreement with the state.

9. Township officials, including Squalls, agreed that such a facility would provide economic benefits to the Township, which has only recently emerged from state financial oversight and which remains economically distressed.

10. At the first meeting, which occurred in mid-2017, Township officials, including Ms. Squalls and the Township's Consent Agreement Consultant (the "*Consultant*"), told Plaintiff Wellness that if it would clean up the property, they would support the development of medicinal marijuana uses on the site, which necessarily would require the Township to "opt-in" to the provisions of the Michigan Medical Marijuana Facility Licensing Act ("*MMFLA*"). The Township officials agreed that, at the time, there was no other viable use for the property.

11. At the time, Royal Oak Township was under State of Michigan supervision, and a Consent Agreement and state approved financial and operating plan controlled all aspects

of the Township's government. The State-approved consultant and/or Squalls had the unilateral authority to require the Township board to opt-in to the MMFLA pursuant to the Consent Agreement. See Sections 1(13)(f) and Section 6(e) of the MMFLA.

12. In any event, Ms. Squalls, as Township Supervisor, effectively controls the Township Board of Trustees (the "**Board**"), and as such, has the authority to hold public meetings, provide information to residents and receive commentary regarding the pros and cons of potential township actions, and to ultimately place matters, such as a vote to "opt-in" to the provisions of the MMFLA, on the Board's agenda.

13. Subsequently, there was a second meeting among Plaintiff and Township officials, including Ms. Squalls and the Consultant. Plaintiff Wellness provided an update on its efforts to invest in and clean up and secure the property, even before finalizing a purchase agreement. Squalls and the Consultant were ecstatic with Plaintiff Wellness's efforts, and once again reiterated their support of the planned development of medicinal marijuana uses on the site.

14. Plaintiff Wellness relied on the representations of the Township officials, including Ms. Squalls, and finalized the purchase of the property. Without their assurances, Plaintiff Wellness would never have purchased the property, or made significant investments/ and improvements on the Property.

15. However, after Plaintiff Wellness purchased the Property and made significant investments, the Township failed to "opt-in" to the MMFLA, and Squalls refused to even put a vote on opting into the provisions of the MMMFLA on the Board's agenda.

Plaintiff Wellness presented a draft resolution to the Township on more than four occasions and residents of the Township submitted more than 100 signed letters of support to the Board in favor of the project.

16. Defendants' actions to refuse to vote on proposed re-uses of the property and their public statements opposed to other uses that have been proposed for the site (i.e. used car lot, storage facility; car storage for non-profit corporation), have the cumulative effect of decreasing the property value of Plaintiff Wellness's Property.

17. The Township unjustly received a benefit, enriching it, at the Plaintiff's expense.

SQUALLS' USE OF PUBLIC FUNDS FOR PRIVATE PURPOSES

18. On June 25, 2018, a Royal Oak Township resident, Laquita Bartley, filed six recall petitions with the Oakland County Election Commission seeking to recall Ms. Squalls. On July 6, 2018, the Oakland County Election Commission met to consider whether to certify the petitions.

19. Ms. Squalls was represented at the Oakland County Election Commission meeting by attorney Michael Bosnic of Giamarco, Mullins & Horton.

20. Mr. Bosnic was, at the time, also the Township attorney.

21. Subsequently, Ms. Bartley appealed the Oakland County Election Commission's refusal to certify the recall petitions to the Oakland County Circuit Court. Mr. Bosnic again personally represented Ms. Squalls in the proceedings. Mr. Bosnic also represented Ms. Squalls in related proceedings in the Court of Appeals.

22. On information and belief, Mr. Bosnic billed Royal Oak Township for his representation of Squalls before the election commission, Oakland County Circuit Court, and/or Michigan Court of Appeals. Alternatively, Mr. Bosnic represented Ms. Squalls for free based on his for-pay relationship with Royal Oak Township.

23. Further, on information and belief, Mr. Bosnic neither requested nor received a formal conflict waiver from the Royal Oak Township Board prior to undertaking the representation of Ms. Squalls in the private matter of her recall petition.

24. As a matter of law, there is an inherent conflict between the representation of one trustee in a recall matter and the representation of the public body corporate on which the trustee serves.

