# 48B918ED-1ACD-4EFF-AC95-3F155003E876 --- 2022/10/21 04:51:27 -7:00 --- Remote Notary

# STATE OF MICHIGAN **BUREAU OF ELECTIONS**

# **CAMPAIGN FINANCE COMPLAINT**

#### Section 1. COMPLAINANT

League of Women Voters - Michigan 600 W St. Joseph St. Lansing MI 48933-2288

#### Section 2. ALLEGED VIOLATOR

Protect MI Voter ID 43313 Woodward Ave. #1115 Bloomfield Hills, MI 48302

#### Section 3. ALLEGATIONS

Sections of Michigan Campaign Finance Act (MCFA) alleged to be violated: MCL 169.221(3) and (6).

#### STATEMENT OF FACTS

1. "Committee" is defined in Sec. 3(4) of the MCFA, MCL 169.203(4), as a:

> person who received contributions or makes expenditures for the purpose of influencing or attempting to influence the action of voters for or against the nomination or election of a candidate, the qualification, passage or defeat of a ballot question or the qualification of a new political party, if contributions received total \$500.00 or more in a calendar year or expenditures total \$500.00 or more in a calendar year....An individual, other than a candidate, does not constitute a committee. A person, other than a committee registered under this act, making an expenditure to a ballot question committee or an independent expenditure committee, shall not, for that reason, be considered a committee or be required to file a report for the purposes of this act unless the person solicits or receives contributions for the purpose of making an expenditure to that ballot question committee or independent expenditure committee.

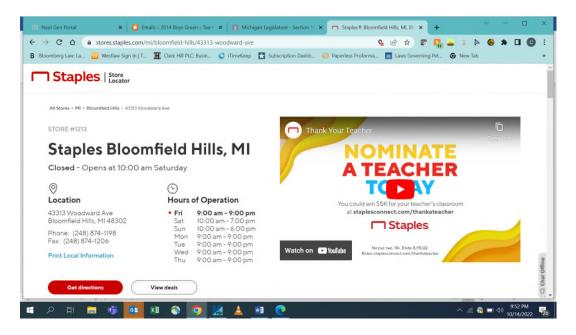
2. "Person" is defined in Sec. 11(2) of the MCFA, MCL 169.211(2) as:



a business, individual, proprietorship, limited liability company, firm, partnership, joint venture, syndicate, business trust, labor organization, company, corporation, association, committee, or any other organization or group of persons acting jointly.

- 3. Section 24(3) and (4) of the MCFA, MCL 169.221, sets forth mandatory requirements on individuals who may serve as a Treasurer for a ballot question committee:
  - (3) A committee other than a candidate committee must have a treasurer who is a qualified elector of this state if the committee conducts business through an office or other facility located in this state.
  - (4) If a committee is not required to have as its treasurer an individual who is a qualified elector of this state, the committee may have as its treasurer an individual who is a resident of another state. A committee with a nonresident treasurer shall file. with its statement of organization, an irrevocable written stipulation, signed by the treasurer, that legal process agreeing affecting committee, served on the secretary of state or an agent designated by the secretary of state, has the same effect as if personally served on the **committee.** This appointment remains in force as long as any liability of the committee remains outstanding within this state.
- 4. Section 24(6) of the MCFA, MCL 169.221, also mandates that ballot question committees operating in Michigan must have an official depository in the state:
  - (6) Except as provided by law, a candidate committee or a committee described in subsection (3) shall have 1 account in a financial institution in this state as an official depository to deposit all contributions received by the committee in the form of or which are converted to money, checks, or other negotiable instruments and to make all expenditures. The committee shall designate that financial institution as its official depository.

- 5. Section 24(1) of the MCFA, MCL 169.224(1), requires a committee to file a statement of organization within 10 days of its formation.
- 6. Protect MI Voter ID filed its original Statement of Organization ("S of O") to form a ballot question committee on September 8, 2022 with the Bureau of Elections. (Ex. 1). Initially, Protect MI Voter ID indicated that it was formed to support the "Secure MI Vote" ballot initiative. <u>Id</u>.
- 7. On the same date, September 8, 2022, Protect MI Voter ID filed an amended S of O indicating that it was formed to "oppose" the "Promote the Vote [2022]" ballot proposal (i.e., Proposal 2). (Ex. 2).
- 8. On both the Original and Amended S of O, Protect MI Voter ID indicated that its Committee Address and Treasurer Address as 43313 Woodward Ave. #1115, Bloomfield [Hills], MI 48302. This is a business address for a Staples Store:



9. Staples provides a service to customers called iPostal1. According to the Staples website, "Your postal mail or parcels from any carrier can be received, forwarded, scanned, recycled, shredded, or picked up at your local



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store without the sender knowing it is a Staples address." (Ex. 3). This is not a street address as required on a S of O, but rather the equivalent to a PO Box.

- Upon information and belief, the Treasurer for Protect MI Voter ID, Dustin
   McIntyre is a resident and registered voter in Virginia.
- 11. While in its Original S of O Protect MI Voter ID checked "Out of State Committee Treasurer Irrevocable Written Stipulation," Protect MI Voter ID is not eligible to select an out-of-state treasurer because it indicates that it is operating its committee out of the Staples store in Bloomfield Hills. Stated differently, if Protect MI Voter ID is using a Michigan street address for its committee it is required to have a qualified Michigan voter as its treasurer and a primary depository located in this state pursuant to MCL 169.211(3) and (6).

### SUMMARY OF ALLEGED VIOLATIONS

- 12. Based on these facts and the applicable law:
  - (a) Protect MI Voter ID does not have a valid street address for its committee and its Treasure as required by the Michigan Campaign Finance Act in violation of MCL 169.221.
  - (b) Protect MI Voter ID does not a primary depository in the State of Michigan in violation of MCL 169.221.

# Section 4. CERTIFICATION

13. I certify 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.

Christina Marie Schlitt		Date: _	10/21/2022
Christina Schlitt			
Notory			
Notary:			
State of <u>Texas</u>	_ County of _	Dallas	
The foregoing instrume	nt was ackno	wledged before	e me
this 21 day of Oc	tober, 2022		
by			
Cynthia Birl		, Notary	Public
My Commission Expire	es <u>08/31/2</u>	024	



Notarial act performed by audio-visual communication

Notarial act performed by audio-visual communication



# Exhibit 1 LWV-MI / PMIVoter ID - Complaint

531159

# STATEMENT OF ORGANIZATION FORM FOR BALLOT QUESTION COMMITTEES

Print, sign, and mail a copy of this Statement of Organization to the Bureau of Elections to complete this request. All information disclosed on this form will be available to the public.

Committee ID:	Type of Filing:	Date Submitted:	Date Committee Formed:	
	original	09/08/2022	09/08/2022	
List the specific ballot prope	osal(s) involved usi	ng the official ballot designation	n if available and mark support or oppos	e
asappropriate.				•
SECURE MI VOTE		Support		
Ballot Proposal District: Sta				
Full Name of Committee (mu PROTECT MI VOTER ID	st include Candidate's first ar	nd last name)		
Acronym Or Abreviation				
		Out of State Committe Stipulation.	ee Treasurer Irrevocable Written	Ø
Primary Email Contact				
	FO@FECCOMPLIANCE	GROUP.COM		
Committee Street Address -	No PO Boxes		iling Address - May be PO Box	
43313 WOODWARD AVE #1155		43313 WOODWAF	· ·	
BLOOMFIELD 48302	MI	BLOOMFIELD 48302	MI	
		48302	8045910050	
Treasurer Full Name MCINTYRE	DUSTI	N.		
Treasurer Business Address		Treasurer Ma	l Address	•
		43313 WOODWAR	D AVE#1155	
	MI	BLOOMFIELD	`MI	
		48302	8045910050	
Designated Record Keeper )	Full Name	Designated Re	cord Keeper Address	
			MI	
Official Depository		Secondary De	oository	
CHAIN BRIDGE BANK		,	,	
1445-A LAUGHLIN AVE		•		
MCLEAN	VA			
22101				
☑ Electronic Filing			•	
Reporting Waiver		Yes	☑ No	
Verification:				
I/We certify that all reasonable	e diligence was used	in the preparation of the above	statement and that the contents	
are true, accurate and complet	e to the best of my/c	our knowledge or belief. If filing	electronically, we further agree that the	
			teness of each statement filed electronically	
			n of each statement electronically filed by the	
	ts of each statement	will be true, accurate and comp	lete to the best of my/our knowledge or belie	ef.
(Sign Name and Date)				
Treasurer:	Date:	Designated Record Keeper	Date:	
Dun Min	9/8/72			

Please email, fax, mail, or hand deliver a signed copy of the Statement of Organization using one of the following methods:

Email: Disclosure@Michigan.gov

Fax: 517-335-3235

First Class, Certified, Registered and Priority Mail: Michigan Department of State Bureau of Elections P.O. Box 20126 Lansing, MI 48901-0726 Hand Delivered and Overnight Delivery Service: Bureau of Elections 430 West Allegan Street 1st Floor, Richard H. Austin Building Lansing, MI 48918

eSofO-ID: 7831

Authority granted under Act 388 of 1976, as amended

# **Exhibit 2 LWV-MI / PMIVoter ID - Complaint**

Primary Email Address: INFO@FECCOMPLIANCEGROUP.COM

**Primary Contact: Treasurer** 

Comm. ID#: 521014

Type of Filing: Amendment

Date Submitted:

9/8/2022

Requested Date Formed:

9/8/2022 Acronym:

Comm. Type: BAL

Committee Legal Name: PROTECT MI VOTER ID

Sponsor Type:

Sponsor:

Electronic Filing?: Y

Requested Waiver?: N

Committee Mail Address:

43313 WOODWARD AVE #1155

Committee Street Address: 43313 WOODWARD AVE #1155

BLOOMFIELD MI 48302-

BLOOMFIELD

MI 48302-

Comm. Phone: (804) 591-0050 Email:

Treasurer Name - Last:

First Name:

Middle Name:

Phone: (804) 591-0050

OOS? Y

MCINTYRE

DUSTIN

Email:

Treasurer Mail Address:

43313 WOODWARD AVE #1155

BLOOMFIELD

MI 48302-

531245

Treasurer Business Address:

Ι

Record Keeper Name - Last: First:

Middle:

Record Keeper Address:

Phone:

Phone:

Email:

Official Depository:

Secondary Depository:

CHAIN BRIDGE BANK 1445-A LAUGHLIN AVE

MCLEAN

VA 22101-

Candidate Name - Last:

First Name:

Middle Name:

Party:

County of Residence:

Public Funding?:

Office Sought:

District Sought:

Support/Oppose:

Ballot Issue:

BQ continued or State/Local:

Oppose

PROMOTE THE VOTE

PP Qualifying?: PP County: PP District:

SSF?:

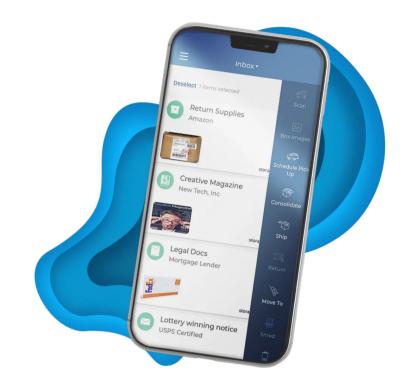


# iPostal1 is the mail service that does it all

Get a physical mailing address with your name or your company name and a Staples store address. Your postal mail or parcels from any carrier can be received, forwarded, scanned, recycled, shredded, or picked up at your local store without the sender knowing it is a Staples address.

