

2023 JAN -5 PM 2:39

ELECTIONS/GREAT SEAL

Campaign Finance Complaint Form
Michigan Department of State

This complaint form may be used to file a complaint alleging that someone violated the Michigan Campaign Finance Act (the MCFA, 1976 PA 388, as amended; MCL 169.201 *et seq.*). All information on the form must be provided along with an original signature and evidence. Please print or type all information.

I allege that the MCFA was violated as follows:

Section 1. Complainant		
Your Name <i>Gerard Sullivan</i>	Daytime Telephone Number <i>231-881-7133</i>	
Mailing Address <i>3775 Blackhawk Dr. SW</i>		
City <i>Grandville</i>	State <i>MI</i>	Zip <i>49418</i>

Section 2. Alleged Violator		
Name <i>Stefanie Boone for Kent County Commissioner</i>		
Mailing Address <i>2205 Knollpoint Dr. NE</i>		
City <i>Ada</i>	State <i>MI</i>	Zip <i>49301</i>

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

Section(s) of the MCFA violated:

169.226 Sec. 26 (1)(j)

Explain how those sections were violated:

Candidate Boone made expenditures that were not included on her campaign finance reports. Full page print advertisements were taken out in local newspaper.

Committee I.D. # 2022005

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

Ads in the Lowell Buyers Guide with her candidate committee disclaimer. (Attached.)

Section 4. Certification (Required)

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

X

Signature of Complainant

Date

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

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

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

X

Signature of Complainant

Date

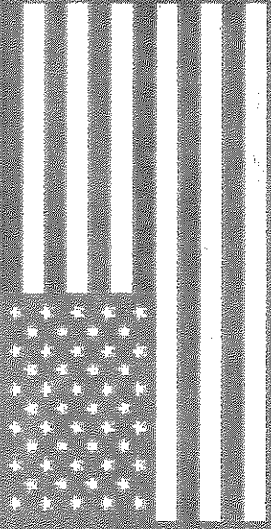
Section 15(8) of the MCFA provides that a person who files a complaint with a false certification is responsible for a civil violation of the MCFA. The person may be required to pay a civil fine of up to \$1,000.00 and some or all of the expenses incurred by the Michigan Department of State and the alleged violator as a direct result of the filing of the complaint.

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

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

grassroots
energy.

PATRIOTIC POWER.



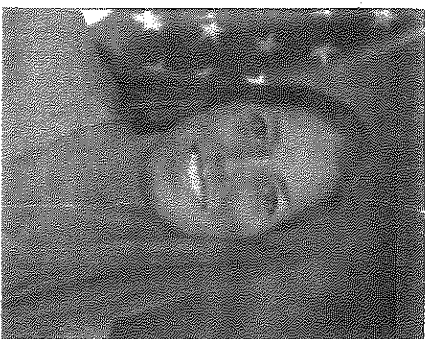
**Stefanie
BOONE**

for

**Kent County
Commissioner**

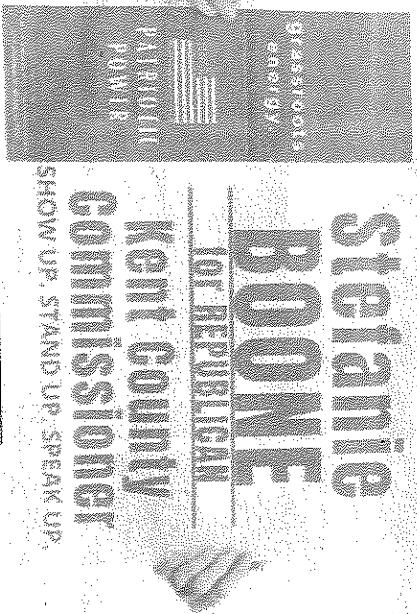
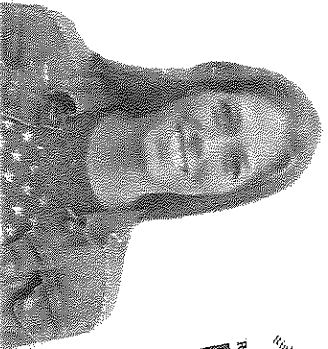
**Vote
ON
AUG 2!**

Show up. Stand up. Speak up!



DONATE/YARD SIGNS

A vote for Stefanie Boone means...



