

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

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.*).

Please print or type all information.

I allege that the MCFA was violated as follows:

| | | |
|--|--------------------|---|
| Section 1. Complainant | | |
| Your Name <i>Carrie Lasley</i> | | Daytime Telephone Number <i>502-645-0421</i> |
| Mailing Address <i>2725 Norwalk</i> | | <i>e-mail: cbilasley@gmail.com</i> |
| City <i>Hamtramck</i> | State <i>MI</i> | Zip <i>48212</i> |

| | | |
|--|--------------------|-----------------------------|
| Section 2. Alleged Violator | | |
| Your Name <i>m.hassan@hamtramckcity.com 313-775-5129</i> <i>hassanm492@gmail.com 586-424-3955</i> <i>313-352-7748</i> <i>Mohammed Hassan and Scott Klein</i> | | |
| Mailing Address <i>2425 Neibel / 30016 Adorne Dr</i> | | |
| City <i>Hamtramck / Novi</i> | State <i>MI</i> | Zip <i>48212 / 48377</i> |

| |
|--|
| Section 3. Alleged Violations (Use additional sheet if more space is needed.) |
|--|

Section(s) of the MCFA violated: *1) 169.224 2) 169.225 3) 169.226 4) 169.234 5) 169.257(3)*

Explain how those sections were violated: *1) Failed to file Statement of Organization despite a committee being formed. First ad buy no later than 9/27. 2) Statements not filed despite evidence of expenditure 3) No expenditures or donations filed despite evidence of expenditure and expenses that the two affiliated parties would be unlikely to be able to cover from their own salaries 4) No campaign statement has been filed with Wayne County Clerk 5) Councilman Hassan is disseminating Robotexts within body of a ballot question with his own money in theory, part of which is council salary*

Narrative and Evidence

An overview of my complaints listed specifically in the previous page is that Hamtramck Councilman Mohammed Kamrul Hassan and Novi resident Scott Alan Klein, and possibly others formed a committee called Keep Hamtramck no later than September 2020. They have never filled a campaign statement, Statement of Organization, or any details about their expenses or possible donations despite those donations clearly costing more than \$1,000.

I will start by establishing that Hassan and Klein are members of the committee before I establish the committee's actions.

First is the Affidavit of Identity that Mohammed Hassan filed in 2019 declaring that he is the occupant at 2425 Neibel, Hamtramck, MI 48212.

AFFIDAVIT OF IDENTITY AND RECEIPT OF FILING
PLEASE COMPLETE SECTIONS I, II, III AND IV BELOW (Print or Type) - See Reverse Side for Important Notifications

| | | |
|-------------------------|---|---|
| OFFICE (USE ONLY) | Received by: <u>August</u> Reviewed by: <u>August</u> Jurisdiction/District of Office Sought: <u>Hamtramck City Council</u> | No. of Petition Sheets or Receipts: <u>1</u> Date of Filing: <u>APR 22 2019</u> CFR ID No.: <u>181213</u> |
|-------------------------|---|---|

I. CANDIDATE IDENTIFICATION
Name: MOHAMMED HASSAN (Last) (First) (Middle)
Birth date: 08-31-1967
Have you changed your name within the last 10 years for reasons other than marriage (or divorce)? ☐ Yes ☒ No
If yes, enter full former name here (See "Section A" on reverse):
I WISH TO HAVE MY NAME APPEAR ON THE BALLOT AS PRINTED BELOW (Please print upper & lower case - nicknames/aliases not permitted. See "Sec. B" on reverse.)
M O H A M M E D H A S S A N
Residence Address (Street Address, City, Zip Code): 2425 NEIBEL ST
HAMTRAMCK, MI 48212
Mailing Address (See "Section C" on reverse): SAME
Phone: 313, 775 5727 Email: hassanm492@gmail.com
☒ City ☐ Township of Hamtramck Precinct # 2 and Ward # (if any) NA
I meet the statutory and constitutional requirements for the office sought: ☒ Yes ☐ No
I am a citizen of the United States: ☒ Yes ☐ No
I am registered and qualified to vote at the address listed above: ☒ Yes ☐ No

II. OFFICE SOUGHT
Office Title: Council member District/Circuit # (if applicable): N/A
Date of Election: Primary Election: 08-06-2019 General Election: 11-05-2019 Recall: ☐
If a partisan office, list political party: N/A (None, Filing a Qualifying Petition for No Party Affiliation)
Term of Office: ☒ Regular Term ☐ Partial Term: Expiring 11-05-2019
Jurisdiction/Candidate Only (See "Section D" on reverse): ☐ Incumbent Position ☐ Non Incumbent Position ☐ New Jurisdiction

III. FILER'S ACKNOWLEDGMENT - This filing contains the following (check all that apply):
☐ Nominating or Qualifying Petition (Estimated number of signatures: _____)
☒ Filing Fee of \$500.00 (if applicable)
☐ Certification of Party Nomination and Certification of Acceptance (if applicable)
☐ Affidavit of Constitutional Qualification (candidate candidates only)
☐ Affidavit of Candidacy (incumbent petition candidates only)
If nominating petitions are filed:
☐ Destroy petitions in January
☒ Return petitions in January

IV. CAMPAIGN FINANCE COMPLIANCE STATEMENT AND ATTESTATION
By signing this affidavit, I swear (or affirm) that the facts I have provided are true. (Further swear (or affirm) that the facts contained in the statement set forth below are true. (See "Section E" on reverse for further information).
At this date, all statements, reports, late filing fees, and fines due from me or any Candidate Committee organized to support my election to office under the Michigan Campaign Finance Act, PA 184 of 1978, have been filed or paid.
I acknowledge that making a false statement in this affidavit is perjury - a felony punishable by a fine up to \$1,000.00 or imprisonment for up to 5 years, or both. (M.C.L. 18A.556, 553 and 558)

SIGNATURE OF CANDIDATE: Mohammed Hassan
Subscribed and sworn to before me on the _____ day of _____, 2019.
Name of Notary: Armenian
Notary Public, State of Michigan, County of Wayne
My commission expires: 04/01/2024
My Commission Expires Sept. 1, 2019
Acting in the County of Wayne
Michigan Department of State ORIGINAL FILING OFFICIAL COPY CANDIDATE

This is the address affiliated with the Web site mimaps.org. as shown in the screen grabs below taken on 10/27/2020. On this web site, the address that Hassan declares under punishment of perjury is the purchaser of the web site and, I assume, the Web design. There has been no filing related to this Web

site.

Website

Message (required)

Submit

paid for by mimaps 2425 neibel Hamtramck MI 48212

★ 10
Ex 16171373144703

REFORM HAMTRAMCK PUBLIC SAFETY VOTE - Blog at ReformHam.com

Below is a clip from a Yemeni-American News article written by Simon Albaugh on October 13, 2020 related to the ballot question. In it, he quotes Scott Klein as indicating that he is affiliated with this Website and that he will not disclose who else is involved with it. While he does not have to disclose membership to the media, he is required to report any in-kind or monetary donors, including himself. This was not done.

COMMUNITY
NEWS

Public Safety Vote Divides Hamtramck

2020-10-13

10/13/20



Print post



PUBLIC SAFETY VOTE DIVIDES HAMTRAMCK



No Plan is the Plan

Scott Klein is a resident of Novi, Michigan. As a former Hamtramck City Councilmember, he says that politics has always been a toxic thing in Hamtramck.

"I've been in a fight with [the fire department] before," he said. "I once had a firefighter chase me up to the third floor in a sprint, threatening me."

Klein is one of the major organizers for a campaign to help the ballot proposal pass, called MIMAPs. He says that there are people he's working for, but he refuses to say who they are. "I prefer not to reveal them," Klein says.

According to Klein, the Fire Department costs have become too high for the city. Add that to the already high cost of retirement packages -- a product of the now defunct law that allowed firefighters to include overtime in their retirement salary -- and the city is facing a burden.

30



29



1



Now to establish that this Mimaps group and Keep Hamtramck Safe are the same entity and are weighing in and spending money on a ballot question without disclosing it.



On September 27, I and maybe every other Facebook user in Hamtramck were bombarded with Facebook ads related to the ballot question. A screenshot of the ad taken from my phone on 9.27.2020 is on the left.



This advertisement clearly states a position Propositions 1 and 2. It clearly cost money and clearly required someone to design it. None of these expenditures have been disclosed. Once clicked upon, the advertisement takes you to the Mimaps.org site that Scott Klein and Mohammed Hassan have affiliated themselves with. The site continues to push for a position on the ballot question. Screenshots are available if the site is no longer active upon your visit.

Around the same time, most residents and some former residents received their first robotext. I did not receive one, but I also do not have a Michigan phone number, which appears to be the criteria. The message did not state that it came from any particular committee, group or person and the number was unknown to everyone receiving it, but clearly took the same stance on the proposition. There were no disclosures from Klein and Hassan related to obtaining cellular phone data for residents or for hiring a robotext service. Below is a post from a recipient I captured on my

phone on 9.27.2020. The comments for this indicate how widespread the texts went and are available upon request. This became a minor ordeal in the community virtual space. If this is not from Klein and Hassan then there is yet a second group spending a great deal of money to influence this ballot question and failing to disclose its spending.



Like

Comment



Jeff Fournier

Admin · 1d ·

Anybody know this number? 12485733387. They are messaging people to Vote yes on prop 1 and 2. Anybody want to call it? It's from South Lyon? Why are these out of towners so interested in tearing apart our fire department? If the police and fire are taken apart they then break their unions. That's what this is about.

Andrea Karps and 7 others

15 Comments

Like

Comment



Najib Alwan

Oct 21 at 1:07 PM ·

I just got this text message about the fire department. Did any one else get this message? Does anyone recognize the number?

1:05 ·

< (313) 450-9035



Add to contacts

Block number

Wednesday, October 21, 2020



Every time the Hamtramck fire truck rolls, it costs you just about \$6,700. We can do better. Vote yes on Proposal 1 and 2.

<https://mimaps.org/blog/>

1:03 PM

A second set of robocalls went out a month later, incurring further unreported expenses. This one had a tag connecting the Hassan and Klein's group to the message. As shown in the posted screenshot of the message on the right at top. These texts came from a variety of phone numbers. Resident Jeremy Duncan looked up the number and called it. He got a South Carolina candidate for House Rep and a listing connecting it to the FBI. So while I didn't see impersonating the FBI, as part of the of the campaign finance statute, it's definitely grotesque

15

26 Comments · 1 Share

Like

Comment

Share

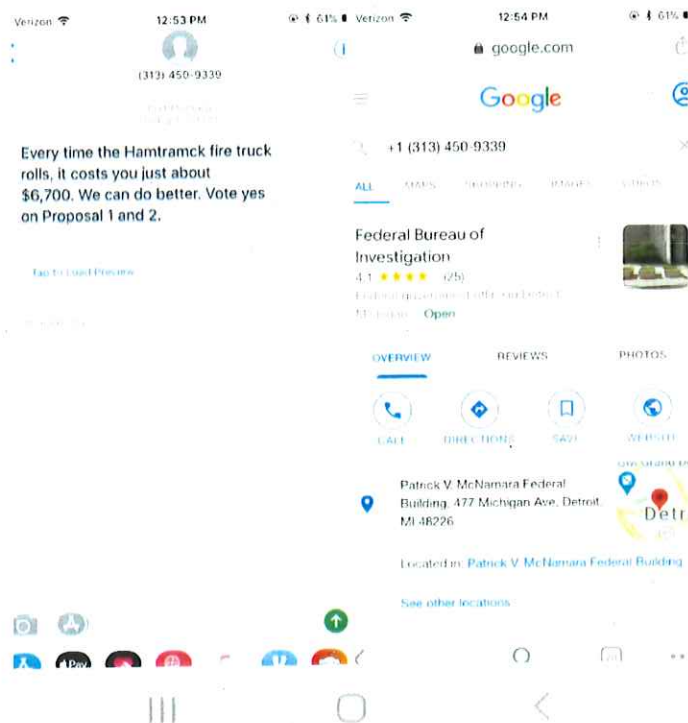




Jermery Duncan

2h • 🌐

This seems relevant. I got this spam text last Wednesday. If you call the number, it's a computer generated voice that says "Thank you for calling Rhodes Bailey for South Carolina house. The person who texted you has been notified of your call. You may also leave them a voicemail after the beep". I copied and pasted the number into Google with inte... [See More](#)



There is no place on the Web site or the in the robotexts to solicit donations, so I am either to believe that Hassan and Klein are paying for this from their own personal finances. To be honest this all seems like a lot of money for a truck driver and factory worker with a large family to spend. The Wayne County Clerk has no record of this group forming a campaign statement, reporting expenditures or donations.

Residents in this city have no idea who is spending money on robotexts, since these filings have not been made.

Finally, I think it is important to note that Mr. Hassan is a current salary-receiving member of the Hamtramck city council, and has indicated that his household paid for the Web site, and thus he may be using his taxpayer salary for these items then not reporting them properly. Mr. Hassan has held office in this community for at least 11 years, and Mr. Klein is a former public servant. Mr. Hassan just concluded an unsuccessful run for County Commissioner. These are not people who have plausible deniability of ignorance of the law.

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

Carie Beth Leshy
Signature of Complainant

Date

10/30/2020

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

Section 15(6) of the MCFA (MCL 169.215) required 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

Carie Beth Leshy
Signature of Complainant

Date

10/30/2020

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 and evidence to the following address:

Michigan Department of State
Legal and Regulatory Service Administration
Richard H. Austin Building - 4th Floor
430 West Allegan Street
Lansing, Michigan 48918



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

April 16, 2021

Mohammed Hassan
2425 Neibel
Hamtramck, MI 48212

Scott Klein
30016 Adorne Drive
Novi, MI 48377

Re: *Lasley v. Hassan, et al*
Campaign Finance Complaint
No. 2020-12-203-24

Dear Mr. Hassan & Mr. Klein:

The Department of State (Department) received a formal complaint filed by Carrie Lasley against you, alleging that you violated the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.201 *et seq.* Copies of the complaint and supporting documentation are 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 form a committee within 10 days is subject to a civil fine up to \$1,000. MCL 169.221(13). 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.

Additionally, the MCFA requires 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. Lasley alleges that you formed a committee and failed to file a statement of organization and subsequent reports with the Wayne County Clerk's Office.

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 to my attention.

A copy of your answer will be provided to Ms. Lasley, 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 penalties provided in sections 24, 25, and 34 of the Act.

If you have any questions concerning this matter, you may contact me at 517-335-3234 or Elections@Michigan.gov

Sincerely,

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

Adam Fracassi
Bureau of Elections
Michigan Department of State

c: Carrie Lasley



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

7018 1830 0001 8120 5773

March 1, 2022

7018 1830 0001 8120 5780

SECOND NOTICE

Mohammed Hassan
2425 Neibel
Hamtramck, MI 48212

Scott Klein
30016 Adorne Drive
Novi, MI 48377

Via Certified mail

Re: *Lasley v. Hassan et al.*
Campaign Finance Complaint No. 2020-12-203-24

Dear Mr. Hassan and Mr. Klein:

By correspondence dated April 16, 2021, the Department of State (Department) advised you of its intention to investigate a complaint filed against you by Carrie Lasley 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 **March 22, 2022**. 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. Lasley.

Sincerely,

Adam Fracassi
Bureau of Elections
Michigan Department of State

SENDER: COMPLETE THIS SECTION

- ☐ Complete items 1, 2, and 3.
- ☐ Print your name and address on the reverse so that we can return the card to you.
- ☐ Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:



9590 9402 1449 5329 9709 80

2. Article Number (Transfer from service label)

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
if YES, enter delivery address below: ☐ No

3. Service Type

- | | |
|--|---|
| <input type="checkbox"/> Adult Signature | <input type="checkbox"/> Priority Mail Express® |
| <input type="checkbox"/> Adult Signature Restricted Delivery | <input type="checkbox"/> Registered Mail™ |
| <input type="checkbox"/> Certified Mail® | <input type="checkbox"/> Registered Mail Restricted Delivery |
| <input type="checkbox"/> Certified Mail Restricted Delivery | <input type="checkbox"/> Return Receipt for Merchandise |
| <input type="checkbox"/> Collect on Delivery | <input type="checkbox"/> Signature Confirmation™ |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery | <input type="checkbox"/> Signature Confirmation Restricted Delivery |
| <input type="checkbox"/> Insured Mail | |
| <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500) | |

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:



9590 9402 1449 5329 9709 66

2. Article Number (Transfer from service label)

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature ☒ Agent
☒ Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
 If YES, enter delivery address below: ☐ No

3. Service Type

| | |
|--|---|
| <input type="checkbox"/> Adult Signature | <input type="checkbox"/> Priority Mail Express® |
| <input type="checkbox"/> Adult Signature Restricted Delivery | <input type="checkbox"/> Registered Mail™ |
| <input type="checkbox"/> Certified Mail® | <input type="checkbox"/> Registered Mail Restricted Delivery |
| <input type="checkbox"/> Certified Mail Restricted Delivery | <input type="checkbox"/> Return Receipt for Merchandise |
| <input type="checkbox"/> Collect on Delivery | <input type="checkbox"/> Signature Confirmation™ |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery | <input type="checkbox"/> Signature Confirmation Restricted Delivery |
| <input type="checkbox"/> Insured Mail | |
| <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500) | |

Domestic Return Receipt

SCOTT KLEIN

30016 Adorne Dr., Novi MI 48377
Kleinscott1960@gmail.com 313.352.7748

RECEIVED/FILED
MICHIGAN DEPT OF STATE
2022 MAR 18 PM 1:40
ELECTIONS/GREAT SEAL

Bureau of Elections
Michigan Department of State

Richard H. Austin Bldg.
430 W. Allegan St.
Lansing MI 48918

Re: *Lasley v. Hassan et al.*
Campaign Finance Complaint No. 2020-12-204-24

To Whom It May Concern,

I have received my copy of the complaint which is hard for me to see as anything other than continued harassment from Ms. Lasley.

Other than citing a redacted newspaper interview in which the quote attributed to me is not even a direct quote as dictated by the rules of standard English, there is no proof of any expenditure by me because, as noted by Ms. Lasley, I do not have the resources. The only evidence provided by Ms. Lasley is her conclusion, based on a flimsy construction of things that she says happened during the campaign which led her to assume I was involved. I was not.

To be clear, I have long been a critic of Hamtramck's public safety expenditures. My position and expertise on the matter are well known among journalists and leaders in the community, as well as informed residents. That's how I came to be interviewed by the Yemeni-American News. The reporter was referred to me as some one who could speak to the ballot procedure, ad hoc.

As someone who has been interviewed many times on a variety of subjects by reporters from foreign, national, state and local outlets, I realize that especially when print reporters come into play there are always questions and complaints about the conclusions reached by the narrative they spin. I am also aware that bravado and overstatement of facts are a political tool.

But in this case, the reporter's interpretation of my bravado became a fertile field where wild conspiracies grew.

Thank you for your careful consideration of this matter, and in general thanks for the important work you perform for the state.

Sincerely

From: Carrie Beth Lasley <cblasley@gmail.com>
Sent: Tuesday, August 9, 2022 9:31 AM
To: MDOS-BOERegulatory
Subject: Rebuttal to Klein response #202012-203-24

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

Rebuttal to Mr. Klein's response to my complaint:

Mr. Klein says the article identifying him with the false committee was redacted. He provides no proof of this, and it is factually inaccurate. The newspaper never redacted the article that I included in my complaint.

He then attacks a journalist. I must sarcastically applaud him for his unique approach to trying to get out of trouble. No one has ever tried blaming a journalist before. He does this while also indicating that he has great knowledge and expertise on the matter, and that is what led the journalist to speak to him, a non-resident. Mr. Klein forgets that he has not lived in the community or had any official role here in more than a decade. The 20-something reporter, not originally from this community, would not know who he was and had actually current people, including the city clerk, to speak to about ballot procedures. Klein lives in a world where a reporter is both all-knowing and stupid.

While Mr. Simon Albaugh, the journalist of discussion, has departed the profession for law school, I would be happy to reach out to him for an affidavit on this matter.

In addition to not providing any documentation for his claim of redaction, he fails to address any other aspect of the documented evidentiary complaint that I made. It also took him nearly a year and well past deadlines to mount any response, though neither factual, nor documented, to this unsubstantiated claim.

As to his claims of continued harassment, this harassment is in actuality his harassment of me. I am also happy to have my former supervisor sign an affidavit attesting to his regular attempts to get me fired from my job during my own political campaign by calling my supervisor with verifiably false claims that I was harassing him. Some of these calls were taken by Mrs. Melissa Palepu, a current state prosecutor, from whom I can also supply an affidavit from. My supervisor, Mr. Daniel Rosenbaum has already made such an offer. Klein additionally made calls to the Wayne County CEO's office with the same claims. I am happy to reach out to Mr. Assad Turfe to verify this. But as this is an election matter that seems unnecessary, but please let me know if this is desired. I am rather certain without factual evidence that he was the author of two strange letters that were sent to Hamtramck voters making wild claims about me. Much like his campaign against public safety, these were unattributed.

Given his history of claiming harassment from me, I am completely unsurprised that he opens with this claim of harassment again. His actions at my workplace were a significant factor in me feeling that I should leave my public-service job when a new supervisor was hired. I did not expect the new person to understand the odd viciousness of Hamtramck politics, especially from an Oakland County resident. I felt compelled to leave public service. I was essentially unemployed for a year following this, then took a private sector job that I keep secret from all but a few family and friends because I have no doubt Mr. Klein would continue his campaign to get me fired if he knew who to call. While he bloviates about harassment, I have actual real documentable actions and real financial losses I have taken to avoid his harassment. He is still meddling in Hamtramck politics nearly 20 years after leaving town, and I certainly would not expect him to forget me so quickly. His presence at a local forum on a local ballot issue alone is evidence of his need to try to interfere in another municipality's local matters.

Please let me know if you require further documentation, and best of luck in finding that non-existent redaction

Thank you for your guardianship of democracy,
Carrie Beth Lasley



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

September 12, 2022

Mohammed Hassan
2425 Neibel
Hamtramck, MI 48212

Scott Klein
30016 Adorne Drive
Novi, MI 48377

Re: *Lasley v. Hassan et al.*
Campaign Finance Complaint No. 2020-12-203-24

Dear Mr. Hassan and Mr. Klein:

The Department of State (Department) has finished investigating the campaign finance complaint filed against you by Carrie Lasley alleging that you violated the Michigan Campaign Finance Act (MCFA or Act). This letter concerns the disposition of that complaint.

The complaint alleged that, despite acting as part of the committee "Keep Hamtramck Safe," you failed to file a statement of organization with the proper filing official. Additionally, the complaint alleged that you failed to report expenditures for online advertisements, robotexts, and robocalls that took specific positions on ballot questions.

The Department twice invited you to respond to Ms. Lasley's complaint, once by regular mail and once by certified mail. The certified mail correspondence, dated March 1, 2022, informed you that a failure to respond within 15 business days of that notice would leave the Department with no alternative but to make its determination based solely on the documentation furnished by Ms. Lasley. To date, the Department has not received a response from Mr. Hassan to those letters or to any other communication from the Department.

A response to the complaint was received by Mr. Klein where he argues that he did not make any expenditures towards this group or the ballot questions and was not involved in the ballot question campaign.

Under the MCFA, a committee is 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." MCL 169.203(4).

An expenditure is “a payment . . . in assistance of, or in opposition to . . . the qualification, passage, or defeat of a ballot question.” MCL 169.206(1).

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 statements of organization that must be filed. *See* MCL 169.224(2)-(3). A person who fails to file a timely statement is subject to a civil fine of up to \$1,000. MCL 169.221(13). A person who fails to file a statement of organization shall pay a late filing fee of \$10.00 per business day the report is not 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 of up to \$1,000. *Id.*

Additionally, the MCFA requires committees file contributions and expenditures with the appropriate filing official by specific dates. MCL 169.233(1) – (3). The Act 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 16.233(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). Section 34 promulgates specific requirements and penalties for ballot question committees. *See* MCL 169.234.

First, the Department has determined that sufficient evidence has been presented to demonstrate that Mr. Hassan organized and operated the committee Keep Hamtramck Safe,¹ that Keep Hamtramck Safe made expenditures intended to influence the passage of ballot questions in Hamtramck, that those expenditures likely totaled more than \$500, and, consequently, that Keep Hamtramck safe was a ballot question committee regulated by the MCFA.² The Department finds that Mr. Hassan is likely affiliated with Keep Hamtramck Safe because the Keep Hamtramck Safe website, mimaps.org, was purchased by an individual who gave Mr. Hassan’s 2019 address as their own.

Second, the Department dismisses the allegations against Mr. Klein as there is insufficient evidence to conclude that a potential violation has occurred. While the evidence demonstrates that Mr. Klein is arguably a member of the group and has spoken to media about the group, there

¹ Although the committee may not have been formally named Keep Hamtramck Safe, the complaint alleges that you worked in concert on the website and associated advertisements that used that heading. Regardless of formal naming, a committee is formed when two or more people coordinate to make expenditures to influence an election, as previously described. As such, for the purposes of the complaint, we will refer to the committee as Keep Hamtramck Safe.

² These conclusions are drawn from the evidence presented by Ms. Lasley. Because Mr. Hassan did not respond to notices of the complaint filed against them, the Department must accept Ms. Lasley’s undisputed allegations as true in evaluating whether a potential violation has occurred.

is insufficient evidence demonstrating that Mr. Klein is in charge of the group and required to file reports. Even assuming Mr. Klein is a member, the only violation being alleged here is that a formal committee has not been formed and that reports have not been filed. It would not be a violation against Mr. Klein to be a member and speak to the public.

Facebook advertisements targeting Hamtramck residents were also purchased. These advertisements, which were titled “Keep Hamtramck Safe,” reiterated the position taken on mimaps.org. The advertisements linked to mimaps.org. Additionally, Hamtramck residents with a Michigan phone number received a robotext advocating for Propositions 1 and 2. While the text did not state it came from a particular committee, some of the texts included taglines connecting the texts to mimaps.org.

In light of the events explained above, the Department finds that sufficient evidence has been presented to support a finding of a potential violation of the MCFA. Mr. Hassan’s website, as well as the Facebook advertisements and text messages linked to the website, were intended to persuade Hamtramck residents to vote in favor of multiple ballot propositions. Additionally, the cost of the website, Facebook advertisements, and robotexts likely exceeded \$500. As a result, Keep Hamtramck Safe’s activities related to Propositions 1 and 2 made Keep Hamtramck Safe a ballot question committee regulated by the MCFA. MCL 169.202(3), 203(4). Although Keep Hamtramck Safe was a ballot question committee, the organization filed neither a Statement of Organization nor periodic campaign finance statements, as required by law³

After reaching these conclusions, the Act requires the Department to “endeavor to correct the violation or prevent further violation by using informal methods” if it finds that “there may be reason to believe that a violation . . . has occurred.” MCL 169.215(1). The objective of an informal resolution is “to correct the violation of prevent a further violation.” *Id.*

The Department will consider the matter resolved upon receipt of a proper filing of both a statement of organization and campaign finance report(s), if necessary, by Mr. Hassan.

This letter serves to notify you and your clients that the Department has determined there may be reason to believe that you have violated the Act and to notify you and your clients that the Department is beginning the informal resolution process. “If, after 90 business days, the secretary of state is unable to correct or prevent further violation by these informal methods, the secretary of state shall do either of the following:

- (a) Refer the matter to the attorney general for the enforcement of any criminal penalty provided by this act.
- (b) Commence a hearing as provided in subsection (11) for enforcement of any civil violation.”

³ A ballot question committee that receives less than \$1,000 in contributions and makes less than \$1,000 in expenditures during the election cycle may request a reporting waiver on its Statement of Organization relieving the committee of the duty to file campaign statements. Because you did not file a Statement of Organization, however, you could not have requested the reporting waiver.

MCL 169.215(11).

Please contact the undersigned at BOERegulatory@michigan.gov by October 25, 2022 to discuss a resolution to matter. If the Department is unable to reach a resolution, by January 30, 2022 the Department will have no choice but to refer the matter to the Department of Attorney General.

Sincerely,



Adam Fracassi, Regulatory Manager
Regulatory Section
Bureau of Elections
Michigan Department of State

c: Ms. Carrie Lasley

AFFIDAVIT OF MOHAMMED HASSAN

STATE OF MICHIGAN)

) ss.

COUNTY OF WAYNE)

I, Mohammed Hassan, being duly deposed and under oath, state as follows based upon my own personal knowledge and capacity to make this affidavit.

1. I am an adult resident of the State of Michigan. If called to do so I can testify to the facts set forth below from first-hand information.
2. I reside at 2425 Neibel.
3. I have no current or former relationship or involvement with the group calling itself "Keep Hamtramck Safe".
4. I do not know how Keep Hamtramck Safe funded itself or who the members of this organization are. I do, however, know that I did not contribute any cash or in-kind contribution to this organization.
5. I do not know how Keep Hamtramck Safe obtained its website or made any robocalls.

6. I do not now nor did I ever possess any of the information that would allow me to file a campaign finance report for Keep Hamtramck Safe.

FURTHER AFFIANT SAYETH NOT.

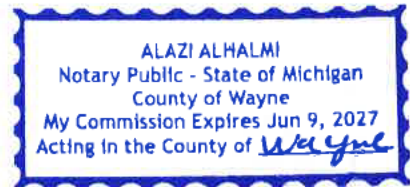
Mohammed Hassan
MOHAMMED HASSAN

Subscribed and sworn to me before this 2nd day of February, 2023

Alazi Alhalmi
Alazi Alhalmi, Notary Public

Wayne County, Michigan

My Commission Expires: 6-9-2027





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

February 9, 2023

Mohammed Hassan
2425 Neibel
Hamtramck, MI 48212

Re: *Lasley v. Hassan et al.*
Campaign Finance Complaint No. 2020-12-203-24

Dear Mr. Hassan:

The Department of State (Department) has finished investigating the campaign finance complaint filed against you by Carrie Lasley alleging that you violated the Michigan Campaign Finance Act (MCFA or Act). This letter concerns the disposition of that complaint.

As described in the Department's September 12, 2022 determination, given the evidence submitted by Ms. Lasley and in the absence of a response from you, the Department initially found that there was sufficient evidence to determine there may be reason to believe that you violated the MCFA. Your address was provided as the address of Keep Hamtramck Safe, a ballot question committee that subsequently failed to file required campaign finance reports.

Following the issuance of the determination, you contacted the Department, stated that you had no connection with Keep Hamtramck Safe and, pursuant to the Department's request, submitted an affidavit stating the same.

Accordingly, the Department dismisses the allegations against you as it did for the other party against whom the complaint was filed. While the evidence demonstrates that the address given for the website associated with Keep Hamtramck Safe is yours, there is insufficient evidence demonstrating that you are in charge of the group and required to file reports on its behalf.

You stated in your affidavit that you have no current or former relationship or involvement with the group "Keep Hamtramck Safe," that you do not know how the group was funded, and that you therefore do not possess the requisite information that would allow you to file a campaign finance report for the group.

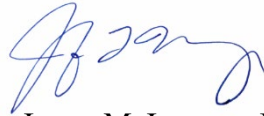
Because the violation of the MCFA alleged in the complaint has not been substantiated by

Mohammed Hassan

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sufficient evidence, the Department dismisses the complaint and will take no further enforcement action. If you have any questions concerning this matter, you may contact me at BOERegulatory@Michigan.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jenny McInerney', is positioned above the typed name.

Jenny McInerney, Regulatory Attorney
Bureau of Elections
Michigan Department of State