

Michigan Campaign Finance Complaint

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MICHIGAN DEPT OF STATE
2022 JUN 17 PM 1:30
ELECTIONS/GREAT SEAL

Section 1. Complainant

Name: Matthew Ross Schonert

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

Mailing Address: 22050 Boulder Ave, Eastpointe, MI 48021

Email: mrschonert@gmail.com

Section 2. Alleged Violator

Name: Monique Renee Owens

Mailing Address: 22480 Petersburg Ave, Eastpointe, MI 48021

Email: mayormoniqueowens@gmail.com

Section 3. Allegations

Sections of MCFA alleged to be violated:

169.226

Sec. 26 (1)(d)

- The following information regarding each fund-raising event must be included in the report:
 - i. The type of event, date held, address and name, if any, of the place where the activity was held, and approximate number of individuals participating or in attendance.
 - ii. The total amount of all contributions.
 - iii. The gross receipts of the fund-raising event.
 - iv. The expenditures incident to the event.

169.226

Sec. 26 (1)(e)

- The full name of each individual from whom contributions are received during the period covered by the campaign statement, together with the individual's street address, the amount contributed, the date on which each contribution was received, and the cumulative amount contributed by that individual.

Explain how those sections were violated:

1. Monique Owens held a fundraiser on August 15, 2021.
2. At the time of the Aug 15, 2021, event, there were two active (non-dissolved) candidate committees for Monique Owens registered with the Macomb County Clerk / Register of Deeds:

1. Advertisement for August 15, 2021, event described as a “fundraiser for Monique Owens”.
2. Instagram content from Eric Lloyd depicting Lloyd and his wife Shenita Lloyd at the event. (Date: August 15, 2021)
3. Facebook content from Eric Lloyd depicting Lloyd and his wife Shenita Lloyd at the event. (Date: August 15, 2021)
4. Facebook content from Eric Lloyd depicting Lloyd, Adrian Keys, and additional unidentified persons at the event. (Date: August 15, 2021)
5. Instagram video from Epic Entertainment including the text (excerpt) “It has been a honor for Epic Entertainment Team to help the Mayor of Eastpointe bring her vision to life”. (Social media post dated August 24, 2021)
6. Instagram photo from Epic Entertainment including the text (excerpt) “It has been a honor for Epic Entertainment Team to help the Mayor of Eastpointe bring her vision to life”. (Social media post dated August 24, 2021)
7. Printout of committee details for SUPPORTERS FOR MONIQUE OWENS on file with Macomb County Clerk / Register of Deeds showing that the committee was active (not dissolved) on August 15, 2021.
8. Printout of committee details for FRIENDS OF MONIQUE OWENS on file with Macomb County Clerk / Register of Deeds showing that the committee was active (not dissolved) on August 15, 2021.
9. FRIENDS OF MONIQUE OWENS quarterly statement Jul 2021
10. FRIENDS OF MONIQUE OWENS quarterly statement Jul 2021 (amended)

Advertisement for August 15, 2021, event described as a “fundraiser for Mayor Monique Owens” charging \$75 per person and held at Drew’s Garden in Eastpointe.



TIME
6PM-9PM

NIGHT *of* EXCELLENCE

FUNDRAISER FOR
MAYOR MONIQUE OWENS

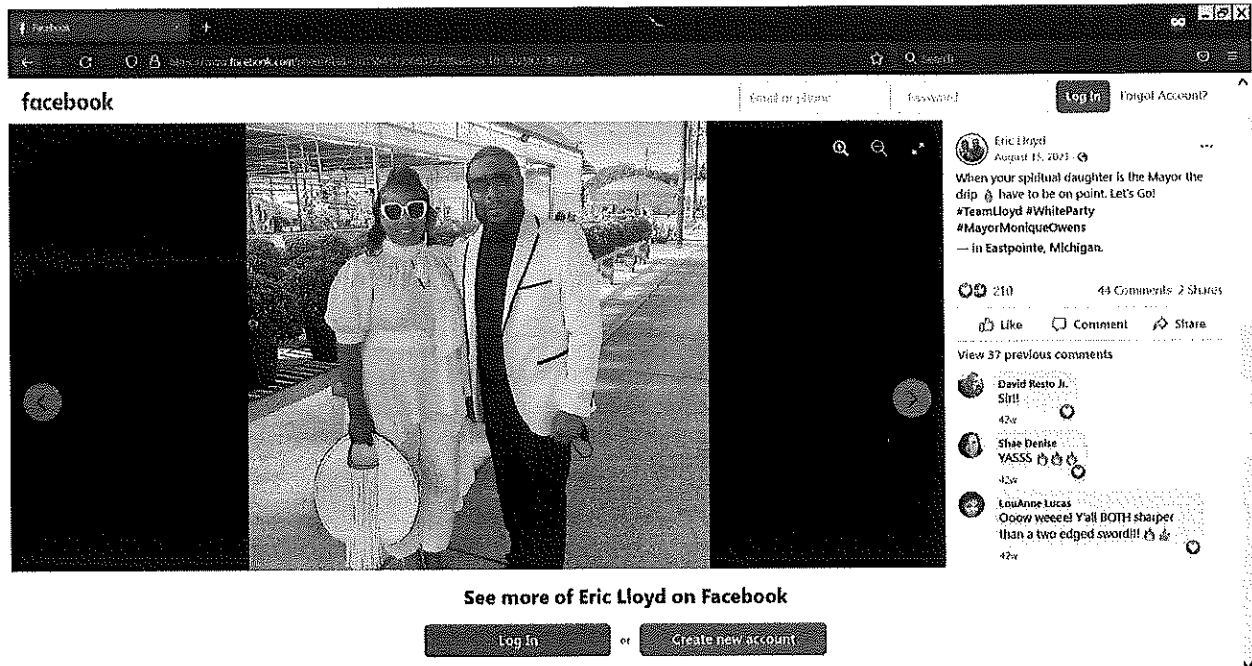
DREW'S GARDEN 23751 GRATIOT AVE, EASTPOINTE, MI 48021	PERFORMANCES BY ASHUR ISABELLA VESPRINI
---	---

FOOD PROVIDED BY: EASTPOINTE MANOR

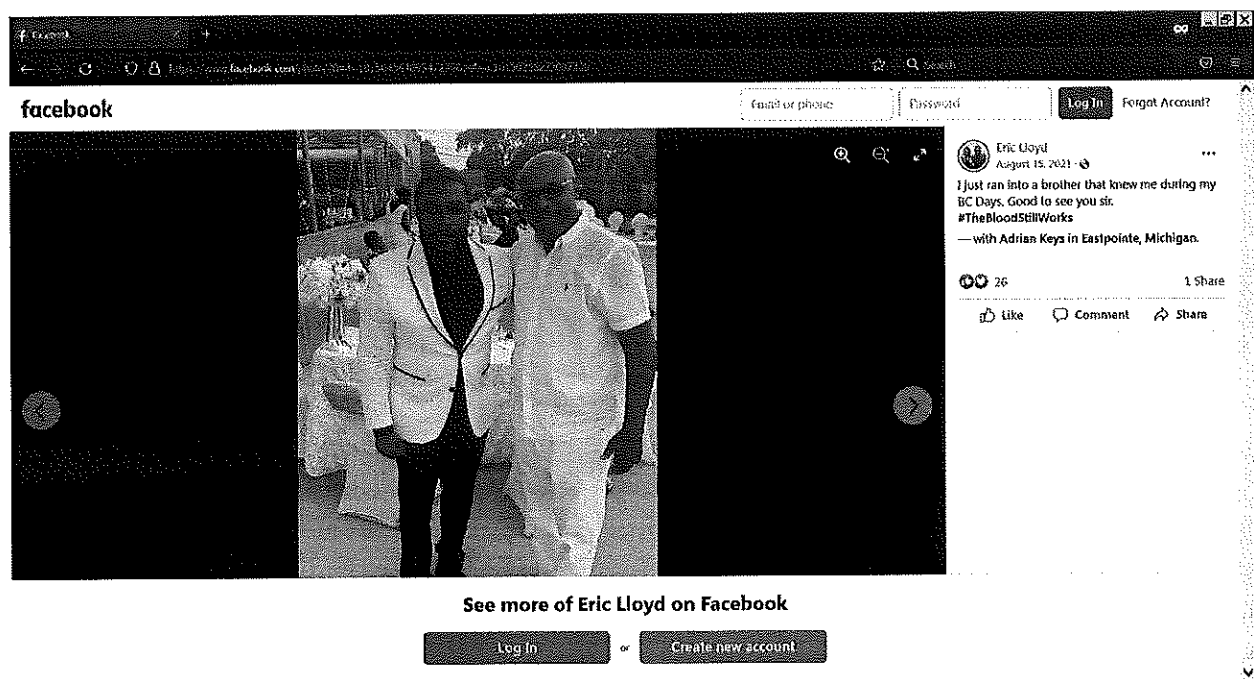
ATTIRE: ALL WHITE PRICE: \$75PP	AUGUST 15, 2021	(NO CORPORATE CHECKS AND NO AMOUNT OVER \$1200 PLEASE)
------------------------------------	---------------------------	--

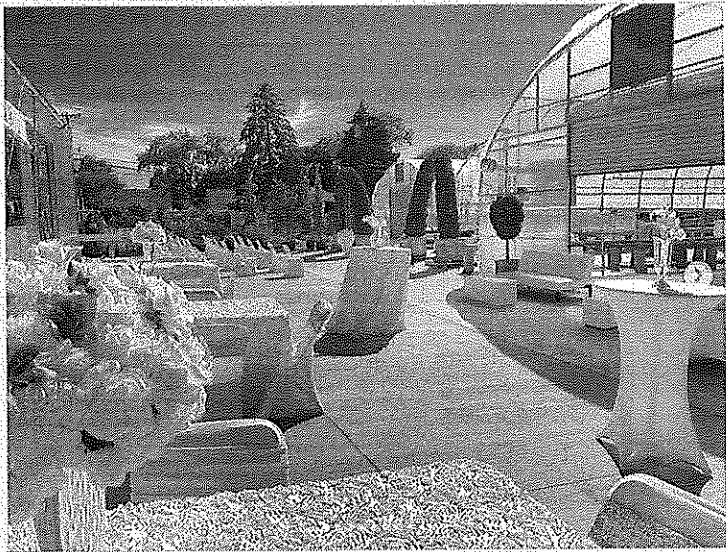
COME CELEBRATE A NIGHT OF EXCELLENCE WITH EASTPOINTE'S
OWN MAYOR MONIQUE OWENS. YOUR SUPPORT IN MY JOURNEY
IS GREATLY APPRECIATED. GOD BLESS YOU

 SupportersforMonique




Facebook content from Eric Lloyd depicting Lloyd, Adrian Keys, and additional unidentified persons at the event. The posting has a timestamp of August 15, 2021. Its tagged location is Eastpointe, Michigan. URL: <https://www.facebook.com/photo/?fbid=10158454489347239&set=a.10150258273067239>





 epicentertainmentteam • Follow ...
Drew's Garden

 epicentertainmentteam Celebrating a Night of Excellence 🏆

It has been a honor for Epic Entertainment Team to help the Mayor of Eastpointe bring her vision to life #dreambig

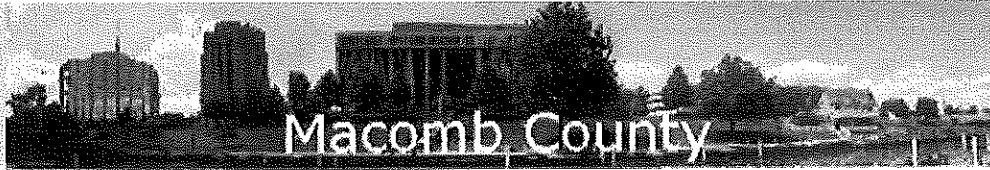


Want this elegant look? It's not too late



52 likes
AUGUST 24, 2021

Log in to like or comment.



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Macomb County Clerk / Register of Deeds Campaign Finance Reporting

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Committee Details

Committee ID: 139792

Committee Name: SUPPORTERS FOR MONIQUE OWENS

Committee Type: CANDIDATE

Formation Date: 07/15/2019

Has Waiver: No

Candidate: OWENS, MONIQUE R

Office: MAYOR

Jurisdiction: EASTPOINTE

Political Party: NON PARTISAN

Committee Address: 22480 PETERSBURG
EASTPOINTE, MI 48021

Telephone: (313) 658-3392

Mailing Address: 22480 PETERSBURG
EASTPOINTE, MI 48021

Treasurer: OWENS, MONIQUE R
22480 PETERSBURG
EASTPOINTE, MI 48021

Telephone: (313) 658-3392

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Committee Details

Committee ID: 139544

Committee Name: FRIENDS OF MONIQUE OWENS

Committee Type: CANDIDATE

Formation Date: 05/13/2017

Status: Dissolved

Dissolution Date: 11/04/2021

Has Waiver: Yes

Candidate: OWENS, MONIQUE R

Office: COUNCIL

Jurisdiction: EASTPOINTE

Political Party: NON PARTISAN

Committee Address: 22480 PETERSBURG
EASTPOINTE, MI 48021

Telephone: (313) 658-3392

Mailing Address: 22480 PETERSBURG
EASTPOINTE, MI 48021

Treasurer: OWENS, MONIQUE R
22480 PETERSBURG
EASTPOINTE, MI 48021

Telephone: (313) 658-3392

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MICHIGAN DEPARTMENT OF STATE
BUREAU OF ELECTIONS

CANDIDATE COMMITTEE
COVER PAGE

FOR OFFICIAL USE ONLY

Report must be legible, typed or printed in ink and signed by the treasurer (or designated record keeper) and candidate.

1. Committee I.D. Number

139544

2. Committee Name

Friends of Monique Owens

5. Committee's Mailing Address

2248 0 Petersburg Ave
Eastpointe, MI 48021

Area Code and Phone

(313) 658-3392

If the address in this box is different from the committee mailing address on the Statement of Organization, mail may be sent to this address by the filing official.

7. Treasurer's Business Address

(Same as above)

Area Code and Phone

3. This Statement covers From:

1/1/21 to 7/24/21

4. Candidate Last Name

Owens

First Name

Monique

M.I.

4a. Office Sought Including District # or Community Served (If applicable)

Eastpointe City Council

4b. County of Residence

Macomb

6. Treasurer's Name & Residential Address

Monique Owens
22480 Petersburg Ave
Eastpointe, MI 48021

Area Code & Phone

(313) 658-3392

8. Designated Record Keeper's Name and Address (If the committee Designated Record Keeper)

(Same as above)

Area Code and Phone

9. TYPE OF STATEMENT

9a. ☐ Pre-Election OR 9b. ☐ Post-Election

Pre-Election or Post-Election Statement relates to:

- ☐ Primary
☐ General
☐ Convention
☐ Special
☐ School
☐ Caucus

Date of Election, Convention or Caucus

Required ONLY if candidate is not on the ballot for the current year.

- ☒ July Quarterly
☐ October Quarterly

9c. ☐ Annual Statement () Coverage Year

9d. ☐ Amendment to Campaign Statement (Complete Item 9a, 9b, 9c or 9e to indicate which Statement is being amended.)

9e. Dissolution of Candidate Committee

☐ By checking this item I/We certify any outstanding debt by the committee to the candidate or his or her spouse is here by discharged and forgiven, and no longer collectible from the committee. The committee has no outstanding assets, owes no late fees or has any outstanding debt.

Further, if the dissolution cannot be granted, that this be considered a request for the Reporting Waiver.

Effective date of dissolution

Note: The disposition of residual funds must be reported on Schedule 1B and the Summary Page.

10. 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

Signature

Date

Candidate

Monique Owens

Type or Print Name

Signature

Date

5/21/2021



MICHIGAN DEPARTMENT OF STATE
BUREAU OF ELECTIONS

**CANDIDATE COMMITTEE
COVER PAGE**

FOR OFFICIAL USE ONLY

Report must be legible, typed or printed in ink and signed by the treasurer (or designated record keeper) and candidate.

3. This Statement covers From: 1/1/21 to 7/24/21

1. Committee I.D. Number

139544

4. Candidate Last Name

Owens

First Name

Monique

M.I.

4a. Office Sought Including District # or Community Served (If applicable)

Eastpointe City Council

4b. County of Residence

Macomb

5. Committee's Mailing Address

2248 0 Petersburg Ave
Eastpointe, MI 48021

6. Treasurer's Name & Residential Address

Monique Owens
22480 Petersburg Ave
Eastpointe, MI 48021

Area Code and Phone

(313) 658-3392

If the address in this box is different from the committee mailing address on the Statement of Organization, mail may be sent to this address by the filing official.

Area Code & Phone

(313) 658-3392

7. Treasurer's Business Address

(Same as above)

8. Designated Record Keeper's Name and Address (If the committee Designated Record Keeper)

(Same as above)

Area Code and Phone

Area Code and Phone

9. TYPE OF STATEMENT

9a. ☐ Pre-Election OR 9b. ☐ Post-Election

Pre-Election or Post-Election Statement relates to:

- ☐ Primary
☐ General
☐ Convention
☐ Special
☐ School
☐ Caucus

Required ONLY if candidate is not on the ballot for the current year:

- ☒ July Quarterly
☐ October Quarterly

9c. ☐ Annual Statement () Coverage Year

9d. ☐ Amendment to Campaign Statement (Complete Item 9a, 9b, 9c or 9e to indicate which Statement is being amended.)

Date of Election, Convention or Caucus

9e. Dissolution of Candidate Committee

☒ By checking this item I/We certify any outstanding debt by the committee to the candidate or his or her spouse is here by discharged and forgiven, and no longer collectible from the committee. The committee has no outstanding assets, owes no late fees or has any outstanding debt.

Further, if the dissolution cannot be granted, that this be considered a request for the Reporting Waiver.

Effective date of dissolution

5/25/2021

Note: The disposition of residual funds must be reported on Schedule 1B and the Summary Page.

10. 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

Signature

Date

Candidate

Monique Owens

Type or Print Name

Signature

Date

5/25/2021



**CANDIDATE COMMITTEE
COVER PAGE**

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Report must be legible, typed or printed in ink and signed by the treasurer (or designated record keeper) and candidate.

