



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](#) (MCFA). Electronic submission of the form to BOERegulatory@Michigan.gov is strongly recommended. 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		Daytime telephone number
Mark Brewer		248-483-5000
Mailing address		
17000 W. 10 Mile Road		
City	State	Zip
Southfield	MI	48075
Email (recommended)		
mbrewer@goodmanacker.com		

Section 2. Alleged Violator (Respondent)

Name		
Florida Igloo PAC		
Mailing address		
195 Harr Trail Road		
City	State	Zip
Blountville	TN	37617
Email (recommended)		
info@floridaigloo.org		
Committee ID (optional)		
521161		

Please include email addresses to expedite processing time and mitigate mail delays.

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

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

MCL 169.205(2); MCL 169.211(2); MCL 169.233(3); MCL 169.247(1); MCL 169.247(4)

Explain how these sections were violated:

This complaint alleges that the Florida Igloo PAC violated the MCFA in two ways. First, the Florida Igloo PAC placed a defective identification on a piece of literature advocating for the recall of State Representative Noah Arbit. Second, the Florida Igloo PAC filed an inaccurate campaign finance statement. For details, see the attached.

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

See Attached

Section 4. Certification *(required)*

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



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:

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 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, submit the complaint form with your evidence to BOERegulatory@Michigan.gov. Alternatively, you may 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

Section 3. Violations

This complaint alleges that the Florida Igloo PAC violated the Michigan Campaign Finance Act (“MCFA”) in two ways. First, the Florida Igloo PAC placed a defective identification on a piece of literature advocating for the recall of State Representative Noah Arbit. Second, the Florida Igloo PAC filed an inaccurate campaign finance statement.

Defective Identification

The MCFA requires that “a billboard, placard, poster, pamphlet, or other printed matter having reference to an election, a candidate, or a ballot question, shall bear upon it an identification that contains the name and address of the person paying for the matter.” MCL 169.247(1). Such printed matter is also required to include “paid for ‘with regulated funds’” on the identification. MCL 169.247(4).

Under the MCFA, an “[e]lection includes a recall vote.” MCL 169.205(2). Thus, a printed matter referencing a recall election or a candidate being recalled is required to include an identification.

The MCFA defines “person” to include a “committee, or any other organization or group of persons acting jointly.” MCL 169.211(2). Under this definition, the Florida Igloo PAC is a “committee,” and is thus required to place an identification upon a printed matter referencing a recall election or a candidate being recalled.

The Florida Igloo PAC produced a piece of literature supporting the recall of State Representative Noah Arbit. The piece of literature includes an identification that reads: “Paid for by Florida Igloo PAC.” However, the identification does not contain the phrase “paid for with regulated funds.” Therefore, the identification does not comply with the MCFA.

Failure to Report

The MCFA requires that a PAC “file with the secretary of state . . . campaign statements as required by this act.” MCL 169.233(3). Knowingly filing incomplete or inaccurate campaign finance statements carries a civil penalty. MCL 169.233(10)–(11).

On July 25, 2023, the Florida Igloo PAC filed a July Quarterly Campaign Statement. The campaign statement reports \$0.00 in contributions and \$0.00 in expenditures. This campaign statement covers April 20, 2023, to July 20, 2023. Based on information and belief, the piece of literature was produced during this time frame. The first recall petition against State Representative Arbit was filed on July 20, 2023, and preparation for its filing, as well as campaign activity, had to occur before that date. Thus, it is impossible that the Florida Igloo PAC had \$0.00 in expenditures during this period because the piece of literature was designed, printed, and publicly distributed during that time period. Therefore, the Florida Igloo PAC filed an inaccurate campaign finance statement, in violation of the MCFA.

Something's Rotten in Lansing

Sponsored Legislation

HB 4567 Absentee ballots issued with NO ID are no longer to be challenged.

HB 4617 Ban "Conversion therapy" for minors.

HJR F Remove gender limitations from marriage. Make marriage gender neutral.

HB 4431 Legalize sodomy and remove it from the Michigan penal code.

Voted Yes

HB 4145 Allows gun confiscation without due process. Red Flag.

