

Campaign Finance Complaint Form
Michigan Department of State

NOT RECORDED
MICHIGAN DEPT OF STATE
JUL 13 PM 1:55

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 Jennifer K. Hutton		Daytime Telephone Number 517 410 8568
Mailing Address 1608 Alpha St		
City Lansing	State MI	Zip 48910

Section 2. Alleged Violator		
Name The Committee To Elect Ayanna Neal Judge		
Mailing Address PO Box 16215		
City Lansing	State MI	Zip 48901

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

Section(s) of the MCFA violated: section 47

Explain how those sections were violated:

See attached addendum

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

See attached ad archive print out

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

Jennifer R. Hutton
Signature of Complainant

Date

10-18-2018

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

Campaign Finance Complaint Form- Addendum

Alleged Violator- The Committee to Elect Ayanna Neal Judge

Paid Advertising on Facebook without the full identification statement as required by the Michigan Campaign Finance Act

Facebook archives all paid advertisements with political content. Anyone can search the archives at the link below or with a Google Search for "Facebook Ads Archive".

[https://www.facebook.com/ads/archive/?active_status=all&ad_type=political and issue ads&country=US](https://www.facebook.com/ads/archive/?active_status=all&ad_type=political_and_issue_ads&country=US)

Many of the Committee to Elect Ayanna Neal Judge's **paid** Facebook ads do not contain the full candidate identification as required by section 47 of the Michigan Campaign Finance Act, MCL 169.247 and Administrative Rule 169.36.

As of October 16, the following paid Facebook ads do not contain the full identification statement as required by the MCFA:

1. Paid Ad referencing "bring me a yard sign" started running on October 15, 2018. Identification only states Paid for by the Committee to Elect Ayanna Neal Judge. There is no mailing address included as required by law.
2. Paid Ad referencing Greater Lansing Labor Council. Identification only states Paid for by the Committee to Elect Ayanna Neal Judge. There is no mailing address included as required by law.
3. Paid Ad referencing WMLA. Identification only states Paid for by the Committee to Elect Ayanna Neal Judge. There is no mailing address included as required by law.

4. Paid Ad referencing IBEW Local 665. Identification only states Paid for by the Committee to Elect Ayanna Neal Judge. There is no mailing address included as required by law.
5. Paid Ad referencing Judge O'Neil. Identification only states Paid for by the Committee to Elect Ayanna Neal Judge. There is no mailing address included as required by law.
6. Paid Ad referencing Judge Giddings. Identification only states Paid for by the Committee to Elect Ayanna Neal Judge. There is no mailing address included as required by law.
7. Paid Ad mentioning Judge Lillard. Identification only states Paid for by the Committee to Elect Ayanna Neal Judge. There is no mailing address included as required by law.
8. Paid Ad referencing Judge Canady. Identification states Paid for by the Committee to Elect Ayanna Neal Judge. There is no mailing address included as required by law.
9. Paid Ad referencing Ingham County Democratic Party. Identification only states Paid for by the Committee to Elect Ayanna Neal Judge. There is no mailing address included as required by law.
10. Paid Ad with Whitmer. Identification only states Paid for by the Committee to Elect Ayanna Neal Judge. There is no mailing address included as required by law.
11. Paid Ad referencing Judge Allen. Identification only states Paid for the Committee to Elect Ayanna Neal Judge. There is no mailing address included as required by law.
12. Paid Ads with Helen Keller quote. Identification only states Paid for the Committee to Elect Ayanna Neal Judge. There is no mailing address included as required by law.

13. Paid Ad referencing Justice Wilder. Identification only states Paid for by the Committee to Elect Ayanna Neal Judge. There is no mailing address included as required by law.
14. Paid Ad referencing an Eaton County Commissioner. Identification only states Paid for by the Committee to Elect Ayanna Neal Judge. There is no mailing address included as required by law.
15. Paid Ad referencing Judge Economy. Identification only states Paid for by the Committee to Elect Ayanna Neal Judge. There is no mailing address included as required by law.
16. Paid Ad referencing Judge Baird. Identification only states Paid for by the Committee to Elect Ayanna Neal Judge. There is no mailing address included as required by law.
17. Paid Ad referencing Judge Jamo. Identification only states Paid for by the Committee to Elect Ayanna Neal Judge. There is no mailing address included as required by law.
18. Paid Ad referencing Plumbers and Pipefitters. Identification only states Paid for by the Committee to Elect Ayanna Neal Judge. There is no mailing address included as required by law.
19. Paid Ad with a group of local clergies. Identification only states Paid for by the Committee to Elect Ayanna Neal Judge. There is no mailing address included as required by law.