**ROYAL OAK TOWNSHIP'S GROSSLY
NEGLIGENT CONDEMNATION OF THE ROYAL INN**

25. In August, 2017, the Township condemned the Royal Inn (the "*Inn*") asserting public safety hazards and criminal activity, including drugs and prostitution. The Inn abuts Plaintiff Wellness's Property to the west and the south.

26. At the time of the condemnation, over 400 individuals resided at the Inn. Given the various complaints and investigation into the complaints regarding the Inn leading up to the condemnation, the Township was on notice that criminal activity, including violent crime, drugs, and prostitution, were prevalent among the residents and guests of the Inn.

27. The Township also knew that closing the Inn would leave many of its residents homeless.

28. The Township provided only minimal, if any, social services to former residents of the Inn.

29. The Township does not have a police or public safety department. The only entity that provides police protection in the Township is the Michigan State Police.

30. The inevitable and foreseeable consequence of the Township's decision to condemn the Inn and effectively evict its residents without providing alternative housing, social services, and an effective police presence was that many now-homeless individuals would gravitate to nearby properties and cause mayhem and damage.

31. That is exactly what occurred. Plaintiff's Property was repeatedly broken into, and vagrants occupied the property, vandalized it, and stripped it of copper and other materials. Plaintiff repeatedly was forced to re-board the property in an attempt to keep squatters out.

32. "If the state puts a man in a position of danger from private persons and then fails to protect him, it will not be heard to say that its role was merely passive; it is as much an active tort-feasor as if it has thrown him into a snake pit." *Estate of Sinthasomphone v. The City of Milwaukee*, 785 F.Supp 1343 (E.D. Wisc) (1992).

33. By condemning the Inn without an appropriate plan for dealing with the aftermath of its decision to condemn the Inn, the Township put Plaintiff Wellness in a position of danger, and then failed to protect it.

34. Defendants' failure to provide for a local police force and to adequately protect the Plaintiff Wellness's property from continued vandalism further reduces the property value of the Plaintiff Wellness's Property and made the Property less attractive to potential purchasers or future tenants.

UNLAWFUL RETALIATION AND ABUSE OF POWER

35. At a Board meeting on or about September 13, 2018, Ms. Squalls verbally abused Plaintiff Wellness's agent, asserting that the agent had spearheaded the recall campaign against her.

36. Following the meeting, Ms. Squalls filed court papers falsely asserting that Plaintiff's agent was a physical threat to her and requesting a personal protection order. The papers filed by Ms. Squalls contain material inaccuracies, speculation, and facially and patently did not meet the test for the issuance of a personal protection order.

37. Ms. Squalls had another Board member personally serve a notice of hearing on the agent.

38. The real reasons for the filing of the papers were to (1) embarrass the agent, (2) attempt to preclude him from attending meetings of the Board, (3) cause a chilling effect on the agent's exercise of protected first amendment speech since the agent was

interacting with residents who were expressing displeasure with Ms. Squalls on a daily basis; and (4) to intimidate the agent and try to have him dismissed from his engagement with Plaintiff Wellness.

39. Ms. Squalls' attempt to obtain the personal protection order failed.

40. These acts constitute abuses of power and process, as well as unlawful retaliation.

41. There has been a pattern and practice of abuses of power within Township government.

42. Upon information and belief, Ms. Squalls operates a commercial business in a residentially zoned location, in violation of local laws and regulations. The business has not been cited for violations because the enforcement officials for the Township report to Ms. Squalls. Ms. Squalls conduct is in violation of MCL 15.342.

43. Recently, Township Trustee Karen Ballard documented allegations of misuse of public funds and neglect of duty, and accused Ms. Squalls of being a "self-appointed dictator." Ms. Ballard's letter documented the following conduct by Ms. Squalls and the Township:

- a. Diversion of grant funds for a Water Delivery System Rehabilitation project;
- b. Misuse of funds for a Recreation Center project;

- c. Irregularities in budget documents, including with respect to the funding of an MOU with the Michigan State Police;
- d. Failure to notify the Board of Trustees concerning potential conflicts of interest in using the Township Attorney to represent Squalls in her personal capacity;
- e. Retaliation against the former Township Manager;
- f. Neglect of Duty;
- g. Operating a store from a residential property without conforming to zoning regulations or paying commercial property tax.
- h. Failing to inform the Township Board of Trustees concerning Township spending;
- i. Violations of the Open Meetings Act;

VIOLATION OF THE PERSONS WITH DISABILITIES CIVIL RIGHTS ACT

44. During several public comment sections of Board agendas over the past year, many Township residents with medical marijuana cards have spoken about their need to have access to medication within close proximity to their homes.

