

**STATE OF MICHIGAN
SECRETARY OF STATE**

In re: Michigan Campaign Finance Complaint against
Highland Park City Clerk Brenda Green and Highland Park City
Treasurer Janice Taylor-Bibbs and Their Respective Candidate
Committees.

NOW COMES, ROBERT DAVIS, a natural person, being first
duly sworn and deposed, and under the penalty of perjury, states the
following:

1. Pursuant to MCL 169.215(5) and (6) of the Michigan Campaign
Finance Act (MCFA), I, Robert Davis, hereby submit this
complaint against **Highland Park City Clerk Brenda Green
and Highland Park City Treasurer Janice Taylor-Bibbs
and their respective candidate committees for violating
various provisions of the Michigan Campaign Finance
Act.**
2. My address and telephone number are as follows: Robert Davis,
180 Eason, Highland Park, MI 48203, (313) 523-7118.
3. The address for alleged violators **Brenda Green and the
Friends To Elect Brenda Green (Committee ID #82-
15533)** is: 143 E. Grand, Highland Park, MI 48225. Phone
number is: (313) .

4. The address for alleged violators **Janice Taylor-Bibbs and Friends to Elect Janice Bibbs (Committee ID # 82-152226)** is: **32 Midland, Highland Park, MI 48203**. Phone number is (313) .
5. Brenda Green originally filed as a candidate for re-election for the office of Highland Park City Clerk to qualify for the August 2022 primary election by filing a \$100 filing fee and affidavit of identity in accordance with the Highland Park City Charter.
6. However, per the holding in *Davis v Highland Park City Clerk*, unpublished per curiam opinion of Court of Appeals, issued June, 2,2022 (Docket No. 361544), the Highland Park Election Commission decertified and removed Brenda Green's name from appearing on the August 2022 primary and November 2022 general election ballots.
7. No primary election was held for the office of Highland Park City Clerk.
8. Accordingly, on September 14, 2022, pursuant to MCL 168.737a, Brenda Green filed a declaration of intent to be a

write-in candidate for the office of Highland Park City Clerk for the November 8, 2022 general election.

9. Pursuant to MCL 169.236(6) of the Michigan Campaign Finance Act, Brenda Green's candidate committee, Friends to Elect Brenda Green, Committee ID # 82-155333, is registered with the Wayne County Clerk.
10. Pursuant to MCL 169.224(5), Brenda Green's candidate committee requested a waiver and further declared that they were not going to receive and/or expend in excess of \$1,000 during the election cycle.
11. Janice Taylor-Bibbs originally filed as a candidate for re-election for the office of Highland Park City Treasurer to qualify for the August 2022 primary election by filing a \$100 filing fee and affidavit of identity in accordance with the Highland Park City Charter.
12. However, per the holding in *Davis v Highland Park City Clerk*, unpublished per curiam opinion of Court of Appeals, issued June, 2, 2022 (Docket No. 361544), the Highland Park Election Commission decertified and removed Janice Taylor

Bibb's name from appearing on the August 2022 primary and November 2022 general election ballots.

13. No primary election was held for the office of Highland Park City Treasurer.

14. Accordingly, on September 14, 2022, pursuant to MCL 168.737a, Brenda Green filed a declaration of intent to be a write-in candidate for the office of Highland Park City Clerk for the November 8, 2022 general election.

15. Pursuant to MCL 169.236(6) of the Michigan Campaign Finance Act, Janice Taylor-Bibb's candidate committee, Friends to Elect Janice Bibbs, Committee ID # 82-152226, is registered with the Wayne County Clerk.

16. Pursuant to MCL 169.224(5), Janice Taylor Bibb's candidate committee requested a waiver and further declared that they were not going to receive and/or expend in excess of \$1,000 during the election cycle.

17. On January 11, 2022, I personally reviewed the Wayne County Clerk's campaign finance public database to review the

campaign finance filings submitted by Brenda Green's and Janice Taylor-Bibbs' candidate committees.