HB 4474 Felony charges for "mis-gendering" someone?

SB 7 Provided the funds for CCP Battery Plants. Communist China business investment.

SB 147 Forces employers to pay for elective abortions for their employees.

"Newly Empowered Michigan Democrat Moves on Trans Rights and Guns."



Tell Noah Arbit it's time to



It's Time To Recall Noah Arbit

Arbit may think this is funny but....

"Our State is no laughing matter nor is it some social experiment for children like Noah to push his radically progressive ideology down our throats."

Sign the recall petition today to help us preserve our Republic.



Call 517 885 1172 or

Email- recallmi@proton.me

Michigan.gov

The Office of
Secretary of State Jocelyn Benson

SOS / Elections

Michigan Committee Statement Summary Page

- Committee Name: FLORIDA IGLOO (SUPERPAC)
- Statement Type: JULY QUARTERLY CS
- Statement Year: 2023

« Back to statement details

		This Period	Cumulative for Calendar Year
RECEIPTS			
3. Contributions			
a. Itemized Contributions	(3a.)	\$0.00	
b. Unitemized	(3b.)	\$0.00	(18.) \$0.00
c. Subtotal of Contributions	(3c.)	\$0.00	
			(19.) \$0.00
4. Other Receipts	(4.)	\$0.00	

		This Period		Cumulative for Calendar Year
5. Total Contributions and Other Receipts	(5.)	\$0.00	(20.)	\$0.00

IN-KIND CONTRIBUTIONS

6. In-Kind Contributions

a. Itemized	(6a.)	\$0.00		
b. Unitemized	(6b.)	\$0.00		
7. Total In-Kind Contributions	(7.)	\$0.00	(21.)	\$0.00

EXPENDITURES

8. Expenditures

a. Itemized Direct	(8a.)	\$0.00		
b. Itemized GOTV	(8b.)	\$0.00		
c. In-Kind Expenditures	(8c.)	\$0.00		
d. Unitemized	(8d.)	\$0.00	(22.)	\$0.00
e. Subtotal of Expenditures	(8e.)	\$0.00		
			(23.)	\$0.00
9. Independent Expenditures	(9.)	\$0.00		
			(24.)	\$0.00
9. Total Expenditures	(10.)	\$0.00		

IN-KIND EXPENDITURES

11. In-Kind Expenditures - Endorsements, Donations or	(11.)	\$0.00	(25)	\$0.00
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		This Period	Cumulative for Calendar Year
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Loans of Goods or Services

DEBTS AND OBLIGATIONS

12. Debts and Obligations

a. Owed by the Committee	(12a.)	\$0.00	
b. Owed to the Committee	(12b.)	\$0.00	

BALANCE STATEMENT

13. Ending Balance of last report filed	(13.)	\$0.00	
14. Amount received during reporting period	(14.)	\$0.00	
15. Subtotal	(15.)	\$0.00	
16. Amount Expended during reporting period	(16.)	\$0.00	
17. ENDING BALANCE	(17.)	\$0.00	



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

September 8, 2023

Florida Igloo PAC
195 Harr Trail Rd
Blountville, TN 37617

Re: *Brewer v. Florida Igloo PAC*
Campaign Finance Complaint No. 23-065

Dear Florida Igloo PAC:

The Department of State (Department) has received a formal complaint filed against you by Mark Brewer alleging that you violated the Michigan Campaign Finance Act (MCFA or Act). Specifically, the complaint alleges that you failed to include a proper identification as prescribed in Section 47 of MCFA and that you failed to file accurate or timely campaign finance statements as required under Section 33 of MCFA. A copy of the complaint is included with this notice.

The MCFA and corresponding administrative rules require a person who produces printed material that relates to an election include in addition to the disclosure paid for "with regulated funds" MCL 169.247(4), 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).

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).

As of the date of this letter, the Florida Igloo PAC has not reported any contributions or expenditures to the department.

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 process is included in the Department's campaign finance complaint [guidebook](#).

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. Materials may be emailed to BOERegulatory@michigan.gov or mailed to the Department of State, Bureau of Elections, Richard H. Austin Building, 1st 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 Mr. Brewer, who will have an opportunity to submit a rebuttal statement to the Department. After reviewing 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.