Make your local Staples store your address. <u>Learn</u> more.

Plans starting at \$9.99



Get a physical mailing address at a Staples store for your postal mail or parcels. View an outside image of your mail as soon as it's received. Use a free app or your laptop to forward mail, request a content scan or schedule a pickup.

Great for business or personal use. Register your business, upgrade your company image and protect your privacy. Stay connected to your mail when traveling. Stop worrying about porch pirates when you're not at home.





# You need a real street address,

not a P.O. Box, to register an LLC.

# Secure your mail — from business to personal.

# **Business**

Use your new address to register your business, create a professional image, and protect your privacy. Add phone and fax to create a Virtual Office. Ideal for small office and home businesses, Entrepreneurs and start-ups, and companies that want a presence in many markets.

# **Personal**

Stay connected to your mail when you're on the road. Stop worrying about porch pirates stealing your packages when you're not at home. Ideal for Individuals and families, travelers, vacationers, RV'ers, expats and students.

iPostal1 is available in over 1,000 select Staples Stores - get started today!

# STATE OF MICHIGAN BUREAU OF ELECTIONS

# CAMPAIGN FINANCE COMPLAINT

Section 1. COMPLAINANT

League of Women Voters-Michigan 600 W. St. Joseph St., Suite 3G Lansing, MI 48922-2288

Section 2. ALLEGED VIOLATOR

Protect MI Voter ID 43313 Woodward Ave. #1115 Bloomfield Hills, MI 48302

Section 3. ALLEGATIONS

Sections of Michigan Campaign Finance Act (MCFA) alleged to be violated: MCL 169.221(2) and (3), MCL 169.224(1) and MCL 750.423 of the Michigan Penal Code.

#### STATEMENT OF FACTS

1. "Committee" is defined in Sec. 3(4) of the MCFA, MCL 169.203(4), as a:

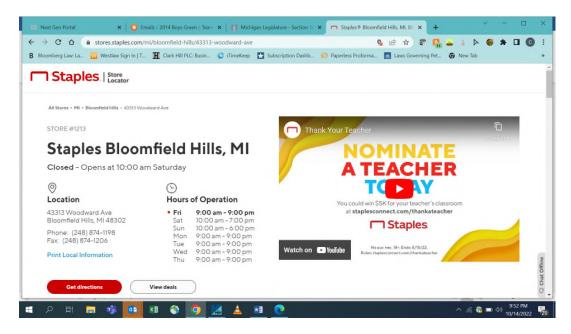
who received contributions or makes expenditures for the purpose of influencing or attempting to influence the action of voters for or against the nomination or election of a candidate, the qualification, passage or defeat of a ballot question or the qualification of a new political party, if contributions received total \$500.00 or more in a calendar year or expenditures total \$500.00 or more in a calendar year....An individual, other than a candidate, does not constitute a committee. A person, other than a committee registered under this act, making an expenditure to a ballot question committee or an independent expenditure committee, shall not, for that reason, be considered a committee or be required to file a report for the purposes of this act unless the person solicits or receives contributions for the purpose of making an expenditure to that ballot question committee or independent expenditure committee.



- 2. "Person" is defined in Sec. 11(2) of the MCFA, MCL 169.211(2) as:
- a business, individual, proprietorship, limited liability company, firm, partnership, joint venture, syndicate, business trust, labor organization, company, corporation, association, committee, or any other organization or group of persons acting jointly.
- 3. Section 24(3) and (4) of the MCFA, MCL 169.221, sets forth mandatory requirements on individuals who may serve as a Treasurer for a ballot question committee:
  - (3) A committee other than a candidate committee must have a treasurer who is a qualified elector of this state if the committee conducts business through an office or other facility located in this state.
  - (4) If a committee is not required to have as its treasurer an individual who is a qualified elector of this state, the committee may have as its treasurer an individual who is a resident of another state. A committee with a nonresident treasurer shall file, with its statement of organization, an irrevocable written stipulation, signed by the treasurer, agreeing that legal process affecting the committee, served on the secretary of state or an agent designated by the secretary of state, has the same effect as if personally **served on the committee.** This appointment remains in force as long as any liability of the committee remains outstanding within this state.
- 4. Section 24(1) of the MCFA, MCL 169.224(1), requires a committee to file a statement of organization within 10 days of its formation. Failure to file a report in compliance with Section 24(1) is "guilty of a misdemeanor punishable by a fine of not more than \$1,000.00."
- 5. Protect MI Voter ID filed its original Statement of Organization ("S of O") to form a ballot question committee on September 8, 2022 with the Bureau of Elections. (Ex. 1). The S of O form listed Dustin McIntyre as Treasurer,

2D488C5CC019E

- with an address of 43313 Woodward Ave. #1115, Bloomfield [Hills], MI 48302.
- 6. On the same date, September 8, 2022, Protect MI Voter ID filed an amended S of O. (Ex. 2). The amended S of O form again listed Dustin McIntyre as Treasurer, with an address of 43313 Woodward Ave. #1115, Bloomfield [Hills], MI 48302.
- 7. On September 22, 2022, Protect MI Voter ID filed a second amended S of O. (Ex. 3). The second amended S of O form changed the name of the Treasurer to Charlie Kolean, but left the address as 43313 Woodward Ave. #1115, Bloomfield [Hills], MI 48302.
- 8. On both the Original and both Amended S of O forms, the address listed for its treasurer is a business address for a Staples Store:



9. Staples provides a service to customers called iPostal1. According to the Staples website, "Your postal mail or parcels from any carrier can be received, forwarded, scanned, recycled, shredded, or picked up at your local store without the sender knowing it is a Staples address." (Ex. 4). This is

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not a street address as required on a S of O, but rather the equivalent to a PO Box.

- Upon information and belief, the current Treasurer for Protect MI Voter ID, Charlie Koleon is a resident at The Jordan by Windsor Apartment Complex, 2355 Thomas Avenue, Apt. 1711, Dallas, TX in Dallas County. Based on publicly available records, Mr. Koleon the Managing Member & Chief Compliance Officer at Strategic Financial Management, LLC in Dallas, Texas (his own company), and the Treasurer of the Dallas Young Republicans Board. (Ex. 5). The offices of Strategic Political Management and Strategic Financial Management are listed at Mr. Koleon's residential address in Texas.
- 11. While in its Original S of O and Second Amended S of O, Protect MI Voter ID checked "Out of State Committee Treasurer Irrevocable Written Stipulation," Protect MI Voter ID is not eligible to select an out-of-state treasurer because it indicates that it is operating its committee out of the Staples store in Bloomfield Hills. Stated differently, if Protect MI Voter ID is using a Michigan street address for its committee it is required to have a qualified Michigan voter as its treasurer and a primary depository located in this state pursuant to MCL 169.211(3) and (6).
- 12. By signing each S of O, Protect MI Voter ID, McIntyre, and now Koleon certified that:

I/We certify that all reasonable diligence was used in the preparation of the above statement and that the contents are true, accurate and complete to the best of my/our knowledge or belief. If filing electronically, we further agree that; the signatures below shall serve as the signatures that verify the accuracy and completeness of each statement filed

4D488C5CC019E

electronically by the committee. I/We certify that all reasonable diligence will be used in the preparation of each statement electronically filed by this committee and that the, contents of each statement will be true, accurate and complete to the best of my/our knowledge or belief.

- 13. On September 8, 2022, McIntyre submitted an Original and Amended S of O falsely stating that his street address was 43313 Woodward Ave. #1115, Bloomfield [Hills], MI 48302.
- 14. On September 22, 2022, Koleon submitted an Amended S of O falsely stating that his street address was 43313 Woodward Ave. #1115, Bloomfield [Hills], MI 48302.
- 15. MCL 169.221(13) states that "A person that violates this section is subject to a civil fine of not more than \$1,000.00."
- 16. MCL 750.423 provides that "a person who willfully makes a false declaration in a record that is signed by the person and given under penalty of perjury" is guilty of perjury, which is a felony punishable by imprisonment for not more than 15 years.

### SUMMARY OF ALLEGED VIOLATIONS

- 17. Based on these facts and the applicable law:
  - (a) Protect MI Voter ID does not have a valid street address for its committee and its Treasurer as required by the Michigan Campaign Finance Act in violation of MCL 169.221.
  - (b) Protect MI Voter ID, McIntyre and Koleon have made false statements and submitted fraudulent documents to the Bureau of Elections in violation of the Michigan Campaign Finance Act, MCL 169.221(13), and committed perjury in violation of MCL 750.423.

# Section 4. CERTIFICATION

18. I certify 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.

Christina Marie Schlitt Samed on 2022/10/21 09:43:10-7:00	10/31/2022
Christina Schlitt	[Date]
Notary: Cynthia Birl	Cynthia L. Birl Commission # 12073837 Notary Public STATE OF TEXAS My Comm Exp. Aug 31, 2024
	Notary Sturry 2022/10/31 10:43-10 PST  Notarial act performed by audio-visual communication





# PMIVoter\_ID\_Complaint\_No\_2269059365.2.pdf

DocVerify ID: EFDE67D3-96BE-4F45-A6C0-D488C5CC019E

Created: October 31, 2022 08:38:28 -7:00

Pages: 6

Remote Notary: Yes / State: TX

This document is a DocVerify VeriVaulted protected version of the document named above. It was created by a notary or on the behalf of a notary, and it is also a DocVerify E-Sign document, which means this document was created for the purposes of Electronic Signatures and/or Electronic Notary. Tampered or altered documents can be easily verified and validated with the DocVerify veriCheck system. This remote online notarization involved the use of communication technology.

Go to www.docverify.com at any time to verify or validate the authenticity and integrity of this or any other DocVerify VeriVaulted document.

#### E-Signature Summary

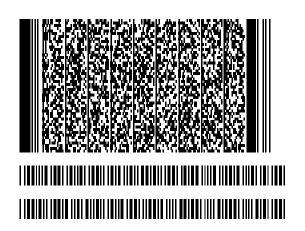
# E-Signature 1: Christina Marie Schlitt (CMS)

October 31, 2022 09:43:10 -7:00 [D8BA20A832EB] [174.211.40.52] bcschlitt@aol.com (Principal)

#### E-Signature Notary: Cynthia Birl (CB)

October 31, 2022 09:43:10 -7:00 [AE5AD1E0C4C4] [4.1.138.195] cbirl@clarkhill.com

I, Cynthia Birl, did witness the participants named above electronically sign this document.