1. Committee I.D. Number

139544

2. Committee Name

Friends of Monique Owens

5. Committee's Mailing Address

22480 Petersburg Ave
Eastpointe, MI 48021

Area Code and Phone _____

If the address in this box is different from the committee mailing address on the Statement of Organization, mail may be sent to this address by the filing official.

7. Treasurer's Business Address

(same as above)

Area Code and Phone _____

3. This Statement covers From:

Dissolution
to _____

4. Candidate Last Name

Owens

First Name

Monique

M.I.

4a. Office Sought Including District # or Community Served (If applicable)

Eastpointe City Council



4b. County of Residence **MACOMB**



6. Treasurer's Name & Residential Address

Monique Owens
22480 Petersburg Ave
Eastpointe, Michigan 48021

Area Code & Phone (313) 658-3392

8. Designated Record Keeper's Name and Address (If the committee has a Designated Record Keeper)

(same as above)

Area Code and Phone _____

9. TYPE OF STATEMENT

9a. ☐ Pre-Election OR 9b. ☐ Post-Election

Pre-Election or Post-Election Statement relates to:

- ☐ Primary
☐ General
☐ Convention
☐ Special
☐ School
☐ Caucus

Date of Election, Convention or Caucus

Required ONLY if candidate is not on the ballot for the current year:

- ☐ July Quarterly
☒ October Quarterly

9c. ☐ Annual Statement (_____) Coverage Year

9d. ☐ Amendment to Campaign Statement (Complete Item 9a, 9b, 9c or 9e to indicate which Statement is being amended.)

9e. Dissolution of Candidate Committee

☒ By checking this item I/We certify any outstanding debt by the committee to the candidate or his or her spouse is hereby discharged and forgiven, and no longer collectible from the committee. The committee has no outstanding assets, owes no late fees or has any outstanding debt.

Further, if the dissolution cannot be granted, that this be considered a request for the Reporting Waiver.

Effective date of dissolution

10/25/2021

Note: The disposition of residual funds must be reported on Schedule 1B and the Summary Page.

10. 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

Monique Owens

Type or Print Name

Signature

Date

10/25/2021

Candidate

Monique Owens

Type or Print Name

Signature

Date

10/25/2021



MICHIGAN DEPARTMENT OF STATE
BUREAU OF ELECTIONS

FILED

21 JUN 11 PM 2:04

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CANDIDATE COMMITTEE
COVER PAGE

Report must be legible, typed or printed in ink and signed by the treasurer (or designated record keeper) and candidate.

1. Committee I.D. Number

139792

2. Committee Name

Supporters for Monique Owens

5. Committee's Mailing Address

22480 Petersburg Ave
Eastpointe, MI 48021

Area Code and Phone

If the address in this box is different from the committee mailing address on the Statement of Organization, mail may be sent to this address by the filing official.

7. Treasurer's Business Address

(same as above)

Area Code and Phone

3. This Statement covers From: 1/1/21 to 7/20/21
MACOMB COUNTY CLERK

4. Candidate Last Name

OWENS

First Name

Monique

M.I.

R

4a. Office Sought Including District # or Community Served (If applicable)

Mayor

4b. County of Residence

Macomb

6. Treasurer's Name & Residential Address

Monique OWENS
22480 Petersburg Ave
Eastpointe, MI 48021

Area Code & Phone

(313) 658-3392

8. Designated Record Keeper's Name and Address (If the committee has a Designated Record Keeper)

(same as above)

Area Code and Phone

9. TYPE OF STATEMENT

9a. ☐ Pre-Election OR 9b. ☐ Post-Election

Pre-Election or Post-Election Statement relates to:

☐ Primary

☐ General

☐ Convention

☐ Special

☐ School

☐ Caucus

Date of Election, Convention or Caucus

Required ONLY if candidate is not on the ballot for the current year:

☒ July Quarterly (2021)

☐ October Quarterly

9c. ☐ Annual Statement () Coverage Year

9d. ☐ Amendment to Campaign Statement (Complete Item 9a, 9b, 9c or 9e to indicate which Statement is being amended.)

9e. Dissolution of Candidate Committee

☐ By checking this item I/We certify any outstanding debt by the committee to the candidate or his or her spouse is here by discharged and forgiven, and no longer collectible from the committee. The committee has no outstanding assets, owes no late fees or has any outstanding debt.

Further, if the dissolution cannot be granted, that this be considered a request for the Reporting Waiver.

Effective date of dissolution

Note: The disposition of residual funds must be reported on Schedule 1B and the Summary Page.

10. 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

Monique Owens
Type or Print Name

Signature

Date

6/11/2021

Candidate

Monique Owens
Type or Print Name

Signature

Date

6/11/2021



MICHIGAN DEPARTMENT OF STATE
BUREAU OF ELECTIONS

DEBTS AND OBLIGATIONS
SCHEDULE 1E
CANDIDATE COMMITTEE

1. Committee I.D. Number 139792
2. Committee Name Supporters for Monique Owens

This Schedule itemizes:

a. ☒ Debts and obligations owed by or forgiven the committee OR b. ☐ Debts and obligations owed to or forgiven by the committee.
(Check either a or b. Use only for the purpose checked.)

3. Name and Mailing Address of person, vendor or financial institution to whom debt is owed. Check box to indicate whether debt is owed to an incorporated business. If debt is a bank loan, please provide information regarding the endorser or guarantors, if any.	4. Type of Obligation (Description) 5. Indicate date debt was incurred 6. Indicate original amount of debt	7. Date and amount of each payment	8. Cumulative payment to date on debt	9. Outstanding Balance at close of this period (Item 6 minus Item 8)
Debt #1 Corp? <input type="checkbox"/> Yes Owed to or by: Monique Owens 22480 Petersburg Ave Eastpointe, MI 48021	4. Type: <u>loan</u> 5. Date Debt Was Incurred: <u>7/15-10/20/19</u> 6. Original Amount of Debt: <u>\$ 7,976.86</u>	2,920 \$ 9/20/19 \$ \$ \$ \$	\$ 2,920	\$ 4,084.86 <input type="checkbox"/> FORGIVEN
If bank loan, name of endorser or guarantor: _____		Amount Endorsed: \$ _____		
Debt #2 Corp? <input type="checkbox"/> Yes Owed to or by: Monique Owens 22480 Petersburg Ave Eastpointe, MI 48021	4. Type: <u>loan</u> 5. Date Debt Was Incurred: <u>10/21/19 - 11/25/19</u> 6. Original Amount of Debt: <u>\$ 1,734.69</u>	1450 \$ 11/7/19 \$ \$ \$ \$	\$	\$ 284.69 <input type="checkbox"/> FORGIVEN
If bank loan, name of endorser or guarantor: _____		Amount Endorsed: \$ _____		
Debt #3 Corp? <input type="checkbox"/> Yes Owed to or by: Same as above	4. Type: <u>loan</u> 5. Date Debt Was Incurred: <u>5/17/2020</u> 6. Original Amount of Debt: <u>\$ 1600</u>	1550 \$ 5/17/20 \$ \$ \$ \$	\$	\$ <input type="checkbox"/> FORGIVEN
If bank loan, name of endorser or guarantor: _____		Amount Endorsed: \$ _____		

Page Subtotal (Outstanding debt)

Grand Total of all Schedules 1E

(Complete on last page of Schedule showing amounts owed by or to the committee)

2,150
2,150
E this total
on line 12a "owed
by" or line 12b
"owed to" of the
Summary Page

A debt or obligation must be shown on this Schedule if there was an outstanding amount owed on it at the closing date of this Campaign Statement or it was forgiven during the period covered by this Campaign Statement.



**CANDIDATE COMMITTEE
COVER PAGE**

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Report must be legible, typed or printed in ink and signed by the treasurer (or designated record keeper) and candidate.

1. Committee I.D. Number 139792		3. This Statement covers From: <u>7/21/21</u> to <u>10/20/21</u>	
2. Committee Name Supporters for Monique Owens		4. Candidate Last Name Owens First Name Monique M.I. 4a. Office Sought Including District # or Community Served (If applicable) Mayor <input checked="" type="checkbox"/>	
5. Committee's Mailing Address 22480 Petersburg Ave Eastpointe, MI 48021		4b. County of Residence MACOMB <input checked="" type="checkbox"/>	
Area Code and Phone _____ If the address in this box is different from the committee mailing address on the Statement of Organization, mail may be sent to this address by the filing official.		6. Treasurer's Name & Residential Address Monique Owens 22480 Petersburg Ave Eastpointe, Michigan 48021	
7. Treasurer's Business Address same as above		8. Designated Record Keeper's Name and Address (If the committee has a Designated Record Keeper) (same as above)	
Area Code and Phone _____		Area Code & Phone (313) 658-3392	

9. TYPE OF STATEMENT 9a. <input type="checkbox"/> Pre-Election OR 9b. <input type="checkbox"/> Post-Election Pre-Election or Post-Election Statement relates to: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Convention <input type="checkbox"/> Special <input type="checkbox"/> School <input type="checkbox"/> Caucus Date of Election, Convention or Caucus _____		Required ONLY if candidate is not on the ballot for the current year: <input type="checkbox"/> July Quarterly <input checked="" type="checkbox"/> October Quarterly 9c. <input type="checkbox"/> Annual Statement (_____) Coverage Year 9d. <input type="checkbox"/> Amendment to Campaign Statement (Complete Item 9a, 9b, 9c or 9e to indicate which Statement is being amended.)		9e. Dissolution of Candidate Committee <input type="checkbox"/> By checking this item I/We certify any outstanding debt by the committee to the candidate or his or her spouse is hereby discharged and forgiven, and no longer collectible from the committee. The committee has no outstanding assets, owes no late fees or has any outstanding debt. Further, if the dissolution cannot be granted, that this be considered a request for the Reporting Waiver. Effective date of dissolution _____ Note: The disposition of residual funds must be reported on Schedule 1B and the Summary Page.	
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0. 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	Monique Owens		Date	10/25/2021
	Type or Print Name	Signature		
Candidate	Monique Owens		Date	10/25/2021
	Type or Print Name	Signature		



**CANDIDATE COMMITTEE
COVER PAGE**

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Report must be legible, typed or printed in ink and signed by the treasurer (or designated record keeper) and candidate.

3. This Statement covers From: 10/21/2021 to 01/31/2022

1. Committee I.D. Number

139792

2. Committee Name

Supporters for Monique Owens

5. Committee's Mailing Address

**P.O. Box 97
Eastpointe, Michigan 48021**

Area Code and Phone _____

If the address in this box is different from the committee mailing address on the Statement of Organization, mail may be sent to this address by the filing official.

7. Treasurer's Business Address

same as above

Area Code and Phone _____

4. Candidate Last Name

First Name

M.I.

Owens

Monique

4a. Office Sought Including District # or Community Served (If applicable)

Mayor

4b. County of Residence **MACOMB**

6. Treasurer's Name & Residential Address

same as above

Area Code & Phone _____

8. Designated Record Keeper's Name and Address (If the committee has a Designated Record Keeper)

same as above

Area Code and Phone _____

9. TYPE OF STATEMENT

9a. ☐ Pre-Election OR 9b. ☐ Post-Election

Pre-Election or Post-Election Statement relates to:

☐ Primary

☐ General

☐ Convention

☐ Special

☐ School

☐ Caucus

Date of Election, Convention or Caucus

Required ONLY if candidate is not on the ballot for the current year:

☐ July Quarterly

☐ October Quarterly

9c. ☐ Annual Statement (_____) Coverage Year

9d. ☐ Amendment to Campaign Statement (Complete Item 9a, 9b, 9c or 9e to indicate which Statement is being amended.)

9e. Dissolution of Candidate Committee

☐ By checking this item I/We certify any outstanding debt by the committee to the candidate or his or her spouse is here by discharged and forgiven, and no longer collectible from the committee. The committee has no outstanding assets, owes no late fees or has any outstanding debt.

Further, if the dissolution cannot be granted, that this be considered a request for the Reporting Waiver.

Effective date of dissolution

Note: The disposition of residual funds must be reported on Schedule 1B and the Summary Page.

10. 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 **Monique Owens**

Type or Print Name

Signature

Date

1/31/2022

Candidate

Monique Owens

Type or Print Name

Signature

Date

1/31/2022



FILED 2022 MAR 14 AM 8:13
MACOMB COUNTY CLERK
FILED 2022 JAN 31 PM 4:36
MACOMB COUNTY CLERK

FOR OFFICIAL USE ONLY

Report must be legible, typed or printed in ink and signed by the treasurer (or designated record keeper) and candidate.

3. This Statement covers From: 10/21/2021 to 12/31/21

<p>1. Committee I.D. Number 139792</p> <p>2. Committee Name Supporters for Monique Owens</p>	<p>4. Candidate Last Name Owens</p> <p>First Name Monique</p> <p>4a. Office Sought Including District # or Community Served (If applicable) Mayor</p> <p>4b. County of Residence MACOMB</p>
<p>5. Committee's Mailing Address P.O. Box 97 Eastpointe, Michigan 48021</p> <p>Area Code and Phone _____ If the address in this box is different from the committee mailing address on the Statement of Organization, mail may be sent to this address by the filing official.</p>	<p>6. Treasurer's Name & Residential Address same as above</p> <p>Area Code & Phone _____</p>
<p>7. Treasurer's Business Address same as above</p> <p>Area Code and Phone _____</p>	<p>8. Designated Record Keeper's Name and Address (If the committee has a Designated Record Keeper) same as above</p> <p>Area Code and Phone _____</p>

<p>9. TYPE OF STATEMENT</p> <p>9a. <input type="checkbox"/> Pre-Election OR 9b. <input type="checkbox"/> Post-Election</p> <p>Pre-Election or Post-Election Statement relates to:</p> <p><input type="checkbox"/> Primary</p> <p><input type="checkbox"/> General</p> <p><input type="checkbox"/> Convention</p> <p><input type="checkbox"/> Special</p> <p><input type="checkbox"/> School</p> <p><input type="checkbox"/> Caucus</p>	<p>Required ONLY if candidate is not on the ballot for the current year:</p> <p><input type="checkbox"/> July Quarterly</p> <p><input type="checkbox"/> October Quarterly</p>	<p>9e. Dissolution of Candidate Committee</p> <p><input type="checkbox"/> By checking this item, I/We certify any outstanding debt by the committee to the candidate or his or her spouse is not by discharged and forgiven, and no longer collectible from the committee. The committee has no outstanding assets, owes no late fees or has any outstanding debt.</p> <p>Further, if the dissolution cannot be certified that this be considered a request for the Reporting Waiver.</p>
<p>Date of Election, Convention or Caucus</p> <p>_____</p>	<p>9c. <input checked="" type="checkbox"/> Annual Statement (<u>2021</u>) Coverage Year</p> <p>9d. <input type="checkbox"/> Amendment to Campaign Statement (Complete Item 9a, 9b, 9c or 9e to indicate which Statement is being amended.)</p>	<p>Effective date of dissolution</p> <p>_____</p> <p>Note: The disposition of real estate must be reported on Schedule 1B and the Summary Page.</p>

10. Verification: I/We certify that all reasonable diligence was used in the preparation of this statement and attached exhibits (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	Monique Owens	<i>Monique Owens</i>	03/13/22
	Type of Print Name	Signature	Date

Candidate	Monique Owens	
Inspector/Notary		Signature



MICHIGAN DEPARTMENT OF STATE
BUREAU OF ELECTIONS

DEBTS AND OBLIGATIONS
SCHEDULE 1E
CANDIDATE COMMITTEE

1. Committee I.D. Number 13972
2. Committee Name Supporters for Monique Owens

This Schedule itemizes:

a ☒ Debts and obligations owed by or forgiven the committee OR b ☐ Debts and obligations owed to or forgiven by the committee.
(Check either a or b. Use only for the purpose checked.)

3. Name and Mailing Address of person, vendor or financial institution to whom debt is owed. Check box to indicate whether debt is owed to an incorporated business. If debt is a bank loan, please provide information regarding the endorser or guarantors, if any.	4. Type of Obligation (Description) 5. Indicate date debt was incurred 6. Indicate original amount of debt	7. Date and amount of each payment	8. Cumulative payment to date on debt	9. Outstanding Balance at close of this period (Item 5 minus Item 8) <input type="checkbox"/> FORGIVEN
Debt #1 Corp? <input type="checkbox"/> Yes Owed to or by: <u>Monique Owens</u> <u>22480 Petersburg Ave</u> <u>Eastpointe, MI 48021</u>	4. Type: <u>loan</u> 5. Date Debt Was Incurred: <u>7/15-10/20/19</u> 6. Original Amount of Debt: <u>\$ 7,976.86</u>	<u>2,920</u> \$ <u>9/20/19</u> \$ \$ \$ \$	\$ <u>2,920</u>	\$ <u>4,054.86</u> <input type="checkbox"/> FORGIVEN
If bank loan, name of endorser or guarantor: _____ Amount Endorsed: \$ _____				
Debt #2 Corp? <input type="checkbox"/> Yes Owed to or by: <u>Monique Owens</u> <u>22480 Petersburg Ave</u> <u>Eastpointe, MI 48021</u>	4. Type: <u>loan</u> 5. Date Debt Was Incurred: <u>10/21/19-11/25/19</u> 6. Original Amount of Debt: <u>\$ 1,734.69</u>	<u>1450</u> \$ <u>11/7/19</u> \$ \$ \$ \$	\$	\$ <u>2,184.69</u> <input type="checkbox"/> FORGIVEN
If bank loan, name of endorser or guarantor: _____ Amount Endorsed: \$ _____				
Debt #3 Corp? <input type="checkbox"/> Yes Owed to or by: <u>"Same as above"</u>	4. Type: <u>loan</u> 5. Date Debt Was Incurred: <u>5/17/2020</u> 6. Original Amount of Debt: <u>\$ 600</u>	<u>1550</u> \$ <u>5/17/20</u> \$ \$ \$ \$	\$	\$ <u>1,550</u> <input type="checkbox"/> FORGIVEN
If bank loan, name of endorser or guarantor: _____ Amount Endorsed: \$ _____				

Page 1 of 1 (Outstanding debt) 1,550

(Combine on last page of Schedule 1E any amounts owed by or to the committee.)