45. Some of the Township's residents with qualifying debilitating illnesses also have mobility issues that impact their ability to travel to obtain medication.

46. Defendant Squalls, along with other Township Trustees, have made public comments that approval of Medical Marijuana facilities within Royal Oak Township would result in increased crime, would reduce property values, and would otherwise create negative perceptions of the community.

47. Such statements violate the Persons with Disabilities Civil Rights Act.

48. Upon information and belief, the Township's refusal to place the opt-in vote on the agenda and to approve medical marijuana within the Township while authorizing other forms of pharmacies within the community, are intended to unlawfully discriminate against individuals with debilitating illnesses that are treated by medicinal marijuana.

**VIOLATIONS OF ELECTION LAW, EQUAL PROTECTION,
AND PLAINTIFFS' CIVIL RIGHTS**

49. Plaintiffs supported a ballot initiative in May 2019 that would have allowed for the limited establishment of licensed marijuana businesses within Royal Oak Township.

50. Defendant Squalls bitterly opposed the ballot initiative, and conspired with others including Clerk Turner to illegally defeat the measure.

51. Among other things, the conspiracy involved:

a. The delay in mailing absentee ballots. Absentee ballots were reprinted and available for mailing by April 12, 2019. Nevertheless, even though the statutory deadline to mail the ballots had long since passed, the Township Clerk waited until several days later to mail the ballots or otherwise make them available. This action violated MCL 168.714. The Clerk also failed to timely provide absentee voter lists on request.

b. The failure to set up a voting machine in the Township Clerk's office so that early voting could be conducted. This is a violation of the Michigan Constitution and state law. MCL 168.761.

c. The failure to open the Township Clerk's office for voting, as required, on the Saturday or Sunday before Election Day. This is also a violation of the Michigan Constitution and state law. MCL 168.761b.

d. The failure to publish the text of the ballot proposal, as required by MCL 168.653a.

e. The failure to put the text of the proposal on the Clerk's website. The Clerk did, however, post information concerning a different ballot proposal, the Township's millage proposal, on her website.

52. Squalls conspired with the Township Clerk and other Township officials to run an illegal campaign against the ballot proposal.

53. Michigan law requires that persons who accept contributions or make expenditures for or against a ballot question must, among other things, (A) establish a committee and file a statement of organization with the County Clerk (MCL 169.224); and (B) file campaign finance reports disclosing information of expenditures and contributions (MCL 169.225). Campaign Finance law also requires that materials distributed by proponents or opponents of a ballot question to clearly identify the person or entity paying for the communication and its/their address. MCL 169.247.

54. Township officials signed campaign flyers and organized the distribution of printed materials, lawn signs, and other campaign communications opposing the ballot proposal.

55. Trustee Richard Miles put anti-Proposal 1 signs up in front of the Township Recreation Center. The signs did not have the legally required disclaimer information. Upon information and belief, Trustee Miles works for the Township's Parks and Recreation Department and indirectly works under Supervisor Squalls.

56. However, no committee was set up, and the communications do not disclose who paid for the campaign materials.

57. It is possible that these materials were created using Township resources.

58. The actions of Township officials who have failed to form a committee and file a statement of organization violate MCL 169.224.

59. The actions of Township officials who have failed to file campaign finance reports violate MCL 169.234.

60. Even more egregiously, the Royal Oak Township Housing Commission threatened persons living in its subsidized housing with lease violations for displaying signs concerning the ballot proposal. But the Commission allowed signs opposing the proposal. Indeed, a Housing Commissioner had an anti-Proposal 1 lawn sign at his Housing Commission residence.

61. In addition, the Township Clerk and election officials, in violation of state law, committed numerous violations of state law on Election Day. Township officials, while standing or sitting less than 100 feet from polling places, told voters entering the polls to vote against the ballot proposal. This is a violation of the Michigan Election Act, as set forth in MCL 168.931(1)(k).

62. The individuals involved and election officials were notified of these violations of state law, but did nothing to stop them.

