

Campaign Finance Complaint Form Michigan Department of State

This complaint form may be used to file a complaint alleging that someone violated the
(the MCFA, 1976 PA 388, as amended; MCL 169.201 *et seq.*).

All information on the form must be provided along with an original signature and evidence.

Please print or type all information.

I allege that the MCFA was violated as follows:

Section 1. Complainant		
Your Name <i>Stephen Rajcar</i>	Daytime Telephone Number <i>269-535-1001</i>	
Mailing Address <i>1109 W Franklin St</i>		
City <i>Jackson</i>	State <i>MI</i>	Zip <i>49203</i>

Section 2. Alleged Violator		
Name <i>Robert Genetski</i>		
Mailing Address <i>PO Box 475</i>		
City <i>Saugetuck</i>	State <i>MI</i>	Zip <i>49453</i>

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

Section(s) of the MCFA violated:

Act 388 of 1976/169.201, 169.233, 169.217, spirit of Michigan Campaign Finance Act, also promulgated by the Secretary of State.

Explain how those sections were violated:

<i>Explanation attached.</i>	RECEIVED MICHIGAN DEPT OF STATE 2014-01-22 PM 3:06 ELECTRONIC/CREAT LICAL

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

<i>Evidence attached.</i>

Section 4. Certification (Required)

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

X

Signature of Complainant

Date

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

Section 15(8) 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

Bob Genetski is the Chief Election Official of Allegan county yet he fails to comply himself with the laws and rules that Mr. Genetski is tasked with implementing and maintaining in his county. Please find below and attached an explanation of Michigan Campaign Finance violations committed by Bob Genetski.

Campaign violations:

1) Disclaimer violation. 169.247 requires any printed material to identify the name and address of who has paid for it. This is a most basic requirement and certainly something a former State Representative and present Chief Election Official should know. Mr. Genetski placed a print advertisement in the Allegan News (8/1/18) that contained no disclaimer. Based on Mr. Genetski's current position as Allegan County's Chief Election Official he clearly knowingly and intentionally violated the law. See Attachment A for a copy of the print ad.

2) Unreported expenditures. Mr. Genetski fails to report numerous expenditures and/or debts that occurred on or before July 22, 2018.

a) Signs supporting Mr. Genetski's campaign began appearing in the district in late June and early July. Attachment B shows a 4'x4' corrugated vinyl sign photographed on June 24th. The attachment also shows a screenshot of Facebook post of Mr. Genetski's promoting the availability of standard size yard signs. Mr. Genetski's 2018 Pre-Primary filing does not list an expenditure for yard signs.

b) Mr. Genetski has run several Facebook advertisements on the social media platform. However, in his 2018 Pre-Primary filing he only reports two expenditures in the amounts of \$62.08 (5/31/18) and \$78.73 (4/2/18). Again, Mr. Genetski is failing to fully account for his expenditures. As you will see, information available from Facebook shows that between June 7th and July 20th, 2018 Mr. Genetski ran eight advertisements (Attachment C). Using the ranges provided by Facebook Mr. Genetski failed to report between \$305 - \$1,992 in expenditures for advertising he received prior to the end of the reporting period.

c) Attachments D, E, F, and G show mailings delivered to homes around June 29, July 5, July 7, and July 18 respectively. Mr. Genetski's 2018 Pre-Primary filing lists a few low dollar amount purchases of brochures, envelopes, door hangers, stamps, parade banner, and magnets. There is not one expenditure reported that corresponds to the production, printing, and postage cost of these four mailings. Yet again, Mr. Genetski is failing to fully account for his expenditures.

d) Mr. Genetski has advertised extensively on the radio. His 2018 Pre-Primary filing fails to account as an expenditure or debt two agreements he signed on July 9, 2018. WOOD-AM in the amount of \$8,145.00 (Attachment H) and WKZO-AM in the amount of \$2,094 (Attachment I). These agreements for advertisement are entirely unreported in Mr. Genetski's filing even though MCL 169.206 states expenditures include the "promise of payment of money..."

3) Improperly reported reimbursements. Mr. Genetski's 2018 Pre-Primary filing reports three expenditures from his campaign to himself for a total of \$30,514.64 (Attachment J). Beyond "reimbursements" there is no itemized accounting for the expenditures. This neither complies with nor follows the spirit of the law and/or Secretary of State rules for campaign finance reporting and transparency.

Mr. Genetski's lack of compliance with the Michigan Campaign Finance Act is alarming. He is no stranger to elections as a former State Representative and previous candidate for State Senator. He is also no stranger to the law as a the Chief Elections Official of Allegan county. Mr. Genetski is the candidate, and the listed treasurer of his campaign, so the lack of transparency, accountability, and adherence to law fall squarely in his lap. No one should be above the law, especially not someone with the past experience and current position of Mr. Genetski.

169.206 "Expenditure" defined.

Sec. 6.

(1) "Expenditure" means a payment, donation, loan, or promise of payment of money or anything of ascertainable monetary value for goods, materials, services, or facilities in assistance of, or in opposition to, the nomination or election of a candidate, the qualification, passage, or defeat of a ballot question, or the qualification of a new political party. Expenditure includes, but is not limited to, any of the following:

169.233 Campaign statements; filing schedule; report on expenditures; form; late filing fee; violation as misdemeanor; penalty; prohibitions; filing incomplete or inaccurate statement or report; civil fine; failure to file campaign statements; violation as felony; seizure and forfeiture of money; inventory statement of money seized; notice; hearing; decision; appeal; commencement of action.

Sec. 33.

(1) A committee, other than an independent committee, an independent expenditure committee, or a political committee required to file with the secretary of state, supporting or opposing a candidate shall file complete campaign statements as required by this act and the rules promulgated under this act according to the following schedule:

(10) If a candidate, treasurer, or other individual designated as responsible for a committee's record keeping, report preparation, or report filing knowingly files an incomplete or inaccurate statement or report required by this section, that individual is subject to a civil fine of not more than \$1,000.00.

(11) If a candidate, treasurer, or other individual designated as responsible for a committee's record keeping, report preparation, or report filing knowingly omits or underreports individual contributions or individual expenditures required to be disclosed by this act, that individual is subject to a civil fine of not more than \$1,000.00 or the amount of the contributions and expenditures omitted or underreported, whichever is greater.

169.247 Printed matter or radio or television paid advertisement having reference to election, candidate, or ballot question; name and address; identification or disclaimer; size and placement; rules; exemption; statement that payment made "with regulated funds"; communication exempted under section 6(2)(j); violation as misdemeanor; penalty; prerecorded telephone message.

Sec. 47.

(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.