A debt or obligation must be shown on this Schedule if it was an outstanding amount owed on it at the close of this Campaign Statement or if it was forgiven during the period covered by this Campaign Statement.

Michigan Campaign Finance Complaint

RECEIVED/FILED
MICHIGAN DEPT OF STATE
2022 JUN 28 AM 9:40
ELECTIONS/GREAT SEAL

Section 1. Complainant

Name: Matthew Ross Schonert

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

Mailing Address: 22050 Boulder Ave, Eastpointe, MI 48021

Email: mrschonert@gmail.com

Section 2. Alleged Violator

Name: Monique Renee Owens

Mailing Address: 22480 Petersburg Ave, Eastpointe, MI 48021

Email: mayormoniqueowens@gmail.com

Section 3. Allegations

Sections of MCFA alleged to be violated:

169.247 Sec 47 (1)

- Except as otherwise provided in this subsection and subject to subsections (3) and (4), a billboard, placard, poster, pamphlet, or other printed matter having reference to an election, a candidate, or a ballot question, shall bear upon it an identification that contains the name and address of the person paying for the matter. Except as otherwise provided in this subsection and subsection (5) and subject to subsections (3) and (4), if the printed matter relating to a candidate is an independent expenditure that is not authorized in writing by the candidate committee of that candidate, in addition to the identification required under this subsection, the printed matter shall contain the following disclaimer: "Not authorized by any candidate committee". An individual other than a candidate is not subject to this subsection if the individual is acting independently and not acting as an agent for a candidate or any committee. This subsection does not apply to communications between a separate segregated fund established under section 55 and individuals who can be solicited for contributions to that separate segregated fund under section 55.

Explain how those sections were violated:

1. Monique Owens is a candidate in the 2022 Michigan Senate race.

2. The June 14–27 supermarket circular for FRESH CHOICE MARKET PLACE includes Owens' campaign logo, including the text "Monique Owens for State Senator" and "Michigan Wins with Owens", and does not identify the name and address of any person who may have paid for the matter.

The URL for MCL 169.247 is <http://legislature.mi.gov/doc.aspx?mcl-169-247>

Further information

Owens' campaign is organized with the State of Michigan as SUPPORTERSFORMONIQUEOWENSFORSENATE (ID: 520696). URL: <https://cfrsearch.nictusa.com/committees/520696>

Fresh Choice Market Place is located at 18801 E. Nine Mile Rd., Eastpointe, Michigan 48021. Website: <http://freshchoicemarketplace.net/>

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

The supermarket circular was available in digital form at the following URL on June 14, 2022, when this complaint was written: <https://en.calameo.com/read/005404071a5fa2f18013a>

The above URL was obtained from the home page of <http://freshchoicemarketplace.net> on June 14, 2022.

A screenshot of the circular's first page, which contains the campaign material, is included below (retrieved June 14, 2022):



A copy of the circular in its entirety is also enclosed.

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

06/14/2022

Date

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

If, after a reasonable inquiry under the circumstances, you are unable to certify that certain factual contentions are supported by evidence as indicated above, you may make the following certification:

I certify that to the best of my knowledge, information, or belief, there are grounds to conclude that the following specifically identified factual contentions are likely to be supported by evidence after a reasonable opportunity for further inquiry. Those specific contentions are:

Not applicable.

X

Signature of Complainant

Date

Section 6. Submission

This complaint is hereby submitted to:

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

OUR FINEST MEATS



<p>USDA Inspected Beef Thin Sliced Boneless New York Strip Steak</p> <p>\$7.96 lb.</p>		<p>Black Angus Beef Boneless Chuck Steak Family Pack</p> <p>\$4.96 lb.</p>	
<p>Black Angus Beef Boneless Bottom Round Steak Family Pack</p> <p>\$4.76 lb.</p>		<p>USDA Inspected Beef Oxtails</p> <p>\$7.96 lb.</p>	
<p>USDA Inspected Boneless Beef Thin Sliced Center-Cut Pork Chops Family Pack</p> <p>\$3.96 lb.</p>		<p>USDA Inspected Boneless Pork Country-Style Pork Ribs Family Pack</p> <p>\$1.96 lb.</p>	
<p>Smoked Turkey Wings, Necks or Drums Family Pack</p> <p>\$2.96 lb.</p>		<p>Smoked Pork Neck Bones Family Pack</p> <p>\$2.16 lb.</p>	
		<p>Smoked Ham Hocks Family Pack</p> <p>\$2.46 lb.</p>	

PACKAGED & LUNCH MEATS

<p>Frank's Sausage 2 lbs.</p> <p>2/\$5</p>	<p>Blue Ribbon Chili Con Carne 16 oz.</p> <p>2/\$9</p>	<p>Hillshire Farm Ultra Thin Lunch Meat Assorted Varieties 7.5 oz.</p> <p>\$4.96</p>	<p>Bar S Bologna or Salami 16 oz. (includes loaf)</p> <p>2/\$4</p>	<p>McCormick Grill-Mates Sausage Assorted Varieties 14 oz.</p> <p>2/\$7</p>
<p>Tyson Sliced Bacon 16 oz.</p> <p>2/\$11</p>	<p>Bar S Skinless Sausage 7.5 oz.</p> <p>2/\$10</p>	<p>Butterball Turkey Lunch Meat Assorted Varieties 10 oz.</p> <p>\$3.96</p>	<p>SBR Smoked Beef Bacon 16 oz.</p> <p>\$6.96</p>	<p>John Morrell Braunschweiler 16 oz.</p> <p>2/\$7</p>

FROZEN MEATS

<p>Tilapia Fillets 5 lb. bag</p> <p>\$18.96</p>	<p>Swai Fillets 5 lb. bag</p> <p>\$21.96</p>	<p>Sea Best Hush Puppies 1 lb. bag</p> <p>2/\$6</p>	<p>Chuck Wagon Corn Dogs 2.5 lbs.</p> <p>2/\$8</p>
<p>Steak-Umms Steak or Chops 9 oz.</p> <p>\$3.96</p>	<p>TJ Farms Straight Cut Fries 5 lbs.</p> <p>2/\$10</p>	<p>JTM Beef Philly Steak Kites 4 pk.</p> <p>\$11.96</p>	<p>Steak N Shake Steak Burgers 9.6 oz.</p> <p>2/\$10</p>
<p>Purnell's Sausage Patties Meat or Hot 16 oz.</p> <p>\$9.96</p>	<p>Williams Sausage Croissants 12 oz.</p> <p>2/\$9</p>	<p>Sager Creek Ready-to-Cook Tenderloins 1.5 lb.</p> <p>\$9.96</p>	<p>Happy Seas Breaded Shrimp 2 lb.</p> <p>\$12.96</p>
<p>Banquet Brown 'N Serve Links or Patties 6.4 oz.</p> <p>2/\$5</p>	<p>Brown 'N Serve Patties 6.4 oz.</p> <p>\$9.96</p>	<p>Dutch Farms Meatballs 3 lb.</p> <p>\$9.96</p>	<p>Johnsonville Grillers Assorted Varieties 24 oz.</p> <p>2/\$15</p>

EVERYDAY GROCERY

Kellogg's Family Size Cereal
Select Varieties
16.9 - 24 oz
\$3.49

Maxwell House Ground Coffee
37.7-42.5 oz.
\$9.99

Our Family 100% Juice
64 oz.
2/\$5

Kellogg's Rice Krispies Treats
(7 - 8 ct.) or Cereal Bars (6 ct.)
2/\$5

Chef Boyardee Canned Pasta
(14.5 - 15 oz.) or Microwave Cup (7.25 - 7.5 oz.)
4/\$5

Betty Crocker Delights Brownie Mix
16.5 - 18 oz.
2/\$5

Kellogg's Pop-tarts
(12 ct.) or Bites (5 ct. pouches)
\$3.49

Maxwell House Coffee
10.5-11.5 oz.
\$3.49

Newman's Own Salad Dressing
16 oz.
\$2.99

Our Family 100% Pure Maple Syrup
8 oz.
\$4.99

Skippy Peanut Butter
15-16.3 oz.
\$2.99

Kellogg's Special K Snack Bars
(6 ct.) or Pastry Crisps (12 ct.)
2/\$6

BEVERAGES & SNACKS

7-Up Products
8 pk., 12 oz. btl.
or 10 pk., 7.5 oz. mini cans (plus deposit)
3/\$12

Nabisco Family Size Cookies or Crackers
10 - 25.6 oz.
\$3.99

Kellogg's Family Size Town House or Club Crackers
or Toasted Party Pack (12 - 20.7 oz.),
Cheez-It Family Size (12 - 21 oz.)
or Multipack Cheez-It Snacks or
Kellogg's Scooby-Do! Graham
Cracker Snacks or Pringles SnackStacks (12 ct.)
\$4.69

Planters Peanuts
(Dry Roasted/Cooked)
or Honey Roasted
16 oz.
\$3.49

RITZ
FAMILY SIZE
6

CHEEZ-IT
FAMILY SIZE
12

CLUB
FAMILY SIZE
12

HOUSE & HOME

Charmin Essentials Bath Tissue
(18 ct. mega rolls),
Bounty Essentials Paper Towels
(12 ct. mega rolls)
\$13.99

Gain Liquid Laundry Detergent
(92 - 128 oz.) or
Fragrant Packs (15 ct.) or
Scent Booster (14.8 oz.)
\$10.99

Clorox Liquid Bleach
77 - 81 oz.
\$4.79

Softsoap Liquid Hand Soap
(11.25 oz.) or
Irish Spring Bar Soap (3 ct.)
\$2.49

Energizer Max Batteries
AA or AAA
4 ct.
\$6.99

Tall Kitchen Drawstring Bag
13 gallon, 20 ct.
\$3.99

Reusable Bags
Freezer Gallon (20 ct.)
or Quart (40 ct.) or
Storage Gallon (40 ct.) or Quart (50 ct.)
\$2.99

EVERYDAY GROCERY

Kellogg's Family Size Cereal
Select Varieties
16.9 - 24 oz.
\$3.49

Maxwell House Ground Coffee
37.7-42.5 oz.
\$9.99

Our Family 100% Juice
64 oz.
2/\$5

Kellogg's Rice Krispies Treats
(7 - 8 ct.) or Cereal Bars (6 ct.)
2/\$5

Chef Boyardee Canned Pasta
(14.5 - 15 oz.) or Microwave Cup (7.25 - 7.5 oz.)
4/\$5

Betty Crocker Delights Brownie Mix
16.5 - 18 oz.
2/\$5

Kellogg's Pop-tarts
(12 ct.) or Bites (6 ct. pouches)
\$3.49

Maxwell House Coffee
10.5-11.5 oz.
\$3.49

Newman's Own Salad Dressing
16 oz.
\$2.99

Our Family 100% Pure Maple Syrup
8 oz.
\$4.99

Skippy Peanut Butter
15 - 16.3 oz.
\$2.99

Kellogg's Special K Snack Bars
(6 ct.) or Pastry Crisps (12 ct.)
2/\$6

BEVERAGES & SNACKS

7-Up Products
8 pk., 12 oz. btl. or 10 pk., 7.5 oz. mini cans (plus deposit)
3/\$12

Planters Peanuts
(Dry, Roasted, Cocktail or Honey Roasted)
16 oz.
\$3.49

Nabisco Family Size Cookies or Crackers
10 - 25.6 oz.
\$3.99

Kellogg's Family Size Town House or Club Crackers
or Toasted Party Pack (12 - 20.7 oz.), Cheez-It Family Size (12 - 21 oz.) or Munchpack Cheez-It Snacks or Kellogg's Scooby-Doo! Graham Cracker Snacks or Pringles SnackSticks (12 ct.)
\$4.69

HOUSE & HOME

Charmin Essentials Bath Tissue
(18 ct. mega rolls) or Bounty Essentials Paper Towels
(12 ct. mega rolls)
\$13.99

Gain Liquid Laundry Detergent
(92 - 129 oz.) or Fingert Pads (18 ct.) or Scent Booster (14.8 oz.)
\$10.99

Clorox Liquid Bleach
77 - 81 oz.
\$4.79

Softsoap Liquid Hand Soap
(11.25 oz.) or 200 Spray Bar Soap (1 ct.)
\$2.49

Energizer Max Batteries
AA & AAA
\$6.99

Tall Kitchen Drawstring Bags
13 gallon, 20 ct.
\$3.99

Resealable Bags
Freezer Gallon (500 ct.) or Quart (40 ct.) or Quart (50 ct.)
\$2.99

OUR FINEST MEATS



<p>USDA Inspected Beef Thin Sliced Boneless New York Strip Steak</p> <p>\$7⁹⁶ lb.</p>		<p>Black Angus Beef Boneless Chuck Steak Family Pack</p> <p>\$4⁹⁶ lb.</p>	
<p>Black Angus Beef Boneless Bottom Round Steak Family Pack</p> <p>\$4⁷⁶ lb.</p>		<p>USDA Inspected Beef Oxtails</p> <p>\$7⁹⁶ lb.</p>	
<p>USDA Inspected Country-Style Bone-In Thin-Sliced Center-Cut Pork Chops Family Pack</p> <p>\$3⁹⁶ lb.</p>		<p>USDA Inspected Country-Style Bone-In Pork Ribs Family Pack</p> <p>\$1⁹⁶ lb.</p>	
<p>Smoked Turkey Wings, Necks or Drums Family Pack</p> <p>\$2⁹⁶ lb.</p>		<p>Smoked Pork Neck Bones Family Pack</p> <p>\$2¹⁶ lb.</p>	
		<p>USDA Inspected Rib End Pork Chops Family Pack</p> <p>\$2⁹⁶ lb.</p>	
		<p>Smoked Ham Hocks Family Pack</p> <p>\$2⁴⁶ lb.</p>	

PACKAGED & LUNCH MEATS

<p>Frank's Sauerkraut 2 lb.</p> <p>2/\$5</p>	<p>Blue Ribbon Chili Con Carne 16 oz.</p> <p>2/\$9</p>	<p>Hillshire Farm Ultra Thin Lunch Meat Assorted Varieties 16 oz.</p> <p>\$4⁹⁶</p>	<p>Bar S Bologna or Salami 16 oz.</p> <p>2/\$4</p>	<p>McCormick Grill-Mates Sausage Assorted Varieties 14 oz.</p> <p>2/\$7</p>
<p>Tyson Sliced Bacon 16 oz.</p> <p>2/\$11</p>	<p>Bar S Skinless Sausage 2.5 lb.</p> <p>2/\$10</p>	<p>Butterball Turkey Lunch Meat Assorted Varieties 16 oz.</p> <p>\$3⁹⁶</p>	<p>SRP Smoked Beef Bacon 16 oz.</p> <p>\$6⁹⁶</p>	<p>John Morrell Braunschweiler 16 oz.</p> <p>2/\$7</p>

FROZEN MEATS

<p>Tilapia Fillets 5 lb. bag</p> <p>\$18⁹⁶</p>	<p>Salmon Fillets 5 lb. bag</p> <p>\$21⁹⁶</p>	<p>Sea Best Hush Puppies 1 lb. bag</p> <p>2/\$6</p>	<p>Chuck Wagon Corn Dogs 2.5 lb.</p> <p>2/\$8</p>
<p>Steak-Umms Steak or Chicken 9 oz.</p> <p>\$3⁹⁶</p>	<p>TJ Farms Straight Cut Fries 1 lb.</p> <p>2/\$10</p>	<p>JTM Beef Philly Steak Kits 16 oz.</p> <p>\$11⁹⁶</p>	<p>Steak N Shake Steak Burgers 9.4 oz.</p> <p>2/\$10</p>
<p>Purnell's Sausage Patties 16 oz. or 3 lb.</p> <p>\$9⁹⁶</p>	<p>Williams Sausage Croissants 12 oz.</p> <p>2/\$9</p>	<p>Sager Creek Ready-to-Cook Tenderloins 3 lb.</p> <p>\$9⁹⁶</p>	<p>Happy Seas Breaded Shrimp 2 lb.</p> <p>\$12⁹⁶</p>
<p>Banquet Brown N Serve Links or Patties 6.4 oz.</p> <p>2/\$5</p>	<p>Dutch Farms Meatballs 3 lb.</p> <p>\$9⁹⁶</p>	<p>Johnsonville Grillers Assorted Varieties 24 oz.</p> <p>2/\$15</p>	



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

September 13, 2022

Matthew Schonert
22050 Boulder Ave
Eastpointe, MI 48021

Dear Mr. Schonert:

The Department of State received a response to the complaint you filed against Monique Owens, which concerns an alleged violation of the Michigan Campaign Finance Act (MCFA), 1976 P.A. 388, MCL 169.201 *et seq.* A copy of the response is provided as an enclosure with this letter.

If you elect to file a rebuttal statement, you are required to send it within 10 business days of the date of this letter to the Bureau of Elections, Richard H. Austin Building, 1st Floor, 430 West Allegan Street, Lansing, Michigan 48918.

Sincerely,

Adam Fracassi
Bureau of Elections
Michigan Department of State

c: Monique Owens

September 19, 2022

22050 Boulder Ave.
Eastpointe, Michigan 48021

Mr. Adam Fracassi
Bureau of Elections
Michigan Department of State
Richard H. Austin Building - First Floor
430 West Allegan St.
Lansing, Michigan 48918

Re: Schonert v. Owens (MCFA complaint no. 2022-06-25-226)

Dear Mr. Fracassi:

This letter is in response to your letter dated September 13, 2022, regarding Monique Owens' answer to complaint no. 2022-06-25-226. I hereby respectfully submit my rebuttal in this matter.

Allegation 1: Fundraiser Reporting

In Owens' answer, she claims that she scanned a statement at Office Depot and that it never reached the Elections Department.

The issue is not that Owens failed to file the October 2021 statement for her mayoral campaign committee. The problem is that she *did* file it yet did not truthfully report the activity occurring within the reporting period—in particular, by omitting contributions, contributor information, and fundraiser event information.

The Macomb County Clerk's records show that they did, in fact, receive an October 2021 quarterly statement from Owens on October 25, 2021. As stated in my original complaint, SUPPORTERS FOR MONIQUE OWENS filed an October 2021 quarterly statement, but it reported no contributions, contributor information, or fund raiser event information whatsoever. The October 2021 quarterly statement was untruthful in that it omitted the fact that Owens received contributions and held a fundraiser on August 15, 2021, which occurred during the reporting period covered by the statement.

The October 2021 Quarterly Statement for SUPPORTERS FOR MONIQUE OWENS filed with the Macomb County Clerk on October 25, 2021, is available at the URL below. (A copy was also attached to my original complaint.)

2022 OCT 11 PM 4:15
ELECTIONS/GREAT SEAL

Michigan Campaign Finance Complaint

Section 1. Complainant

Name: Matthew Ross Schonert

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

Mailing Address: 22050 Boulder Avenue, Eastpointe, Michigan 48021

Email: mrschonert@gmail.com

Section 2. Alleged Violator

Name: Monique Renee Owens

Mailing Address: 22480 Petersburg Avenue, Eastpointe, Michigan 48021

Email: moniqueowensforsenate@gmail.com

Section 3. Allegations

Sections of MCFA alleged to be violated:

- Section 26
 - Section 26(1)(e) — Failure to report direct contributions
 - Section 26(1)(e) — Failure to report in-kind contribution
 - Section 26(1)(e) — Failure to report contributors' full names
 - Section 26(1)(e) — Failure to report employers, occupations, and places of business of contributors who gave more than \$100
 - Section 26(1)(j) and Section 26(1)(d)(iv) — Failure to report expenditures
- Section 52(1)(b) — Accepting contributions in excess of the contribution limit

Explain how those sections were violated:

Background

1. Monique Owens was a candidate in the 2022 Michigan Senate Democratic primary in District 11, according to the Secretary of State's 2022 Michigan Candidate Listing: https://mielections.us/election/candlist/2022PRI_CANDLIST.html
2. Owens filed a statement of organization for a committee called SUPPORTERSFORMONIQUEOWENSFORSENATE (ID: 520696). Formed date: April 25, 2022. <https://cfrsearch.nictusa.com/committees/520696>

3. The committee's pre-primary statement received by the Department on August 9, 2022, reveals potential violations of multiple sections of the Michigan Campaign Finance Act.

In the pages that follow, I describe the alleged violations, grouping them by type of violation.

Explanation of Section 26 violations

1. Failure to report direct contributions

A GoFundMe fundraiser page titled "Supporters for Monique Owens for State Senator" and located at <https://www.gofundme.com/f/supporters-for-monique-owens-for-state-senator> shows that two contributions were received via the GoFundMe page. However, Owens' committee did not report any of these contributions on its pre-primary statement. The contributions are as follows:

- Kyla Washington - \$50
- Yvonne Thomas - \$150

Date of the GoFundMe contributions

The GoFundMe page does not state the precise dates when the contributions occurred, but the information on the page allows one to deduce that they likely took place within the reporting period for the pre-primary statement.

- As of September 28, 2022, the GoFundMe page described the contribution from Washington as having taken place "4 mos" ago, which means that the contribution likely took place in late May or early June 2022.
- As of September 28, 2022, the GoFundMe page described the contribution from Thomas as having taken place "3 mos" ago, which means that the contribution likely took place in late June or early July 2022.

The committee's pre-primary statement reported no contributions whatsoever from Kyla Washington, despite the committee's receipt of a \$50 donation via GoFundMe in May or June 2022. The failure to report this contribution is a violation of Section 26(1)(e).

The committee's pre-primary statement also did not report the \$150 contribution from Yvonne Thomas, despite the committee's apparent receipt of a \$150 contribution via GoFundMe. The pre-primary statement did report two contributions (\$900 on May 26 and \$950 on June 17) from Thomas but reported no contribution in the amount of \$150.

Therefore, it seems that the committee either failed to report Thomas' \$150 GoFundMe contribution individually (perhaps lumping it in with either the \$900 or \$950 contribution from Thomas) or failed to report it entirely, in violation of Section 26(1)(e).

The fundraiser page is still available at <https://www.gofundme.com/f/supporters-for-monique-owens-for-state-senator> as of September 28, 2022, and the donations are shown in the right column.

More information is available in the evidence section.

2. Failure to report in-kind contribution

On May 31, 2022, Yvonne Thomas paid \$150 to rent pavilions which were used to host Owens' June 16, 2022, barbecue fundraiser. Please refer to the evidence section for more information.

However, the committee did not report the payment of the pavilion rental fee as an in-kind contribution on its pre-primary campaign statement.

The committee should have reported Thomas's payment of the pavilion rental fee as an in-kind contribution. Its failure to do so constitutes a violation of Section 26(1)(e).

3. Failure to report contributors' full names

The committee's pre-primary statement reported at least three contributions in which the contributor's full name was not specified, in violation of Section 26(1)(e). For example:

- A contribution was reported from "Ford" which did not include the contributor's full name. The contributor name likely should have been reported as "Cassandra Ford".
- A contribution was reported from "Waltman" which did not include the contributor's full name.
- A contribution was reported from "Evans". This likely should have been reported as "Warren Evans" (if an individual contribution) or "Friends of Warren C. Evans" (if the contribution was from Evans' committee). I suspect that it should be the latter, based on the information on page 3 of the committee's July 22, 2022, inbound correspondence to the Secretary of State.

Section 26(1)(e) states that each individual contributor's full name must be reported. The committee's omission of contributors' full names constitutes a violation of Section 26(1)(e).

4. Failure to report employers and occupations of contributors who gave more than \$100

The committee's pre-primary statement reported cumulative contributions in excess of \$100 from each of the following contributors, but failed to report their occupations, employers, or principal places of business, in violation of Section 26(1)(e).

- Ford
- Waltman
- Anthony Bakko
- Yvonne Thomas
- Clint Pattah
- Stephanie Moulton

The omission of these contributors' occupations, employers, and places of business constitutes a violation of Section 26(1)(e).

In addition, there is evidence to support the possibility that Owens knowingly omitted these contributors' employers and occupations on her pre-primary statement. Please refer to the evidence section for more information.

5. Failure to report expenditures

Owens' committee failed to report a campaign expenditure entirely (food) and failed, at a minimum, to report another expenditure (website expenses) to the level of detail required by the Act. In addition, some itemized expenditures which the committee did report were not properly reported, as the committee failed to identify the vendors to whom the payments were made. These constitute violations of Section 26(1)(j).

a. Expenditure: Website hosting and domain registration

Owens' senate campaign had a website at <https://www.moniqueowensforsenate.org> during the months leading up to the primary. (The website has since been taken down, but I know that the site was active as early as mid-June 2022 and remained accessible until at least September 2, 2022.)

Owens' website made use of features that the apparent hosting provider, Wix.com, only provides to paid users. Based on this, it is reasonable to conclude that payments were made to Wix.com by the committee or on its behalf.

Despite this, the committee did not report any expenditures paid to Wix.com for website hosting.

The pre-primary statement did report a \$600 expenditure paid to Monique Owens (the candidate) for "MARKETING" but did not itemize the specific vendor(s), if applicable, to whom payments

were made. In addition, no indication was given as to whether the goods or services were provided "in house" or otherwise.

In fact, all of the direct expenditures reported on the pre-primary statement are described as having been paid to the candidate, without specifying the actual vendor(s) to whom those payments were made. All of those expenditures were described as having exceeded \$50.

Pre-Primary CS Schedule 1B:

<https://cfrsearch.nictusa.com/documents/529450/details/filing/expenditures?schedule=1B&changes=0&page=1>

b. Expenditure: Food for barbecue fundraiser

The pre-primary statement also reported a fundraiser which took place on June 16, 2022. The event was described on the fundraiser schedule as a barbecue, but the statement did not report any expenditures for food. The statement also did not report any in-kind contributions of food.

c. Expenditure: Miscellaneous

As noted above, all of the direct expenditures reported on the pre-primary statement are described as having been paid to the candidate, without specifying the actual vendor(s) to whom those payments were made. All of those expenditures were described as having exceeded \$50.

To give an example, the pre-primary statement reported an expenditure for a "POST OFFICE MAILING ADDRESS", which was described as paid to the candidate. The payee should have been described as "United States Postal Service" or something similar, to indicate the vendor to whom payment was made.

Summary of failure to report expenditure information

In summary, the committee's failure to report an expenditure for food for the barbecue event, as well as its failure to properly report an expenditure for website hosting services, as well as its failure to report vendor names and addresses for the expenditures it did report, constitute violations of Section 26(1)(j).

The failure to report the total cost of the barbecue event may also constitute a violation of Section 26(1)(d).

Furthermore, there is reason to believe that Owens knowingly violated Sections 26(1)(j) and 26(1)(d)(iv) of the Act.

- Section 26(1)(j) — Owens has run for office several times and has been specifically advised by filing officials (specifically, the Macomb County Clerk) of the reporting

requirements of Schedule 1B on multiple occasions. (See the evidence section for examples.)

- Section 26(1)(d)(iv) — The Bureau of Elections, in a July 19, 2022, letter related to Campaign Finance Complaint No. 2022-06-25-226, had notified Owens of the need to report expenditures incident to a fundraiser on campaign statements.

Explanation of Section 52 violations

6. Accepting contributions in excess of the individual contribution limit

I suspect that Owens' committee accepted contributions in excess of the limit from Yvonne Thomas.

The committee's pre-primary statement reported receiving two direct contributions from Thomas in the amount of \$900 and \$950—a cumulative total of \$1,850 thus far.

Thomas also made the following contributions, which the committee apparently failed to report:

- \$150 direct contribution via GoFundMe page
- \$150 in-kind contribution (payment of pavilion rental fee to RARE)

(For more information about these contributions, refer to Section 3, items 1 and 2, of my complaint.)

If these contributions are in addition to the \$1,850 cumulative direct contributions already reported by the committee, then the new cumulative amount of individual and in-kind contributions would become \$2,150.

The individual contribution limit for a state senate candidate in 2022 appears to be \$2,100. <https://mertsplus.com/mertsuserguide/index.php?n=MANUALS.StateLevelOffices>

If Owens' committee received direct contributions of \$900, \$950, and \$150, plus an in-kind contribution of \$150 from Yvonne Thomas, then those contributions cumulatively exceed the Act's contribution limit for the a state senate candidate, in violation of Section 52(1)(b).

Please refer to the evidence section for more information about this allegation.

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

Evidence of Section 26 violations

1. Evidence of failure to report direct contributions (GoFundMe fundraiser)

The screenshot shows a GoFundMe page for a fundraiser titled "Supporters for Monique Owens for State Senator". The main graphic features the name "Monique OWENS" in large, bold letters, with "FOR STATE SENATOR" and "MICHIGAN WINS WITH OWENS" below it. The GoFundMe logo is in the top right corner. The page shows that \$200 has been raised out of a \$100,000 goal, with 2 donations listed. The first donation is from Yvonne Thomas for \$150, 2 months ago. The second donation is from Kyiah Washington for \$50, 3 months ago. There are buttons for "Share" and "Donate now". A note at the bottom left states "Monique Owens is organizing this fundraiser."

gofundme.com

Search How it works Start a GoFundMe

gofundme

Sign in Share Donate

Supporters for Monique Owens for State Senator

Monique OWENS
FOR STATE SENATOR
MICHIGAN WINS WITH OWENS

Monique Owens is organizing this fundraiser.

\$200 raised of \$100,000 goal
2 donations

Share

Donate now

This fundraiser is located near you

Yvonne Thomas
\$150 · 2 mos

Kyiah Washington
\$50 · 3 mos

Become an early supporter
Your donation matters

Close up screenshot (taken September 28, 2022):

\$200 raised of \$100,000 goal

2 donations

Share

Donate now



This fundraiser is located near you



Yvonne Thomas

\$150 = 3 mos



Kylah Washington

\$50 = 4 mos



Become an early supporter

Your donation matters

GoFundMe protects your donation

We guarantee you a full refund for up to a year in the rare case that fraud occurs. [See our GoFundMe Giving Guarantee.](#)

PRE PRIMARY CS ITEMIZED DIRECT CONTRIBUTIONS:

The committee's pre-primary statement, schedule 1A, does not report a \$150 contribution from Yvonne Thomas.

<https://cfrsearch.nictusa.com/documents/529450/details/filing/contributions?schedule=1A&changes=0&page=1>

2. Evidence of failure to report in-kind contribution (pavilion rental)

The Recreation Authority of Roseville and Eastpointe (RARE) has on file a pavilion rental permit and receipt showing that Yvonne Thomas paid \$150 on May 31 to rent the East and West Pavilions at Kennedy Park (in Eastpointe) from 4–9 p.m. on June 16, 2022. This document is attached to the complaint.

The committee failed to report Yvonne Thomas’s payment of the pavilion rental fee as an in-kind contribution on its pre-primary statement. See schedule IK, which reports no in-kind contributions from Thomas:

<https://cfrsearch.nictusa.com/documents/529450/details/filing/contributions?schedule=IK&changes=0&page=1>

Again, Owens *did* report direct contributions in the amount of \$900 and \$950 from Thomas, but the payment of the pavilion rental should be reported as a separate \$150 contribution. In addition, it should be listed as in-kind, not direct.

Further evidence that an Owens fundraiser was held at the venue rented by Thomas

Owens reported in her pre-primary campaign statement that her campaign held a fundraiser at “JFK PARK” on June 16, 2022—the same date for which Thomas had reserved the pavilions at Kennedy Park. (The full name of the park is John F. Kennedy Memorial Park.)

Multiple public Facebook posts from Cassandra Ford promoted a barbecue fundraiser to be held at the East and West Pavilions from 5–8 p.m. on June 16, 2022, which coincides with the rental time period shown on the documents obtained from RARE. Some of the Facebook posts included a photo of a flier advertising the fundraiser which also mentioned the June 16, 2022, date and listed “Yvonne N Thomas” (the pavilion renter) as a contact person. Screenshots of two posts are included below along with URLs.

URL:

<https://www.facebook.com/cassandra.ford.37/posts/pfbid08U82E7qe8JFFtcvn9V5zuc6p11u316CF5LeLmA5J9yNyMMRJ71mCSpX9SpFfRPnNl>

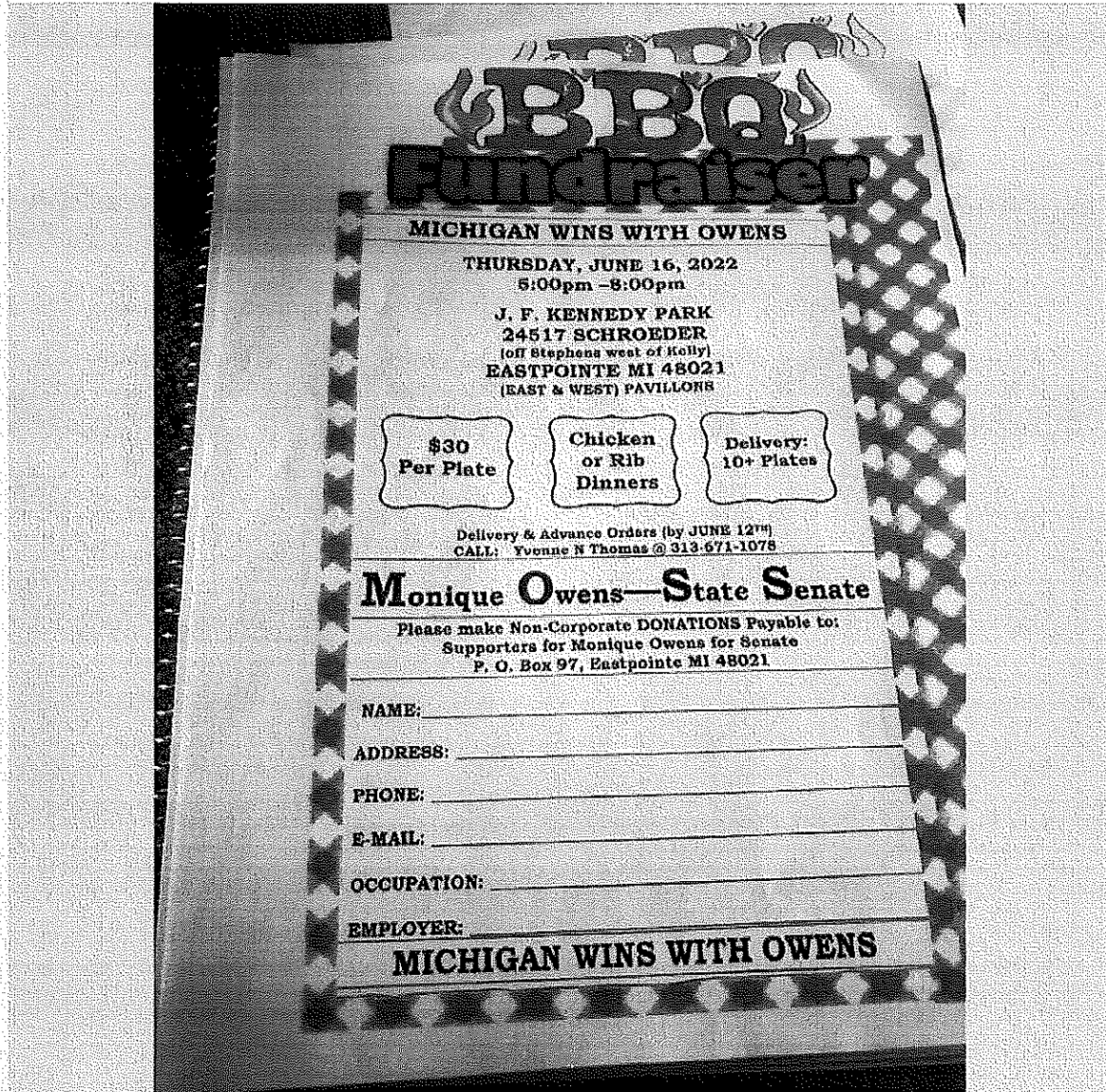


Cassandra Ford is in Eastpointe, Michigan.

June 14 · 🌐

...

She a Democrat running in Distict 11



2 Shares

In addition, on the date of the fundraiser (June 16) at about 9:15 p.m., I personally witnessed a yard sign at the intersection of Kelly Road and Stephens Road in Eastpointe. On the sign, "Owens fundraiser" was hand written, along with an arrow pointing west, toward Kennedy Park. I took the following photo of the sign on June 17 at 7:34 a.m., the morning after the fundraiser.