- ✓ **A VOTE FOR THE UNBORN**
MOM OF 6, UNAPOLOGETICALLY PRO LIFE
- ✓ **A VOTE FOR SMALL BUSINESS**
20+ YEARS SMALL BUSINESS OWNER/MANAGER
- ✓ **A VOTE FOR MEDICAL FREEDOM**
PRO INDIVIDUAL AND PARENTS' RIGHTS
- ✓ **A VOTE FOR TRANSPARENCY**
PRO BUDGET ACCOUNTABILITY AND TRANSPARENCY
- ✓ **A VOTE FOR LAW & ORDER**
PRO 2ND AMENDMENT AND LAW ENFORCEMENT
- ✓ **A VOTE FOR COMMON SENSE**
PRO SCHOOL & COMMUNITY DECISIONS THAT BENEFIT ALL

Paid for by: Stefanie Boone for Kent County Commissioner, 2205 Knollpoint Dr., NE, Ada, MI 49301,
616.862.9832

VOTE BOONE ON AUGUST 2 FOR THE CONSTITUTION!

I Signed the KENTCONTRACT.com for YOU



Show Up. Stand up. Speak up! For our future

PAID FOR BY: Stefanie Boone for Kent County Commissioner 2205 Knollpoint Dr. NE Ada, MI 49301 616.862.9832

SENATE BILL No. 1117

A bill to enter into the interstate compact to elect the president by national popular vote; and for related purposes.

Sec. 1. This act shall be known and may be cited as the "interstate compact to elect the president by national popular vote".

www.legislature.mi.gov/documents/2017-2018/billintroduced/senate/pdf/2018-SIB-1117.pdf

A bill to enter into the interstate compact to elect the president by national popular vote; and for related purposes.

Sec. 1. This act shall be known and may be cited as the "interstate compact to elect the president by national popular vote".

www.legislature.mi.gov/documents/2017-2018/billintroduced/senate/pdf/2018-SIB-1117.pdf

A CONTINGENT OF MICHIGAN REPUBLICAN LAWMAKERS were invited by a California group to a weekend at the oceanfront Westin Hapuna Beach Resort on the Island of Hawaii in August. Above is an image from the resort's website.

Kent County for as a Commissioner?



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

January 31, 2023

Stefanie Boone for Kent County Commissioner
2205 Knollpoint Dr. NE
Ada, MI 49301

Re: *Sullivan v. Stephanie Boone for Kent County Commissioner*
Campaign Finance Complaint No. 23-003

Dear Stephanie Boone for Kent County Commissioner:

The Department of State (Department) has received a formal complaint filed against you by Gerard Sullivan alleging that you violated the Michigan Campaign Finance Act (MCFA or Act). Specifically, the complaint alleges that you made expenditures for advertisements that were not included in your pre-primary campaign finance report, filed with Kent County July 20, 2022. The Department confirmed independently that an expenditure for the cost of the advertisements does not appear to be accounted for in the [report](#). 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).

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. Sullivan, who will have an opportunity to submit a rebuttal statement to the Department. After reviewing the statements and materials provided by the parties, the Department will determine whether “there may be reason to believe that a violation of [the MCFA] has occurred [.]” MCL 169.215(10). Note that the Department’s enforcement powers include the possibility of entering a conciliation agreement, conducting an administrative hearing, or referring this matter to the Attorney General for enforcement.

If you have any questions concerning this matter, you may contact the Regulatory Section of the Bureau of Elections at BOERegulatory@Michigan.gov.

Sincerely,

Regulatory Section
Bureau of Elections
Michigan Department of State

Enclosure
c: Gerard Sullivan

RECEIVED/FILED
MICHIGAN DEPT OF STATE

February 5, 2023

2023 FEB -8 PM 2:18

RECEIVED/GREAT SEAL

To Whom it May Concern;

I am in receipt of your letter dated 1/31/2023, alleging that my campaign for Kent County Commissioner is in violation of MCFA. Thank you for bringing this to my attention. After review of my records, it does appear that an oversight on my part has occurred. On 7/28/2022 I made a payment to the Lowell Ledger/Buyers Guide in the amount of \$1011.15 for the ad in question in this complaint. I used my personal credit card for this expenditure, and overlooked the expense when reviewing my accounts at the time of filing. There is no debt owed by the campaign, as the debt has been forgiven by the campaign and the campaign committee has been closed.

I logged into the online filing system on 2/5/2023 and submitted an amendment to reflect this oversight.

I am not sure if there is any follow-up action necessary to this, but please inform me if there is and I will get it taken care of. I apologize for any miscommunication or misunderstanding as it was not my intention for this to happen. This was my first campaign for an elected position, and I did my very best to follow MCFA to the best of my abilities.

