



**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 OCT 30 PM 2:14

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 <u>Janice Priess</u>		Daytime Telephone Number <u>810-387-4356</u>	
Mailing Address <u>8181 Jordan</u>			
City <u>Melvin</u>	State <u>MI</u>	Zip <u>48454</u>	
Email (optional)			

Section 2. Alleged Violator		
Name <u>Jean Fuller</u>		
Mailing Address <u>7560 Jordan</u>		
City <u>Melvin</u>	State <u>MI</u>	Zip <u>48454</u>
Email (optional)		

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

Section(s) of the MCFA alleged to be violated: PA 269

Explain how those sections were violated:

Jean used her salaried position as treasurer now  
when she included the enclosed letter in the envelope  
in which our tax receipts were sent to  
the property owners who had paid their taxes  
within the last tax season (summer).

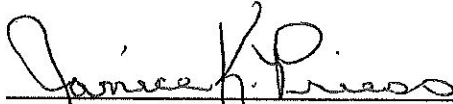
Evidence included with the submission of the complaint that supports the allegations:

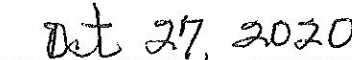
The letter and envelope was with my tax  
(in which they were mailed)  
receipt for the payment of summer taxes 6 weeks  
previously but arrived 2 weeks before the election.

**Section 4. Certification (Required)**

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

X

  
Signature of Complainant

  
Date

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

If, after a reasonable inquiry under the circumstances, you are unable to certify that certain factual contentions are supported by evidence as indicated above, you may make the following certification:

*I certify that to the best of my knowledge, information, or belief, there are grounds to conclude that the following specifically identified factual contentions are likely to be supported by evidence after a reasonable opportunity for further inquiry. Those specific contentions are:*

---

---

---

---

---

---

X

\_\_\_\_\_  
Signature of Complainant

\_\_\_\_\_  
Date

Section 15(8) of the MCFA provides that a person who files a complaint with a false certification is responsible for a civil violation of the MCFA. The person may be required to pay a civil fine of up to \$1,000.00 and some, or all, of the expenses incurred by the Michigan Department of State and the alleged violator as a direct result of the filing of the complaint.

**Section 6. Submission**

Once completed, mail or hand deliver the complaint form with your evidence to the address below. The complaint is considered filed upon receipt by the Bureau of Elections.

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

Dear Speaker township Neighbors,

As you might have noticed, my name (Jean Fuller) was not on the August ballot. There was some miscommunication and I did not get the paperwork in on time. I am told that because my name was not on the August ballot I cannot be on the November ballot as a Republican. I have to list myself as Non-Partisan. I will be on the November ballot under Non-Partisan but I am a Republican.

---

When I started as the Township Treasurer it was all new to me and along the way I feel like I have learned a lot. With the training and experience I continue learning every day. I am asking that you let me continue learning and improving to be the best Treasurer I can be instead of starting over with a new Treasurer. I care about each and every one of you and will always do my best to help in any way possible.

Vote Jean Fuller, For Treasurer. I am Republican, but you will find my name under Non-Partisan.

---

\*This is my township too, we are in this together.



Thank you,

Jean Fuller



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

January 25, 2021

Jean Fuller  
7560 Jordan  
Melvin, MI 48454

Re: *Priess v. Fuller*  
Campaign Finance Complaint  
No. 2020-10-194-57

Dear Jean Fuller:

The Department of State (Department) received a formal complaint filed by Janice Priess 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.

In Michigan it is unlawful for a public body or an individual acting on its behalf to use or authorize the use of equipment, supplies, personnel, funds, or other public resources to make a contribution or expenditure. MCL 169.257(1). The words "contribution" and "expenditure" are terms of art that are generally defined to include a payment or transfer of anything of ascertainable monetary value made for the purpose of influencing or made in assistance of the qualification, passage, or defeat of a ballot question. MCL 169.204(1), 169.206(1). A knowing violation of this provision is a misdemeanor offense. MCL 169.257(4).

