

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Beau Taylor for Troy School Board — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party ("OCR" or "Complainant") submits this complaint pursuant to the Michigan Campaign Finance Act ("MCFA"), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including yard signs and the campaign website.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrikmi@gmail.com

2. Respondent Information

Candidate: Beau Taylor

Committee: BEAU TAYLOR FOR TROY SCHOOL BOARD

Office Sought: Member, Troy School District Board of Education

Committee/Candidate Contact (from campaign website): Beau@beaufortroyschools.com; (517) 315-6522

Campaign Website: www.beaufortroyschools.com

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that "[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question" bear "an identification" that includes "the name and address of the person paying for the matter." Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, "Paid for by [Committee Name], [Address]." The identification must be

clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

4. Statement of Facts

A. Campaign Yard Signs (Exhibit A)

Complainant observed and photographed campaign yard signs for respondent displayed in Troy, Michigan (photograph attached as Exhibit A). Each sign displays the candidate's name ("BEAU TAYLOR"), the office sought ("for TROY SCHOOL BOARD"), and the campaign website address (www.beaufortroyschools.com). No portion of either sign — front, back, or border — contains a "Paid for by" disclaimer or any other identification of the person or committee paying for the sign, as required by MCL 169.247(1). The signs are of ordinary campaign yard-sign size and do not fall within any rule exempting small items (such as buttons or balloons) from the disclaimer requirement.

B. Campaign Website (Exhibit B)

Complainant also reviewed respondent's campaign website, www.beaufortroyschools.com, including the site footer and contact page (screenshot attached as Exhibit B). The footer identifies the site as belonging to "Beau Taylor for Troy School Board," includes a copyright notice, contact information, social media links, and links to a Privacy Policy and Terms of Service — but no "Paid for by" disclaimer or other funding-source identification appears anywhere on the page reviewed. Complainant requests that the Bureau review the site in full to confirm whether a compliant disclaimer appears elsewhere on the site and, if not, treat this as an additional instance of noncompliance.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's yard signs and website violate MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (yard sign photograph); Exhibit B (website screenshot)

EXHIBIT A

Photograph of Beau Taylor for Troy School Board yard signs, no disclaimer visible



EXHIBIT B

Screenshot of beaufortroyschools.com footer/contact section, no disclaimer visible

The screenshot shows a web browser window with the address bar displaying "beaufortroyschools.com". The page features a contact form with a "Subject" field containing the placeholder text "How can we help?", a "Message" field with the placeholder text "Share your thoughts with us...", and a red "Send Message" button. Below the form is a horizontal navigation bar with links: "ROY MI • OAKLAND COUNTY ENHANCEMENT MILLAGE • CHOOSING TROY ON PURPOSE • BEAU TAYLOR". The footer is divided into three columns. The first column contains the "Beau Taylor" logo and the tagline "Listening, Learning, Delivering for our Kids". The second column, titled "Contact", lists the email "Beau@beaufortroyschools.com" and the phone number "(517) 315-6522". The third column, titled "Follow Us", displays social media icons for Facebook, Instagram, YouTube, Twitter, LinkedIn, and Spotify. At the bottom of the page, the copyright notice "© 2026 Beau Taylor for Troy School Board. All rights reserved." is on the left, and "Privacy Policy | Terms of Service" is on the right.

Subject *

How can we help?

Message *

Share your thoughts with us...

Send Message

ROY MI • OAKLAND COUNTY ENHANCEMENT MILLAGE • CHOOSING TROY ON PURPOSE • BEAU TAYLOR

Beau Taylor
Listening, Learning, Delivering for our Kids

Contact
Beau@beaufortroyschools.com
(517) 315-6522

Follow Us

Facebook, Instagram, YouTube, Twitter, LinkedIn, Spotify

© 2026 Beau Taylor for Troy School Board. All rights reserved. Privacy Policy | Terms of Service

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Zach Abbott — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Zach Abbott

