



Michigan Department of State Campaign Finance Complaint Form

BUREAU OF ELECTIONS 430 W. ALLEGAN STREET • RICHARD H. AUSTIN BUILDING – 1 • LANSING,
MICHIGAN 48918 5th Floor

2020 AUG 26 PM 2:23

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 Linda Jackson		Daytime Telephone Number 313-213-6004
Mailing Address 24344 Lyndon		
City Redford	MI	48239
lindaforredford@gmail.com		

Section 2. Alleged Violator

Name Anthony Yanish		
Mailing Address 11792 Hazelton		
City Redford	State MI	Zip 48239
Email (optional) tonyyanish2020@gmail.com		

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

Section(s) of the MCFA alleged to be violated: Mr. Yanish violated Section 169.204 Section 4 (1) & (2) He also violated Section 169.206 Sections (1) & (a)

Explain how those sections were violated: Section 169.204 Sections (1) & (a) was violated because Mr. Yanish had expenses that far exceed what he reported on his campaign statement. He had signs all over the Redford Township (a copy of one of his signs is attached). He consistently advertised in the local paper the Redford Connection. (copies of those ads with the prices charged or estimated are attached) An advertisement by Mr. Yanish was seen during the Al Sharpton Show on MSNBC (This ad was witnessed by Mr. James Brown 313-770-1266). Mr. Brown only saw the ad once. It could have aired other times. The estimated cost of one ad for this time segment is \$13,000.

Mr. Yanish had a video on his Facebook page discussing how a secret donor provided him with 45,000 pieces of literature. This page was removed shortly after elections results were known. Mr. Yanish lost the election.

169.206 Section (1) (a) Was violated because thousands of dollars of contributions were not reported. I have a good authority that the donor for these unreported contributions is Cvetko Zdravkovski aka Steve DiMaggio.

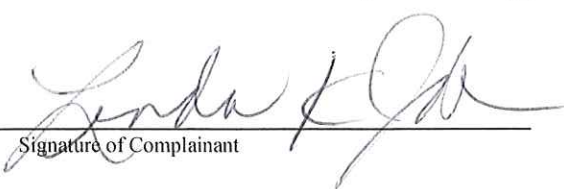
Evidence included with the submission of the complaint that supports the allegations:

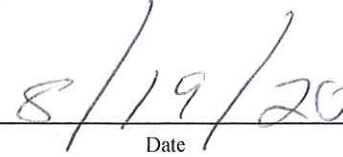
Copies of advertisements printed in the Redford Connection with price list. Copy of campaign sign and name and contact of witness who saw

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

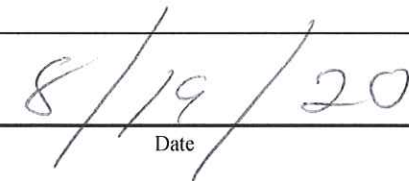
Section 5. Certification without Evidence (Supplemental to Section 4)

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

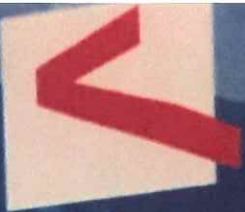
Section 15(8) of the MCFA provides that a person who files a complaint with a false certification is responsible for a civil violation of the MCFA. The person may be required to pay a civil fine of up to \$1,000.00 and some, or all, of the expenses incurred by the Michigan Department of State and the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

*This is a copy of one of his signs
These were all over Redford*



VOTE AUGUST 4TH

TONY YANISH

FOR

SUPERVISOR

LET'S BUILD

REDFORD

TOGETHER



PAID FOR BY THE
FRIENDS OF TONY YANISH
11792 HAZELTON,
REDFORD, MI 48239



**Tony Yanish For Redford Supervisor 2020
"Let's Build Redford Together"**

A New Redford from the ashes of the COVID 19 Ghost Town will be challenging to accomplish, yet I feel confident that with a fresh now board and supervisor that it is possible.

Tony Yanish has a vision for our future and is all about thinking outside of the box. His vision is refreshing and necessary to revive Redford Township.

