

**STATE OF MICHIGAN  
BUREAU OF ELECTIONS**

CAMPAIGN FINANCE COMPLAINT

**Section 1. COMPLAINANT**

Jeff Timmer  
10018 E Grand River Avenue  
Portland, MI 48875

**Section 2. ALLEGED VIOLATOR**

James Craig  
11 Sand Bar Lane  
Detroit, MI 48214

**Section 3. ALLEGATIONS**

Sections of Michigan Campaign Finance Act (MCFA) alleged to be violated: MCL 169.224(1).

**STATEMENT OF FACTS**

1. "Candidate" is defined in Sec. 3(1) of the MCFA, MCL 169.203(1), as an individual who meets 1 or more of the following criteria:

(a) Files a fee, an affidavit of incumbency, or a nominating petition for an elective office.

(b) Is nominated as a candidate for elective office by a political party caucus or convention and whose nomination is certified to the appropriate filing official.

(c) Receives a contribution, *makes an expenditure, or gives consent for another person to receive a contribution or make an expenditure with a view to bringing about the individual's nomination or election to an elective office, whether or not the specific elective office for which the individual will seek nomination or election is known at the time the contribution is received or the expenditure is made.* (emphasis added).

2. Section 21 of the MCFA, MCL 169.221, mandates that:

A candidate, within 10 days after becoming a candidate, shall form a candidate committee. An individual who is a candidate for more than 1 office shall form a candidate committee for each office for which the individual is a candidate, if at least 1 of the offices is a state elective office. A candidate shall not form more than 1 candidate committee for each office for which the individual is a candidate.

3. "Person" is defined in Sec. 11(2) of the MCFA, MCL 169.211(2) as:

a business, individual, proprietorship, limited liability company, firm, partnership, joint venture, syndicate, business trust, labor organization, company, corporation, association, committee, or any other organization or group of persons acting jointly.

4. "Contribution" is defined in Sec. 4(1) of the MCFA, MCL 169.204(1), as follows:

a payment, gift, subscription, assessment, expenditure, contract, payment for services, dues, advance, forbearance, loan, or donation of money or anything of ascertainable monetary value, or a transfer of anything of ascertainable monetary value to a person, made for influencing the nomination or election of a candidate, for the qualification, passage or defeat of a ballot question, or for the qualification of a new political party.

5. "Expenditure" is defined in Sec. 6(1)(a) of the MCFA, MCL 169.206(1)(a), as follows:

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:

- (a) A contribution or transfer of anything of ascertainable monetary value for purposes of influencing the nomination or election of a candidate, the qualification, passage or defeat of a ballot question, or the qualification of a new political party.

6. Section 24(1) of the MCFA, MCL 169.224(1), mandates, without administrative discretion or good excuse, penalties for individuals who fail to timely file a statement of organization for a candidate committee, providing that:

A person who fails to file a statement of organization required by this subsection shall pay a late filing fee of \$10.00 for each business day the statement remains not filed in violation of this subsection. The late filing fee must not exceed \$300.00. A person who violates this subsection by failing to file for more than 30 days after a statement of organization is required to be filed is guilty of a misdemeanor punishable by a fine of not more than \$1,000.00.

7. As early as May 2021, James Craig began making expenditures in furtherance of securing his nomination as the Republican candidate for Michigan Governor. According to a May 7, 2021 report in Politico.com:

*“Craig has spent recent days meeting with GOP leaders, including Ron Weiser, the chair of the Michigan Republican Party, according to a person familiar with the deliberations. Craig has also spoken with Arizona Gov. Doug Ducey, the chair of the Republican Governors Association, according to a second person familiar with that discussion.” (Ex. 1).*

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This report was confirmed by WDIV, Channel 4, in Detroit. (Ex. 2).

8. On June 9, 2021, WLNS in Lansing reported that:

*“Craig is in no hurry to announce for the job he does want. He’s trying to hide his lead political consultant, and there is an internal dissension over that. Former governor John Engler is advising the chief not to hire long time west Michigan consultant John Yob. But, the state party chair Ron Weiser is telling the chief that Yob would be a good choice. Former Governor Rick Snyder and his right hand man Rich Baird are also talking with Craig, and so is former GOP candidate for governor Dick Devos, and former house GOP speaker Jase Bolger.” (Ex. 3).*

9. Since May 7th news of his retirement, James Craig has made 27 appearances on Fox News Channel and Fox Business Channel. These appearances required James Craig to at least

utilize an internet connection to participate via Zoom or other platform and likely involved using the services of a paid media consultant. Moreover, any claim that the services were provided on a “volunteer” basis is not dispositive. A volunteer’s personal services do not count as a contribution *only if there* is no understanding or agreement that compensation will be received for the time donated. At a minimum a determination cannot be made in this regard without a full compliance investigation, with testimony being taken subject to the penalties of perjury.

10. On or around June 3, 2021, James Craig told Nolan Finley with the Detroit News that “He's prepping by ‘getting tight’ on issues he hasn't been involved in, but will be expected to have an opinion on: ‘Whether it's critical race theory, pro-life. Everything.’” (Ex. 4).
11. On June 23, 2021, James Craig told Fox News that “things are moving along at a great pace” when it comes to his potential Republican run for Michigan governor in 2022. (Ex. 5).
12. On July 6, 2021, James Craig made a political speech in Jackson County, Michigan. He arrived in an SUV, was escorted by several staffers, including political consultants John Yob and Ted Goodman, and used a teleprompter during his speech. (Ex. 6). Again, any claim that the services were provided on a “volunteer” basis is not dispositive and is suspect under the circumstances of this case. At a minimum a determination should not be made in this regard without a full compliance investigation, with testimony being taken subject to the penalties of perjury.
13. In a July 15, 2021 Detroit Free Press article reporting on a bankruptcy filing by James Craig, Ted Goodman is identified a Craig’s “political adviser.” (Ex. 7).


14. As evidenced in multiple media reports, for the last two months James Craig has made expenditures of gas, telephone, internet, and other incidental expenses in furtherance of his nomination as the Republican candidate for Governor. James Craig has also hired or retained political and media consultants, including but not limited to John Yob and Ted Goodman. *See* Ex. 3, 6, 7.
15. Upon information and belief, James Craig is receiving contributions and making expenditures in support of his candidacy to be the Republican nominee for Governor and has been doing so since on or after May 7, 2021 through the current date.
12. However, to date, James Craig has failed to file a statement of organization with the Bureau of Elections registering a candidate committee as required by MCL 169.224(1).

#### **Section 4. SUMMARY OF ALLEGED VIOLATIONS**

Based on the above-referenced facts and the applicable law, James Craig has failed to register candidate committee in violation of MCL 169.224(1) because starting on or after May 7, 2021 he has received contributions and made expenditures in support of his election to the office of Governor through the present date.

#### **Section 5. CERTIFICATION**

I certify 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.

  
\_\_\_\_\_

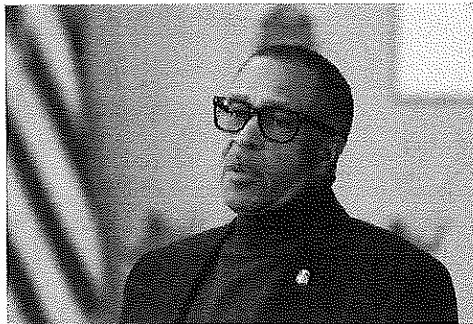
July 19, 2021  
\_\_\_\_\_

Date

## ELECTIONS

## Detroit police chief preps Michigan governor campaign against Whitmer

James Craig has been in talks with Republican officials in Michigan about a campaign



Detroit Police Chief James Craig speaks during a press briefing on the coronavirus. (Carter Owens/AP Photo)

By ALEX ISHAKIAN  
6/5/2021 5:24 PM EDT



Detroit Police Chief James Craig, a Republican and a veteran of police departments around the country, is preparing to challenge Democratic Gov. Gretchen Whitmer in Michigan, potentially giving the GOP a formidable candidate in one of the midterm election's highest profile gubernatorial contests.

Craig has spent recent days meeting with GOP leaders, including Ron Weiser, the chair of the Michigan Republican Party, according to a person familiar with the deliberations. Craig has also spoken with Arizona Gov. Doug Ducey, the chair of the Republican Governors Association, according to a second person familiar with that discussion.

Word of Craig's interest comes as the country grapples issues of race and policing following a year that saw high-profile killings of Black people at the hands of law enforcement. The May 2020 killing of George Floyd in Minneapolis resulted in a national wave of protests and a renewed focus on police conduct.

Craig, who is Black, recently praised the outcome of the Derek Chauvin trial in that case, saying, "the justice system worked." But he said the case "was a stain on our profession" and said it was not "reflective" of law enforcement as a whole.

While Craig, a Detroit native who has been police chief since 2013, has said that police officers should be held "accountable for violating their oath and breaking the law," he has also been an outspoken defender of law enforcement. He sharply criticized Detroit-area Democratic Rep. Rashida Tlaib after she tweeted in April that "policing in our country is inherently & intentionally racist," and there should be "no more policing."

Craig called for Tlaib's resignation in response, saying during an appearance on CNN that her comments were "reckless and disgusting."