Committee: Committee to Elect Zach Abbott

Office Sought: State Representative, District 79

Campaign/Donation Page(s) Reviewed: zachabbottformi.runtogether.us;
<https://secure.actblue.com/donate/zach-abbott-mi79> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the website located at zachabbottformi.runtogether.us for Zach Abbott, a candidate for State Representative in Michigan's 79th District. A banner across the top of the page states: "Join Zach Abbott's campaign for State Representative in Michigan's 79th District. Committed to affordable housing, workforce training, healthcare reform, and clean energy for a healthier, more inclusive Michigan." Further down the page, bolded text states: "Join Zach in shaping a Michigan where everyone can thrive. Volunteer, donate, or simply spread the word. Together, we can make it happen." directly above "GET INVOLVED" and "DONATE" buttons soliciting support and contributions. The footer displays a stylized campaign logo reading "Zach ABBOTT for STATE REPRESENTATIVE" beside a star graphic, combining the candidate's name and the office sought.

Immediately below that logo, in a dark blue bar spanning the width of the page, the site displays the statement: "Paid for by the Committee to Elect Zach Abbott." This statement names a committee but includes no street address, post office box, city, state, or zip code, either within that block or anywhere else on the page as reviewed. Because the statement omits any address, it does not satisfy MCL 169.247(1)'s requirement that the committee's identification include the committee's address as part of a single, self-contained disclosure.

B. ActBlue Donation Page (Exhibit B)

On or about Monday, August 31, 2026, Complainant's designee accessed the linked ActBlue donation page at <https://secure.actblue.com/donate/zach-abbott-mi79>, captioned "Zach Abbott — Donate via ActBlue." The page is headed "Support Zach Abbott for State Rep" and states "Your contribution will benefit Zach Abbott," soliciting donations in specified amounts (\$5, \$10, \$20.26, \$50, \$100, \$200, \$500, or a custom amount) via "Pay with card," Apple Pay, or Google Pay.

The only disclaimer-type text appearing anywhere on the donation page is ActBlue's own standard platform notice, set off in a bordered box near the bottom of the page: "Platform paid for by ActBlue

(actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee." No committee-specific "Paid for by [Committee], [Address]" statement for Zach Abbott's committee appears anywhere on the donation page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

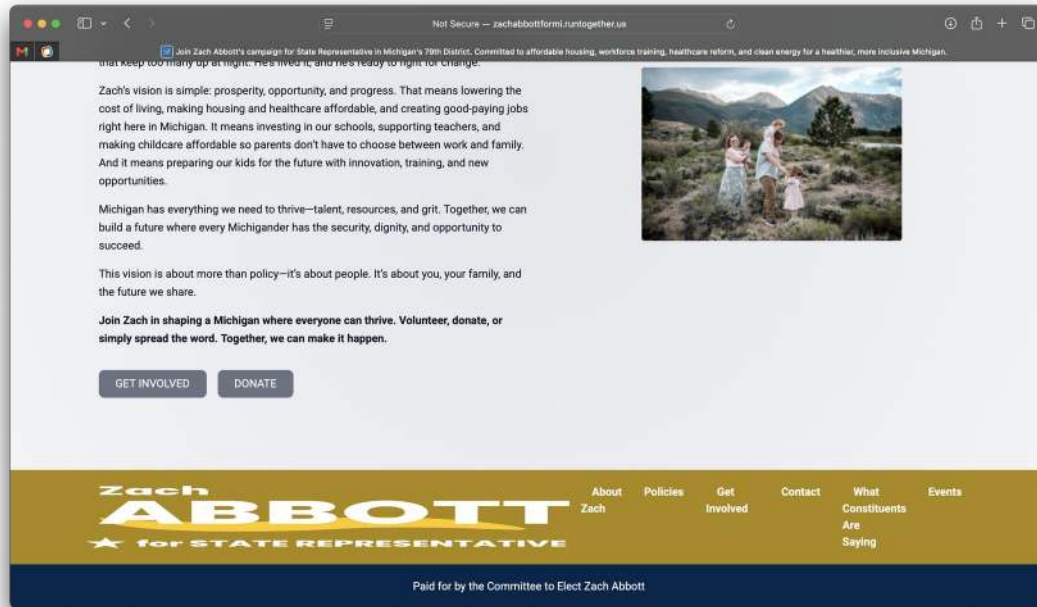
Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (campaign website screenshot); Exhibit B (ActBlue donation page screenshots)