63. To the contrary, election officials attempted to intimidate and remove persons campaigning in support of the ballot proposal who were more than 100 feet from the election site from their positions.

64. Most egregiously, the Township ejected officially registered Election Challengers and other members of the public, including plaintiff Winfrey, from the Township's Absentee Ballot Counting Boards and refused to allow them to observe the ballot count.

65. The Township's actions violated MCL 168.801, which requires that vote counts be held in an unlocked room open to the public, as well as plaintiffs' civil rights.

66. Because the absentee ballots were counted in secret, the process was subject to fraud by biased Township officials.

67. The actions of the Township constitute willful failures to perform duties imposed by the Michigan Election Act, and violates MCL 168.931(1)(h) and (2).

COUNT I – UNJUST ENRICHMENT

68. Plaintiffs restate all prior allegations.

69. As set out above, Ms. Squalls and other Township officials lured Plaintiff Wellness to purchase, clean up, and secure property within the Township with promises of support of Plaintiff's intended uses for the Property.

70. Plaintiff did, in fact, purchase, secure, and clean up the Property.

71. Squalls and the Township did not support Plaintiff's intended use of the Property and instead actively worked against that use.

72. The Township and Ms. Squalls received benefits from Plaintiff's purchase, clean-up, and securing of the Property, including but not limited to increased tax revenue.

73. It is inequitable for the Township and Ms. Squalls to retain such a benefit given their subsequent acts.

74. The Township and Ms. Squalls must provide restitution, including but not limited to specific performance of their promises, to Plaintiff Wellness for their unjust enrichment.

COUNT II - FRAUDULENT MISREPRESENTATIONS

75. Plaintiffs restate all prior allegations.

76. As set out above, Ms. Squalls and other Township officials made representations to Plaintiff Wellness that they approved of its intended uses for the Property and would support Plaintiff Wellness if it cleaned up and purchased the Property.

77. At the time the Township officials made their representations, they had the authority to bind the Township to taking such actions as necessary for the Township to approve the development of medicinal marijuana facilities on the site.

78. Ms. Squalls and the Township intended Plaintiff Wellness to rely on their representations.

79. The representations were not made in the performance of a governmental function.

80. The representations were untrue, and Ms. Squalls and the Township knew that they were untrue at the time they were made.

81. Defendants intended that Plaintiff Wellness rely on the representations.

82. Plaintiff Wellness relied on the representations to its detriment.

83. The false representations caused Plaintiff Wellness damages, including lost profits, loss of value in the property, and hundreds of thousands of dollars invested in the property on the basis of the false representations.

COUNT III – UNLAWFUL ABUSES OF POWER AND RETALIATION

84. Plaintiffs restate all prior allegations.

68. Members of the Township board, including Ms. Squalls, are biased against Plaintiff Wellness and its agent, as evidenced by Ms. Squalls' facially invalid and retaliatory attempt to obtain a personal protection order against Plaintiff Wellness' agent. The conflicts and biases of Township officials, including Ms. Squalls, have caused damages to Plaintiff Wellness, including harm to Plaintiff Wellness's reputation, diminution of value of Plaintiff Wellness's property, lost profits, and lost investments in the hundreds of thousands of dollars and caused Plaintiff Wellness to purchase the Property at a price that took into account defendants' representations concerning the approval of medical marijuana at the location.

COUNT IV – USE OF PUBLIC FUNDS FOR PRIVATE PURPOSES

69. Plaintiffs restate all prior allegations.

70. Michigan law, including MCL 15.342, forbids public officials from using public funds for private purposes, or from accepting gratuities in return for public business. All contracts which involve an attempt to use public money for the furtherance of a private enterprise are void.

71. On information and belief, Mr. Bosnic either represented Squalls individually during the recall proceedings and received compensation from the Township for the representation, or he did so to ingratiate himself with Squalls to receive continued contractual employment from the Township.

72. Squalls breached these provisions of Michigan law when she had Mr. Bosnic represent her in the recall proceedings. Squalls also concealed her actions by failing to

place a resolution on the agenda to seek approval for a conflict waiver for this dual representation, if this was even a waiveable conflict. Further, Squalls does not account for the cost of representation as either a campaign expenditure or as an in-kind donation. In fact, based upon a search of the Oakland County Clerk's campaign finance database, Ms. Squalls has not filed a campaign finance statement since 2012.

