



**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>Tanya Stewart</i>		Daytime Telephone Number <i>989-600-1367</i>	
Mailing Address <i>1969 West Hines Road</i>			
City <i>Sanford</i>	State <i>MI</i>	Zip <i>48657</i>	
Email (optional) [REDACTED]			

Section 2. Alleged Violator			
Name <i>Laura Dawson</i>			
Mailing Address <i>2125 West Gordonville Road</i>			
City <i>Midland</i>	State <i>MI</i>	Zip <i>48640</i>	
Email (optional) [REDACTED]		<i>989-837-3250</i>	
<i>www.FaceBook.com/Vote-2020-Lee-Township</i>			
Section 3. Allegations (Use additional sheets if more space is needed.)			

Section(s) of the MCFA alleged to be violated: _____

Explain how those sections were violated:

See Attachment: PDF:
Complaint on Laura Dawson running for
Clerk in Lee Township 2020

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

See Attachments: 1A, 2B [PDF], 2C, 3A, 3B, 4A,
7A, 7B, and 7C

Laura Dawson for Clerk

[lives at: 2125 West Gordonville Road, Midland Michigan 48640]

Section 3. Allegations

I wonder who paid for her signs that she posted around the township and has been posting pictures of on her web page.

Has misleading posts on her web page [Vote 2020 Lee Township]. Reads like the candidates she is writing about are up for re-election, when they are not. [See Attachment: 1A] Does not include all the candidates running in the Lee Township elections this year.

Does she not have to have the approval of the township to use that name in her elections materials?

Where did she get the list of all the people living in Lee Township?

Where did she get the flyers printed? [See PDF Attachment: 2B] [See Attachment: 2C]

She is also using the Lee Township Hall number for her campaign communications [See Attachment: 3A, and 3B]. This also makes me wonder if she printed the flyers at the Hall.

Who paid to have a news article written up? [See Attachment: 4A]

Locations of some signs posted around the township:

1] NW corner of M30 and Justin Ct. [not sure if on the property or on corner]

The nearby address is 841 North Meridian Road, Midland Michigan 48640. The signs are located south of driveway.

2] Corner of West Olson Road and North 8 Mile

The nearby address is 982 West Olson Road, and the driveway is on North 8 Mile.

3] On north side of West Olson Road, across the road from nearby address of 360 Kobler Road, Midland Michigan 48640 [which runs south off of west Olson road]

4] 1428 West Olson Road, Midland Michigan 48640

5] 1369 West Olson Road, Midland Michigan 48640

6] 528 and 526 North 9 Mile Road, Sanford Michigan 48657 [connected building]

7] Attachments show the signs posted on the web page [7A, 7B, and 7C]

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

1

Like

Comment

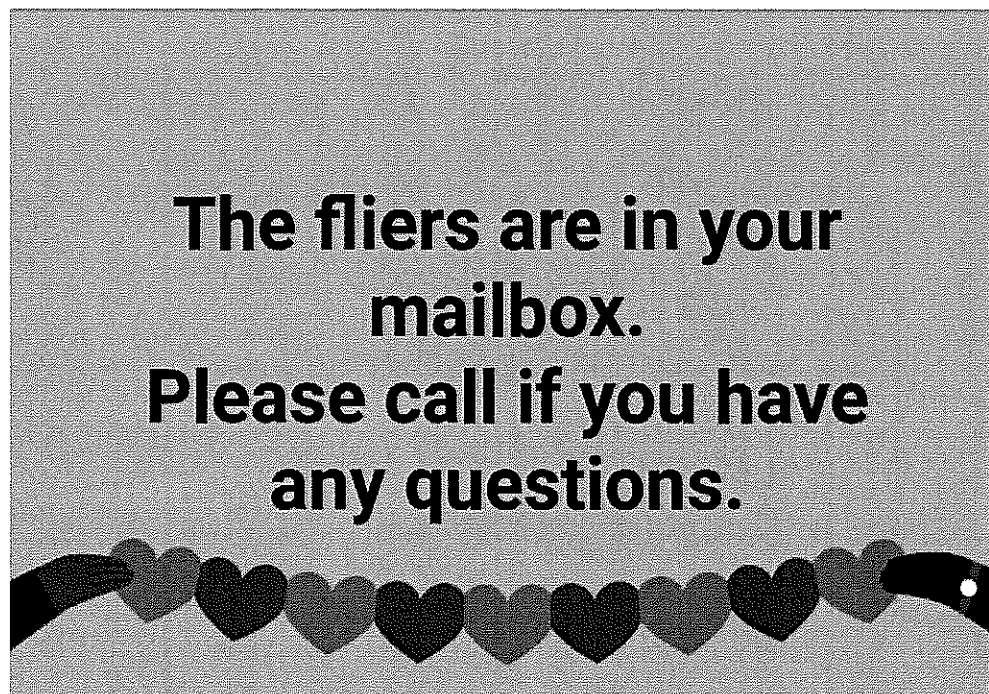
Share



Vote 2020 Lee Township

June 19 at 9:38 PM ·

...



