

## 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 <b>David Bloom</b>		Daytime Telephone Number <b>734 604 3588</b>	
Mailing Address <b>19400 Sibley Road</b>			
City <b>Chelsea</b>	State <b>MI</b>	Zip <b>48118</b>	

Section 2. Alleged Violator			
Name <b>ROSS GREENSTEIN FOR CHELSEA SCHOOL BOARD</b>			
Mailing Address <b>1885 WESTBOURNE CT.</b>			
City <b>Chelsea</b>	State <b>MI</b>	Zip <b>48118</b>	

Section 3. Alleged Violations (Use additional sheet if more space is needed.)
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Section(s) of the MCFA violated:

**MCFA Section 169.247**

Explain how those sections were violated:

**Noncompliant Signage Disclaimer, Section 47(2)(b)**

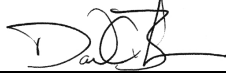
Evidence that supports those allegations (attach copies of pertinent documents and other information):

**Attached**

**Section 4. Certification (Required)**

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

X



Signature of Complainant

September 18, 2022

Date

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

**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:*

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.**

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

## COMPLAINT PROCESS

[Section 15](#) of the MCFA governs the filing and processing of complaints. If you believe someone has violated the MCFA, you may file a written complaint. The complaint **must** include all of the following:

- Your name, address and telephone number.
- The alleged violator's name and address.
- A description in reasonable detail of the alleged violation, including the section or sections of the MCFA you believe were violated, an explanation of how you believe the MCFA was violated, and any other pertinent information.
- Evidence which supports your allegations.
- A certification that:

***To the best of your knowledge, information, and belief, formed after a reasonable inquiry under the circumstances, each factual contention of the complaint is supported by evidence.***

- If after a reasonable inquiry under the circumstances, you are unable to certify that certain specifically identified factual contentions of the complaint are supported by evidence, you may also certify that:

***To the best of your knowledge, information, or belief, there are grounds to conclude that those specifically identified factual contentions are likely to be supported by evidence after a reasonable opportunity for further inquiry.***

- Your signature immediately after the certification or certifications.

**WARNING:** Section 15(8) of the MCFA (MCL 169.215) provides that a person who files a complaint with a false certification is responsible for a civil violation of the MCFA. Under section 15(16) of the MCFA (MCL 169.215), the Secretary of State may require a person who files a complaint with a false certification to:

- Pay the Department some or all of the expenses incurred by the Department as a direct result of the filing of the complaint.
- Pay the alleged violator some or all of the expenses, including, but not limited to, reasonable attorney fees, incurred by that person as a direct result of the filing of the complaint.
- Pay a civil fine of up to \$1,000.00.

A complaint may be dismissed if any required information is not included, or if the complaint is determined to be frivolous, illegible, or indefinite. All parties are notified of dismissed complaints.

When a complaint meets the above requirements, the Department notifies the alleged violator that a complaint has been filed and provides a copy of the complaint. The alleged violator will have an opportunity to file a response. The complaint filer will have an opportunity to file a rebuttal to any response. All parties receive periodic reports concerning the actions taken by the Department on a complaint.

If the Department finds no reason to believe that the allegations are true, the complaint will be dismissed.

If the Department finds that there may be reason to believe your allegations are true, the Department must attempt to correct the violation or prevent further violations by informal methods such as a conference, conciliation, or persuasion, and may enter into a conciliation agreement with the alleged violator.

If the Department is unable to correct the violation or prevent further violations informally, an administrative hearing may be held to determine whether a civil violation of the MCFA has occurred, or the matter may be referred to the Attorney General for the enforcement of criminal penalties. An administrative hearing could result in the assessment of a civil penalty. Such a hearing would be conducted in accordance with the Michigan Administrative Procedures Act. An order issued as a result of such a hearing may be appealed to the appropriate circuit court.

Accepted complaints and all supporting documentation including responses and rebuttal statements are made available on the Department's website as required by the MCFA at the conclusion of the process.

Questions? Contact us at:

Michigan Department of State  
Bureau of Elections  
Richard H. Austin Building – 1st Floor  
430 West Allegan Street  
Lansing, Michigan 48918  
Phone: 517-373-2540  
Email: [Disclosure@Michigan.gov](mailto:Disclosure@Michigan.gov)

**VOTE November 8th**



*Elect*  
**ROSS  
GREENSTEIN**

[www.Greenstein4csb.com](http://www.Greenstein4csb.com)

**Chelsea School Board**

Paid for by Greenstein for CSB





MICHIGAN DEPARTMENT OF STATE  
BUREAU OF ELECTIONS

ORIGINAL OR AMENDED

STATEMENT OF ORGANIZATION FORM FOR LOCAL CANDIDATE COMMITTEES FILED WITH A COUNTY CLERK  
Information on this form is made public.

C-2022-044  
2022-101

1. Committee ID #: 2022-101

2. Type of Filing: ☐ Original  
☒ Amendment to items: **Treasurer**

Eff. Date: **07/01/2022**

3. Full Name of Committee (must include Candidate's first and last name):  
**Ross Greenstein for Chelsea School Board**

4a. Candidate Full Name: Last Name **Greenstein** First Name **Ross** M.I.