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# **EXHIBITS TO**

League of Women Voters-Michigan Campaign Finance Complaint (October 31, 2022)

# ALLEGED VIOLATOR

Protect MI Voter ID 43313 Woodward Ave. #1115 Bloomfield Hills, MI 48302

# EXHIBIT 1 LWV-MI v PMV-ID 10/31/22 - Complaint

531159

# STATEMENT OF ORGANIZATION FORM FOR BALLOT QUESTION COMMITTEES

Print, sign, and mail a copy of this Statement of Organization to the Bureau of Elections to complete this request. All information disclosed on this form will be available to the public.

		·	
Committee ID:	Type of Filing: original	Date Submitted: 09/08/2022	Date Committee Formed: 09/08/2022
List the specific ballot propo	sal(s) involved usin	g the official ballot designation	n if available and mark support or oppose
asappropriate.		g g	and an amount and mark support of oppose
SECURE MI VOTE		Support	
Ballot Proposal District: Sta	tewide		
Full Name of Committee (mus	st include Candidate's first and	last name)	
PROTECT MI VOTER ID			
Acronym Or Abreviation			
		Out of State Committee	e Treasurer Irrevocable Written
		Stipulation.	e iteasulei hievocable willigh
Primary Email Contact	· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·	<del></del>
	FO@FECCOMPLIANCE	ROUP.COM	
Committee Street Address -	No PO Boxes		iling Address - May be PO Box
43313 WOODWARD AVE #1155		43313 WOODWARI	
BLOOMFIELD 48302	MI	BLOOMFIELD	MI
		48302	8045910050
Treasurer Full Name MCINTYRE	DUSTIN	:	
Treasurer Business Address		Treasurer Mai	Address
		43313 WOODWARI	
	MI	BLOOMFIELD	`MI
		48302	8045910050
Designated Record Keeper I	ull Name	Designated Rec	ord Keeper Address
			MI
Official Depository		Secondary Dep	ository
CHAIN BRIDGE BANK		,	,
1445-A LAUGHLIN AVE		•	
MCLEAN 22101	VA		
☑ Electronic Filing		<del></del>	
Reporting Waiver		Yes	☑ No
Verification:			
I/We certify that all reasonable	e diligence was used	in the preparation of the above	statement and that the contents
			electronically, we further agree that the
			eness of each statement filed electronically by the
			n of each statement electronically filed by this
			ete to the best of my/our knowledge or belief.
(Sign Name and Date)		we me min with which	are to me organizerity, our montones of politic
Treasurer:	Date:	Designated Record Keeper	Date:
Win	9/8/71	Popularion receir reche	Dato.
CX_VIVA AACTIV	110100		

Please email, fax, mail, or hand deliver a signed copy of the Statement of Organization using one of the following methods:

Email: Disclosure@Michigan.gov

Fax: 517-335-3235

First Class, Certified, Registered and Priority Mail: Michigan Department of State Bureau of Elections P.O. Box 20126

Hand Delivered and Overnight Delivery Service: Bureau of Elections 430 West Allegan Street

1st Floor, Richard H. Austin Building

Lansing, MI 48918

Authority granted under Act 388 of 1976, as amended

eSofO-ID: 7831

Lansing, MI 48901-0726

# **EXHIBIT 2** LWV-MI v PMV-ID 10/31/22 - Complaint

Primary Email Address: INFO@FECCOMPLIANCEGROUP.COM

**Primary Contact: Treasurer** 

Comm. ID#: 521014

Type of Filing: Amendment

Date Submitted:

9/8/2022

Requested Date Formed:

9/8/2022 Acronym:

Comm. Type: BAL

Committee Legal Name: PROTECT MI VOTER ID

Sponsor Type:

Sponsor:

Electronic Filing?: Y

Requested Waiver?: N

Committee Mail Address:

Committee Street Address:

43313 WOODWARD AVE #1155 BLOOMFIELD MI 4830243313 WOODWARD AVE #1155 BLOOMFIELD

MI 48302-

Comm. Phone: (804) 591-0050 Email:

Treasurer Name - Last:

First Name:

Middle Name:

Phone: (804) 591-0050

OOS? Y

MCINTYRE

DUSTIN

Email:

Treasurer Mail Address:

43313 WOODWARD AVE #1155

BLOOMFIELD

MI 48302-

531245

Treasurer Business Address:

Record Keeper Name - Last: First:

Middle:

Ι

Record Keeper Address:

Phone:

Phone:

Email:

Official Depository:

CHAIN BRIDGE BANK

1445-A LAUGHLIN AVE

MCLEAN

VA 22101-

Candidate Name - Last:

First Name:

Middle Name:

Party:

County of Residence:

Public Funding?:

Secondary Depository:

Office Sought:

District Sought:

Support/Oppose:

Ballot Issue:

BQ continued or State/Local:

Oppose

PROMOTE THE VOTE

PP Qualifying?: PP County: PP District:

SSF?:

# Michigan.gov

The Office of

EXHIBIT 3 LWV-MI v PMV-ID 10/31/22 - Complaint

# Secretary of State Jocelyn Benson

SOS / Elections

# Michigan Committee Statement of Organization

The documents sent and received listing for this committee is at the bottom of the screen.

Jump to the documents on file

Committee ID#	
521014	
Type of Filing	
Original	
Full name of committee	
PROTECT MI VOTER ID	
Committee Type	
Ballot Question	
Date Committee Was Formed	
09/08/2022	
Committee Phone Number	
(804) 591-0050	

#### **Committee Mail Address**

43313 WOODWARD AVE #1155 BLOOMFIELD, MI 48302

### **Committee Street Address**

43313 WOODWARD AVE #1155 BLOOMFIELD, MI 48302

#### **Treasurer**

CHARLIE KOLEAN 43313 WOODWARD AVE #1155 BLOOMFIELD, MI 48302 (804) 591-0050

# **Designated Record Keeper**

# **Reporting Waiver**

No

# Names and addresses of depositories or intended depositories of committee funds

# **Official Depository**

CHAIN BRIDGE BANK 1445-A LAUGHLIN AVE MCLEAN, VA 22101

# **Secondary Depository**

# **Documents on File**

Click on a document to access data and images for this committee.

N/A = Not applicable to this document type.

\* Fee has an outstanding balance.

Statement Year 2022  Document Year LATE CONTRIBUTION REPORT(e)  Document Covers N/A  Statement Due Not Available Sent/Received 10/27/2022  Doc Seq# 535688  Document Year 2022  Document Year LATE CONTRIBUTION REPORT(e)  Document Covers N/A  Statement Due Not Available  Sent/Received 10/26/2022  Doc Seq# 535512	
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Document Year	#3

<b>Document Covers</b> N/A	
Statement Due N/A	
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10/14/2022	
<b>Doc Seq#</b> 532148	
	Document #4
Statement Year	
<b>Document Year</b> AMENDED S of O - INFO(e)	
<b>Document Covers</b> N/A	
Statement Due N/A	
Sent/Received 09/22/2022	
<b>Doc Seq#</b> 532144	
532144	Document #5
Statement Year	Document #3
<b>Document Year</b> AMENDED S of O - INFO(e)	
<b>Document Covers</b> N/A	
Statement Due N/A	
Sent/Received 09/08/2022	

<b>Doc Seq#</b> 531245		
331243		
	Document #6	
Statement Year		
Document Year		
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Document Covers		
N/A		
Statement Due		
N/A		
Sent/Received		
09/08/2022		
Doc Seq#		
531159		



Michigan Home Michigan SOS

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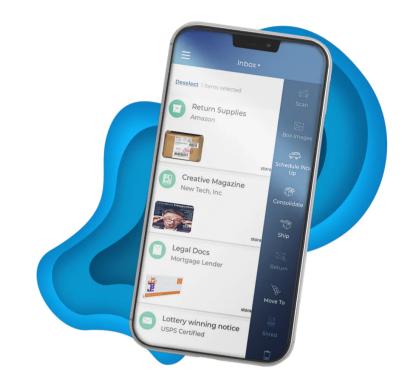


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(65) Charlie Kolean | LinkedIn

**EXHIBIT 5a** LWV-MI v PMV-ID 10/31/22 - Complaint















# Charlie Kolean · 2nd

President at Strategic Political Management

- Strategic Political Management
- Michigan State University

Dallas, Texas, United States · Contact info

500+ connections



1 mutual connection: Wayne Brouwer





More

# **Activity**

1,726 followers

Charlie Kolean posted this • 1d

Based on recent polling the GOP is likely to pick up a number of highly contested seats.

...show more



1 repost

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An ad recently produced by Strategic Political Management. Prop 2 - if passed would outlaw the photo ID requirement to vote! Vote NO on Prop 2!













# **Experience**



# **President**

Strategic Political Management · Full-time

Mar 2021 - Present · 1 yr 8 mos



# **Internal Wholesaler**

Westwood Holdings Group, Inc.

Jul 2019 - Apr 2022 · 2 yrs 10 mos

Dallas/Fort Worth Area



# **Internal Wholesaler**

Fidelity Investments

Jul 2017 - Jul 2019 · 2 yrs 1 mo

# **Education**



# Michigan State University

Bachelor of Arts - BA, Economics

2013 - 2017

# **Skills**

Series 65

**FINRA** 

series 7

Show all 6 skills →

# **Interests**

Influencers

Companies



Jon Steinberg in · 3rd

Founder of Cheddar, former President/COO of BuzzFeed, former President News and Advertising at Altice USA











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\$1 per week

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# People also viewed



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Vice President, Mutual Fund & Managed Account Sales



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# **Eddie Feintech**

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Chief Executive Officer at Purely Prepared Brands, Inc.





# Kevin G.

• 3rd

Political Consultant





### **Thom Ammirato**

• 3rd

owner at The Write Associates





### elle sokoloff

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--

- Connect











# People you may know



Lauren Parker

Attorney at Varnum LLP

Connect



**Nicolette Polly** 

Juris Doctor Candidate at St. Thomas University

Connect



M. Andrew Sperber

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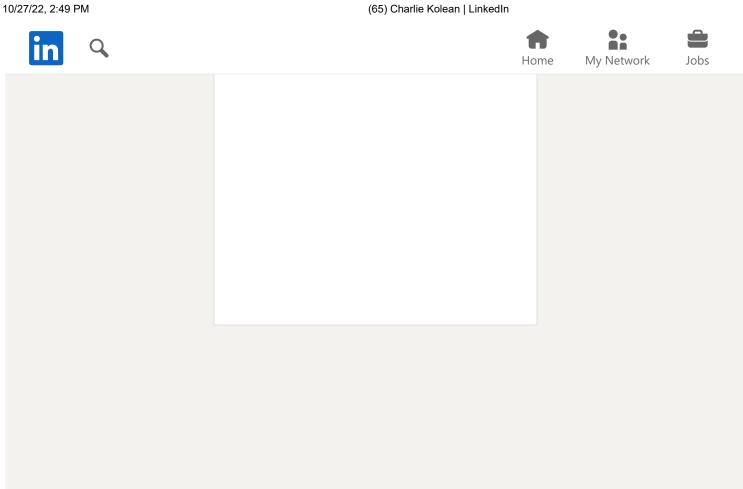
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Fair and Effective Interviewing for Diversity and Inclusion



# EXHIBIT 5b LWV-MI v PMV-ID - 10/31/22 - Complaint

This brochure supplement provides information about Charles John Kolean that supplements the Strategic Financial Management, LLC brochure. You should have received a copy of that brochure. Please contact Charles John Kolean if you did not receive Strategic Financial Management, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Charles John Kolean is also available on the SEC's website at www.adviserinfo.sec.gov.

# Strategic Financial Management, LLC

Form ADV Part 2B - Individual Disclosure Brochure

for

# Charles John Kolean

Personal CRD Number: 6440714 Investment Adviser Representative

> Strategic Financial Management, LLC 2355 Thomas Ave Apt 1711 Dallas, TX 75201-2352 (616) 283-4554 charles.kolean@gmail.com

> > UPDATED: 06/30/2022

# Item 2: Educational Background and Business Experience

Name: Charles John Kolean Born: 1995

**Educational Background and Professional Designations:** 

# **Education:**

Bachelors of arts Economics, Michigan State University - 2017

# **Business Background:**

03/2022 - Present Managing Member & Chief Compliance Officer

Strategic Financial Management, LLC

08/2019 – 04/2022 Registered Representative

Foreside Fund Services, LLC

03/2012 - 04/2022 Internal Wholesaler

Westwood Holding Group

07/2017 - 07/2019 Internal Wholesaler

Fidelity Investments

# **Item 3: Disciplinary Information**

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

# **Item 4: Other Business Activities**

Charles John Kolean is the owner of Strategic Political Management LLC, a political consulting firm.

# **Item 5: Additional Compensation**

Charles John Kolean does not receive any economic benefit from any person, company, or organization, other than Strategic Financial Management, LLC in exchange for providing clients advisory services through Strategic Financial Management, LLC.

# **Item 6: Supervision**

As the Chief Compliance Officer of Strategic Financial Management, LLC, Charles John Kolean supervises all activities of the firm. Charles John Kolean's contact information is on the cover page of this disclosure document. Charles John Kolean adheres to applicable regulatory requirements, together with all policies and procedures outlined in the firm's code of ethics and compliance manual.

# Item 7: Requirements For State Registered Advisers

This disclosure is required by state securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.

- A. Charles John Kolean has NOT been involved in any of the events listed below.
  - 1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
  - 2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
- B. Charles John Kolean has NOT been the subject of a bankruptcy.

# **EXHIBIT 5c** LWV-MI v PMV-ID - 10/31/22 - Complaint

Possible People Information	2
Person Overview	2
Date of Birth Summary	2
SSN Summary	2
Name Variations	2
Addresses	2
Political Donors	3
Phone Numbers	3
Possible Asset Information	3
Vehicle Registrations	3
Possible Business & Employment	3
Corporate Records & Business Registrations	3
DMI	4
Full-Text Documents	4
All Full-Text Documents	4
Possible Relatives & Household Members	24
Household Records	24
Possible Named Parties	25
People Associations	25
Business Associations	25
No Documents Found	25
No Documents Were Found In These Sources	25
Permissible Uses and FCRA Disclaimer	26
Permissible Uses	26

## **Possible People Information**

#### **Person Overview**

#### CHARLES J KOLEAN

2355 THOMAS AVE APT 1711

DALLAS, TX 75201-5423 | DALLAS County

## **Phone Number(s):**

616-392-4677

616-393-0398

SSN:

363-19-XXXX - issued in MI in 1995

DOB:

01/XX/1995 (Age: 27)



## **Date of Birth Summary**

Date of Birth	Source
01/XX/1995 (Age: 27)	People Household

## **SSN Summary**

SSN	Source
363-19-XXXX - issued in MI in 1995	

#### **Name Variations**

Name	Source
MR CHARLES KOLEAN	New Movers   People Find   People Household
	#1 People Household #2

#### Addresses

## Address

## 2355 THOMAS AVE APT 1711, DALLAS, TX 75201-5423 | DALLAS County

Reported 01/01/2021 - 09/01/2022

By Motor Vehicle 09/01/2022 - 09/01/2022 Motor Vehicle
By New Movers 11/16/2021 - 11/16/2021 New Movers
By People Household 01/01/2021 - 08/31/2021 People Household

## 96 BAY CIRCLE DR, HOLLAND, MI 49424-6608 | OTTAWA County

Reported 01/01/1992 - 09/30/2021

By People Household 01/01/1992 - 09/30/2021 People Household

By People Find 10/28/2014 - 10/28/2014 People Find #1 People Find #2

By Motor Vehicle Motor Vehicle

## 2805 ALLEN ST APT 319, DALLAS, TX 75204-1372 | DALLAS County

Reported 01/01/2020 - 10/31/2020

By People Household 01/01/2020 - 10/31/2020 People Household
By Motor Vehicle 09/01/2020 - 09/01/2020 Motor Vehicle

## **Political Donors**

<b>Last Party Contributed To</b>	<b>Date of Last Contribution</b>	<b>Confidence Score</b>	View Full Text
	04/19/2017	97%	Full-Text

#### **Phone Numbers**

Phone	Source
616-392-4677	People Find #1 People Find #2 People Household
616-393-0398	People Find People Household

## **Possible Asset Information**

## **Vehicle Registrations**

Year	Make	Model	<b>Registration Date</b>	<b>Confidence Score</b>	View Full Text
Current Motor Vehicles					
2014	BUICK	REGAL	09/28/2017	99%	Full-Text
Historical Motor Vehicles					
2014	BUICK	REGAL	06/08/2017	99%	Full-Text

## **Possible Business & Employment**

## **Corporate Records & Business Registrations**

<b>Business Name</b>	<b>Business Address</b>	Confidence Score	View Full Text
MICHIGAN FEDERATION	10696 76TH STREET	97%	Full-Text
OF COLLEGE	SOUTH HAVEN, MI 49090,		
REPUBLICANS	USA		

<b>Business Name</b>	<b>Business Address</b>	<b>Confidence Score</b>	View Full Text
STRATEGIC POLITICAL	2355 THOMAS AVE	99%	Full-Text
MANAGEMENT, LLC	DALLAS, TX 75201, USA		
MACATAWA		99%	Full-Text
STRATEGIES, L.L.C.			
STRATEGIC FINANCIAL	2355 THOMAS AVE	99%	Full-Text
MANAGEMENT, LLC	APT 1711 DALLAS, TX		
	75201-5423, USA		

#### **DMI**

<b>Business Name</b>	<b>Business Address</b>	Confidence Score	View Full Text
STRATEGIC POLITICAL	2805 ALLEN ST APT 319	99%	Full-Text
MANAGEMENT, LLC	DALLAS, TX 75204-1372		
STRATEGIC FINANCIAL	2355 THOMAS AVE	99%	Full-Text
MANAGEMENT, LLC	APT 1711 DALLAS, TX		
	75201-5423		

## **Full-Text Documents**

**All Full-Text Documents** 

## **Political Donors (1)**

To Summary

## **Political Donor Record**

## **Source Information**

## **Donation Information**

Date Acquired:	02/08/2018	First Contribution Date:	05/05/2014
Database Last Updated:	05/22/2018	Amount:	\$40.00
<b>Update Frequency:</b>	EVERY OTHER YEAR	<b>Last Contribution Date:</b>	04/19/2017
<b>Current Date:</b>	10/27/2022	Amount:	\$25.00
		Candidate/Committee/	MIPAC
		PAC:	

## Name and Personal Information

Name:	CHARLIE KOLEAN	Cantuibutian Tatala	
Address:	96 BAY CIRCLE DR	Contribution Totals	
		Total:	\$190.00

HOLLAND, MI
49424-6608

**End of Document** 

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## **New Movers Records (1)**

To Summary

#### **New Movers Record**

## **Source Information**

## **Household Information**

Information Current	10/15/2022	Address:	2355 THOMAS AVE APT
Through:			1711
Database Last Updated:	10/12/2022		DALLAS, TX 75201-5423
<b>Update Frequency:</b>	MONTHLY	County:	DALLAS
<b>Current Date:</b>	10/27/2022	Residence Type:	MULTI-FAMILY
Source:	Data by Data Axle,		DWELLING
	Copyright © 2022, All	Date:	11/16/2021
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## **Head of Household Information**

Name:	CHARLES KOLEAN
Age Range:	35-39

**End of Document** 

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## People Find Records (2)

To Summary

## **People Finder - Historic Tracker Record**

## **Source Information**

## **Last Known Address Information**

Information Current	09/30/2022	<b>Current Address:</b>	96 BAY CIRCLE DR
Through:			HOLLAND, MI
Database Last Updated:	10/04/2022		49424-6608
<b>Update Frequency:</b>	MONTHLY	Phone Number 1:	616-393-0398
<b>Current Date:</b>	10/27/2022	Phone Number 2:	616-392-4677
Source:	TRANS UNION	Address First Reported:	10/28/2014

#### **Individual Information**

Name:	KOLEAN, CHARLES J
Also Known As:	KOLEAN, CHARLES
On File Since:	10/28/2014

**End of Document** 

To Summary

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## People Finder - Historic Tracker Record

## **Source Information**

## **Last Known Address Information**

Information Current	09/30/2022	<b>Current Address:</b>	96 BAY CIRCLE DR
Through:			HOLLAND, MI
<b>Database Last Updated:</b>	10/04/2022		49424-6608
<b>Update Frequency:</b>	MONTHLY	Phone Number 1:	616-392-4677
<b>Current Date:</b>	10/27/2022	Address First Reported:	10/28/2014
Source:	TRANS UNION		

## **Individual Information**

Name:	KOLEAN, CHARLES J
On File Since:	10/28/2014

**End of Document** 

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## **Vehicle Registrations (2)**

To Summary

#### **Motor Vehicle Record**

## **Source Information**

Coverage Begin Date:	01/01/2001
Information Current Through:	10/19/2022
Database Last Updated:	10/26/2022
Update Frequency:	2X MONTHLY
Current Date:	10/27/2022
Source:	SECRETARY OF STATE, DRIVER & VEHICLE

## **Vehicle Information**

VIN:	2G4GK5EX7E9282531
Vehicle Type:	PASSENGER CAR
Model Year:	2014
Make:	BUICK
Body Style:	SEDAN 4D 5P
Model/Series:	REGAL BASE
Primary Color:	WHITE