Michigan Campaign Finance Website (MERTS) provides the following guidance for when an identification statement is needed:

STEPS TO DETERMINE IF AN IDENTIFICATION/DISCLAIMER STATEMENT IS NEEDED:

The following step by step instructions and sample wording are provided to assist committees and others in determining if an identifier/disclaimer is needed on a communication and what the identifier should contain. There are two (2) sets of instructions:

- **Candidates and Candidate Committees**
- **All others**

CANDIDATE AND CANDIDATE COMMITTEES

PRINT	RADIO/TV	ROBO-CALLS	ELECTRONIC MEDIA
Printed matter such as signs, posters, fliers, billboards, newspapers, novelty items, mass mailings etc.	Radio and TV Advertisement	Robotic calls	Websites (Free social media such as Facebook, Twitter and emails are exempt)
Note: SAMPLE WORDING ONLY; SUBSTITUTE ACTUAL NAME/ADDRESS INFORMATION.			
"Paid for by the CTE Joe Smith, 123 Winners Lane, Lansing Michigan 48933" Unless the item is exempt; see list below.	Must comply with FCC rules and bear the name of the payer	"Paid for by the CTE Joe Smith, 123 Winners Lane, Lansing Michigan 48933" (<i>The address can be substituted with a phone number or other contact information.</i>)	"Paid for by the CTE Joe Smith, 123 Winners Lane, Lansing Michigan 48933"

R 169.36 Printed material or other campaign media; identification or disclaimer; exemption. Rule 36. (1) Printed 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. Any other medium used for campaign purposes shall clearly and unequivocally include the identification or disclaimer, or both, provided in section 47 of the act. (2) The identification required by section 47 of

the act for printed material shall include the words "Paid for by," followed by the full name of the person or committee paying for the material and the person's or committee's street number or post office box, city or town, state, and zip code. A disclaimer shall be in the same form as an identification, except that it shall be preceded by the phrase "Not authorized by the candidate committee of (candidate's name)."

(3) A campaign item, the size of which makes it unreasonable to add an identification or disclaimer, or both, as designated by the secretary of state, is exempted from this rule.

The Committee to Elect Ayanna Neal Judge's Facebook ads are electronic media as identified above and were not free. They were paid advertising. See attached evidence.

ayanna neal

Filter results by

Search results include ads with text that matched your search term, as well as ads from Pages whose names matched your search. [Learn more](#)

Country

All

Brazil

United Kingdom

U.S.

Type of Ad

Political and Issue

News

Ad Status

All

Active Ads

Inactive Ads

Pages

All

Choose a Page...

[See Ad Performance](#)

Ads launched in October 2018

● Active

Started running on Oct 15, 2018

Paid for by The Committee to Elect Ayanna Neal Judge

Ayanna Neal for Lansing Judge
Sponsored • Paid for by The Committee to Elect Ayanna Neal Judge

Show your support of Ayanna Neal for 54-A Lansing District Judge by displaying a yard sign! Please send a message with your name and address and we'll bring you a yard sign! #supportLansingsown #homegrown #ExperienceMatters



WED, OCT 17, 2018 - SAT, OCT 27, 2018

Please bring me a Yard sign!

[View Event](#)

Lansing, Michigan

Please bring me a Yard sign!

[See Ad Performance](#)

● Active

Started running on Oct 12, 2018

Paid for by The Committee to Elect Ayanna Neal Judge

Ayanna Neal for Lansing Judge
Sponsored • Paid for by The Committee to Elect Ayanna Neal Judge

Thank you President Paul Hufnagel and the Greater Lansing Labor Council for your endorsement and support! #supportlabor #loveLansing



Ayanna Neal for Lansing Judge

[Send Mess...](#)[See Ad Performance](#)

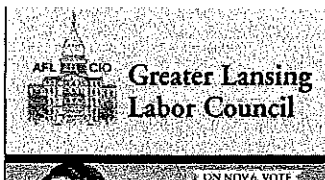
● Inactive

Started running on Oct 11, 2018

Paid for by The Committee to Elect Ayanna Neal Judge

Ayanna Neal for Lansing Judge
Sponsored • Paid for by The Committee to Elect Ayanna Neal Judge

Thank you President Paul Hufnagel and the Greater Lansing Labor Council for your endorsement and support! #supportlabor #loveLansing



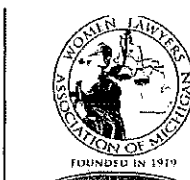
● Inactive

Oct 9, 2018 - Oct 14, 2018

Paid for by The Committee to Elect Ayanna Neal Judge

Ayanna Neal for Lansing Judge
Sponsored • Paid for by The Committee to Elect Ayanna Neal Judge

I am honored to have the Highly Recommended rating and endorsement from President MacKenzie and the Board of Directors of WLAM! Thank you!



● Inactive

Oct 4, 2018 - Oct 9, 2018

Paid for by The Committee to Elect Ayanna Neal Judge

Ayanna Neal for Lansing Judge
Sponsored • Paid for by The Committee to Elect Ayanna Neal Judge

Please vote for Ayanna Neal for Lansing Judge on November 6th! #ExperienceMatters #CompassionandIntegrity

Please vote for Ayanna Neal for Judge on November 6th! #ExperienceMatters...

[See Ad Performance](#)



Filter results by

See Ad Performance

Country

All

Brazil ☐ Inactive

Oct 2, 2018 - Oct 7, 2018

United Kingdom

U.S. ☒ Paid for by The Committee to Elect Ayanna Neal Judge

Type of Ad

Political and Sponsored • Paid for by The Committee to Elect Ayanna Neal Judge

News

Thank you IBEW Lansing Local 665 and Tom Eastwood for your endorsement and support! I will absolutely serve with excellence, integrity, patience and compassion.

Ad Status

All

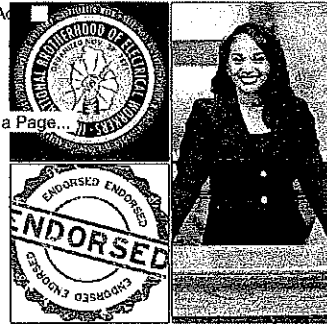
Active Ads ☒ #PERIENCEMATTERS

Inactive Ads

Pages

All

Choose a Page...



