



Michigan Department of State Campaign Finance Complaint Form

BUREAU OF ELECTIONS • RICHARD H. AUSTIN BUILDING – 1st Floor
430 W. ALLEGAN STREET • LANSING, MICHIGAN 48918

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

Matthew J. Wilk

Daytime Telephone Number

734-751-0328

Mailing Address

17245 Cameron Dr.

City

Northville

State

MI

Zip

48168

Email (optional)

Matthew.wilk@sbcglobal.net

Section 2. Alleged Violator

Name

Committee to Elect Kimberly Campbell-Voytal to Northville School Board

Mailing Address

113 West Street

City

Northville

State

MI

Zip

48167

Email (optional)

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

Section(s) of the MCFA alleged to be violated: Sec 47 (MCL 169.247)

Explain how those sections were violated:

- 1) Campaign website without require disclosures or address.
- 2) Creation and paid boosting of a Facebook and Twitter page without disclosures.
- 3) Potential unlawful coordination amongst candidates (slate page without any disclosures, coordination of creation of slate materials without disclosures)

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

- 1) Printout of campaign website. 2) Screenshot of Facebook page as of 9/19. 3) Screenshot of Twitter page as of 9/19. 4) Screenshot of admission of purchase of paid ads.

RECEIVED/FILED
MICHIGAN DEPT OF STATE
2022 SEP 29 PM 3:31
ELECTIONS/GREAT SEAL

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

9/27/22

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

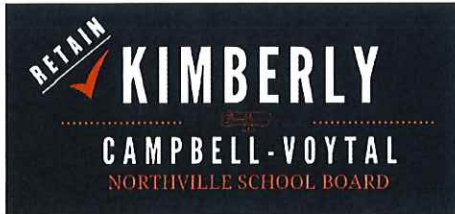
Date

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



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Strong public schools are the cornerstone of Northville, our democracy, and a key to our collective future. I am committed to fighting for students and standing with teachers so that

together we ensure that our children grow, thrive,
and are ready to participate in a global society.

My commitment to Northville.



As a public health educator, nurse, and Northville resident for over 30 years I understand the importance of quality education and strong community schools.

[LEARN MORE ABOUT ME NOW!](#)

See Endorsements





Meet Kim

Keep in touch!

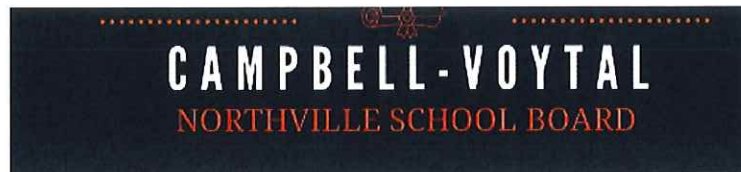
Name *

First Name

Last Name

Phone





kcvforboe@gmail.com

©2022 by Kimberly Campbell-Voytal

Paid for and managed by the Committee to Elect Kimberly Campbell-Voytal

6:31
VOTE ON
OR BEFORE
NOVEMBER 8

NORTHVILLE SCHOOL BOARD

We look forward to serving the Northville Public Schools community with a commitment to excellence, parent involvement, and fiscal responsibility.

TOGETHER, LET'S MAKE IT A GREAT SCHOOL YEAR, FILLED WITH A WORLD OF POSSIBILITIES!

<p>Retain</p>   <p>KIM CAMPBELL-VOYTAL</p>	<p>Elect</p>   <p>CARIN MEYER</p>	<p>Elect</p>   <p>MELISSA STUART</p>
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3 SCHOOL BOARD SEATS TO FILL. THE CHOICE IS CLEAR.

COMMITMENT TO EXCELLENCE
PARENT ENGAGEMENT
SAFE & HEALTHY SCHOOLS
FISCAL RESPONSIBILITY

VOTE FOR
CAMPBELL-VOYTAL
MEYER
STUART



Friends of Northville Public Schools

Education website



Like

 Follow



Beth and 115 others like this

Home

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Community



<https://instagram.com/friendsfnps>



<https://twitter.com/friendsfnps>



Friends of Northville Public Schools is a place for the greater Northville community to learn about important topics that impact the success of NPS students, including the board of education. Visit this page frequently for updates!



[Education website](#)



[Send message](#)



6:31

92%

CANDIDATES FOR NORTHVILLE SCHOOL BOARD: THE CHOICE IS CLEAR



Coming
Together



For
Northville



Kim Campbell-Voytal
KimVoytal.com

Carin Meyer
MeyerForNorthvilleSchoolBoard.com

Melissa Stuart
StuartForNorthville.com



Follow

FriendsOfNorthvillePublicSchools

@FriendsOfNPS

Friends of Northville Public Schools is a place for the greater Northville community to learn about important topics that impact the success of NPS students, in

Joined September 2022

30 Following 10 Followers



Followed by Northville Schools and Mary Kay Gallagher

Tweets

Tweets & replies

Media

Likes

Who to follow



Hello everyone! My name is Velda and I'm a Northville parent and a new social media volunteer. A couple days ago, I set up a quick demo of how Facebook follower growth ads work and unfortunately, one of the drafts activated overnight, delivering \$3.28 worth of page promotion over a few hours.

As soon as I learned that the promotion was active, I quickly turned it and the page off while it was still being constructed.

I apologize if I upset anyone and for any harm done to the three people who appeared in the ad image.

Thank you!
Velda

1 comment

 Like

 Comment

 Share



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

October 10, 2022

Committee to Elect Kimberly Campbell-Voytal to Northville School Board
111 West St
Northville, MI 48167

Re: *Wilk v. Committee to Elect Kimberly Campbell-Voytal to Northville School Board*
Campaign Finance Complaint No. 2022 - 9 - 129 - 47

Dear Ms. Campbell-Voytal:

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 your campaign's website as well as Facebook and Twitter pages. Pictures are included with the complaint; a copy of the complaint is enclosed.

Concerning the Facebook and Twitter page:

Upon review, the evidence submitted regarding the Facebook and Twitter pages does not support the conclusion that a potential violation of the Act has occurred. The evidence submitted indicates that pages and posts were created by a third party group and there is nothing suggesting the Committee to Elect Carin Meyer is connected to or controlling this group. For this reason, this part of the complaint is dismissed.

Concerning the Committee to Elect Kimberly Campbell-Voytal to Northville School Board Website:

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: Matthew Wilk