



Alexandria J. Taylor

+ 313-960-4339 (t)

+ 313-422-0934 (f)

[ataylor@taylawfirm.com](mailto:ataylor@taylawfirm.com)

June 23, 2020

Licensed in Michigan  
Eastern District Court of Michigan  
6<sup>th</sup> Circuit Court of Appeals

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

*Re: Complaint against Virginia Williams*

To Whom It May Concern:

Enclosed please find a Campaign Finance Complaint against Virginia Williams along with supporting documentation. Thank you.

Regards,

A handwritten signature in cursive script, appearing to read "Alexandria J. Taylor".

Alexandria J. Taylor

2020 JUN 30 PM 1:36



**Michigan Department of State**  
**Campaign Finance Complaint Form**

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

2020 JUL 30 PM 1:36

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 <b>Alexandria Taylor</b>		Daytime Telephone Number <b>313-999-1732</b>
Mailing Address <b>11210 Gabriel St.</b>		
City <b>Romulus</b>	State <b>MI</b>	Zip <b>48174</b>
Email (optional) <b>ataylor@taylawfirm.com</b>		

**Section 2. Alleged Violator**

Name <b>Virginia Williams</b>		
Mailing Address <b>35774 Abbey Dr.</b>		
City <b>Romulus</b>	State <b>MI</b>	Zip <b>48174</b>
Email (optional)		

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

Section(s) of the MCFA alleged to be violated: sec. 33 (10)(11)

Explain how those sections were violated:

Ms. Williams ended her campaign for city council in 2017 with ~\$5,000 as a balance, but did not have \$5,000 in her campaign account. She then fraudulently offset this \$5,000 with various purchases and extorted people, including me, for money that wasn't recorded.

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

See attached.

(cont.  
in  
attached)

#### Section 4. Certification (Required)

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

X

Alexander Taylor  
Signature of Complainant

6.23.2020  
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:*

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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

## **Alleged Violations by Virginia Williams of MCFA Sec. 33 (10) and (11)**

**169.233 (10))** *If a candidate, treasurer, or other individual designated as responsible for a committee's record keeping, report preparation, or report filing knowingly files an incomplete or inaccurate statement or report required by this section, that individual is subject to a civil fine of not more than \$1,000.00.*

**169.233 (11)** *If a candidate, treasurer, or other individual designated as responsible for a committee's record keeping, report preparation, or report filing knowingly omits or underreports individual contributions or individual expenditures required to be disclosed by this act, that individual is subject to a civil fine of not more than \$1,000.00 or the amount of the contributions and expenditures omitted or underreported, whichever is greater.*

### **Violation 1.**

Ms. Williams ended her campaign for City Council in 2017 with a balance of approximately \$5,000, however she did not have this \$5,000 in her account, so she fraudulently offset this balance with various purchases beginning in September of 2019, all the way into early 2020. She used the UAW strike to offset this balance; she purchased things for the UAW strike, these purchases include items from Sam's Club, Jets Pizza, and Wally's Fish and Chicken. She then inflated these purchases to 2-3 times the amount that the receipts showed to offset her balance enough so she could obtain a reporting waiver. This campaign money never existed; however, Ms. Williams fraudulently reported these purchases in order to offset this nonexistent balance.

### **Violation 2.**

In addition to the fraudulent purchases that Ms. Williams made to offset the balance in her report, she extorted various people who were seeking public office to give her money toward "UAW expenses", including myself. I gave Ms. Williams \$100 under false pretenses, and later found out this money was never recorded. Prior to that, Ms. Williams would come to my home for assistance with her campaign finance reports. I was not her treasurer for her campaign.

Ms. Williams wanted to continue to visit my family home to work on her fraudulent reports, however once I realized what was going on, I promptly put an end to my involvement. Since this happened, Ms. Williams has continued to threaten me, personally and professionally, because I know that she has fraudulently reported campaign expenses.

For evidence, please see attached text messages between me and Ms. Williams, emails from Ms. Williams, and documents regarding her campaign expenditures.

11:41



Virgina >



Wed, Oct 16, 6:51 AM

Call me

Ok. Give me a second.