Attachment A

STANLEY, WILLIAM
The People's Representative

ALLEGAN COUNTY PROSECUTOR
and ex-candidate to the People of Allegan County

NOTICE TO THE ALLEGAN COUNTY PROSECUTOR & PEOPLE OF ALLEGAN COUNTY
and ex-candidate to the People of Allegan County

Bob Genetski, the ONLY Proven Conservative

Bob Genetski: Proven Conservative for State Senate

- ✓ Actual voting record scored #1 MOST CONSERVATIVE of all 110 legislators a record 4 times!
- ✓ signed & opposed his taxpayer protection pledge & opposed the gas tax & car registration fee increase
- ✓ opposed Hollywood Film Tax credit giveaway
- ✓ Opposed giving Big Energy a monopoly in MI, because you deserve lower energy bills
- ✓ NOT a lobbyist's favorite, never on the Lansing Free Lunch List!
- ✓ After leaving Lansing -- Bob Genetski's records for customer service as Allegan County Clerk
- ✓ Endorsed by conservatives: Steve Johnson, Tony Molo, Tom Hocker, Dave Agema, Fulton Sheen, & Jack Haggendyk

Anti-Neshita Lobbyist Favorite

- ✓ Young record never scored more conservative
- ✓ signed, but BROKE his taxpayer protection pledge by voting for higher gas taxes & car registration fees
- ✓ voted to give Hollywood \$50M in film tax credits
- ✓ Sponsored the bill to give Big Energy a monopoly in MI, raising your energy bills.
- ✓ Top 5 most lobbyist's paid meals while in the State House, with over \$15,000 in food purchased for lunch
- ✓ Never left Lansing -- appointed Michigan Lottery Commissioner where he expended online gambling & was paid \$445,000 per year!
- ✓ Endorsed by over \$100,000 in lobbyist money funding his campaign

JOIN US AND DRINK THE LANSING SWAMP!

Vote for Bob Genetski, the ONLY Proven Conservative



Allegan County Clerk Bob Genetski

Allegan County Clerk Bob Genetski

Above: Corrugated Vinyl 4'x4' Yard Sign Photo taken June 24, 2018

Allegan County Clerk Bob Genetski

Allegan County Clerk Bob Genetski

On Foot, by Segway or even by Little Pink
Corvette...the Genetski Sign Crew is ready to deliver
to you!

+ Make sure you watch the cute video the girls did
with the pound one! +

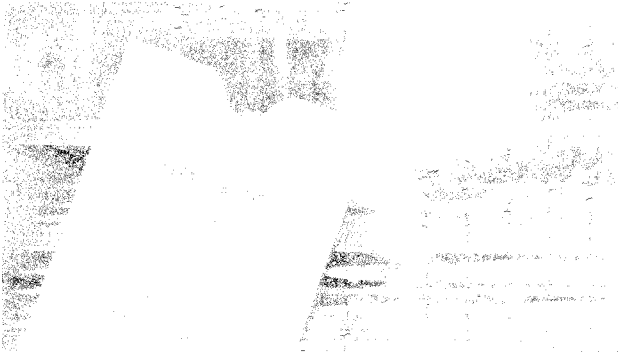
...



Attachment C
1/17



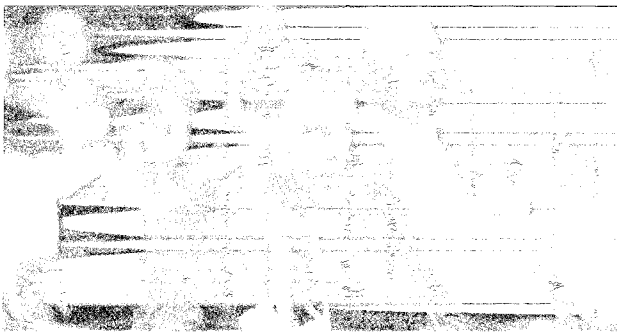
During this time, the State Board of Education is working on the following items:



Being prepared to meet the needs of the State Board of Education.



During this time, the State Board of Education is working on the following items:



Being prepared to meet the needs of the State Board of Education.



During this time, the State Board of Education is working on the following items:

Being prepared to meet the needs of the State Board of Education.

Being prepared to meet the needs of the State Board of Education.



Being prepared to meet the needs of the State Board of Education.

Being prepared to meet the needs of the State Board of Education.

Being prepared to meet the needs of the State Board of Education.

Being prepared to meet the needs of the State Board of Education.



During this time, the State Board of Education is working on the following items:

Being prepared to meet the needs of the State Board of Education.

Being prepared to meet the needs of the State Board of Education.



Being prepared to meet the needs of the State Board of Education.

Being prepared to meet the needs of the State Board of Education.

Being prepared to meet the needs of the State Board of Education.

Being prepared to meet the needs of the State Board of Education.



... ..
... ..
... ..



... ..
... ..

... ..
... ..
... ..



... ..

... ..
... ..

... ..



... ..
... ..

... ..
... ..

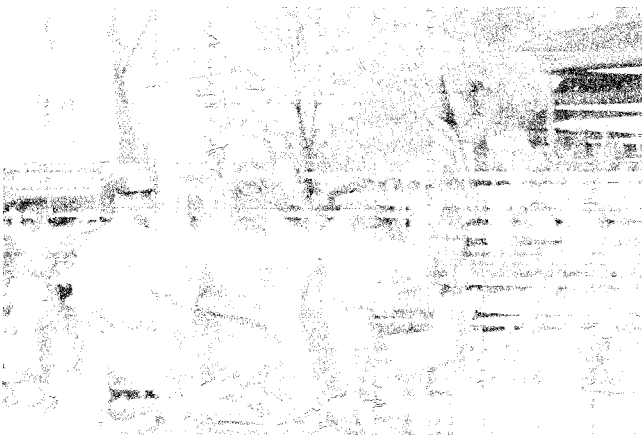
... ..

... ..



... ..
... ..

... ..
... ..



... ..

... ..
... ..

... ..



... ..
... ..

... ..
... ..

... ..

... ..