See Ad Performance

Ads launched in September 2018

☒ Inactive

Sep 28, 2018 - Oct 4, 2018

Paid for by The Committee to Elect Ayanna Neal Judge



Ayanna Neal for Lansing Judge
Sponsored • Paid for by The Committee to Elect Ayanna Neal Judge

Please vote for Ayanna Neal for Lansing Judge on November 6th! #ExperienceMatters #CompassionandIntegrity

Please vote for Ayanna Neal for Judge on November 6th! #ExperienceMatters...

See Ad Performance

☒ Inactive

Sep 27, 2018 - Sep 30, 2018

Paid for by The Committee to Elect Ayanna Neal Judge



Ayanna Neal for Lansing Judge
Sponsored • Paid for by The Committee to Elect Ayanna Neal Judge

Thank you Judge Julie O'Neill for your support and endorsement! #yourHometownchoice #voteAyannaNeal #Experiencematters



See Ad Performance

☒ Inactive

Sep 23, 2018 - Sep 28, 2018

Paid for by The Committee to Elect Ayanna Neal Judge



Ayanna Neal for Lansing Judge
Sponsored • Paid for by The Committee to Elect Ayanna Neal Judge

Please vote for Ayanna Neal for Lansing Judge on November 6th! #ExperienceMatters #CompassionandIntegrity

Please vote for Ayanna Neal for Judge on November 6th! #ExperienceMatters...

See Ad Performance

☒ Inactive

Sep 21, 2018 - Sep 24, 2018

☒ Inactive

Sep 20, 2018 - Sep 25, 2018

☒ Inactive

Sep 18, 2018 - Sep 23, 2018

Paid for by The Committee to Elect Ayanna Neal Judge

Paid for by The Committee to Elect Ayanna Neal Judge

Paid for by The Committee to Elect Ayanna Neal Judge

Filter results by

Country

All

Brazil

United Kingdom

U.S.

Type of Ad

Political and Issue

News

Ad Status

All

Active Ads

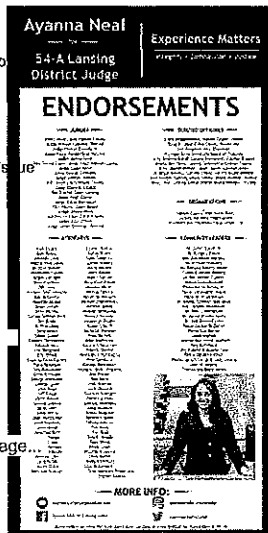
Inactive Ads

Pages

All

Choose a Page...

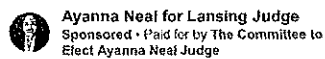
outpouring support from the community! Every voice and vote counts! Only 45 more days until election day, let's keep the momentum going! #ExperienceMatters #VoteAyannaNealNov6th



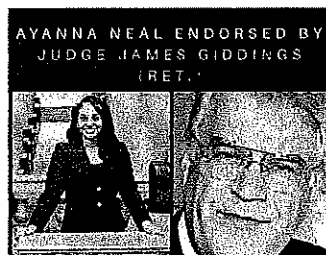
See Ad Performance

Inactive
Sep 16, 2018 - Sep 20, 2018

Paid for by The Committee to Elect Ayanna Neal Judge



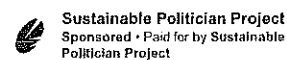
Thank you Judge Giddings for your support!
#experiencematters #crusaderforjustice
#VOTEAYANNA11618
#COURTROOMexperience #lovet.lansing



See Ad Performance

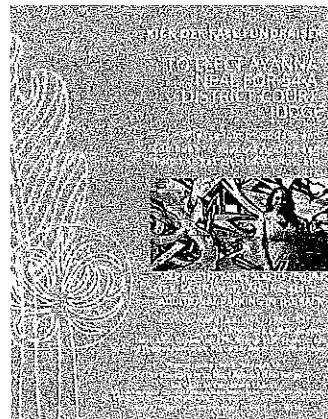
Inactive
Sep 4, 2018 - Sep 6, 2018

Paid for by Sustainable Politician Project



Massachusetts! Take a quick peek at your green politicians before your primaries tomorrow!

ROBERTSON, JAMIE WHITE & MILTON SCALES!



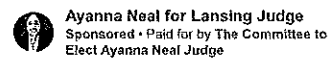
TUE, SEP 25, 2018
Fall Fundraiser to Support Ayanna for Lansing Judge
Cask & Company
Fall Fundraiser to Support Ayanna for Lansing Judge

View Event

See Ad Performance

Inactive
Sep 9, 2018 - Sep 14, 2018

Paid for by The Committee to Elect Ayanna Neal Judge



Thank you Judge Lillard for your support!
#prosecutors #courtroomexperience
#nosubstitute forexperience



See Ad Performance

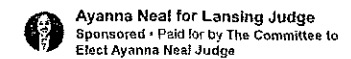
#CompassionandIntegrity

Please vote for Ayanna Neal for Judge on November 6th! #ExperienceMatters...

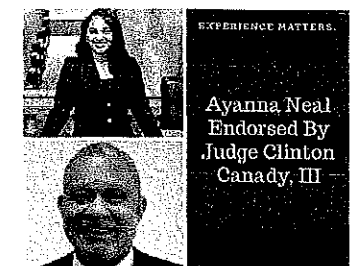
See Ad Performance

Inactive
Sep 1, 2018 - Sep 5, 2018

Paid for by The Committee to Elect Ayanna Neal Judge



Evident experience.
VOTE AYANNA NEAL on November 6, 2018.
Thank you Judge Canady for your support!