Fri, Oct 18, 6:35 PM

Call me

Ok. Give me a second.

Sat, Oct 19, 6:23 PM

Hey, you at home?

Johnny there I'm at the movies with the grands. It's okay to leave it with Johnny.

Ok. I'll be there in 15 minutes. I'm leaving \$100. Is that cool?

Yes 🍷



iMessage



11:42



Virginia >

Wed, Oct 23, 5:27 PM

Let me know when I can come over

Ok. Eboni ran over which messed up my schedule. I am meeting with a client now and I have another client meeting afterwards.

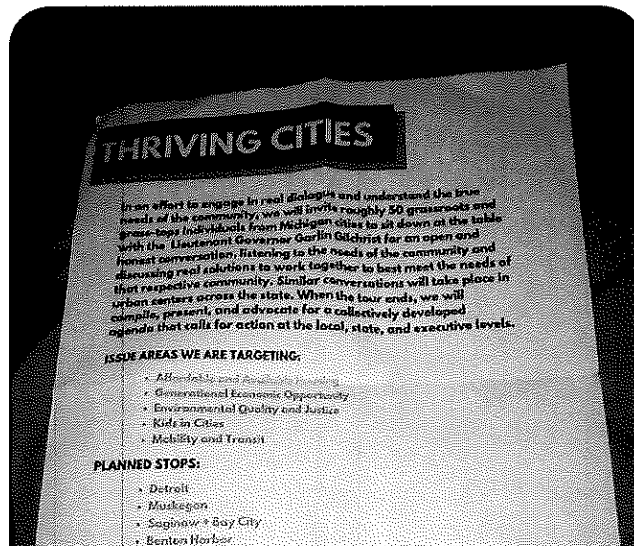
You think today?

I will let you know. I am still at the library now.

Okay, cool

I'm home 

Sun, Oct 27, 12:18 AM



iMessage



11:42 ↵



Virginia >

Fri, Jan 31, 12:33 PM

Call me

Fri, Jan 31, 3:31 PM

I am in trial

Ok

That password is not working

I change it to MEME@thom1948

I tried that one and it didn't work.

Did you try it?

I'm trying now

Did it work?

What do I file from the left of the screen

I did something so even if it's wrong it will come back for corrections.

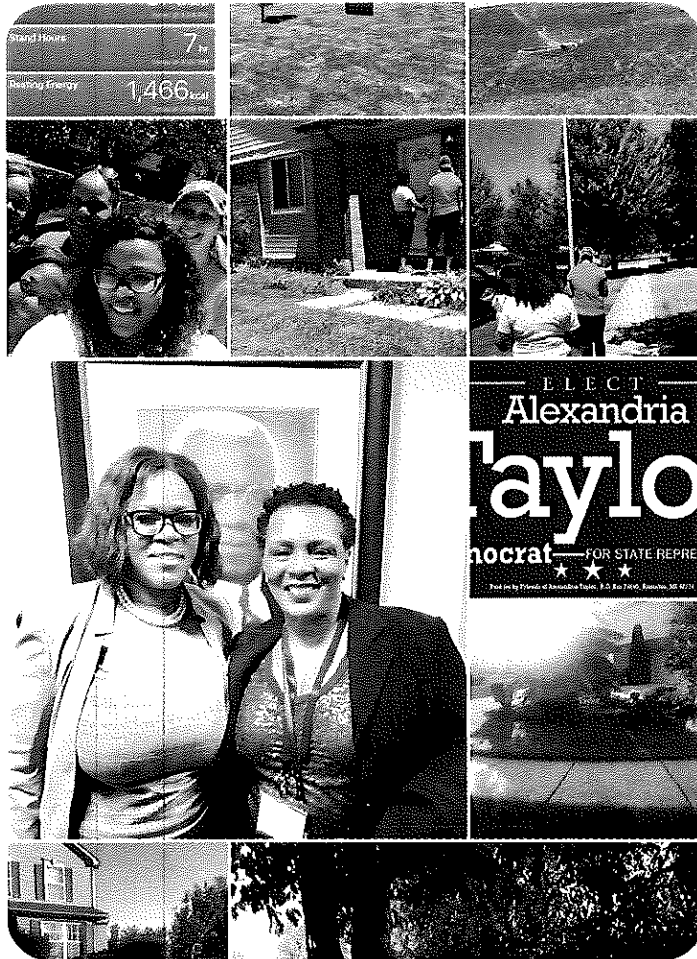
Mon, Feb 10, 2:49 PM

12:16



Virginia &gt;

