

Michigan Campaign Finance Complaint

Section 1. Complainant

Name: Matthew Schonert

Daytime Telephone Number: +1 (231) 250-9931

Mailing Address: 22050 Boulder Avenue, Eastpointe, Michigan 48021

Section 2. Alleged Violator

Name: Moving Macomb Forward

Mailing Address: 12856 Belle River Road, Memphis, Michigan 48041

Section 3. Allegations

Sections of MCFA alleged to be violated:

- MCL 169.224 — failure to file a statement of organization
- MCL 169.234 — failure to file statements
- MCL 169.226(1) — failure to report contributions and/or expenditures

Explain how those sections were violated:

1. A renewal of the Macomb County Public Transportation Millage appeared on the Nov. 8, 2022, ballot.
2. I received two mailings urging me in terms of express advocacy to vote “yes” on the millage.
3. On both mailings, in the return address area was stated “Paid for regulated funds by Moving Macomb Forward”, with a return address of 12856 Belle River Rd., Memphis, MI 48041.
 - a. On both mailings, the return address area also bears the logo of Allied Union Services, a printing and mailing company located in Fenton, Michigan.¹
 - b. Both mailings were sent using the PRESRT STD postage class. One of them stated “Fenton, MI PERMIT NO. 1776”.
4. A website mentioned on the mail pieces, located at <https://renewmacombtransit.com>, also carries an identifier showing the same committee name and address.

¹ <https://alliedunionservices.com>

5. The return address included in the identifiers appears to be physically located in St. Clair County.
6. Because the committee address is located in St. Clair County and the ballot question appeared on the ballot in Macomb County, I inquired with both counties (as well as the State of Michigan) as to the status of this committee.
 - a. The Macomb County Clerk's campaign finance filings show that there was, at one time, a ballot question committee registered in Macomb County called "MOVING MACOMB FORWARD COMMITTEE" (135596). However, that committee was dissolved effective December 31, 2011, according to the Macomb County Clerk's office.² At the time of the dissolution of MOVING MACOMB FORWARD COMMITTEE, the Macomb County Clerk informed the committee treasurer that should they wish to participate in future elections, they need to file a new statement of organization.³ On the county's website, this committee is the only committee listed whose name contains "Moving Macomb Forward". To date, that committee remains in a dissolved state.
 - b. St. Clair County Elections Director Debbie Rhein informed me via email on November 1, 2022, that there is no ballot question committee registered in St. Clair County with the name "Moving Macomb Forward".
 - c. On the Michigan Secretary of State campaign finance website, no committee could be located whose name contains the phrase "Moving Macomb Forward".
7. It's unclear if the Moving Macomb Forward organization mentioned on the mailers is a continuation of the dissolved committee in Macomb County or whether they are two distinct committees with nearly identical names. Regardless, the 2022 campaign activity supporting the transit millage renewal occurred without having a filed statement of organization (or, at least not in St. Clair County or Macomb County).
8. In addition, the committee likely failed to file campaign statements as well as failed to report all of its contributions and expenditures, which may include graphic design, printing, and postage for two mass mailings and domain name registration, hosting, and development services for its website.
9. I hereby respectfully request that the Bureau of Elections investigate whether Moving Macomb Forward violated the following sections of the Michigan Campaign Finance Act:
 - a. MCL 169.224 – failing to file a statement of organization
 - b. MCL 169.234 – failing to file campaign statements
 - c. MCL 169.226(1) – failing to report contributions and expenditures

² <https://macomb.mi.campaignfinance.us/iCommitteePortal.php?iCommitteeID=3438>

³ <https://campaignfinance.us/docs.macomb.mi/48314031.pdf>

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

The following documents are attached:

- Copies of each mail piece (address side only).
- Dissolution confirmation letter sent to MOVING MACOMB FORWARD COMMITTEE and dated February 9, 2012.⁴
 - Complete committee documents are available at <https://macomb.mi.campaignfinance.us/iDocuments.php?iCommitteeID=3438>
- Email from St. Clair County Elections Director.
- Screenshot of renewmacombtransit.com home page

Section 4. Certification

I certify that to the best of my knowledge, information, and belief, formed after a reasonable inquiry under the circumstances, each factual contention of this complaint is supported by evidence.

X

Signature of Complainant

Date

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

NOT APPLICABLE

Section 6. Submission

This complaint is hereby submitted to MDOS-BOERegulatory@michigan.gov

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

⁴ Available online at <https://campaignfinance.us/docs.macomb.mi/48314031.pdf>

The Macomb County Public Transportation Millage helps seniors, veterans and people with disabilities get where they need to go.