## **Registration Information**

License Plate Number:	DSG3952
Issuing State:	MI
Plate Type:	PRIVATE
Previous Plate Number:	1LEC51
Previous Plate State:	MI
Registration Renewal Date:	06/08/2017
<b>Expiration Date:</b>	01/16/2018
Registrant(s) Since:	06/08/2017
Name:	DANIEL JOHN KOLEAN
Interest:	REGISTRANT
Mailing Address:	96 BAY CIRCLE DR
	HOLLAND, MI 49424-6608
County:	OTTAWA
License Plate Number:	1LEC51
Issuing State:	MI
Plate Type:	PRIVATE
Previous Plate Number:	1LEC51
Previous Plate State:	MI
Registration Renewal Date:	02/02/2017
<b>Expiration Date:</b>	03/01/2018
Registrant(s) Since:	04/16/2014
Interest:	REGISTRANT
Registration Renewal Date:	02/02/2017
<b>Expiration Date:</b>	03/01/2018
Registrant(s) Since:	04/16/2014
Name:	IMELDA MAY KOLTON
Interest:	LESSEE
Mailing Address:	4053 E 50TH ST

	MOUNT MORRIS, MI 48458-9436
County:	GENESEE

## **Title Information:**

Original Title Date:	06/09/2017
Title Number:	255F1590412
Name:	DANIEL JOHN KOLEAN
Interest:	OWNER
Title Transaction Date:	06/09/2017
Mailing Address:	96 BAY CIRCLE DR
	HOLLAND, MI 49424-6608
County:	OTTAWA
Name:	CHARLES J. KOLEAN
Interest:	OWNER
Title Transaction Date:	06/09/2017
Mailing Address:	96 BAY CIRCLE DR
	HOLLAND, MI 49424-6608
County:	OTTAWA

## **Historical DMV Record 1**

Registration Renewal Date:	02/02/2016
Expiration Date:	03/01/2017
License Plate Number:	1LEC51
Issuing State:	MI
Plate Type:	PRIVATE
Previous Plate Number:	1LEC51
Previous Plate State:	MI
Interest:	REGISTRANT
Registration Renewal Date:	02/02/2016
Expiration Date:	03/01/2017
Name:	IMELDA MAY KOLTON
Interest:	LESSEE
Mailing Address:	4053 E 50TH ST
	MOUNT MORRIS, MI 48458-9436
County:	GENESEE

Registration Renewal Date:	02/05/2015
<b>Expiration Date:</b>	03/01/2016

License Plate Number:	1LEC51
Issuing State:	MI
Plate Type:	PRIVATE
Previous Plate Number:	1LEC51
Previous Plate State:	MI
Interest:	REGISTRANT
Registration Renewal Date:	02/05/2015
<b>Expiration Date:</b>	03/01/2016
Name:	IMELDA MAY KOLTON
Interest:	LESSEE
Mailing Address:	4053 E 50TH ST
	MOUNT MORRIS, MI 48458-9436
County:	GENESEE

Title Transfer Date:	04/17/2014
Name:	VAUL TRUST
Interest:	OWNER
Mailing Address:	UNKNOWN
Title Transfer Date:	04/17/2014
Name:	ALLOY FINANCIAL
Interest:	LIEN HOLDER
Mailing Address:	PO BOX 8118
	8118
	COCKEYSVILLE, MD 21030-8118
County:	BALTIMORE
Title Transfer Date:	04/17/2014
Name:	VAUL TRUST
Interest:	LESSOR
Mailing Address:	UNKNOWN
Registration Renewal Date:	04/16/2014
<b>Expiration Date:</b>	03/01/2015
License Plate Number:	1LEC51
Issuing State:	MI
Plate Type:	PRIVATE
Name:	IMELDA MAY KOLTON
Interest:	LESSEE
Mailing Address:	4053 E 50TH ST
	MOUNT MORRIS, MI 48458-9436

County:	GENESEE
Registration Renewal Date:	04/16/2014
<b>Expiration Date:</b>	03/01/2015
Interest:	REGISTRANT

**End of Document** 

To Summary

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#### **Motor Vehicle Record**

## **Source Information**

Coverage Begin Date:	01/01/2001
Information Current Through:	10/19/2022
Database Last Updated:	10/26/2022
<b>Update Frequency:</b>	2X MONTHLY
Current Date:	10/27/2022
Source:	DEPT. OF TRANSPORTATION, VEHICLE TITLES &
	REGISTRATION DIVISION

## **Vehicle Information**

VIN:	2G4GK5EX7E9282531
Vehicle Type:	PASSENGER CAR
Model Year:	2014
Make:	BUICK
Body Style:	SEDAN 4D 5P
Model/Series:	REGAL BASE
Primary Color:	WHITE

## **Registration Information**

License Plate Number:	JWW4572
Issuing State:	TX
Plate Type:	PRIVATE
Previous Plate Number:	JWW4572
Previous Plate State:	TX
Registration Renewal Date:	09/01/2022
Expiration Date:	08/31/2023
Registrant(s) Since:	09/28/2017
Name:	DANIEL JOHN KOLEAN
Interest:	REGISTRANT
Mailing Address:	2805 ALLEN ST APT 319

	DALLAS, TX 75204-1372
County:	DALLAS
Physical Address:	2355 THOMAS AVE 1711
	DALLAS, TX 75201-5423
County:	DALLAS
Registration Renewal Date:	09/01/2022
<b>Expiration Date:</b>	08/31/2023
Registrant(s) Since:	09/28/2017
Name:	CHARLES JOHN KOLEAN
Interest:	REGISTRANT
Mailing Address:	2355 THOMAS AVE APT 1711
	DALLAS, TX 75201-5423
County:	DALLAS
Physical Address:	2355 THOMAS AVE APT 1711
	DALLAS, TX 75201-5423
County:	DALLAS

Registration Renewal Date:	09/01/2021
Expiration Date:	08/31/2022
License Plate Number:	JWW4572
Issuing State:	TX
Plate Type:	PRIVATE
Previous Plate Number:	JWW4572
<b>Previous Plate State:</b>	TX
Name:	DANIEL JOHN KOLEAN
Interest:	REGISTRANT
Mailing Address:	2805 ALLEN ST
	DALLAS, TX 75204-1372
County:	DALLAS
Physical Address:	2355 THOMAS AVE
	DALLAS, TX 75201-5423
County:	DALLAS
Registration Renewal Date:	09/01/2021
Expiration Date:	08/31/2022
Name:	CHARLES JOHN KOLEAN
Interest:	REGISTRANT
Mailing Address:	2355 THOMAS AVE
	DALLAS, TX 75201-5423

County:	DALLAS
Physical Address:	2355 THOMAS AVE
	DALLAS, TX 75201-5423
County:	DALLAS

Registration Renewal Date:	09/01/2020
<b>Expiration Date:</b>	08/31/2021
License Plate Number:	JWW4572
Issuing State:	TX
Plate Type:	PRIVATE
Previous Plate Number:	JWW4572
Previous Plate State:	TX
Name:	CHARLES JOHN KOLEAN
Interest:	REGISTRANT
Mailing Address:	2805 ALLEN ST
	DALLAS, TX 75204-1372
County:	DALLAS
Registration Renewal Date:	09/01/2020
Expiration Date:	08/31/2021
Name:	DANIEL JOHN KOLEAN
Interest:	REGISTRANT
Mailing Address:	2805 ALLEN ST
	DALLAS, TX 75204-1372
County:	DALLAS

Registration Renewal Date:	09/01/2019
<b>Expiration Date:</b>	08/31/2020
License Plate Number:	JWW4572
<b>Issuing State:</b>	TX
Plate Type:	PRIVATE
<b>Previous Plate Number:</b>	JWW4572
Previous Plate State:	TX
Name:	DANIEL JOHN KOLEAN
Interest:	REGISTRANT
Mailing Address:	2805 ALLEN ST
	DALLAS, TX 75204-1372
County:	DALLAS

Registration Renewal Date:	09/01/2019
<b>Expiration Date:</b>	08/31/2020
Name:	CHARLES JOHN KOLEAN
Interest:	REGISTRANT
Mailing Address:	2805 ALLEN ST
	DALLAS, TX 75204-1372
County:	DALLAS

Registration Renewal Date:	09/01/2018
<b>Expiration Date:</b>	08/31/2019
License Plate Number:	JWW4572
Issuing State:	TX
Plate Type:	PRIVATE
<b>Previous Plate Number:</b>	JWW4572
<b>Previous Plate State:</b>	TX
Name:	CHARLES JOHN KOLEAN
Interest:	REGISTRANT
Mailing Address:	2805 ALLEN ST
	DALLAS, TX 75204-1372
County:	DALLAS
<b>Registration Renewal Date:</b>	09/01/2018
<b>Expiration Date:</b>	08/31/2019
Name:	DANIEL JOHN KOLEAN
Interest:	REGISTRANT
Mailing Address:	2805 ALLEN ST
	DALLAS, TX 75204-1372
County:	DALLAS

Title Transfer Date:	10/06/2017	
Name:	CHARLES JOHN KOLEAN	
Interest:	OWNER	
Mailing Address:	2805 ALLEN ST	
	DALLAS, TX 75204-1372	
County:	DALLAS	
Title Transfer Date:	10/06/2017	
Name:	DANIEL JOHN KOLEAN	
Interest:	OWNER	

Mailing Address:	2805 ALLEN ST
	DALLAS, TX 75204-1372
County:	DALLAS
Registration Renewal Date:	09/28/2017
Expiration Date:	08/31/2018
License Plate Number:	JWW4572
Issuing State:	TX
Plate Type:	PRIVATE
<b>Previous Plate Number:</b>	DSG3952
<b>Previous Plate State:</b>	MI
Name:	DANIEL JOHN KOLEAN
Interest:	REGISTRANT
Mailing Address:	2805 ALLEN ST
	DALLAS, TX 75204-1372
County:	DALLAS
<b>Registration Renewal Date:</b>	09/28/2017
<b>Expiration Date:</b>	08/31/2018
Name:	CHARLES JOHN KOLEAN
Interest:	REGISTRANT
Mailing Address:	2805 ALLEN ST
	DALLAS, TX 75204-1372
County:	DALLAS

**End of Document** 

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## **Corporate Records & Business Registrations (4)**

To Summary

## **Corporate Records & Business Registrations**

## **Source Information**

## **Registered Agent Information**

Information Current	10/13/2022	Name:	CHRISTOPHER KERBER
Through:		Address:	10696 76TH STREET
<b>Database Last Updated:</b>	10/13/2022		SOUTH HAVEN, MI 49090
<b>Update Frequency:</b>	WEEKLY		USA
<b>Current Date:</b>	10/27/2022		
Source:	MICHIGAN SECRETARY OF STATE	Amendment Information	n