Today 8:29 AM



Why would you post my picture on your page? After you choose to take part of that bull shit with the school mess.... accusing me of something I had nothing to do with.... Take my picture down NOW! You have the republican mayor support..... thinking that's will help you.... big mistake..... don't play with me as if I'm a joke. For you to turn against me for no reason or because



iMessage





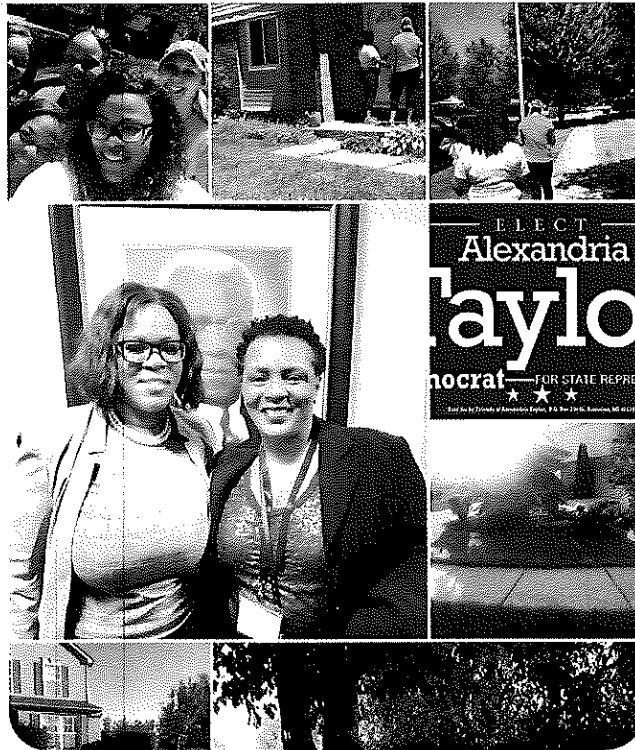
8:35

Facebook

LTE



Virginia &gt;



Why would you post my picture on your page? After you choose to take part of that bull shit with the school mess.... accusing me of something I had nothing to do with.... Take my picture down NOW! You have the republican mayor support..... thinking that's will help you.... big mistake..... don't play with me as if I'm a joke. For you to turn against me for no reason or because you are listening to Edward was heart breaking..... don't play with me I'm not a toy. Take my picture down Now



Message



From: Virginia William virg5300@yahoo.com  
Subject: Fw: Notice of Error or Omission for your October 2019 Quarterly Campaign Statement.  
Date: Nov 7, 2019 at 2:45:20 PM  
To: Alexandra Taylor alextayloresq@gmail.com

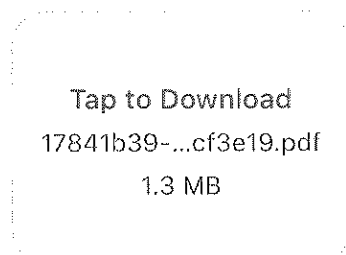
----- Forwarded Message -----

**From:** [WCCampaignFinance@co.wayne.mi.us](mailto:WCCampaignFinance@co.wayne.mi.us) <[wccampaignfinance@co.wayne.mi.us](mailto:wccampaignfinance@co.wayne.mi.us)>  
**To:** "[wccampaignfinance@co.wayne.mi.us](mailto:wccampaignfinance@co.wayne.mi.us)" <[wccampaignfinance@co.wayne.mi.us](mailto:wccampaignfinance@co.wayne.mi.us)>  
**Sent:** Thursday, November 7, 2019, 12:03:48 PM EST  
**Subject:** Notice of Error or Omission for your October 2019 Quarterly Campaign Statement.