And it helps Macomb County stay competitive and create jobs!

Vote "YES" to RENEW the millage:

- ✓ **Helps thousands of vulnerable community members get to and from work, school, doctors' appointments and the grocery store.**
- ✓ **Helps connect doctors with patients, employers with employees and businesses with customers.**
- ✓ **Helps essential workers get to critical jobs in our hospitals, grocery and retail stores, childcare and nursing home facilities around our community.**

FACT: The Macomb County Public Transportation Millage renewal is a transparent and accountable proposal. All funds are audited annually and publicly disclosed.

Vote

to RENEW Public Transportation!

RenewMacombTransit.com

For information, write to:
Moving Made Right Fund
12556 Delta Street Rd.
Memphis, TN 38141

FIRST 510
 U.S. POSTAGE
 PAID
 FENTON, MI
 PERMIT NO. 177

Source: *U.S. Census Bureau, Current Population Reports*.

1977-1980	1981-1984	1985-1988	1989-1992	1993-1996	1997-2000	2001-2004	2005-2008	2009-2012	2013-2016	2017-2020	2021-2024	2025-2028	2029-2032	2033-2036	2037-2040	2041-2044	2045-2048	2049-2052	2053-2056	2057-2060	2061-2064	2065-2068	2069-2072	2073-2076	2077-2080	2081-2084	2085-2088	2089-2092	2093-2096	2097-2100	2101-2104	2105-2108	2109-2112	2113-2116	2117-2120	2121-2124	2125-2128	2129-2132	2133-2136	2137-2140	2141-2144	2145-2148	2149-2152	2153-2156	2157-2160	2161-2164	2165-2168	2169-2172	2173-2176	2177-2180	2181-2184	2185-2188	2189-2192	2193-2196	2197-2200	2201-2204	2205-2208	2209-2212	2213-2216	2217-2220	2221-2224	2225-2228	2229-2232	2233-2236	2237-2240	2241-2244	2245-2248	2249-2252	2253-2256	2257-2260	2261-2264	2265-2268	2269-2272	2273-2276	2277-2280	2281-2284	2285-2288	2289-2292	2293-2296	2297-2300	2301-2304	2305-2308	2309-2312	2313-2316	2317-2320	2321-2324	2325-2328	2329-2332	2333-2336	2337-2340	2341-2344	2345-2348	2349-2352	2353-2356	2357-2360	2361-2364	2365-2368	2369-2372	2373-2376	2377-2380	2381-2384	2385-2388	2389-2392	2393-2396	2397-2400	2401-2404	2405-2408	2409-2412	2413-2416	2417-2420	2421-2424	2425-2428	2429-2432	2433-2436	2437-2440	2441-2444	2445-2448	2449-2452	2453-2456	2457-2460	2461-2464	2465-2468	2469-2472	2473-2476	2477-2480	2481-2484	2485-2488	2489-2492	2493-2496	2497-2500	2501-2504	2505-2508	2509-2512	2513-2516	2517-2520	2521-2524	2525-2528	2529-2532	2533-2536	2537-2540	2541-2544	2545-2548	2549-2552	2553-2556	2557-2560	2561-2564	2565-2568	2569-2572	2573-2576	2577-2580	2581-2584	2585-2588	2589-2592	2593-2596	2597-2600	2601-2604	2605-2608	2609-2612	2613-2616	2617-2620	2621-2624	2625-2628	2629-2632	2633-2636	2637-2640	2641-2644	2645-2648	2649-2652	2653-2656	2657-2660	2661-2664	2665-2668	2669-2672	2673-2676	2677-2680	2681-2684	2685-2688	2689-2692	2693-2696	2697-2700	2701-2704	2705-2708	2709-2712	2713-2716	2717-2720	2721-2724	2725-2728	2729-2732	2733-2736	2737-2740	2741-2744	2745-2748	2749-2752	2753-2756	2757-2760	2761-2764	2765-2768	2769-2772	2773-2776	2777-2780	2781-2784	2785-2788	2789-2792	2793-2796	2797-2800	2801-2804	2805-2808	2809-2812	2813-2816	2817-2820	2821-2824	2825-2828	2829-2832	2833-2836	2837-2840	2841-2844	2845-2848	2849-2852	2853-2856	2857-2860	2861-2864	2865-2868	2869-2872	2873-2876	2877-2880	2881-2884	2885-2888	2889-2892	2893-2896	2897-2900	2901-2904	2905-2908	2909-2912	2913-2916	2917-2920	2921-2924	2925-2928	2929-2932	2933-2936	2937-2940	2941-2944	2945-2948	2949-2952	2953-2956	2957-2960	2961-2964	2965-2968	2969-2972	2973-2976	2977-2980	2981-2984	2985-2988	2989-2992	2993-2996	2997-3000	3001-3004	3005-3008	3009-3012	3013-3016	3017-3020	3021-3024	3025-3028	3029-3032	3033-3036	3037-3040	3041-3044	3045-3048	3049-3052	3053-3056	3057-3060	3061-3064	3065-3068	3069-3072	3073-3076	3077-3080	3081-3084	3085-3088	3089-3092	3093-3096	3097-3100	3101-3104	3105-3108	3109-3112	3113-3116	3117-3120	3121-3124	3125-3128	3129-3132	3133-3136	3137-3140	3141-3144
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2004-05-01