1 Comment 1 Share

Like

Comment

Share



Vote 2020 Lee Township

June 17 at 5:27 PM ·

...

Well, the 3 new running mates and I have gotten together a few times. I am really glad to have met them. I am Thankful they are stepping up to the bat. We really need some "Young" new members. We finished up on the apx 1,600 envelopes. We folded, stuffed, stamped and labeled all of them. Watch for

Send Message

...



Replies

want to tell you how to live, any more than I want some one to do that to me. There are people that have trash in their yard as well as many cars. Things that are "blight". It's fine to have "resources" as long as you don't infringe on your neighbors. Fences sure help with that. We want the township to be family oriented. We want people to respect their neighbors. Help us with ideas to make our township a desirable home base. If you would like to talk in person, feel free to give me a call anytime. 832-2874 is the hall number. Laura

16h Like Reply
Message



Write a reply...



2:02



41%



2

2 Shares



Like



Comment

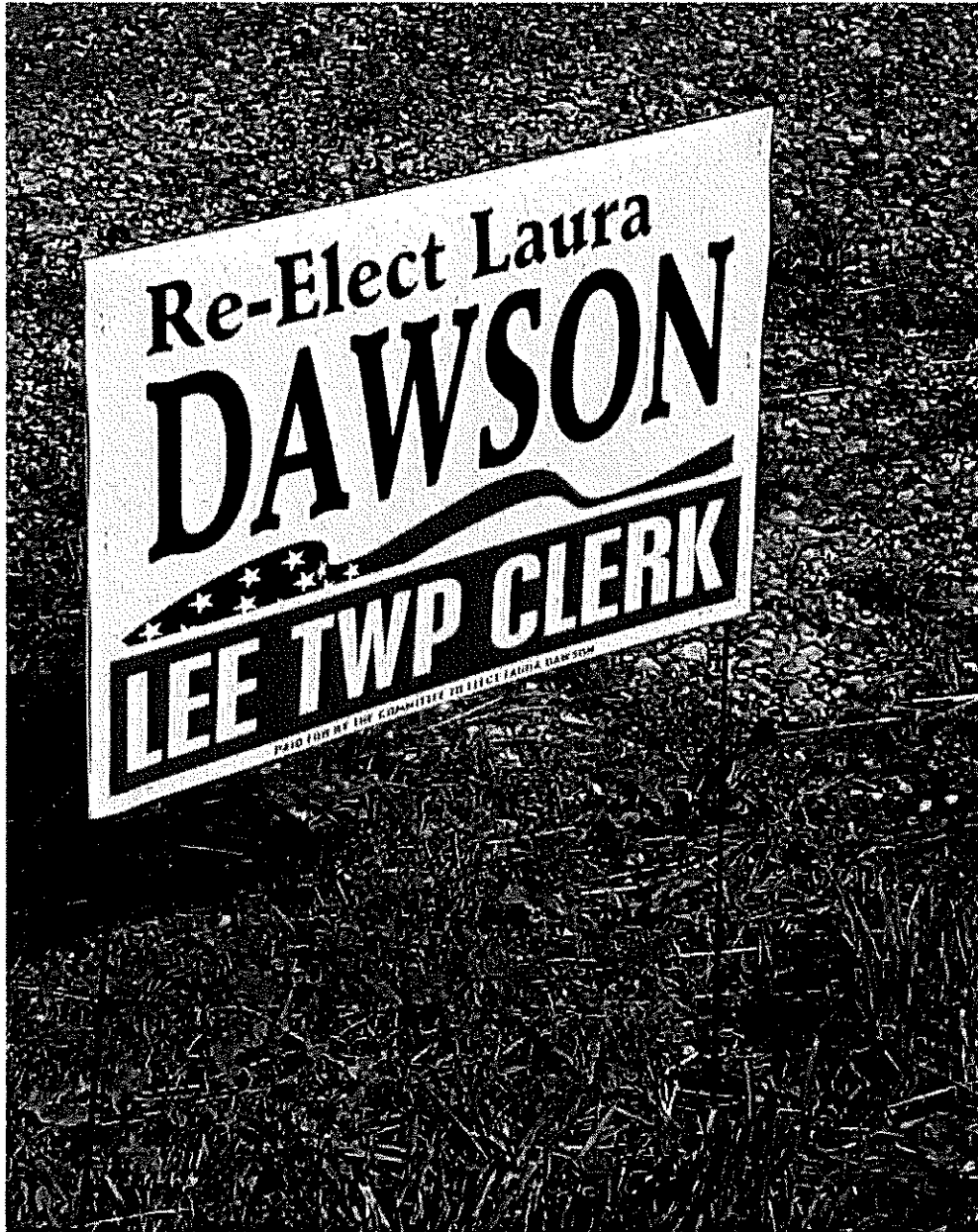


Share

**Vote 2020 Lee Township**

June 20 at 6:12 PM · Facebook for Android · 🌐

