



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		Daytime telephone number
Mailing address		
City	State	Zip
Email (<i>recommended</i>)		

Section 2. Alleged Violator (Respondent)

Name		
Mailing address		
City	State	Zip
Email (<i>recommended</i>)		
Committee ID (<i>optional</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

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:

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.

Julie Beaty

11/4/2024

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:

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



Vote **EARNESTINA**

MOORE
for

**West Bloomfield
School Board**

Paid for by the candidate



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

November 21, 2024

Earnestina Moore
3829 Terrybrook Rd.
West Bloomfield, MI 48322

Re: *Beaty v. Moore*
Campaign Finance Complaint No. 24-301

Dear Earnestina Moore:

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 signs. A photo of your 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

c: Julie Beaty

From: [Earnestina Moore](#)
To: [MDOS-BOERegulatory](#)
Cc: [Earnestina Moore](#); [Tina Moore](#)
Subject: Fwd: Beaty v. Moore Campaign Finance Complaint No. 24-301
Date: Saturday, January 4, 2025 12:04:59 AM

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

This email will acknowledge my receipt of a complaint filed against me by Julie Beaty, and requested attachments. After reviewing the requested documentation, I paid particular attention to the filing date-November 4, 2024-which was just one day prior to the election. The date is of particular importance because I began placing my signs in August 2024, yet this complaint was not filed until November 4, 2024. As illustrated in the attached photograph, my signs had the requested verbiage that was placed using weatherproof tape. (See attached) While the tape was intended to withstand the elements, it is not intended to withstand its intentional removal. While I can't say if it were Mrs. Beaty or someone at her direction, who removed the noted verbiage, neither would surprise me given the antics and malicious actions that have been specifically directed at me during the course of my campaign for the West Bloomfield School Board. It should also be noted that my campaign flyer was not provided, because it too is complaint with MCL 169.247. Presumably, because it wouldn't be so easy to remove as, the verbiage from my campaign sign, as I think Mrs. Beaty lacks the skill set or computer savvy to edit the flyer. It should also be noted that during my previous campaign for West Bloomfield School Board in 2022, I used the same campaign signs-without any complaints filed. And, that was in a much more competitive race with a field of 10 candidates. Yet, again, no complaints were filed.

As I previously stated, Mrs. Beaty's filing is more a reflection of her being threatened by my campaign and the significant amount of free time she has to try and conjure up something to derail my campaign. Given the timing of her filing this was a political hail Mary to attack me and/or my campaign. As the only African-American candidate for the school board, I can't help but wonder the exact motivation behind these antics that were clearly done by Mrs. Beaty as an avenue to seek a political advantage.

I would advise Mrs. Beaty that if she put as much time and effort into filing complaints into her campaign, then she would not feel so threatened that she needed to resort to a political stunt for a position on the West Bloomfield School Board. Her efforts would be better directed and received by the students and community as a whole, if she were doing something to actually move the district forward-instead of resorting to such accusations. As a long-term board member and incumbent, Mrs. Beaty has done little to advance the educational endeavors of our student population. As a part of the district's voting block, which approved no-bid contracts, and administrative raises for a school district who according to the 2024 M-Step has roughly 35% of its middle school students who are proficient. West Bloomfield's school district currently lags significantly behind other Oakland County school districts in test scores. West Bloomfield's school district only fares slightly better than Southfield, Oak Park, Pontiac, and Ferndale public school districts. The other Oakland County school districts fare significantly better than West Bloomfield.

The behavior displayed by the candidates for this elected position has been very disappointing to say the least. The moral turpitude or lack thereof for people who are supposed to be acting in the best interest of our community and district is reprehensible-simply for a seat on the school board.

Since the election is over, and Mrs. Beaty retained her seat, I hope she will direct her efforts toward the betterment of the school district and community. Given her board track record and campaign behavior, I question whether she really wants to advance the school district or sought re-election to elevate her social status within the community. Taking steps to advance the school district, may be a

tall task for someone who for years hasn't had a student attending a school within the West Bloomfield School District. Furthermore, her actions are continuing to display the behavior that has arguably resulted in our school district's current state: continued student achievement gaps, declining student enrollment, and a budget deficit. I am fortunate to not have to serve or work alongside Mrs. Beaty. I, and I'm sure others in the district, would appreciate Mrs. Beaty's time being better spent pushing our school district past the status quo and be a free-thinker standing on her own merit. And, not that of others i.e. being a part of a voting block or running on a slate. This complaint filing begs the question what would Mrs. Beaty have done/alleged had she not retained her seat?!