See Ad Performance

U.S. Senator Elizabeth Warren
 Congressman Richard Neal
 Congressman Jim McGovern

Filter results

Country

- All Massachusetts - Sustainable Politician Project
 Brazil Hey Massachusetts! Let's get right to it since your primary is coming up...
 United Kingdom SUSTAINABLEPOLITICIAN/PROJECT.CO
 U.S.

See Ad Performance

Type of Ad

- Political and Issue
 News

Ad Status

- All ☒ Inactive
 Active Ads Aug 26, 2018 - Sep 2, 2018

Inactive Ads Paid for by The Committee to Elect Ayanna Neal Judge

Pages

- All Ayanna Neal for 54-A District Court Judge
 Choose a Page Sponsored • Paid for by The Committee to Elect Ayanna Neal Judge

UNANIMOUSLY recommended by the ICDP Judicial Qualifications Committee for endorsement=ENDORSED by the INGHAM COUNTY DEMOCRATIC PARTY! Thank you! #EXPERIENCEMATTERS #VOTEAYANNA11618



See Ad Performance

Ads launched in August 2018

- ☒ Inactive
 Aug 24, 2018 - Aug 29, 2018

Paid for by The Committee to Elect Ayanna Neal Judge

Ayanna Neal for 54-A District Court Judge
 Sponsored • Paid for by The Committee to Elect Ayanna Neal Judge

VOTE NOVEMBER 6, 2018!
 #womenlawyers #Experiencethruexcellence
 #myformerboss #EXPERIENCEMATTERS



See Ad Performance

- ☒ Inactive
 Aug 20, 2018 - Aug 23, 2018

Paid for by The Committee to Elect Ayanna Neal Judge

Ayanna Neal for 54-A District Court Judge
 Sponsored • Paid for by The Committee to Elect Ayanna Neal Judge

Thank you Judge Allen for your support! A practicing assistant attorney general to Judge - such an inspiration! A Judge with a successful sobriety court that focuses on rehabilitation of repeat offense substance abusers. I will work to have a drug specialty court in Lansing District Court to provide a...



See Ad Performance

- ☒ Inactive
 Aug 20, 2018 - Aug 27, 2018

Paid for by The Committee to Elect Ayanna Neal Judge

Ayanna Neal for 54-A District Court Judge
 Sponsored • Paid for by The Committee to Elect Ayanna Neal Judge

As a practicing attorney for over 16 years, over 14 years as an Assistant Prosecutor, I have continuously worked in the courts. I've handled thousands of cases from misdemeanors to capital offenses and worked in all of the courts in Ingham County- family, district and circuit. The work has not been

- ☒ Inactive
 Aug 18, 2018 - Aug 20, 2018

Paid for by The Committee to Elect Ayanna Neal Judge

Ayanna Neal for 54-A District Court Judge
 Sponsored • Paid for by The Committee to Elect Ayanna Neal Judge

As a practicing attorney for over 16 years, over 14 years as an Assistant Prosecutor, I have continuously worked in the courts. I've handled thousands of cases from misdemeanors to capital offenses and worked in all of the courts in Ingham County- family, district and circuit. The work has not been

- ☒ Inactive
 Aug 15, 2018 - Aug 18, 2018

Paid for by The Committee to Elect Ayanna Neal Judge

Ayanna Neal for 54-A District Court Judge
 Sponsored • Paid for by The Committee to Elect Ayanna Neal Judge

Thank you Justice Wilder for your support! I am honored. #COURTROOMEXPERIENCE #INTEGRITY #COMPASSION #JUSTICE

VISUAL AND AUDIO. THE WORK HAS NOT BEEN...

VISUAL AND AUDIO. THE WORK HAS NOT BEEN...

Filter results by

Country

All
Brazil
United Kin
U.S.

ease and quiet. Only through
experience of trial and suffering can
the soul be strengthened, ambition
inspired, and success achieved.

Helen Keller



ease and quiet. Only through
experience of trial and suffering can
the soul be strengthened, ambition
inspired, and success achieved.

Helen Keller



AYANNA NEAL ENDORSED BY
MICHIGAN SUPREME COURT
JUSTICE KURTIS WILDER
EXPERIENCE MATTERS

Type of Ad

Political and Issue
News

See Ad Performance

See Ad Performance

See Ad Performance

Ad Status

☒ Inactive

Aug 15, 2018 - Aug 18, 2018

☒ Inactive

Aug 15, 2018 - Aug 20, 2018

☒ Inactive

Aug 14, 2018 - Aug 17, 2018

All

Active Ads Paid for by The Committee to Elect Ayanna Neal Judge

Inactive Ads

Paid for by The Committee to Elect Ayanna Neal Judge

Paid for by The Committee to Elect Ayanna Neal Judge

Pages

All



Ayanna Neal for 54-A District Court Judge
Sponsored • Paid for by The Committee to Elect Ayanna Neal Judge



Ayanna Neal for 54-A District Court Judge
Sponsored • Paid for by The Committee to Elect Ayanna Neal Judge



Ayanna Neal for 54-A District Court Judge
Sponsored • Paid for by The Committee to Elect Ayanna Neal Judge

Choose a Page... red to have the support and endorsement of defense attorney and the longest serving Eaton County Commissioner, Joseph C. Brehler. Mr. Brehler has served as an Eaton County Commissioner since 1985 for the City of Lansing Southside neighborhood I was born and raised in....