Tony's background consists of grassroots work from Organizing For America, For Our Future and Michigan United. He also has worked in congress as congressional liaison for the 14th District of Michigan. I listened in on a very energized and driven group of people who Tony motivates and they are ready and able to lead the new Board of Trustees. I am very impressed by his innovative ideas, and to hear such a diverse group of people working together was refreshing. This attitude is needed in Redford and a far cry from the present board.

Tony Yanish and a new board (my opinion) have the right ideas to move Redford into the future for everyone: young, elderly, rich, poor, middle class, working class, and unemployed. Homeowners, renters, businesses and those that work, play, worship and learn in our township deserve better.

This is
a full
page ad
cost is
~~(\$650.00)~~
\$650.00
online only



"Let's Build Redford Together"

Hello, my name is Tony Yanish, and I'm running to be your next Supervisor of Redford Township. I am 53, A Community & Grassroots Organizer, A father of 3 Wonderful kids, former Staffer to U.S. Congresswoman Brenda Lawrence, and worked with many grassroots organization, just to name a few MI United, For Our Future, Organizers for America and Oak Street Health For Seniors.

Some of Redford's pressing issues have been going on since 2008 and my opponent has not come up with viable solutions to this very day. Old ideas worked, and Redford's finances are a mess with excessive debt and the township's future is headed into a even bigger mess, yet there is hope and there are ways to solve our problems. I have the solutions to Redford's problems. With new leadership, we can climb out of this financial problem that holds us back from moving forward, 12 years is too long, I ask you to vote for me if you would like to see Redford grow and be successful. Redford Township's most pressing problems are taxes, public safety, property value and lack of jobs. As Redford's Supervisor my vision is to support small businesses through tax incentives, bring new businesses into Redford Township, reform our public safety to be more efficient, ensure all guidelines are followed for transparency to the public, build a township that will see it's home value rise and help homeowners by working with the homeowners to allow them to purchase the home in which they are renting. As Supervisor I will focus on creating new jobs for our residents, for every new job that comes to Redford we will require 30% of their staff be Redford residents. This will reduce our unemployment and in return build our economy.

The state of our township's pensions is also strained. Our pension is specifically dedicated to police and fire operations, three separate mileages support the police and fire, one for pension and it is still not enough. There are a few ways to solve this problem, we can look at the bond itself for the pension, we can now and change the cost through new hires through a contract with the people if Redford residents refuse to renew the mileage which is the one that pays for the pension it will help avoid this problem, remember this is just one option. We must work together to avoid more financial hardship and stop taxing the residents and businesses. We also must look at our municipal services and reduce them. Redford Township is 11.2 square miles and offers municipal services with far less funding than our neighboring townships and Dearborn. One thing as Supervisor I will focus on creating services through Partnerships with local schools, churches, and volunteer agencies, empowering local groups of the residents to create beneficial partnerships with the township. We have a bright future ahead of us here in Redford, and we deserve better, and I ask you to work together and stay focus, commit collectively we can build a better Redford together and make it a global force.

"S BUILD REDFORD TOGETHER"

Go to www.tonyyanish2020.com for more information.

TONY YANISH FOR REDFORD SUPERVISOR AUGUST 4TH

Paid For By The Friends Of Tony Yanish



Dad



Tony with Lt. Governor, Garza



Tony with Seniors



Coventry Place I and II Apartments



Affordable Studio and
One Bedroom Apartments



Now Accepting
Applications for
Applicants 62 or Older

24200 Cathedral Avenue
Redford, MI 48239
(313) 531-5335
CoventryPlace@voami.org

Cost at least \$680.00

Cost is \$ 960.00

AUGUST 2020

Redford Connection

"Let's Build Redford Together"

Hello, my name is Tony Yanish, and I'm running to be your next Supervisor of Redford Township. I am 53, A Community & Grassroots Organizer, A father of 3 Wonderful kids, former Staffer to U.S. Congresswoman Brenda Lawrence, and worked with many grassroots organization, just to name a few MI United, For Our Future, Organizers for America and Oak Street Health For Seniors.

Some of Redford's pressing problems have been going on since 2008 and my opponent has not been able to come up with viable solutions to this very day. Old ideas have not worked, and Redford's finances are a mess with excessive spending, and the township's future is headed into a even bigger financial crisis, yet there is hope and there are ways to solve our problems and I believe I have the solutions to Redford's problems.

