

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 Ryan J. GILBERT	Daytime Telephone Number 269 598 7744	
Mailing Address 37049 34TH AVE		
City Paw Paw	State MI	Zip 49079

Section 2. Alleged Violator		
Name DANIEL SEIBERT		
Mailing Address 31110 52ND AVE		
City Paw Paw	State MI	Zip 49079

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

Section(s) of the MCFA violated:
169 247

Explain how those sections were violated:
Complaint typed and attached

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

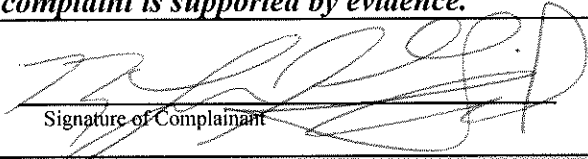
ATTACHED

RECEIVED
 MICHIGAN DEPARTMENT OF STATE
 CAMPAIGN FINANCE DIVISION
 APR 10 2012

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

10-11-18
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

Disclaimer Violation. 169.247 requires any printed material to identify the name and address of who paid for it. This is basic campaign finance law. Mr. Siebert and his consultant, Rene Rodriguez, should know this as Mr. Rodriguez has consulted on many campaigns before. Mr. Siebert and Mr. Rodriguez gave the attached "Know the Facts" flyers to a voter at lunch on 10-10-18 at Amore Pizza, 117 W. Michigan Ave, Paw Paw, MI, in hopes of swaying votes. The flyer contains the same information found on other campaign materials and his website. See the attached flyers, Facebook post, and web address below.

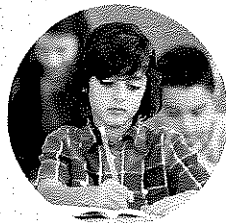
<https://seibertforstaterep.com/knowthefacts/>

KNOW THE FACTS

WHAT BETH GRIFFIN SAYS VS. HOW SHE VOTES

POLITICAL TALK

BETH GRIFFIN SAYS
SHE SUPPORTS
PUBLIC SCHOOLS



CHECK BETH'S VOTING RECORD HERE:

<https://www.michiganvotes.org>

CHECK BETH'S CAMPAIGN FINANCES HERE:

<https://www.followthemoney.org>

THE FACTS

**Beth Griffin Vote: Yes on SB574
1/18/18**

The Special Interest:

The DeVos family (billionaire charter school advocates)
Great Lakes Education Project (GLEP receives funding from the DeVos family)

The Money:

\$9,000 since 2016 from the DeVos family
\$750 since 2016 in direct contributions from GLEP
\$10,912.25 since 2016 in campaign spending by GLEP

Under Michigan law, voters can approve a local property tax Regional Enhancement Millage of up to 3 mills for their intermediate school districts. This **funding goes to local school district** general operating funds and was intended to give communities an option to supplement school funding from the state.

In 2018 the Michigan legislature approved SB574 which allows charter schools (**80% are run by for-profit businesses**) access to these voter-approved funds. By redirecting crucial dollars from traditional public schools to for-profit charter schools, these bills allow millions of tax dollars to go to executive compensation and shareholder dividends.

It's not about fairness, because traditional public schools have additional required expenses compared to charter schools, such as transportation and special education.

Keep in mind that due to Michigan's lax oversight of charter schools, they have

- No legal responsibility to spend funding to educate children
- No public accountability or transparency of how tax dollars are spent
- A fiduciary responsibility to maximize return to their shareholders

KNOW THE FACTS

WHAT BETH GRIFFIN SAYS VS. HOW SHE VOTES

POLITICAL TALK

BETH GRIFFIN SAYS
SHE SUPPORTS
VETERANS



CHECK BETH'S VOTING RECORD HERE:

<https://www.michiganvotes.org>

CHECK BETH'S CAMPAIGN FINANCES HERE:

<https://www.followthemoney.org>

THE FACTS

**Beth Griffin Vote: Yes on HB5456
3/21/18**

The Special Interest:
The Michigan Chamber of Commerce

The Money:
\$13,500 lifetime from the Michigan
Chamber of Commerce
(\$1,000 on 3/2/18)

From diagnosis, on average victims of mesothelioma only have 12-18 months life expectancy. Given the nature of their work, veterans and first responders are often exposed to hazards that places them at a significantly increased risk for asbestos related illness (**over 30% of those afflicted are veterans**).