TEL: 616 607-170 37145
 MATTHEW ROSS SCHOENT
 222050 SOULDER AVE
 Eastville MI 49821-3004

Public transportation helps vulnerable residents in Macomb County get to the places they need to go

Thousands of seniors and veterans with disabilities rely on the SMART bus. For working parents and low-income residents, SMART is a critical lifeline to employment, childcare and essential services

Vote **YES** to **RENEW** The Macomb County Transportation Millage

- Supports SMART bus service for Macomb residents
- Helps essential workers get to work at hospitals, grocery stores, child care and nursing home facilities
- Creates jobs, supports small businesses and keeps Macomb County competitive

A transparent and accountable millage renewal:

- Every dollar collected and spent is required to be publicly tracked on a website
- If renewed, this proposal would cost the average Macomb County homeowner \$6 month
- Millage funds undergo independent yearly audits to ensure taxpayer dollars are spent wisely



Visit RenewMacombTransit.com to get more information and view our many endorsements.

MACOMB COUNTY PUBLIC TRANSPORTATION MILLAGE

This proposal represents a reduction in previous years' millage rate. If approved, this proposal will reduce the millage rate from 0.5 mills for the years 2022 through 2026, for the purpose of providing continued support for the Suburban Mobility Authority for Regional Transportation (SMART) and its public transportation services for the elderly, the disabled, and the general public in Macomb County.



Paid for with regulated funds by Moving
Macomb Forward, 12856 Belle River Rd.
Memphis, MI 48041



PRSRT STD
U.S. POSTAGE
PAID
ALLIED UNION
SERVICES

ANP_01_HELP5



ECRWSH**C039

P-9 P50 081057 37070

MATTHEW ROSS SCHONERT
OR CURRENT RESIDENT
22050 BOULDER AVE
EASTPOINTE MI 48021-2304



Todd Schmitz
Deputy Clerk

Carmella Sabaugh

Macomb County
Clerk/Register of Deeds

Betty A. Oleksik
Deputy Register of Deeds

February 9, 2012

Mr. Frank Coppola
Treasurer
Moving Macomb Forward
15985 Canal Road
Clinton Twp., MI 48038

Dear Mr. Coppola:

Per your request, Committee #135596, Moving Macomb Forward, has been dissolved effective December 31, 2011.

If you wish to participate in future elections, it will be necessary to form a new committee and file an original Statement of Organization with us.

Please feel free to call the Elections Dept. of my office at (586) 469-5209 if you have any questions about this matter. Thank you.

Yours truly,

Carmella Sabaugh
Macomb County Clerk / Register of Deeds

Clerk's Office
40 N. Main St.
Mount Clemens, MI 48043
586-469-5120
Fax: 586-783-8184

<http://www.macombcountymi.gov/clerksoffice>
clerksoffice@macombcountymi.gov

Fax-on-Demand
Michigan: 1-888-99-CLERK
Out-of-State: 310-575-5035

Register of Deeds
10 N. Main St.
Mount Clemens, MI 48043
586-469-5175
Fax: 586-469-5130

<http://www.macombcountymi.gov/registerdeeds>
registerdeeds@macombcountymi.gov



Matt Schonert <mrschonert@gmail.com>

FOIA Request

1 message

Rhein, Deborah E <derhein@stclaircounty.org>
To: "mrschonert@gmail.com" <mrschonert@gmail.com>

Tue, Nov 1, 2022 at 9:03 AM

Good morning,

We do not have a ballot question committee registered in our county with the name Moving Macomb Forward.

