



**Michigan Department of State
Campaign Finance Complaint Form**

BUREAU OF ELECTIONS • RICHARD H. AUSTIN BUILDING - 1st Floor
430 W. ALLEGAN STREET • LANSING, MICHIGAN 48918

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ELECTIONS/GREAT SEAL

This complaint form may be used to file a complaint alleging that someone violated the Michigan Campaign Finance Act (MCFA). For instructions on how to complete this form, see the Campaign Finance Complaint Guidebook & Procedures document. All spaces are required unless otherwise indicated.

Section 1. Complainant			
Your Name <i>James Warner</i>		Daytime Telephone Number <i>517-962-3845</i>	
Mailing Address <i>710 4th St.</i>			
City <i>JACKSON</i>	State <i>MI</i>	Zip <i>49203</i>	
Email (optional) <i>James Warner 8907 @ Yahoo. com</i>			

Section 2. Alleged Violator			
Name <i>Will Forgrave</i>			
Mailing Address <i>P.O. box 1451</i>			
City <i>JACKSON</i>	State <i>MI</i>	Zip <i>49204</i>	
Email (optional)			

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

Section(s) of the MCFA alleged to be violated: *Sec. 47*

Explain how those sections were violated:

Improper identification, does not include address, as
Required.

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

See enclosed Yard signs, Flyers, Website, Social media
ads.

Hello! I'm Will Forgrave,

and I'm asking for your vote to make sure an honest and principled City Council member represents you in Ward 6 come Nov. 5.

I've reported on local government officials as well as worked for them, first as a reporter for the Jackson Citizen Patriot and then as a public information officer for the City of Jackson. I've witnessed firsthand what works and what doesn't work at City Hall ... and I've witnessed a lot.

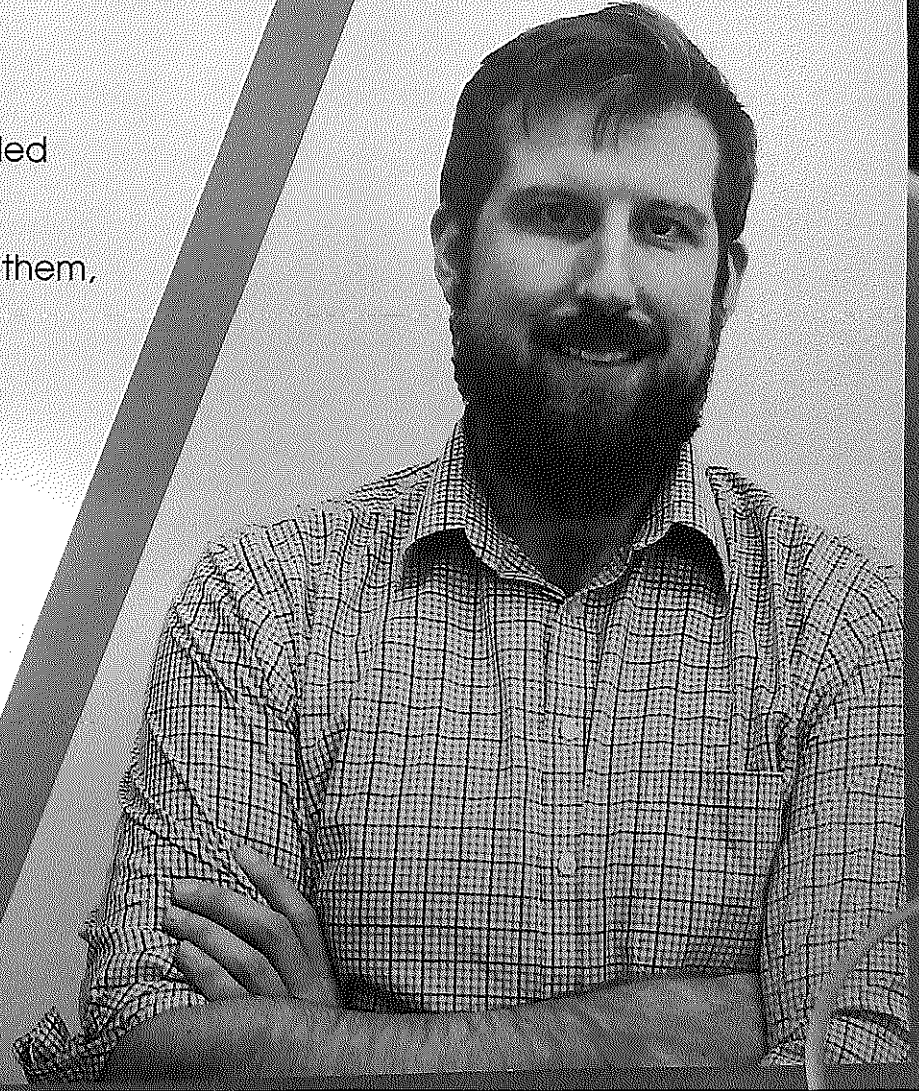
I'm dedicated my life to holding Jackson leaders accountable, and over the years one thing has become increasingly clear:

WE CAN DO BETTER.