Detroit-based reporter Charlie LeDuff and Fox 2 reported Friday evening that Craig is preparing to retire from the department and is considering a political campaign.

The police chief has long cut a conservative profile. Craig has said that more Detroiters should be armed in order to drive down crime, and he has said that terrorists are less likely to attack Detroit because a substantial number of its residents have concealed carry permits.



Whitmer has emerged as a top Republican target in 2022, drawing fierce criticism from conservatives over her coronavirus lockdown policies. She has also faced blowback for not adhering to the stringent restrictions she's put in

place, including the revelation of her recent travel to Florida to visit her elderly father.

A February EPIC-MRA poll found Whitmer's approval rating at 52 percent, down from 56 percent in September.

Republicans have been seeking out a viable challenger to Whitmer. Tudor Dixon, a conservative TV news anchor, is prepping a campaign, and Republican National Committee Chair Ron DeSantis floated a possible run at a recent meeting with party officials.

Senior Republicans contend that Craig would make a strong candidate because he could potentially win support in vote-rich Wayne County, which includes Detroit and which regularly gives Democratic candidates large margins of victory. Whitmer received more than 70 percent of the vote in 2018 in Wayne County, which is 39 percent Black.

John James, a Black veteran, was the Michigan GOP's Senate nominee in each of the past two elections but fell short both times, running about the same as Republican ticket-mates in Wayne County in 2018 and 2020.

## The Fifty



In the unfolding pandemic, economic crisis and reckoning on race, governors and mayors are shaping our shared future. Who are the power players, and how are they driving politics and influencing Washington?

[Full coverage »](#)

But Craig will start his first campaign with a higher public profile in Detroit. Before he was named police chief there in 2013, he had served as chief of the Cincinnati and Portland, Maine police departments, according to his official biography. He also served decades as a police officer in Los Angeles.

**FILED UNDER:** ELECTIONS, MICHIGAN, GRETCHEN WHITMER, THE FIFTY

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**SIGN UP**

## Exhibit 2

**LOCAL NEWS**

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 Single-Cross, With Friends  
 May 24 at Friends, Expo

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## Sources say Detroit police Chief James Craig set to retire, considering future politics

James Craig appointed to position in 2013



**DETROIT** - James Craig is set to announce his retirement as chief of the Detroit Police Department, according to sources.

Sources told Local 4 that a press conference will be held Monday.

Craig has been the chief of the Detroit Police Department for the last eight years. He was appointed by Emergency Manager Kevin Orr in July of 2013. He's the longest serving chief in the City of Detroit since Chief Bill Harte.

He came to Detroit after being as chief of the Cincinnati Police Department for two years. Prior to that he spent two years as chief of the Portland Police Department in Maine. He's been married in Canton, while he was based, in 1977. After there was a downsizing of the Detroit Police Department he joined the Los Angeles police force and worked there for 25 years.

Several news sources are reporting that Craig could run against Michigan Gov. Gretchen Whitmer at the Republican end of the race for governor.

GOP sources confirm Craig has had a meeting with several Republican donors. Politico is reporting he's already had a call with the Republican Governors' Association.

"We got a lot of people talking, it's national news. Republicans from Lansing to Oakland County are excited about the potential news," said political strategist Dennis Dornot.

Craig has a press conference scheduled for 2 p.m. Monday May 10 to announce his retirement June 1. It is unclear whether he will go in depth on his future plans.

the Durbin  $s_d$  data, a real constant

You see how excited people on the Republican side of the ledger are about the potential of him winning, he said. "There are other candidates out there running who have already announced who haven't garnered as much attention in three months as this guy has garnered in three hours."

Local 4 reached out to the Mayor Mike Duggan's office who said the chief has not indicated to the mayor that he has made any decisions about his future.

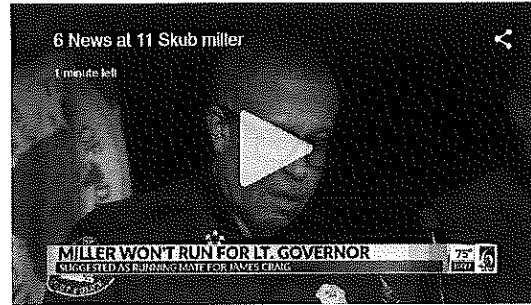
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## Exhibit 3

## NEWS

## Skubick: Will Candice Miller run as Craig's Lt. Governor?



By: Wits Foster, Tim Skubick

Posted: Jun 5, 2021 / 11:32 PM EDT / Updated: Jun 5, 2021 / 11:39 PM EDT

LANSING, Mich. (WLNS) — A major new development tonight in the race for governor, which is not good news for the yet to be announced candidate James Craig. News 6's Tim Skubick has an exclusive behind the scenes look of what is happening in the Craig camp.

Everybody knows that Macomb County's Candice Miller does not want to run for governor, but what about running for Lt. Governor with former Detroit Police Chief James Craig?

Supporters of under-laud candidate Craig are calling it a dream to let to have Miller as his running mate. The only problem is the dream just went poof.

That's because privately, Miller revealed she does not want the job.

Ms. Miller has privately told lots of folks she's content being the county public works commissioner and does not want to be running around all over the state campaigning for Lt. Governor.

Craig is in no hurry to announce for the job he does want. He's trying to hide his lead political consultant, and there is an internal discussion over that.

Former governor John Engler is advising the chief not to hire long time west Michigan consultant John Yolo.

But, the state party chair Ron Weber is telling the chief that Yolo would be a great choice.

Former Governor Rick Snyder and his right hand man Rick Batra are also talking with Craig, and so is former GOP candidate for governor Dick DeVos, and former house GOP speaker Ise Bulger.

And former House GOP Speaker Lee Chatfield, but the Craig camp has another problem.

Mr. Craig might have competition for the nomination from Oakland County car dealership owner, 70 year old Kevin Blake and multi millionaire business owner Perry Johnson from Troy.

As for Whelaner:

"I'm not in any position of giving anybody who may or may not run for governor advice. I think the Republican primary voters will make the decision in 14 months from now, and we'll see who that person is."

We'll see.

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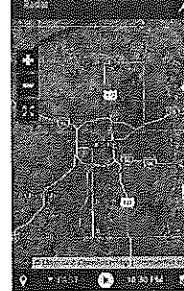
Tomorrow  
64°

Mostly  
Cloudy

Thursday  
78°

Island  
Breezy

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## FOOTNOTES

W. J. P.

11/19/2018 7:10 AM

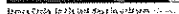
James Craig hasn't announced a run for governor yet, although he's expected to, one of these days. He's piepping by "getting tight" on issues he hasn't been involved in, but will be expected to have an opinion on. "Whether it's critical race theory, pro-life, everything," he tells Nolan Finley in today's Detroit News.

But one thing he's happy to share are thoughts about policing, which is in a crisis, he claims:

The only way to end the crisis is for the people who sit in seats of influence and leadership to come together on behalf of those who are most impacted by the dysfunction and crisis we are in. It's primarily those who live in vulnerable communities. Who fights for them? Who fights for the families of victims of those caught up in violence?"

Craig sees the most alarming threat to policing as not in calls to defund police departments, though he thinks that's idiotic, but in the movement to strip police officers of their qualified immunity that allows them to be personally sued for actions taken in the line of duty. That's already happened in New York City.

And so on. The piece is paywalled, but here's a spoiler: Craig is not quoted saying anything about police brutality, and expresses sympathy for officers who may not "feel supported" in today's atmosphere.



## Contributors

John Keight	Charles Keight
Henry Keight	Chas. Keight
Wm. Keight	Michael Keight
John Keight	Henry Keight
John Keight	Henry Keight

### Photo Of The Day



1. 2014-2015-2016-2017-2018-2019-2020-2021-2022-2023-2024-2025-2026-2027-2028-2029-2030-2031-2032-2033-2034-2035-2036-2037-2038-2039-2040-2041-2042-2043-2044-2045-2046-2047-2048-2049-2050-2051-2052-2053-2054-2055-2056-2057-2058-2059-2060-2061-2062-2063-2064-2065-2066-2067-2068-2069-2070-2071-2072-2073-2074-2075-2076-2077-2078-2079-2080-2081-2082-2083-2084-2085-2086-2087-2088-2089-2090-2091-2092-2093-2094-2095-2096-2097-2098-2099-2100-2101-2102-2103-2104-2105-2106-2107-2108-2109-2110-2111-2112-2113-2114-2115-2116-2117-2118-2119-2120-2121-2122-2123-2124-2125-2126-2127-2128-2129-2130-2131-2132-2133-2134-2135-2136-2137-2138-2139-2140-2141-2142-2143-2144-2145-2146-2147-2148-2149-2150-2151-2152-2153-2154-2155-2156-2157-2158-2159-2160-2161-2162-2163-2164-2165-2166-2167-2168-2169-2170-2171-2172-2173-2174-2175-2176-2177-2178-2179-2180-2181-2182-2183-2184-2185-2186-2187-2188-2189-2190-2191-2192-2193-2194-2195-2196-2197-2198-2199-2200-2201-2202-2203-2204-2205-2206-2207-2208-2209-2210-2211-2212-2213-2214-2215-2216-2217-2218-2219-2220-2221-2222-2223-2224-2225-2226-2227-2228-2229-2230-2231-2232-2233-2234-2235-2236-2237-2238-2239-2240-2241-2242-2243-2244-2245-2246-2247-2248-2249-2250-2251-2252-2253-2254-2255-2256-2257-2258-2259-2260-2261-2262-2263-2264-2265-2266-2267-2268-2269-2270-2271-2272-2273-2274-2275-2276-2277-2278-2279-2280-2281-2282-2283-2284-2285-2286-2287-2288-2289-2290-2291-2292-2293-2294-2295-2296-2297-2298-2299-2300-2301-2302-2303-2304-2305-2306-2307-2308-2309-2310-2311-2312-2313-2314-2315-2316-2317-2318-2319-2320-2321-2322-2323-2324-2325-2326-2327-2328-2329-2330-2331-2332-2333-2334-2335-2336-2337-2338-2339-2340-2341-2342-2343-2344-2345-2346-2347-2348-2349-2350-2351-2352-2353-2354-2355-2356-2357-2358-2359-2360-2361-2362-2363-2364-2365-2366-2367-2368-2369-2370-2371-2372-2373-2374-2375-2376-2377-2378-2379-2380-2381-2382-2383-2384-2385-2386-2387-2388-2389-2390-2391-2392-2393-2394-2395-2396-2397-2398-2399-2400-2401-2402-2403-2404-2405-2406-2407-2408-2409-2410-2411-2412-2413-2414-2415-2416-2417-2418-2419-2420-2421-2422-2423-2424-2425-2426-2427-2428-2429-2430-2431-2432-2433-2434-2435-2436-2437-2438-2439-2440-2441-2442-2443-2444-2445-2446-2447-2448-2449-2450-2451-2452-2453-2454-2455-2456-2457-2458-2459-2460-2461-2462-2463-2464-2465-2466-2467-2468-2469-2470-2471-2472-2473-2474-2475-2476-2477-2478-2479-2480-2481-2482-2483-2484-2485-2486-2487-2488-2489-2490-2491-2492-2493-2494-2495-2496-2497-2498-2499-2500-2501-2502-2503-2504-2505-2506-2507-2508-2509-2510-2511-2512-2513-2514-2515-2516-2517-2518-2519-2520-2521-2522-2523-2524-2525-2526-2527-2528-2529-2530-2531-2532-2533-2534-2535-2536-2537-2538-2539-2540-2541-2542-2543-2544-2545-2546-2547-2548-2549-2550-2551-2552-2553-2554-2555-2556-2557-2558-2559-2560-2561-2562-2563-2564-2565-2566-2567-2568-2569-2570-2571-2572-2573-2574-2575-2576-2577-2578-2579-2580-2581-2582-2583-2584-2585-2586-2587-2588-2589-2590-2591-2592-2593-2594-2595-2596-2597-2598-2599-2600-2601-2602-2603-2604-2605-2606-2607-2608-2609-2610-2611-2612-2613-2614-2615-2616-2617-2618-2619-2620-2621-2622-2623-2624-2625-2626-2627-2628-2629-2630-2631-2632-2633-2634-2635-2636-2637-2638-2639-2640-2641-2642-2643-2644-2645-2646-2647-2648-2649-2650-2651-2652-2653-2654-2655-2656-2657-2658-2659-2660-2661-2662-2663-2664-2665-2666-2667-2668-2669-2670-2671-2672-2673-2674-2675-2676-2677-2678-2679-2680-2681-2682-2683-2684-2685-2686-2687-2688-2689-2690-2691-2692-2693-2694-2695-2696-2697-2698-2699-2700-2701-2702-2703-2704-2705-2706-2707-2708-2709-2710-2711-2712-2713-2714-2715-2716-2717-2718-2719-2720-2721-2722-2723-2724-2725-2726-2727-2728-2729-2730-2731-2732-2733-2734-2735-2736-2737-2738-2739-2740-2741-2742-2743-2744-2745-2746-2747-2748-2749-2750-2751-2752-2753-2754-2755-2756-2757-2758-2759-2760-2761-2762-2763-2764-2765-2766-2767-2768-2769-2770-2771-2772-2773-2774-2775-2776-2777-2778-2779-2780-2781-2782-2783-2784-2785-2786-2787-2788-2789-2790-2791-2792-2793-2794-2795-2796-2797-2798-2799-2800-2801-2802-2803-2804-2805-2806-2807-2808-2809-2810-2811-2812-2813-2814-2815-2816-2817-2818-2819-2820-2821-2822-2823-2824-2825-2826-2827-2828-2829-2830-283

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## Exhibit 5

DETROIT - Published June 23

# Detroit's Craig moves closer to launching GOP run against Michigan's Whitmer

Former police chief says he should have an announcement 'within a few weeks'

By Paul Steinhauser, Andrew Murray | Fox News

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People should be angry it has taken so long to realize defunding the police doesn't work: James Craig

Former Detroit police chief weighs in as critics go long to reform the police on 'Year One' with Rep. Charles

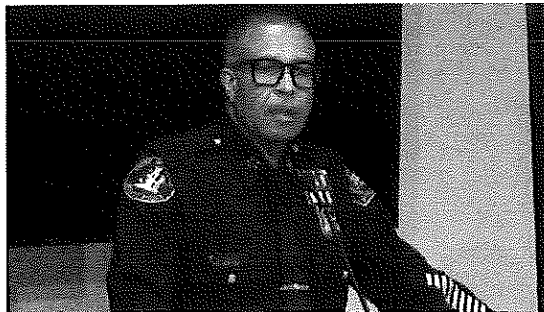
Former Detroit Police Chief James Craig says that "things are moving along at a great pace" when it comes to his potential Republican run for Michigan governor in 2022.

Craig, who retired earlier this month after eight years as police chief for Michigan's largest city and 44 years in law enforcement, said in an interview with Fox News that he's "encouraged" as he continues what he calls "the listening sessions."

## DETROIT'S RETIRING POLICE CHIEF 'NOT RULING OUT' GUBERNATORIAL RUN AGAINST WHITMER

"I continue to be both flattered and humbled about the interest shown to me as a possible candidate for governor," Craig emphasized.

Asked about his timetable to make a decision, Craig said "things are moving along at a great pace. I'm continuing the evaluation. I'm optimistic, hopefully within a few weeks I should be making a statement on the decision."



James Craig announced his retirement after eight years as Detroit's police chief and 44 years in law enforcement.

James confirmed that he's held discussions with the Republican Governors Association (RGA), as well as GOP leaders in Michigan, as he moves closer to launching a bid to try and defeat Democratic Gov. Gretchen Whitmer, who's up for reelection next year.

"I've had conversations with members of the RGA and those conversations are continuing," James said. And he added that he's also in talks with "GOP leaders at the state level."

## GUBERNATORIAL SHOWDOWNS: 38 STATES HOLDING ELECTIONS IN 2021 AND 2022

One person he's yet to directly talk with is former President Trump, who remains extremely popular with Republican voters as he keeps playing a kingmaker's role in GOP primary politics and flirts with another White House run in 2024.

While confirming that he hasn't connected with Trump on the phone, Craig said that "if the president supports me, I'm certainly going to accept it."

Pointing to Trump, Craig said 'I know that the president has made comments about me in the past as a sitting chief of police, relative to how we handled the days and weeks of protests here in Detroit...as I often say, Detroit did not burn. There was no looting.'



Craig, who is Black, started his policing career in Detroit before spending nearly three decades in Los Angeles and serving as police chief in Portland, Maine and Cincinnati, Ohio before returning to the city where he grew up.

As he announced his retirement last month, Craig emphasized that over the past year, amid the nationwide protests that rocked the country over the past year over racial inequity and cases of police brutality against minorities, the Detroit police department 'didn't retreat. The city did not burn and we are a model for the country.'

Asked about the rise in crime across the country over the past year, Craig said that 'police officers are demoralized' and argued that 'the defund (the police) movement has played a role.' And he added that 'I'm unapologetic about for standing up for the vast majority of good and men women who served.'

Craig said he would spotlight the rise in crime if he runs for governor, saying 'certainly that's a big part of who I am. I think what's sorely lacking today... is the absence of leadership.'

But the Democrat turned Republican said 'I'm not going to put myself in a box and be viewed as a one-trick pony, if you will.'

**[CLICK HERE TO GET THE FOX NEWS APP](#)**

If Craig declares his candidacy, he'll join roughly half a dozen Republican candidates who've already launched campaigns.

Political handicappers suggest that Whitmer could face a challenging re-election in Michigan, a perennial battleground where now-President Biden narrowly defeated Trump last November, and Democratic Sen. Gary Peters edged out GOP challenger John James by a razor thin margin.

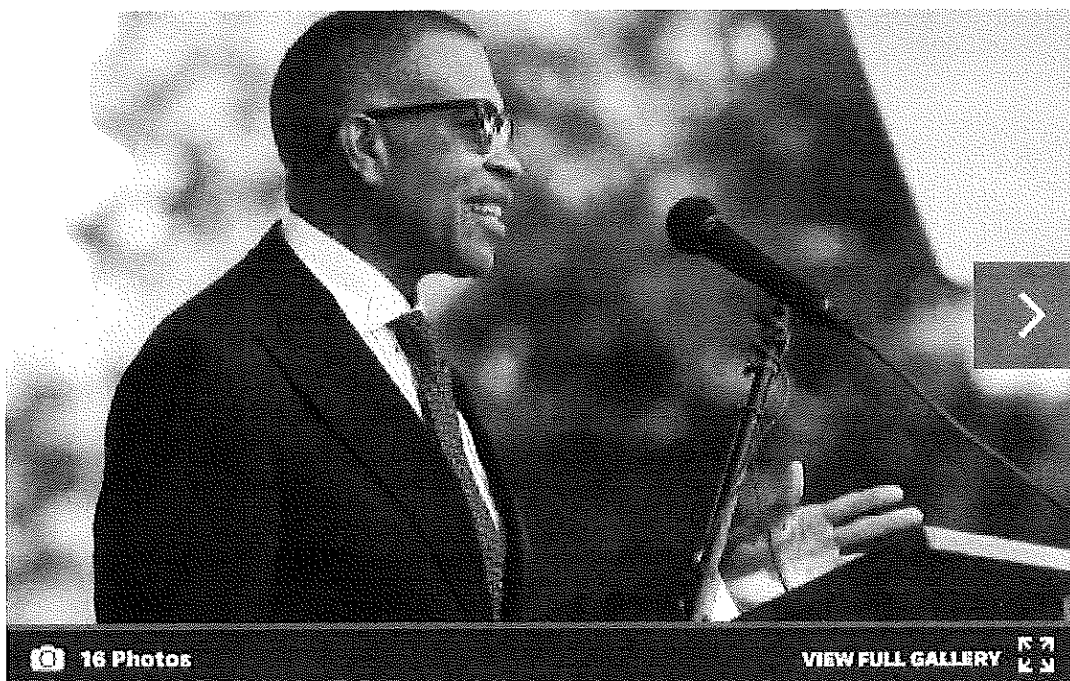
# Exhibit 6

## Ex-chief Craig delivers first political speech, says he voted for Trump

**Beth LeBlanc** The Detroit News

Published 7:58 p.m. ET Jul. 6, 2021 | Updated 9:15 a.m. ET Jul. 7, 2021

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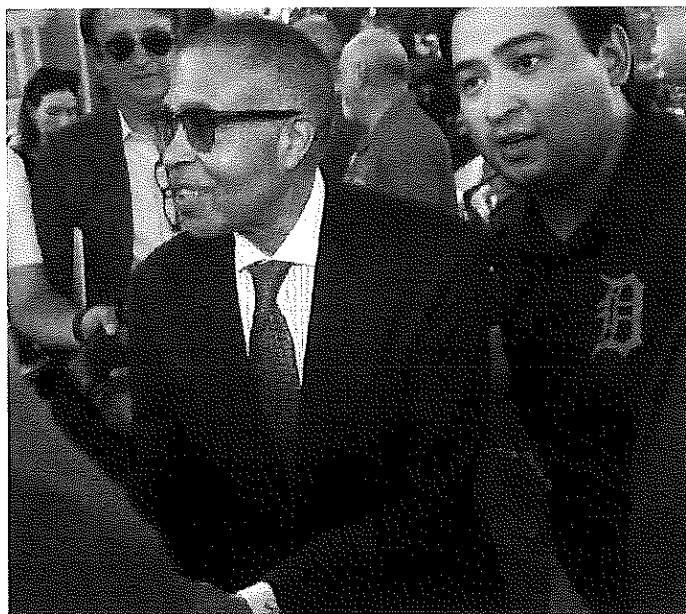
### Former Detroit Police Chief James Craig gives first political speech

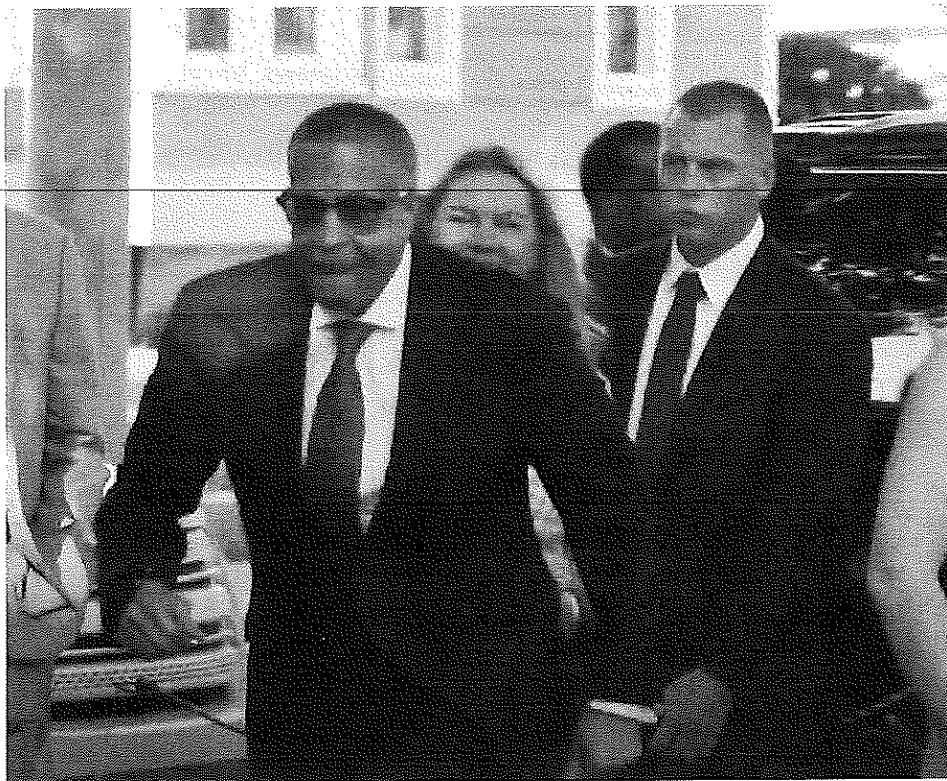
James Craig urged Michigan voters on to declare "independence" from Gov. Gretchen Whitmer in 2022.

*Jackson* — Former Detroit Police Chief James Craig urged Michigan voters on Tuesday to declare "independence" from Gov. Gretchen Whitmer in 2022, but stopped short of announcing his candidacy for governor during his first political speech.

Craig described his migration to the Republican Party and outlined his stances on various GOP touchstones during the roughly 20 minute address, which was preceded and followed by comments from Senate Majority Leaders Mike Shirkey, R-Clarklake, and Michigan Republican Party Chairman Ron Weiser.