Attachment C

Table 1. *Continued*

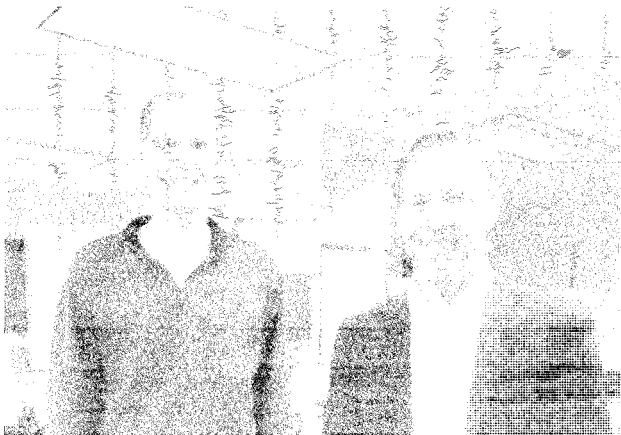
[illegible][illegible][illegible][illegible]

Figure 1. The effect of the concentration of the *Agaricus bisporus* spores on the growth of *Agaricus bisporus* and *Agaricus bisporus* spores. The concentration of the spores was 10⁶ spores/ml (A), 10⁷ spores/ml (B), 10⁸ spores/ml (C), 10⁹ spores/ml (D), 10¹⁰ spores/ml (E), 10¹¹ spores/ml (F), 10¹² spores/ml (G), 10¹³ spores/ml (H), 10¹⁴ spores/ml (I), 10¹⁵ spores/ml (J), 10¹⁶ spores/ml (K), 10¹⁷ spores/ml (L), 10¹⁸ spores/ml (M), 10¹⁹ spores/ml (N), 10²⁰ spores/ml (O), 10²¹ spores/ml (P), 10²² spores/ml (Q), 10²³ spores/ml (R), 10²⁴ spores/ml (S), 10²⁵ spores/ml (T), 10²⁶ spores/ml (U), 10²⁷ spores/ml (V), 10²⁸ spores/ml (W), 10²⁹ spores/ml (X), 10³⁰ spores/ml (Y), 10³¹ spores/ml (Z).

© 2004 Blackwell Publishing Ltd
Journal of Internal Medicine 255: 105–112

[illegible][illegible][illegible]

Figure 1. The effect of the number of trials on the number of correct responses. The number of correct responses was significantly higher than the number of incorrect responses in all cases. The number of correct responses was significantly higher than the number of incorrect responses in all cases. The number of correct responses was significantly higher than the number of incorrect responses in all cases.



1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619, 2620, 2621, 2622, 2623, 2624, 2625, 2626, 2627, 2628, 2629, 2630, 2631, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2640, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2648, 2649, 2650, 2651, 2652, 2653, 2654, 2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662, 2663, 2664, 2665, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 26

Figure 1 is a schematic representation of the experimental design. It shows a sequence of steps: 1. A subject is shown in a box labeled 'Subject'. 2. An arrow points to a box labeled 'Stimulus presentation'. 3. An arrow points to a box labeled 'Response'. 4. An arrow points to a box labeled 'Feedback'. 5. An arrow points to a box labeled 'Next trial'. The sequence is enclosed in a larger box labeled 'Trial'.

Figure 1. The effect of the concentration of the *Agrobacterium* suspension on the transformation efficiency of *Agrobacterium* strains. The concentration of the *Agrobacterium* suspension was 10⁶ cells/ml (A), 10⁷ cells/ml (B), 10⁸ cells/ml (C), and 10⁹ cells/ml (D). The concentration of the *Agrobacterium* suspension was 10⁶ cells/ml (A), 10⁷ cells/ml (B), 10⁸ cells/ml (C), and 10⁹ cells/ml (D). The concentration of the *Agrobacterium* suspension was 10⁶ cells/ml (A), 10⁷ cells/ml (B), 10⁸ cells/ml (C), and 10⁹ cells/ml (D).

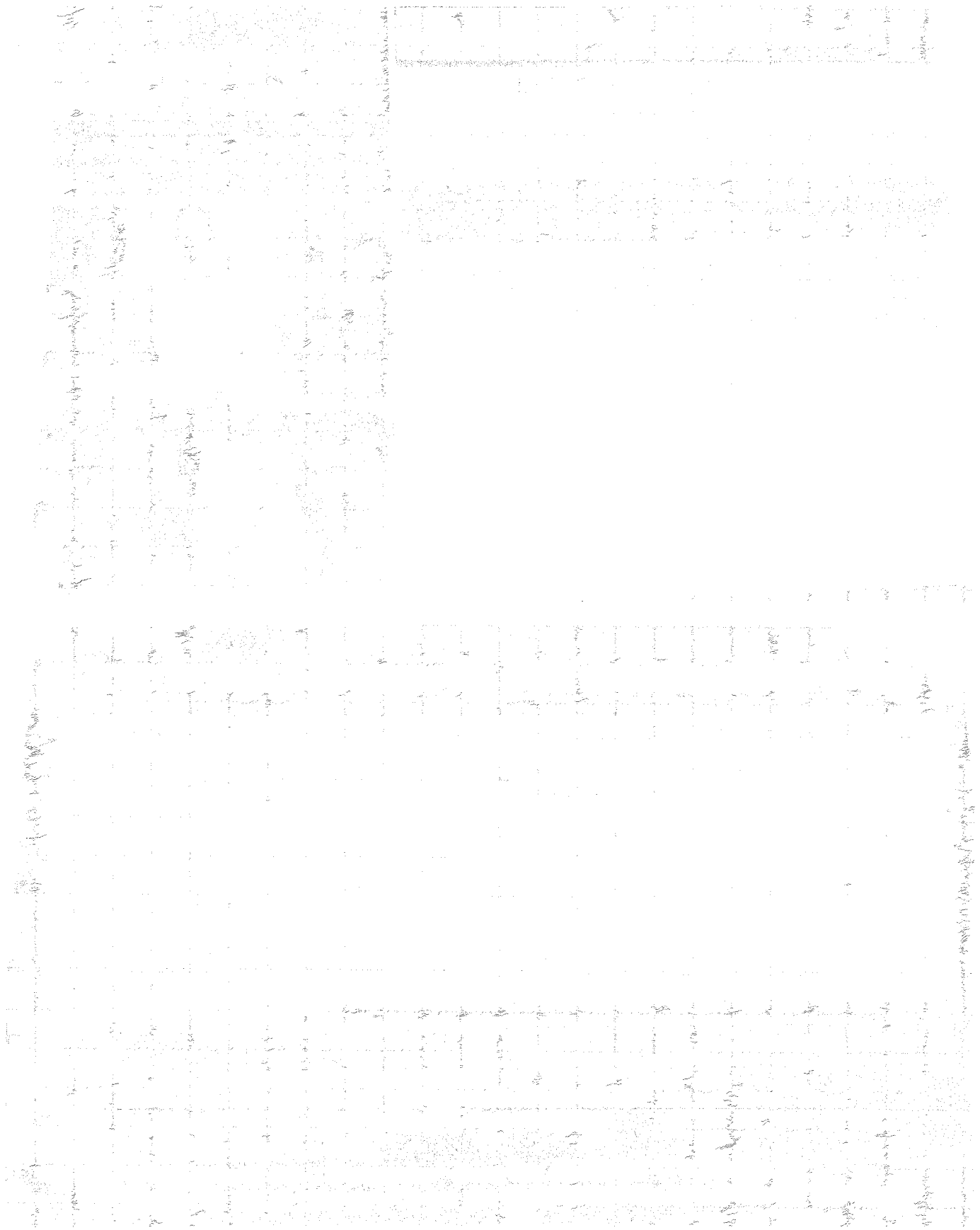
Figure 1. Schematic representation of the experimental design. The subjects were divided into two groups: the control group (CG) and the experimental group (EG). The CG was divided into two subgroups: the control group (CG) and the control group (CG). The EG was divided into two subgroups: the experimental group (EG) and the experimental group (EG). The subjects were divided into two groups: the control group (CG) and the experimental group (EG). The CG was divided into two subgroups: the control group (CG) and the control group (CG). The EG was divided into two subgroups: the experimental group (EG) and the experimental group (EG).