With new innovative ideas,

we can climb out of this financial problem that holds Redford back from moving forward, 12 years is to long, I ask you to consider someone new if you would like to see Redford grow and be prosper.



Redford Township's most pressing problems are taxes, public safety, transparency, property value and lack of jobs. As Redford's next Supervisor my vision is to support small businesses through tax to drive business into Redford Township, reform our public safety to be more diverse, ensure all guidelines are

followed for transparency to the public and build a township that will see it's home value rise and help renters become homeowners by working with the homeowners to allow renters to purchase the home in which they are renting.

As Supervisor I will also focus on creating new jobs for our residents, for every new business that comes to Redford



Dad



Tony w

we will require 30% of their staff be Redford residents. This will reduce our unemployment and in return build our revenue.

The state of our township's pensions is also strained. Our townships mileage is specifically dedicated to police and fire operations and pensions, three separate mileages support the police and fire, one specifically for pension and it is still not enough. There are a few ways to resolve the problem, we can look at the bond itself for the pension as it is right now and change the cost through new hires through a mandate of the people if Redford residents refuse to renew the mileage on exit 345 which is the one that pays for the pension it will help avoid bankruptcy, remember this is just one option.

We must work together right now in order to avoid

more fi
stop ta
busine
at our
improv
is 11.2
the sar
with fa
neighb
and De
One
focus
through
school
and vo
empow
townsh
partne
We ha
of us h
deserv
if we w
focus,
can rel
make i



"LET'S BUILD REDFORD TOGETHER"

Go to www.tonyyanish2020.com for
VOTE TONY YANISH FOR REDFFORD SUP

Cost is at least \$680

2020

Redford Connection

IN'T AFFORD THE RISK,
LOSE NEW LEADERSHIP!

By: TONY YANISH

As we continue to deal with COVID – 19, unemployment, businesses struggling, police reform and so much more in our society, we can no longer invest our hopes in old ideas, lack of leadership with our current board, and we can no longer allow ourselves to elect a leader because they sit on several boards. One of my opponents Pat McRae continues to make the statement of sitting on several boards and having 12 years of experience leading Redford. Our budget has not grown. Our employment has not grown. Our taxes are one of the highest and our future seems uncertain. After 12 years under his leadership and 4 years under this current board of trustees?!



Tony Yanish COVID – 19 COMMUNITY TESTING
Yes that is me getting tested.

WE NEED TO VOTE FOR
NEW LEADERS NOW!

decide if this board of trustees and my opponents are capable of us through these uncertain times? I say "NO", the board and my for Redford supervisor have done nothing during this pandemic Redford tested.
re they when we need leadership for getting testing in Redford as I wave of COVID – 19 rises here in Redford. We have the highest surrounding Detroit and not one leader has stepped up to help us?!
iors are the highest risk and our leadership and my opponents Redford supervisor have not invested in ensuring the senior's ne public at large.
y Yanish running to be your Supervisor of Redford and I took the my campaign to the side to ensure that we have several testing in Redford and the surrounding areas.
der, one of the jobs is to adapt to situations as they come, to be able ob done without excuses or blaming others as the current board of nd my opponents have been doing. Blaming others for not getting re lacks leadership. This board of trustees or as the board likes to elves "The 4" and my opponents running for supervisor continue others shows we will be putting Redford at risk in the immediate d future if we re-elect this board or Pat McRae.

se vote for me
ny Yanish for
ord Supervisor
ed true leadership



BE A HERO!

Covid-19 Testing

July 25th

10am to 2pm

EL BETHEL
CHURCH REDFORD

and

DETROIT WORLD
OUTREACH
REDFORD, MI

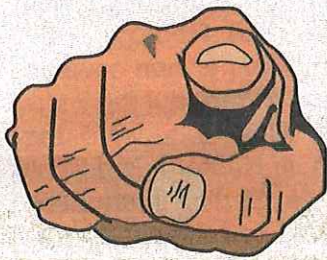
Organized by:
Tony Yanish



Photo by Photovs Dreamstir

Tony is the only candidate sponsoring Help for the Heroes of R through the pandemic

WE
WANT
YOU!