Ms. Priess alleges that you improperly utilized township resources to expressly advocate for your election by including with the tax receipt mailed to township residents a letter which urged residents to vote for you. A copy of the letter was included with the complaint.

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.* For more information on the investigative process and potential resolutions, please review the Department's guidebook, a copy of which is enclosed and 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. Please submit any materials via email to [Elections@Michigan.gov](mailto:Elections@Michigan.gov). A copy may also be sent to the Department of State, Bureau of

Elections, Richard H. Austin Building, 1<sup>st</sup> Floor, 430 West Allegan Street, Lansing, Michigan 48918. 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. Priess, 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 57(4) of the Act.

If you have any questions concerning this matter, you may contact me at (517) 335-3234.

Sincerely,

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

Adam Fracassi  
Bureau of Elections  
Michigan Department of State

c: Janice Priess



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

March 1, 2022

**SECOND NOTICE**

Jean Fuller  
7560 Jordan  
Melvin, MI 48454

*Via Certified mail*

Re: *Priess v. Fuller*  
Campaign Finance Complaint No. 2020-10-194-57

Dear Ms. Fuller:

By correspondence dated January 25, 2021, the Department of State (Department) advised you of its intention to investigate a complaint filed against you by Janice Priess 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. Priess.

Sincerely,

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

Adam Fracassi  
Bureau of Elections  
Michigan Department of State

2022 MAR 18 AM 10:12

ELECTIONS/GREAT SEAL

Board of Elections,

I am responding to the second notice sent. I emailed my letter the first time. I was unaware that the email was not received. I apologize.

I will start from the beginning. I am a teacher and have never been involved or interested in politics.

I was asked to run for treasurer the first time around and lost by 12 votes. It was no big deal. The elected treasurer contacted me a year later and wanted me to take over for her a year later because she was wanting to leave her position. I agreed and had very little training. I did my best and definitely made mistakes along the way but was learning. Time came for the election and I was unaware of the need for me to get signatures and fill out paperwork. I thought that was only for new candidates. My mistake. Because I did not do this I couldn't be on the ballot as Republican.

This county is majority Republican. I knew I would not have a chance. I had the bright idea to put the letter in with the tax receipts that I would be sending. I had no idea this would not be allowed. I bought the envelopes and stamps with my own money. I printed the letters at home and stuffed envelopes on



my own time. After sending these letters out I received a call from Jason Nielson asking if I did this and ~~the~~ telling me I should not have. I apologized and I thought that was the end of it. I received another call telling me they would be holding an emergency meeting because of this. They talked to their lawyer and this was suggested as next step. I also contacted a lawyer and went to the meeting. There were a few that showed up just to yell at me. I apologized and because I had not used money from the township that was the end of it. The lady that is filing this Complaint was one of Non Partisan Candidates running for treasurer.

The Republican party Candidate won the election. Having use my own time & money along with the fact that I did not win the election made me think this was over. I did not intend to hurt anyone. My actions did not cause Janice Priess to lose the election.

Again I truly apologize for my poor choice of sending this letter. I did apologize several times at that township meeting.

Jean Fuller





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

April 11, 2022

Janice Priess  
8181 Jordan  
Melvin, MI 48454

Re: *Priess v. Fuller*  
Campaign Finance Complaint No. 2020-10-194-57

Dear Ms. Priess:

The Department of State received a response from Jean Fuller to the complaint you filed against her alleging a violation of the Michigan Campaign Finance Act, 1976 P.A. 388, MCL 169.201 *et seq.* A copy of the response is provided as an enclosure with this letter.

You may file a rebuttal statement after reviewing the enclosed response. If you elect to file a rebuttal statement, you are required to do so within 10 business days of the date of this letter. The rebuttal statement may be emailed to [BOERegulatory@michigan.gov](mailto:BOERegulatory@michigan.gov) or mailed to the Department of State, Bureau of Elections, Richard H. Austin Building, 1<sup>st</sup> Floor, 430 West Allegan Street, Lansing, Michigan 48918.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jenny McInerney".