Jackson City Hall is in desperate need of honest leaders, accountable actors, and independent thinkers, and I plan to roll up my sleeves and deliver results.

WILL FORGRAVE

FOR JACKSON CITY COUNCIL



It's time for honest representatives
we can trust to do what's right.

I'LL ACTUALLY PRIORITIZE ROAD FUNDING

To say roads are a priority while spending tens of millions on new buildings downtown - including a public kitchen with a price tag of \$5 million - is unethical. If roads are really a priority, *let's begin paying for them with the millions of tax dollars we already have.*

I'LL GIVE YOU A SAY IN CITY POLICY

I'll introduce legislation to make sure you have a say in whether the City can charge you and your family exorbitant special fees. As of now, local leaders can charge you tens of thousands for infrastructure work without repercussion. *That's unacceptable.*

I'LL BOLSTER & RESPECT PUBLIC SAFETY

I'll make sure we put more public safety boots on the ground to keep you and your family safe. With more than \$6 million in the City's general fund, *the money is there to hire police and firefighters.*

Vote Tuesday, November 5



www.forgravefor6.com



[/ForgraveFor6](https://www.facebook.com/ForgraveFor6)



517.316.5750



forgravefor6@gmail.com

WILL FORGRAVE

FOR JACKSON CITY COUNCIL

Paid for by the Friends of Will Forgrave Committee

DONATE

Please chip in whatever you can to continue to build momentum and to make sure that an honest and principled representative takes the 6th Ward City Council seat November 5th. While some politicians accept local PAC funds and donations from business interests, I've made a promise to only accept donations from individuals looking to make a positive change for Jackson residents like themselves. For those who prefer to mail a check, please make them payable to "The Friends of Will Forgrave Committee" and mail them to:

Will Forgrave
PO Box 1451
Jackson, MI 49204

All donations are secure, and will go toward the Friends of Will Forgrave Committee.

For the official campaign. For Jackson.



9

Contributors

\$480

Donated

17

Days left



Let's do it!

JOIN THE CONVERSATION:



Will Forgrave for City Council



Will Forgrave for City Council

@ForgraveFor6

Political Organization · 370 likes

Page transparency

See More

Page created Mar 25, 2019

Page name has not changed

Primary country location for people who manage this Page includes: United States (2)

Total spent by Page on ads about social issues, elections or politics

May 2018 - Oct 16, 2019
United States

\$333

See spend details

Recently spent by Page on ads about social issues, elections or politics

7 days · Oct 10 - Oct 16, 2019
United States

≤\$100

See spend details

Filter By: United States Active and Inactive

View: All Ads Issue, Electoral or Political

Disclaimers used by this Page ✕

Disclaimer	Amount spent United States
Friends of Will Forgrave	\$333
Total spent by Page	\$333



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

November 5, 2019

Will Forgrave
PO Box 1451
Jackson, Michigan 49204

Re: *Warner v. Forgrave*
Campaign Finance Complaint
No. 2019-10-47-47

Dear Mr. Forgrave:

The Department of State (Department) has received a formal complaint alleging you have violated MCL 169.247 of the Michigan Campaign Finance Act (MCFA) by failing to include a complete and correct identification statement on certain campaign-related materials. A copy of the complaint is enclosed.

The complaint was submitted to the Department on October 24, 2019 and alleges that you have distributed campaign materials that did not include a proper paid for by statement. A picture of the campaign materials is included with the complaint and is enclosed.

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

Upon review, the evidence submitted supports the conclusion that a potential violation of the Act has occurred. From the outset, the Department must consider whether it is an expenditure covered by the MCFA. The flyer specifically states "Will Forgrave for Jackson City Council" which uses words of express advocacy as defined by the Act. MCL 169.206(2)(j). The same disclaimer is used on yard signs and your campaign website. Because it urges voters to vote for you using words of express advocacy and was published by your committee, the flyer is covered by the gambit of the Act and must include the paid for by statement outlined under section 47. MCL 169.206(2)(j). While the paid for by statement is present, it fails to contain the full address of the committee as required by the Department's rules thereby leaving the Department with reason to believe that a potential violation of the Act has occurred.

Will Forgrave
November 5, 2019
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After reaching this conclusion, the Act requires the Department to “endeavor to correct the violation or prevent a further violation by using informal methods [.]” if it finds that “there may be reason to believe that a violation ... has occurred [.]” MCL 169.215(10). The objective of an informal resolution is “to correct the violation or prevent a further violation [.]” *Id.*

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

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

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

Sincerely,



Adam Fracassi
Bureau of Elections
Michigan Department of State

Enclosure
c: James Warner