COUNT V – GROSS NEGLIGENCE

73. Plaintiffs restate all prior allegations.

74. “If the state puts a man in a position of danger from private persons and then fails to protect him, it will not be heard to say that its role was merely passive; it is as much an active tort-feasor as if it has thrown him into a snake pit.” *Estate of Sinthasomphone v. The City of Milwaukee*, 785 F.Supp 1343 (E.D. Wisc) (1992).

75. By condemning the Inn and putting numerous individuals with criminal histories on the streets with inadequate social services or police protection, the Township put Plaintiff Wellness in a position of danger, then failed to protect it.

76. In addition, and alternatively, the Township and Ms. Squalls made promises to Plaintiff Wellness concerning what activity and business would be allowed on the Property that they should have known could not be kept.

77. All of these actions were grossly negligent.

78. The Township's gross negligence caused Plaintiff Wellness damages.

COUNT VI – REGULATORY TAKING

79. Plaintiff restates all prior allegations.

80. As noted above, Defendants refuse to place on the Township's agenda a vote on allowing medical marijuana facilities in the Township.

81. Defendants have rejected other potential uses for the property, including uses as a used car lot, storage facility, and as a car storage lot for a non-profit corporation.

Thus, the Defendants have denied Wellness the economically viable use of its land. Defendants' actions constitute a regulatory taking of Plaintiff Wellness' property, causing Plaintiff Wellness damages.

COUNT VII – VIOLATIONS OF THE PERSONS WITH DISABILITIES CIVIL RIGHTS ACT

82. Plaintiff reasserts all prior paragraphs.

83. Under the Persons with Disabilities Civil Rights Act ("*Act*"), a person may not deny an individual the full and equal enjoyment of goods, services, facilities, privileges, advantages or accommodations of a place of public accommodation or public service because of a disability.

84. Thousands of disabled individuals, including Plaintiff Winfrey, rely on medical marijuana to treat their disabilities.

85. The Township has allowed pharmacies to open and operate within its boundaries. Those pharmacies are allowed to place highly addictive and dangerous drugs, including

narcotics and opioids into the community. However, such pharmacies do not carry medical marijuana.

86. Defendants discriminate against disabled individuals with prescriptions and licenses for medical marijuana by denying them the full and equal enjoyment of goods, services, facilities, privileges, advantages or accommodations of a place of public accommodation.

87. Furthermore, under the Act, a person may not represent that a change will occur in a neighborhood composition with respect to persons with disabilities of the owners or occupants of the neighborhood, or represent that the change will or may result in the lowering of property values, or an increase in criminal or antisocial behavior in the area where the property is located.

88. Township officials, including Squalls, have represented that the proposed medical marijuana facilities, which will serve persons with disabilities, will lower property values and increase crime and antisocial behavior.

89. On information and belief, these statements have caused the diminution in value of the property and other damages, and have violated the civil rights of Winfrey and others.

COUNT VIII – EQUAL PROTECTION

90. As stated above, Defendants organized a concerted and illegal campaign against a ballot measure that would have allowed for the establishment of marijuana related businesses in Royal Oak Township.

91. The campaign involved voter intimidation, voter suppression, the exclusion of observers from polling places, and campaign finance violations.

92. The Michigan Constitution provides for the purity of elections and against abuses of the election franchise. 1963 Const., Art. II, sec. 4.

93. The conspiracy violated Plaintiffs' civil and statutory rights and diminished the value of Plaintiff Wellness's property. In particular, the conspiracy violated Plaintiffs' right to equal protection under the law, as guaranteed by Art. I, sec. 2 of the 1963 Constitution.

WHEREFORE, Plaintiffs request that this Honorable Court enter judgment in their favor, and against the Defendants, on all counts and in such amount exceeding \$25,000 that fully and fairly compensates Plaintiffs for their losses, and that the Court award Plaintiff restitutionary relief and specific performance against the Defendants for their inequitable conduct and unjust enrichment, along with statutory damages, interest, attorney fees, and such other relief that is just under the circumstances.