Jenny McInerney  
Election Law Specialist  
Michigan Bureau of Elections

REC'D  
MICHIGAN  
2022 APR 22 AM 10:30  
ELECTIC  
FILED  
STATE  
EAT SEAL

April 17 2022  
Received April 14,  
2022

Dear Ms. Jenny McInerney  
Board of Elections:

This letter is a rebuttal to Ms. Jean Fuller's response to the complaint of election violation in the election 2020.

Ms Fuller said that she had received a second notice and she responded.

Second, Ms Fuller did run previously ~~at~~ election before the one in question. There were 5 people running in the primary and Ms Fuller lost in the primary where she did run as a Republican. The leading ones then ran in November. Anna Turner, Jan and ~~an~~ won but after 5 months she made the decision to resign leaving the township without a needed treasurer. So the township needed to fill the position. There was no posting throughout the township. The board then decided to elect Ms Fuller in that position. People were surprised when they received their communications (tax bills, etc) to find Ms. Fuller's name when she

didn't make it through the primary. She finished at the term of Ms Turner with a series of problems.

So Ms Fullers statement "Time came for the election and I was unaware of the need to get signatures and fill out paperwork" is something that working in the office a few before the next election doesn't make sense. She had ran ~~the~~ in the previous primary.

Her next statement "Because I didn't do this, I couldn't be on the ballot as a Republican". But she declared on her letter put in the tax bills receipts that if she was going to be a Republican instead of a non-partisan so that would be two Republican vying for the same position. That is also a violation.

Her statement that she put her campaign letter, received Oct 14, 2020, with township tax receipts just before the election in envelopes she paid for and used her own time is not only a violation. Township mail and personal campaign letters can not be in the same mailing. Apologies are not acceptable in this case. Nor did I ~~agree~~ agree to that condition.

It is true the board did have a special meeting for this and a few other incidents. She ~~was~~ told to bring her attorney to the special meeting but it ended up being a man identified in township notes Eric Doister. He did not arrive in person but on a cell phone of her husband, Jeff Fuller. This did not give her the representation she was told to have as she was going to possibly be arrested. That night also there was a Sanilac Sheriff's dept. marked car parked on the parcel next to the township hall, facing the hall not the road as we left. So there was more than this as I was told that the police were going to be there by a board member.

The woman who ran as a Republican did win the treasurer position and she is doing well. Covid may have delayed some of the actions but I mailed ~~my~~ my complaint a week after that special meeting concerning Ms Fuller. But this needs to be addressed as she should have not been able to run at all in that election or any future elections.

I believe that her actions may have changed the results whether I should have lost or not. She pulled votes from both of us. Thank you for this opportunity.

Sincerely  
Jan Pires



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

September 12, 2022

Jean Fuller  
7560 Jordan  
Melvin, MI 48454

Re: *Priess v. Fuller*  
Campaign Finance Complaint No. 2020-10-194-57

Dear Ms. Fuller:

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

The complaint alleged that you improperly used township resources to expressly advocate for your election by including with the tax receipt mailed to township residents a letter which urged residents to vote for you. A copy of the letter was included with the complaint.

You responded to the complaint in a letter dated March 18, 2022. In your response, you acknowledged that you included in a township mailing the letter advocating for your election. You claimed that you did not realize that all candidates had to submit nominating petitions, and that your inexperience in politics caused you to miss the deadline to file as a candidate for a political party and to take unusual actions to express your political affiliation to voters. You stated that you purchased the envelopes and stamps for the mailing with your own funds, printed the letters at home, and stuffed envelopes on your own time.

Ms. Priess was given the opportunity to submit a rebuttal, which she did in a letter received by the Department on April 22, 2022. Ms. Priess stated that you could not claim that you did not know the rules of candidacy, given that you were a candidate in the 2016 primary election for treasurer of Speaker Township and served in that role for approximately three years before the events in question.