Dear Ms. Williams,

Notice of Error or Omission for your October 2019 Quarterly Campaign Statement.

Best regards,  
Amirah Jackson-Barrett  
Campaign Finance Analyst  
313-224-0169





# Office of the County Clerk

Elections Division

Cathy M. Garrett  
Wayne County Clerk

DATE: November 6, 2019

ID #82-156768

CTE Virginia Williams for Romulus City Council  
35774 Abbey Dr.  
Romulus, MI 48174

Dear Committee:

There is a question about your **CAMPAIGN STATEMENT (S)** regarding the following schedule(s), which have not been properly completed:

- |   |   |
|---|---|
| <input type="checkbox"/> Cover Page                       | <input type="checkbox"/> Summary Page                               |
| <input type="checkbox"/> 1A Itemized Direct Contributions | <input checked="" type="checkbox"/> 1B Itemized Direct Expenditures |
| <input type="checkbox"/> Blank                            | <input type="checkbox"/> Blank                                      |
| <input type="checkbox"/> 1A-1 Itemized (other receipts)   | <input type="checkbox"/> I-C Incidental Disbursements               |
| <input type="checkbox"/> 1-IK In-Kind Contributions       | <input type="checkbox"/> 1B-G Get Out the Vote Expend               |
| <input type="checkbox"/> 1E Debts/Obligations             | <input type="checkbox"/> 1B-K Itemized In-Kind Expend               |
| <input type="checkbox"/> 1F Fund Raiser Schedule          |   |

NOTE: SEE ATTACHED REPORT

Please review the attached report and make the necessary corrections in a filed amendment to the Statement(s) listed. The amendment(s) are due on line no later than 9 business days from date of this notice (**Due on November 19, 2019**).

If we do not receive a response to this notice by the above due date, see enclosed MCL 169.233, which requires this office to refer the matter to the Attorney General.

Should you have any questions please give me a call at (313) 224-0169 or email at [wccampaignfinance@waynecounty.com](mailto:wccampaignfinance@waynecounty.com).

Sincerely,

*Amirah Jackson - Barrett*

Amirah Jackson - Barrett  
Campaign Finance Analyst  
Wayne County Clerk's Office

cc: file, scan, mail, email & treasurer  
Rev: 3/2017

**NOTICE OF ERROR OR OMISSION**  
**OCTOBER 2019 QUARTERLY CAMPAIGN STATEMENT**

**COVER PAGE**

- No other changes are required.

**DIRECT EXPENDITURES**

- Please clarify the 16 expenditure(s) made from the Candidate Committee to **Wally's Fish and Chicken (4), Jets Pizza (2), Subway (2), and Sams Club (8)**. The expenditure purpose was described as **"Contribution to Charity"**.

**NOTE: TO AMEND YOUR ON LINE CAMPAIGN STATEMENT**

- Select: **Amend Transactions** for filed Campaign Statements
- Select: Reporting Period Name of **"10/20/2019 Quarterly"**
- Select: **SEARCH** to see your reported data
- Select: **"Actions (blue edit box)"** to amend that line item (if needed).
- Please Note: **You must file the amended campaign statement for the changes to be reported.**
- If you have any questions, please contact our office.