## John Yob, Ted Goodman, Additional Staffers

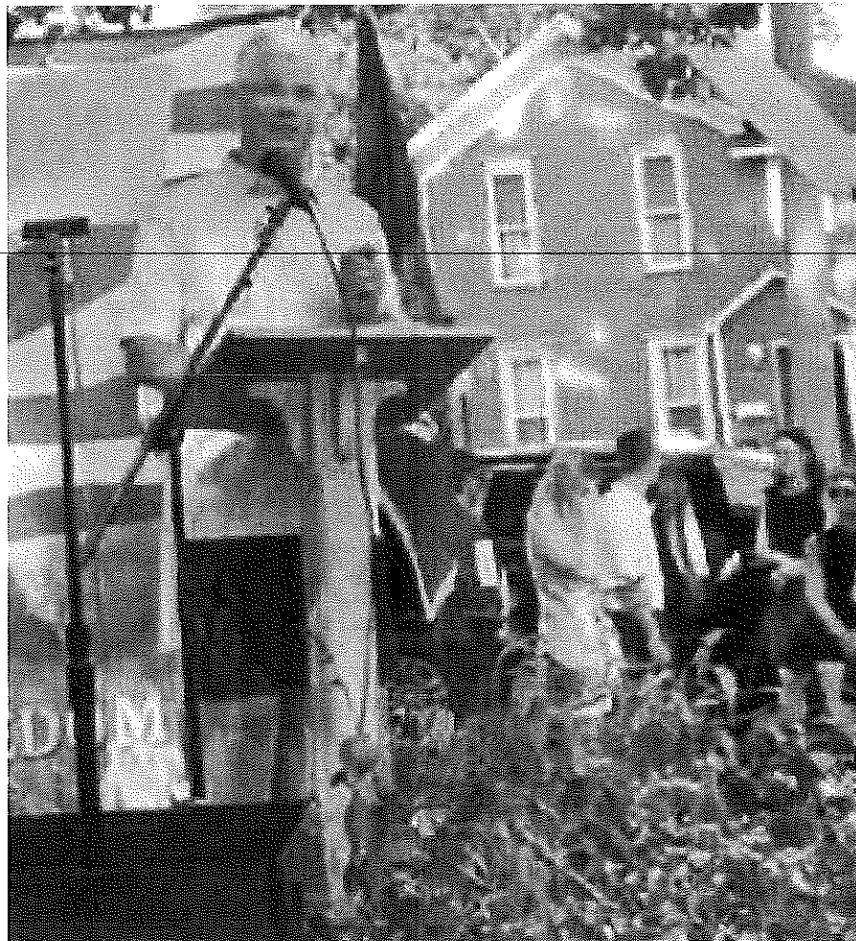






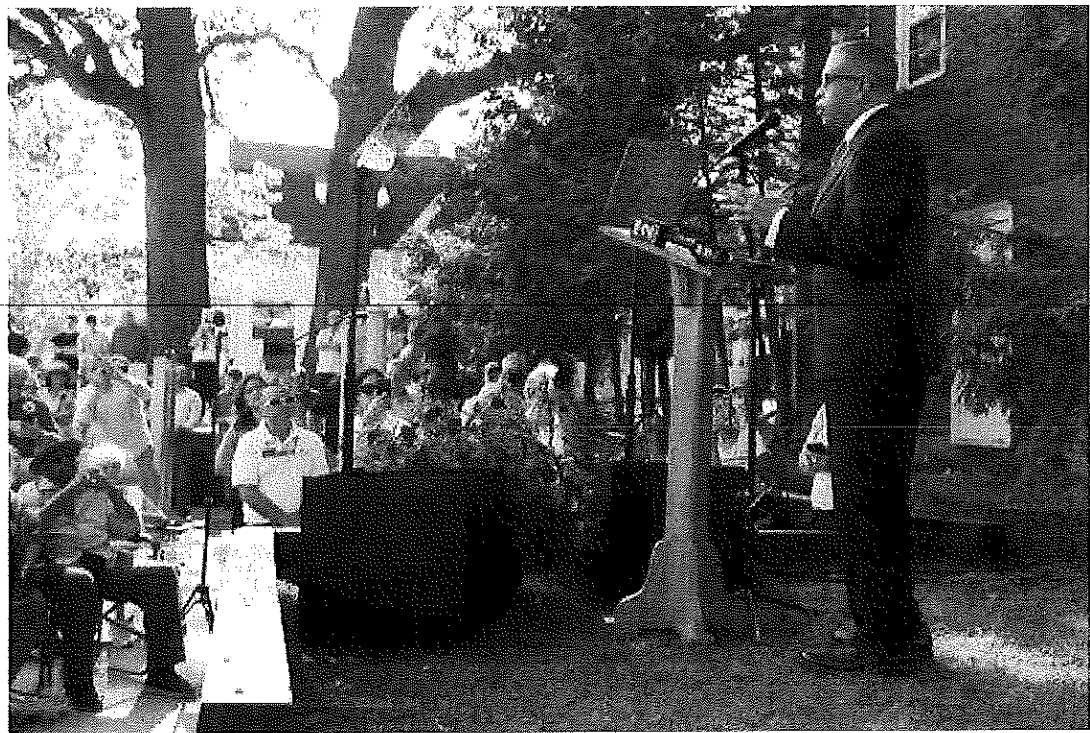


Craig Exiting SUV





Teleprompters at Jackson Speech



# Former Chief Craig, mulling run for governor, filed for personal bankruptcy in 1990s

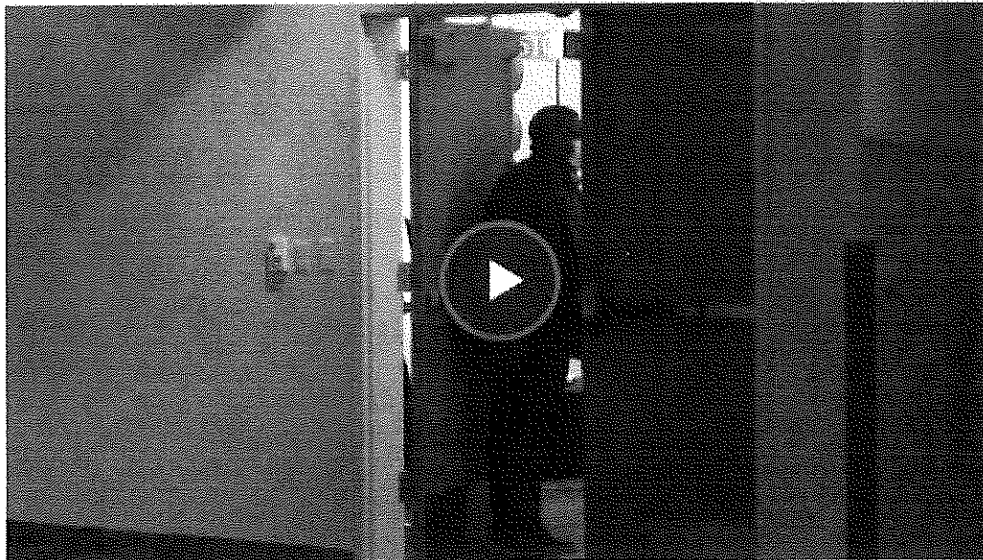
Paul Egan Detroit Free Press

Published 6:26 p.m. ET Jul. 15, 2021 | Updated 6:55 p.m. ET Jul. 15, 2021

[View Comments](#)



## Exhibit 7



*We're always working to  
your experience. Let us know  
you think.*

### Detroit's top cop retiring, says he's a Republican

Detroit police Chief James Craig said he will retire as head of the city's police force, but he did not immediately reveal his future plans, which could include a run for political office as a Republican (May 10) *AP*

AP Photo/Chris Wedel

**LANSING —** A spokesman for recently retired Detroit Police Chief James Craig confirmed Thursday that Craig filed for personal bankruptcy in the late 1990s, but denied that Craig's financial history reflects poorly on him as a candidate for governor.

"As a police officer in Los Angeles, Chief Craig used Chapter 13 to restructure his debt," said Ted Goodman, a political adviser to Craig.

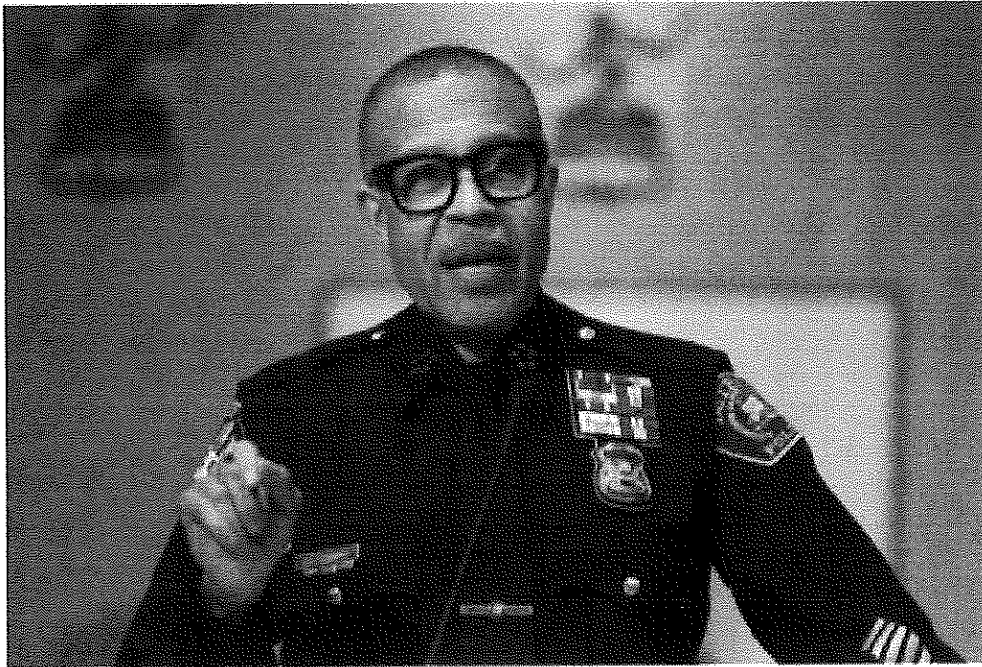
"He paid it off and it was dismissed. Chief Craig has since successfully managed budgets into the hundreds of millions of dollars as chief of police to the city of Detroit."

Deadline Detroit and Metro Times reported Thursday that Craig twice filed for Chapter 13, in 1997 and 1998, while he worked for the Los Angeles Police Department after being laid off as a police officer in his hometown of Detroit.

Craig's creditors included credit card companies, the IRS and the financial institution that held the mortgage on his home, the news outlets reported.

More: James Craig, ex-Detroit police chief, promises important announcement 'next week'

More: How Detroit Police Chief James Craig is impacting the GOP race for



Former Detroit Police Chief James Craig Kirtman F. Dazler, Detroit Free Press

Craig, 64, who retired as Detroit police chief June 1, has been teasing a potential Republican candidacy for governor to challenge Democratic Gov. Gretchen Whitmer in 2022.

On Wednesday, he told Tucker Carlson on Fox News that he expects to make a "major announcement" about Michigan's future on Carlson's show next week. He also recently gave a stump speech at a Republican event in Jackson County.

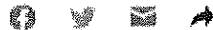
Rodericka Applewhaite, a spokeswoman for the Michigan Democratic Party, declined comment on the Craig bankruptcy.

Goodman said he believed Whitmer's "minions" were behind the story. He said such attacks "will backfire with working class Michiganders."

Contact Paul Egan: 517-372-8660 or [pegan@freepress.com](mailto:pegan@freepress.com). Follow him on Twitter [@paulegan4](https://twitter.com/paulegan4). Read more on Michigan politics and sign up for our elections newsletter.

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JOHN W. INHULSEN  
john@inhulsenlaw.com

September 15, 2021

**Via Electronic Mail (fracassia@michigan.gov)**

Mr. Adam Fracassi  
Bureau of Elections  
Michigan Department of State  
Richard H. Austin Building, 1<sup>st</sup> Floor  
430 West Allegan Street  
Lansing, Michigan 48918

Re: *Timmer v Craig*, Campaign Finance Complaint No. 2021-07-16-24

Dear Mr. Fracasi:

On behalf of Chief James Craig (“Chief Craig”), this correspondence is in response to your letter dated August 3, 2021 notifying Chief Craig that a campaign finance complaint had been filed with your office by an individual named Jeff Timmer (“Timmer”), and of Chief Craig’s right to respond to the allegations before the Department proceeds further. Your letter makes clear that “the Department is neither making this complaint nor accepting the allegations as true.”

As this Department is aware, Chief Craig formed his Candidate Committee, and filed his Statement of Organization, on July 21, 2021, being the “Chief James Craig for Governor Exploratory Committee”, in compliance with the MCFA. It was amended on September 14, 2021 to the “Chief James Craig for Governor” Committee. ~~Prior to July 21, 2021, Chief Craig was a private citizen. Private citizens are allowed to give speeches and volunteer their time to assist others in legal endeavors.~~

We have reviewed Timmer’s complaint and find it to be without merit or any evidence to support his claims. It is replete with speculation and conjecture. In fact, he literally asks your Department to conduct a “compliance investigation” to determine *if there is* evidence to support his claims – an admission that he has no evidence, and was not aware of any evidence, at the time of his filing.

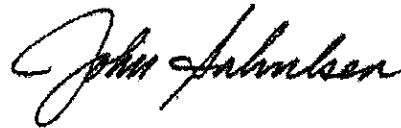
The Michigan Campaign Finance Act (“MCFA”) seeks to curtail this exact type of frivolous complaint through its certification requirements, being MCL 169.215(6)(c), and subjects violators to a civil violation of the MCFA and a fine of up to \$1,000 and expenses incurred by the Department as a result of the complaint. MCL 169.215(8).

Timmer chose to certify his complaint with the certification option affirming that he had evidence of such violations, more specifically it stated – *“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 complain is supported by evidence.”* (see Timmer Complaint). As stated above, his complaint specifically indicates that he does not have any evidence, and asks the Department to, essentially, go develop some.

Timmer violated the MCFA certification rule and should be subject to a civil violation, fine, and all expenses incurred by the Department, so that Michigan taxpayers aren't paying for his political frivolity and attention seeking. Please consider this Chief Craig's complaint against Timmer for the same.

We trust this information is helpful. Please do not hesitate to contact me directly if you have any further questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "John Inhulsen", written in a cursive style.

John W. Inhulsen

---

**From:** Jeff Timmer <jeff@tworiverspublicaffairs.com>  
**Sent:** Monday, July 19, 2021 3:21 PM  
**To:** SOS, Disclosure  
**Subject:** Campaign Finance Complaint RE: James Craig  
**Attachments:** Timmer Complaint 071921.pdf; Timmer Complaint - Exhibit 1 (1).pdf; Timmer Complaint - Exhibit 2 (1).pdf; Timmer Complaint - Exhibit 3 (1).pdf; Timmer Complaint - Exhibit 4 (1).pdf; Timmer Complaint - Exhibit 5 (1).pdf; Timmer Complaint - Exhibit 6 (1).pdf; Timmer Complaint - Exhibit 7 (1).pdf

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**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

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Please see the attached campaign finance complaint and substantiating exhibits.

Jeff Timmer  
517-203-8001

December 16, 2021

Adam Fracassi  
Michigan Bureau of Elections  
Richard H. Austin Building  
430 West Allegan Street, 1st Floor  
Lansing, Michigan 48918

**Re: Campaign Finance Complaint No. 2021-07-16-24**

Dear Mr. Fracassi:

This letter serves as my rebuttal statement to James Craig's response to my above-referenced Campaign Finance Complaint.

In his Response, Craig does not deny any of the allegations raised against him in my Complaint. The allegations are straightforward and supported by evidence, including news articles.<sup>1</sup> Craig's contention that there is no evidence is simply untrue. Craig's lack of candor and refusal to address these straightforward allegations alone provides a reasonable basis to believe that Craig has violated Section 24 of the Michigan Campaign Finance Act (MCFA). As part of this process, Craig should answer the allegations in the affirmative or negative. His failure to do so is deceit by omission.

Craig's attempt to avoid further investigation by invoking the Rules of Evidence relating to hearsay is also Machiavellian. The Rules of Evidence do not apply in this proceeding. *See e.g., Becker-Witt v. Bd. of Examiners of Social Workers*, 256 Mich. App. 359, 365; 663 N.W.2d 514 (2003) (the admissibility of evidence in an administrative hearing is governed not by the Michigan Rules of Evidence). Whether the evidence submitted in support of my Complaint is hearsay or not, it is admissible for consideration by the Bureau of Elections (BOE) for purposes of determining whether Craig has violated the MCFA. Notably, again, Craig does not dispute the allegations he claims are hearsay, but instead tries to avoid answering based on an evidentiary technicality that is not applicable.

Craig entirely ignores that the complainant's burden at this stage is minimal. It is not the complainant's burden to prove the case, so to speak. In fact, the preponderance of the evidence standard does not even apply to this proceeding. This is an administrative complaint procedure that requires reasonably informed notice to the BOE.<sup>2</sup> The MCFA merely requires that a complainant make a "reasonable inquiry under the circumstances" to determine whether the factual

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<sup>1</sup> Notably, the BOE contemplates news articles as evidence in Section 3 of its Guidebook for Complaints and Respondents on the Campaign Finance Complaint Process available at: [https://www.michigan.gov/documents/sos/Complaint\\_Guidebook\\_Procedures\\_660411\\_7.pdf](https://www.michigan.gov/documents/sos/Complaint_Guidebook_Procedures_660411_7.pdf)

<sup>2</sup> Even at a hearing, the BOE need only show the findings "are supported by competent, material, and substantial evidence on the whole record." *Boyd v. Civil Service Comm.*, 220 Mich. App. 226, 232, 559 N.W.2d 342 (1996) (quotation marks and citation omitted); Const 1963, art 6, § 28.

allegations are supported by evidence or “are likely to be supported by evidence after a reasonable opportunity for further inquiry.” *See* MCL 169.215(6). And, contrary to Craig’s assertion, it is the Secretary of State’s duty to investigate the allegations and determine “whether there may be reason to believe that a violation...has occurred.” *See* MCL 169.215(9), (10). This may be substantially less than “substantial evidence” or a “preponderance of the evidence.” Craig’s assertion that asking the BOE to investigate is somehow a misuse of taxpayer dollars ignores the fundamental purpose of the complaint procedure and the BOE’s role in ensuring fair application and enforcement of the MCFA.

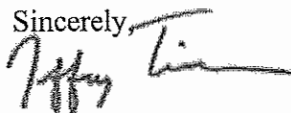
Finally, I have learned of additional facts and information supporting my original Complaint:

- 1) Crain’s Detroit Business recently reported that John Yob and his political consulting firm Strategic National LLC had been “working with Craig since at least early summer to stand up a gubernatorial campaign.” (Ex. 1). MIRS also reported that “Republican campaign strategist John Yob is out as the general consultant for the James Craig gubernatorial campaign after advising the former Detroit police chief since the spring due to an announced difference of direction.” (Ex. 2). This confirms Craig hired Yob and his firm prior to July 11, 2021.
- 2) Craig’s campaign’s Twitter account, which was established in June 2021, tweeted several links containing campaign logos on July 21, 2021. The logo matches the website design that was published on the same day. (Ex. 3). As a result, Craig had to have hired a graphic designer and/or other consultants regarding the logo and campaign marketing materials, making significant campaign expenditures, prior to the 10-day threshold.

Based on the above-referenced facts and the applicable law, Craig failed to register ~~candidate committee within ten (10) days of him first receiving a contribution or making an expenditure in violation of MCL 169.224(1).~~

By signing below, I certify to the best of my knowledge, information, and belief, formed after a reasonable inquiry under the circumstances, each factual contention set forth above is supported by evidence.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Timmer", written over a horizontal line.