THIS DATA IS FOR INFORMATION PURPOSES ONLY. CERTIFICATION CAN ONLY BE OBTAINED THROUGH THE MICHIGAN DEPARTMENT OF ENERGY, LABOR		Amendments:	08/25/2017 CHANGE OF AGENT AND/OR OFFICE PREV RO: 96 BAY CIRCLE
AND ECONOMIC GROWTH			DR HOLLAND MI 49424
Company Information	MICHIGAN FEDERATION		08/25/2017 CHANGE OF AGENT AND/OR OFFICE PREV RA: CHARLES KOLEAN
	OF COLLEGE		03/24/2016 CHANGE
	REPUBLICANS		OF AGENT AND/OR
Address:	10696 76TH STREET	-	OFFICE PREV RO: 3021
	SOUTH HAVEN, MI 49090		BEAUJARDIN DR. APT.
	USA		101 LANSING MI 48910
Filing Information			03/24/2016 CHANGE OF AGENT AND/OR OFFICE PREV RA: BRANDON ZANON
Original Filing Number:	71306V		03/24/2016 CHANGE
<b>Identification Number:</b>	800936904		OF AGENT AND/OR
Filing Date:	03/05/2013		OFFICE PREV MA:
Formed Under Act Number(s):	162-1982		3021 BEAUJARDIN DR.
State of Incorporation:	MICHIGAN	-	LANSING MI 48910
Country of Incorporation:	UNITED STATES		
Date Incorporated:	03/05/2013	Additional Detail Info	ormation
Duration:	PERPETUAL		
Status:	ACTIVE	Additional Details:	MOST RECENT ANNUAL
<b>Corporation Type:</b>	DOMESTIC NONPROFIT	The preceding public recor	REPORT: 2021 d data is for information purposes
	CORPORATION	only and is not the official	record. Certified copies can only
<b>Business Type:</b>	CORPORATION	be obtained from the offici	al source.
Where Filed:	DEPARTMENT OF	The public record items rep	ported above may have been paid,
	LABOR AND ECONOMIC	terminated, vacated or release	ased prior to today's date.
	GROWTH/CORPORATION		
	DIVISION		
	7150 HARRIS DRIVE P.O.	<b>Order Documents</b>	
	BOX 30054	Call Westlaw CourtExpress	s at 1-877-DOC-RETR
	LANSING, MI 48909	-	te manual retrieval of documents
		malata d to this an other most	ers. Additional charges apply.

**End of Document** 

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To Summary

## **Corporate Records & Business Registrations**

## **Source Information**

## **Registered Agent Information**

Information Current	10/26/2022	Name:	CHARLES JOHN KOLEAN	
Through:		Address:	2805 ALLEN ST, APT 319	
<b>Database Last Updated:</b>	10/27/2022		DALLAS, TX 75204	
<b>Update Frequency:</b>	DAILY		USA	
<b>Current Date:</b>	10/27/2022			
Source:	TEXAS SECRETARY OF			
	STATE	Name Information	n	
		Legal Name:	STRATEGIC POLITICAL	
			MANAGEMENT, LLC	
Company Information		Status:	IN USE	
Name:	STRATEGIC POLITICAL	Filing Date:	03/04/2021	
	MANAGEMENT, LLC			
Address:	2355 THOMAS AVE			
	DALLAS, TX 75201	Principal Information		
	USA	Name:	STRATEGIC POLITICAL	
			MANAGEMENT, LLC	
		Title:	MEMBER	
Filing Information		Address:	2355 THOMAS AVE # 1711	
Filing Number:	803954561		DALLAS, TX 75201	
Filing Date:	03/01/2021		USA	
State of Incorporation:	TEXAS			
Duration:	PERPETUAL			
Status:	IN EXISTENCE	Amendment Infor	rmation	
<b>Business Type:</b>	DOMESTIC LIMITED	Amendments:	08/12/2022 PUBLIC	
	LIABILITY COMPANY		INFORMATION REPORT	
	(LLC)		(PIR); DOCUMENT	
State Tax ID:	32078036194		NUMBER - 1169123090001	
Where Filed:	SECRETARY OF STATE		03/01/2021 CERTIFICATE	
	1019 BRAZOS ST		OF FORMATION;	
	AUSTIN, TX 78701		DOCUMENT NUMBER -	
			1031072420002	

The preceding public record data is for information purposes only and is not the official record. Certified copies can only be obtained from the official source.

The public record items reported above may have been paid, terminated, vacated or released prior to today's date.

## **Order Documents**

Call Westlaw CourtExpress at 1-877-DOC-RETR (1-877-362-7387) for on-site manual retrieval of documents related to this or other matters. Additional charges apply.

**End of Document**To Summary

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## **Corporate Records & Business Registrations**

## **Source Information**

## **Registered Agent Information**

Information Current	10/13/2022	Name:	CHARLES J KOLEAN				
Through:		Address:	96 BAY CIRCLE DR				
Database Last Updated:	10/13/2022		HOLLAND, MI 49424				
<b>Update Frequency:</b>	WEEKLY		USA				
<b>Current Date:</b>	10/27/2022						
Source:	MICHIGAN SECRETARY						
	OF STATE	Additional Detail Inf	Cormation				
THIS DATA IS FOR INFORMATION PURPOSES ONLY. CERTIFICATION CAN ONLY BE OBTAINED THROUGH THE MICHIGAN DEPARTMENT OF ENERGY, LABOR AND ECONOMIC GROWTH, CORPORATE DIVISION.		Additional Details:	MEMBERS				
		The preceding public record data is for information purposes only and is not the official record. Certified copies can only be obtained from the official source.					
						The public record items reported above may have been paid,	
						terminated, vacated or rel	eased prior to today's date.
Company Information							

#### **Company Information**

Name:	MACATAWA STRATEGIES, L.L.C.	Order Documents
Filing Information		Call Westlaw CourtExpress at 1-877-DOC-RETR (1-877-362-7387) for on-site manual retrieval of documents related to this or other matters. Additional charges apply.
Original Filing Number:	E6202T	
<b>Identification Number:</b>	801833813	

<b>T B</b> .	0.4/0.0/2.01.5
Filing Date:	04/09/2015
Formed Under Act	023-1993
Number(s):	
State of Incorporation:	MICHIGAN
<b>Country of Incorporation:</b>	UNITED STATES
<b>Duration:</b>	PERPETUAL
Status:	IN EXISTENCE BUT NOT
	IN GOOD STANDING
<b>Status Attained Date:</b>	02/18/2020
Corporation Type:	DOMESTIC LIMITED
	LIABILITY COMPANY
<b>Business Type:</b>	LIMITED LIABILITY
	COMPANY
Where Filed:	DEPARTMENT OF
	LABOR AND ECONOMIC
	GROWTH/CORPORATION
	DIVISION
	7150 HARRIS DRIVE P.O.
	BOX 30054
	LANSING, MI 48909

**End of Document** To Summary  $\ensuremath{\mathbb{C}}$  2022 Thomson Reuters. No claim to original U.S. Government Works.

## **Corporate Records & Business Registrations**

## **Source Information**

## **Registered Agent Information**

Information Current	10/26/2022	Name:	CHARLES JOHN KOLEAN
Through:		Address:	2355 THOMAS AVE # 1711
<b>Database Last Updated:</b>	10/27/2022		DALLAS, TX 75201
<b>Update Frequency:</b>	DAILY		USA
<b>Current Date:</b>	10/27/2022		
Source:	TEXAS SECRETARY OF STATE	Name Information	
		Legal Name:	STRATEGIC FINANCIAL MANAGEMENT, LLC
Company Information		Status:	IN USE
Name:	STRATEGIC FINANCIAL	Filing Date:	04/20/2022
	MANAGEMENT, LLC		

Address:	2355 THOMAS AVE APT 1711 DALLAS, TX 75201-5423	Principal Informa	tion
	USA	Name:	CHARLES JOHN KOLEAN
		Title:	MANAGING MEMBER
Filing Information		Address:	2355 THOMAS AVE APT 1711
Filing Number:	804526500		DALLAS, TX 75201
Filing Date:	04/18/2022		USA
State of Incorporation:	TEXAS		
Duration:	PERPETUAL		
Status:	IN EXISTENCE	Amendment Infor	emation
<b>Business Type:</b>	DOMESTIC LIMITED	Amendments:	04/18/2022 CERTIFICATE
	LIABILITY COMPANY		OF FORMATION;
	(LLC)		DOCUMENT NUMBER -
State Tax ID:	32084174310		1140450160002
Where Filed:	SECRETARY OF STATE	The preceding public record data is for information purpose only and is not the official record. Certified copies can only be obtained from the official source.	
	1019 BRAZOS ST		
	AUSTIN, TX 78701		
		-	ns reported above may have been paid, released prior to today's date.

## **Order Documents**

Call Westlaw CourtExpress at 1-877-DOC-RETR (1-877-362-7387) for on-site manual retrieval of documents related to this or other matters. Additional charges apply.

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## **DMI (2)**

To Summary



#### **D&B** Market Identifiers

## **Source Information**

## **Sales Information:**

D&B Completed Ana	olysis: 09/20/2	022	<b>Annual Sales Revision</b>	07/30/2022
Information Current	09/20/2	022	Date:	
Through:			Annual Sales (US):	\$58,050 -ESTIMATED
Database Last Updat	ed: 09/20/2	022	1-Yr-Ago:	\$ NOT AVAILABLE
<b>Update Frequency:</b>	MONTI	HLY	3-Yr-Ago:	\$ NOT AVAILABLE
Current Date:	10/27/2	022		
Source:	Copyrig	tht © 2022 by Dun &		
	Bradstre	eet, Inc.	<b>Employee Information</b>	
			<b>Employees Total:</b>	2
~ .	.•		1-Yr-Ago:	NOT AVAILABLE
Company Informa	tion		3-Yr-Ago:	NOT AVAILABLE
DUNS:	12-067-	3679	<b>Employees Here:</b>	2 -ESTIMATED
Name:	STRAT	EGIC POLITICAL		
	MANA	GEMENT, LLC		
Address:	2805 A	LLEN ST APT 319	Company History/Ope	rations/Relationships
	DALLAS, TX 75204-1372		Other Information	
County:	DALLA	AS	Other Information	
Year Started:	2021		This Company's Specifics:	
			DUNS:	12-067-3679
	.•		MSA Code:	1920
Executive(s) Infor	mation		MSA Name:	DALLAS, TX
1. E	xecutive Name:	CHARLES J	Business Is A:	SINGLE LOCATION
		KOLEAN		SMALL BUSINESS
E	executive Title:	MANAGING		CORPORATION
			Establishment Is:	US OWNED
		MEMBER		
		MEMBER	Latest Update to Record:	07/10/2022
		MEMBER		
Business Descripti	on:	MEMBER		
		MEMBER  GEMENT		07/10/2022
		GEMENT		07/10/2022
Line of Business:	MANA	GEMENT CES		07/10/2022
Business Descripti Line of Business: Industry Group:	MANA SERVIO SERVIO	GEMENT CES		
Line of Business:	MANA SERVIO SERVIO PROFE	GEMENT CES CES -		07/10/2022