TO ADVERTISE WITH US!

Redford Connection

Your ads will be seen by 40,000 to 60,000 reader

313-533-7366



40 YRS EXPERIENCE

25105 Six Mile Rd.

Michael Lawr
Broker/Own
Notary
Hud Proper
Bank Foreclo
Est. 1988



Redford Connection

26085 West Six Mile Road
Redford, Michigan 48240

Voice: 313/532-0770 - Fax: 313/532-0774

2016 Monthly Rate Sheet *

Redford Connection Monthly Advertising Rates for 2016			Cost Per Delivered BW Copy
Size	Black & White	Color	
	\$	\$	\$
1/4 page	430		0.022
Contract for 3 or more	290	50	0.015
1/8 page	170		0.009
Contract for 3 or more	140	25	0.007
1/3 page	460		0.023
Contract for 3 or more	320	75	0.016
Banner	350		0.018
Contract for 3 or more	170	50	0.009
1/2 page	580		0.029
Contract for 3 or more	400	100	0.02
Full Page	1150		0.058
Contract for 3 or more	810	150	0.041
Business Cards	110		0.006
Contract for 3	90	25	0.005
Inserts	900		0.045
Contract for 3	800	N/A	0.04

* Locking advertisements to specific pages
may incur additional charges

Ads were sold at the
3 or more Contract
prices



26085 West Six Mile Road
Redford, Michigan 48240

Voice: 313/533-7366 - Fax: 313/532-0774
2020 Monthly Rate Sheet *

Redford Connection Monthly Space Rates

	Political Ads	Color	Delivered
Size	B/W	Premium	Copy Cost Est.
	\$	\$	\$
1/8 page	140	25	0.009
Contract for 3 or more	140	25	0.007
1/4 page	250	50	0.022
Contract for 3 or more	250	50	0.015
1/3 page	300	75	0.023
Contract for 3 or more	300	75	0.016
1/2 page	350	100	0.029
Contract for 3 or more	350	100	0.020
Full Page	500	150	0.058
Contract for 3 or more	500	150	0.041

**There is a standard disclaimer for Elected Official Columns as the opinion
of the Official**

Placement of ads on a specific page may be additional cost.

Costs per delivery are estimated



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

October 9, 2020

Anthony Yanish
11792 Hazelton
Redford, MI 48239

Re: *Jackson v. Yanish*
Campaign Finance Complaint
No. 2020-8-151-33

Dear Mr. Yanish:

The Department of State (Department) received a formal complaint filed by Linda Jackson 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.

The MCFA requires candidates and committees file contributions and expenditures with the appropriate filing official by specific dates. MCL 169.233(1) – (3). The MCFA 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 169.233(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).

Ms. Jackson alleges that you have failed to properly report several expenditures.

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 investigation process is enclosed with this letter and a copy is 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. Due to the ongoing public health emergency, the Department asks that all materials be submitted via email to Elections@Michigan.gov to my attention. 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. Jackson, 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 33(11) of the Act.

If you have any questions concerning this matter, you may contact me via email.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam Fracassi". The signature is stylized with a large, looped "A" and a cursive "Fracassi".

Adam Fracassi
Bureau of Elections
Michigan Department of State

c: Linda Jackson

Fracassi, Adam (MDOS)

From: ACTION WAY MOTIVATIONAL <adyanish712@gmail.com>
Sent: Friday, November 13, 2020 9:23 AM
To: Fracassi, Adam (MDOS)
Subject: Re: Complaint

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

Good morning Adam,

I have explained in my campaign financing with Wayne County.

Mr. Flowers (Campaign Finance Manager of Wayne County) help guide me in my filing of the billboard. Each individual who was on the billboard had to file an individual cost of donation concerning the billboard, it was an in-kind donation toward my campaign that did not violate the contribution act.

I have a question, who do I file with concerning the fraudulent action of Trustee Kim Taylor? Do I make a complaint to your office or another office? My complaint has documents involving, trying to get access to my background online in what seems to be a fraudulent manner. The documents are sent directly from her. I need to know what are my options, please?