Debbie Rhein

Elections Director, St. Clair County

201 McMorran Blvd

Port Huron, MI 48060

derhein@stclaircounty.org

P: 810-985-2159

F: 810-985-2241



https://renewmacombtransit.com



VOTE YES | Renew Macomb County Public Transportation Millage

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Paid for with regulated funds by Moving Macomb Forward
12856 Belle River Rd. Memphis, MI 48041
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STATE OF MICHIGAN
JOCELYN BENSON, SECRETARY OF STATE
DEPARTMENT OF STATE
LANSING

February 6, 2023

Moving Macomb Forward
12856 Belle River Road
Memphis, MI 48041

Re: *Schonert v Moving Macomb Forward*
Campaign Finance Complaint No. 23-006

Dear Moving Macomb Forward:

The Department of State (Department) has received a formal complaint filed against you by Matthew Schonert alleging that you violated the Michigan Campaign Finance Act (MCFA or Act). Specifically, the complaint alleges that you either sent elections materials out from a dissolved committee or that you failed to form a committee. Regardless of the circumstances, the complaint alleges that you then failed to file the required campaign finance reports required of a committee. A copy of the complaint is included with this notice.

Section 24 requires committees to file a statement of organization with the proper filing official within 10 days after the committee is formed. MCL 169.224(1). Section 24 details specific requirements for all statements of organization that must be filed. *See* MCL 169.224(2)-(3). A person who fails to file a timely statement is subject to a civil fine of up to \$1,000. MCL 169.221(13). A person who fails to file a statement of organization shall pay a late filing fee of \$10.00 per business day the report is not filed, not to exceed \$300. MCL 169.224(1). A person failing to file a statement of organization after 30 days is guilty of a misdemeanor punishable by a fine of up to \$1,000. *Id.*

By statutory definition, a committee is formed when "a person receives contributions or makes expenditures for the purpose of influencing or attempting to influence the action of the voters for or against [candidate, ballot question, etc.] if contributions received total \$500.00 or more in a calendar year or expenditures made total \$500.00 or more in a calendar year." MCL 169.203(4). For purposes of determining whether a committee exists, the word "person" includes "a group of persons acting jointly." 169.211(2).

The MCFA requires that candidates and committees record the full name, street address, amount contributed, and date of contribution for each individual from whom contributions are received. MCL 169.226(1)(e). Further, if the individual's cumulative contributions are more than \$100.00, the candidate or committee must also report the individual's occupation, employer, and principal place of business. *Id.* For each person other than an individual, candidates and committees need not include the additional employment information but must provide all other contributor information previously listed. MCL 169.226(1)(g).

The MCFA requires ballot question committees to file contributions and expenditures with the appropriate filing official by specific dates. MCL 169.234(1) – (3). A treasurer who knowingly omits or underreports expenditures required to be disclosed by the Act is subject to a civil fine of not more than \$1,000 or the amount of the expenditures omitted or underreported, whichever is greater. MCL 169.234(7).

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 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 Mr. Schonert, who 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: Matthew Schonert



Dykema Gossett PLLC
Capitol View
201 Townsend Street, Suite 900
Lansing, MI 48933

WWW.DYKEMA.COM

Tel: (517) 374-9100

Fax: (517) 374-9191

W. Alan Wilk

Direct Dial: (517) 374-9122

Direct Fax: (855) 256-1485

Email: WAWilk@dykema.com

March 14, 2023

Via Email and U.S. Mail

Michigan Department of State
Richard H. Austin Building, 1st Floor
430 West Allegan Street
Lansing, MI 48918
E-Mail: BOERegulatory@michigan.gov

Re: Response to Campaign Finance Complaint No. 23-006
Schonert v Moving Macomb Forward

Dear Bureau of Elections:

Our firm represents the ballot question committee that is currently named Macomb Moving Forward, but that was originally named Moving Macomb Forward before its name was amended ("MMF"). This is in response to the Bureau of Elections' letter dated February 6, 2023 regarding a complaint filed against Moving Macomb Forward by Matthew Schonert ("Complainant") alleging certain violations of the Michigan Campaign Finance Act (the "Act"), 1976 PA 388, as amended, MCL 169.201 *et seq*, including alleged violations of MCL 169.244 for failing to file a statement of organization, MCL 169.234 for failing to file a campaign statements, and MCL 169.226(1) for failing to report expenditures and contributions.

We note that this complaint and the Bureau's letter use the MMF address (as opposed to the address of a prior committee that used the Moving Macomb Forward name and was dissolved in 2011). Therefore, to the extent that this complaint is deemed to be directed at MMF, for these alleged violations, MMF states a violation of the Act has not occurred.

However, MMF does admit that the interchange of the two names "Moving" and "Macomb" is confusing, and to try and avoid that confusion with the prior committee, MMF originally registered with one name and almost immediately changed to the other. MMF also acknowledges that its "paid for by" statement on the two mailings identified by Mr. Schonert would have been better if it used the amended name "Macomb Moving Forward" as opposed to the original committee name of "Moving Macomb Forward."

