



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 Lori Sue Brock		Daytime telephone number 231-250-8882
Mailing address 21750 19 Mile Road		
City Big Rapids	State MI	Zip 49307
Email (<i>recommended</i>) lori@loribrockrealtor.com		

Section 2. Alleged Violator (Respondent)

Name James Chapman, Janet Clark, Denise MacFarlane, Roger Carroll, Dale Jernstadt, James Peek, Gary Todd		
Mailing address 21431 Northland Drive		
City Paris	State MI	Zip 49338
Email (<i>recommended</i>) JimChapman49338@gmail.com		
Committee ID (<i>optional</i>) Green Charter Township Board		

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 169.247 States that political yard signage, whether for a candidate or a ballot question must include a disclaimer that states "paid for by" MCL 169.247 states that signs must be more than 30 feet from the edge of the road way (white line) for highways that do not have curbs.

Explain how these sections were violated:

The Green Charter Township Board has at least 4 large signs placed in Green Charter Township that do not have verbiage on them stating who paid for them. Not all of those signs are at least 30 feet from the edge of the road way. These signs also contain the names: Brock, LaMadline, Finkbeiner, Thorne, Sweet, Harrington & Riebow. None of which were contacted to get their permission to have their names placed on these signs placed in the public by the Green Charter Township Board Members.

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

Photographs and video of signs. (attached to email)
Letter from residents that did not give permission for their names to be on sign. (attached to email)

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.

Lon Brock

Signature of complainant

6-22-2023

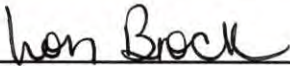
Date

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

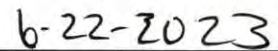
If, after a reasonable inquiry under the circumstances, you are unable to certify that certain factual contentions are supported by evidence as indicated above, you may make the following certification:

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:

N/A



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

To Whom it May Concern:

This letter should be considered evidence for the complaint of the allegation against the Green Charter Township board for placing my name on their sign without my written or verbal permission. The Board did NOT have my permission to use my name on their sign. Below are the signatures of the residents used on the sign along with their addresses and phone numbers.

<i>Lori Brock</i>	dotloop verified 06/23/23 12:18 PM EDT 4SUH-HWVL-JDCL-U0IA	21750 19 Mile Road Big Rapids	231-250-8882
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Lori Brock	Address	Phone Number
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<i>Robin LaMadline</i>	dotloop verified 06/23/23 12:24 AM EDT HBKI-DAZW-Q4OW-ZYDG	21636 Riverhaven Drive Paris	231-349-0419
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Robin LaMadline	Address	Phone Number
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<i>Larry J. Finkbeiner</i>	22705 22 mile Rd	231-850-0077
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Larry Finkbeiner	Address	Phone Number
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<i>Jeffrey Thorne</i>	dotloop verified 06/22/23 9:52 PM EDT AFJ-JWGS-QIZI-XTLF	18540 Newcosta Avenue Big Rapids	231-598-7529
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Jeffrey Thorne	Address	Phone Number
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<i>Brandi Sweet</i>	dotloop verified 06/22/23 2:35 PM EDT KZQ7-ZFAR-IFMZ-FKVG	21618 Riverhaven Drive Paris	231-349-1458
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Brandi Sweet	Address	Phone Number
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<i>Mary Harrington</i>	dotloop verified 06/22/23 1:27 PM EDT QPA8-6EMZ-E8ZV-CRGM	21450 220th Avenue Paris	231-629-1137
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Mary Harrington	Address	Phone Number
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<i>John Riebow</i>	dotloop verified 06/22/23 1:28 PM EDT HAG8-2BFG-B4DG-MPPT	21772 220th Avenue Paris	231-580-7269
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John Riebow	Address	Phone Number
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I, Robin LaMadline never gave permission for anyone to attach my name to signs and especially didn't give permission to have those signs displayed throughout the community. I am not an elected official and I am not running for any type of office. These signs are a violation of my rights and are spreading deformation.

Robin LaMadline

231-349-0419

Robinlamadline1@gmail.com

To whom it may concern:

I, Brandi Sweet- did not give permission for anyone to attach my name to signs and distribute them across town, I feel they have violated my rights. I am not running for any office as they are trying to portray, I simply signed for their recalls and this is clearly retaliation and slanderous.

Brandi Sweet
231 349 1458

Years of Public Service

Chapman 45

Clark 30

MacFarlane 20

Peek 45

Todd 33

Carroll 41

Jernstadt 20

Brock 0?

LaMadline 0?

Finkbeiner 0?

Thorne 0?

Sweet 0?

Harrington 0?

Riebow 0?

Don't Sign Their Petition

Years of Public Service

Chapman	45
Clark	30
MacFarlane	20
Peek	45
Todd	33
Carroll	41
Jernstadt	20

Brock	45
Madline	30
Linkbeiner	20
Thorne	45
Sweet	33
Harrington	41
Riebow	20

Don't Sign Their Petition

DO NOT PASS

Years of Public Service

Chapman	45	Brook	00
Clark	30	LeMedino	00
MacFarlane	20	Finkbeiner	00
Peck	45	Thome	00
Todd	33	Sweet	00
Carroll	41	Hammann	00
Westadt	20	Redmond	00

Petition

NORTHLAND DR

POPLAR RD



Years of Public Service

Chapman	45	Brock	07
Clark	30	LaMadine	03
MacFarlane	20	Firbairn	09
Peek	45	Thorne	05
Todd	33	Sweet	07
Carroll	41	Harrington	07
Jernstadt	20	Riebow	09

Don't Sign Their Petition

Years of Public Service

Chapman	45
Clark	30
MacFarlane	20
Peek	45
Todd	33
Carroll	41
Jernstadt	20

Brock	07
LaMadline	07
Finkbeiner	07
Thorne	07
Sweet	07
Harrington	07
Riebow	07

Don't Sign Their Petition



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

June 30, 2023

Green Charter Township Board
21431 Northland Drive
Paris, MI 49338

Re: *Brock v. Green Charter Township Board*
Campaign Finance Complaint No. 23-040

Dear Green Charter Township Board:

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 yard signs that were displayed around your community. Pictures of the yard signs were included with the complaint; a copy of the complaint is enclosed.

The complaint also indicates that the yard signs in question are located too close to roadways. This allegation does not fall under the MCFA and is not under the Department's purview. Likewise, while the complaint includes several signed letters by parties whose names appeared on the signs without their consent, the complaint does not cite a section of the MCFA which this allegedly violates. Matters such as these may be addressed to local authorities but are not matters of campaign finance subject to the Department's complaint process.

Regarding the identification statement, 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 to 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

c: Lori Sue Brock