I lost my race on August 4th under unusual circumstances, the board of canvass acknowledges that there are discrepancies with the count but I chose not to pursue the matter to keep the integrity of our election from being harmed any further.

She continues to harass me with this filing after I explained and submitted all documents.

Concerning Trustee Linda Jackson, it was an in-kind donation concerning my yard signs, which donor name is filed with the campaign finance.

Concerning the article cost in the Redford Connection, she is inaccurate in her statement of the cost for placing an ad in the paper she and others just recently forced out of business.

I will send you the cost I was charged for the paper no later than Monday evening (if it's ok with you sir)?

Concerning the Al Sharpton show and who she says "I have it on good authority" and she gave the name of the person who she states her information comes from, he is inaccurate on this information. I will send you a charge cost of what I was asked to pay for a campaign ad to be run.

I have started the process of legal action against the complaints and the gentleman that Trustee Jackson mentions in her complaint. My lawyers have taken the time to investigate why these Redford Board Of Trustees continue to file financial complaints against me and others.

My race was clean, open, and transparent.

If there is anything that you would like from me please let me know sir, I would like to move beyond this campaign as quickly as possible.

By the way, I apologize for the delay in response, I have been in the process of moving for the last 5 days.

Thank you
Anthony Yanish
313-460-9799

On Mon, Nov 2, 2020 at 12:55 PM Fracassi, Adam (MDOS) <FracassiA@michigan.gov> wrote:

Thank you for that. To date, there are two complaints that I have sent you in which I have not received a response. I am including all the information in this email. I will give you 15 business days from the date of this email to respond to each (your response to the complaint is due on or before 11/25/2020). You may send it by email to me, if you would like.

Thanks,

Adam Fracassi, Election Law Attorney

Michigan Bureau of Elections

P.O. Box 20126

Lansing, Michigan 48901

From: ACTION WAY MOTIVATIONAL <adyanish712@gmail.com>

Sent: Monday, November 2, 2020 12:38 PM

To: Fracassi, Adam (MDOS) <FracassiA@michigan.gov>

Subject: Re: Complaint

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

My concern is that I received a complaint from your office.

I got this on Saturday 27th of October which was much later than I could respond concerning the due date to respond.

My question is, how do I respond online to these allegation?

Case #2020-8-151-33

Anthony Yanish

313-460-9799

On Fri, Oct 30, 2020, 12:39 PM Fracassi, Adam (MDOS) <FracassiA@michigan.gov> wrote:

Mr. Yanish,

Please let me know what you need to speak about.

Thanks,

Adam Fracassi, Election Law Attorney

Michigan Bureau of Elections

P.O. Box 20126

Lansing, Michigan 48901

From: Miller, Cheryl (MDOS) <MillerC60@michigan.gov>
Sent: Friday, October 30, 2020 12:29 PM
To: ACTION WAY MOTIVATIONAL <adyanish712@gmail.com>
Cc: Fracassi, Adam (MDOS) <FracassiA@michigan.gov>
Subject: RE: Complaint

Mr. Yanish –

This is notice of a formal complaint filed against you that is being investigated by the Department of State. The person you need to talk to is Adam Fracassi. He is copied on this email.

Sincerely-

Cheryl Miller

Cheryl Miller, Department Analyst

Disclosure Data Division

Michigan Department of State

Bureau of Elections

www.Michigan.gov/campaignfinance

Campaign Finance Common Filing Dates

Follow us on Twitter @MICHCFR

The Bureau of Elections provides general information regarding compliance matters, not legal, accounting, or other professional advice regarding any specific situation. The best course of action is to contact your own attorney, accountant or other professional for guidance.

Email communications between the Bureau of Elections and outside individuals are considered a part of the public record and can be requested under FOIA. Emails are reviewed for content and may be placed on the Bureau of Election's website as a public record.

From: ACTION WAY MOTIVATIONAL <adyanish712@gmail.com>
Sent: Friday, October 30, 2020 12:16 PM
To: Miller, Cheryl (MDOS) <MillerC60@michigan.gov>
Subject: Re: Complaint

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

Here is the letter I received. Please help with whom I need to speak with about this complaint.