MMF (using its original and amended name) does assert, however, that it is a properly registered ballot question committee and has timely filed its contribution and expenditure reports. Its

Statement of Organization was filed with the Macomb County Clerk on October 11, 2022, and originally named the committee “Moving Macomb Forward.” (Exhibit 1). MMF then filed an amended Statement of Organization and changed the name to “Macomb Moving Forward.” (Exhibit 2). MMF has filed its contribution and expenditure reports with the Macomb County Clerk under the amended name, “Macomb Moving Forward.” (Exhibit 3).¹

MMF decided to amend the committee name to “Macomb Moving Forward” in an effort to avoid confusion because, as Mr. Schonert pointed out, “Moving Macomb Forward” resembles the name of a dissolved committee “Moving Macomb Forward Committee.” The name change has unfortunately and apparently caused more confusion to MMF’s vendor, the Macomb County Clerk, the Macomb County website—which MMF would have hoped identified its reports and filings under both the original and amended names—and unfortunately Mr. Schonert as a recipient of the MMF mailings. Notably, typing “Macomb,” “Moving,” or “Forward” individually into the Macomb County website’s “Committee Name” search function generates all of the registration and all the reports for MMF.

Admittedly, the mailers attached to the complaint reference the original committee name and state “Paid for with regulated funds by Moving Macomb Forward.” The mailers were paid for by MMF, and its pre-election expenditure report identifies the funds paid to MMF’s vendor, Byrum & Fisk Communications, to print and copy these mailers. (Exhibit 4). The printed “paid for by” statement interchanging “Macomb” and “Moving” on the mailers was an unintentional printing mistake, one that is relatively easy to make. In fact, we note with no disrespect, that in the Bureau’s February 6, 2023 letter, MMF is referred to as “Moving Macomb Forward” on page 1 and “Macomb Moving Forward” in the header on page 2. Nonetheless, we sincerely regret the inadvertent interchange of the two names.

Other than the misprint/interchange of the name on the two mailers, the address of MMF is correctly identified and matches the information MMF has submitted to the Macomb County Clerk. MMF was unaware of the printing confusion when the mailers were circulated and thus the purported violation was certainly not knowing nor intentional. MMF has asked, and we have confirmed that, corrective language on the website disclaimer was updated to remedy the confusion:²

Paid for with regulated funds by Macomb Moving Forward

¹ Also available at <https://macomb.mi.campaignfinance.us/iDocuments.php?iCommitteeID=13238>.

² Macomb Moving Forward website available at: <https://renewmacombtransit.com/>

Dykema

Michigan Department of State
March 14, 2023
Page 3

Macomb Moving Forward will ensure that all printed materials circulated in the future contain all correct information in compliance with MCL 169.247(1).³

Sincerely,

Dykema Gossett PLLC



W. Alan Wilk

123847.000001 4889-9824-6229.4

³ As of December 31, 2022, Macomb Moving Forward has been dissolved. *Exhibit 5*, Dissolution Letter.

EXHIBIT 1

MICHIGAN DEPARTMENT OF STATE
BUREAU OF ELECTIONS

ORIGINAL OR AMENDED

STATEMENT OF ORGANIZATION FORM FOR LOCAL BALLOT QUESTION COMMITTEES FILED WITH COUNTY CLERK

Information on this form is made public.