Jeff Timmer





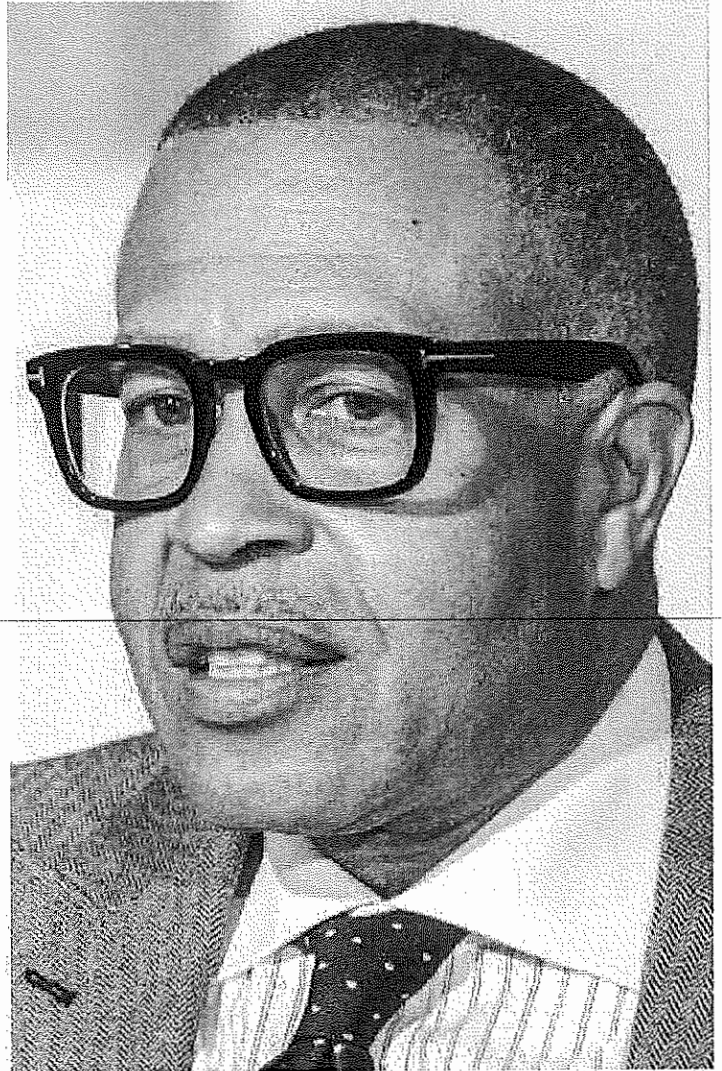
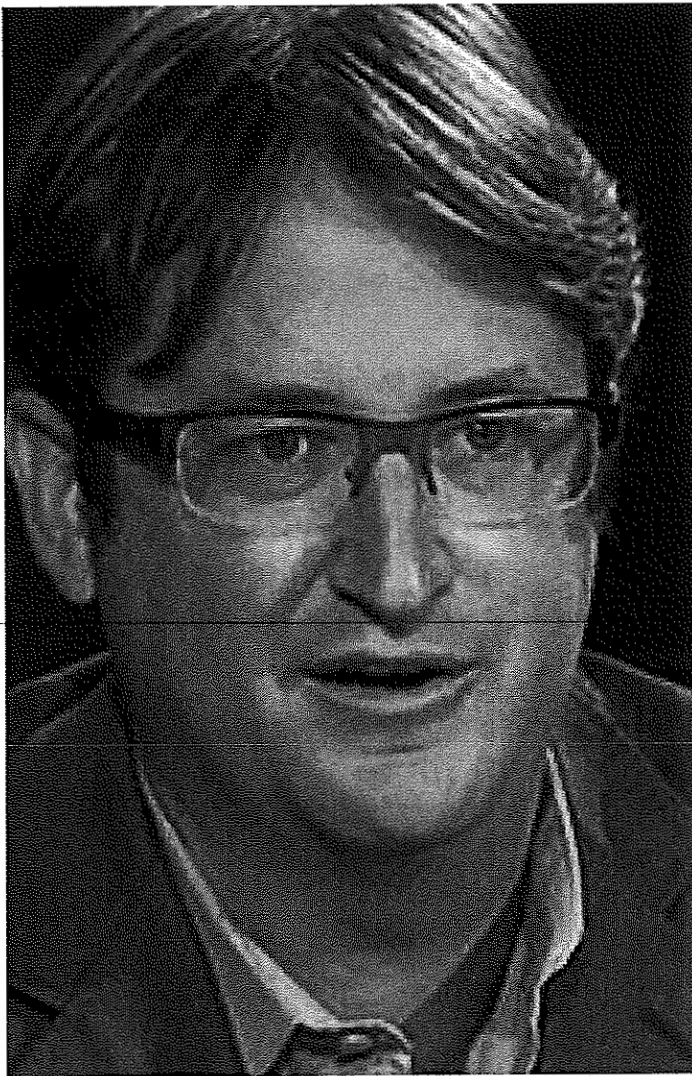
# CRAIN'S DETROIT BUSINESS

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November 26, 2021 07:13 AM

## GOP consultant Yob quits Craig's campaign for governor

CHAD LIVENGOOD  



WKAR-TV and Flickr

Republican strategist John Yob (left), owner of Strategic National LLC in Grand Rapids, has quit the gubernatorial campaign of former Detroit police chief James Craig (right).

Prominent Republican political strategist John Yob has quit former Detroit police chief James Craig's campaign for governor, citing a disagreement on the direction Craig wanted to take in

pursuing the governor's office.

Yob and his Grand Rapids-based political consulting firm Strategic National LLC had been working with Craig since at least early summer to stand up a gubernatorial campaign.

"The chief has every right to run the non-traditional campaign that he wants to run and thinks will be successful," Yob said in a statement. "... I didn't agree with the direction that he wanted to go in the future and therefore it made sense to step aside and allow him the space to build a team that is willing to strategize and implement his vision for the campaign."

The shakeup in Craig's campaign came days after metro Detroit businessman Kevin Rinke entered the crowded Republican primary field, vowing to spend \$10 million of his personal fortune to win the nomination to take on incumbent Democratic Gov. Gretchen Whitmer.

The dozen GOP gubernatorial hopefuls include conservative radio host Tudor Dixon, Michigan State Police Capt. Michael Brown, Kalamazoo chiropractor and COVID lockdown critic Garrett Soldano and Ryan Kelley, a township planning commissioner from Ottawa County.

Through Oct. 20, the Craig campaign had paid Yob's Strategic National firm \$51,324.49 for campaign consulting and organizing services, according to campaign finance records.

Craig raised \$1.4 million for his campaign in a three-month period that ended Oct. 20, finance records show.

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In September, the launch of Craig's gubernatorial campaign was filled with the kind of buzz that Yob is known within state and national politics of being able to generate.

The retired police chief's Sept. 14 campaign kickoff event at Belle Isle was disrupted by protesters, generating news coverage that got Craig on Fox News host Tucker Carlson's show that night.

Craig later changed locations for his campaign kickoff, giving a rooftop speech at the former UAW-GM Center for Human Resources building along the Detroit riverfront.

But since that kickoff and his appearance at the Republican Party's Mackinac leadership conference in late September, Craig's campaigning for governor has been relatively quiet.

Ted Goodman, a spokesman for Craig's campaign, offered no reason as to why Yob had quit.

"We thank John for his help in getting us to this point in the campaign and wish him nothing but the best," Goodman said in a statement.

Inline Play

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**Source URL:** <https://www.crainsdetroit.com/politics/republican-consultant-john-yob-quits-james-craigs-campaign-michigan-governor>

## Yob Out As Craig's General Consultant

Republican campaign strategist John YOB is out as the general consultant for the James CRAIG gubernatorial campaign after advising the former Detroit police chief since the spring due to an announced difference of direction.

In a statement issued this evening, Yob wrote: "The Chief has every right to run the non-traditional campaign that he wants to run and thinks will be successful. I am proud of helping him achieve historic results in primary polling, general election polling, Mackinac and online fundraising.

"I didn't agree with the direction that he wanted to go in the future and therefore it made sense to step aside and allow him the space to build a team that is willing to strategize and implement his vision for the campaign. I wish him nothing but the best as the intensity of the primary competition increases in the election year."

Yob, who helped lead the campaign of former Gov. Rick SNYDER to victory in 2012, was involved in Lt. Gov. Brian CALLEY's gubernatorial run and Sandy PENSLEY's U.S. Senate run in 2018. MIRS has learned there was no ill will between Yob and Craig. Yob, the CEO of Strategic National, remains friendly with the campaign team, having long-standing relationships with numerous senior campaign staff.

No other staff changes were announced today for the Craig campaign. Anthony SARROS, who was a political director for a gubernatorial candidate in Illinois, remains the campaign's campaign manager. Adam WRIGHT, most recently Sen. Jon BUMSTEAD's chief of staff, is the political director. Ted GOODMAN, the former spokesperson for the Michigan Republican Party, is the communications director. Templar Baker, the firm run by former Republican Party Chair Bobby SCHOSTAK, is leading the fundraising operation.

"We thank John for his help in getting us to this point in the campaign. We wish him nothing but the best. The momentum remains behind Chief James Craig as more and more Michiganders hear his message of solving problems and leading from the front," Goodman said.

Yob's departure comes two months after Craig walked off Mackinac Island as the winner of the Republican Leadership Conference straw poll with 58% support from the conference's 740 conference attendees. Since the event, Craig has stayed mostly quiet outside of an occasional appearance on Fox News.