	8741 0000 MANAGEMENT SERVICES, NSK	
End of Document To Summary	, ,	© 2022 Thomson Reuters. No claim to original U.S. Government Works.
		DS-B
		Decide with Confidence

			D&B Marko	et Identifiers	
Source Information	on			Sales Information:	
D&B Completed An	alysis: (	09/20/202	22	Annual Sales Revision	07/30/2022
Information Curren	-	09/20/202	22	Date:	
Through:				Annual Sales (US):	\$58,050 -ESTIMATED
Database Last Upda	ted: (	09/20/202	22	1-Yr-Ago:	\$ NOT AVAILABLE
<b>Update Frequency:</b>	1	MONTH	LY	3-Yr-Ago:	\$ NOT AVAILABLE
Current Date:	1	10/27/202	22		
Source:	(	Copyrigh	t © 2022 by Dun &		
	I	Bradstree	et, Inc.	Employee Information	
				<b>Employees Total:</b>	2
	_			1-Yr-Ago:	NOT AVAILABLE
Company Inform	ation			3-Yr-Ago:	NOT AVAILABLE
DUNS:	(	09-306-3	732	<b>Employees Here:</b>	2 -ESTIMATED
Name:	5	STRATE	GIC FINANCIAL		
	1	MANAG	EMENT, LLC		
Address:	2	2355 TH	OMAS AVE APT	Company History/Oper	ations/Relationships &
	1	1711		Oth on Inform of or	
		DALLA	S, TX 75201-5423	Other Information	
County:	I	DALLAS	8	This Company's Specifics:	
Year Started:	2	2022		DUNS:	09-306-3732
				MSA Code:	1920
	,•			MSA Name:	DALLAS, TX
Executive(s) Info	rmation			Business Is A:	SINGLE LOCATION
1.	Executive	Name:	CHARLES J		SMALL BUSINESS
			KOLEAN		CORPORATION
]	Executive	Title:	MANAGING	<b>Establishment Is:</b>	US OWNED
			MEMBER	<b>Latest Update to Record:</b>	05/03/2022

Business Description:	
Line of Business:	MANAGEMENT
	SERVICES
<b>Industry Group:</b>	SERVICES -
	PROFESSIONAL
Primary SIC:	8741 MANAGEMENT
	SERVICES, NSK
	8741 0000 MANAGEMENT
	SERVICES, NSK

**End of Document** 

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## **Household Records (3)**

To Summary

## **People Finder Household-Centric Record**

## **Source Information**

## **Household Information:**

Information Current	08/26/2022	Address:	2355 THOMAS AVE
Through:			APT 1711
Database Last Updated:	10/12/2022		DALLAS, TX 75201-5423
<b>Update Frequency:</b>	MONTHLY	County:	DALLAS
<b>Current Date:</b>	10/27/2022	Latitude/Longitude:	-96.801577/32.793231
Source:	Data by Data Axle,	Residence Type:	MULTI-FAMILY
	Copyright © 2022, All		DWELLING
	Rights Reserved.	Address First Reported:	2021

## **Head of Household Information**

Head of Household:	MR CHARLES KOLEAN
Gender:	MALE
Name/Address Confirmed:	08/2021
Marital Status:	SINGLE

**End of Document** 

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To Summary

## **People Finder Household-Centric Record**

#### **Source Information**

#### **Household Information:**

Information Current	08/26/2022	Address:	2805 ALLEN ST
Through:			APT 319
Database Last Updated:	10/12/2022		DALLAS, TX 75204-1372
<b>Update Frequency:</b>	MONTHLY	County:	DALLAS
<b>Current Date:</b>	10/27/2022	Latitude/Longitude:	-96.801339/32.800729
Source:	Data by Data Axle,	Residence Type:	MULTI-FAMILY
	Copyright © 2022, All		DWELLING
	Rights Reserved.	Address First Reported:	2020

## **Head of Household Information**

Head of Household:	MR CHARLES KOLEAN	
Gender:	MALE	
Name/Address Confirmed:	10/2020	
Marital Status:	SINGLE	

**End of Document** 

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To Summary

## **People Finder Household-Centric Record**

## **Source Information**

## **Household Information:**

Information Current	08/26/2022	Address:	96 BAY CIRCLE DR
Through:			HOLLAND, MI
Database Last Updated:	10/12/2022		49424-6608
<b>Update Frequency:</b>	MONTHLY	County:	OTTAWA
<b>Current Date:</b>	10/27/2022	Latitude/Longitude:	-86.154477/42.801255
Source:	Data by Data Axle,	Residence Type:	SINGLE FAMILY
	Copyright © 2022, All		DWELLING
	Rights Reserved.	Address First Reported:	1992
		Telephone:	616-392-4677

## **Head of Household Information**

Head of Household:	MR DANIEL J KOLEAN	
Gender:	MALE	

## Additional Individuals In This Household

Date of Birth:	04/XX/1960	Name:	MS SARAH K KOLEAN
Name/Address Confirmed:	10/2021		(Spouse)
Marital Status:	MARRIED	Gender:	FEMALE
		Date of Birth:	04/XX/1966
		Name/Address Confirmed:	09/2021
		Marital Status:	MARRIED
		Name:	MS EMILY M KOLEAN
		Gender:	FEMALE
		Date of Birth:	07/XX/1993
		Name/Address Confirmed:	09/2021
		Name:	MR CHARLES J KOLEAN
		Gender:	MALE
		Date of Birth:	/XX1995
		Name/Address Confirmed:	09/2021

**End of Document** 

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## Possible Relatives & Household Members

**Household Records** 

## 2355 THOMAS AVE APT 1711 DALLAS, TX 75201-5423 | Full-Text

Address First Reported:	2021	<b>Confidence Score:</b>	97
Name	Role	Date of Birth	Name/Address Confirmed:
MR CHARLES KOLEAN	Head of Household	N/A	08/2021

## 2805 ALLEN ST APT 319 DALLAS, TX 75204-1372 | Full-Text

Address First Reported:	2020	<b>Confidence Score:</b>	97
Name	Role	Date of Birth	Name/Address Confirmed:
MR CHARLES KOLEAN	Head of Household	N/A	10/2020

## 96 BAY CIRCLE DR HOLLAND, MI 49424-6608 Full-Text

Address First	1992	Phone:	616-392-4677	Confidence	99
Reported:				Score:	

Name	Role	Date of Birth	Name/Address Confirmed:
MR DANIEL J KOLEAN	Head of Household	04/XX/1960	10/2021
MS SARAH K KOLEAN	Spouse	04/XX/1966	09/2021
MS EMILY M KOLEAN	Other	07/XX/1993	09/2021
MR CHARLES J KOLEAN	Other	/XX1995	09/2021

## **Possible Named Parties**

## **People Associations**

1 copic Associations	
HEATH STUTLER	JANE L STUTLER
HEATHER D FORNER	DANIEL J KOLEAN
ANDREW M KAPANOWSKI	CHRISTOPHER P KERBER
SHERYL A VANSTEDUM	EMILY M KOLEAN
RENEE C WIDMAYER	EMILY J COLENBRANDER
JOHN KOLEAN	SARAH K KOLEAN
JEFFREY A STUTLER	GREGORY J ERICKSON
IMELDA M KOLTON	KATHLEEN K LESHNER
KOLEAN GEENEN	COURTNEY E THOMPSON
BRANDON M ZANON	HANNAH STUTLER

## **Business Associations**

GEENEN AND KOLEAN PC	MOUNTAIN SOUTH FINANCIAL GROUP LLC
KC LLC	

## **No Documents Found**

## **No Documents Were Found In These Sources**

Aircraft Records	Bankruptcy Records
BusFindUS	Conceal & Carry Weapons Permits
Death Records	Divorce Records
Email Address Records	Executive Bios
FBN/DBA	FEIN
Healthcare Licenses	Historical Address Records
Hunting & Fishing Licenses	Lawsuit Records
Liens & Judgments	Marriage Records
Professional Licenses	Real Property Pre-Foreclosure Records
Real Property Tax Assessor Records	Real Property Transactions
Stock	UCC Records

Unclaimed Assets	Voter Registrations
Watercraft Records	

## Permissible Uses and FCRA Disclaimer

#### **Permissible Uses**

DPPA - For use in connection with a civil, criminal, or arbitral legal proceeding or legal research.

GLB - NO PERMISSIBLE USE.

VOTERS - Use in connection with an election-related purpose.

Skip Tracing for Consumer Collections Declaration - Are you using this product for skip tracing related to consumer debt collection? - No

Thomson Reuters Legal is not a consumer reporting agency and none of its services or the data contained therein constitute a 'consumer report' as such term is defined in the Federal Fair Credit Reporting Act (FCRA), 15 U.S.C. sec. 1681 et seq. The data provided to you may not be used as a factor in consumer debt collection decisioning, establishing a consumer's eligibility for credit, insurance, employment, government benefits, or housing, or for any other purpose authorized under the FCRA. By accessing one of our services, you agree not to use the service or data for any purpose authorized under the FCRA or in relation to taking an adverse action relating to a consumer application.



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

#### EPARIMENT OF STA Lansing

December 16, 2022

Protect MI Voter ID 43313 Woodward Ave. #1115 Bloomfield Hills, MI 48302

Re: League of Women Voters-Michigan v. Protect MI Voter ID Campaign Finance Complaint No. 2022 – 10 – 166 – 221

Dear Protect MI Voter ID:

The Department of State (Department) has received a formal complaint filed against you by League of Women Voters-Michigan alleging that you violated the Michigan Campaign Finance Act (MCFA or Act). Specifically, the complaint alleges that the address that you indicated on your Statement of Organization (S of O), as a Staples store, is the equivalent of a P.O. Box, while the S of O states that the committee street address may not be a P.O. Box.

In the alternative, if your committee <u>is</u> "conduct[ing] business through an office or other facility located in this state" (i.e. the Staples store), the complaint alleges that you are required to have as your treasurer a qualified elector of Michigan and to have one account in a Michigan financial institution. The official depository indicated on your S of O is a bank in Virginia and, while the address indicated for the treasurer is the same Staples store, the complaint alleges that the treasurer is in fact a resident of Virginia.

A copy of the complaint is included with this notice.

Section 21 of the MCFA requires that a committee other than a candidate committee have a treasurer who is a qualified elector of Michigan if the committee conducts business through an office or other facility located in Michigan. MCL 169.221(3). If, however, the committee is <u>not</u> required to have a Michigan resident as its treasurer, the committee must file with its S of O an irrevocable written stipulation, signed by the treasurer, agreeing that legal process served on the Secretary of State on behalf of the committee has the same effect as if personally served on the committee. MCL 169.221(4). Additionally, a committee that is required to have a Michigan resident as its treasurer must have one account in a Michigan financial institution to serve as its official depository. MCL 169.221(6).

