

**Campaign Finance Complaint Form**  
**Michigan Department of State**

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MICHIGAN DEPT OF STATE

2022 NOV 16 PM 2:39

This complaint form may be used to file a complaint alleging that someone violated the Michigan Campaign Finance Act (the MCFA, 1976 PA 388, as amended; MCL 169.201 *et seq.*).

All information on the form must be provided along with an original signature and evidence.

**Please print or type all information.**

I allege that the MCFA was violated as follows:

Section 1. Complainant		
Your Name Christie Koester		Daytime Telephone Number 812-219-9860
Mailing Address 617 Oldfield Dr. SE		
City Byron Center	State MI	Zip 49315

Section 2. Alleged Violator		
Name Thalia Tilma		
Mailing Address 7234 NANTUCKET DR SW		
City Byron Center	State MI	Zip 49315

**Section 3. Alleged Violations** (Use additional sheet if more space is needed.)

Section(s) of the MCFA violated:

169.233 - Not filing financial statements/reporting after passing \$1,000 in spending and again by 10/28/22

Explain how those sections were violated:

Thalia Tilma, Byron Center school board candidate, spent significantly more than \$1,000 on her campaign and did not submit required financial reports disclosing expenditures and income sources. According to Kent County Clerk's Office, reports should have been filed once the \$1,000 limit was surpassed and again by 10/28/22 to fully disclose to voters where these campaign funds were coming from.

In addition to yard signs, which would have pushed the campaign past the \$1,000 reporting threshold by early October, this candidate's campaign materials included a two-sided full color flyer that was included in a bag of GOP flyers given out door to door in Byron Center and a two sided full color postcard that was mailed to every household in Byron Center, arriving in mailboxes 11/4/22. Additionally, many households in BC received campaign texts from this campaign on 11/7 and 11/8. I'm unsure of how much those cost or how they acquired that list.

- yard signs - 200x\$5-\$6/sign = \$1,000-\$1,200 per candidate
- postcards mailed to 20,000+ households = conservative guess of \$10,000 (cost shared among 3 candidates), cost of printing, preparing for bulk mail, postage
- postcards included in GOP bag for door to door = conservative guess of \$2,000-\$3,000, depending on quantity
- texts to majority of BC voters = no idea how much this costs

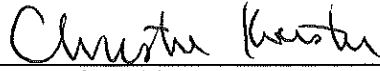
Evidence that supports those allegations (attach copies of pertinent documents and other information):

Attached are screen captures of quantity of yard signs produced, images of full color flyer included in canvassing bag with other political party affiliates, the mass mailed flyer to all households in Byron Center, and a screen capture of the texts sent to a majority of Byron Center voters.

**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

11/10/2022

Date

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

**Section 15(6) of the MCFA (MCL 169.215) requires that the signed certification found in section 4 of this form be included in every complaint.** However, if, after a reasonable inquiry under the circumstances, you are unable to certify that certain factual contentions are supported by evidence, you may also 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:*

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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.**

Mail or deliver the completed complaint form with an **original signature and evidence** to the following address:

Michigan Department of State  
Bureau of Elections  
Richard H. Austin Building – 1st Floor  
430 West Allegan Street  
Lansing, Michigan 48918

**BYRON BULLDOGS**  
FOR SCHOOL BOARD  
Your school board candidates committed to Byron Center and family values:

 Elect  
**Amber Swift**

 Elect  
**Danial Sherwood**

 Elect  
**Thalia Tilma**

Paid for by Committee to Elect Amber Swift  
2869 Byron Square Dr SW, Byron Center, MI 49315

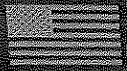
Paid for by Committee to Elect Danial Sherwood  
6036 Grandview Dr SE, Byron Center, MI 49315

Paid for by Committee to Elect Thalia Tilma  
2234 Highland Dr NW, Byron Center MI 49315

**VOTE**  
FOR FAMILY VALUES  
**NOV 8**



— MAILER SENT TO EVERY  
BYRON CENTER RESIDENT



# BYRON BULLDOGS

FOR BYRON CENTER SCHOOL BOARD



## Defend Parental Rights

Parental rights are essential and their input should be respected, not disregarded. Parents can and should have the right to opt their children out for health, safety, or religious reasons. A school system should never come between parents and their children.



## Empower Teachers & Staff

We have the area's best and brightest teachers. We must ensure they have the proper resources to guide our children successfully. Let's attract more educators so the ones we have can best utilize their most valuable asset – time.



## Endorsed by Educational & Community Leaders

*Mom's For Liberty, Nonprofit Organization*

*Tom McMillin & Nikki Snyder, MI State Board of Education*

*Bernadette Smith, MIGOP Ethnic Vice Chair*

*Tom Hooker, Former State Representative District 77*

*Angela Rigas, Candidate For State Representative District 78*



## Ensure A Safe Learning Environment

Protect our children from internal and external threats. Ensure an unbiased curriculum, free from indoctrination or destruction of family values. Ensure our campus has the best and most up-to-date security practices.