Year	1990		1991		1992		1993		1994		1995		1996		1997		1998		1999		2000		2001		2002		2003		2004		2005		2006		2007		2008		2009		2010		2011		2012		2013		2014		2015		2016		2017		2018		2019		2020		2021		2022		2023		2024		2025		2026		2027		2028		2029		2030		2031		2032		2033		2034		2035		2036		2037		2038		2039		2040		2041		2042		2043		2044		2045		2046		2047		2048		2049		2050		2051		2052		2053		2054		2055		2056		2057		2058		2059		2060		2061		2062		2063		2064		2065		2066		2067		2068		2069		2070		2071		2072		2073		2074		2075		2076		2077		2078		2079		2080		2081		2082		2083		2084		2085		2086		2087		2088		2089		2090		2091		2092		2093		2094		2095		2096		2097		2098		2099		2100	
	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	2046	2047	2048	2049	2050	2051	2052	2053	2054	2055	2056	2057	2058	2059	2060	2061	2062	2063	2064	2065	2066	2067	2068	2069	2070	2071	2072	2073	2074	2075	2076	2077	2078	2079	2080	2081	2082	2083	2084	2085	2086	2087	2088	2089	2090	2091	2092	2093	2094	2095	2096	2097	2098	2099	2100																																																																																																															
1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	2046	2047	2048	2049	2050	2051	2052	2053	2054	2055	2056	2057	2058	2059	2060	2061	2062	2063	2064	2065	2066	2067	2068	2069	2070	2071	2072	2073	2074	2075	2076	2077	2078	2079	2080	2081	2082	2083	2084	2085	2086	2087	2088	2089	2090	2091	2092	2093	2094	2095	2096	2097	2098	2099	2100																																																																																																																
1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2																																																																																																																																																																																								

Copyright © 2004 John Wiley & Sons, Ltd.

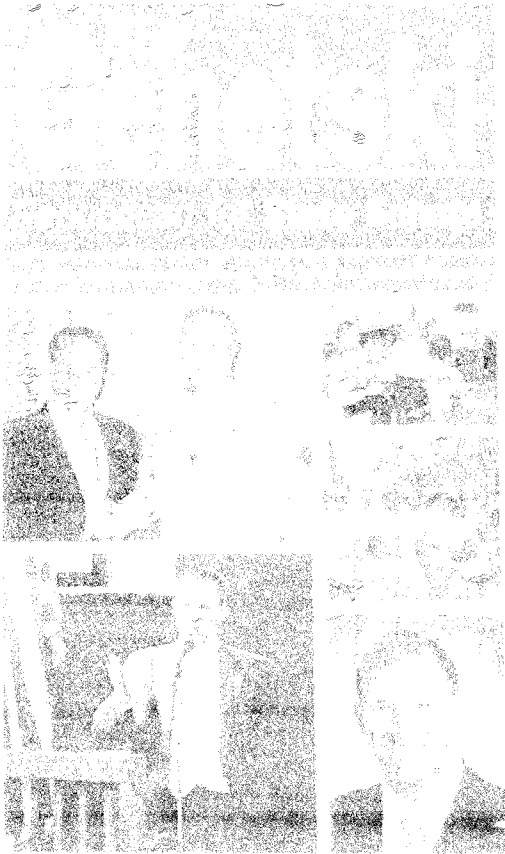
Water received around June 27, 2018

Attachment
D



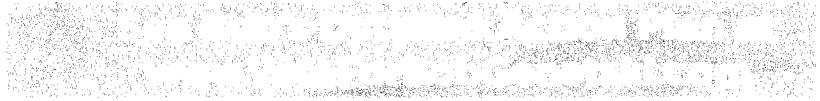
Mailer received around July 5, 2018

Attachment
E



Vote for Bob Genetski on August 14

Bob Genetski: **Let's Work It.**



LETTER FROM THE CAMPAIGN

Dear _____,

I am writing to you today to ask for your support for Bob Genetski in the upcoming election. Bob is a dedicated public servant who has worked hard to improve the lives of our community. He is a strong leader who will continue to fight for the people of our community.

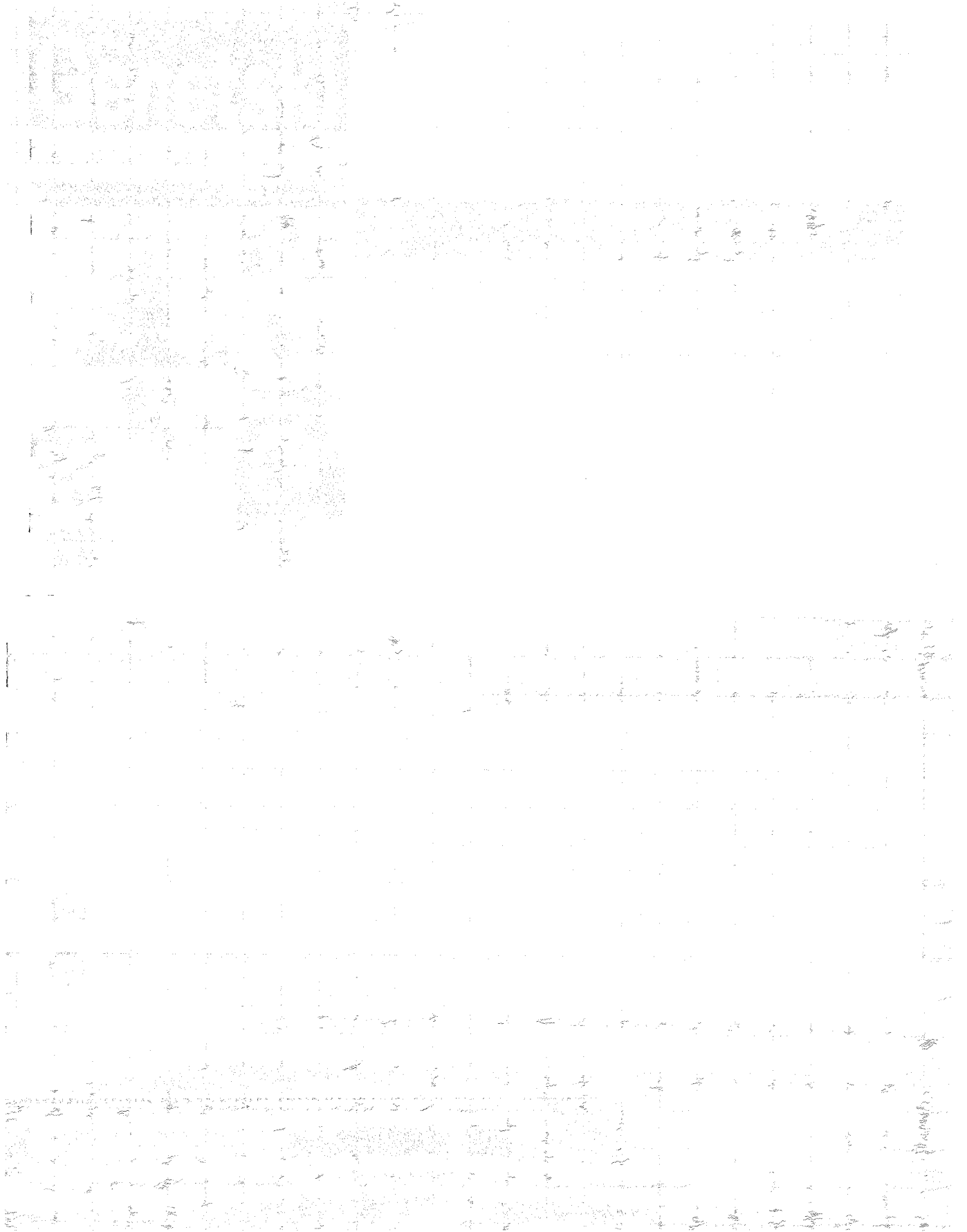
Bob Genetski is running for _____ on August 14. Please take the time to vote for Bob Genetski on August 14. Your vote is important and will make a difference.