I will await further reply.

Sincerely,

A handwritten signature in cursive script that reads "Stefanie Boone". The signature is written in dark ink and is positioned above the printed name.

Stefanie Boone



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

January 31, 2023

Stefanie Boone for Kent County Commissioner
2205 Knollpoint Dr. NE
Ada, MI 49301

Re: *Sullivan v. Stephanie Boone for Kent County Commissioner*
Campaign Finance Complaint No. 23-003

Dear Stephanie Boone for Kent County Commissioner:

The Department of State (Department) has received a formal complaint filed against you by Gerard Sullivan alleging that you violated the Michigan Campaign Finance Act (MCFA or Act). Specifically, the complaint alleges that you made expenditures for advertisements that were not included in your pre-primary campaign finance report, filed with Kent County July 20, 2022. The Department confirmed independently that an expenditure for the cost of the advertisements does not appear to be accounted for in the report. 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).

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,

Stefanie Boone for Kent County Commissioner
Page 2

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. Sullivan, who will have an opportunity to submit a rebuttal statement to the Department. After reviewing the statements and materials provided by the parties, the Department will determine whether "there may be reason to believe that a violation of [the MCFA] has occurred [.]" MCL 169.215(10). Note that the Department's enforcement powers include the possibility of entering a conciliation agreement, conducting an administrative hearing, or referring this matter to the Attorney General for enforcement.

If you have any questions concerning this matter, you may contact the Regulatory Section of the Bureau of Elections at BOERegulatory@Michigan.gov.

Sincerely,

Regulatory Section
Bureau of Elections
Michigan Department of State

Enclosure
c: Gerard Sullivan



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

February 22, 2023

Gerard Sullivan
3775 Blackhawk Dr. SW
Grandville, MI 49418

Re: *Sullivan v. Stefanie Boone for Kent County Commissioner*
Campaign Finance Complaint No. 23-003

Dear Mr. Sullivan:

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

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

Sincerely,

Regulatory Section
Bureau of Elections
Michigan Department of State

Enclosure
c: Stefanie Boone



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

March 29, 2023

Stefanie Boone for Kent County Commissioner
2205 Knollpoint Dr. NE
Ada, MI 49301

Re: *Sullivan v. Stefanie Boone for Kent County Commissioner*
Campaign Finance Complaint No. 23-003

Dear Ms. Boone:

The Department of State (Department) has finished investigating the campaign finance complaint filed against you by Gerard Sullivan alleging that you violated the Michigan Campaign Finance Act (MCFA or Act). This letter concerns the disposition of that complaint.

The complaint alleged that you made expenditures for advertisements that were not included in your pre-primary campaign finance report, filed with Kent County July 20, 2022. The Department confirmed independently that an expenditure for the cost of the advertisements does not appear to be accounted for in the [report](#).

You responded to the complaint in a letter received by the Department on February 8, 2023. In your response, you thanked the Department for bringing the issue to your attention and acknowledged that there had been an oversight on your part. You stated that you used your personal credit card in making the expenditure in question and failed to account for the expense in your report. You stated that you filed an [amended report](#) on February 5, 2023 to disclose the expenditure, and that you are willing to take other actions to address the matter.

While the complaint alleged that the expenditure should have been included in your pre-primary report, that report covered activity running through July 17, 2022; as the payment was made on July 28, 2022, you correctly included it in your post-primary report, which covers the period from July 18, 2022 to August 22, 2022.

In a letter dated February 22, 2023, the Department provided Mr. Sullivan the opportunity to submit a rebuttal statement; to date, no rebuttal has been received.

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).

Upon review of the evidence submitted, the Department finds that sufficient evidence has been presented to support a finding of a potential violation of the MCFA. After reaching this conclusion, the Act requires the Department to "endeavor to correct the violation or prevent a further violation by using informal methods" if it finds that "there may be reason to believe that a violation ... has occurred [.]". MCL 169.215(10). The objective of an informal resolution is "to correct the violation or prevent a further violation." *Id.*

You acknowledged in your response that you did not realize that you were out of compliance with the MCFA. Once you were made aware, you amended your report and indicated that you would take any other necessary steps to remedy the matter.

Given the steps you took to address the violation, the Department has determined that a formal warning is a sufficient resolution to the complaint and will consider this matter concluded.

Sincerely,



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

c: Gerard Sullivan