EXHIBIT A

Screenshot of the zachabbottformi.runtogether.us campaign website, captured on or about August 31, 2026



Campaign website footer, showing the 'Zach ABBOTT for STATE REPRESENTATIVE' logo and the statement 'Paid for by the Committee to Elect Zach Abbott' with no accompanying address

EXHIBIT B

Screenshots of the secure.actblue.com donation page for Zach Abbott, captured on or about August 31, 2026

This screenshot shows the upper portion of the donation page. On the left, under the heading "Support Zach Abbott for State Rep", there is a paragraph about Zach's campaign. On the right, the "Choose an amount:" section offers preset donation amounts (\$5, \$10, \$20.26, \$50, \$100, \$200, \$500) and a custom amount field. Below this, the "Make it monthly!" section has two buttons: "Yes, count me in!" and "No, donate once" (which is selected). The "Checkout" section includes a link to sign in for an Express account and three payment options: "Pay with card", "Apple Pay", and "Donate with Google Pay". A "Secured by ActBlue" badge is in the top right corner.

Upper portion of donation page

This screenshot shows the lower portion of the donation page. It features the same "Checkout" section with payment options as the upper portion. Below the payment options, the "Contribution rules" are listed in four numbered points. A note states that Americans living abroad may only contribute through ActBlue while physically in the United States. At the bottom, a disclaimer states that the platform is paid for by ActBlue and is not authorized by any candidate or committee, and that contributions are not deductible for federal income tax purposes.

Lower portion of donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Jalal Abdallah — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrikmi@gmail.com

2. Respondent Information

Candidate: Jalal Abdallah

Committee: Not identified by name in the material reviewed

Office Sought: State Representative, District 15

Campaign/Donation Page(s) Reviewed: votejalal.com; <https://secure.actblue.com/donate/jalal> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate’s name with campaign branding — typically a logo or banner pairing the candidate’s name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate’s campaign. Material of that character is express advocacy for the candidate’s election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247’s reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Saturday, August 29, 2026, Complainant’s designee accessed the donation page hosted at <https://secure.actblue.com/donate/jalal> soliciting contributions to “Jalal Abdallah for State Rep.” The page displays the candidate’s name and campaign branding, states “Support Jalal Abdallah for State Representative,” and notes “Your contribution will benefit Jalal Abdallah” — but at no point names a campaign committee, and no address of any kind appears in this section. This campaign branding and the page’s express directive to “Support Jalal Abdallah for State Representative” constitute express advocacy for his election under *Golden v. Yahkind*, bringing the page within MCL 169.247’s disclosure requirement.

The only funding-source disclosure on the page appears in a footer box stating that the platform itself is “Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” This generic ActBlue notice names the platform, not the candidate’s committee, and does not include any “Paid for by” statement identifying Jalal Abdallah’s committee or an address for it.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent’s campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

Enclosures: Exhibit A (donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Jalal Abdallah, captured on or about August 29, 2026

The screenshot shows the top portion of a web browser window. The address bar displays 'secure.actblue.com'. The page title is 'Jalal Abdallah — Donate via ActBlue'. A security notice in the top right corner states 'Secured by ActBlue'. The main heading is 'JALAL ABDALLAH FOR STATE REP' with a blue outline of Michigan to the right. Below this, the text reads 'Support Jalal Abdallah for State Representative'. A paragraph follows: 'Jalal is running to make state government work better for the people of Dearborn and Dearborn Heights. Your support helps us drive our mission forward to represent your voice in Lansing.' To the right, under 'Choose an amount:', it says 'Your contribution will benefit Jalal Abdallah.' There are buttons for '\$100', '\$250', '\$500', '\$750', and '\$1,225', along with a custom amount input field. Below that, the 'Make it monthly!' section includes a text box and two buttons: 'Yes, count me in!' and 'No, donate once' (which is selected). The 'Checkout' section is partially visible at the bottom.