In summary, the above evidence supports my assertion that Yvonne Thomas paid for a pavilion rental used for Owens' June 16, 2022, fundraiser and that the committee failed to report the payment of the rental fee as an in-kind contribution, in violation of the Section 26(1)(e) of the Act.

3. Evidence of failure to report contributors' full names and street addresses

Please refer to the committee's pre-primary campaign statement, which was filed with the Secretary of State on August 9, 2022. An excerpt is included below.

Receiving Committee	Committee ID-Type	Schedule Type	Description	Received From	City State Zip	Date	Amount
SUPPORTERSFORMONIQUEOWENSFORSENATE	520696-CAN	DIRECT		MONIQUE OWENS P.O. BOX 97 MAYOR CITY OF EASTPOINTE	EASTPOINTE MI 48021	07/17/2022	\$4,500.00
SUPPORTERSFORMONIQUEOWENSFORSENATE	520696-CAN	DIRECT		FORD 18510 JULIANNA	EASTPOINTE MI 48021	06/16/2022	\$1,000.00
SUPPORTERSFORMONIQUEOWENSFORSENATE	520696-CAN	DIRECT		WALTMAN P.O. BOX 59	ROSEVILLE MI 48066	07/07/2022	\$1,000.00
SUPPORTERSFORMONIQUEOWENSFORSENATE	520696-CAN	DIRECT		ANTHONY BAKKO 4835 FAIRVIEW CT	BLOOMFIELD MI 48322	06/17/2022	\$1,000.00
SUPPORTERSFORMONIQUEOWENSFORSENATE	520696-CAN	DIRECT		YVONNE THOMAS 17416 COLLINSON	EASTPOINTE MI 48021	06/17/2022	\$950.00
SUPPORTERSFORMONIQUEOWENSFORSENATE	520696-CAN	DIRECT		YVONNE THOMAS 17416 COLLINSON	EASTPOINTE MI 48021	05/26/2022	\$900.00
SUPPORTERSFORMONIQUEOWENSFORSENATE	520696-CAN	INKIND	CAMPAIGN LOGO	CLINT PATTAH 18801 E. 9 MILE	EASTPOINTE MI 48021	06/01/2022	\$200.00
SUPPORTERSFORMONIQUEOWENSFORSENATE	520696-CAN	DIRECT		STEPHANIE MOULTON 75 KING STREET	MIL VALLEY CA 94941	07/03/2022	\$145.51
SUPPORTERSFORMONIQUEOWENSFORSENATE	520696-CAN	DIRECT		CLINT PATTAH 18801 E. 9 MILE	EASTPOINTE MI 48021	07/17/2022	\$100.00
SUPPORTERSFORMONIQUEOWENSFORSENATE	520696-CAN	DIRECT		EVANS 18925 PARKSIDE	DETROIT MI 48214	05/26/2022	\$100.00

Close up screenshot of contributions where the contributor's full name was not reported:

FORD
18510
JULIANNA

WALTMAN
P.O. BOX 59

EVANS
18925
PARKSIDE

This evidence supports my allegation that the committee failed to report contributors' full names, in violation of Section 26(1)(e).

4. Evidence of failure to report employers and occupations of contributors who gave more than \$100

Please refer to the committee's pre-primary campaign statement, which was filed with the Secretary of State on August 9, 2022.

URL:

https://cfrsearch.nictusa.com/documents/529450/details/filing/contributions?schedule=*%&changes=0&page=1

Screenshot taken September 28, 2022:

Receiving Committee	Committee ID-Type	Schedule Type	Description	Received From	City State Zip	Date	Amount
SUPPORTERSFORMONIQUEOWENSFORSENATE	520696-CAN	DIRECT		MONIQUE OWENS P.O. BOX 97 MAYOR CITY OF EASTPOINTE	EASTPOINTE MI 48021	07/17/2022	\$4,500.00
SUPPORTERSFORMONIQUEOWENSFORSENATE	520696-CAN	DIRECT		FORD 18510 JULIANNA	EASTPOINTE MI 48021	06/16/2022	\$1,000.00
SUPPORTERSFORMONIQUEOWENSFORSENATE	520696-CAN	DIRECT		WALTMAN P.O. BOX 59	ROSEVILLE MI 48066	07/07/2022	\$1,000.00
SUPPORTERSFORMONIQUEOWENSFORSENATE	520696-CAN	DIRECT		ANTHONY BAXKO 4835 FAIRVIEW CT	BLOOMFIELD MI 48322	06/17/2022	\$1,000.00
SUPPORTERSFORMONIQUEOWENSFORSENATE	520696-CAN	DIRECT		YVONNE THOMAS 17416 COLLINSON	EASTPOINTE MI 48021	06/17/2022	\$950.00
SUPPORTERSFORMONIQUEOWENSFORSENATE	520696-CAN	DIRECT		YVONNE THOMAS 17416 COLLINSON	EASTPOINTE MI 48021	05/26/2022	\$900.00
SUPPORTERSFORMONIQUEOWENSFORSENATE	520696-CAN	INKIND	CAMPAIGN LOGO	CLINT PATIAH 18801 E. 9 MILE	EASTPOINTE MI 48021	06/01/2022	\$200.00
SUPPORTERSFORMONIQUEOWENSFORSENATE	520696-CAN	DIRECT		STEPHANIE MOULTON 75 KING STREET	MIL VALLEY CA 94941	07/03/2022	\$145.51

For nearly all of the individuals who cumulatively contributed more than \$100, no occupation, employer, or principal place of business were reported.

The above evidence supports my allegation that the committee violated Section 26(1)(e) by not reporting occupation and employer information when required to do so.

In addition, there is evidence to support the possibility of a knowing violation. The 2022 state senate race was, at a minimum, Owens' third time running for elected office. By the time of the filing of the pre-primary statement, Owens had been made aware of the Act's requirements for individual contributions over \$100. For example, an errors and omissions notice from the

Macomb County Clerk dated November 7, 2019, had advised her mayoral campaign committee that occupation and employer information was required for a \$150 individual contribution made by Stanley Grot. See page 2 of <https://campaignfinance.us/docs.macomb.mi/470874103.pdf> (A copy of the relevant page is enclosed.)

5. Evidence of failure to report expenditures

Owens' website domain, moniqueowensforsenate.org, was mentioned in a candidate survey article dated July 13, 2022, in the *Warren Weekly* at <https://www.candnews.com/news/primary-election-set-for-aug-2-276> (A copy of the relevant pages from the survey is enclosed at the end of this complaint.)

Please refer to the committee's pre-primary campaign statement, which was received by the Secretary of State on August 9, 2022, and note that the expenditures schedule does not mention any expenditures for a website.

In-kind contributions:

<https://cfrsearch.nictusa.com/documents/529450/details/filing/contributions?schedule=IK&changes=0&page=1>

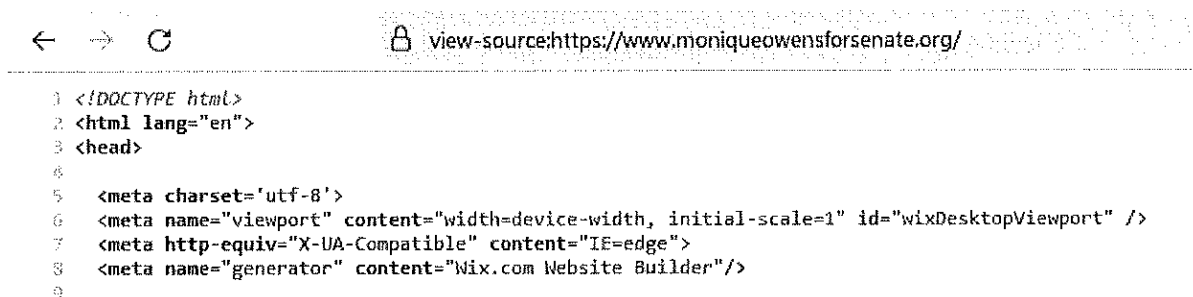
Expenditures:

https://cfrsearch.nictusa.com/documents/529450/details/filing/expenditures?schedule=*&changes=0&page=1

A metadata tag in the source code of the website suggested that it was built using wix.com:

```
<meta name="generator" content="Wix.com Website Builder"/>
```

Screenshot of source code:



According to pricing information on wix.com, Wix's free service plan does not include the use of custom domain names (such as moniqueowensforsenate.org) and also would require the site to carry advertisements. Use of a custom domain or ad-free hosting requires payment.

Comparison of free vs. premium Wix.com plans:
<https://support.wix.com/en/article/free-vs-premium-site>

Owens' site did use a custom domain name (moniqueowensforsenate.org) and did not contain ads. These features are not available on Wix's free plan. This suggests that the site was hosted using a paid plan and that expenditures were made to Wix.com by Owens or on her behalf. If so, this would constitute a violation of Section 26(1)(j) for failing to report an expenditure.

In addition, the Itemized Direct Expenditures schedule on the pre-primary statement shows that all expenditures were paid to "Monique Owens", the candidate. This cannot be accurate. For instance, the May 1, 2022, payment for a post office box is described as being paid to Owens, when it was likely paid to the United States Postal Service instead.

As written, the schedule gives the impression that Owens personally manufactured all of the campaign materials purchased by the campaign, such as signs, fliers, envelopes, and magnets. The committee must report the names and addresses of the vendors who provided these goods and services. However, it failed to do so.

Committee Making Expenditure	Committee ID-Type	Schedule Type	Payee	Expense Date	Exp Code	Purpose	Amount or Value	Supp
SUPPORTERSFORMONIQUEOWENSFORSENATE	520696-CAN	DIRECT	MONIQUE OWENS P.O. BOX 97 EASTPOINTE, MI 48021	05/01/2022		STAMPS	\$6,800.00	
SUPPORTERSFORMONIQUEOWENSFORSENATE	520696-CAN	DIRECT	MONIQUE OWENS P.O. BOX 97 EASTPOINTE, MI 48021	05/01/2022		MAGNETS	\$1,100.00	
SUPPORTERSFORMONIQUEOWENSFORSENATE	520696-CAN	DIRECT	MONIQUE OWENS P.O. BOX 97 EASTPOINTE, MI 48021	05/01/2022		PRINTING	\$1,000.00	
SUPPORTERSFORMONIQUEOWENSFORSENATE	520696-CAN	DIRECT	MONIQUE OWENS P.O. BOX 97 EASTPOINTE, MI 48021	05/01/2022		HALL RENTAL	\$600.00	
SUPPORTERSFORMONIQUEOWENSFORSENATE	520696-CAN	DIRECT	MONIQUE OWENS P.O. BOX 97 EASTPOINTE, MI 48021	05/01/2022		MARKETING	\$600.00	
SUPPORTERSFORMONIQUEOWENSFORSENATE	520696-CAN	DIRECT	MONIQUE OWENS P.O. BOX 97 EASTPOINTE, MI 48021	05/01/2022		FLIERS	\$550.00	
SUPPORTERSFORMONIQUEOWENSFORSENATE	520696-CAN	DIRECT	MONIQUE OWENS P.O. BOX 97 EASTPOINTE, MI 48021	05/01/2022		ENVELOPES	\$500.00	
SUPPORTERSFORMONIQUEOWENSFORSENATE	520696-CAN	DIRECT	MONIQUE OWENS P.O. BOX 97 EASTPOINTE, MI 48021	05/01/2022		LAWN SIGNS	\$450.00	
SUPPORTERSFORMONIQUEOWENSFORSENATE	520696-CAN	DIRECT	MONIQUE OWENS P.O. BOX 97 EASTPOINTE, MI 48021	05/01/2022		PHOTOS	\$80.00	
SUPPORTERSFORMONIQUEOWENSFORSENATE	520696-CAN	DIRECT	MONIQUE OWENS P.O. BOX 97 EASTPOINTE, MI 48021	05/01/2022		POST OFFICE MAILING ADDRESS	\$60.00	

Matches 1 - 10 of 10

Evidence supporting that Section 26(1)(j) was knowingly violated

The Macomb County Clerk's office had informed Owens on numerous occasions that names and addresses of vendors must be reported on Schedule 1B of a campaign statement. For evidence, please refer to the following error and omission notices on file with the Macomb County Clerk. (Copies of the relevant pages are also attached at the end of this complaint.)

- Dec. 14, 2020: <https://campaignfinance.us/docs.macomb.mi/470884121.pdf> (see page 2)
- Sept. 29, 2020: <https://campaignfinance.us/docs.macomb.mi/470881860.pdf> (see page 3)

- Jan. 2, 2020: <https://campaignfinance.us/docs.macomb.mi/470875221.pdf> (see page 3)

Evidence supporting that Section 26(1)(d)(iv) was knowingly violated

I have enclosed a copy of the bureau's July 19, 2022, letter related to Campaign Finance Complaint No. 2022-06-25-226, in which Owens was notified that her committee must report expenditures incident to a fundraiser on campaign statements.

Evidence of Section 52 violations

6. Evidence of accepting contributions in excess of the individual contribution limit

Yvonne Thomas made the following contributions:

- \$900 direct contribution dated 5/26/2022 (reported by committee on pre-primary CS)
- \$950 direct contribution dated 6/17/2022 (reported by committee on pre-primary CS)
- \$150 direct contribution via GoFundMe in late June / early July 2022 (not reported by committee)
- \$150 in-kind contribution of pavilion rental in or prior to June 2022 (not reported by committee)

Cumulative contributions from Yvonne Thomas: \$2,150

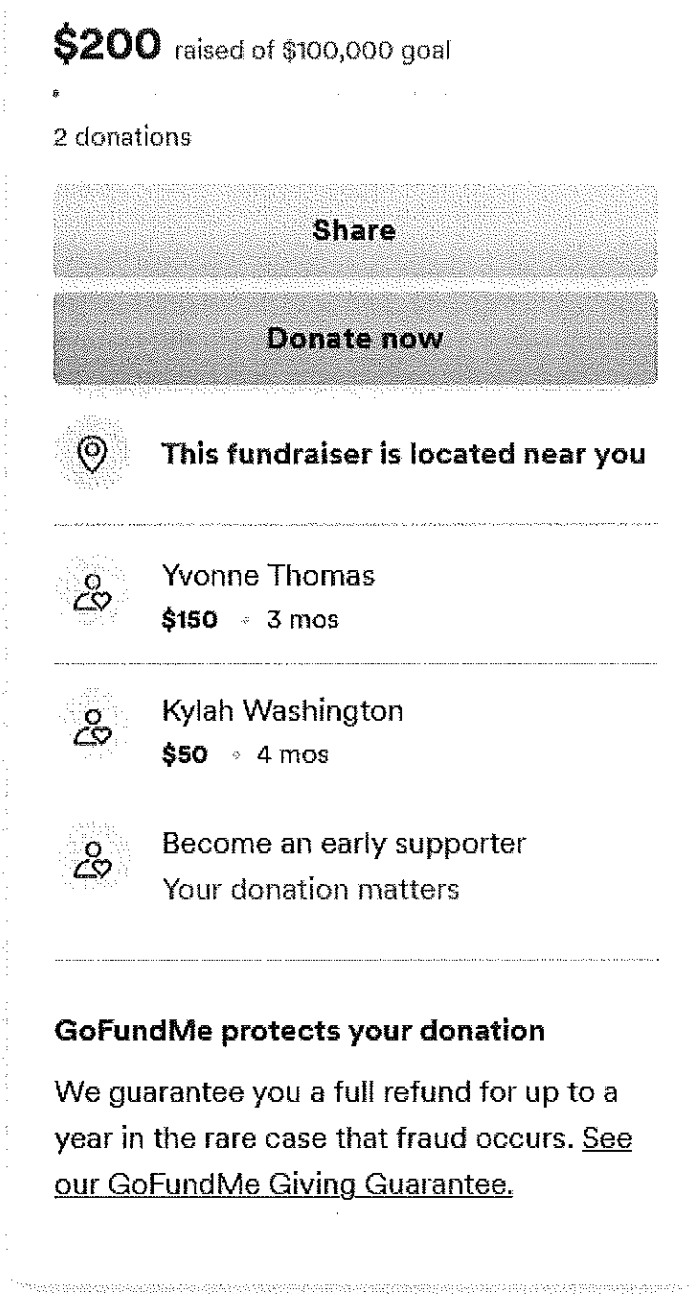
Direct contributions reported on pre-primary statement (emphasis added):

Receiving Committee	Committee ID-Type	Schedule Type	Description	Received From	City State Zip	Date	Amount
SUPPORTERSFORMONIQUEOWENSFORSENATE	520696-CAN	DIRECT		MONIQUE OWENS P.O. BOX 97 MAYOR CITY OF EASTPOINTE	EASTPOINTE MI 48021	07/17/2022	\$4,500.00
SUPPORTERSFORMONIQUEOWENSFORSENATE	520696-CAN	DIRECT		ANTHONY BANKO 4835 FAIRVIEW CT	BLOOMFIELD MI 48322	06/17/2022	\$1,000.00
SUPPORTERSFORMONIQUEOWENSFORSENATE	520696-CAN	DIRECT		FORD 18510 JULIANNA	EASTPOINTE MI 48021	06/16/2022	\$1,000.00
SUPPORTERSFORMONIQUEOWENSFORSENATE	520696-CAN	DIRECT		WALTMAN P.O. BOX 59	ROSEVILLE MI 48066	07/07/2022	\$1,000.00
SUPPORTERSFORMONIQUEOWENSFORSENATE	520696-CAN	DIRECT		YVONNE THOMAS 17416 COLLINSON	EASTPOINTE MI 48021	06/17/2022	\$950.00
SUPPORTERSFORMONIQUEOWENSFORSENATE	520696-CAN	DIRECT		YVONNE THOMAS 17416 COLLINSON	EASTPOINTE MI 48021	05/26/2022	\$900.00

URL:

<https://cfrsearch.nictusa.com/documents/529450/details/filing/contributions?schedule=1A&changes=0&page=1>

GoFundMe fundraiser page close up screenshot (taken September 28, 2022):

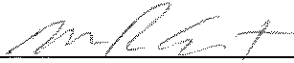


URL: <https://www.gofundme.com/f/supporters-for-monique-owens-for-state-senator>

The receipt from RARE showing the pavilion rental paid for by Thomas is attached at the end of this complaint.