If you have any questions concerning this matter, you may contact the Regulatory Section of the Bureau of Elections at BOERegulatory@Michigan.gov.

Sincerely,

Regulatory Section
Bureau of Elections
Michigan Department of State

Enclosure
c: Mark Brewer

From: [Igloo](#)
To: [MDOS-BOERegulatory](#)
Subject: Campaign Finance complaint 23-065
Date: Saturday, September 23, 2023 2:22:06 PM

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

Bureau of Elections,

This is in response to the complaint filed by Mr. Brewer on 9-08-2023.

First, if any printed materials are to be distributed by Florida Igloo, they will contain the appropriate disclosure statement. No printed materials have been distributed thus far. Print material designs have been suggested but as of yet there aren't any elections with which to participate in and therefore not necessary.

Second, the campaign filing requirement. As of the date of the last filing deadline (7-25 ?) no funds have been received or paid out by the igloo pac. If any contributions or expenditures occur between July 25th and October, they will surely be noted in the next filing.

As to the fine incurred, it is noted that a debt of \$1,000 is owed and we will reach out to the appropriate department Monday (9-25) to make arrangements for payment. This was a simple mistake that was explained to the gentleman over the phone when it was discovered. Not raising or spending any money, incorrectly led us to believe nothing had to be done. Chalk that up to inexperience.

As stated previously, a call will be made to make arrangements to pay the fine and any disclosure info, if needed, will surely be attached to any print materials.

In conclusion, we feel this is an attempt to silence our First Amendment rights before we send anything out.

Thank you for your consideration on this matter.



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

September 26, 2023

Mark Brewer
17000 W. 10 Mile Rd
Southfield, MI 48075

Re: *Brewer v. Florida Igloo PAC*
Campaign Finance Complaint No. 23-065

Dear Mr. Brewer:

The Department of State has received a rebuttal to your response regarding your alleged violation of the Michigan Campaign Finance Act, 1976 P.A. 388, MCL 169.201 *et seq.* A copy of the rebuttal is provided as an attachment with this letter.

At this point, the Department will commence the determination phase of the campaign finance complaint process, during which time all submitted materials will be reviewed. Within 45 business days of its receipt of the enclosed rebuttal, the Department will make a determination as to whether there may be reason to believe that a violation of the MCFA occurred. If you have any questions about this process, you may contact BOERegulatory@Michigan.gov.

Sincerely,

Regulatory Section
Bureau of Elections
Michigan Department of State

Attachment
c: Florida Igloo PAC



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

November 13, 2023

Florida Igloo PAC
195 Harr Trail Rd
Blountville, TN 37617

Re: *Brewer v. Florida Igloo PAC*
Campaign Finance Complaint No. 23-065

Dear Florida Igloo PAC:

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

The complaint alleged that failed to include a proper disclaimer on a flyer to recall Representative Arbit and failed to report these expenses associated with the flyer in your campaign statement.

You responded to the complaint. In your response, you claimed that the flyer was a prototype that was never distributed. Additionally, you indicated that you were unaware that you had to file a campaign statement when you didn't have contributions or expenditures to report. You have since filed these reports in your amended statements.

Mr. Brewer didn't submit a response to your rebuttal.

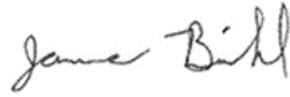
The MCFA requires committees file contributions and expenditures with the appropriate filing official by specific dates. MCL 169.233(1) – (3). The Act requires a committee that receives or expends more than \$1,000 during any election to file campaign finance reports in compliance with the act. MCL 16.233(6). 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).

The Department has reviewed the evidence submitted in this matter and finds that insufficient evidence has been presented to support a finding of a potential violation of the MCFA beyond what has already been addressed in your amended filings.

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

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 dark ink, appearing to read "Jimmy Biehl". The signature is written in a cursive, slightly slanted style.

Jimmy Biehl, Regulatory Attorney
Regulatory Section
Bureau of Elections
Michigan Department of State