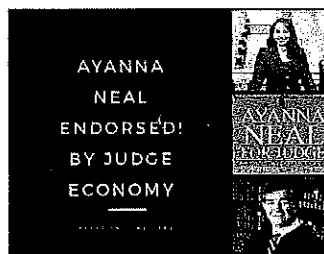
I am honored to have the support and endorsement of Ingham County 30th Circuit Court Judge George Economy who has served on the Ingham County Probate Court for over 30 years. #EXPERIENCEMATTERS

I am honored to have the support and endorsement of Ingham County 30th Circuit Court Judge George Economy who has served on the Ingham County Probate Court for over 30 years. #EXPERIENCEMATTERS

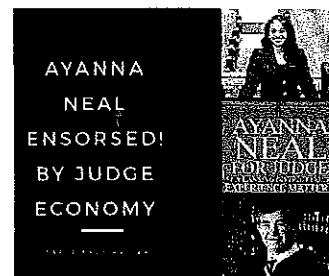


Ayanna Neal for 54-A District Court Judge

Send Mess...



See Ad Performance



See Ad Performance

See Ad Performance

☒ Inactive

Aug 12, 2018 - Aug 15, 2018

Paid for by The Committee to Elect Ayanna Neal Judge



Ayanna Neal for 54-A District Court Judge
Sponsored • Paid for by The Committee to Elect Ayanna Neal Judge

I am honored to have the support and endorsement of Ingham County 30th Circuit Judge Laura Baird. She was one of the first judges I practiced in front of as an Assistant Prosecutor almost 15 years ago. "Ayanna has the background, experience and temperament to serve with honor as a Distr...



☒ Inactive

Aug 9, 2018 - Aug 14, 2018

Paid for by The Committee to Elect Ayanna Neal Judge



Ayanna Neal for 54-A District Court Judge
Sponsored • Paid for by The Committee to Elect Ayanna Neal Judge

16 year Attorney; 14 year Assistant Prosecutor. EXPERIENCE MATTERS.

18

Ad Performance



Ayanna Neal for 54-A District Court Judge

Sponsored • Paid for by The Committee to Elect Ayanna Neal Judge

A huge thank you to Price Dobernack and the Plumbers & Pipefitters Local No. 333 in Lansing for endorsing me and my campaign for judge. Thank you for your support and all the work you all do in our community to improve the lives of others! #COMMUNITY1ST #EXPERIENCEMATTERS #LANSINGNATIVE #VOTEAYANNA11618

Ayanna Neal
ENDORSED BY

PLUMBERS & PIPEFITTERS

LOCAL NO. 333

LANSING, MI



Ayanna Neal for 54-A District Court Judge

View more ads from this Page

Paid for by The Committee to Elect Ayanna Neal Judge

When an advertiser categorizes their ad as being related to politics or issues of national importance, they are required to disclose who paid for the ad. Learn more

See additional disclaimer information

Ad Performance

● Inactive

Jul 14, 2018 - Jul 17, 2018

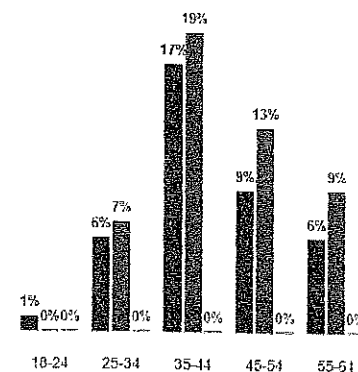
1K - 5K
Impressions

<\$100
Money spent (US)

Audience Breakdown

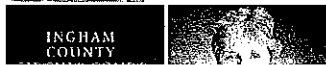
Age and Gender

Men Women Unknown



Location

Michigan



Filter results by

Country

All

Brazil

Inactive

United Kingdom 29, 2018 - Aug 5, 2018

U.S.

Paid for by The Committee to Elect Ayanna Neal Judge

Type of Ad

Political and Issue Ayanna Neal for 54-A District Court

News



Judge

Sponsored • Paid for by The Committee to Elect Ayanna Neal Judge

Ad Status

All

Active Ads

SIGNS UP FOR EXPERIENCE! Send a message now and provide your name and address to receive a yard sign this fall! Thank you in advance for your support!

Inactive Ads

EXPERIENCEMATTERS

Pages

All

Choose a Page...



Ayanna Neal for 54-A District Court Judge

Send Mess...

See Ad Performance

Ads launched in July 2018

14

Inactive

Jul 19, 2018 - Jul 22, 2018

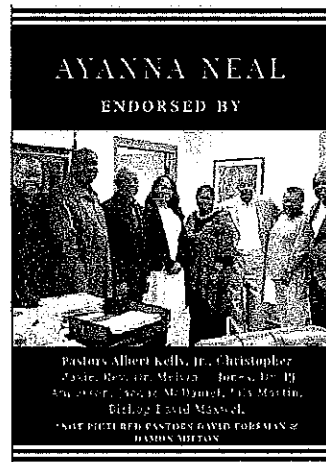
Paid for by The Committee to Elect Ayanna Neal Judge



Ayanna Neal for 54-A District Court Judge

Sponsored • Paid for by The Committee to Elect Ayanna Neal Judge

Thank you so much to the pastors to date who not only support and endorse me but most importantly pray for me! Thank you for your spiritual leadership and community outreach to help not only church members but community members! #Divineconnections #myfootstepsordered #2Tim215



See Ad Performance

See More



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

October 24, 2018

The Committee to Elect Ayanna Neal Judge
c/o Ayanna Neal
PO Box 16215
Lansing, Michigan 48901

Dear Ms. Neal:

The Department of State (Department) received a formal complaint filed by Jennifer Hatton against you alleging that you have violated the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.201 *et seq.* 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.* A copy of the complaint and supporting documentation is enclosed with this letter.