Both you and Ms. Priess addressed the question of whether your actions caused her to lose the election. However, whether they had that effect, or any effect on the election, is not under the purview of the MCFA and thus is immaterial to this matter.

In Michigan it is unlawful for a public body or an individual acting on its own behalf to use or authorize the use of equipment, supplies, personnel, funds, or other public resources to make a

contribution or expenditure. MCL 169.257(1). A public body is allowed to produce or disseminate factual information concerning issues relevant to the function of the public body. MCL 169.257(1)(b). The words “contribution” and “expenditure” are terms of art that are generally defined to include a payment or transfer of anything of ascertainable monetary value made for the purpose of influencing or made in assistance of the qualification, passage, or defeat of a ballot questions. MCL 169.204(1), 169.206(1). A knowing violation of this provision is a misdemeanor offense. MCL 169.257(4).

The Department has reviewed the evidence submitted in this matter and finds that sufficient evidence has been presented to support a finding of a potential violation of the MCFA. The letter at issue specifically states, “Vote Jean Fuller, [sic] For Treasurer.”

This language is the exact type of language section 57 of the Act prohibits. A public body or person acting on its behalf may not expend public funds or use public resources to expressly advocate for the passage of a ballot question. Under the MCFA, express advocacy is defined as language that specifically urges voters to “vote yes,” “vote no,” “elect,” “defeat,” “support,” or “oppose” a ballot question or candidate, using these or equivalent words and phrases. MCL 169.206(2)(j). The letter you sent meets this standard as it urged voters to vote for you. This language not factual in nature, but is express advocacy as defined by the MCFA.

You stated that you purchased the envelopes and stamps with your own money and that you stuffed the envelopes on your own time. Ms. Priess did not dispute that statement. However, the letter would not have gone out if not for your duty to send out the tax receipt as part of your paid position as township treasurer. These two are thus inextricably linked; it is impossible to separate the time and public resources you permissibly spent in your duties as township treasurer from the time and public resources you impermissibly spent as a candidate. Moreover, the inclusion of the letter with residents’ tax receipts gave it increased visibility and conveyed unearned emphasis onto the letter; a resident who would otherwise dispose of campaign literature would look more closely at a letter enclosed in a tax receipt. Both of these factors support a conclusion that you should reimburse the township for any and all public resources expended by you or others in sending the tax receipt.

When the Department finds that there may be reason to believe a violation has occurred, the Act requires the Department to use “informal methods such as a conference [or] conciliation” to correct the potential violation or to prevent further violation. MCL 169.215(10). Statute provides 90 business days for the Department to engage this resolution process. *Id.* If this matter is not resolved within 90 business days, or by January 30, 2023, the Department will have no choice but to proceed with either referral to the Attorney General’s office for enforcement of any criminal penalties or commence an administrative hearing against you. *Id.*

For these reasons, please contact the undersigned at [BOERegulatory@michigan.gov](mailto:BOERegulatory@michigan.gov) as soon as possible to discuss a resolution to matter. If you fail to make contact to discuss a possible resolution, or if a resolution cannot be reached by January 30, 2023, the Department will have no choice but to seek the aforementioned remedies.



Jean Fuller  
Page 3

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jenny McInerney', with a stylized flourish at the end.

Jenny McInerney, Election Law Specialist  
Bureau of Elections  
Michigan Department of State

c: Janice Priess

## MDOS-BOERegulatory

---

**From:** MDOS-BOERegulatory  
**Sent:** Friday, January 13, 2023 2:26 PM  
**To:** Jean Fuller  
**Subject:** RE: Re:

Dear Ms. Fuller,

Have you reimbursed the township for the cost of your deputy's work on behalf of your campaign? If so, please provide documentation and any correspondence with the township regarding that reimbursement. If not, please consider this a reminder that the conciliation period expires January 30, at which time the Department will refer the complaint to the Attorney General's office if it has not been resolved.