Lee Township. My first 4 yrs have been an adventure for sure. I really love "serving" LEE TOWNSHIP residents. Come on board to make OUR community a Great place to live!




Send Message



 47

1 Comment


 Like

 Share



Sandi Broyles Brabaw is at Hair Odyssey LLC.



July 13 at 4:47 PM · Midland, MI · 


Vote 2020



 2

1 Share


 Like

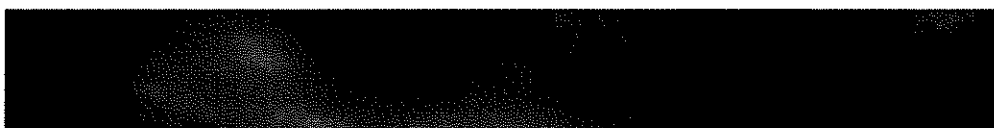
 Share



Sandi Broyles Brabaw



July 13 at 11:34 AM · 



LAURA DAWSON

Re-Elect LAURA DAWSON for Lee Township Clerk



I have served 4 years as Lee Township Clerk and have been active with the Midland County Road Commission by regularly attending meetings and have attended their yearly trainings.

I have completed the Township Governance Academy Course. Attended all annual Michigan Township Association Conferences.

I stay current by taking MTA sponsored courses.

Secretary of Lee Township Planning Commission for 6 years

Past- LEADERSHIP ROLES IN COMMUNITY ORGANIZATION

President of the Valley Herb Society -
20 year membership

Co-Organizer of the Artist's Market
at the Tridge

Downtown Midland Development Association

Midland Artist's Guild and Creative 360



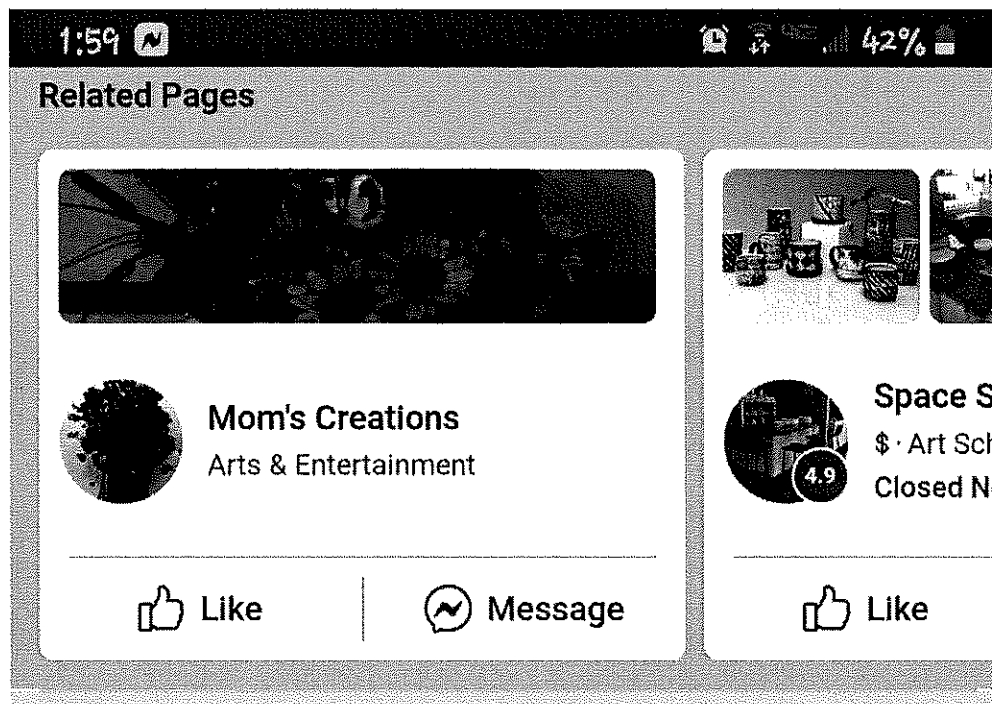
I am the current President for MCTOA (Midland County Township Officers Asociatic