The MCFA and corresponding administrative rules require a person who produces printed material that relates to an election to 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).

Ms. Hatton alleges that the committee has purchased ads on Facebook which do not disclose the full address of the committee. A list of the advertisements and screenshots from Facebook were provided with the complaint.

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.

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. All materials must be sent 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 Ms. Hatton, who will have an opportunity to submit a rebuttal statement to the Department. After reviewing all of 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 criminal penalty provided in section 47(6) of the Act.

If you have any questions concerning this matter, you may contact me at (517) 373-2540.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam Fracassi". The signature is fluid and cursive, with the first name "Adam" and last name "Fracassi" clearly distinguishable.

Adam Fracassi
Bureau of Elections
Michigan Department of State

c: Jennifer Hatton

STATE OF MICHIGAN
DEPARTMENT OF STATE

RECEIVED/FILED
MICHIGAN DEPT OF STATE
NOV 07 -7 PM 4:59
GREAT SEAL

November 3, 2018

The Committee to Elect Ayanna Neal Judge
P.O. Box 16215
Lansing, MI 48901

State of Michigan,
Ruth Johnson, Secretary of State
Department of State
Bureau of Elections
Richard H. Austin Building 1st Floor
430 W. Allegan
Lansing, MI 48918

RE: Campaign Finance Complaint filed by Jennifer K. Hatton 1608 Alpha St. Lansing, MI 48910 (517) 410 8568 (Dated 10/18/2018)

Dear Mr. Fracassi,

The Committee to Elect Ayanna Neal Judge is in receipt of the complaint filed by Jennifer Hatton and in response DENY that the Committee is in violation or violated the Michigan Campaign Finance Act by failing to list the full candidate identification information on Facebook advertisements pursuant to MCL 169.247.

MCL 169.247 provides "(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.”

The Committee to Elect Ayanna Neal Judge has a committee page on Facebook, “Ayanna Neal for Lansing Judge” (@ayannanealforlansingjudge; <https://www.facebook.com/pg/ayannanealforlansingjudge/posts/>). The Committee Facebook page contains the Committee name and address. (See Exhibit 1) When the Facebook was set up, the Committee information and address was provided to Facebook (Exhibit 2).

Additionally, each post that is posted on the Committee page is on the homepage which contains the Committee address. (Exhibit 3)

The Committee has posted multiple posts that have been “boosted,” or paid for as advertisements that can be seen by people on Facebook. Besides the information that is contained in the post, the post also contains the advertiser, The Committee to Elect Ayanna Neal Judge. The boosted posts also contains(ed) the Committee address not only on the Ayanna Neal for Lansing Judge page that it was posted on but also on the top of the post (Facebook contains a hyperlink that shows the advertiser’s name and address by putting the cursor over the advertiser’s name. (Facebook doesn’t show the entire address of the advertiser but does show part of the advertiser’s address (it appears that way because of the small area available) and it also contains the letter “i” at the top of the post which can be clicked on and has a window that pops up that says, “About this Ad,” and says who paid for the advertisement and has another link that says, “See information about this ad>” that can be clicked on and provides pertinent information about who paid for the advertisement/boosted post. (Exhibit 4)

Regarding the “boosted” posts that are alleged to have not contained the full identification statement of the Committee to Elect Ayanna Neal Judge as required by the Michigan Campaign Finance Act, the Committee states the following:

1. As to the ad/boosted post, “Bring me a yard sign,” from October 15, 2018, the Committee address is listed on the page in which the ad/boosted post was on and the full identification statement of the Committee is listed if one hovers over the top of the post where the Committee name is listed. The full identification statement of the Committee is also listed in the “i” or informational tab as delineated by Facebook. (Exhibit 5)
2. As to the ad/boosted post regarding the endorsement of the Greater Lansing Labor Council,” from October 12, 2018, the Committee address is listed on the page in which the ad/boosted post was on and the full identification statement of the Committee is listed if one hovers over the top of the post where the Committee name is listed. The full identification statement of the

Committee is also listed in the “i” or informational tab as delineated by Facebook. (Exhibit 6)

3. As to the ad/boosted post regarding the endorsement of the WLAM from October 12, 2018, the Committee address is listed on the page in which the ad/boosted post was on and the full identification statement of the Committee is listed if one hovers over the top of the post where the Committee name is listed. The full identification statement of the Committee is also listed in the “i” or informational tab as delineated by Facebook.
4. As to the ad/boosted post regarding the endorsement of the IBEW Local 665 from October 12, 2018, the Committee address is listed on the page in which the ad/boosted post was on and the full identification statement of the Committee is listed if one hovers over the top of the post where the Committee name is listed. The full identification statement of the Committee is also listed in the “i” or informational tab as delineated by Facebook.
5. As to the ad/boosted post regarding the endorsement of Judge O’Neil, the Committee address is listed on the page in which the ad/boosted post was on and the full identification statement of the Committee is listed if one hovers over the top of the post where the Committee name is listed. The full identification statement of the Committee is also listed in the “i” or informational tab as delineated by Facebook.
6. As to the ad/boosted post regarding the endorsement of Judge Giddings, the Committee address is listed on the page in which the ad/boosted post was on and the full identification statement of the Committee is listed if one hovers over the top of the post where the Committee name is listed. The full identification statement of the Committee is also listed in the “i” or informational tab as delineated by Facebook.
7. As to the ad/boosted post regarding the endorsement of the Judge Lillard the Committee address is listed on the page in which the ad/boosted post was on and the full identification statement of the Committee is listed if one hovers over the top of the post where the Committee name is listed. The full identification statement of the Committee is also listed in the “i” or informational tab as delineated by Facebook.
8. As to the ad/boosted post regarding the endorsement of Judge Canady, the Committee address is listed on the page in which the ad/boosted post was on and the full identification statement of the Committee is listed if one hovers over the top of the post where the Committee name is listed. The full identification statement of the Committee is also listed in the “i” or informational tab as delineated by Facebook.
9. As to the ad/boosted post regarding the endorsement of the Ingham Democratic Party, the Committee address is listed on the page in which the

ad/boosted post was on and the full identification statement of the Committee is listed if one hovers over the top of the post where the Committee name is listed. The full identification statement of the Committee is also listed in the “i” or informational tab as delineated by Facebook.

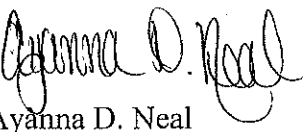
10. As to the ad/boosted post regarding the picture with Gretchen Whitmer, the Committee address is listed on the page in which the ad/boosted post was on and the full identification statement of the Committee is listed if one hovers over the top of the post where the Committee name is listed. The full identification statement of the Committee is also listed in the “i” or informational tab as delineated by Facebook.
11. As to the ad/boosted post regarding the endorsement of Judge Allen, the Committee address is listed on the page in which the ad/boosted post was on and the full identification statement of the Committee is listed if one hovers over the top of the post where the Committee name is listed. The full identification statement of the Committee is also listed in the “i” or informational tab as delineated by Facebook.
12. As to the ad/boosted post regarding the Helen Keller quote, the Committee address is listed on the page in which the ad/boosted post was on and the full identification statement of the Committee is listed if one hovers over the top of the post where the Committee name is listed. The full identification statement of the Committee is also listed in the “i” or informational tab as delineated by Facebook.
13. As to the ad/boosted post regarding the endorsement of Justice Wilder, the Committee address is listed on the page in which the ad/boosted post was on and the full identification statement of the Committee is listed if one hovers over the top of the post where the Committee name is listed. The full identification statement of the Committee is also listed in the “i” or informational tab as delineated by Facebook.
14. As to the ad/boosted post regarding the endorsement of Eaton County Commission, Joseph Brehler, the Committee address is listed on the page in which the ad/boosted post was on and the full identification statement of the Committee is listed if one hovers over the top of the post where the Committee name is listed. The full identification statement of the Committee is also listed in the “i” or informational tab as delineated by Facebook.
(Exhibit 7)
15. As to the ad/boosted post regarding the endorsement of Judge Economy, the Committee address is listed on the page in which the ad/boosted post was on and the full identification statement of the Committee is listed if one hovers over the top of the post where the Committee name is listed. The full

identification statement of the Committee is also listed in the “i” or informational tab as delineated by Facebook.

16. As to the ad/boosted post regarding the endorsement of Judge Baird the Committee address is listed on the page in which the ad/boosted post was on and the full identification statement of the Committee is listed if one hovers over the top of the post where the Committee name is listed. The full identification statement of the Committee is also listed in the “i” or informational tab as delineated by Facebook.
17. As to the ad/boosted post regarding the endorsement of Judge Jamo the Committee address is listed on the page in which the ad/boosted post was on and the full identification statement of the Committee is listed if one hovers over the top of the post where the Committee name is listed. The full identification statement of the Committee is also listed in the “i” or informational tab as delineated by Facebook.
18. As to the ad/boosted post regarding the endorsement of the Plumbers and Pipefitters, the Committee address is listed on the page in which the ad/boosted post was on and the full identification statement of the Committee is listed if one hovers over the top of the post where the Committee name is listed. The full identification statement of the Committee is also listed in the “i” or informational tab as delineated by Facebook.
19. As to the ad/boosted post regarding the endorsement of the local clergy the Committee address is listed on the page in which the ad/boosted post was on and the full identification statement of the Committee is listed if one hovers over the top of the post where the Committee name is listed. The full identification statement of the Committee is also listed in the “i” or informational tab as delineated by Facebook.

The advertisements that were paid for by the Committee to Elect Ayanna Neal Judge were in compliance with the Michigan Campaign Finance Laws. There were multiple times in which Facebook didn't display the entire address but that appears to be because of spacing limitations, somewhat akin to space on a button or a balloon as described in MCL 169.247 (3).

Respectfully submitted,



Ayanna D. Neal

Cc: File



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

November 9, 2018

Jennifer Hatton
1608 Alpha Street
Lansing, Michigan 48910

Dear Ms. Hatton:

The Department of State received a response to the complaint you filed against Ayanna Neal, 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,

A handwritten signature in black ink, appearing to read "Adam Fracassi".