1. Committee ID #:	*2. Type of Filing: <input checked="" type="checkbox"/> Original: <input type="checkbox"/> Amendment to Items:
Eff. Date:	
*3. Date Committee was Formed: 10/06/2022	
*4. Full Name of Committee: Moving Macomb Forward	
5. Acronym or Abbreviation (if any):	
*6. Complete Committee Mailing Address (May be PO Box): P.O. Box 10030, Lansing, MI 48901	
*7. Complete Committee Street Address (May not be PO Box): 201 Townsend St. Ste. 900, Lansing, MI 48933	
*Committee Phone: 517-374-9100 *Committee Email Address: compliance@dykema.com	
Committee Fax #: Committee Website Address:	
*8. Treasurer Name and Complete Residential Address: Jeff White, 12856 Belle River Rd., Memphis, MI 48041	
Phone #: 586-634-9060 Email Address: compliance@dykema.com	
9. Designated Record Keeper Name and Complete Address: Renae Moore, 201 Townsend St., Ste. 900, Lansing, MI 48933	
Phone #: 517-374-9121 Email Address: compliance@dykema.com	
*10. REPORTING WAIVER REQUEST: <input type="checkbox"/> YES, I/WE WANT TO APPLY FOR THE REPORTING WAIVER. The committee does not expect to spend or receive in excess of \$1,000.00 in an election. I/We understand that if the committee does not spend or receive in excess of \$1,000.00 in an election, the committee does not owe detailed campaign statements. I/We further understand that the Reporting Waiver will be automatically lost if the committee exceeds the \$1,000.00 threshold and all required campaign statements must be filed. A Reporting Waiver does not exempt a committee from filing Late Contribution Reports. <input checked="" type="checkbox"/> NO, I/WE DO NOT WANT TO APPLY FOR THE REPORTING WAIVER. The committee expects to spend or receive in excess of \$1,000.00 in an election. I/We understand that the committee owes detailed campaign statements even if the committee does not spend or receive in excess of \$1,000.00 in an election. I/We further understand that the Reporting Waiver cannot be requested retroactively to avoid filing requirements and to avoid paying late filing fees. Further information regarding Reporting Waivers can be found in Appendix C of the Committee Manual.	
*11. Name and Address of Depositories or Intended Depositories of committee funds. (Michigan Bank, Credit Union or Savings & Loan Association) *Official Depository (name and address): PNC Bank, 120 N. Washington Ave., Lansing, MI 48933 Secondary Depository (name and address):	
12. List the specific ballot proposal(s) involved using the official ballot designation if available and mark support or oppose as appropriate: <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose Description: Support of the Macomb County Public Transportation millage ballot proposal. Indicate the ballot proposal district below by selecting County (include the county name), Multi-County or Local (include the name of the jurisdiction). If multi-county, list the county where the greatest number of voters eligible to vote on the proposal reside. <input checked="" type="checkbox"/> County <input type="checkbox"/> Multi-County <input type="checkbox"/> Local	
13. Verification: 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. 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.	
*Current Treasurer 	*Designated Record Keeper (If Applicable) Renae Moore Date: 10.10.22

Date: 10/11/22

EXHIBIT 2

MICHIGAN DEPARTMENT OF STATE
BUREAU OF ELECTIONS

ORIGINAL OR AMENDED

STATEMENT OF ORGANIZATION FORM FOR LOCAL BALLOT QUESTION COMMITTEES FILED WITH COUNTY CLERK

Information on this form is made public.

1. Committee ID #:	*2. Type of Filing: Original: <input checked="" type="checkbox"/> Amendment to Items: 4		Eff. Date: 10-12-22
*3. Date Committee was Formed: 10/11/2022			
*4. Full Name of Committee: Macomb Moving Forward			
5. Acronym or Abbreviation (if any):			
*6. Complete Committee Mailing Address (May be PO Box): P.O. Box 10030, Lansing, MI 48901			
*7. Complete Committee Street Address (May not be PO Box): 201 Townsend St. Ste. 900, Lansing, MI 48933			
*Committee Phone: 517-374-9100		*Committee Email Address: compliance@dykema.com	
Committee Fax #:		Committee Website Address:	
*8. Treasurer Name and Complete Residential Address: Jeff White, 12856 Belle River Rd., Memphis, MI 48041			
Phone #: 586-634-9060		Email Address: compliance@dykema.com	
9. Designated Record Keeper Name and Complete Address: Renae Moore, 201 Townsend St. Ste. 900, Lansing, MI 48933			
Phone #: 517-374-9100		Email Address: compliance@dykema.com	
*10. REPORTING WAIVER REQUEST: <input type="checkbox"/> YES, I/WE WANT TO APPLY FOR THE REPORTING WAIVER. The committee does not expect to spend or receive in excess of \$1,000.00 in an election. I/We understand that if the committee does not spend or receive in excess of \$1,000.00 in an election, the committee does not owe detailed campaign statements. I/We further understand that the Reporting Waiver will be automatically lost if the committee exceeds the \$1,000.00 threshold and all required campaign statements must be filed. A Reporting Waiver does not exempt a committee from filing Late Contribution Reports. <input checked="" type="checkbox"/> NO, I/WE DO NOT WANT TO APPLY FOR THE REPORTING WAIVER. The committee expects to spend or receive in excess of \$1,000.00 in an election. I/We understand that the committee owes detailed campaign statements even if the committee does not spend or receive in excess of \$1,000.00 in an election. I/We further understand that the Reporting Waiver cannot be requested retroactively to avoid filing requirements and to avoid paying late filing fees. Further information regarding Reporting Waivers can be found in Appendix C of the Committee Manual.			
*11. Name and Address of Depositories or Intended Depositories of committee funds. (Michigan Bank, Credit Union or Savings & Loan Association) *Official Depository (name and address): PNC Bank, 120 N. Washington Ave., Lansing, MI 48933 Secondary Depository (name and address):			
12. List the specific ballot proposal(s) involved using the official ballot designation if available and mark support or oppose as appropriate: <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose Description: Support of the Macomb County Public Transportation millage ballot proposal. Indicate the ballot proposal district below by selecting County (Include the county name), Multi-County or Local (Include the name of the jurisdiction). If multi-county, list the county where the greatest number of voters eligible to vote on the proposal reside. <input checked="" type="checkbox"/> County <input type="checkbox"/> Multi-County <input type="checkbox"/> Local			
13. Verification: 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. 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.			

*Current Treasurer

*Designated Record Keeper (If Applicable)

Date: 10.11.22

Renae Moore

Date: 10/12/22

EXHIBIT 3



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Macomb County Clerk / Register of Deeds Campaign Finance Reporting

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140248 - MACOMB MOVING FORWARD

Document	Received	Due	Pages	
Miscellaneous Filing	01/31/23	-	1	View
Dissolution Stmt	01/30/23	-	4	View
Post-Election Stmt - 11/08/2022 General Election	12/08/22	12/08/22	4	View
Pre-Election Stmt - 11/08/2022 General Election (Amended)	11/10/22	11/15/22	2	View
Error and Omission	11/01/22	-	2	View
Pre-Election Stmt - 11/08/2022 General Election	10/28/22	10/28/22	6	View
Stmt of Organization (Amended) COMMITTEE NAME, FORMATION DATE	10/12/22	-	1	View
Miscellaneous Filing NO REPORTING WAIVER LTR	10/12/22	-	1	View
Receipt	10/12/22	-	1	View
T-Receipt	10/12/22	-	1	View
R-Receipt	10/12/22	-	1	View
Stmt of Organization	10/11/22	10/17/22	1	View

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Election Links

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State Elections Page](#)[Federal Election
Commission](#)

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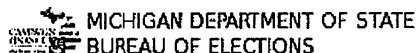
Best viewed 1024 x 768

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EXHIBIT 4

MERTS Reports

Page 1 of 6



FILED 2022 NOV 10 PM 12:28
MACOMB COUNTY CLERK

BALLOT QUESTION COVER PAGE

• Committee ID	140248-0
• Committee Name	Macomb Moving Forward
• Coverage Period	10/11/2022 - 10/23/2022
• Address Information	
• Committee Mailing	PO Box 10030 Lansing MI 48933
• Phone	
• Treasurer Name	Jeff White
• Treasurer Residential	12856 Belle River Rd Memphis MI 48041
• Phone	(586) 634-9060
• Treasurer Business	
• Phone	
• Recordkeeper Name	Renae Moore
• Recordkeeper Mailing	201 Townsend St Ste 900 Lansing MI 48933
• Phone	(517) 374-9121
• Statement Type	Amended - Pre-Election
• Relates To	General
• Election Date	11/08/2022
• Dissolution Date (effective)	//
• Qual/Non-Qual Date	//
• Annual Statement Coverage Year	
• Treasurer/Recordkeeper Signed	Renae Moore
• Date	11/10/2022

A committee that does not have a Reporting Waiver must file all required Campaign Statements. The Campaign Statements must include all applicable Schedules. Direct contributions, in-kind contributions, loans, expenditures, and outstanding debts count against the \$1,000 Reporting Waiver threshold. If any of the information listed in the items above has changed since the information was shown on the committee's Statement of Organization, an amendment to the Statement of Organization should accompany this Campaign Statement. If a request for a Reporting Waiver is not received on or before the filing deadline of a required campaign statement, that campaign statement cannot be waived.

Verification: I/We certify that all reasonable diligence was used in the preparation of this statement and attached schedules (if any) and to the best of my/our knowledge and belief the contents are true, accurate and complete.

Current Treasurer or Designated Record keeper:

(Type or Print) Name: Renae Moore Signature: Renae Moore Date: 11/10/2022

MERTS Reports

Page 6 of 6

DIRECT EXPENDITURES (4B) BALLOT QUESTION

Committee ID	140248-0
Committee Name	Macomb Moving Forward
Document Name	Amended - Pre-Election General

4118- -Change

Date: 10/17/2022

Amt: 18,000.00

Cumul: 18,000.00

Name: Byrum & Fisk Communications

Address: 1000 Coolidge Rd

City: East Lansing State: MI

Zip: 48823

Purpose: Operations: printing and

copying

Ballot Proposal: Public Transportation

Millage

Support or Oppose: Support

State or Local: Local

County: MACOMB

Payment on Debt/Obligation
reported on

previous statement:

Fund Raiser:

Schedule Total	\$ 18,000.00
-----------------------	---------------------

EXHIBIT 5



Anthony G. Forlini

Macomb County Clerk
Register of Deeds

Kathy Smith
Chief Deputy Clerk

Jennifer Walker
Deputy Register of Deeds

January 31, 2023

Macomb Moving Forward
P.O. Box 10030
Lansing, MI 48933

Dear Committee:

Per your request committee #140248 – CTE Macomb Moving Forward
, was dissolved, effective December 31, 2022.