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  10/04/2022
Signature of Complainant Date

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

If, after a reasonable inquiry under the circumstances, you are unable to certify that certain factual contentions are supported by evidence as indicated above, you may make the following certification:

I certify that to the best of my knowledge, information, or belief, there are grounds to conclude that the following specifically identified factual contentions are likely to be supported by evidence after a reasonable opportunity for further inquiry. Those specific contentions are:

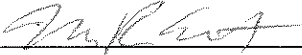
7. I suspect that contributions from multiple people were reported as a single contribution from “Ford”—a likely reference to Cassandra Ford, who promoted Owens’ barbecue fundraiser on Facebook. If the committee failed to report contributions individually and include all required information, that would constitute a violation of Section 26(1)(e). Owens’ pre-primary statement reported a fundraiser held on June 16, 2022, saying that it was attended by 10 people and raised \$1,100. The committee also reported a \$1,000 contribution taking place June 16 (the day of the fundraiser) from Ford. The pre-primary statement’s itemized direct contributions schedule only includes a total 19 contributions occurring during the range covered by the statement. Of those 19 contributions, three of them are less than the advertised \$30 per plate price for the barbecue fundraiser. There is not enough information available to the public to allow one to conclude that the committee failed to report some fundraiser contributions or attributed them to someone other than the actual contributor. However, the information given raises concerns about the accuracy of the reporting and may warrant further inquiry by the Department.

8. On the pre-primary statement, for at least two contributors, the committee reported street addresses which do not appear to be home or residential addresses. Section 26(1)(e) requires reporting of contributors’ street addresses, but the Act

does not, to my knowledge, define the term “street address” or explicitly state that street address must be the contributor’s residence. I suspect that the use of non-residential addresses constitutes a violation of Section 26(1)(e) but am not certain. I trust that the Department can determine if the following contributor addresses meet the requirements or not.

- Clint Pattah’s street address was reported as 18801 E. 9 MILE, EASTPOINTE MI 48021. This is the address of Fresh Choice Market Place, a supermarket.
- Eric Lloyd’s street address was reported as 20531 KELLY RS, HARPERWOODS MI 48225. This is the address of Rhema International Church.

X



Signature of Complainant

10/04/2022
Date

Section 6. Submission

This complaint is hereby submitted to:

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

 SearchHow it
works Start a
GoFundMeSign
in[Share](#)[Donate](#)

Supporters for Monique Owens for State Senator



\$200 raised of
\$100,000 goal

[Share](#)[Donate now](#)

Monique Owens is organizing this fundraiser.

My name is Monique Owens, and I am proudly announcing my candidacy for State Senator(D) for the 11th District. I never grew up in politics, but one day God opened my eyes to the things around me and helped me pay attention to those making the decisions for communities. This vision made me want to take steps to make a change not only for my family but for yours too.

I believe I can do more at the State level. By improving

[Read more](#)

Yvonne
Thomas
\$150 • 3 mos



Kylah
Washington
\$50 • 4 mos



Become an
early
supporter
Your donation
matters

GoFundMe
protects your
donation

[Donate](#)[Share](#)

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Organizer

**Monique Owens**

Organizer

Eastpointe, MI

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Recreation Authority of Roseville and
Eastpointe

18185 Sycamore, Roseville, MI 48066

586-445-5480

rare-mi.org

PERMIT #2346

Authorized On: 05/31/2022 10:12 AM

NOTE: Rental

Location

Kennedy Park
24517 Schroeder
Eastpointe, MI 48066

Permit Holder

Yvonne Thomas
~~586-445-5480~~
Eastpointe, MI 48021
~~586-445-5480~~

Authorized Agent

Amanda Hughes
586-445-5480
ahughes@rare-mi.org
rare-mi.org

RESERVATIONS

Location	Facility	Date	Time	Hours	Fee
Kennedy Park	East Pavilion	Thu, Jun 16th 2022	04:00 PM-09:00 PM	5.00	\$75.00
Kennedy Park	West Pavilion	Thu, Jun 16th 2022	04:00 PM-09:00 PM	5.00	\$75.00
TOTAL:					\$150.00

CHARGES

LOCATION	FACILITY	DESCRIPTION	TOTAL	PAID	BALANCE DUE
Kennedy Park	East Pavilion	Jun 16, 2022 4:00 PM-9:00 PM	\$75.00	\$75.00	\$0.00
Kennedy Park	West Pavilion	Jun 16, 2022 4:00 PM-9:00 PM	\$75.00	\$75.00	\$0.00
TOTAL:			\$150.00	\$150.00	\$0.00

PAYMENTS

RECEIPT #	DATE/TIME	DESCRIPTION	AMOUNT
39332090	05/31/2022 10:12 AM	Check (#6863)	\$150.00
TOTAL:			\$150.00

PROMPT RESPONSES

Location	Facilities	Date	Days
Kennedy Park	East Pavilion	06/16/2022	Thu

#1 - Please input drivers license or State ID number including first letter

Response: ~~XXXXXXXXXX~~

Kennedy Park	West Pavilion	06/16/2022	Thu
--------------	---------------	------------	-----

#2 - Please input drivers license or State ID number including first letter

Response: n/a

Kennedy Park	East Pavilion West Pavilion	06/16/2022	Thu
--------------	--------------------------------	------------	-----

#3 - If you would like to rent our Party Game Kits for your rental, please list games (3):

Response:

Kennedy Park	East Pavilion	06/16/2022	Thu
--------------	---------------	------------	-----

#4 - How many guests do you anticipate on having at your event?

Response: 150

Kennedy Park	West Pavilion	06/16/2022	Thu
--------------	---------------	------------	-----

#5 - How many guests do you anticipate on having at your event?

Response: w/East half of pavilion

Kennedy Park	East Pavilion	06/16/2022	Thu
--------------	---------------	------------	-----

#6 - What type of event are you having?

Response: Family and Friends affair

Kennedy Park	West Pavilion	06/16/2022	Thu
--------------	---------------	------------	-----

#7 - What type of event are you having?

Response: w/East half of pavilion



Recreation Authority of Roseville and Eastpointe

18185 Sycamore, Roseville, MI 48066

586-445-5480

rare-mi.org

Registration/Payment Receipt 39332090

05/31/2022 10:12 AM

Account Information

Yvonne Thomas

~~9500220000000000~~

Eastpointe, MI 48021 United

States

~~586-445-5480~~

Payment

Check

\$150.00

(#6863)

Received By

Amanda Hughes at Recreation Authority
Center

Item	Amount Paid
Kennedy Park East Pavilion Jun 16, 2022 4:00 PM-9:00 PM - Resident Hourly Rate: \$15/Hour - PERMIT #2346	\$75.00
Kennedy Park West Pavilion Jun 16, 2022 4:00 PM-9:00 PM - Resident Hourly Rate: \$15/Hour - PERMIT #2346	\$75.00
Subtotal	\$150.00
Total Payment	\$150.00

Prompt(s)

What type of event are you having? Family and Friends affair

How many guests do you anticipate on having at your event? 150

If you would like to rent our Party Game Kits for your rental, please list games (3):

What type of event are you having? w/East half of pavilion

How many guests do you anticipate on having at your event? w/East half of pavilion

If you would like to rent our Party Game Kits for your rental, please list games (3):

Facility Notes

Kennedy Park East Pavilion

Park address: 24517 Schroeder

Eastpointe, MI 48021

Please direct any questions to ahughes@rare-mi.org

Kennedy Park West Pavilion

Park address: 24517 Schroeder

Eastpointe, MI 48021

Waiver(s)

Pavilion Rental

Liability Waiver:

I hereby made this application for the use of a Park Pavilion within the cities of Eastpointe or Roseville. I certify that the information on the application is true and I have read and agree to abide by the rental policy pertaining to the use of the Pavilion/Gazebo as adopted by the Recreation Authority of Roseville & Eastpointe. I also agree to the fee charged, and shall be responsible pertaining to the use of the facility in accordance with the rental policy. I further agree to indemnify, defend and save harmless the Recreation Authority of Roseville & Eastpointe, its officers, agents and employees from and against all loss or expense (including costs and attorney fees) by reason of liability imposed by law upon the Recreation Authority of Roseville & Eastpointe, its officers, agents, and employees for damages to property, including loss of use thereof, arising out of or in consequence of the performance of this application, whether such injuries to persons or damage to property is due or claimed to be due to the negligence of the contractor, the Recreation Authority of Roseville & Eastpointe, its officers, agents and employees, excepting only such injury or damage as shall have been occasioned by the sole negligence of the Recreation Authority of Roseville & Eastpointe, its officers, agents and employees. "I agree that I shall be responsible for all actions of my guests or participants and explicitly acknowledge that the Recreation Authority of Roseville & Eastpointe is not responsible for the supervision of my guests or participants."

PAVILION RULES & POLICIES FOR EASTPOINTE & ROSEVILLE PARKS:

****This receipt acts as your permit for the facility rented. Please have it with you at your event.****

PARK USAGE: Permits are done on a first come first serve basis. Reserving a pavilion gives the renter exclusive use of the pavilion during designated reservation period. Kennedy Park Large (East & West) Pavilion hosts two separate rentals under the same pavilion.

RENTAL TIME: Rentals are for a minimum 5-hour period between the hours of 10:00am – 8:00pm for the months of May and September, and 10:00am - 9:00pm for the months of June-August. During the months of May and September rental dates must be on a Saturday, Sunday or official Holiday. Additional hours may be purchased if needed prior to the rental date, at least 3 weeks in advance.

CANCELLATION POLICY: Reservations cancelled at least 5 business days (Monday - Friday) in advance will be assessed a \$20 processing fee. Refunds will not be given due to inclement weather. Reservation date may be rescheduled, prior to the reservation date (Monday - Friday), at no additional charge, pending availability. Refund may take 3-4 weeks to process and will be mailed to the contact address directly.

CLEAN-UP: Pavilion area must be left in a clean and orderly condition upon departure. Trash receptacles are provided to all park goers. At the end of your event notify the park staff before departure.

ITEMS/SERVICES NOT PERMITTED: DJ's, bands, glass, ground fires, fireworks, fryers, marijuana or vehicles are NOT permitted on park grounds. Beer/Wine IS permitted in Eastpointe Parks; Beer/Wine IS NOT permitted in Roseville Parks per city ordinance. Alcohol is NOT permitted in any park at any time.

ENTERTAINMENT POLICY: Additional entertainment such as inflatables, petting farms, pony rides, trains, dunk tanks, gaming trucks, concession items and tent/tables/chairs are NOT permitted for rentals. Entertainers such as clowns, magicians, face painters or characters ARE permitted for rentals. A notice of entertainers is appreciated, but not required. A personal tent (10x10 or 12x12) and camping type chairs are permitted to be brought by party.

DAY OF EVENT: Responsible party (contract holder) MUST be on-site for the entire rental, the pavilion will not be available until the renter arrives. Additional names may not be added to the contract.

THE RECREATION AUTHORITY RESERVES THE RIGHT TO CANCEL OR ALTER YOUR RESERVATION. "I AGREE THAT I SHALL BE RESPONSIBLE FOR ALL ACTIONS OF MY GUESTS OR PARTICIPANTS AND EXPLICITLY ACKNOWLEDGE THAT THE RECREATIONAL AUTHORITY OF

ROSEVILLE & EASTPOINTE IS NOT RESPONSIBLE FOR THE SUPERVISION OF MY GUESTS OR PARTICIPANTS.

BY SIGNING THIS CONTRACT, I UNDERSTAND THAT I AM RESPONSIBLE FOR THIS EVENT RENTAL. I AM PERSONALLY RESPONSIBLE TO BE ON-SITE DURING THE ENTIRE RENTAL PERIOD. IF ANY ISSUES ARISE DURING MY RENTAL, THE RECREATION AUTHORITY STAFF MEMBERS WILL ADDRESS THEM WITH ME DIRECTLY. I AGREE TO THE TERMS OF THE CONTRACT AND UNDERSTAND THAT THE RECREATION AUTHORITY HAS THE RIGHT TO REFUSE FUTURE RENTALS IF DEEMED NECESSARY DUE TO CONTRACT VIOLATIONS.

Signature

Date

Thank you for registering with Recreation Authority of Roseville and Eastpointe, MI

Cover Page:

The coverage period for your statement (Item #3) should be 7/15/19 to 10/20/19 and all transactions that occurred during that time should be reported. Please clarify.

Summary Page:

Line 6 should report \$8,574.72; based on Schedule 1-IK.

All outstanding debt, if any, should be listed on Line 12a of the Summary Page.

Schedule 1A - Itemized Contributions:

Contribution #2 on pg 7 was reported from City Automotive. If from City Automotive, Inc., their name should be listed as the contributor and the following action should be taken since candidate committees are prohibited from accepting corporate contributions:

1. Your committee should immediately return the funds to the contributor.
2. Proof of return should be submitted to our office as soon as possible.
3. The transaction should be reported as an expenditure on your next due campaign statement.

Please clarify.

Occupation and Employer information should be provided for #3 on pg 7 - S. Grot - \$150.

Only one name should appear per contribution. Please provide the name of the responsible party for #1 on pg 8 - Michael, Marcelle Schichtel. (If a joint contribution was made on a single check, each contributor must be itemized separately.)

A Date is required for:

#3 on pg 8 of 12 - K. Williams
#4 on pg 4 of 12 - Global Lawn Care LLC
Heather Clayborn - \$30
DeLoring Burton - \$100

A complete Address is required for:

#2 on pg 2 of 12 - Y. Davis
#1 on pg 9 of 12 - L. Ingraham
#2 on pg 10 of 12 - N. Mabins

Please specify the Type of Contribution for:

#2 on pg 2 of 8 - CTE Lawanda Turner
#3 on pg 2 of 8 - K. Vesprini

Schedule 1-IK - Itemized In-Kind Contributions:

Item #6, Vendor Name and Address, needs to be completed for all of the contributions listed on Schedule 1-IK, except pages 35 of 36 and 36 of 36, to provide the name and address of the vendor paid.

Please specify the Type of Contribution for:

State Senate District 11

Two candidates are running for the Democratic nomination and one candidate is running for the Republican nomination to compete for one four-year term in November. State senators earn a salary of \$71,685.

Democrat

Veronica Klinefelt

Age: No answer given.

Occupation: County Commissioner

Municipality of residence: Eastpointe

For how long: For 30 years

Online campaign information: www.veronicaklinefelt.com

Education: Macomb Community College, Wayne State University, BS in Criminal Justice

Previously and currently held elected offices: Macomb County Commissioner (in 10th year), Eastpointe City Council (8 years), East Detroit School Board (6 years)

Top goals: Strong school districts and safe, clean neighborhoods are essential for thriving communities. We need to invest more locally. To attract businesses, we must invest in infrastructure, and training that meets the needs of today's job market. We need to support programs that enable seniors to maintain their independence. The most important aspect of being an elected official is to understand that we are public servants who should work toward better government.

Democrat

Monique Owens

Age: 38

Occupation: Mayor of Eastpointe, Michigan

Municipality of residence: Eastpointe, Michigan

For how long: 11+ years

Online campaign information: moniqueowensforsenate.org

Education: Bachelor's Degree in Political Science/Concentration in Criminal Justice (Madonna University)

Previously and currently held elected offices: Councilwoman of Eastpointe, Michigan(2017-2019) and Mayor of Eastpointe, Michigan (2019-Present)

Top goals: Access to affordable housing by providing grants and a plan for new housing development. Quality education for our children by providing access to resources that accommodate them in housing, before and after school nutritional food programs, and tutoring services. Gun safety by providing thorough background checks to obtain a firearm, especially for those with a history of mental illness. Stricker laws of a high and aggravated nature for those caught in possession of weapons obtained illegally.

Republican

Mike MacDonald

Running unopposed.

State House of Representatives District 13

Two candidates are running for the Democratic nomination and one candidate is running for the Republican nomination to compete for one two-year term in November. State representatives earn a salary of \$71,685.

Advertisement

🏠 > Getting Started > How to Begin

Free vs. Premium Site

Wix gives you everything you need to create a stunning website, including [free web hosting](#). You can choose to get even more benefits and features by upgrading to one of our Premium plans.

Here's an 'at a glance' view of the main differences between Premium and free sites.






Tip:

For a complete breakdown of each plan, click the **Upgrade** button in your Editor or dashboard, or click [here](#) to go there directly.

Feature	Free	Premium
Domain	Assigned URL: accountname.wixsite.com/siteaddress	Connect a custom domain
Wix ads	Wix ads appear on every page & favicon in URL	Remove Wix ads
Storage	Up to 500MB	Over 500MB available
Bandwidth	Up to 500MB	From 1GB and up available
Online payments	Not included	Included with Business Premium Plans

Customer support	Available	Premium & VIP support options including faster response time
Google Analytics	Not included	Included

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Templates	About Wix	Wix Blog	Support Center	The Wix website builder offers a complete solution from enterprise-grade infrastructure and business features to advanced SEO and marketing tools—enabling anyone to create and grow online. © 2006-2022 Wix.com, Inc
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Features	Investor Relations	Student Website	Status Page	
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- Patent Notice
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BBQ Fundraiser

MICHIGAN WINS WITH OWENS

THURSDAY, JUNE 16, 2022

5:00pm -8:00pm

J. F. KENNEDY PARK
24517 SCHROEDER
(off Stephens west of Kelly)
EASTPOINTE MI 48021
(EAST & WEST) PAVILLONS

\$30
Per Plate

Chicken
or Rib
Dinners

Delivery:
10+ Plates

Delivery & Advance Orders (by JUNE 12TH)
CALL: Yvonne N Thomas @ 313-671-1078

Monique Owens—State Senate

Please make Non-Corporate DONATIONS Payable to:
Supporters for Monique Owens for Senate
P. O. Box 97, Eastpointe MI 48021

NAME: _____

ADDRESS: _____

PHONE: _____

E-MAIL: _____

OCCUPATION: _____

EMPLOYER: _____

MICHIGAN WINS WITH OWENS



Theresa Mccoy

June 23 · 🌐

ICE CREAM FUNDRAISER



Percentage of the proceeds will go to
Supporters for Monique Owens for Senate

**THURSDAY JUNE 23, 2022
5PM-8PM**

TCBY 20385 MACK AVE
Grosse Pointe Woods, MI 48236

LEAVE YOUR RECEIPT AT THE COUNTER

Given by :Yvonne Thomas

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1



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 CAMPAIGN KICK OFF FUNDRAISER

Monique
OWENS

FOR STATE SENATOR **MI**
 MICHIGAN WINS WITH OWENS

CARSON HALL

22019 KELLY ROAD, EASTPOINTE,
 MICHIGAN 48021

THURSDAY MAY 26, 2022
5PM-8PM

COST: \$50

SPONSORSHIP LEVELS:

CHRIS ROCK \$2,000

D.L. HUGELY \$1,500

JERRY SEINFELD \$1,000

Checks Paid to Supporters for Monique Owens for Senate
 Cash app(\$supportersformonique)



P.O. Box 97, Eastpointe, Michigan 48021

Thanks to our sponsors

Epic Entertainment, Carson's Hall, Taco Bar, and Federation of DJs
 Paid for by the Supporters for Monique Owens for Senate



Celebrity Comedienne

Heather Kyles

Food Included (while it last)



Cover Page:

Your statement, specified as both a Post-Election and an Annual 2019 amendment, is presumed to be your 2019 Post-General amendment that was due on 1/16/20 and this Notice is based on that presumption. If not the 2019 Post-General amendment, please advise.