“Delay, deny until they die”

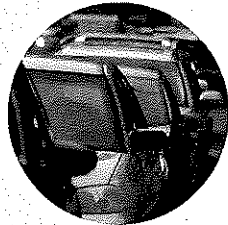
It's another example of politicians like Rep. Beth Griffin putting special interests first. She voted in favor of HB5456 which was **opposed by both the American Legion and the Michigan Professional Fire Fighters.** This bill was crafted to protect industry profits by making it more expensive and time-consuming for victims to get compensation, **a tactic referred to as “delay, deny until they die.”**

KNOW THE FACTS

WHAT BETH GRIFFIN SAYS VS. HOW SHE VOTES

POLITICAL TALK

BETH GRIFFIN SAYS
SHE SUPPORTS
ACCOUNTABILITY



CHECK BETH'S VOTING RECORD HERE:
<https://www.michiganvotes.org>

CHECK BETH'S CAMPAIGN FINANCES HERE:
<https://www.followthemoney.org>

THE FACTS

Beth Griffin Vote: Yes on SB652-653
5/21/18

The Special Interest:

The Michigan Chamber of Commerce
DTE Energy
CMS Energy

The Money:

\$13,500 since 2016 from the Michigan Chamber of Commerce (\$2,500 on 6/11/18)
\$10,500 since 2016 from DTE Energy (\$2200 on 6/11/18)
\$4,500 since 2016 from Consumers Energy (\$1,000 on 6/9/18)

Whether it's Enbridge Energy **spilling 1,000,000 gallons of oil in the Kalamazoo River** or Parchment dealing with an abandoned paper mill **contaminating their drinking water**, the need for environmental oversight is apparent. Yet in 2018 the Michigan legislature voted to approve SB652-653. These bills create oversight panels with final say over permits and standards at the Michigan Department of Environmental Quality. Members of these panels **aren't required to even live in Michigan** and aren't elected, but rather appointed by the Governor. Even worse, SB652 specifically **allows active lobbyists to serve** on the Environmental Rules Review Committee.

By allowing industry stakeholders and lobbyists to have the final say over the MDEQ, we are letting the polluters regulate themselves. The **MDEQ already approved 99.5% of permits in 2017**, but apparently that's still not enough.

KNOW THE FACTS

WHAT BETH GRIFFIN SAYS VS. HOW SHE VOTES

POLITICAL TALK

BETH GRIFFIN SAYS
SHE IS FISCALLY
RESPONSIBLE



CHECK BETH'S VOTING RECORD HERE:

<https://www.michiganvotes.org>

CHECK BETH'S CAMPAIGN FINANCES HERE:

<https://www.followthemoney.org>

THE FACTS

Beth Griffin Vote: Yes on SB111-115
5/4/2017

Beth Griffin Vote: Yes on SB242-244
7/12/2017

The Special Interest:

Dan Gilbert (billionaire real estate developer)
Foxconn (Taiwan-based corporation)

The Money:

\$1.2 billion in corporate handouts

After more than **\$150,000 in lobbying** in 2017, billionaire Dan Gilbert (the wealthiest person in Michigan) secured passage of SB111-115. Gilbert sought these bills, offering up to **\$1 billion in tax credits** to developers, as part of his plan to redevelop the Hudson store site in Detroit which is **projected to create few, if any, permanent jobs**.

Later in 2017, Michigan passed SB242-244 which was written to let Taiwan-based Foxconn **keep up to \$200 million worth of income taxes paid by its employees**. In total Michigan offered Foxconn a total of \$3.8 billion of "incentives".

In less than 2 years in office, **Beth Griffin voted for more than \$1.2 billion in corporate handouts**. That's money that could have been spent on schools or roads or investing in our communities.

Sign Up

Email or Phone

Password

Log In

[Forgot account?](#)



Dan Seibert for State Representative

17 hrs ·

Michigan has some of the highest auto-insurance rates in the nation, 136% percent higher than the national average. Yet after 8 years of complete control over Michigan's government, Republicans have done nothing to help.

The only vote in the State House on auto-insurance reform in the last 2 years was for a bill that would have added up to \$150 million per year in costs to Michigan taxpayers. The bill (HB5013) was written by insurance industry lobbyists and was so bad that many Republicans voted with Democrats to defeat it.

Beth Griffin, however, listened to her biggest campaign donors and voted yes.

Get the facts about the vote AND the money behind it:

<https://seibertforstaterep.com/KnowTheFacts>

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STATE OF MICHIGAN
RUTH JOHNSON, SECRETARY OF STATE
DEPARTMENT OF STATE
LANSING

October 22, 2018

Daniel Siebert
31110 52nd Avenue
Paw Paw, Michigan 49079

Re: *Gilbert v. Seibert*
Campaign Finance Complaint
No. 2018-10-80-47

Dear Mr. Siebert:

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 a complete and correct identification statement on certain campaign-related materials.

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 Act also 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.*

At issue in the complaint are three handouts all entitled "Know the Facts." The handouts provide information related to certain votes and Michigan's law. Upon review, it appears that the paid for by statement is omitted entirely from these campaign materials potentially in violation of MCL 169.247. Mr. Gilbert has alleged that you handed these materials out and they are located on your website and Facebook page.

Given this, the Department 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.

Daniel Siebert
October 22, 2018
Page 2

Note that all printed materials published by your campaign that refer to an election or your candidacy produced in the future must include this identification statement. For all materials currently in circulation that refer to your candidacy, the paid for by statement must be corrected/included if not already.

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).

The Department considers the instant action closed and resolved.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam Fracassi". The signature is stylized and cursive.

Adam Fracassi
Bureau of Elections
Michigan Department of State

c: Ryan Gilbert