Transaction Date	Contributor / Payee Name	Transaction Type	Transaction Category	Amount	Address
10/18/2019	Wallys Fish and Chicken	Expenditure	Direct	\$130.00	5756 S. Merrian Rd., Wayne, MI 48184
10/12/2019	Wallys Fish and Chicken	Expenditure	Direct	\$130.00	5756 S. Merrian Rd., Wayne, MI 48184
10/09/2019	Jets Pizza	Expenditure	Direct	\$60.00	35681 Van Born Rd., Romulus, MI 48174
10/07/2019	Subway	Expenditure	Direct	\$140.00	27416 Ecorse Rd., Romulus, MI 48174
10/04/2019	Wallys Fish and Chicken	Expenditure	Direct	\$130.00	5756 S. Merriman Rd., Wayne, MI 48184
09/25/2019	Jets Pizza	Expenditure	Direct	\$60.00	35681 Van Born Rd., Romulus, MI 48174
09/21/2019	Subway	Expenditure	Direct	\$140.00	27416 Ecorse Rd., Romulus, MI 48174
09/20/2019	Wally Fish and Chicken	Expenditure	Direct	\$130.00	5756 S. Merriman Rd, Wayne, MI 48184
10/16/2019	Sams Club	Expenditure	Direct	\$259.00	39800 Ford Rd, Canton, MI 48187
10/16/2019	Sams Club	Expenditure	Direct	\$698.00	39800 Ford Rd, Canton, MI 48187
10/16/2019	Sams Club	Expenditure	Direct	\$339.00	39800 Ford Rd, Canton, MI 48187
10/18/2019	Sams Club	Expenditure	Direct	\$379.00	39800 Ford Rd, Canton, MI 48187
09/20/2019	Sams Club	Expenditure	Direct	\$65.00	39800 Ford Rd, Canton, MI 48187
09/20/2019	Sams Club	Expenditure	Direct	\$65.00	39800 Ford Rd, Canton, MI 48187
09/20/2019	Sams Club	Expenditure	Direct	\$40.43	39800 Ford Rd, Canton, MI 48187
09/20/2019	Sams Club	Expenditure	Direct	\$398.00	39800 Ford Rd, Canton, MI 48187
09/20/2019	Best Buy	Expenditure	Direct	\$34.95	35100 Central City Pkwy, Westland, MI 48185
09/20/2019	Best Buy	Expenditure	Direct	\$1,001.62	35100 Central City Pkwy, Westland, MI 48185

From: Virginia William virg5300@yahoo.com  
Subject: Information  
Date: Jan 30, 2020 at 9:03:15 AM  
To: Alexandra Taylor alextayloresq@gmail.com

Virginia Williams  
ID 82=156-768  
MEME@ham1948

From: Virginia William virg5300@yahoo.com

Date: Jan 31, 2020 at 3:29:49 PM

To: Alexandra Taylor alextayloresq@gmail.com

82-156768

MEME@thom1948

From: Virginia William virg5300@yahoo.com  
Subject: WAYNE COUNTY FINANCE  
Date: Jan 31, 2020 at 3:30:34 PM  
To: Alexandra Taylor alextayloresq@gmail.com

----- Forwarded Message -----

**From:** Virginia William <virg5300@yahoo.com>  
**To:** Alexandra Taylor <alextayloresq@gmail.com>  
**Sent:** Friday, January 31, 2020, 03:29:44 PM EST  
**Subject:**

82-156768

MEME@thom1948





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

July 24, 2020

Virginia Williams  
35774 Abbey Drive  
Romulus, MI 48174

Re: *Taylor v. Williams*  
Campaign Finance Complaint  
No. 2020-06-55-33

Dear Ms. Williams:

The Department of State (Department) received a formal complaint filed by Alexandria Taylor against you alleging violations of 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.

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).

Ms. Taylor alleges that you have improperly filed campaign finance reports and have improperly spent committee funds on personal expenses.

The purpose of this letter is to inform you of the Department's examination of these matters and your right to respond to the allegations before the Department proceeds further. It is important to understand that the Department is neither making this complaint nor accepting the allegations as true. The investigation and resolution of this complaint is governed by section 15 of the Act and the corresponding administrative rules, R 169.51 *et seq.* An explanation of the investigation process is enclosed with this letter and a copy is available on the Department's website.

**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. Due to the ongoing public health emergency, the Department asks that all materials be submitted via email to [Elections@Michigan.gov](mailto:Elections@Michigan.gov) to my attention. 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 Ms. Taylor, 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 criminal penalty provided in section 33(11) of the Act.

If you have any questions concerning this matter, you may contact me via email.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam Fracassi". The signature is fluid and cursive, with the first name "Adam" and last name "Fracassi" clearly distinguishable.