Summary Page:

Outstanding debt (Line 12a), beginning balance (Line 13) and ending balance (Line 17) cannot be verified until your 2019 Pre-General amendment has been submitted. Please submit them by the due date of this Notice.

The following item was overlooked on your amendment and still needs to be addressed:

Based on the information provided on your Pre-General and Post-General statements, it appears outstanding debt of \$184.69 reported on Line 12a is incorrect. (Your Pre-General reported outstanding debt of \$4,084.86 and your Post-General reported additional debt of \$184.69; for a total of \$4,269.55.)

Schedule 1-IK - Itemized In-Kind Contributions:

The first 12 pages report that the candidate made in-kind contributions and paid herself, as vendor, for them. The candidate should not be listed as both the contributor and the vendor. For each in-kind contribution, the person that purchased the item should be listed as the contributor (Item #3) and the name/address of the vendor they paid (store, restaurant, company, etc.) should be listed as the Vendor (Item #6). Please amend Schedule 1-IK accordingly.

The following item was overlooked on your amendment and still needs to be addressed:

Complete Item #6, Vendor Name and Address, to provide the name and address of the vendor paid for the following in-kind contributions:

#1 thru #3 on twelfth (last) page

Schedule 1B - Itemized Expenditures:

The following item was overlooked on your amendment and still needs to be addressed:

The Name and Address of the person or vendor paid is required for Expenditure #2 on pg 7 - \$12.21 on 11/18/19 for footwear.

Schedule 1E - Debts and Obligations:

Schedule 1E is required, itemizing all outstanding debt.

The Summary Pages of this and subsequent statements may be affected by the above.

Please clarify all of the above.

required

#1 on pg 10 - Sharwma - (assumed to be Shawarma Express LLC at same address) - \$20

#2 on pg 10 - Guissepes - (assumed to be Giuseppe's Bakery at same address) - \$30

Please advise if any of the above assumptions are incorrect.

If #3 on pg 8 was a contribution from Donna's Family Dining, the following action should be taken since it appears it is a corporate contribution which candidate committees are prohibited from accepting:

1. Your committee should correspond with the contributor and verify their corporate or non-corporate status. If incorporated, \$20 must immediately be forwarded to them.
2. A copy of the committee's return check should be submitted to our office as soon as possible.
3. The transaction should be reported as an expenditure on your next due campaign statement.

If you determine the contributor is not a corporation, please provide written documentation to substantiate that determination.

Schedule 1B - Itemized Expenditures:

If Expenditure #1 on pg 7 - \$600 to H. Dabaje for phone service - was a reimbursement, or if a third party was paid by Mr. Dabaje, memo-itemization is required to show the Name and Address of the party paid as well as the Date and Amount.

Schedule 1E - Debts and Obligations:

Schedule 1E, Debts & Obligations, is required to be submitted detailing the outstanding debt reported on Line 12a of the Summary Page. (Schedule 1E must continue to be filed with your statements until such time as the debt is either repaid or forgiven.)

Please clarify all of the above.

Please amend your statement accordingly and forward to us by October 13, 2020.

WHEN FILING AN AMENDED CAMPAIGN STATEMENT, PLEASE INCLUDE A COMPLETED COVER PAGE, INDICATING THAT THE CAMPAIGN STATEMENT IS BEING AMENDED, WITH APPROPRIATE SIGNATURE(S). ONLY THOSE PAGES BEING AMENDED NEED TO BE SUBMITTED WITH THE COVER PAGE.

AMENDMENTS MAY BE FAXED TO US AT (586) 469-6927. **IMPORTANT:** CALL (586) 469-5209 TO CONFIRM RECEIPT OF FAX.

Please clarify all of the above.

Schedule 1B - Itemized Expenditures:

The following expenditures were reported as having occurred after the close of books of this statement (11/25/19):

#5 on pg 5 - M. Owens - \$218.36 - 11/27/19
#1 on pg 6 - M. Owens - \$107.02 - 11/27/19
#2 on pg 6 - M. Owens - \$25.97 - 11/27/19
#3 on pg 6 - M. Owens - \$54.18 - 11/29/19

If those dates are correct, these in-kind contributions should instead appear on your next due statement. Removing them from this one will also affect the Summary Page.

The Name and Address of the person or vendor paid is required for Expenditure #2 on page 7 - \$12.21 on 11/18/19.

Please clarify all of the above.

Schedule 1E - Debts and Obligations:

The total amount of outstanding debt reported on Line 12a of the Summary Page must also be reflected on Schedule 1E. Outstanding debt must continue to be reported on both Line 12a of the Summary Page and on Schedule 1E until such time as it is either repaid or forgiven. Please amend Schedule 1E to report all outstanding debt.

Please amend your statement accordingly and forward to us by January 16, 2020.

WHEN FILING AN AMENDED CAMPAIGN STATEMENT, PLEASE INCLUDE A COMPLETED COVER PAGE, INDICATING THAT THE CAMPAIGN STATEMENT IS BEING AMENDED, WITH APPROPRIATE SIGNATURE(S). ONLY THOSE PAGES BEING AMENDED NEED TO BE SUBMITTED WITH THE COVER PAGE.

*AMENDMENTS MAY BE FAXED TO US AT (586) 469-6927. **IMPORTANT:** CALL (586) 469-5209 TO CONFIRM RECEIPT OF FAX.*



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

July 19, 2022

Monique Owens
22480 Petersburg Ave
Eastpointe, MI 48021

Re: *Schonert v. Owens*
Campaign Finance Complaint No. 2022-06-25-226

Dear Ms. Owens:

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 failed to properly report the contributions from a fundraiser you hosted on August 15, 2021. The complaint also alleges that you distributed a campaign advertisement in a supermarket circular without including a "paid for by" statement. A copy of the complaint is included with this notice.

Allegation 1: Fundraiser Reporting

MCL 169.226(1)(d) requires that the following details about a fundraiser be included in a campaign statement:

- (i) The type of event, date held, address and name, if any, of the place where the activity was held, and approximate number of individuals participating or in attendance.
- (ii) The total amount of all contributions.
- (iii) The gross receipts of the fund-raising event.
- (iv) The expenditures incident to the event.

(i) – (i)(v). A person who knowingly omits or underreports contributions required to be disclosed by the Act is subject to a civil fine of not more than \$1,000.00 or the amount omitted or underreported, whichever is greater. MCL 169.233(11).

Allegation 2: Campaign Advertisement

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 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 of the penalty provided in section 33(11) of the Act.

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

State Level Offices

Contribution Limits For State Level Office

Contribution Limits The Michigan Campaign Finance Act (MCFA) establishes contribution limits for publicly elected offices in Michigan. This means that candidates running for office are limited in what they are allowed to accept from individuals and groups in an election cycle and these same individuals and groups are limited in what they can contribute to a candidate in an election cycle. To understand the contribution limits, we must establish an understanding of elections cycles.

Election Cycles are time frames provided in the MCFA to accumulate contributions and expenditures for reporting purposes and to avoid violating the MCFA by accepting or making an excess contribution. Contribution limits for all offices are based on the election cycle of the office.

If you are using the MERTS Software, the election cycles must be entered properly for the software to accumulate contributions and expenditures properly. See MERTS User Guide for more information concerning the MERTS Software.

Determining the Election Cycle for a Campaign

- For a general election, the election cycle begins the day following the last general election in which the office appeared on the ballot and ends on the day of the next general election in which the office appears on the ballot.
- For a special election, the election cycle begins the day the special general election is called or the date the office becomes vacant (whichever is earlier) and ends on the day of the special general election.

State Level Offices

Contributor⇒ Office↓	Individual Contribution Limit	Political (PAC) Committee Contribution Limit	Independent (PAC) Committee Contribution Limit	Caucus (PAC) Committee Contribution Limit	District Political Party Committee Contribution Limit	County Political Party Committee Contribution Limit	State Political Party Committee Contribution Limit
Governor and Lt. Governor — With Public Funding	\$7,150	\$7,150	\$71,500	\$71,500	\$30,000	\$30,000	\$750,000
Governor and Lt. Governor — Without Public Funding	\$7,150	\$7,150	\$71,500	\$71,500	\$71,500	\$71,500	\$143,000
Secretary of State	\$7,150	\$7,150	\$71,500	\$71,500	\$71,500	\$71,500	\$143,000
Attorney General	\$7,150	\$7,150	\$71,500	\$71,500	\$71,500	\$71,500	\$143,000

State Senate	\$2,100	\$2,100	\$21,000	**Unlimited	\$21,000	\$21,000	\$21,000
State Representative	\$1,050	\$1,050	\$10,500	**Unlimited	\$10,500	\$10,500	\$10,500
State Board of Education	\$7,150	\$7,150	\$71,500	\$71,500	\$71,500	\$71,500	\$143,000
University of Michigan Regents	\$7,150	\$7,150	\$71,500	\$71,500	\$71,500	\$71,500	\$143,000
Michigan State University Trustees	\$7,150	\$7,150	\$71,500	\$71,500	\$71,500	\$71,500	\$143,000
Wayne State University Governors	\$7,150	\$7,150	\$71,500	\$71,500	\$71,500	\$71,500	\$143,000

** A Senate or House Caucus committee is prohibited from making a contribution to or an expenditure on behalf of a State Representative or State Senate candidate if the candidate is running against opposition in a primary.

Michigan.gov

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Secretary of State Jocelyn Benson

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Michigan Committee Statement Contributions

- ▣ **Committee Name:** SUPPORTERSFORMONIQUEOWENSFORSENATE
- ▣ **Statement Type:** PRE-PRIMARY CS
- ▣ **Statement Year:** 2022
- ▣ **Schedule:** ITEMIZED DIRECT CONTRIBUTIONS

[« Back to statement details](#)**Matches 1 - 19 of 19****Result #1****Receiving Committee**

SUPPORTERSFORMONIQUEOWENSFORSENATE

Committee ID-Type

520696 – CAN

Schedule Type

DIRECT

Description

Received From

MONIQUE OWENS
P.O. BOX 97
MAYOR
CITY OF EASTPOINTE

City State Zip

EASTPOINTE
MI 48021

Date

07/17/2022

Amount

\$4,500.00

Cummul

\$4,500.00

Result #2**Receiving Committee**

SUPPORTERSFORMONIQUEOWENSFORSENATE

Committee ID-Type

520696 - CAN

Schedule Type

DIRECT

Description**Received From**

ANTHONY BAKKO
4835 FAIRVIEW CT

City State Zip

BLOOMFIELD
MI 48322

Date

06/17/2022

Amount

\$1,000.00

Cummul

*no employer
occupation
place of business*

\$1,000.00

Result #3**Receiving Committee**

SUPPORTERSFORMONIQUEOWENSFORSENATE

Committee ID-Type

520696 - CAN

Schedule Type

DIRECT

Description**Received From**

FORD

18510 JULIANNA

City State Zip

EASTPOINTE

MI 48021

Date

06/16/2022

Amount

\$1,000.00

Cummul

\$1,000.00

*incomplete name
no occupation,
employer, or
place of business*

Result #4**Receiving Committee**

SUPPORTERSFORMONIQUEOWENSFORSENATE

Committee ID-Type

520696 - CAN

Schedule Type

DIRECT

Description**Received From**

WALTMAN

P.O. BOX 59

*incomplete name
no occupation,
employer, or
place of business*

City State Zip

ROSEVILLE
MI 48066

Date

07/07/2022

Amount

\$1,000.00

Cummul

\$1,000.00

Result #5**Receiving Committee**

SUPPORTERSFORMONIQUEOWENSFORSENATE

Committee ID-Type

520696 – CAN

Schedule Type

DIRECT

Description**Received From**

YVONNE THOMAS
17416 COLLINSON

*no occupation,
employer, or
place of business*

City State Zip

EASTPOINTE
MI 48021

Date

06/17/2022

Amount

\$950.00

Cummul

\$1,850.00

Result #6**Receiving Committee**

SUPPORTERSFORMONIQUEOWENSFORSENATE

Committee ID-Type

520696 - CAN

Schedule Type

DIRECT

Description**Received From**YVONNE THOMAS
17416 COLLINSON*no employer,
occupation,
or place of
business***City State Zip**EASTPOINTE
MI 48021**Date**

05/26/2022

Amount

\$900.00

Cummul

\$900.00

Result #7**Receiving Committee**

SUPPORTERSFORMONIQUEOWENSFORSENATE

Committee ID-Type

520696 - CAN

Schedule Type

DIRECT

Description**Received From**STEPHANIE MOULTON
75 KING STREET*no occupation,
employer, or
place of business***City State Zip**MIL VALLEY
CA 94941**Date**

07/03/2022

Amount

\$145.51

Cummul

\$145.51

Result #8**Receiving Committee**

SUPPORTERSFORMONIQUEOWENSFORSENATE

Committee ID-Type

520696 – CAN

Schedule Type

DIRECT

Description**Received From**

BRANDT HOWARD

15110 TOEPFER

City State Zip

EASTPOINTE

MI 48021

Date

07/03/2022

Amount

\$100.00

Cummul

\$100.00

Result #9**Receiving Committee**

SUPPORTERSFORMONIQUEOWENSFORSENATE

Committee ID-Type

520696 – CAN

Schedule Type

DIRECT

Description**Received From**

CLINT PATTAN
18801 E. 9 MILE

City State Zip

EASTPOINTE
MI 48021

Date

07/17/2022

Amount

\$100.00

Cummul

\$300.00

Result #10**Receiving Committee**

SUPPORTERSFORMONIQUEOWENSFORSENATE

Committee ID-Type

520696 - CAN

Schedule Type

DIRECT

Description**Received From**

EVANS
18925 PARKSIDE

City State Zip

DETROIT
MI 48214

Date

05/26/2022

Amount

\$100.00

Cummul

not a residential
no address
no occupation,
employer, or
place of business

incomplete name

\$100.00

Result #11

Receiving Committee

SUPPORTERSFORMONIQUEOWENSFORSENATE

Committee ID-Type

520696 – CAN

Schedule Type

DIRECT

Description**Received From**

TERRY FAIRLEY

18051 MOTT

City State Zip

EASTPOINTE

MI 48021

Date

06/16/2022

Amount

\$60.00

Cummul

\$60.00

Result #12

Receiving Committee

SUPPORTERSFORMONIQUEOWENSFORSENATE

Committee ID-Type

520696 – CAN

Schedule Type

DIRECT

Description**Received From**

KIMLE NAILER

16084 STRICKER

City State Zip

EASTPOINTE
MI 48021

Date

06/17/2022

Amount

\$60.00

Cummul

\$60.00

Result #13**Receiving Committee**

SUPPORTERSFORMONIQUEOWENSFORSENATE

Committee ID-Type

520696 - CAN

Schedule Type

DIRECT

Description**Received From**

DORIS FAUTH
52962 WESTCREEK

City State Zip

MACOMB
MI 48042

Date

07/17/2022

Amount

\$50.00

Cummul

\$50.00

Result #14**Receiving Committee**

SUPPORTERSFORMONIQUEOWENSFORSENATE

Committee ID-Type

520696 - CAN

Schedule Type

DIRECT

Description**Received From**

ELAINE FLOWERS

43426 PENDLETON CIRCLE

City State Zip

STERLING HEIGHTS

MI 48313

Date

05/26/2022

Amount

\$50.00

Cummul

\$50.00

Result #15**Receiving Committee**

SUPPORTERSFORMONIQUEOWENSFORSENATE

Committee ID-Type

520696 - CAN

Schedule Type

DIRECT

Description**Received From**

ERIC LLOYD

20531 KELLY RS

City State Zip

HARPERWOODS

MI 48225

Date

not a residential
address

05/26/2022

Amount

\$50.00

Cummul

\$50.00

Result #16**Receiving Committee**

SUPPORTERSFORMONIQUEOWENSFORSENATE

Committee ID-Type

520696 – CAN

Schedule Type

DIRECT

Description**Received From**

ROHEIAH WARD

51604 VALLEY VIEW CRT

City State Zip

CHESTERFILED

MI 48051

Date

06/17/2022

Amount

\$50.00

Cummul

\$50.00

Result #17**Receiving Committee**

SUPPORTERSFORMONIQUEOWENSFORSENATE

Committee ID-Type

520696 – CAN

Schedule Type

DIRECT

Description**Received From**

CAROLINE CHAMBERS
34246 PIONEER

City State Zip

FRASER
MI 48026

Date

07/02/2022

Amount

\$25.00

Cummul

\$25.00

Result #18**Receiving Committee**

SUPPORTERSFORMONIQUEOWENSFORSENATE

Committee ID-Type

520696 – CAN

Schedule Type

DIRECT

Description**Received From**

RUTH WALKER
4080 E. OUTER DRIVE

City State Zip

DETROIT
MI 48234

Date

06/17/2022

Amount

\$9.22

Cummul

\$9.22

Result #19**Receiving Committee**

SUPPORTERSFORMONIQUEOWENSFORSENATE

Committee ID-Type

520696 - CAN

Schedule Type

DIRECT

Description**Received From**

TOM KING

48521 DECLARATION DRIVE

City State Zip

MACOMB

MI 48044

Date

06/17/2022

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Michigan Committee Statement Contributions