dawsonlaura3@gmail.com

989.837.3250

<https://www.facebook.com/Vote-2020-Lee-Township>





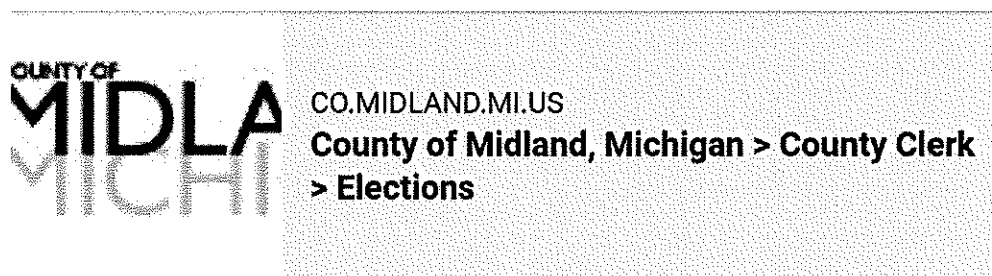
Vote 2020 Lee Township

...

July 14 at 9:56 PM · 🌐

This Face Book page was created by the Committee to Re-Elect Laura Dawson: Clerk, Geoffrey Gwisdala: Supervisor, Jessica Barber: Treasurer and Lawrence Henry: Trustee. It's purpose is to promote these 4 Candidate's. We have given you the link to the County List of candidates. Please help us help our Township. Vote August 4, 2020

<https://www.co.midland.mi.us/CountyClerk/Elections.aspx>



1 Share



Like



Comment



Share



Vote 2020 Lee Township is at Hair Odyssey LLC.

...

July 13 at 4:48 PM · Midland, MI · 🌐



Send Message

...





Replies



Author

Vote 2020 Lee Township

Margoria Letts , Lee

Township has a Blight Ordinance, it just needs to be enforced better. I don't want to tell you how to live, any more than I want some one to do that to me. There are people that have trash in their yard as well as many cars. Things that are "blight". It's fine to have "resources" as long as you don't infringe on your neighbors. Fences sure help with that. We want the township to be family oriented. We want people to respect their neighbors. Help us with ideas to make our township a desirable home base. If you would like to talk in person, feel



Write a reply...





23

6 Comments 12 Shares



Like



Comment



Share

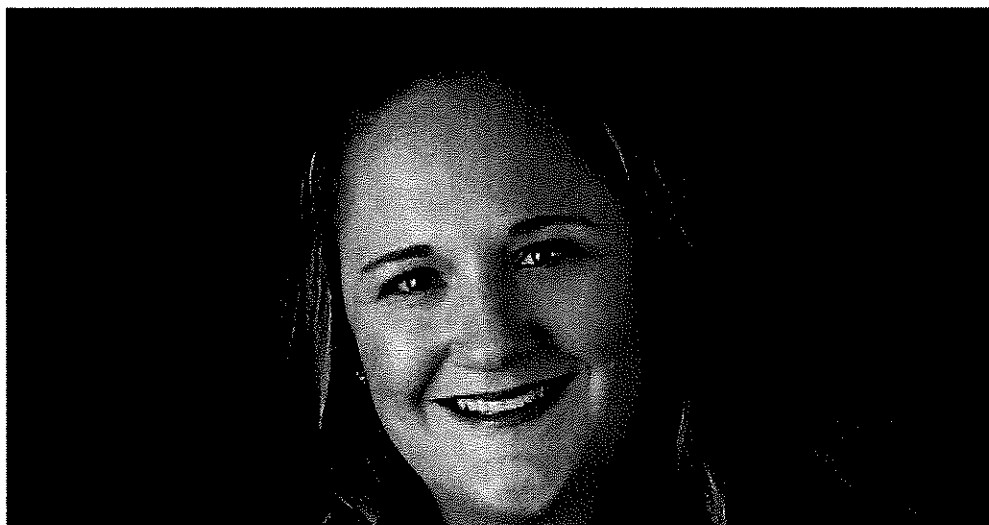


Vote 2020 Lee Township

June 27 at 12:20 PM · 🌐



[https://www.newsbreakapp.com/n/0PSLLTGx?
pd=05q5UMLx&s=i0](https://www.newsbreakapp.com/n/0PSLLTGx?pd=05q5UMLx&s=i0)



NEWSBREAK.COM

Lee Township has three contested races | News Break

For Lee Township, the only candidate running uncontested is Clerk Laur...