4b. Political Party (if applicable): **NA**

4c. County of Residence: **WASHTENAW**

4d. Office Sought: **Chelsea School Board**

4e. District or Jurisdiction: **Chelsea School**

5. Date Committee was Formed: **06/06/2022**

6a. Committee Phone: **(517) 740-2241**

6b. Committee Fax #:

6c. Committee Email Address: **Greenstein4csb@gmail.**

6d. Committee Website Address: **Greenstein4CSB.com**

7a. Complete Committee Mailing Address (May be PO Box):  
**1885 Westbourne Ct. Chelsea Mi 48118**

7b. Complete Committee Street Address (May not be PO Box):  
**1885 Westbourne Ct. Chelsea Mi 48118**

8. Treasurer Name and Complete Address:  
**Lindsay Greenstein 1885 Westbourne Ct. Chelsea, Mi 48118**

Phone #: **(734) 216-2354** Email Address: **lmheff78@gmail.com**

9. Designated Record Keeper Name and Complete Address:

Phone #:  Email Address:

10. REPORTING WAIVER REQUEST:  
☐ YES, I/We WANT TO APPLY FOR THE REPORTING WAIVER. The committee does not expect to receive or expend in excess of \$1,000 in an election. I/We understand that if the committee does not spend or received in excess of \$1,000 in an election, the committee does not owe Pre, Post and Quarterly Campaign Statements. I/We further understand that the Reporting Waiver will be automatically lost if the committee exceeds the \$1,000 threshold and all required campaign statements must be filed. A Reporting Waiver does not exempt a committee from filing Late Contribution Reports.

☒ NO, I/We DO NOT WANT TO APPLY FOR THE REPORTING WAIVER. The committee expects to receive or expend in excess of \$1,000 in an election. I/We understand that the committee owes Pre, Post, Quarterly Statements even if the committee does not spend or receive in excess of \$1,000 in an election. I further understand that the Reporting Waiver cannot be requested retroactively to avoid filing requirements and to avoid paying late filing fees. Further information regarding Reporting Waivers can be found in Appendix C of the Committee Manual.

11. Name and Address of Depositories or Intended Depositories of committee funds (Michigan Bank, Credit Union or Savings & Loan Association) While this item must be completed, an account does not have to be opened until the first contribution is received.

\*Official Depository (name and address): **Chelsea State Bank 1010 S. Main St Chelsea, Mi 48118**

Secondary Depository (name and address):

12. 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 campaign statements 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)

\*Candidate:  Date:

\*Current Treasurer: **[Signature]** Date: **08/04/2022**

\*Designated Record Keeper (If Applicable):  Date:

WASHTENAW COUNTY, MI  
FILED 2022 AUG 30 AM 9:48  
LAWRENCE KESTENBAUM  
COUNTY CLERK / REGISTER



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

September 21, 2022

Ross Greenstein for Chelsea School Board  
1885 Westbourne Ct  
Chelsea, MI 48118

Re: *Bloom v. Ross Greenstein for Chelsea School Board*  
Campaign Finance Complaint No. 2022 - 9 - 120 - 47

Dear Mr. Greenstein:

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 an identification statement on campaign signs. A picture of the sign is included with the complaint; a copy of the complaint is enclosed.

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

Upon review, the evidence submitted supports the conclusion that a potential violation of the Act has occurred. From the outset, the Department must consider whether the materials fall within the ambit of the MCFA. Because the materials explicitly advocate for the election or defeat of a candidate, or for the passage or defeat of a ballot proposal, the materials contain express advocacy as defined by the Act. MCL 169.206(2)(j). As explained above, such materials must contain a "paid for by" statement listing the name and address of the committee purchasing the materials. However, the evidence shows that the materials at issue here omit part or all of that required statement. That absence supports the conclusion that a potential violation of the MCFA has occurred.

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

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

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

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

Sincerely,

Regulatory Section  
Bureau of Elections  
Michigan Department of State

Enclosure  
c: David Bloom



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**From:** MDOS-BOERegulatory  
**Sent:** Thursday, September 29, 2022 4:52 PM  
**To:** Ross Greenstein  
**Subject:** RE: Campaign finance complaint No 2022-9-120-47

Dear Mr. Greenstein

The Department is receipt of your email regarding the Section 47 warning you received due to the omission of your address on your yard signs. Thank you for the description of your efforts to correct the omission and to ensure that it is not continued in further signage. As for your concern that some signs may not be recoverable, that is a common and understandable issue. We would ask you to take reasonable efforts to correct the omission but understand that you might not be able to track down and correct every sign.

Regulatory Section  
Bureau of Elections  
Michigan Department of State

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**From:** Ross Greenstein <greenstein4csb@gmail.com>  
**Sent:** Thursday, September 29, 2022 2:56 PM  
**To:** MDOS-BOERegulatory <MDOS-BOERegulatory@michigan.gov>  
**Cc:** ross greenstein <rgreensteinpa@gmail.com>  
**Subject:** Campaign finance complaint No 2022-9-120-47

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

To Whom it may concern:

The signs ordered for my School Board campaign, contain a disclaimer; Paid for by Greenstein for Chelsea School Board and website for contact purposes, but do not include the address of my campaign.

I apologize as this was an honest mistake and I interpreted my signs to be in compliance with a way to contact me (website) This, however, does appear to be in violation of the act. This is my first campaign and in no way an attempt to deceive individuals.

Upon learning about this violation, even prior to this complaint, I had corrected and placed stickers with my full disclaimer on them and corrected my next sign order.

Paid for by Ross Greenstein for Chelsea School Board, 1885 Westbourne ct. Chelsea, Mi. 48118

In the letter received 9/21, from your office, it also indicates all materials in circulation must be corrected. I am currently circulating a sticker with the proper "paid for by" disclaimer on them. Some signs were taken by people at fundraising events - I will do my best to locate those as well and put on a corrected sticker.

I am concerned that I may not find every sign and another complaint will be sent in. Do you have any advice that you could pass along? Any suggestions you can provide on my full compliance would be greatly appreciated.

Sincerely,

Ross Greenstein