The news also comes a day after Kevin RINKE announced his candidacy for governor with a \$226,000 advertising buy. Rinke has pledged to spend \$10 million of his own money on a campaign. Craig's campaign raised \$1.425 million in its first reporting period and ended with \$966,873 in cash on hand.

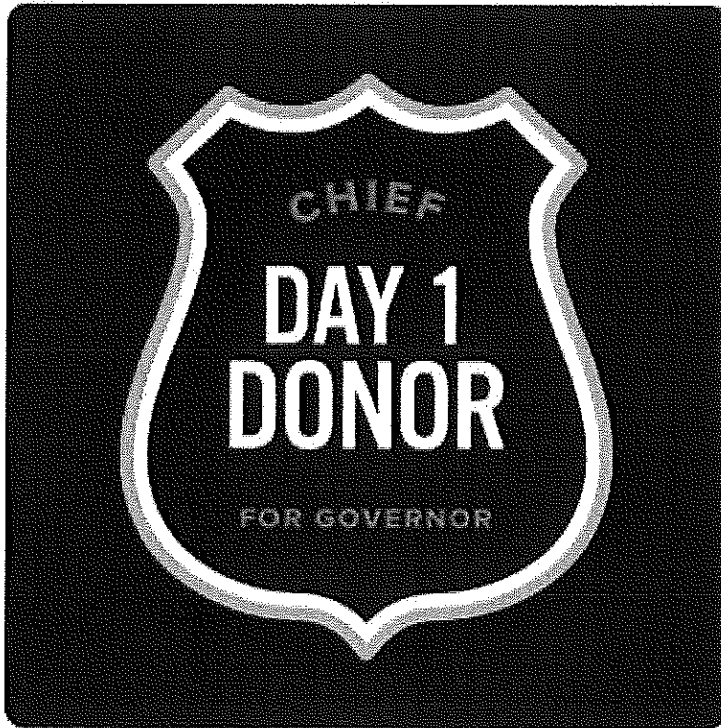
Yob didn't say in his statement if he would work for another gubernatorial campaign at some point. Yob worked for four presidential campaigns at various points in 2012 (Jon HUNTSMAN, Herman CAIN, Newt GINGRICH and Rick SANTORUM). In those cases, Yob hung around the campaign until the candidate had dropped out or was close to doing so before shifting to another candidate.



Chief James Craig @chiefjamescraig · Jul 21

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Join today to earn a badge and be on our team from Day 1!  
ChiefJamesCraig.com



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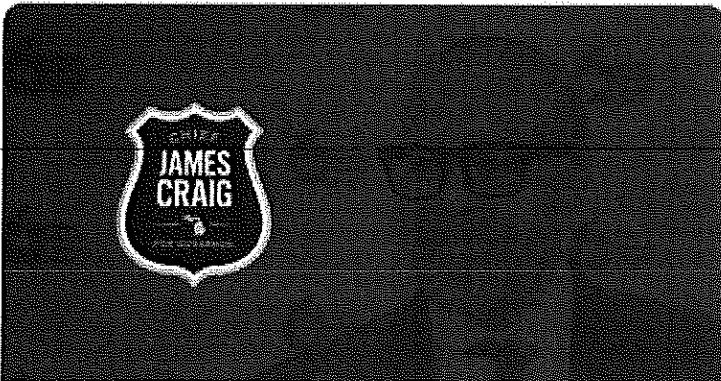
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Chief James Craig @chiefjamescraig · Jul 21

...

Today's announcement video: Leading From the Front can be viewed on our website



chiefjamescraig.com

Chief James Craig for Governor

Chief James Craig has the knowledge, experience, and vision to lead from the front as Michigan's next governor.



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

April 25, 2022

John W. Inhulsen  
Attorney for James Craig  
Inhulsen Law  
3351 Claystone St. SE, Suite 104  
Grand Rapids, MI

Re: *Craig v. Timmer*  
Campaign Finance Complaint No. 2021-07-16-224

Dear Mr. Inhulsen:

The Department of State (Department) has finished investigating the campaign finance complaint filed against your client James Craig by Jeff Timmer alleging violations of the Michigan Campaign Finance Act (MCFA). This letter concerns the disposition of that complaint.

The complaint alleges that Mr. Craig violated the MCFA by failing to create a candidate committee after Mr. Craig became a candidate for governor. Specifically, the complaint claims that Mr. Craig had not filed a statement of organization prior to appearances on the Fox News Channel and the Fox Business Channel, and that those appearances were intended to further Mr. Craig's election. The complaint also alleges that Mr. Craig began working with a John Yob, a political consultant, more than a month prior to filing his statement of organization. The complaint included a number of news articles and photos to substantiate its factual claims.

Acting as Mr. Craig's attorney, you responded to the complaint. In that response, you state that Mr. Craig filed the statement of organization for his candidate committee on July 21, 2021, and you argue that Mr. Craig's television appearances were undertaken in Mr. Craig's personal capacity before he became a candidate.

Mr. Timmer submitted a rebuttal statement, which reiterated the arguments in the complaint and argues that hearsay is admissible in administrative procedures in Michigan. The rebuttal also contains three news articles purporting to show that Mr. Craig made expenditures on his campaign prior to July 11, 2021.

In Michigan, a person becomes a candidate for the purposes of the MCFA when they “receive[] a contribution, make[] an expenditure, or give[] consent for another person to receive a contribution or make an expenditure with a view to bringing about the individual’s nomination or election to an elective office.”<sup>1</sup> MCL 169.203(1)(c). The words “contribution” and “expenditure” are terms of art that are generally defined to include a payment or transfer of anything of ascertainable monetary value made for the purpose of influencing or made in assistance of the qualification, passage, or defeat of a ballot question. MCL 169.204(1), 169.206(1). Within 10 days of becoming a candidate, the candidate must form a candidate committee. MCL 169.221(1). Within 10 days of its formation, that candidate committee must file a statement of organization. MCL 169.224(1). In other words, a candidate must file a statement of organization within 20 days of receiving a contribution, making an expenditure, or allowing a third party to receive a contribution or make an expenditure on their behalf.

The Department has reviewed the evidence submitted in this matter and concludes that insufficient evidence has been submitted to support a finding that a potential violation of the MCFA has occurred. While Mr. Craig may have formed the intent to run for office prior to July 17, intent to become a candidate does not trigger the requirements of the MCFA. The complaint does not allege specific contributions received by Mr. Craig or expenditures made by Mr. Craig to further his election more than twenty days prior to the statement of organization being filed.<sup>2</sup> The only specific expenses incurred by Mr. Craig referenced in the complaint are the cost of Mr. Craig appearing on television programs and the potential “hiring” of Mr. Yob by Mr. Craig. The costs that Mr. Craig incurred by appearing on television are not explained in sufficient detail for the Department to conclude that the costs were expenditures for the purposes of the MCFA. Specifically, the complaint does not argue that Mr. Craig purchased an internet connection in order to appear on television, nor that appearing on television in any way increased the cost of Mr. Craig’s internet services beyond what he would have paid if he had not appeared on television. The complaint further fails to specify if Mr. Craig used a paid video conference platform to appear on television, or to specify that Mr. Craig, and not the television station, paid for that platform.

Likewise, though Mr. Timmer’s rebuttal states that the attached news articles show that Mr. Craig had “hired” Mr. Yob prior to July 11, 2021, the news article in question only states that “Yob and his Grand Rapids-based political consulting firm Strategic National LLC had been working with Craig since at least the early summer to stand up a gubernatorial campaign.” While “working with” may imply that Mr. Craig paid Mr. Yob, it can also imply that Mr. Yob was working on a volunteer basis, or merely that Mr. Yob and Mr. Craig were having conversations

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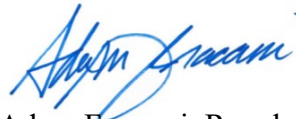
<sup>1</sup> A person may become a candidate in other ways, but none of those paths to candidacy are relevant to this determination and thus are not discussed. MCL 169.203(1).

<sup>2</sup> The complaint includes photos allegedly showing Mr. Craig appearing with staffers at a speech he gave on July 6. Because the statement of organization was filed fewer than 20 days after that speech, even if the speech was made solely for the purposes of furthering Mr. Craig’s nomination, and even if funds were spent on the speech or preparation for that speech, the expenditures would not conflict with the MCFA so long as they were properly reported. Because the complaint does not allege a failure to properly report expenditures, the Department does not make a determination on the sufficiency of Mr. Craig’s candidate committee’s campaign statements.

about a potential election campaign without any work being done by Mr. Yob. Beyond the allegations relating to television appearances and Mr. Yob's employment, the complaint includes a number of articles showing that Mr. Craig prepared to be a candidate prior to filing his statement of organization on July 17, but no articles claiming that Mr. Craig made any expenditures or received any contributions prior to July 17.

Because the violation of the MCFA alleged in the complaint has not been substantiated by sufficient evidence, the Department dismisses the complaint and will take no further enforcement action.

Sincerely,

A handwritten signature in blue ink, appearing to read "Adam Fracassi", is positioned above the typed name.

Adam Fracassi, Regulatory Manager  
Bureau of Elections  
Michigan Department of State

C: Jeff Timmer, via email