## Promote Skilled Trades

Higher education is a great option, but not the only option. We must prepare students for college while offering tools for a thriving career in the skilled trades, the arts, STEM fields, military service, and public service.



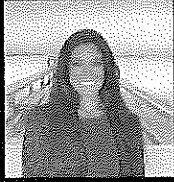
OR CURRENT RESIDENT

BYRON CENTER, MI 49315-9765

# BYRON BULLDOGS

## FOR SCHOOL BOARD

Your school board candidates committed to Byron Center and family values:



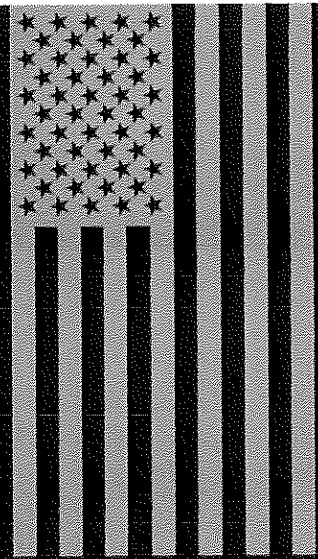
Elect  
**Amber Swift**



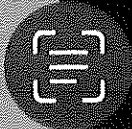
Elect  
**Daniel Sherwood**



Elect  
**Thalia Tilma**



**VOTE**  
FOR FAMILY VALUES  
**NOV 8**



- FULL COLOR POSTCARDS PRINTED  
AND INCLUDED IN DOOR-TO-DOOR  
CAMPAIGNING BY GOP CANDIDATES
- 1000'S ESTIMATED PRINTED



# BYRON BULLDOGS

FOR BYRON CENTER SCHOOL BOARD



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Higher education is a great option, but not the only option. We must prepare students for college while offering tools for a thriving career in the skilled trades, the arts, STEM fields, military service, and public service.

Head for the Committee to Best Model School  
2023-2024 Byron Center School Board

Head for the Committee to Best Model School  
2023-2024 Byron Center School Board

Head for the Committee to Best Model School  
2023-2024 Byron Center School Board





## BYRON BULLDOGS FOR SCHOOL BOARD

Your school board candidates committed to Byron Center and family values



Elect  
**Amber Swift**

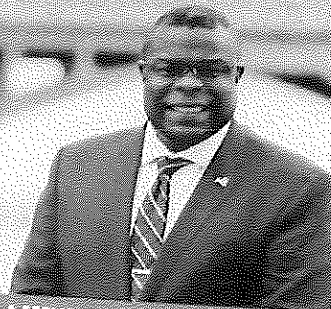


Elect  
**Daniel Sherwood**



Elect  
**Thalia Tilma**

## ★ JOHN GIBBS FOR CONGRESS



A SERVANT'S HEART FOR WEST MICHIGAN

### About John

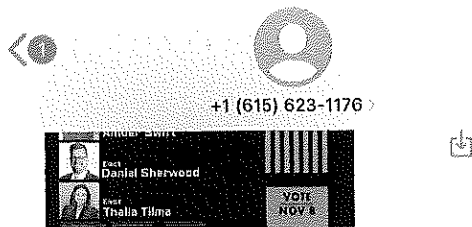
- ▶ Born and raised in Michigan to Democrat parents who instilled in him the power of education and hard work
- ▶ Truly living the American Dream as the grandson of Black sharecroppers from the deep south and the first in his family to go to college
- ▶ Attended Stanford University and went on to get a master's degree in Public Administration from Harvard University
- ▶ Served as a Christian Missionary in Japan, spreading the Gospel for 7 years
- ▶ Served as Assistant Secretary under Dr. Ben Carson at the Department of Housing and Urban Development

Vote John Gibbs for Michigan's  
Third Congressional District

[@JohnGibbsForMI](#)
[@VoteJohnGibbs](#)







TEXT MESSAGE SENT  
TO MOST BYRON CENTER  
VOTERS 11/7-11/8/22

Byron Center residents,  
Tomorrow is Election Day. Elect  
your Common Sense  
Conservative School Board  
candidates: Amber SWIFT, Daniel  
SHERWOOD, and Thalia TILMA!  
They will be strong advocates for  
families.

Endorsed by Educational &  
Community Leaders:

Mom's for Liberty: Nonprofit  
Organization

Tom McMillin & Nikki Snyder: MI  
State Board of Education

Angela Rigas: Republican  
Nominee for the 79th State  
House District

Tom Hooker: Former State  
Representative

Bernadette Smith: MIGOP Ethnic  
Vice Chair

Reply STOP to End



Text Message





thalia tilma for byron center school



All Posts People Groups Events Photos

**Thalia Tilma for Byron Center School Board** • Follow

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Mon at 11:02 PM ·

Byron Center residents, Tomorrow is Election Day. Thank you for electing your Common Sense Conservative School Board candidates: Amber SWIFT, Daniel SHERWOOD, and Thalia TILMA! We will be strong advocates for families.

Endorsed by Educational & Community Leaders:

Mom's for Liberty: Nonprofit Organization

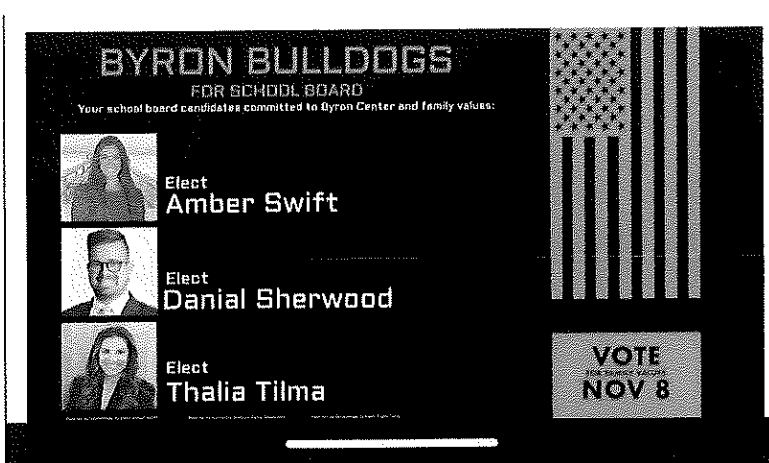
Tom McMillin & Nikki Snyder: MI State Board of Education

Angela Rigas: Republican Nominee for the 79th State House District

Tom Hooker: Former State Representative

Bernadette Smith: MIGOP Ethnic Vice Chair

— CANDIDATE REPOSTING  
TEXT MESSAGE  
VERBATIM





Thalia Tilma for Byron Center Sc...



Home

About

Posts


Photos

Community

**Thalia Tilma for Byron Center School Board**

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Sep 28 at 2:46 PM ·

Good day family, friends and fellow Byron Center neighbors,

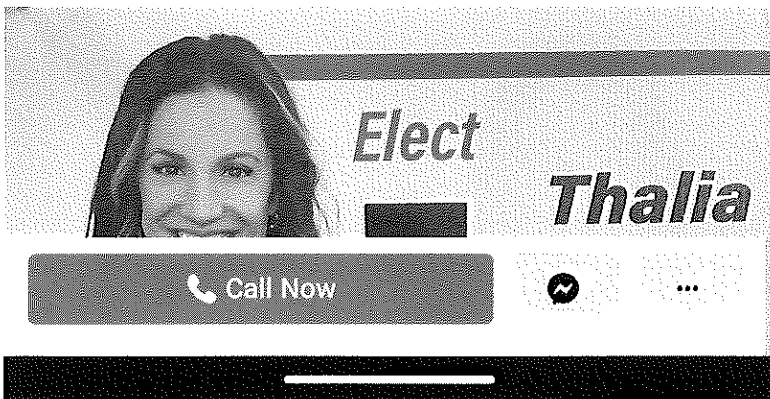
Thank you so much to everyone who has let me put a sign in your yard! I am so thankful and grateful to every one of you!! I have been able to put up almost 100 signs and this is ALL thanks to YOU!!

I still have a little over 100 to go and I would love to get them up in the next week. I am looking for address/locations where people would like a sign. If you know of anyone who would be willing to put one in their yard please either message me on FB or reach out via text message. My phone number is (616) 520-3995.

Thank you so much in advance.

Blessings,

Thalia Tilma



- 200+ YARD  
SIGNS, PER  
CANDIDATE POST



***Elect***

***Thalia***  
**TILMA**



***for***  
***School Board***

Paid for by the CTE Thalia Tilma, 7234 Nantucket Dr. Byron Center, MI 49315

## MDOS-BOERegulatory

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**From:** Thalia Tilma <thalia\_tilma@yahoo.com>  
**Sent:** Friday, December 23, 2022 10:30 AM  
**To:** MDOS-BOERegulatory  
**Subject:** Campaign finance complaint No. 2022-11-210-233

CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)

Good day,

I am writing this letter in response to Re: Koester v. Tilma Campaign Finance Complaint No. 2022 - 11 - 210 - 233.

I have filed the appropriate paperwork as of 12/07/22. I went in to look at everything yesterday and to the best of my knowledge it is done correctly.