18. The Wayne County Clerk's campaign finance public database indicates that both Brenda Green's and Janice Taylor-Bibb's candidate committees did not file any campaign finance reports, other than their statement of organizations, which indicated that their respective candidate committees were not going to receive and/or expend in excess of \$1,000.
19. However, during the election cycle for the November 8, 2022 general election, I have first-hand knowledge that Brenda Green's and Janice Taylor-Bibb's respective candidate committee expended in excess of \$1,000.
20. As a duly registered voter of the City of Highland Park, I received at my Highland Park residence a well-designed full color mailer in his mailbox from Brenda Green's and Janice Taylor-Bibb's candidate committees advertising their write-in candidacies for their respective offices for the November 8, 2022 general election. **(See Green's and Taylor-Bibb's full-color flyer attached).**

21. Brenda Green's and Janice Taylor-Bibb's full-color mailer was mailed by well-known mailing house, Bresser's, located in the city of Detroit. This fact can be easily confirmed by the Bulk Rate Permit #6067, which was printed on the front of their mailer. **(See Green's and Taylor-Bibb's full-color flyer attached).**
22. Brenda Green's and Janice Taylor-Bibbs' full-color mailer was mailed city-wide, and it is estimated that it was mailed to at least 2,600 registered voters in the city of Highland Park.
23. **The costs associated with the postage for the mailing along with the administrative costs charged by Bresser's easily exceeded \$1,000. (See Green's and Taylor-Bibb's full-color flyer attached).**
24. **Additionally, the costs associated with the design and printing of Brenda Green's and Janice Taylor-Bibbs' full-color mailer, which included the prized "union bug", also easily exceed \$1,000. (See Green's and Taylor-Bibb's full-color flyer attached).**

25. Moreover, I was told by citizens who reside in various senior citizen buildings located within the City of Highland Park that Brenda Green and Janice Taylor-Bibbs held senior luncheons in the various senior complexes, which one would assume were paid for by Brenda Green's and Janice Taylor-Bibbs' candidate committees.

26. Because there is ample evidence that Brenda Green's and Janice Taylor-Bibbs' candidate committees expended in excess of \$1,000, pursuant to the Michigan Campaign Finance Act, they must be ordered to amend their respective statement of organizations and properly declare that they expended and/or received in excess of \$1,000.

27. Additionally, Brenda Green and Janice Taylor Bibbs must also be ordered to file the required campaign finance reports with the Wayne County Clerk's office detailing their expenditure and contributions.

28. I am requesting the Secretary of State to advise and direct the Wayne County Clerk and her campaign finance compliance staff to assess late filing fees against Brenda Green's and

Janice Taylor-Bibbs' respective candidate committees for failing to file an amended statement of organization properly declaring that they expended more than \$1,000 during the election cycle.

29. I am requesting the Secretary of State to advise and direct the Wayne County Clerk and her campaign finance compliance staff to issue letters to Brenda Green's and Janice Taylor-Bibbs' candidate committees directing them to file campaign statements required under MCL 169.233 and 169.235 and assess the appropriate late filing fees, if necessary.

30. If called and sworn as a witness, I am competent to testify as to the facts stated herein.

31. 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.

FURTHER AFFIANT SAYETH NOT.



ROBERT DAVIS

180 Eason

Highland Park, MI 48203

(313) 523-7118

Davisrobert854@gmail.com

Subscribed and sworn to before me

On this 11th day of January, 2023




Notary Public Signature

Merna Nissan
Printed Name of Notary Public

State of Michigan, County of Oakland

My Commission Expires May 10, 2024

Acting in the County of Oakland

Cc: Hon. Cathy M. Garrett, Wayne County Clerk
Greg Mahar, Director of Elections for Wayne County
Gil Flowers, Wayne Co. Clerk's Office Campaign Finance Division

Write-in to Elect **BOTH** Candidates

Dear Highland Parkers, As City Clerk and City Treasurer, we have done our absolute best to serve the citizens of Highland Park with honesty and integrity. Due to a confusing candidate affidavit, many candidates were thrown off the ballot and the court stated that the rule was confusing but didn't allow either Brenda Green or Janice Bibbs to appear on the ballot. We are presenting ourselves as write-in candidates and would like you to continue to support us so we can continue to serve you. God Bless You and the City of Highland Park.