3

4 Comments 7 Shares



Like



Comment



Share



Vote 2020 Lee Township

June 26 at 5:26 PM · 🌐



Eric Dell question 22 Went AM Ballot?



Send Message



1 Share



Like



Comment



Share



Vote 2020 Lee Township is at Hair Odyssey LLC.



July 13 at 4:48 PM · Midland, MI ·



4



Like



Comment



Share



Vote 2020 Lee Township



July 13 at 11:32 AM ·

Everyone living in Lee Township, please educate yourselves on the candidates running for office. We really need people who



Send Message





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

July 30, 2020

Laura Dawson
2125 West Gordonville Road
Midland, MI 48640

Re: *Stewart v. Dawson*
Campaign Finance Complaint
No. 2020-07-103-47

Dear Ms. Dawson:

The Department of State (Department) has received a formal complaint alleging you have violated MCL 169.247 of the Michigan Campaign Finance Act (MCFA) by failing to include a complete and correct identification statement on certain campaign-related materials. A copy of the complaint is enclosed.

The complaint was submitted to the Department on July 16, 2020 and alleges that you have distributed yard signs that did not include a proper paid for by statement. A picture of the yard signs is included with the complaint.¹

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

Upon review, the evidence submitted supports the conclusion that a potential violation of the Act has occurred. From the outset, the Department must consider whether it is an expenditure covered by the MCFA. The yard sign specifically states "Re-Elect Laura Dawson Lee Twp Supervisor" which uses words of express advocacy as defined by the Act. MCL 169.206(2)(j). Because it urges voters to vote for you using words of express advocacy and was published by your committee, the signs are covered by the ambit of the Act and must include the paid for by

¹ The complaint raises other allegations, however, subjects outside of the MCFA cannot be the basis of a complaint filed under the Act. See MCL 169.215(5) ("[a] person may file with the secretary of state a complaint that alleges a violation *of this act* [.]")

Laura Dawson
July 30, 2020
Page 2

statement outlined under section 47. MCL 169.206(2)(j). However, while the paid for by statement is there, the signs have omitted the address of your committee. Since this is absent, the evidence supports the conclusion that a potential violation has occurred.

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

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

Note that all printed materials referencing you or your candidacy produced in the future must include this identification statement. For all materials currently in circulation, the paid for by statement must be corrected. If this information has been included in your materials and you wish to rebut the Department’s conclusion, you must respond in writing to the Department within 15 business days of the date of this letter otherwise the Department will treat the complaint as resolved.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Adam Fracassi", with a stylized flourish at the end.

Adam Fracassi
Bureau of Elections
Michigan Department of State

Enclosure
c: Tanya Stewart

SOS, Disclosure

From: Pretend Friend <pretendfriend0@gmail.com>
Sent: Thursday, July 16, 2020 12:14 PM
To: SOS, Disclosure; Pretend Friend
Subject: Complaint on Laura Dawson running for Clerk in Lee Township 2020 Election
Attachments: 1A.jpg; 2C.jpg; 3A.png; 3B.png; 4A.jpg; 7A.jpg; 7B.jpg; 7C.jpg; Complaint on Laura Dawson running for Clerk in Lee Township 2020.pdf; 2B.pdf; LD Page 1.pdf; Page 2.pdf

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

Greetings,

I am writing this complaint out to you because I fear there might be some wrong doing, and or some things might be done on the shady side of what is right and fare to all.

I scanned the pages of the complaint form and are the attachments LD Page 1 and Page 2.

I am also very concerned about the complaint being shown to the people it is agents, because I fear retaliation from them or their supporters.

I have seen the Clerk at local meetings and have seen her and those she is in league with, and those that support her or she is working their agenda. They are not nice people at all. They are the kind that stalk and harass people in the community, and use various intimidation tactics on.

I understand that I need to give you my name when filing this complaint, but I need to be assured that they will not get my name when the complaint is processed or not. Otherwise myself and my family will come under attack by these people and their cohorts.

They are very shady and run the line of the law rather curvy every chance they can. Just so you have an idea of the kind of people you will be dealing with should you look into these allegations. I hope you do, and want to be wrong, but feel deep down inside that they are not playing by the same rules as everyone else is.

And in the end that will only hurt this community more so than it already has been so far this year. Let's try to end this year on a better note that it has been so far.

Thank you very much for your time, and I'm looking forward to at the least talking with you. If there is anything else you need from me, please let me know.

Sincerely,

Tanya Stewart

[If I do not know the number you are calling from I may not answer, but please leave me a message and I will return your call as soon as I can. Or whenever works best for you.]