Respectfully Submitted,

SCHENK & BRUETSCH PLC

By: /s/Thomas P. Bruetsch
Thomas P. Bruetsch (P57473)
535 Griswold St., Suite 850

Detroit, Michigan 48226
(313) 965-2121
TBruetsch@SBDetroit.com

Dated: July 1, 2020



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

April 23, 2021

Virgil Smith
PO Box 21032
Detroit, MI 48221

Dear Mr. Smith:

The Department of State received a response to the complaint you filed against Donna Squalls, which concerns an alleged violation of the Michigan Campaign Finance Act (MCFA), 1976 P.A. 388, MCL 169.201 *et seq.* A copy of the response is provided as an enclosure with this letter.

If you elect to file a rebuttal statement, you are required to send it within 10 business days of the date of this letter to the Bureau of Elections, Richard H. Austin Building, 1st Floor, 430 West Allegan Street, Lansing, Michigan 48918.

Sincerely,

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

Adam Fracassi
Bureau of Elections
Michigan Department of State

c: Donna Squalls

Smith, Jessica (MDOS)

From: Virgil Kai Smith <virgilksmith@gmail.com>
Sent: Thursday, May 6, 2021 6:30 AM
To: SOS, Disclosure
Subject: Rebuttal Statement to MCFA Complaint filed against Donna Squalls
Attachments: Rebuttal statement to Donna Squalls MCFA complaint .pdf

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

Good morning,

The attached document is for Mr. Adam Fracassi

If questions arise, or there is a need to contact me, my contact information is listed below

Thank you

--

Virgil K. Smith, M.P.A.
VKS Consulting, LLC
(313) 424-0813
virgilksmith@gmail.com

RECEIVED/FILED
MICHIGAN DEPT OF STATE
281 MAY -7 PM 3:17
ELECTIONS/GREAT SEAL

May 5, 2021

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

**RE: Statement in Rebuttal to Ms. Donna Squalls February 27, 2021 Response to My Complaint
Alleging Violations of the Michigan Campaign Finance Act ("MCFA"), 1976 P.A. 388,
MCL 169.201, et seq.**

Dear Mr. Fracsaai:

My original complaint identified 6 instances where I believe Ms. Squalls violated the MCFA. However, in response to my complaint, Ms. Squalls focuses on and attempts to misguide the Bureau with demonstratively false personal attacks that have all been dismissed for lack of merit. Regardless of Ms. Squalls personal beliefs towards me, my complaint objectively explains the instances where Ms. Squalls either knowingly or negligently violated the MCFA.

Rebuttal to Ms. Squalls Response to Allegations

Allegation 1.) Ms. Squalls is a veteran of municipal government, serving over 20 years, first on the Trustee Board and currently for the last 8 years as the Supervisor of Royal Oak Township. Surprisingly, her response claims that she was unaware of the disclosure requirement. Ignorance of the law (when convenient) is not a valid excuse. Attached is a copy of literature by other candidates in Royal Oak Township. Other candidates follow or are aware of this requirement. How is a veteran of municipal government and current elected supervisor of the township reasonably unaware?

Allegation 2.) Ms. Squalls produced 3 receipts totaling \$1,125.90. There are likely many more expenses not listed or disclosed, yet Ms. Squalls attempts to explain each receipt. The first receipt, dated 6/16/20, totals \$599.31. The receipt, made out to Donna Squalls directly and not a registered campaign, states that the purpose for purchase is for "campaign flyers". The second receipt, dated 7/28/20, totals \$410.00 and the identifies its purpose is for two-sided yard signs. Again, the receipt is made out to Donna Squalls and not a registered campaign committee. The third receipt, dated 10/29/20, totals \$116.59, and the stated purpose is for flyers. Like before, the receipt is made out to Donna Squalls and not a registered campaign committee. Based on Ms. Squalls response, I believe she violated the MCFA.

Allegation 3.) Ms. Squalls denies organizing an opposition campaign to two different ballot proposals, but she does admit: "*there were groups of individuals formed to protest marijuana in the community*". There is no explanation on how these "groups" were formed or who paid for the campaign material. The township is a community with a population of approximately 2,500 residents with 13 streets & 1 stop light. It is unreasonable to believe that the elected supervisor has no knowledge of who is disseminating information in her backyard. Moreover, if needed, I can produce/provide sworn statements signed by residents of the township who personally witnessed Ms. Squalls direct involvement within opposition campaigns.