Thank you for your support.

Sincerely,
Bob Genetski

Mail received. and. July 7, 1948

Attachment
F



Miller received and July 18, 2018

Attachment

3

Attachment 1 of 1

AGREEMENT FORM FOR POLITICAL CANDIDATE ADVERTISEMENTS

(Check applicable box)

☐ FEDERAL CANDIDATE

☒ STATE/LOCAL CANDIDATE

To Avail Themselves Of The Lowest Unit Charge During A Political Window, Federal Candidates Must Sign The Certification On Page 2

Station and Location:

Date:

WUO-TV

7/11

I, Bob Geretzke

being/on behalf of: Bob Geretzke for State Senate

a legally qualified candidate of the Republican

political party for the office of: State Senate

in the 26th District of Michigan

election to be held on: August 7, 2018

do hereby request station time as follows:

Broadcast Length	Time of Day, Rotation or Package	Days	Class	Times per Week	Number of Weeks
See attached					

Attach proposed schedule with charges (if available):

Attachment
2 of 3

I represent that the payment for the above described broadcast time has been furnished by:

Bob Gendall (Bob Gendall for the Senate)

and you are authorized to announce the time as paid for by such person or entity. I represent that this person or entity is either a legally qualified candidate or an authorized committee/organization of the legally qualified candidate.

The name of the treasurer of the candidate's authorized committee is:

Bob Gendall

This station has disclosed to me its political advertising policies, including: applicable classes and rates, and discount, promotional and other sales practices (not applicable to federal candidates).

THIS STATION DOES NOT DISCRIMINATE OR PERMIT DISCRIMINATION ON THE BASIS OF RACE OR ETHNICITY IN THE PLACEMENT OF ADVERTISING.

To Be Signed By Candidate or Authorized Committee

7/9/2018
Date

[Signature]
Signature

To Be Signed By Station Representative

☒ Accepted

☐ Accepted in Part

☐ Rejected

[Signature]
Signature

Alex Horowitz
Printed Name

NSH
Title

Attachment
4
345

Jul 12, 18
CONT# 31978062 Mod# Ver# 1 (Last =)
REP iHeartMedia
TO WOOD-AM (Grand Rapids, MI)
FM AMBER BEILSTEIN (INSIDE SALES)
OFF ATLANTA
AGY BOB GENETSKI FOR SENATE
ADDR 5079 136TH AVE
HAMILTON, MI 48419

DDS CONT# 0
C/P/E: 0/0/0
SALESPERSON FAX#
PH #

BYR CHARLES BASSETT
ADV BOB GENETSKI FOR SENATE
PDT Bob Genetski for Senate-BGFS
FLT Jul 11, 18 - Aug 07, 18

* REP ORDER COMMENT *

** 7/10/2018 11:05:00 AM:

[HTTP://RADIOEXCHANGE.CLEARCHANNEL.COM/SALES/CATEGORY/PAGES/POLITICALRATECARDS.ASPX](http://radioexchange.clearchannel.com/sales/category/pages/politicalratecards.aspx)

** 7/10/2018 11:05:00 AM: PLEASE CONFIRM ELECTRONICALLY WITH THE INSIDE SALES COORDINATORS
AT INSIDESALESCOORDINATORS@IHEARTMEDIA.COM. THANK YOU!

MC	LN	REV TYPE	DAYS	TIME	LEN	EFFECTIVE DATES	# OF WKS	NPW	RATE	TOT SPTS
		<u>FLIGHT 1</u>								
	1.1	INSIDE SALES - POLITICAL	..W....	6A - 10A	30	7/11/2018 - 7/11/2018	1W	3	\$110.00	3
	1.2	INSIDE SALES - POLITICAL	..W....	10A - 3P	30	7/11/2018 - 7/11/2018	1W	3	\$105.00	3
	1.3	INSIDE SALES - POLITICAL	...T...	6A - 10A	30	7/12/2018 - 7/12/2018	1W	2	\$110.00	2
	1.4	INSIDE SALES - POLITICAL	...T...	10A - 3P	30	7/12/2018 - 7/12/2018	1W	2	\$105.00	2
	1.5	INSIDE SALES - POLITICALF..	6A - 10A	30	7/13/2018 - 7/13/2018	1W	2	\$110.00	2
	1.6	INSIDE SALES - POLITICALF..	10A - 3P	30	7/13/2018 - 7/13/2018	1W	2	\$105.00	2
		** WEEKLY FLIGHT TOTALS **						14	\$1,505.00	
		<u>FLIGHT 2</u>								
	2.1	INSIDE SALES - POLITICAL	M.....	6A - 10A	30	7/16/2018 - 7/16/2018	1W	2	\$110.00	2
	2.2	INSIDE SALES - POLITICAL	M.....	10A - 3P	30	7/16/2018 - 7/16/2018	1W	2	\$105.00	2
		** WEEKLY FLIGHT TOTALS **						4	\$430.00	
		<u>FLIGHT 3</u>								
	3.1	INSIDE SALES - POLITICAL	M.....	6A - 10A	30	7/23/2018 - 7/23/2018	1W	2	\$110.00	2
	3.2	INSIDE SALES - POLITICAL	M.....	10A - 3P	30	7/23/2018 - 7/23/2018	1W	2	\$105.00	2