Thank you,

**Jenny McInerney**  
*Regulatory Attorney*  
Regulatory Section  
[Michigan Bureau of Elections](#)  
Main: 517-335-3234

---

**From:** Jean Fuller <[jean69fuller@gmail.com](mailto:jean69fuller@gmail.com)>  
**Sent:** Friday, December 2, 2022 6:22 AM  
**To:** MDOS-BOERegulatory <[MDOS-BOERegulatory@michigan.gov](mailto:MDOS-BOERegulatory@michigan.gov)>  
**Subject:** Re: Re:

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

Ok, thanks.

On Mon, Oct 10, 2022, 2:54 PM MDOS-BOERegulatory <[MDOS-BOERegulatory@michigan.gov](mailto:MDOS-BOERegulatory@michigan.gov)> wrote:

Yes, that's correct.

---

**From:** Jean Fuller <[jean69fuller@gmail.com](mailto:jean69fuller@gmail.com)>  
**Sent:** Tuesday, October 4, 2022 7:56 PM  
**To:** MDOS-BOERegulatory <[MDOS-BOERegulatory@michigan.gov](mailto:MDOS-BOERegulatory@michigan.gov)>  
**Subject:** Re:

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

Thank you for your response. If I read this correctly then I owe for the time it took to stuff the envelopes to mail them? My deputy did charge the township for her time in stuffing the tax receipts so the two were lumped in together. In my mind I was thinking that would be ok because I bought the envelopes that both the taxes and flyer were in and paid to send them. I really seen that as saving the township money. I see now that that was wrong. So I need to pay the township back for two or three hours of what my deputy was paid to stuff these? I did nothing at the hall. When I was at the hall I only did hall business. After collecting taxes and printing receipts I then gave receipts to my deputy to mail out. Am I correct in my thinking?

On Thu, Sep 29, 2022, 10:26 AM MDOS-BOERegulatory <[MDOS-BOERegulatory@michigan.gov](mailto:MDOS-BOERegulatory@michigan.gov)> wrote:

Dear Ms. Fuller,

Thank you for responding to us. The Department stated in its determination letter dated September 12, 2022, that all factors led to a conclusion that you used public resources to expressly advocate for your election. You have stated that these actions were accidental and expressed a willingness to resolve the matter.

Please provide a list of public resources used and the costs associated with those resources. The amount in question need not be a large amount, and it likely will not be, but it should reflect a good faith estimate of the resources used. You have indicated that you paid for the envelopes and stamps yourself, and that you printed the mailer at home. The list of resources should include the cost of any paper or printing materials paid for by the township, any time in which you were paid by the township but working on the mailer (and the cost of that working time), and any other resources that furthered the creation, compilation, and sending out of the mailer.

If you have any questions, please feel free to contact me.

Jenny McInerney, Regulatory Attorney

Bureau of Elections

Michigan Department of State

---

From: Jean Fuller <[jean69fuller@gmail.com](mailto:jean69fuller@gmail.com)>  
Sent: Friday, September 16, 2022 5:27 PM  
To: MDOS-BOERegulatory <[MDOS-BOERegulatory@michigan.gov](mailto:MDOS-BOERegulatory@michigan.gov)>  
Subject:

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

This is Jean Fuller. I am contacting you to see what to do next. I now know what I did was wrong, but it didn't hurt anyone but me. Not sure what else I have to do?



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

February 6, 2023

The Honorable Dana Nessel  
Department of Attorney General  
G. Mennen Williams Building  
525 West Ottawa Street  
Lansing, MI 48933

Re: *Priess v Fuller*  
Michigan Campaign Finance Complaint

Dear Attorney General Nessel:

Please allow this letter to serve as a referral to the Attorney General of the above referenced campaign finance matter for the enforcement of any criminal penalties under the Michigan Campaign Finance Act. MCL 169.215(10)(a).

If you or your staff would like any additional information regarding this case, please contact this office.

Sincerely

s/ Michael J. Brady

Michael J. Brady, Chief Legal Director  
Michigan Secretary of State

cc: Heather Meingast, Division Chief, CLEE Division