Allegation 4.) Ms. Squalls response to this allegation reveals her complete disregard for the MCFA and the rules that all other candidates must follow.

Allegation 5.) Ms. Squalls response to this allegation does not disclose how she knew that "Park Commissioners" paid for the disputed campaign flyer. No receipts were ever produced to explain the purchase. In addition, no required campaign committee was formed to distribute this flyer. Based on Ms. Squalls vague and unsupported response, I believe she knowingly violated the MCFA.

Allegation 6.) Ms. Squalls failed to respond to Allegation 6 so no rebuttal is necessary.

I am a political veteran who served over 12 years in both the Michigan House of Representatives and the Michigan Senate. As such, I understand that the MCFA requires the Bureau to fashion a remedy that will prevent further violations. Simply put, Ms. Squalls is not a political newcomer who can claim ignorance of the law (not that that is a reasonable excuse or otherwise allowed under the MCFA). In this case, I believe Ms. Squalls knowingly maneuvered as if the MCFA does not apply to her and a simple warning cannot redress her intentional circumvention of the requirements of the MCFA.

Sincerely,



Virgil Smith
Treasurer
Invest In Royal Oak Township
Oakland County Committee # 97154
P.O. Box 21032
Detroit, MI 48221

“CHANGING THE LEADERSHIP?” VOTES MAY VOTE FOR CHANGE.

VOTE FELICIA “LISA OLDHAM” ROYAL

SUPERVISOR
FOR CHARTER TOWNSHIP OF ROYAL OAK



Our relationships with surrounding cities is dysfunctional. We should be entitled to the same services as them, at the same time as them!

ALLOW ME TO BUILD BETTER RELATIONSHIPS WITH SURROUNDING CITIES:

- That they may share knowledge with us.
- That we may progress with them.
- That they may assist and lend a helping hand.

LET'S APPOINT LIAISONS to represent our community in surrounding cities and communicate with the citizens of Royal Oak Township, consistently updating us concerning our issues.

**SHADE IN MY
NAME FIRST**

NOVEMBER 3RD, 2020

 **FELICIA ROYAL**

PAID FOR BY FRIENDS TO ELECT FELICIA ROYAL
Google Phone: (678) 774-9772 • www.Facebook.com/ElectFelicia
Email: ElectFelicia2020@gmail.com



IF YOU WANT TO GET RID OF OUR
CURRENT SUPERVISOR, WHEN FILLING
OUT YOUR BALLOT

SHADE IN MY NAME FIRST

NOVEMBER 3RD, 2020

 **FELICIA ROYAL**

LET'S NOT WAIT UNTIL
ELECTION TIME TO GET
RID OF BLIGHT!



PAID FOR BY FRIENDS TO ELECT FELICIA ROYAL
Google Phone: (678) 774-9772 • www.Facebook.com/ElectFelicia
Email: ElectFelicia2020@gmail.com



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

May 20, 2021

Donna Squalls
21241 Westview Ave
Ferndale, MI 48220

Re: *Smith v. Squalls*
Campaign Finance Complaint
No. 2020-11-199-47

Dear Ms. Squalls:

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

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

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

Sincerely,

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

Adam Fracassi
Bureau of Elections
Michigan Department of State

c: Virgil Smith



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

September 24, 2021

Donna Squalls
21241 Westview Ave.
Ferndale, MI 48220

Re: *Smith v. Squalls*
Campaign Finance Complaint
No. 2020-11-199-47

Dear Ms. Squalls:

The Department of State (Department) has finished investigating the campaign finance complaint filed against you by Virgil Smith alleging violations of the Michigan Campaign Finance Act (MCFA). This letter concerns the disposition of the complaint.

The complaint makes several allegations. First, the complaint alleges that you failed to place a proper identifier on your campaign yard signs and literature. Second, the complaint alleges that you exceeded \$1,000.00 in expenditures but failed to file a campaign finance statement. Third, the complaint alleges that you organized two ballot committees without filing required campaign finance disclosures. Fourth, the complaint alleges that materials distributed in two ballot initiative campaigns did not contain proper identifiers. Fifth, the complaint alleges that you produced literature advocating for the election of a slate of candidates without filing required campaign finance disclosures. Sixth, the complaint alleges that you produced and distributed a separate set of campaign materials for the committee "United Concern [sic] Citizens of Royal Oak Township" without filing required campaign finance disclosures. In support of these allegations, the complaint included images of various yard signs and campaign literature, in addition to a copy of the Reporting Waiver Request you filed with Oakland County.