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. <u>It is important to understand that the Department is neither making this complaint nor accepting the allegations as true</u>. The investigation and resolution of this complaint is governed by section 15 of the Act and

Protect MI Voter ID Page 2

the corresponding administrative rules, R 169.51 *et seq*. An explanation of the process is included in the enclosed 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 League of Women Voters-Michigan, which 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: League of Women Voters-Michigan



## STATE OF MICHIGAN JOCELYN BENSON, SECRETARY OF STATE

## DEPARTMENT OF STATE Lansing

January 25, 2023

Protect MI Voter ID 43313 Woodward Ave. #1155 Bloomfield Hills, MI 48302

Re: League of Women Voters-Michigan v. Protect MI Voter ID Campaign Finance Complaint No. 2022 – 10 – 166 – 221

Dear Protect MI Voter ID:

The Department of State (Department) has received a formal complaint filed against you by League of Women Voters-Michigan alleging that you violated the Michigan Campaign Finance Act (MCFA or Act). Specifically, the complaint alleges that the address that you indicated on your Statement of Organization (S of O), as a Staples store, is the equivalent of a P.O. Box, while the S of O states that the committee street address may not be a P.O. Box.

In the alternative, if your committee <u>is</u> "conduct[ing] business through an office or other facility located in this state" (i.e. the Staples store), the complaint alleges that you are required to have as your treasurer a qualified elector of Michigan and to have one account in a Michigan financial institution. The official depository indicated on your S of O is a bank in Virginia and, while the address indicated for the treasurer is the same Staples store, the complaint alleges that the treasurer is in fact a resident of Virginia.

A copy of the complaint is included with this notice. The complaint includes the incorrect address for your committee and a December 16, 2022 notice of the complaint sent to that address was returned to the Department.

Section 21 of the MCFA requires that a committee other than a candidate committee have a treasurer who is a qualified elector of Michigan if the committee conducts business through an office or other facility located in Michigan. MCL 169.221(3). If, however, the committee is <u>not</u> required to have a Michigan resident as its treasurer, the committee must file with its S of O an irrevocable written stipulation, signed by the treasurer, agreeing that legal process served on the Secretary of State on behalf of the committee has the same effect as if personally served on the committee. MCL 169.221(4). Additionally, a committee that is required to have a Michigan resident as its treasurer must have one account in a Michigan financial institution to serve as its official depository. MCL 169.221(6).

Protect MI Voter ID Page 2

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. <u>It is important to understand that the Department is neither making this complaint nor accepting the allegations as true</u>. 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 enclosed 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 League of Women Voters-Michigan, which 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: League of Women Voters-Michigan



## STATE OF MICHIGAN JOCELYN BENSON, SECRETARY OF STATE

## DEPARTMENT OF STATE

LANSING

February 21, 2023

## SECOND NOTICE

Protect MI Voter ID 43313 Woodward Ave. #1155 Bloomfield Hills, MI 48302

Re: League of Women Voters-Michigan v. Protect MI Voter ID

Campaign Finance Complaint No. 2022-10-166-221

Dear Protect MI Voter ID:

The Department of State (Department) has received a formal complaint filed against you by League of Women Voters-Michigan alleging that you violated the Michigan Campaign Finance Act (MCFA or Act). Specifically, the complaint alleges that you indicated on your Statement of Organization (S of O), as a Staples store, is the equivalent of a P.O. Box, while the S of O states that the committee street address may not be a P.O. Box.

In the alternative, if your committee is "conduct[ing] business through an office or other facility located in this state" (i.e. the Staples store), the complaint alleges that you are required to have as your treasurer a qualified elector of Michigan and to have one account in a Michigan financial institution. The official depository indicated on your S of O is a bank in Virginia and, while the address indicated for the treasurer is the same Staples store, the complaint alleges that the treasurer is in fact a resident of Virginia.

A copy of the complaint is included with this notice. The complaint includes the incorrect address for your committee and a December 16, 2022 notice of the complaint sent to that address was returned to the Department.

The Department sent you notice of this complaint with the corrected date in a letter mailed on January 25, 2023. That letter informed you that you had 15 business days from that date to provide a response to the complaint. **As a courtesy, the Department is extending you an opportunity to submit a response within 15 business days of the date of this second notice.** If you do not submit a response within 15 business days of the date of this notice, the Department will have no choice but to adjudicate the complaint based on the facts and allegations included in the complaint alone.

Section 21 of the MCFA requires that a committee other than a candidate committee have a treasurer who is a qualified elector of Michigan if the committee conducts business through an office or other facility located in Michigan. MCL 169.221(3). If, however, the committee is not required to have a Michigan resident as its treasurer, the committee must file with its S of O an irrevocable written stipulation, signed by the treasurer, agreeing that legal process served on the Secretary of State on behalf of the committee has the same effect as if personally served on the committee. MCL 169.221(4). Additionally, a committee that is required to have a Michigan resident as its treasurer must have one account in a Michigan financial institution to serve as its official depository. MCL 169.221(6).

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 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. 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 League of Women Voters-Michigan, which 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: League of Women Voters-Michigan

Protect MI Voter ID Page 3



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

#### ARIMENTOFSIA Lansing

April 12, 2023

Protect MI Voter ID 43313 Woodward Ave. #1155 Bloomfield Hills, MI 48302

Re: League of Women Voters-Michigan v. Protect MI Voter ID

Campaign Finance Complaint No. 2022-10-166-221

#### Dear Protect MI Voter ID:

The Department of State (Department) has finished its initial investigation of the campaign finance complaint filed against you by League of Women Voters-Michigan alleging violations of the Michigan Campaign Finance Act (MCFA or Act). This letter concerns the disposition of the complaint against you.

The complaint filed against you by the League of Women Voters-Michigan alleges that you violated the MCFA by citing your street address as a Michigan Staples store on your Statement of Organization (S of O). The complaint alleges this is the equivalent of using a P.O. Box, which is expressly forbidden by the S of O. In the alternative, if your committee is "conduct[ing] business through an office or other facility located in this state" (i.e. the Staples store), the complaint alleges that you are required to have as your treasurer a qualified elector of Michigan and to have one account in a Michigan financial institution. The official depository indicated on your S of O is a bank in Virginia and, while the address indicated for the treasurer is the same Staples store, the complaint alleges that the treasurer is in fact a resident of Virginia.

A December 16, 2022 notice sent by the Department to the address listed on the complaint was returned to the Department as undeliverable.

After correcting the address, the Department sent you notice of this complaint in a letter mailed on January 25, 2023. That letter informed you that you had 15 business days from that date to provide a response to the complaint. The Department did not receive a response. The Department sent a second notice of the complaint via certified mail on February 16, 2023. As a courtesy, the Department extended an opportunity to submit a response within 15 business days of the date of the second notice. The Department again did not receive a response. In the absence of a response to the allegations, the Department proceeds to the determination stage with only the evidence provided by the complainant.

Section 21 of the MCFA requires that a committee other than a candidate committee have a treasurer who is a qualified elector of Michigan if the committee conducts business through an office or other facility located in Michigan. MCL 169.221(3). Additionally, a non-candidate committee that conducts business through a Michigan facility must have one account in a Michigan financial institution to serve as its official depository. MCL 169.221(6). If, however, the committee is not required to have a Michigan resident as its treasurer, the committee must file with its S of O the address of the treasurer and an irrevocable written stipulation, signed by the treasurer, agreeing that legal process served on the Secretary of State on behalf of the committee has the same effect as if personally served on the committee. MCL 169.224(2)(b), MCL 169.221(4).

You indicated on your S of O that your street address is a Staples store, when the S of O form requires "Complete Street Address (may not be a P.O. Box)." As described in the complaint, Staples provides a service by which "[y]our postal mail or parcels from any carrier can be received, forwarded, scanned, recycled, shredded, or picked up at your local store without the sender knowing it is a Staples address." The Department has determined that using a Staples address in this way would be the equivalent of using a P.O. Box, and that because use of a P.O. Box is not allowed and does not meet the standard of "conducting business", neither does a Staples store address. Under section 21 of the MCFA, a committee that is not doing business through a Michigan facility must file the address of its non-resident treasurer and an irrevocable written stipulation submitting to Michigan jurisdiction. You have done neither.

In the alternative, if you are indeed conducting business through the Staples store and not using it solely as a Michigan address, you are required to have a Michigan elector as treasurer and to have an account in a Michigan financial institution as your official depository. Your S of O indicates that your treasurer also resides at the Staples store, and that your official depository is in Virginia, meaning that you have not met these requirements.

Given your apparent failure to meet the requirements of either of these alternative options, the Department has determined that there is reason to believe that you may have violated the MCFA. This letter serves to notify you that the Department is beginning the informal resolution process. "If, after 90 business days, the secretary of state is unable to correct or prevent further violation by these informal methods, the secretary of state shall do either of the following:

- (a) Refer the matter to the attorney general for the enforcement of any criminal penalty provided by this act.
- (b) Commence a hearing as provided in subsection (11) for enforcement of any civil violation."

MCL 169.215(11).

In order to resolve this complaint, the Department requests that you amend your Statement of Organization with the Bureau of Elections. If you believe your activities fall under MCL 169.221(3), you must amend your Statement of Organization to include (a) a treasurer who is a

Protect MI Voter ID Page 3

qualified elector of this state; and (b) a financial institution in this state designated as your official depository. If you believe your activities fall under MCL 169.221(4), you must amend your Statement of Organization to include (a) an accurate out-of-state address for your treasurer; and (b) an irrevocable written stipulation signed by the treasurer as described in MCL 169.221(4).

Upon submission, the Department will review and determine whether any further enforcement action is necessary. This complaint must be resolved no later than August 21, 2023 or else the Department will have no alternative but to refer to the Department of Attorney General. If you have questions or if you believe this determination was in error, please contact us by emailing BOERegulatory@Michigan.gov.

Sincerely,

Jenny McInerney, Regulatory Attorney

Regulatory Section
Bureau of Elections

Michigan Department of State

c: League of Women Voters-Michigan



## STATE OF MICHIGAN JOCELYN BENSON, SECRETARY OF STATE

## DEPARTMENT OF STATE

LANSING

August 30, 2023

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

Re: League of Women Voters v. Protect MI Voter ID

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



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

LANSING

August 30, 2023

League of Women Voters - Michigan 600 W St. Joseph St. Lansing, MI 48933-2288

Re: League of Women Voters – Michigan v. Protect MI Voter ID

Campaign Finance Complaint No. 2022-10-166-221

Dear League of Women Voters - Michigan:

The Department of State (Department) has concluded its investigation into the complaint you submitted, and it was unable to reach a resolution in the matter. Pursuant to section 15 of the Michigan Campaign Finance Act (Act), the Department has referred the matter to the Department of Attorney General with a request that her office investigate further.

At this time, the Department will take no further action and has posted the entire file on the Department's website. If you have any questions, please do not hesitate to contact the Bureau of Elections.

Sincerely,

Jimmy Biehl, Regulatory Attorney

Jame Bill

Regulatory Section Bureau of Elections

Michigan Department of State

c: Protect MI Voter ID