



Michigan Department of State Campaign Finance and Financial Disclosure Complaint Form

This complaint form may be used to file a complaint alleging that someone violated the [Michigan Campaign Finance Act](#) (MCFA), the [Candidate for Office Financial Disclosure Act](#), or the [Public Officers Financial Disclosure Act](#) (financial disclosure acts). Electronic submission of the form to BOERegulatory@michigan.gov is strongly recommended. For instructions on how to complete this form, see the [Campaign Finance and Financial Disclosure Complaint Guidebook](#) document. All spaces are required unless otherwise indicated.

Section 1. Complainant

Your name <i>Ann Clayton</i>		Daytime telephone number <i>989-965-1966</i>
Mailing address <i>1655 Timothy St.</i>		
City <i>Gladwin</i>	State <i>MI</i>	Zip <i>48624</i>
Email (recommended) <i>Ann.manning@gladwincounty-mi.gov</i>		

Section 2. Alleged Violator (Respondent)

Name <i>Lisa Pollock</i>		
Mailing address <i>4685 Butman Rd.</i>		
City <i>Gladwin</i>	State <i>MI</i>	Zip <i>48624</i>
Email (recommended) <i>gregandlisa2001@gmail.com</i>		
Committee ID (optional) <i>2024021</i>		

Please include email addresses to expedite processing time and mitigate mail delays.

Section 3. Allegations *(use additional sheets if more space is needed)*

I allege a violation of the following:

- ☒ MCFA
- ☐ Public officer disclosure
- ☐ Candidate disclosure

ELECT



LISA

POLITOCK

REGISTER OF DEEDS

Identify the section(s) of the MCFA or relevant financial disclosure act section(s) alleged to be violated and explain how the section(s) were violated:

MCL
169.247 (Sec 47)(1)

Candidate failed to display an identification that contains the name and address of the person paying for the matter. This campaign ad is on the back of the Candidates truck window.

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

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.



Signature of complainant

7/15/2024

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:

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 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. MCL 169.215(16).

The financial disclosure acts prohibit a person from filing a complaint with a false certification. MCL 169.313(7); MCL 15.713(7).

Section 6. Submission

Once completed, submit the complaint form with your evidence to BOERegulatory@Michigan.gov. Alternatively, you may mail or hand deliver the complaint form with your evidence to the address below. The complaint is considered filed upon receipt by the Bureau of Elections.

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



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

July 24, 2024

Lisa Pollock
4685 Butman Road
Gladwin, MI 48624

Re: *Clayton v. Pollock*
Campaign Finance Complaint No. 24-085

Dear Lisa Pollock:

The Department of State (Department) has received a formal complaint alleging you have violated MCL 169.247 of the Michigan Campaign Finance Act (MCFA) by failing to include an identification statement on your campaign sign. A photo of the sign was included with the complaint; a copy of the complaint is enclosed.

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).

Upon review, the evidence submitted supports the conclusion that a potential violation of the Act has occurred. From the outset, the Department must consider whether the materials fall within the ambit of the MCFA. Because the materials explicitly advocate for the election or defeat of a candidate, or for the passage or defeat of a ballot proposal, the materials contain express advocacy as defined by the Act. MCL 169.206(2)(j). As explained above, such materials must contain a "paid for by" statement listing the name and address of the committee purchasing the materials. However, the evidence shows that the materials at issue here omit part or all of that required statement. That absence supports the conclusion that a potential violation of the MCFA has occurred.

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

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

Note that all printed materials referencing you or your candidacy produced in the future must include this identification statement. For all materials currently in circulation, the paid for by statement must be corrected. If this information has been included in your materials and you wish to rebut the Department's conclusion, you must respond in writing to the Department to BOERegulatory@Michigan.gov within 15 business days of the date of this letter. Otherwise, the Department will treat the complaint as resolved.

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

Sincerely,

Regulatory Section
Bureau of Elections
Michigan Department of State

Enclosure
c: Ann Clayton

From: [Lisa Pollock](#)
To: [MDOS-BOERegulatory](#); ann.manning@gladwincounty-mi.gov
Subject: Campaign Finance Complaint No 24-085 Clayton Vs Pollock
Date: Monday, July 29, 2024 6:16:02 PM

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

Good Afternoon,

I received in the mail today the complaint filed against me, Lisa Pollock. I wanted the opportunity to prove that in fact the "Paid for by committee to Elect" verbiage is underneath the sign on my truck window as is on all of my campaign signs.

I am attaching two pictures to prove that this has been there, and wanted to clear up the false accusation..

Thank you for your time,

Lisa Pollock

REGISTER OF DEEDS

Paid for by the committee to elect Lisa Pollock Register of Deeds 4685 Butman Road Gladwin MI 48135

ELECT ★ LISA
POLLOCK
REGISTER OF DEEDS

Presented by the committee to elect Lisa Pollock, Register of Deeds 4655 Summer Road, Galveston, TX 77551



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

September 4, 2024

Ann Clayton
1655 Timothy Street
Gladwin, MI 48624

Re: *Clayton v. Pollock*
Campaign Finance Complaint No. 24-085

Dear Ann Clayton

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

You may file a rebuttal statement after reviewing the 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

Attachment
c: Ann Clayton



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

December 6, 2024

Lisa Pollock
4685 Butman Road
Gladwin, MI 48624

Re: *Clayton v. Pollock*
Campaign Finance Complaint No. 24-085

Dear Lisa Pollock:

The Department of State (Department) has finished investigating the campaign finance complaint filed against you by Ann Clayton 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 did not include the required identification statement on campaign materials.

You responded to the complaint. In your response, you included an enlarged photo of the sticker on your truck. Including the identification statement.

Ann Clayton did not provide a rebuttal statement.

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

The Department has reviewed the evidence submitted in this matter and finds that sufficient evidence has been presented to support a finding of a potential violation of the MCFA. Administrative Rule 169.36(1) provides that "[p]rinted material having reference to an election, a candidate, or a ballot question shall bear the identification or disclaimer, or both, provided in section 47 of the act in a place and in a print clearly visible to and readable by an observer." Because of this Rule, the Department finds your car sticker does not meet the requirements. Additionally, you did not provide proof other than your word that your campaign signs include the identification statement, thus, the Department is unable to conclude that your signs meet the requirements.

After reaching this conclusion, the Act requires the Department to “endeavor to correct the violation or prevent a further violation by using informal methods” if it finds that “there may be reason to believe that a violation ... has occurred [.]” MCL 169.215(10). The objective of an informal resolution is “to correct the violation or prevent a further violation.” *Id.*

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

Note that all printed materials referencing you or your candidacy produced in the future must include this identification statement. For all materials currently in circulation, the paid for by statement must be corrected. Please be advised that this notice has served to remind you of your obligation under the Act to identify your printed matter and may be used in future proceedings as evidence that tends to establish a knowing violation of the Act. A knowing violation is a misdemeanor offense and may merit referral to the Attorney General for enforcement action. MCL 169.247(6), 215(10).

Sincerely,

A handwritten signature in dark ink, appearing to read "James Biehl". The signature is written in a cursive, flowing style.

James Biehl, Regulatory Attorney
Regulatory Section
Bureau of Elections
Michigan Department of State