Adam Fracassi  
Bureau of Elections  
Michigan Department of State

c: Alexandria Taylor



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

May 28, 2021

**SECOND NOTICE**

Virginia Williams  
35774 Abbey Drive  
Romulus, MI 48174

*Via Certified mail*

Re: *Taylor v. Williams*  
Campaign Finance Complaint  
No. 2020-06-55-33

Dear Ms. Williams:

By correspondence dated July 24, 2020, the Department of State (Department) advised you of its intention to investigate a complaint filed against you by Alexandria Taylor concerning alleged violations of the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.201 et seq. A copy of the Department's notice is enclosed with this letter.

The notice informed you that, pursuant to section 15(5) of the MCFA, MCL 169.215(5), the Department is reviewing whether you failed to comply with the requirements of the Act. The Committee was provided an opportunity to respond to these allegations within 15 business days of your receipt of the notice, but to date no response has been filed on your behalf.

**By this letter, the Department is providing you a final opportunity to submit a written response to the enclosed notice.** Your response may include any documentary evidence you wish to submit and must be received by the Department on or before **June 21, 2021**. All materials must be sent to the Bureau of Elections, Michigan Department of State, Richard H. Austin Building, 430 West Allegan Street, Lansing, Michigan 48918.

Failure to submit a written response to this second notice will leave the Department no alternative but to make its determination based solely on the documentation furnished by Ms. Taylor.

Sincerely,

Adam Fracassi  
Bureau of Elections  
Michigan Department of State

# LAW OFFICES OF JOHN O. KNAPPMANN

20600 EUREKA SUITE 720, TAYLOR, MICHIGAN 48180

RECEIVED/FILED  
MICHIGAN DEPT OF STATE  
2021 JUN 22 AM 11:34  
ELECTIONS/GREAT SEAL

June 14, 2021

Mr. Adam Fracassi  
Director, Bureau of Elections  
Michigan Secretary of State  
430 W. Allegan  
Lansing, MI 48918

Re: Taylor v. Williams No. 2020-06-55-33

Dear Sir,

Please accept the following as Ms. Williams' response to the Complaint alleging violations of the Michigan Campaign Finance Act in the above-referenced matter.

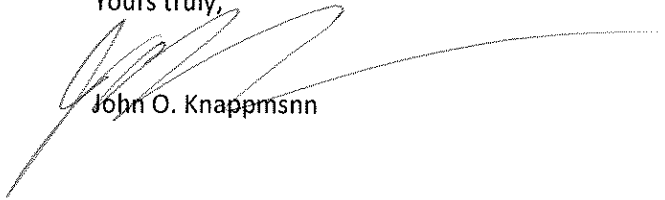
Mrs. Williams categorically denies the allegations that she "extorted people" during or after her campaign for Romulus City Council. Nor did anyone acting on her behalf or at her direction. Although Mrs. Taylor provided some alleged cell phone texts, they do nothing to establish any of that.

Mrs. Williams also categorically denies any allegations that she falsified campaign finance reports. This did not happen. It is noteworthy that Mrs. Taylor includes the fact that she was assisting Mrs. Williams in preparing reports and keeping records. Mrs. Williams relied upon Mrs. Taylor's knowledge and judgement as a lawyer and upon her volunteer campaign accounting work even though Mrs. Taylor would not sign as a Treasurer or Record Keeper on any official forms.

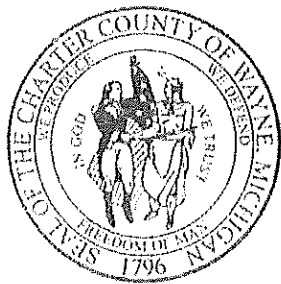
Mrs. Williams has donated to charitable efforts and continues to do so to this day. What she does not do is break the law.

Please call with any questions or concerns. Mrs. Williams looks forward to your dismissal of this baseless and venomous complaint. Please see attached a letter from the Wayne County Clerk indicating her compliance as far as they are concerned. Thank you for your time and attention.