- ▣ **Committee Name:** SUPPORTERSFORMONIQUEOWENSFORSENATE
- ▣ **Statement Type:** PRE-PRIMARY CS
- ▣ **Statement Year:** 2022
- ▣ **Schedule:** IN-KIND EXPENDITURES

[« Back to statement details](#)**Matches 1 - 1 of 1****Result #1****Receiving Committee**

SUPPORTERSFORMONIQUEOWENSFORSENATE

Committee ID-Type

520696 - CAN

Schedule Type

INKIND

Description

CAIMPAIGN LOGO

Received FromCLINT PATAH
18801 E. 9 MILE

not a residential address
no occupation, employer, or place of business

City State Zip

EASTPOINTE

MI 48021

Vendor**Date**

06/01/2022

Amount

\$200.00

Cummul

\$200.00

Matches 1 - 1 of 1

*

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Michigan Committee Statement Expenditures

- ▣ **Committee Name:** SUPPORTERSFORMONIQUEOWENSFORSENATE
- ▣ **Statement Type:** PRE-PRIMARY CS
- ▣ **Statement Year:** 2022
- ▣ **Schedule:** ITEMIZED DIRECT EXPENDITURES

[« Back to statement details](#)**Matches 1 - 10 of 10****Result #1****Committee Making Expenditure**

SUPPORTERSFORMONIQUEOWENSFORSENATE

Committee ID-Type

520696 - CAN

Schedule Type

DIRECT

Payee

MONIQUE OWENS
P.O. BOX 97
EASTPOINTE, MI 48021

Expense Date

05/01/2022

Exp Code**Purpose**

STAMPS

Amount or Value

\$6,800.00

Support/Oppose**Office****Result #2****Committee Making Expenditure**

SUPPORTERSFORMONIQUEOWENSFORSENATE

Committee ID-Type

520696 – CAN

Schedule Type

DIRECT

Payee

MONIQUE OWENS

P.O. BOX 97

EASTPOINTE, MI 48021

Expense Date

05/01/2022

Exp Code**Purpose**

MAGNETS

Amount or Value

\$1,100.00

Support/Oppose

Office**Result #3****Committee Making Expenditure**

SUPPORTERSFORMONIQUEOWENSFORSENATE

Committee ID-Type

520696 - CAN

Schedule Type

DIRECT

Payee

MONIQUE OWENS

P.O. BOX 97

EASTPOINTE, MI 48021

Expense Date

05/01/2022

Exp Code**Purpose**

PRINTING

Amount or Value

\$1,000.00

Support/Oppose**Office****Result #4****Committee Making Expenditure**

SUPPORTERSFORMONIQUEOWENSFORSENATE

Committee ID-Type

520696 - CAN

Schedule Type

DIRECT

Payee

MONIQUE OWENS
P.O. BOX 97
EASTPOINTE, MI 48021

Expense Date

05/01/2022

Exp Code**Purpose**

HALL RENTAL

Amount or Value

\$600.00

Support/Oppose**Office****Result #5****Committee Making Expenditure**

SUPPORTERSFORMONIQUEOWENSFORSENATE

Committee ID-Type

520696 - CAN

Schedule Type

DIRECT

Payee

MONIQUE OWENS
P.O. BOX 97
EASTPOINTE, MI 48021

Expense Date

05/01/2022

Exp Code**Purpose**

MARKETING

Amount or Value

\$600.00

Should probably
say:

Carsons Hall
22019 Kelly Rd
Eastpointe, MI 48021

(see fundraiser event #2
on fundraiser schedule)

Support/Oppose**Office****Result #6****Committee Making Expenditure**

SUPPORTERSFORMONIQUEOWENSFORSENATE

Committee ID-Type

520696 – CAN

Schedule Type

DIRECT

Payee

MONIQUE OWENS

P.O. BOX 97

EASTPOINTE, MI 48021

Expense Date

05/01/2022

Exp Code**Purpose**

FLIERS

Amount or Value

\$550.00

Support/Oppose**Office****Result #7****Committee Making Expenditure**

SUPPORTERSFORMONIQUEOWENSFORSENATE

Committee ID-Type

520696 – CAN

Schedule Type

DIRECT

Payee

MONIQUE OWENS
P.O. BOX 97
EASTPOINTE, MI 48021

Expense Date

05/01/2022

Exp Code**Purpose**

ENVELOPES

Amount or Value

\$500.00

Support/Oppose**Office****Result #8****Committee Making Expenditure**

SUPPORTERSFORMONIQUEOWENSFORSENATE

Committee ID-Type

520696 – CAN

Schedule Type

DIRECT

Payee

MONIQUE OWENS
P.O. BOX 97
EASTPOINTE, MI 48021

Expense Date

05/01/2022

Exp Code**Purpose**

LAWN SIGNS

Amount or Value

\$450.00

Support/Oppose**Office****Result #9****Committee Making Expenditure**

SUPPORTERSFORMONIQUEOWENSFORSENATE

Committee ID-Type

520696 - CAN

Schedule Type

DIRECT

Payee

MONIQUE OWENS

P.O. BOX 97

EASTPOINTE, MI 48021

Expense Date

05/01/2022

Exp Code**Purpose**

PHOTOS

Amount or Value

\$80.00

Support/Oppose**Office****Result #10****Committee Making Expenditure**

SUPPORTERSFORMONIQUEOWENSFORSENATE

Committee ID-Type

520696 – CAN

Schedule Type

DIRECT

Payee

MONIQUE OWENS
P.O. BOX 97
EASTPOINTE, MI 48021

Expense Date

05/01/2022

Exp Code**Purpose**

POST OFFICE MAILING ADDRESS

Amount or Value

\$60.00

Support/Oppose**Office**[Michigan Home](#) [Michigan SOS](#)

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

October 24, 2022

Monique Owens
22480 Petersburg Ave
Eastpointe, MI 48021

Re: *Schonert v. Owens*
Campaign Finance Complaint No. 2022 – 10 – 137 – 26

Dear Ms. Owens:

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 failed to report contributions submitted to your campaign via a GoFundMe fundraiser page; that you failed to report an in-kind contribution for pavilion rentals; that you failed to report contributors' full names;¹ that you failed to report the employers and occupations of contributors who gave more than \$100 to your campaign; that you failed to report certain expenditures; and that one of your contributors exceeded the individual contribution limit. A copy of the complaint is included with this notice.

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).

In Michigan, contributions to a candidate committee are governed by statute. MCL 169.252. Specifically, in Michigan, an individual may not contribute more than \$2,100 to a state senate candidate. [Michigan Elections - Disclosure Division - - Contribution And Expenditure Limits \(mertsplus.com\)](https://mertsplus.com/michigan-elections-disclosure-division-contribution-and-expenditure-limits)

¹ While the Department does not investigate violations based on de minimus errors or omissions such as a misspelled name, inclusion of only a first or last name in campaign finance reporting may not provide sufficient specificity as required by statute.

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

<https://campaignfinance.us/docs.macomb.mi/470888610.PDF>

To this date, the county clerk shows no record of any Amended October 2021 Quarterly Statement being filed, which means that the contributions, contributor information, and fundraiser remain unreported.

On August 24, 2022, more than a year after the fundraiser had taken place, the county clerk received a Miscellaneous Filing from Owens. The county clerk is apparently confused about its contents, given that they have labeled it “Miscellaneous Filing”. This is not a valid amendment to the October 2021 Quarterly Statement. Therefore, the October 2021 Quarterly Statement has still not been amended; the contributions, contributor information, and fundraiser remain unreported.

This evidence supports the conclusion that Owens not only violated the Section 26 of the MCFA but also remains in violation to this day.

Miscellaneous Filing dated August 25, 2022:

<https://campaignfinance.us/docs.macomb.mi/471775997.pdf>

The Miscellaneous Filing received by the clerk on August 24, 2022, appears to contain two statements that should have been filed separately:

1. Amendment to the October 2021 Quarterly (pages 1–3 of the PDF) — see page 1 for cover page.
2. Amendment to the October 2021 Quarterly (pages 4–29 of the PDF) — see page 4 for cover page.

The contribution recorded on page 3 is dated 10/20/21–1/31/22. Based on this, it seems that the material on pages 1–3 should have been identified on the cover page as an amendment to the 2021 Annual Statement, not an October 2021 Quarterly Statement.

The material on pages 4–29 of the Miscellaneous Filing, which appears to be an attempt to amend the October 2021 Quarterly Statement, is rife with errors—nearly every page contains some sort of error or omission. Its contents even reveal evidence of additional potential violations of the MCFA, including but not limited to the following:

- accepting contributions exceeding the contribution limits
- omitting employer information for contributions over \$100
- omitting cumulative amounts contributed by each individual

I have made an attempt to summarize the Miscellaneous Filing's problems page by page as follows.

Page 1

In line 4a, the community served is not specified. (It should be "City of Eastpointe".)

In line 5, the committee's area code and phone are missing.

Page 2

In line 17, the ending balance is calculated incorrectly. Given the values in lines 15 (\$500) and 16 (\$0), line 17 should be \$500, not \$0.

Page 3

Line 7 (cumulative contributions) is empty. The contributor's cumulative contributions during the election cycle should be specified.

In line 4, the Date of Receipt should be a specific date, not a range.

Page 4

In line 4a, the community served is not specified. (It should be "City of Eastpointe".)

In line 5, the committee's area code and phone are missing.

Page 5

Column II is completely empty.

In line 17, the ending balance is calculated incorrectly. Given the values in lines 15 (\$5,030) and 16 (\$5,574.97), the ending balance on line 17 should be \$ -544.97 (negative, not positive).

Also, given that line 17 when correctly calculated results in a negative ending balance, it seems that one or more of the values on lines 15 and 16 are incorrect.

Page 6

Line 7 (cumulative contributions) is empty.

Page 7

Line 7 (cumulative contributions) is empty.

Page 8

Line 7 (cumulative contributions) is empty.

Page 9

On line 2, the committee name is missing.

Line 7 (cumulative contributions) is empty.

The \$1,200 contribution from Mike Sharrack likely exceeds the individual contribution limit for a mayoral campaign committee in Eastpointe. In 2022, the individual contribution limit for this office is \$1,050 and this limit likely would have been the same or even lower in 2021.

Please refer to this document for 2022 contribution limits:

<https://clerk.macombgov.org/sites/default/files/content/government/clerk/pdfs/cf-contribution-limits1.pdf>

Page 10

On line 2, the committee name is missing.

Line 7 (cumulative contributions) is empty.

Page 11

On line 2, the committee name is missing.

Line 7 (cumulative contributions) is empty.

The \$1,200 contribution from Anthony Bakko likely exceeds the individual contribution limit for a mayoral campaign committee in Eastpointe. In 2022, the individual contribution limit for this office is \$1,050 and this limit likely would have been the same or even lower in 2021.

Please refer to this document for 2022 contribution limits:

<https://clerk.macombgov.org/sites/default/files/content/government/clerk/pdfs/cf-contribution-limits1.pdf>

Stephen V. Pangori contributed more than \$100, but his employer and business address are not specified.

Page 12

On line 2, the committee name is missing.

Line 7 (cumulative contributions) is empty.

Page 13

On line 2, the committee name is incomplete (“Owens” is omitted).

Line 8 (cumulative contributions) is empty.

Monique Owens cumulatively gave more than \$100 to her campaign committee in in-kind contributions, but her occupation, employer name, and business address are not specified.

For all in-kind contributions, line 5 should contain a specific date, not a date range.

Addresses for all vendors on this page are either missing or incomplete:

- Macy’s - no address whatsoever
- Cracker Barrel - incomplete (only city and state specified)
- Tim Horton’s - incomplete (only city and state specified)

Page 14

On line 2, the committee name is missing.

Line 8 is empty.

For all in-kind contributions, line 5 should contain a specific date, not a date range.

Addresses for all vendors on this page are incomplete:

- BP Gas Station - incomplete (only city and state specified)
- K&9 Beauty Supply - incomplete (only city, state, and ZIP specified)

- Hop Cat - incomplete (only city, state, and ZIP specified)

Page 15

On line 2, the committee name is missing.

Line 8 is empty.

For all in-kind contributions, line 5 should contain a specific date, not a date range.

Addresses for all vendors on this page are either missing or incomplete:

- All Pro Color Inc. - incomplete (only city and state specified)
- WGPR 107.5 - incomplete (only city and state specified)
- Apple - no address whatsoever

Page 16

On line 2, the committee name is missing.

Line 8 is empty.

Contribution #1 is missing information.

- The description is empty.
- On line 5, the Date of Receipt is empty.
- Line 6 is incomplete. The address for vendor Epic Entertainment is incomplete, containing only the city, state, and ZIP code.

For Contribution #2, line 5 should contain a specific date, not a date range. Also, on line 6, the address for vendor Fiverr Inc is not specified.

Page 17

On line 2, the committee name is missing.

Line 8 is empty.

For all in-kind contributions, line 5 should contain a specific date, not a date range.

Contribution #2 lists several amounts on line 7: \$12.55, \$28.38, \$7.28, and \$49.48. If these are distinct contributions, they should be itemized as separate contributions.

Addresses for all vendors on this page are either missing or incomplete:

- Amazon Mktpl. - no address whatsoever
- Fiverr Inc. - no address whatsoever
- Bean Brothers Trophy & Awards - address is incomplete (only street, city, and state are specified)

Page 18

On line 2, the committee name is missing.

Line 8 is empty.

For all in-kind contributions, line 5 should contain a specific date, not a date range.

Addresses for all vendors on this page are incomplete:

- BP Toma Ventures - incomplete (only street, city, and state specified)
- Shoe Rack Outlet - incomplete (only street, city, and state specified)
- Billy's Nails / Foot Spa - incomplete address (only city and state specified)

Page 19

On line 2, the committee name is missing.

Line 8 is empty.

For all in-kind contributions, line 5 should contain a specific date, not a date range.

Addresses for all vendors on this page are either missing or incomplete:

- Metro PCS - no address whatsoever
- Speedway - incomplete address (only street, city, and state specified)
- Premiere Nail Spa - incomplete address (only city and state specified)

Page 20

On line 2, the committee name is missing.

Line 8 is empty.

For all in-kind contributions, line 5 should contain a specific date, not a date range.

Addresses for all vendors on this page are incomplete:

- Carrabbass (7306) - incomplete address (only city and state specified)
- Second Glance Resale - incomplete address (only city specified)
- Samira's Family Fashion - incomplete address (only city and state specified)

Page 21

On line 2, the committee name is missing.

Line 8 is empty.

For all in-kind contributions, line 5 should contain a specific date, not a date range.

Addresses for all vendors on this page are incomplete:

- Avenue Boutique Collective - incomplete address (only city and state specified)
- All Pro - incomplete address (only city and state specified)
- Marathon Petroleum - incomplete address (only city and state specified)

Page 22

On line 2, the committee name is missing.

Line 8 is empty.

For all in-kind contributions, line 5 should contain a specific date, not a date range.

Addresses for all vendors on this page are incomplete:

- DSW - incomplete address (only street, city, and state specified)
- Office Depot - incomplete address (only street, city, and state specified)
- Lucky Nails Spa - incomplete address (only city and state specified)

Page 23

On line 2, the committee name is missing.

Line 8 is empty.

For all in-kind contributions, line 5 should contain a specific date, not a date range.

Addresses for all vendors on this page are incomplete:

- Anton Art Center - incomplete address (only city and state specified)
- Mylah Tate - incomplete address (only street, city, and state specified)
- Tylisha Winters - incomplete address (only city and state specified)

Page 24

On line 1, the committee ID number is missing.

On line 2, the committee name is missing.

Line 8 is empty.

For all in-kind contributions, line 5 should contain a specific date, not a date range.

For all three contributions on this page, the description mentions a fundraiser, but the “Fund Raiser Contribution” boxes were not checked for any of these contributions.

Addresses for all vendors on this page are either missing or incomplete:

- Deonda Easley / Epic Entertainment - incomplete address (only city, state, and ZIP specified)
- Eryk White - no address whatsoever
- Montrice Wilson - no address whatsoever

Page 25

On line 1, the committee ID number is missing.

On line 2, the committee name is missing.

Line 8 is empty.

For all in-kind contributions, line 5 should contain a specific date, not a date range.

Contribution #2’s description mentions a fundraiser, but the “Fund Raiser Contribution” boxes was not checked.

Addresses for all vendors on this page are either either missing or incomplete:

- Epic Entertainment (Contribution #1) - no address whatsoever
- Epic Ent. (Contribution #2) - incomplete address (only city, state, and ZIP specified)

- Fishbones - incomplete address (only city and state specified)

Page 26

On line 1, the committee ID number is missing.

On line 2, the committee name is missing.

Line 8 is empty.

For all in-kind contributions, line 5 should contain a specific date, not a date range.

Addresses for all vendors on this page are missing altogether.

- Adrian Keys - no address whatsoever
- Montrice Wilson - no address whatsoever
- Eboni Price Lane - no address whatsoever

Page 27

For Debt #1 on this page, given the values on line 6 and 8, line 9 is calculated incorrectly. \$7,976.86 minus \$2,920 is \$5,056.86, not \$4,084.86.

Because line 9 was incorrectly calculated, the Page Subtotal at the bottom is also incorrect.

Debt #1 line 9: \$5,056.86 (corrected value)

Debt #2 line 9: \$4,369.55

Debt #3 line 9: \$3,419.55

If Debt #1 line 9 should be \$5,056.86, then that value added to Debt #2 (\$4,369.55) and Debt #5 (\$3,419.55) would result in a Page Subtotal of \$12,845.96, not \$3,419.55.

The Grand Total of all Schedules 1E is also incorrectly stated as \$7,484.07. The outstanding balances for the three debts listed on this page alone add up to \$12,845.96 (not including the three debts on the following page, page 28).

After correcting the outstanding balance of Debt #1 on page 27 as indicated above, the outstanding balances (lines 9) for the six debts listed on the Schedules 1E (pages 27 and 28) would then total \$25,494.55.

Page 28