Janice Bibbs
Candidate for Treasurer

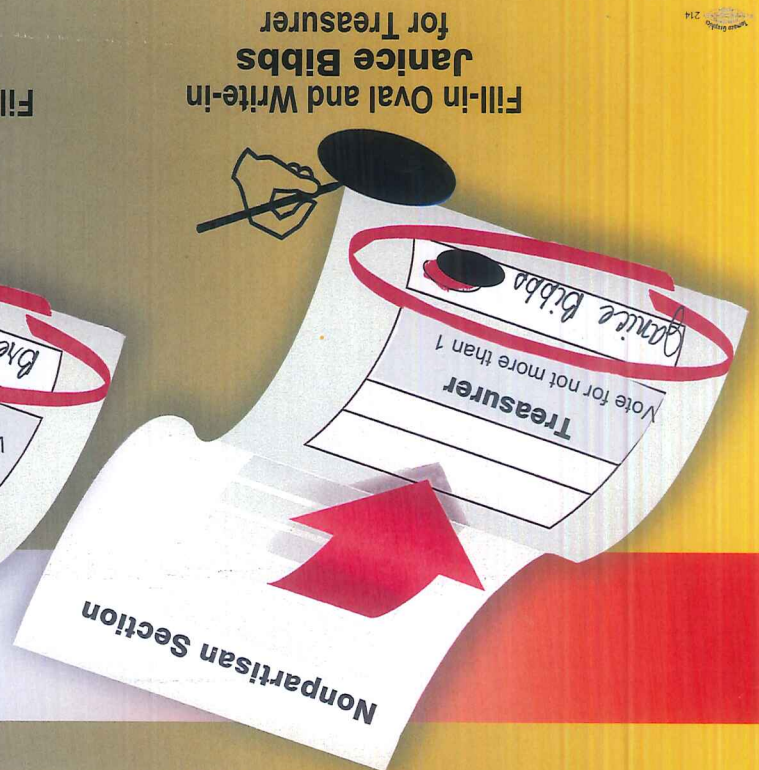
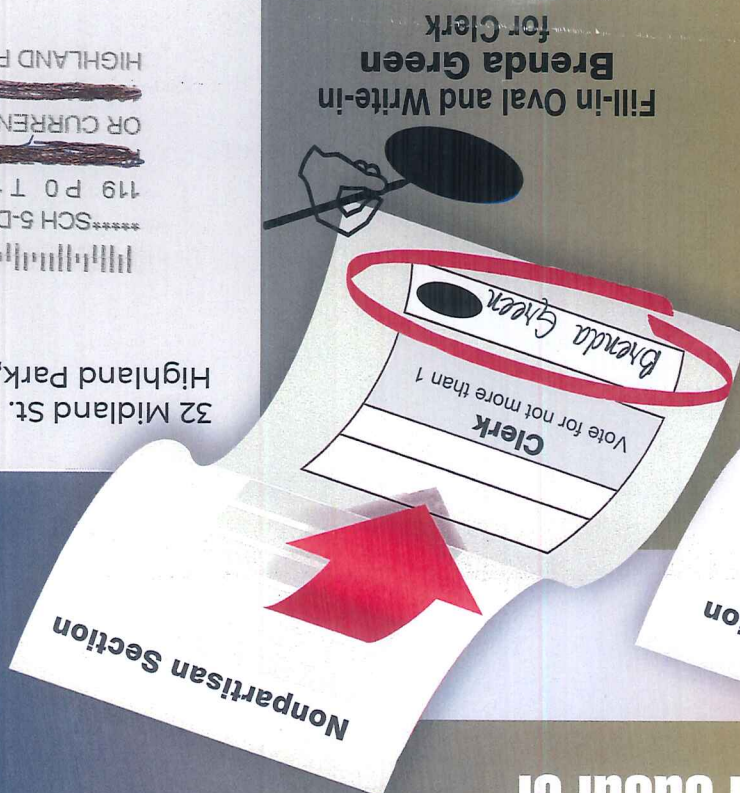


Brenda Green
Candidate for City Clerk



PRSR STD
U.S. Postage
PAID
Permit #6067
Detroit, MI

32 Midland St.
Highland Park, MI 48203
*****SCH 5-DIGIT 48212
119 P0 T1 P1
OR CURRENT RESIDENT
HIGHLAND PARK MI 48203-2707



Brenda Green
for Clerk

Janice Bibbs
for Treasurer

Take a minute and WRITE-IN BOTH Candidates

Write-In to Elect BOTH Candidates

**On the Ballot:
Fill in OVAL and
Write-in name**



Janice Bibbs
for Highland Park Treasurer

**Your Treasurer has Integrity, Accountability,
is Honest, and a Dedicated Public Servant.**

- ◆ A Life-Long Highland Parker
- ◆ Highland Park High School graduate, Class of 1971
Bachelor of Science Degree in Accounting from Mercy College (currently U of D Mercy)
- ◆ Master's Degree in Finance from Walsh College
- ◆ Lifelong member of Lomax Temple A.M.E. Zion Church
- ◆ Michigan Certified Professional Treasurer Certification from Michigan Municipal Treasurers Association
- ◆ Member of Wayne County Treasurer's Association
- ◆ Member of Michigan Municipal Treasures Association

