



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

June 15, 2018

Committee to Election Mike Saari for State Senate
1902 Dawn Ridge Road
Commerce Township, Michigan 48390

Re: *Steele v. Committee to Elect Mike Saari for State Senate*
Campaign Finance Complaint
No. 2018-06-019-47

Dear CTE Mike Saari:

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

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

The Act also requires the Department to "endeavor to correct the violation or prevent a further violation by using informal methods [.]" if it finds that "there may be reason to believe that a violation ... has occurred [.]". MCL 169.215(10). The objective of an informal resolution is "to correct the violation or prevent a further violation [.]". *Id.*

There are two pictures of campaign materials that have been provided which lead to the conclusion that a violation of the MCFA has occurred. MCL 169.247. In support of the complaint, copies of these pictures were provided, and have been enclosed with this communication.

Upon review, it appears that the paid for by statement is omitted from the campaign materials in violation of MCL 169.247. Given this, the Department is hereby advising you that MCL 169.247(1) and R 169.36(2) require you to print a complete and accurate identification statement on all campaign materials, consisting of the phrase "paid for by" followed by the full name and address of the committee paying for such materials. Note that all printed materials that refer to an election or your candidacy produced in the future must include this identification statement.

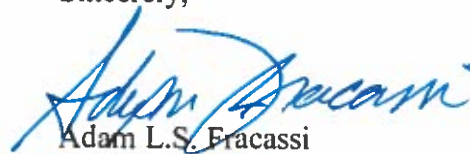
CTE Mike Saari
June 15, 2018
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If this information has been included on your campaign materials, please provide this office evidence demonstrating the proper paid for by statements.

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

The Department considers the instant action closed and resolved.

Sincerely,



Adam L.S. Fracassi
Bureau of Elections
Michigan Department of State

c: Shawn Steele

2018-06-01-47

Campaign Finance Complaint Form
Michigan Department of State

RECEIVED FILED
MICHIGAN DEPT. OF STATE

2018 JUN 13 AM 9:29

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 169.201-224). 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 | Shawn Steele | Daytime Telephone Number |
| | | 248-289-3083 |
| Mailing Address | 5799 S. Main St #1851 | |
| City | State | Zip |
| Clarkston | MI | 48347-9998 |

| Section 2. Alleged Violator | | |
|-----------------------------|--|-------|
| Name | Elect Mike Saari For State Senate - Committee ID# 518315 | |
| Mailing Address | 1902 Dawn Ridge Rd | |
| City | State | Zip |
| Commerce Township | MI | 48390 |

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

Section(s) of the MCFA violated:

MCL 169.247

Explain how those sections were violated:

See attached

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

See attached

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  6-6-18
Signature of Complainant Date

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

Section 15(6) of the MCFA (MCL 169.215) requires that the signed certification found in section 4 of this form be included in every complaint. However, if, after a reasonable inquiry under the circumstances, you are unable to certify that certain factual contentions are supported by evidence, you may also make the following certification:

I certify that to the best of my knowledge, information, or belief, there are grounds to conclude that the following specifically identified factual contentions are likely to be supported by evidence after a reasonable opportunity for further inquiry. Those specific contentions are:

N/A

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 - ELECT MIKE SAARI FOR STATE SENATE - Committee ID# 518315

Section 3

Section of MCFA - MCL 169.247

""""(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.""""

Mr. Saari's campaign has placed campaign signs expressly advocating for his election in right of ways and on a banner in front of his address. On at least one of his signs, there is no indicator who paid for his signs.

Evidence of violation:





