

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

RECEIVED/FILED
MICHIGAN DEPT 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.).

Please print or type all information.

I allege that the MCFA was violated as follows:

Section 1. Complainant			
Your Name Mark Liss		Daytime Telephone Number (586) 275-7505	
Mailing Address 426 9th Street			
City Royal Oak	State MI	Zip 48067	

Section 2. Alleged Violator		
Name Get Kids Back to School PAC		
Mailing Address 43155 Main Street, Suite 2210E		
City Novi	State MI	Zip 48375

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

Section(s) of the MCFA violated:
MCL 169.247 and MERTS Manual Appendix J IDENTIFICATION REQUIREMENTS.

Explain how those sections were violated:

Get Kids Back in School PAC endorses candidates for school boards across the state.

Its web page does not have a disclaimer notifying the reader of who paid for web page

hosting the endorsements (although the site does have a copyright notice).

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

Please see attached 'screen clips' from the PAC's web site at,

getkidsbacktoschoolmi.org.

If your complaint meets the above requirements, the Department will notify the alleged violator that a complaint has been filed. The notification will include a copy of your complaint. The alleged violator will have an opportunity to file a response. You will have an opportunity to file a rebuttal to any response. You and the alleged violator will receive periodic reports about the actions taken by the Department concerning your complaint.

If the Department finds no reason to believe that your allegations are true, your 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.

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(14) 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.

If you have any questions about the complaint process, please write or call the Legal and Regulatory Services Administration.

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

Chuck Liss

Signature of Complainant

09/15/11

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 and evidence to the following address:

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

Get Kids Back to School PAC

An independent expenditure-only committee dedicated to supporting candidates for local school board races who support the full return of students to school without mandates or restrictions.

How You Can Help

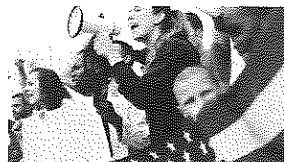
& Latest Articles



Mama Bear / Papa Bear Ice Cream Social

August 31, 2022

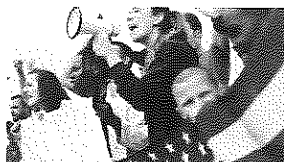
What: Mama Bear / Papa Bear Ice Cream Social When: Sunday, September 18 – 1pm to 4pm Where: Veterans Park, 14407 Stark Road, Livonia Featuring: School Board Candidates from Livonia, Plymouth and Northville Ice Cream and Bounce Houses for the Kids Cost: \$0 (registration required) Register at: <https://fb.me/6/2U4pyPzLZ> (If you are not on Facebook, please just...



NEW MICHIGAN EDUCATION PAC ENDORSES THIRD ROUND OF LOCAL SCHOOL BOARD CANDIDATES

August 22, 2022

August 22, 2022 (Northville, MI) – Get Kids Back to School PAC has made its third round of endorsements for local school board elections, throughout the state of Michigan. Lockdowns, mask mandates, forced or coerced vaccines and online learning imposed by school boards and administrations have forced tens of thousands of parents nationwide to enter...



NEW MICHIGAN EDUCATION PAC ENDORSES SECOND ROUND OF LOCAL SCHOOL BOARD CANDIDATES

July 6, 2022

June 28, 2022 (Northville, MI) – Get Kids Back to School PAC has made their second round of endorsements for local school board elections, throughout the state of Michigan. Lockdowns, mask mandates, forced or coerced vaccines and online learning imposed by school boards and administrations have forced tens of thousands of parents nationwide to enter...

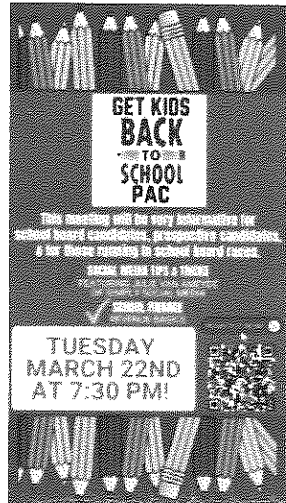


NEW MICHIGAN EDUCATION PAC ENDORSES FIRST ROUND OF LOCAL SCHOOL BOARD CANDIDATES

May 9, 2022

FOR IMMEDIATE RELEASE May 6, 2022 CONTACT Matthew J. Wilk, Director(734) 751-0328 getkidsbacktoschoolmi@gmail.com May 6, 2022 (Northville, MI) – Get Kids Back to School PAC has made their first round of

endorsements for local school board elections, throughout the state of Michigan. Lockdowns, mask mandates, forced or coerced vaccines and online learning imposed by school boards...



GKBTS PAC Informational Seminar

March 18, 2022



Welcome New Districts!

January 3, 2022

We'd like to welcome the following districts to the effort to Get Kids Back to School in 2022: Northville Novi Livonia Plymouth Canton Birmingham Bloomfield Grosse Pointe Walled Lake Huron Valley If you hear of parents in other districts who want to join in, email us at getkidsbacktoschoolmi@gmail.com



Notable Articles

December 1, 2021

Why do you need to come to Friday's meeting and stay engaged? Because people who make decisions for your children continue to deny that this is true.

Our Mission Statement

Get Kids Back to School PAC is an independent expenditure-only committee dedicated to supporting candidates for local school board races who support the full return of students to school without mandates or restrictions. Additionally, the PAC seeks candidates who will push back the tide of erosion on the traditional curriculum, where "wokeness" and the latest fads of seeking equality of outcomes, not equality of opportunity, have dictated the watering down and redirection of education for Michigan's students.

GKBTS will engage only in independent expenditures, which represent spending by individuals, groups, political committees, corporations or unions expressly advocating the election or defeat of clearly identified federal candidates. These expenditures will not be made in concert or cooperation with, or at the request or suggestion of a candidate, the candidate's campaign or a political party.

[Donate Today!](#)

Get In Touch!

734-751-0328

[Donate Today](#)

43155 Main Street, Suite 2210E
Novi, MI 48375
getkidsbacktoschoolmi@gmail.com

News

NEW MICHIGAN EDUCATION PAC ENDORSES THIRD ROUND OF LOCAL SCHOOL BOARD CANDIDATES

August 22, 2022

August 22, 2022 (Northville, MI) – Get Kids Back to School PAC has made its third round of endorsements for local school board elections, throughout the state of Michigan.

Lockdowns, mask mandates, forced or coerced vaccines and online learning imposed by school boards and administrations have forced tens of thousands of parents nationwide to enter the political arena, and Michigan is leading the charge. These parents have decided to get organized and push to replace incumbent school board members who called for these disastrous policies.

Matthew J. Wilk, director of Get Kids Back to School PAC noted, *"This group of educational champions has been on the front lines fighting for parental involvement in schools. They will be tireless advocates for transparency, a return to basics, and ultimately, an improvement in their local schools. As we get closer and closer to the November election, parents and voters need to know who to support. This group has our full and complete endorsement."*

The third round of endorsements includes:

Carrie Cerpone	Armada	https://getkidsbacktoschoolmi.org/candidate/carriecerpone/
Colleen Zammit	Birmingham	https://colleenzammit4tps.com/
Bob Wondergem	Grandville	https://getkidsbacktoschoolmi.org/candidate/bobwondergem/
Lianna Styx	Huron Schools	https://getkidsbacktoschoolmi.org/candidate/liannastyx/
Michelle Ryan	Huron Valley	https://getkidsbacktoschoolmi.org/candidate/michelleryan/
Latasha Keller	Novi	https://getkidsbacktoschoolmi.org/candidate/lataskeller/
Tony Barnhill	Owosso	https://www.facebook.com/committeetoelection/
Vanessa Senk	Owosso	https://getkidsbacktoschoolmi.org/candidate/vanessenk/
Nathan Morris	Plymouth Canton	https://getkidsbacktoschoolmi.org/candidate/natmmorris/
Julie Fernandez	Walled Lake	https://www.facebook.com/Julie4WalledLakeSch/
Shayna Levin	Walled Lake	www.ShaynaforWLCSD.com
Christy Tice	Walled Lake	https://getkidsbacktoschoolmi.org/candidate/christytice/
Brian Dunne	West Bloomfield	https://briandunneforwbsd.com/

More endorsements will be made at a later date.

Get Kids Back to School PAC, formed in 2021, is an independent expenditure-only committee dedicated to supporting candidates for local school board races who support the full return of students to school without mandates or restrictions.

Posted in Project Updates

NEW MICHIGAN EDUCATION PAC ENDORSES SECOND ROUND OF LOCAL

Search

Search

Recent Posts

Mama Bear / Papa Bear Ice Cream Social

NEW MICHIGAN EDUCATION PAC
ENDORSES THIRD ROUND OF
LOCAL SCHOOL BOARD
CANDIDATES

NEW MICHIGAN EDUCATION PAC
ENDORSES SECOND ROUND OF
LOCAL SCHOOL BOARD
CANDIDATES

NEW MICHIGAN EDUCATION PAC
ENDORSES FIRST ROUND OF LOCAL
SCHOOL BOARD CANDIDATES

GRBTS PAC Informational Seminar

Helpful Links

STATEMENT OF ORGANIZATION
FORM FOR LOCAL CANDIDATE
COMMITTEES FILED
WITH A COUNTY CLERK (PDF)

Affidavit of Identity and Receipt of
Filing (PDF)

Districts

Alcona (0)
Alcona (0)
Armada (1)
Auburn (0)
Berkley (0)
Birmingham (1)
Bloomfield Hills (5)
Broward (0)
Brighton (1)
Chapman Valley (3)
Clarkston (1)
Dundee (3)
East China (0)
Farmington (1)
Forest Hills (1)
Grand Blanc (0)
Grand Rapids (3)
Grandville (1)
Grosse Pointe (0)
Hercules (2)
Holly (0)
Huron Schools (1)
Huron Valley (2)
Kalamazoo (0)

SCHOOL BOARD CANDIDATES

Mama Bear / Papa Bear Ice Cream Social

Laurel House (1)
Lake Orion (6)
Livonia (31)
Macquoket (9)
Marshall (9)
Midland (0)
Miller (0)
Nagawasee (0)
Northville (3)
Novi (2)
Oakeside (3)
Oxford (0)
Plymouth (1)
Plymouth (1)
Plymouth-Canton (2)
Port Huron (0)
Portage (3)
Rochester (1)
Romney (1)
South Lyon (0)
Thornapple-Kellogg (0)
Troy (2)
Utica (0)
Van Buren (0)
Warren Lake (2)
Warren Consolidated (0)
Waterford (0)
Wayne-Westland (0)
Webberville (0)
West Bloomfield (1)
Whitefish (0)

Get in Touch!

📞 734-751-0326

📍 43155 Main Street, Suite 2210E
Novi, MI 48375

✉️ getkidsbacktoschoolmi@gmail.com

Donate Today



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

September 20, 2022

Get Kids Back to School PAC
43155 Main Street Ste 2210E
Novi, MI 48375

Re: *Liss v. Get Kids Back to School PAC*
Campaign Finance Complaint No. 2022 - 9 - 115 - 47

Dear Get Kids Back to School PAC:

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 the Get Kids Back to School PAC website. Pictures of the website are 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 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: Mark Liss

From: MDOS-BOERegulatory
Sent: Wednesday, October 5, 2022 9:47 AM
To: David W Staudt
Subject: RE: Campaign Finance Complaint No. 2022 - 9 - 115 - 47

Dear Mr. Staudt

The Department is receipt of your email regarding the Section 47 warning you received due to the omission of your committee name and address on your website. Thank you for the description of your efforts to correct the omission and for including an image of the corrected website. The Department is satisfied that these acts constitute reasonable efforts and consider the matter closed.

Regulatory Section
Bureau of Elections
Michigan Department of State

From: David W Staudt <compliance@impactmediapro.com>
Sent: Tuesday, October 4, 2022 5:44 PM
To: MDOS-BOERegulatory <MDOS-BOERegulatory@michigan.gov>
Subject: Campaign Finance Complaint No. 2022 - 9 - 115 - 47

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

Hello,

My name is Dave Staudt and I am Treasurer of Get Kids Back to School PAC (ID No. 520190)

I am in receipt of the above referenced Campaign Finance Complaint.

We have reviewed the information in the complaint and immediately made corrections to remedy the violation on our PAC website. A copy of the "Paid for" statement is attached. This was an unintentional oversight by the website developer.

We will use greater care in the future to make sure that we are in compliance with the MCLA.

Dave Staudt
Treasurer
Get Kids Back to School PAC

Dave Staudt
Accounting and Compliance Consultant
Impact Media Professionals, LLC.
43155 Main Street, Ste. 2210E
Novi, MI 48376
Cell: 248.561.5055
Fax: 248.341.0555

campaign or a political party.

[Donate Today!](#)

Get In Touch!

 734-751-0328

 43155 Main Street, Suite 2210E
Novi, MI 48375

 getkidsbacktoschoolmi@gmail.com

Paid for by **Get Kids Back to School PAC**
43155 Main Street, Suite 2210E
Novi, MI 48375

[Donate Today](#)