IMPLEMENTED

- ◆ A System to accept payments of \$50.00 or more on Taxes to assist with Tax bill payments before returned to County Treasurer
- ◆ Access to Online property tax and/or assessment information
- ◆ Use of Credit/Debit Cards for payments on bills
- ◆ Payment plans on Delinquent Personal Property Taxes

Email: jbtbibbs@gmail.com



Fill in OVAL and WRITE-IN
JANICE BIBBS
for Highland Park City Treasurer

Vote November 8, 2022

Paid for by Friends to Elect Janice Bibbs - Write In
32 Midland • Highland Park, Michigan 48203

**On the Ballot:
Fill in OVAL and
Write-in name**



Brenda Green
for Highland Park City Clerk

- ◆ Life-Long resident of Highland Park
- ◆ A product of the Highland Park School District
- ◆ Thompson Elementary, Ferris Middle school
- ◆ Highland Park High Class of 1971

COMMUNITY INVOLVEMENT

- ◆ Treasurer of E. Grand Block Club
- ◆ Past President Boys & Girls Club for the Mothers Club
- ◆ Co-Chair 2009 Michigan Week Parade
- ◆ Volunteer 2010 HP Water Distribution
- ◆ 1984 – Hired by the Late City Clerk Jean Green
- ◆ 1989 – Appointed Director of Elections/Deputy Clerk by the Late City Clerk Mattie Carter

IMPLEMENTED

- ◆ Dog license application on-line
- ◆ On-line Business License Application
- ◆ Council Agendas and Minutes on-line
- ◆ Established Permanent Absentee Voter list
- ◆ Website notifications of Important election matters

PERSONAL

- ◆ Mother of one son
- ◆ Member of Russell Street Baptist Church

PROFESSIONAL MEMBERSHIPS

- ◆ Association of Wayne County Clerks
- ◆ Michigan Municipal Clerks Association
- ◆ International Institute of Municipal Clerks
- ◆ Highland Park Business Association
- ◆ Obtain Certification as a Professional Certified Municipal Clerk-CMU

Email: hpclerk2012@gmail.com



Fill in OVAL and WRITE-IN
BRENDA GREEN
for Highland Park City Clerk

Paid for by Friends to Elect Brenda Green - Write In for City Clerk
143 E. Grand St. • Highland Park, Michigan 48203

February 6, 2023

State of Michigan
Regulatory Section
Bureau of Elections
Jocelyn Benson, Secretary of State
Department of State Lansing, MI

Re: Davis v. Green & Taylor-Bibbs
Campaign Finance Complaint No. 23-004

Honorable Secretary of State:

Here is my answer to a formal complaint filed against me by Robert Davis.

The Committee/Friends to elect Brenda Green, Write-in as City Clerk, **DID NOT** violate the Michigan Campaign Finance Act (waiver). I **DID NOT** expend more than \$1,000 in the 2022 election cycle.

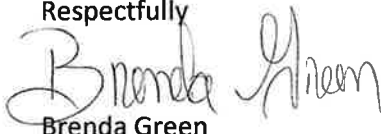
Mr. Robert Davis alleges that Brenda Green's full-color mailer was mailed city wide. **NOT TRUE**
A city-wide mailing for the City of Highland Park would be approximately 8,230 voters NOT 2,600.

Mr. Robert Davis also alleges, through (HEARSAY) NO EVIDENCE. I held senior luncheons in various senior complexes. **NOT TRUE**

I did not hold or pay for ANY senior luncheons in any senior complexes.

I am emailing this answer to the Regulatory Section, with a hard copy mailed by USPS.

Respectfully

A handwritten signature in cursive script that reads "Brenda Green". The signature is written in dark ink and is positioned above the printed name.

Brenda Green
143 E. Grand
Highland Park, MI 48203

Janice Taylor-Bibbs
32 Midland
Highland Park, Michigan 48203

February 6, 2023

Jocelyn Benson, Secretary of State
State of Michigan
Regulatory Section
Bureau of Elections
Michigan Department of State

RE: Davis v. Green & Taylor-Bibbs
Campaign Finance Complaint No. 23-004

Honorable Secretary of State:

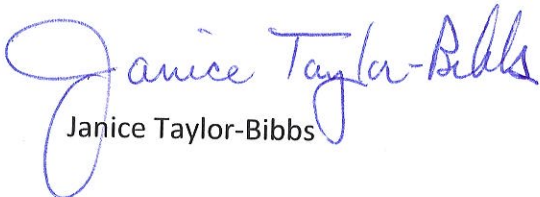
This is my answer to a formal complaint filed against me by Robert Davis.

The Committee – Friends of Janice Taylor-Bibbs – Write-in as City Treasurer, **DID NOT** Violate the Michigan Campaign Finance Act (Waiver). **I DID NOT EXPEND** more than \$1,000.00 in the 2022 Election Cycle.

Mr. Robert Davis alleged the Janice Taylor-Bibbs full color-mailer was mailed City wide. **NO TRUE** A City-wide mailing for the City of Highland Park would be approximately 8,230 voters NOT 2,600.

Mr. Robert Davis also alleges, through HEARSAY, (**NO EVIDENCE**), that I held Senior Citizen luncheons at various Senior Citizen complexes. **NOT TRUE**
I DID NOT Participate and/or Pay for any Senior Citizen luncheons at any Senior Complex.

Respectfully submitted,


Janice Taylor-Bibbs



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

February 8, 2023

Robert Davis
180 Eason
Highland Park, MI 48203

Re: *Davis v. Green & Taylor-Bibbs*
Campaign Finance Complaint No. 23-004

Via email

Dear Mr. Davis:

The Department of State received responses from Ms. Green and Ms. Taylor-Bibbs to the complaint you filed against them alleging a violation of the Michigan Campaign Finance Act, 1976 P.A. 388, MCL 169.201 *et seq.* Copies of the responses are 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 or mailed to the Department of State, Bureau of Elections, Richard H. Austin Building, 1st Floor, 430 West Allegan Street, Lansing, Michigan 48918.

Sincerely,

Regulatory Section
Bureau of Elections
Michigan Department of State

c: Brenda Green
Janice Taylor-Bibbs



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

April 5, 2023

Brenda Green
143 E. Grand
Highland Park, MI 48225

Janice Taylor-Bibbs
32 Midland
Highland Park, MI 48203

Re: *Davis v. Green & Taylor-Bibbs*
Campaign Finance Complaint No. 23-004

Dear Ms. Green and Ms. Taylor-Bibbs:

The Department of State (Department) has finished investigating the campaign finance complaint filed against you by Robert Davis 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 requested and obtained a waiver indicating your committee would not receive or expend in excess of \$1,000 during the election cycle, but that materials produced by your candidate committees indicated that your expenditures exceeded that amount.

You responded to the complaint in letters dated February 6, 2023. In your response, you stated that you did not expend more than \$1,000 in the 2022 election cycle. You argued that the mailer was not mailed city-wide, as Mr. Davis alleged. Further, you argued that you did not participate and/or pay for any senior citizen lunches at any senior complex, as was also alleged in his complaint.

The Department emailed Mr. Davis on February 8, 2023, advising him of his opportunity to submit a rebuttal statement within 10 business days, which would be February 23. On February 24, 2023, Mr. Davis emailed the Department to ask for an extension. On February 27, 2023, the Department responded, advising Mr. Davis that the deadline had expired and that the statute requires a showing of good cause in order for the Department to grant an extension. The email asked Mr. Davis to "describe in greater detail the good cause for why an extension, requested after the deadline, should be granted." No response to the email or rebuttal statement from Mr. Davis was ever received.

In the absence of a rebuttal statement, the Department proceeds to the determination phase with the evidence submitted.

The MCFA requires committees to 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. Mr. Davis alleged that the flyer would cost more than the \$2,000 collective amount¹ that Ms. Green and Ms. Taylor-Bibbs attested that they would not exceed, but he provides no meaningful support for that allegation. Given Ms. Green and Ms. Taylor-Bibbs' responses that they did not exceed \$1,000 each and an absence of a rebuttal from Mr. Davis, the evidence provided is not sufficient for the Department to find reason to believe that a violation may have occurred.

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,



Adam Fracassi, Regulatory Manager
Regulatory Section
Bureau of Election
Michigan Department of State

c: Robert Davis

¹ Because this mailer was a joint expenditure, the *total* cost of the expenditure could be more than \$1,000 so long as each candidate *proportionally* was under \$1,000.