



September 27, 2023

Bureau of Elections, Regulatory Section
Michigan Department of State
Richard H. Austin Building
430 W. Allegan
Lansing, Michigan 48918

Bureau of Elections,

Earlier this evening I received our household's October 2023 issue of the Kalamazoo Public Schools (KPS) Excelsior newspaper publication. My campaign committee purchased a 1/3 Block Style Ad (dimensions 6.237" x 4.792") for both the October and November 2023 issues. Upon looking at the published advertisement in print, I realized we inadvertently omitted the "paid for by" campaign disclosure statement at the base. I wanted to be sure to proactively and promptly self-report this error and acknowledge this was missed upon reviewing the final proof submitted for publication. I take full responsibility for this accidental omission error. Since discovering this error this evening, we have taken the following steps:

1. We notified the publication's advertising sales rep of the error and requested to send a revised design for the next issue, which will hit mailboxes in late October.
2. We notified our designer of the error and requested a corrected version for resubmission to the publication.
3. We are sending this letter into the Bureau of Election
4. We are copying the letter sent to the Bureau to our local County Clerk's Office and City Clerk's Office.

As a candidate running for re-election, we take this campaign rules very seriously and recognize the importance of holding ourselves to a higher standard. I deeply regret this mistake and will do my utmost to avoid future ones. Please do not hesitate to reach out if you require anything further or if I can answer any further questions.

Best regards

Chris Praedel
Candidate for Kalamazoo City Commission
cpraedel@gmail.com



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

October 31, 2023

Chris Praedel
1203 Miles Avenue
Kalamazoo, MI 49001

Re: *Praedel v. Praedel*
Campaign Finance Complaint No. 23-077

Dear Mr. Praedel:

The Department of State (Department) has finished investigating the September 27, 2023, campaign finance complaint you self-reported against yourself, disclosing that you violated the Michigan Campaign Finance Act (MCFA). This letter concerns the disposition of that complaint.

In your complaint, you disclosed that you are running for re-election to the Kalamazoo City Commission in the November 2023 election; that your campaign committee, Chris Praedel for Kalamazoo, had purchased a 1/3 Block Style Ad (dimensions 6.237" x 4.792") for both the October and November 2023 issues of the Kalamazoo Public Schools Excelsior newspaper publication; and that you inadvertently omitted the "paid for by" campaign disclosure statement at the base of the ad.

The MCFA and corresponding administrative rules require a person who produces printed material that relates to an election include the phrase "Paid for by [name and address of the person who paid for the item]." MCL 169.247(1), R 169.36(2). A knowing violation constitutes a misdemeanor offense punishable by a fine of up to \$1,000.00, imprisonment for up to 93 days, or both. MCL 169.247(6).

The Department has reviewed the evidence submitted in this matter and finds that sufficient evidence has been presented to support a finding of a potential violation of the MCFA. Because your campaign committee paid for printed materials which explicitly advocate for the election or defeat of a candidate, the materials contain express advocacy as defined by the Act. MCL 169.206(2)(j). As explained above, such materials must contain a "paid for by" statement listing the name and address of the committee purchasing the materials. However, your complaint shows that the materials omit part or all of that required statement. That absence supports the conclusion that a potential violation of the MCFA has occurred.

After reaching this conclusion, the Act requires the Department to "endeavor to correct the violation or prevent a further violation by using informal methods" if it finds that "there may be

reason to believe that a violation ... has occurred [.]” MCL 169.215(10). The objective of an informal resolution is “to correct the violation or prevent a further violation.” *Id.*

Given this, the Department concludes that a formal warning is a sufficient resolution to the complaint and is hereby advising you that MCL 169.247(1) and R 169.36(2) require you to print a complete and accurate identification statement on all campaign materials, consisting of the phrase “paid for by” followed by the full name and address of your committee.

You indicate you have since notified the publication’s advertising sales representative of the error and requested to send a revised design for the next issue, which will be mailed out in late October. Further, you stated that you have notified your designer of the error and requested a corrected version for resubmission to the publication which includes the identification statement required under the MCFA. You further state that a copy of this complaint was sent to your local County Clerk’s Office and City Clerk’s Office. Given this, the Department concludes that a formal warning is a sufficient resolution to the complaint and considers this matter closed.

Note that all printed materials referencing you or your candidacy produced in the future must include this identification statement. For all materials currently in circulation, the paid for by statement must be corrected.

Please be advised that this notice has served to remind you of your obligation under the Act to identify your printed matter and may be used in future proceedings as evidence that tends to establish a knowing violation of the Act. A knowing violation is a misdemeanor offense and may merit referral to the Attorney General for enforcement action. MCL 169.247(6), 215(10).

Sincerely,

Regulatory Section
Bureau of Elections
Michigan Department of State