You have responded to the allegations in the complaint. In response to the first allegation, you have admitted to producing and distributing campaign literature and yard signs that lack a proper identifier. You have stated that you were unaware of the requirement that a proper identifier be included. In response to second allegation, you have denied spending more than \$1,000.00 on your campaign, and thus claim that you are below the waiver threshold. In response to the third, fourth, and fifth allegation, you have denied any involvement with the ballot committees in question, as well as any involvement with the production of the campaign material described in the complaint. While you did not specifically respond to the sixth allegation, your response

suggests that you also deny any involvement with the United Concern Citizens of Royal Oak Township. Your response included receipts showing your campaign expenditures, images of some campaign literature, and voluminous documentation of your relationship with Mr. Smith.

Mr. Smith filed a rebuttal statement addressing your response. In that statement, Mr. Smith cites your history in local government as evidence of your knowledge of campaign finance requirements. Mr. Smith also points out that your receipts total \$1,125.90 in campaign expenditures. Finally, Mr. Smith disputes your claim that you were not involved in the campaign committees and activities that formed the basis for his third, fourth, fifth, and sixth allegations against you.

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 of this requirement constitutes a misdemeanor offense punishable by a fine up to \$1000.00, imprisonment for up to 93 days, or both. MCL 169.247(6).

The MCFA also requires candidate and committees file contributions and expenditures with the appropriate filing official by specific dates. MCL 169.233(1) – (3). The MCFA requires a committee that receives or expends more than \$1,000 during any election to file campaign finance reports in compliance with the Act. MCL 169.233(6). A person who knowingly omits or underreports expenditures required to be disclosed by the MCFA is subject to a civil fine of not more than \$1,000 or the amount of the expenditures omitted or underreported, whichever is greater. MCL 169.233(11).

The Department has reviewed the evidence submitted in the matter. The Department dismisses the complaint as to the third, fourth, fifth, and sixth allegations, which allege that you were involved with campaign activities carried out by campaigns that failed to comply with campaign finance law. There is no evidence of your involvement with the activities in question beyond bare assertions in the complaint, so the Department dismisses these allegations.

The Department also dismisses the complaint as to the second allegation. The receipts you submitted show that you spent \$410.00 for yard signs and postcards to Doorstep Printing and Graphics on July 28, 2020, \$116.59 to Doorstep Printing on October 29, 2020, and \$599.31 to Sir Speedy Printing and Marketing Services on June 16, 2020, for a total of \$1125.98. You explain, however, that the \$599.31 charge to Sir Speedy Printing and Marketing Services was for a "collage of campaign material" advocating for the election of several candidates, including yourself, and that all the candidates included in the collage material shared the cost of the service. You state that your portion of the cost was \$85.00 and that, while you paid the vendor in full, you were reimbursed for the remaining \$514.31 by the other candidates. Because the \$514.31 reimbursed to you in your personal capacity by other candidates is not an expenditure by your campaign, the submitted receipts show that you spent only \$611.67 on your campaign, and thus qualify for a reporting waiver.

The Department finds that, as to the first allegation, the evidence submitted supports the conclusion that a potential violation of the MCFA has occurred. The yard signs and campaign literature you produced advocating for your reelection as supervisor states “Re-Elect Donna Squalls” and “Vote Democrat.” Both statements are express advocacy as defined by the Act. MCL 169.206(2)(j). Because the statements urges voters to vote for you using words of express advocacy and were published by your committee, the signs are covered by the ambit of the Act and must include the paid for by statement outlined under Section 47. *Id.* However, the yard signs and campaign materials have completely omitted the required paid for by statement. Since this phrase is absent, the evidence supports the conclusion that a potential violation has occurred.

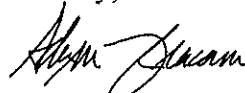
After reaching this conclusion, the MCFA requires the Department to “endeavor to correct the violation or prevent a further violation by using informal methods” if the Department finds that “there may be a reason to believe a violation . . . has occurred[.]” MCL 169.215(10). The objective of an informal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

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,



Adam Fracassi
Bureau of Elections

c: Virgil Smith