Sincerely,

Earnestina Moore, Esq.

----- Forwarded message -----

From: **Earnestina Moore** <moore4wbschoolboard@gmail.com>

Date: Wed, Dec 25, 2024 at 8:12 AM

Subject: Re: Beaty v. Moore Campaign Finance Complaint No. 24-301

To: MDOS-BOERegulatory <MDOS-BOERegulatory@michigan.gov>

Good morning and Merry Christmas. Thank you for sending the attached. I am traveling, but upon return will respond fully to this malicious filing.

Thanks again for providing the attachments that were not originally provided.

On Wednesday, December 18, 2024, MDOS-BOERegulatory <MDOS-BOERegulatory@michigan.gov> wrote:

Please see the attached.

Bureau of Elections, Regulatory Division

Michigan Department of State

Secretary of State Jocelyn Benson

P.O. Box 20126

Lansing, Michigan 48901

From: Earnestina Moore <moore4wbschoolboard@gmail.com>

Sent: Thursday, December 5, 2024 12:49 PM

To: MDOS-BOERegulatory <MDOS-BOERegulatory@michigan.gov>

Cc: Earnestina Moore <moore4wbschoolboard@gmail.com>

Subject: Beaty v. Moore Campaign Finance Complaint No. 24-301

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

This email will acknowledge my receipt of a complaint filed against me by Julie Beaty. The letter references attachments, however, I am only in receipt of the letter dated November 16, 2024. There are no attachments, so I would appreciate someone sending me the complete filing/complaint, so that I can respond accordingly.

Without having the above information, I can say that whatever Mrs. Beatty filed is more a reflection of her being threatened by my campaign and a significant amount of free time she has to try and conjure up something to derail my campaign. As the only African-American candidate for the school board, I can't help but wonder the exact motivation behind these antics that are clearly done by Mrs. Beaty as an avenue to seek a political advantage.

I would advise Mrs. Beaty that if she put as much time and effort into whatever her complaint is into her campaign, then she would not feel threatened such that she needed to resort to such a political stunt for a position on the West Bloomfield School Board. Her efforts would be better directed and received by the students and community as a whole. As a long-standing board member and incumbent, Mrs. Beaty has done little to advance the educational endeavors of our student population. As a part of the district's voting block, which approved no-bid contracts, administrative raises for a school district who according to the 2024 M-Step has roughly 35% of its middle school students who are proficient. And a school district (West Bloomfield) that significantly lags behind other Oakland County School Districts, we only fare slightly better than Southfield, Oak Park, Pontiac, and Ferndale public schools. The other Oakland county school districts, some of which are significantly ahead of West Bloomfield

The behavior displayed by the candidates for this elected position has been very disappointing to say the least. The moral turpitude or lack thereof for people who are supposed to be acting in the best interest of our community and district is reprehensible-simply for a seat on the school board.

Since the election is over, I hope that Mrs. Beaty will direct her efforts toward the betterment of the school district and community. Given her board track record and campaign behavior, I question whether she really wants to advance the school district or elevate her social status within the community. This may be a tall task for someone who for years hasn't had a student attending a school within the West Bloomfield School District. Furthermore, her actions are continuing to display the behavior that has our school district in its current state significantly lagging behind our neighboring school districts. I am fortunate to not have to serve or work alongside Mrs. Beaty. I, along with others in the district, would appreciate her time being better spent pushing our school district past the status quo and be a free-thinker standing on her own merit. And, not that of others i.e. being a part of a voting block or running on a slate.

I will await and look forward to receiving the complete complaint filed by Mrs. Beaty, so that I can respond accordingly.

Thanks in advance for your cooperation.

Earnestina Moore, Esq.

Vote EARNESTINA
MOORE
for

**West Bloomfield
School Board**

Paid for by the candidate

Committee to Elect Earnestina Moore 3829 Terrybrook Rd. West Bloomfield, MI 48322