Yours truly,

  
John O. Knappmann

Attachment



# Office of the County Clerk

## Elections Division

**Cathy M. Garrett**  
Wayne County Clerk

April 1, 2021

ID #82-156768  
CTE Virginia Williams for Romulus City Council  
35774 Abbey Dr.  
Romulus, MI 48174

Councilwoman Williams,

Hope this letter finds you well. My office received your inquiry regarding any outstanding issues related to your candidate committee. A review by the Wayne County Clerk's Campaign Finance Division has found that as of this date you are in compliance, that all statements, reports, late filing fees, and fines due from your Candidate Committee organized under the Michigan Campaign Finance Act, PA 388 of 1976, have been filed or paid.

You additionally asked for assistance from the County Clerk's office on finding out the status of a complaint filed with the Secretary of State against your committee on June 30<sup>th</sup>, 2020 and stated you had responded to the State with a rebuttal on August 5<sup>th</sup>, 2020. The County Clerk's office did contact the State's Campaign Finance Division on March 18<sup>th</sup>, 2021 and March 31<sup>st</sup>, 2021, regarding the status of the campaign finance complaint, *Taylor v. Williams* #2020-06-55-33, filed against your committee. The State responded on March 31, 2021 that the determination was still pending. Please note, MCL 169.215(10) stipulates, "No later than 45 business days after receipt of a rebuttal statement submitted under subsection (5), or if no response or rebuttal is received under subsection (5), the secretary of state shall post on the secretary of state's Internet website whether or not there may be reason to believe that a violation of this act has occurred."

If you have any questions, please feel free to contact the office at 313-224-5525.

Best regards,

Cathy M. Garrett  
Wayne County Clerk





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

July 30, 2021

Alexandria Taylor  
19 Clifford Street, Floor 8  
Detroit, MI 48226

Dear Ms. Taylor:

The Department of State received a response to the complaint you filed against Virginia Williams, 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, 1<sup>st</sup> 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: John Knappmann



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

January 7, 2022

Virginia Williams  
35774 Abbey Drive  
Romulus, MI 48174

Re: *Taylor v. Williams*  
Campaign Finance Complaint  
No. 2020-06-55-33

Dear Ms. Williams:

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

The complaint alleges that you improperly used campaign funds. Specifically, the complaint alleges that you misreported the balance of your committee accounts in campaign finance reports filed with the Wayne County clerk, and the complaint also alleges that you made several improper purchases using campaign funds. The complaint includes as evidence a Notice of Error or Omission issued by the Wayne County Clerk on November 6, 2019 regarding your October 2019 quarterly campaign finance statement.

You have responded to the complaint. In your response, you denied the complaint's allegations in full. Your response included an April 1, 2021 letter from the Wayne County Clerk stating that your candidate committee was fully in compliance with the MCFA and that all required filings have been made. Additionally, a December 3, 2019 letter from the Wayne County Clerk's Office, available online, indicates that your November 19, 2019 response to the November 5, 2019 Notice of Error or Omission was sufficient to remedy the concerns expressed in the Notice.<sup>1</sup>

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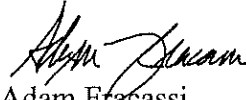
<sup>1</sup> Letter from Amirah Jackson-Barrett to CTE Virginia Williams for Romulus City Council, Dec. 3, 2019, available on the Wayne County Campaign Finance Information System.

In Michigan, filing officials are responsible for determining whether statements or reports filed under the MCFA comply with the law. MCL 169.216(6). In local races occurring entirely within one county, the county clerk is the relevant filing official. MCL 169.236(6).

The Department has reviewed the evidence submitted in this matter and concluded that insufficient evidence has been submitted to support a finding that a potential violation of the MCFA has occurred. The Wayne County Clerk is the relevant filing official for MCFA reports for city council elections in the City of Romulus. By both the December 3, 2019 letter and the April 1, 2021 letter, the Wayne County Clerk has stated that the required filings you have made to comply with the MCFA complied with the law.

Because neither of violations of the MCFA alleged in the complaint has been substantiated by sufficient evidence, the Department dismisses the complaint and will take no further enforcement action.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam Fracassi", is positioned above the printed name.

Adam Fracassi  
Regulatory Manager

c: Alexandra Taylor