Attachment #1
4 of 5

Jul 12, 18
CONT# 31578862 Mod# Ver# 1 (Last =)
REP iHeartMedia

DDS CONT# 0
C/P/E: 0/0/0

3.3	INSIDE SALES - POLITICAL	.T....	6A - 10A	30	7/24/2018 - 7/24/2018	1W	1	\$110.00	1
3.4	INSIDE SALES - POLITICAL	.T....	10A - 3P	30	7/24/2018 - 7/24/2018	1W	1	\$105.00	1
3.5	INSIDE SALES - POLITICAL	..W....	6A - 10A	30	7/25/2018 - 7/25/2018	1W	1	\$110.00	1
3.6	INSIDE SALES - POLITICAL	..W....	10A - 3P	30	7/25/2018 - 7/25/2018	1W	1	\$105.00	1
3.7	INSIDE SALES - POLITICAL	...T...	6A - 10A	30	7/26/2018 - 7/26/2018	1W	1	\$110.00	1
3.8	INSIDE SALES - POLITICAL	...T...	10A - 3P	30	7/26/2018 - 7/26/2018	1W	1	\$105.00	1
3.9	INSIDE SALES - POLITICALF..	6A - 10A	30	7/27/2018 - 7/27/2018	1W	1	\$110.00	1
3.10	INSIDE SALES - POLITICALF..	10A - 3P	30	7/27/2018 - 7/27/2018	1W	1	\$105.00	1
** WEEKLY FLIGHT TOTALS **							12	\$1,290.00	
FLIGHT 4									
4.1	INSIDE SALES - POLITICAL	M.....	6A - 10A	30	7/30/2018 - 7/30/2018	1W	2	\$110.00	2
4.2	INSIDE SALES - POLITICAL	M.....	10A - 3P	30	7/30/2018 - 7/30/2018	1W	2	\$105.00	2
4.3	INSIDE SALES - POLITICAL	.T....	6A - 10A	30	7/31/2018 - 7/31/2018	1W	2	\$110.00	2
4.4	INSIDE SALES - POLITICAL	.T....	10A - 3P	30	7/31/2018 - 7/31/2018	1W	2	\$105.00	2
4.5	INSIDE SALES - POLITICAL	..W....	6A - 10A	30	8/1/2018 - 8/1/2018	1W	2	\$110.00	2
4.6	INSIDE SALES - POLITICAL	..W....	10A - 3P	30	8/1/2018 - 8/1/2018	1W	2	\$105.00	2
4.7	INSIDE SALES - POLITICAL	...T...	6A - 10A	30	8/2/2018 - 8/2/2018	1W	2	\$110.00	2
4.8	INSIDE SALES - POLITICAL	...T...	10A - 3P	30	8/2/2018 - 8/2/2018	1W	2	\$105.00	2
4.9	INSIDE SALES - POLITICALF..	6A - 10A	30	8/3/2018 - 8/3/2018	1W	2	\$110.00	2
4.10	INSIDE SALES - POLITICALF..	10A - 3P	30	8/3/2018 - 8/3/2018	1W	2	\$105.00	2
4.11	INSIDE SALES - POLITICALF..	3P - 7P	30	8/3/2018 - 8/3/2018	1W	2	\$105.00	2
** WEEKLY FLIGHT TOTALS **							22	\$2,360.00	
FLIGHT 5									
5.1	INSIDE SALES - POLITICAL	M.....	6A - 10A	30	8/6/2018 - 8/6/2018	1W	4	\$110.00	4
5.2	INSIDE SALES - POLITICAL	M.....	10A - 3P	30	8/6/2018 - 8/6/2018	1W	4	\$105.00	4
5.3	INSIDE SALES - POLITICAL	M.....	3P - 7P	30	8/6/2018 - 8/6/2018	1W	4	\$105.00	4

Attachment 11

5/15

Jul 12, 18
 CONT# 31978062 Mod# Ver# 1 (Last =)
 REP IHeartMedia

DDS CONT# 0
 C/P/E: 0/0/0

5.4	INSIDE SALES - POLITICAL	.T.....	6A - 10A	30	8/7/2018 - 8/7/2018	1W	4	\$110.00	4
5.5	INSIDE SALES - POLITICAL	.T.....	10A - 3P	30	8/7/2018 - 8/7/2018	1W	4	\$105.00	4
5.6	INSIDE SALES - POLITICAL	.T.....	3P - 7P	30	8/7/2018 - 8/7/2018	1W	4	\$105.00	4
** WEEKLY FLIGHT TOTALS **							24	\$2,560.00	

	Jul 18	Aug 18					
SPOTS	30	46					
CASH	3225.00	4920.00					
TRADE	0.00	0.00					
NSL	0.00	0.00					
TOTAL	3225.00	4920.00					

						TOTAL
SPOTS						76
CASH						8,145.00
TRADE						0.00
NSL						0.00
TOTAL						8,145.00

** Competitive Comments **

SVC: WI18 MSA ARB
 Demo Adults 18+

Nondiscrimination -Paragraphs 49 and 50 of the United States Federal Communications Commission's Report and Order No. 07-217 provides that broadcast stations' advertising contracts will not discriminate on the basis of race or ethnicity, and must contain nondiscrimination clauses. Consistent with this order, Katz Communications, Inc. (including any subsidiary or division of Katz) does not discriminate in any broadcast advertising contract on the basis of race or ethnicity and evaluates, negotiates and completes its broadcast advertising contracts without regard to race or ethnicity.

NAB Form PB-18 Candidates

AGREEMENT FORM FOR POLITICAL CANDIDATE ADVERTISEMENTS

(check applicable box)

☐ FEDERAL CANDIDATE☒ STATE/LOCAL CANDIDATE

To Avail Themselves Of The Lowest Unit Charge During A Political Window, Federal Candidates Must Sign The Certification On Page 3

Station and Location:

Date:

WKZO AM

7/19/2018

I, Bob Genetski

being/on behalf of:

Bob Genetski for State Senate

a legally qualified candidate of the

Republican

political party for the office of:

State Senate

in the

26th District of Michigan

election to be held on:

August 7, 2018

do hereby request station time as follows:

Time of	Class	Times per Week	Number of Weeks
5:00 - 5:30 PM	ASL	1	1
5:30 - 6:00 PM	ASL	1	1
6:00 - 6:30 PM	ASL	1	1
6:30 - 7:00 PM	ASL	1	1
7:00 - 7:30 PM	ASL	1	1
7:30 - 8:00 PM	ASL	1	1
8:00 - 8:30 PM	ASL	1	1
8:30 - 9:00 PM	ASL	1	1
9:00 - 9:30 PM	ASL	1	1
9:30 - 10:00 PM	ASL	1	1
10:00 - 10:30 PM	ASL	1	1
10:30 - 11:00 PM	ASL	1	1
11:00 - 11:30 PM	ASL	1	1
11:30 - 12:00 AM	ASL	1	1
12:00 - 12:30 AM	ASL	1	1
12:30 - 1:00 AM	ASL	1	1
1:00 - 1:30 AM	ASL	1	1
1:30 - 2:00 AM	ASL	1	1
2:00 - 2:30 AM	ASL	1	1
2:30 - 3:00 AM	ASL	1	1
3:00 - 3:30 AM	ASL	1	1
3:30 - 4:00 AM	ASL	1	1
4:00 - 4:30 AM	ASL	1	1
4:30 - 5:00 AM	ASL	1	1
5:00 - 5:30 PM	ASL	1	1

Attachment

NAB Form PB-15 Candidates

I represent that the payment for the above described broadcast time has been furnished by:

Bob Geneiski (Bob Geneiski for State Senate)

and you are authorized to announce the time as paid for by such person or entity. I represent that this person or entity is either a legally qualified candidate or an authorized committee/organization of the legally qualified candidate.

The name of the treasurer of the candidate's authorized committee is:

Bob Geneiski

This station has disclosed to me its political advertising policies, including applicable classes and rates, and discount, promotional and other sales practices (not applicable to federal candidates).

THIS STATION DOES NOT DISCRIMINATE OR PERMIT DISCRIMINATION ON THE BASIS OF RACE OR ETHNICITY IN THE PLACEMENT OF ADVERTISING.

To Be Signed By Candidate or Authorized Committee

7/9/2018
Date

[Signature]
Signature

To Be Signed By Station Representative

☒ Accepted
[Signature]
Signature

☐ Accepted in Part
MITCH RASMUSSEN
Printed Name

☐ Rejected
GS M
Title

07/17/18 1:57

Contract Agreement Between:
 Station: WKZO-TV, Inc.
 Contract: 347100
 Order: 347100
 Product: WKZO-TV, Inc.

Contract / Revision	347100 /	Alt Order #
Product		
Contract Dates	07/16/18 - 08/12/18	Estimate #
Advertiser	WKZO-TV, Inc.	Order Date / Revision
Billing Cycle	Broadcast	Cash/Trade
Billing Calendar	Broadcast	Cash
Prep Day	Account Executive	Sales Office
Special Handling		
Demographic	Household	
Advertiser Code	Advertiser Code	Product ID
Agency Ref	Advertiser Ref	

And:

WKZO-TV, Inc.
 1000 Westinghouse Blvd
 Flint, MI 48901

*Line	On	Start Date	End Date	Description	Start/End Time	Days	Length	Spots/Week	Rate	Type	Spots	Amount
M 1	WKZO	07/16/18	08/07/18	M-F 5a-10a	5a-10a		:30			PM	32	\$1,216.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>			
Week:		07/16/18	07/22/18	---TF--				6	\$38.00			
Week:		07/23/18	07/29/18	MTWTF--				7	\$38.00			
Week:		07/30/18	08/05/18	MTWTF--				11	\$38.00			
Week:		08/06/18	08/12/18	MT-----				8	\$38.00			
M 2	WKZO	07/16/18	08/07/18	M-F 10a-3p	10a-3p		:30			PM	32	\$768.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>			
Week:		07/16/18	07/22/18	---TF--				6	\$24.00			
Week:		07/23/18	07/29/18	MTWTF--				7	\$24.00			
Week:		07/30/18	08/05/18	MTWTF--				11	\$24.00			
Week:		08/06/18	08/12/18	MT-----				8	\$24.00			
M 3	WKZO	07/16/18	08/07/18	M-F 3p-8p	3:00 PM-7:00 PM		:30			PM	20	\$480.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>			
Week:		07/16/18	07/22/18	---TF--				8	\$24.00			
Week:		07/23/18	07/29/18	M-----				3	\$24.00			
Week:		07/30/18	08/05/18	----F--				3	\$24.00			
Week:		08/06/18	08/12/18	MT-----				8	\$24.00			
Totals											84	\$2,464.00

Time Period	# of Spots	Gross Amount	Agency Comm.	Net Amount
06/25/18 - 07/23/18	35	\$1,022.00	(\$153.30)	\$868.70
07/30/18 - 08/07/18	49	\$1,442.00	(\$216.30)	\$1,225.70
Totals	84	\$2,464.00	(\$369.60)	\$2,094.40



WKZO
4200 West Main
Kalamazoo, MI 49006
(269) 488-3308

Contract / Revision	Alt Order #
347101 /	

Contract Dates	Product	Estimate #
07/19/18 - 08/07/18		

Advertiser	Original Date / Revision
Bob Genetski for State Se	07/17/18 / 07/17/18

Signature: _____ Date: _____

We agree to pay for all advertising placed by us or by our agent, employee, or representative. It is Midwest Communications, Inc. policy to reserve the right to contact the agency/advertiser directly, as deemed necessary.

Our payment terms are net 30 days and if the account becomes past due we understand and agree that payment made by the agency and or advertiser to any firm or person other than Midwest Communications, Inc. shall not constitute payment to Midwest Communications, Inc. We further agree to pay for all collections cost, attorney fees, and court costs incurred in the collection of said accounts, regardless of whether judicial action is taken. A two week advance written cancellation notice is required unless otherwise specified.

Midwest Communications, Inc. and its affiliate WRIG, Inc. do not discriminate on the basis of race, color, religion, gender, national origin, age, disability or any other characteristic protected by state or federal law.

Contact Midwest Communications Accounting Department at the phone number listed above if you feel this contract is not valid.

Attachment I

S.O.F.S.

WK 20-AM

BOB GENETSKI FOR STATE SENATE.

			6am-10am	10am-3pm	3pm-7pm	(830)
	Thursday	19-Jul	3	3	3	
	Friday	20-Jul	3	3	3	
	Monday	23-Jul	3	3	3	
	Tuesday	24-Jul	1	1	0	
	Wednesday	25-Jul	1	1	0	
	Thursday	26-Jul	1	1	0	
	Friday	27-Jul	1	1	0	
	Monday	30-Jul	2	2	0	
	Tuesday	31-Jul	2	2	0	
	Wednesday	1-Aug	2	2	0	
	Thursday	2-Aug	2	2	0	
	Friday	3-Aug	3	3	3	
	Monday	6-Aug	4	4	4	
	Tuesday	7-Aug	4	4	4	
			\$ 38.00	\$ 24.00	\$ 24.00	
		Totals	32	32	20	
		Cost	\$ 1,216.00	\$ 768.00	\$ 480.00	
		Total	\$ 2,464.00			
		Netted Down	\$ 2,094.40			

Valles, Lydia (MDOS)

From: Robert Genetski <vote4bobgenetski@yahoo.com>
Sent: Monday, August 6, 2018 12:45 PM
To: SOS, Elections
Subject: self reporting of campaign ad missing disclaimer

Categories: Green Category

Dear Bureau of Elections,

My campaign would like to self-report a newspaper ad missing a disclaimer unintentionally.