Please call the Macomb County Election Department at (586) 469-5209 if
you have any questions about this information.

Sincerely,

Anthony G. Forlini
Macomb County Clerk/Register of Deeds

Cc: Jeff White; Treasurer
Renae Moore; Record Keeper

Macomb County Election Department

32 Market Street • Mount Clemens, MI 48043-5640
586-469-5209 • macombgov.org/elections • elections@macombgov.org



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

March 20, 2023

Matthew Schonert
22050 Boulder Avenue
Eastpointe, MI 48021

Via email

Re: *Schonert v. Moving Macomb Forward*
Campaign Finance Complaint No. 23-006

Dear Mr. Schonert:

The Department of State received a response from Moving Macomb Forward to the complaint you filed against them alleging a violation of the Michigan Campaign Finance Act, 1976 P.A. 388, MCL 169.201 *et seq.* A copy of the response is provided as an enclosure with this letter.

You may file a rebuttal statement after reviewing the enclosed response. If you elect to file a rebuttal statement, you are required to do so within 10 business days of the date of this letter. The rebuttal statement may be emailed to BOERegulatory@Michigan.gov or mailed to the Department of State, Bureau of Elections, Richard H. Austin Building, 1st Floor, 430 West Allegan Street, Lansing, Michigan 48918.

Sincerely,

Regulatory Section
Bureau of Elections
Michigan Department of State

c: Moving Macomb Forward



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

May 3, 2023

W. Alan Wilk
Dykema Gossett PLLC
Counsel for Macomb Moving Forward
Capitol View
201 Townsend Street, Suite 900
Lansing, MI 48933

Via email

Re: *Schonert v. Moving Macomb Forward*
Campaign Finance Complaint No. 23-006

Dear Mr. Wilk:

The Department of State (Department) has finished investigating the campaign finance complaint filed against your clients by Matthew Schonert alleging that they violated the Michigan Campaign Finance Act (MCFA or Act). This letter concerns the disposition of that complaint.

Specifically, the complaint alleges that your clients either sent election materials out from a dissolved committee or that they failed to form a committee. Regardless of the circumstances, the complaint alleges that they then failed to file the campaign finance reports required of a committee.

You responded to the complaint in a letter dated March 14, 2023. In your response, you claimed that your firm represents the ballot question committee currently named Macomb Moving Forward, but that was originally named Moving Macomb Forward (MMF). You acknowledged that the name revision could be confusing, and that “its ‘paid for by’ statement on the two mailings identified by Mr. Schonert would have been better if it had used the amended name ‘Macomb Moving Forward’ as opposed to the original committee name of ‘Moving Macomb Forward.’”

Nonetheless, you argue that MMF is a properly registered ballot question committee and has timely filed its contribution and expenditure reports. You further indicate that MMF filed its original Statement of Organization with the Macomb County Clerk on October 11, 2022, and its amended Statement of Organization, in which it amended its name, on October 12, 2022.

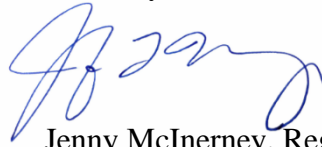
While you acknowledged that the mailers use the Moving Macomb Forward rather than the Macomb Moving Forward name in its “paid for by” statement, you argued that it was an “unintentional printing mistake”, that the mailers were paid for by MMF, and that MMF’s pre-election report shows the payments for those mailers.

In a letter dated March 20, 2023, Mr. Schonert was provided the opportunity to submit a rebuttal statement. To date, no rebuttal has been received.

The Department has reviewed the evidence submitted in this matter and finds that insufficient evidence has been presented to support a finding of a potential violation of the MCFA. While MMF indicated in its “paid for by” statement that its name was Moving Macomb Forward rather than Macomb Moving Forward, the Department accepts that this was a printing error, that MMF formed a committee as required, and that MMF appears to have filed all required reports.

Because the violation of the MCFA alleged in the complaint has not been substantiated by sufficient evidence, the Department dismisses the complaint and will take no further enforcement action. If you have any questions concerning this matter, you may contact me at BOERegulatory@Michigan.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jenny McInerney', is positioned above the typed name.

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

c: Matthew Schonert