Best Regards,  
Thalia Tilma

Sent from my iPhone





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

December 28, 2022

Christie Koester  
617 Oldfield Dr. SE  
Byron Center, MI 49315

Re: *Koester v. Tilma*  
Campaign Finance Complaint No. 2022 – 11 – 210 – 233

Dear Ms. Koester:

The Department of State received a response from Thalia Tilma to the complaint you filed against her alleging a violation of the Michigan Campaign Finance Act, 1976 P.A. 388, MCL 169.201 *et seq.* A copy of the response is 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](mailto:BOERegulatory@michigan.gov) or mailed to the Department of State, Bureau of Elections, Richard H. Austin Building, 1<sup>st</sup> Floor, 430 West Allegan Street, Lansing, Michigan 48918.

Sincerely,

Regulatory Section  
Bureau of Elections  
Michigan Department of State

## MDOS-BOERegulatory

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**From:** Christie Koester <christiewahlert@gmail.com>  
**Sent:** Monday, January 9, 2023 8:08 AM  
**To:** MDOS-BOERegulatory  
**Subject:** Koester v. Tilma, Campaign Finance Complaint No. 2022-11-210-233

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

Good morning.

I received the candidate's response and noted there were updated campaign finance documents submitted on 12/7/22. I am questioning the expense for the full color, large postcards mailed to every household in Byron Center, postage for those many thousands of postcards, additional postcards printed and included in GOP literature, and texts sent to every area number (listed as \$1,472.27). Another candidate also indicated that she and the two candidates creating these postcards together used an external graphic designer to design their postcards, and I am not seeing that expense or in-kind donation listed, either.

As a voter, I expected to be able to see how much our candidates spent by election day on their campaigns, as is required by campaign finance law, and who contributed to each campaign. Unfortunately, this candidate did not make this possible, and I hope the Department of State considers this carefully when reviewing and considering appropriate fines.

Sincerely,  
Christie Koester



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

February 24, 2023

Thalia Tilma  
7234 Nantucket Dr. SW  
Byron Center, MI 49315

Re: *Koester v. Tilma*  
Campaign Finance Complaint No. 2022-11-210-233

Dear Ms. Tilma:

The Department of State (Department) has finished investigating the campaign finance complaint filed against you by Christie Koester 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 did not file the appropriate financial statements after spending more than \$1,000 in expenditures on yard signs, two-sided full color postcards, and two-sided full color fliers in support of your candidacy.

You responded to the complaint by email on December 23, 2022. In your response, you stated that you filed the appropriate paperwork as of December 7, 2022. You indicated that you went in, presumably to the Kent County Clerk's office, on December 22, 2022 and that to the best of your knowledge it was done correctly

Ms. Koester provided a rebuttal to your response in an email dated January 9, 2023. In that statement, she noted that there were indeed updated campaign finance documents submitted on December 7, 2022. However, she questioned the expenses you disclosed in your reports. She argued that the \$1,472 you reported for the "full color, large postcards mailed to every household in Byron Center, postage for those many thousands of postcards, additional postcards printed and included in GOP literature, and texts sent to every area number" was too low.

Further, she stated that she expects to be able to assess how much candidates spend on their elections and she feels that you deprived her of that ability.

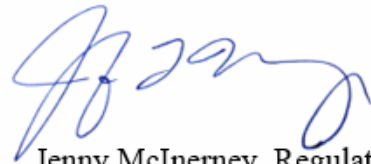
The MCFA requires committees file contributions and expenditures with the appropriate filing official by specific dates. MCL 169.233(1) – (3). The Act requires a committee that receives or expends more than \$1,000 during any election to file campaign finance reports in compliance with the act. MCL 16.233(6). 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 independently reviewed the Kent County Campaign Finance website. When you filed your statement of organization on February 17, 2022, you indicated that you were applying for the reporting waiver, which means that you are not subject to reporting requirements as long as you do not spend or receive more than \$1,000 in the election. Because there is no indication that you spent or received more than \$1,000 during the pre-general reporting period, you were not required to file a pre-general statement. You filed your post-election statement on December 7, 2022, ahead of the December 8, 2022 due date. In that statement, you reported that you received contributions of \$500 and in-kind contributions from yourself of \$1,253.56, triggering the reporting requirement. You subsequently filed your annual statement on December 22, 2022, ahead of the January 31, 2023 due date.

Upon review of the evidence submitted, the Department finds that insufficient evidence has been presented to support a finding of a potential violation of the MCFA. You have filed all required statements, and have disclosed the expenditures referenced in the complaint. Accordingly, 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](mailto:BOERegulatory@Michigan.gov).

Sincerely,



Jenny McInerney, Regulatory Attorney  
Bureau of Elections  
Michigan Department of State

c:     Christie Koester  
       Ruth Wilke  
       Gavin Wilke