The ad appeared in 5 newspapers one time.

Previous newspaper ads all did have disclaimers.

Please advise our campaign - Bob Genetski for State Senate - what further actions we need to take to be in compliance or good standing with Campaign Finance laws.

Bob Genetski



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

August 9, 2018

Robert Genetski
P.O. Box 475
Saugatuck, Michigan 49453

Re: *Rajzer v. Genetski*
Campaign Finance Complaint
No. 2018-07-56-47

Dear Mr. Genetski:

The Department of State (Department) received a formal complaint filed by Stephen Rajzer against you alleging violations of 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 requires candidates and committees file contributions and expenditures with the appropriate filing official by specific dates. MCL 169.233(1) – (3). The MCFA requires a committee that receives or expends more than \$1,000 during any election to file campaign finance reports in compliance with the Act. MCL 169.233(6). The failure to file a single campaign statement may trigger the assessment of late filing fees, while the failure to file two or more campaign statements is a misdemeanor offense. MCL 169.233(7)-(8).

Mr. Rajzer alleges that you have either underreported or failed entirely to report expenditures and reimbursements in violation of section 33. The Department notes that the complaint also raises section 47 allegations which for the reasons set forth in the attached letter are deemed resolved.

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 Mr. Rajzer, 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 57(4) 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", with a stylized flourish at the end.

Adam Fracassi
Bureau of Elections
Michigan Department of State

c: Stephen Rajzer



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

August 24, 2018

Stephen Rajzer
1109 West Franklin Street
Jackson, Michigan 49203

Dear Mr. Rajzer:

The Department of State received a response to the complaint you filed against Bob Genetski, 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: Bob Genetski

Monday, August 20, 2018

RECEIVED
MICHIGAN DEPT

AUG 22

10:00 AM

Adam Fracassi
Bureau of Elections
Michigan Department of State

Re: Rajzer v. Genetski
Campaign Finance Complaint
No. 2018-070-56-47

Dear Mr. Fracassi:

In response to a complaint filed by Mr. Stephen Rajzer on Aug. 2, 2018 with your office regarding campaign violations(MCFA). Two letters were received from your office regarding the nature and content of the violations. Per your determination, Mr. Rajzer accused the Bob Genetski for State Senate Campaign of violating Section 33 and Section 47 of MCFA. The first letter states the full complaint(full letter) and the second letter addresses specifically the Section 47 violation(47 letter).

In the 47 letter your office determined that it was satisfied with the campaign's response and the appropriate steps for action necessary by the Bob Genetski for State Senate in response to item 1 of Mr. Rajzer's complaint. To quote, "The Department considers the instant action closed and resolved." We appreciate the Department's guidance and decision on the Sec. 47 matter.

In regard to the full letter, we proffer the following specific answers to Mr. Rajzer's complaint regarding violations of Sec. 33. Under the subheading of Unreported expenditures there are four complaints 2a-signs, 2b-Facebook, 2c-mailings, 2d-radio.

2a-signs. Reflected in amended reimbursements

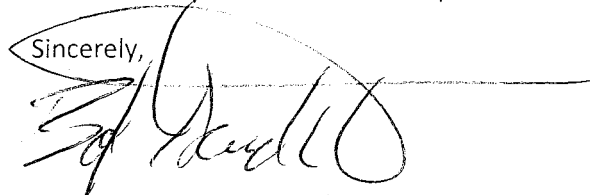
2b-Facebook. Reflected in amended reimbursements

2c-mailings. Reflected in amended reimbursements

2d-radio. Reflected in amended reimbursements

Under the subheading Improperly reported reimbursements, the MERTS software used by the reporter does not automatically funnel the report to a sub-itemize category for the transaction. The reporter, bookkeeper Brian Polet, was unaware of this mandate and unknowingly filed accordingly. We will amend the report to reflect the expenses. Thanks for your consideration in this matter.

Sincerely,



Bob Genetski

BG:bp



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

October 11, 2018

Robert Genetski
P.O. Box 475
Saugatuck, Michigan 49453

Re: *Rajzer v. Genetski*
Campaign Finance Complaint
No. 2018-07-56-47

Dear Mr. Genetski:

The Department of State (Department) has concluded its investigation into the formal complaint filed by Stephen Rajzer against you alleging violations of the Michigan Campaign Finance Act (MCFA or Act), 1976 PA 388, MCL 169.201 *et seq.* This letter concerns the disposition of the complaint.

Mr. Rajzer filed his complaint on August 2, 2018 and alleged that you either underreported or failed entirely to report expenditures and reimbursements in violation of section 33.¹ Specifically, Mr. Rajzer alleged that expenditures for campaign signs, Facebook advertisements, mailings, and radio advertisements were not reported accurately in violation of section 33.

By letter dated August 20, 2018, you responded indicating that these expenditures were unknowingly and unintentionally filed inaccurately. You also indicated that the expenditures were corrected in your amended reports. Mr. Rajzer chose not to file a rebuttal statement.

The MCFA requires candidates and committees file contributions and expenditures with the appropriate filing official by specific dates. MCL 169.233(1) – (3). The MCFA requires a committee that receives or expends more than \$1,000 during any election to file campaign finance reports in compliance with the Act. MCL 169.233(6). The failure to file a single campaign statement may trigger the assessment of late filing fees, while the failure to file two or more campaign statements is a misdemeanor offense. MCL 169.233(7)-(8).

Upon review, and based upon your admission, the evidence supports the conclusion that expenditures were inaccurately filed in violation of section 33. MCL 169.233. After making this determination, the Department must “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

¹ The Department previously issued a warning letter for the allegations brought under section 47.

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 your admission and the immediate correction to the reports, the Department determines that this warning is an appropriate resolution to the complaint and hereby advises you of your reporting obligations under section 33. As indicated above, section 33 requires candidates to accurately report all contributions and expenditures; the failure to do so may result in civil fines and penalties. MCL 169.233(7)-(8),

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 169.233(7)-(8), 215(10).

Therefore, the Department considers this instant action closed and resolved.

Sincerely,

A handwritten signature in dark ink, appearing to read "Adam Fracassi", with a stylized, looping flourish at the end.

Adam Fracassi
Bureau of Elections
Michigan Department of State

c: Stephen Rajzer