Thank you



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

March 1, 2022

SECOND NOTICE

Anthony Yanish
11792 Hazelton
Redford, MI 48239

Via Certified mail

Re: *Jackson v. Yanish*
Campaign Finance Complaint No. 2020-08-151-33

Dear Mr. Yanish:

By correspondence dated April 16, 2021, the Department of State (Department) advised you of its intention to investigate a complaint filed against you by Linda Jackson 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. Jackson.

Sincerely,

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

Adam Fracassi
Bureau of Elections
Michigan Department of State

SENDER: COMPLETE THIS SECTION

- ☐ Complete items 1, 2, and 3.
- ☐ Print your name and address on the reverse so that we can return the card to you.
- ☐ Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:



9590 9402 1449 5329 9709 97

2. Article Number (Transfer from service label)

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- | | |
|--|---|
| <input type="checkbox"/> Adult Signature | <input type="checkbox"/> Priority Mail Express® |
| <input type="checkbox"/> Adult Signature Restricted Delivery | <input type="checkbox"/> Registered Mail™ |
| <input type="checkbox"/> Certified Mail® | <input type="checkbox"/> Registered Mail Restricted Delivery |
| <input type="checkbox"/> Certified Mail Restricted Delivery | <input type="checkbox"/> Return Receipt for Merchandise |
| <input type="checkbox"/> Collect on Delivery | <input type="checkbox"/> Signature Confirmation™ |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery | <input type="checkbox"/> Signature Confirmation Restricted Delivery |
| <input type="checkbox"/> Insured Mail | |
| <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500) | |



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

October 27, 2022

Anthony Yanish
11792 Hazelton
Redford, MI 48239

Re: *Jackson v. Yanish*
Campaign Finance Complaint No. 2020-8-151-33

Dear Mr. Yanish:

The Department of State (Department) has finished investigating the campaign finance complaint filed against you by Linda Jackson on August 26, 2020. This letter concerns the disposition of that complaint.

The complaint alleged you violated the Michigan Campaign Finance Act (MCFA or Act) by failing to properly report expenditures related to your 2020 campaign for Redford Township Supervisor. The complaint included copies of several advertisements and mailers advocating your election, as well as documents estimating the cost of these materials.

The Department twice invited you to respond to Ms. Jackson's complaint, once by regular mail and once by certified mail. The certified mail correspondence, dated October 9, 2020, informed you that a failure to respond within 15 business days of that notice would leave the Department with no alternative but to make its determination based solely on the documentation furnished by Ms. Jackson. You responded via email on November 13, 2020.

In Michigan, candidates and committees are required to file contributions and expenditures with the appropriate filing official by specific dates. MCL 169.233(1) – (3). The MCFA requires a committee that receives or expends more than \$1,000.00 during any election to file campaign finance reports in compliance with the Act. MCL 169.233(6).¹ A committee which fails to file a campaign statement required under the Act is subject to late filing fees. MCL 169.233(7). Moreover, if a candidate fails to file two or more statements required under section 33 or section 35 of the Act and those statements remain unfiled for more than 30 days, the candidate "is guilty

¹ A candidate committee that receives less than \$1,000 in contributions and makes less than \$1,000 in expenditures during the election cycle may request a reporting waiver on their Statement of Organization relieving the committee of the duty to file campaign statements. Because you did not file a Statement of Organization, however, you could not have requested the reporting waiver.

of a misdemeanor punishable by a fine of not more than \$1,000.00 or imprisonment for not more than 90 days, or both.” MCL 169.233(8).

This letter serves to notify you that the Department has determined there may be reason to believe that you have violated the Act. The complaint alleged that you had not filed required campaign finance statements with the Wayne County Clerk. A search of the Wayne County Campaign Finance database shows that your committee, Friends of Anthony Yanish, did not file any campaign statements or Statement of Organization with the Wayne County Clerk after your Affidavit of Identity was submitted on May 5, 2020. Accordingly, the Department concludes a potential violation has occurred.

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 March 16, 2022, 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 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 March 16, 2022, the Department will have no choice but to seek the aforementioned remedies.

Sincerely,

Regulatory Division
Bureau of Elections
Michigan Department of State

c: Linda Jackson



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

March 16, 2023

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

Re: *Jackson v. Yanish*
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