Adam Fracassi
Bureau of Elections
Michigan Department of State

c: Ayanna Neal



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

April 23, 2019

Jennifer Hatton
1608 Alpha Street
Lansing, Michigan 48910

Dear Ms. Hatton:


The Department of State has concluded its investigation into the complaint you filed against the Committee to Elect Ayanna Neal Judge, which alleged violations of the Michigan Campaign Finance Act (MCFA or Act), 1976 P.A. 388, MCL 169.201 *et seq.* This letter concerns the resolution of your complaint.

You filed the complaint with the Department on October 18, 2018 and alleged that Ms. Neal ran Facebook advertisements in advance of the 2018 November General Election that expressly advocated for her election. You allege that these advertisements failed to contain a proper paid for by statement as required by section 47 of the MCFA and Administrative Rule 169.36. As evidence, the complaint provided screenshots of the ads, some of which appear below:

● Inactive
Oct 16, 2018 - Oct 26, 2018

Published by The Committee to Elect Ayanna Neal Judge

Ayanna Neal for Lansing Judge
Sponsored - Published by The Committee to Elect Ayanna Neal Judge




See Ad Performance

● Inactive
Oct 15, 2018 - Oct 22, 2018

Published by The Committee to Elect Ayanna Neal Judge

Ayanna Neal for Lansing Judge
Sponsored - Published by The Committee to Elect Ayanna Neal Judge

Show your support of Ayanna Neal for 54-A Lansing District Judge by displaying a yard sign! Please send a message with your name and address and we'll bring you a yard sign! #supportLansingdown #homegrown #ExperienceMatters



WED, OCT 17, 2018 - SAT, OCT 27, 2018
Please bring me a Yard sign!
Lansing, Michigan
Please bring me a Yard sign!

View Event


See Ad Performance

● Inactive
Oct 12, 2018 - Oct 18, 2018

Published by The Committee to Elect Ayanna Neal Judge

Ayanna Neal for Lansing Judge
Sponsored - Published by The Committee to Elect Ayanna Neal Judge

Thank you President Paul Hufnagel and the Greater Lansing Labor Council for your endorsement and support! #supportlabor #loveLansing



Ayanna Neal for Lansing Judge

See Ad Performance

Via letter dated November 3, 2018, Ms. Neal responded and indicated that her committee paid for advertisements and attempted to comply with the rules to the best of her ability. Specifically, Ms. Neal indicated that Facebook does not show the entire address of the advertiser due to character limitations. The information is available however by clicking on the "i" that is located

next to each advertisement. The full address information was also available by going to the homepage of "Ayanna Neal for Lansing Judge." No rebuttal was filed.

During the investigation, the Department spoke with Ms. Neal via phone who described the process of "boosting" Facebook advertisements. According to Ms. Neal, the first step in the process is for the candidate to create a Facebook page that markets the candidate. Here, Ms. Neal created the page "the Committee to Election Ayanna Neal Judge." Importantly, this page is subjected to a character limit.

As the administrator, Ms. Neal chose to market her page through paid advertisements, what Facebook terms as "boosting." The ads that appear to certain voters based upon the advertising settings. Upon "boosting" your page, Facebook automatically populates its own paid for by statement based upon the name of the candidate's page¹:

**Paid for by The Committee to Elect Ayanna
Neal Judge**



**Ayanna Neal for 54-A District Court
Judge
Sponsored • Paid for by The Committee to
Elect Ayanna Neal Judge**

During the conversation, Ms. Neal also indicated the impossibility of complying with the Department's administrative rules as the Facebook advertisement page contained character limitations. Ms. Neal indicated that her homepage always contained the full address of her committee, and that this was available to voters on every advertisement by clicking on the link to her homepage.

Section 47 of the MCFA states that all 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. MCL 169.247(1). The Department has interpreted this section via administrative rule to require that "[a]ny other medium used for campaign purposes shall clearly and unequivocally include the identification or disclaimer, or both, provided in section 47 of the act." R. 169.36(1). The identification is required to include the words "Paid for by" followed by the full name of the person or committee paying for the material and the person's or committee's street number or post office box, city or town, state, and zip code." R. 169.36(2) (emphasis added). 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).

¹ The Department has reviewed other Facebook advertisements from candidates who ran in the November 2018 General Election. Based on that review, it appears that multiple candidates and political groups are not able to comply with Rule 169.36 as they all fail to contain a full address.

Upon review, it appears that the advertisements contain an incomplete paid for by statement as they all omit the committee's physical address. However, the Department takes Ms. Neal at her word that all efforts to comply with the Department's rules were made but given the age of the rule promulgated in 1982 and technological advances in political campaigns, the rule has become difficult – if not impossible – to comply with. The Department also takes Ms. Neal at her word that the committee's full address remained on the committee's homepage and was readily and easily accessible to voters at all times.

Based off of Ms. Neal's statements, and in the absence of evidence to the contrary, the Department concludes that Ms. Neal made every attempt to comply with the disclosure requirements, and since voters were able to obtain the committee's full address by only clicking one time, the Department finds this sufficient compliance with section 47.

With this in mind, the Department dismisses the complaint and will consider options to better accommodate technological advances in campaigns.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam Fracassi". The signature is fluid and cursive, with the first name "Adam" and last name "Fracassi" clearly distinguishable.

Adam Fracassi
Bureau of Elections
Michigan Department of State

c: Ayanna Neal