Donation page header — candidate branding and donation form, no disclaimer visible

The screenshot shows the bottom portion of the web browser window. The 'Checkout' section is prominent, featuring a link 'Have an ActBlue Express account? Sign in to give faster.' and three payment buttons: 'Pay with card', 'Apple Pay', and 'Donate with Google Pay'. Below the payment options, the 'Contribution rules' are listed in four numbered points. Further down, a note states: 'Americans living abroad may only contribute through ActBlue while physically in the United States. By proceeding with this transaction, you agree to ActBlue's terms & conditions.' At the very bottom, a small disclaimer reads: 'Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, click here.'

Donation page footer — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Richard Abraham — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Richard Abraham

Committee: Not identified by name in the material reviewed

Office Sought: State Representative, District 85

Campaign/Donation Page(s) Reviewed: abrahamfor85.com

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the website located at abrahamfor85.com for Richard Abraham, a candidate for State Representative in Michigan's 85th District. The homepage displays, in large bold text, the headline "Elect Richard Abraham for State Representative — Michigan's 85th District," accompanied by a photograph of the candidate and a "TAKE ACTION" call-to-action button in the upper right of the page — express advocacy expressly urging the candidate's election.

Complainant's designee scrolled through the remainder of the page, which displays a district boundary map, continuing to the bottom of the visible content. No "Paid for by" statement, committee name, or address of any kind appears anywhere on the page as captured. The page trails off into blank white space below the district map, with no footer disclaimer, contact information, or legal notice of any kind visible.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

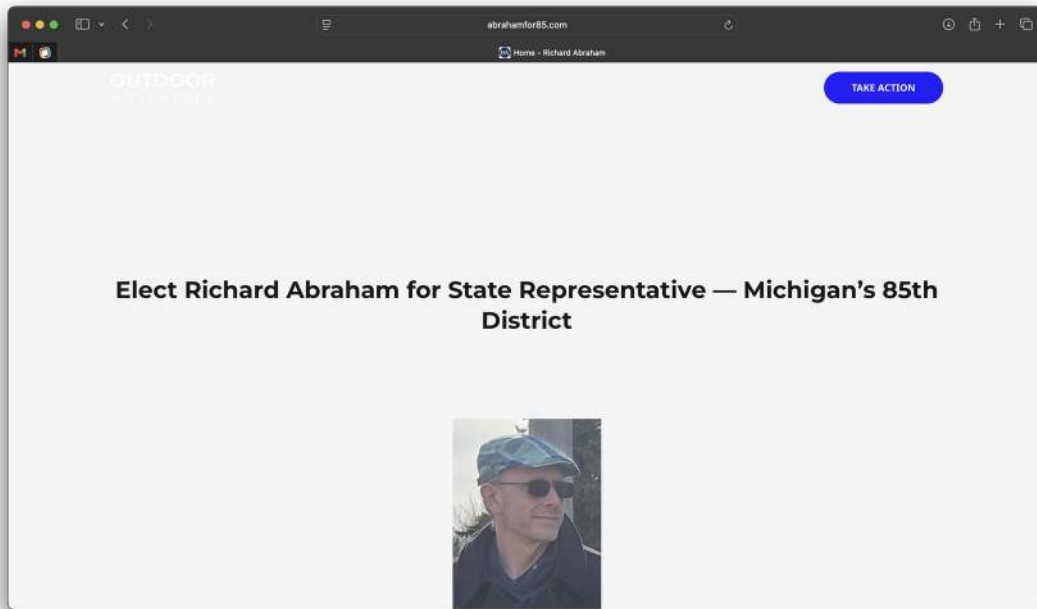
Signature: /s/ Vance Patrick

Printed Name: Vance Patrick
Date: August 31st, 2026

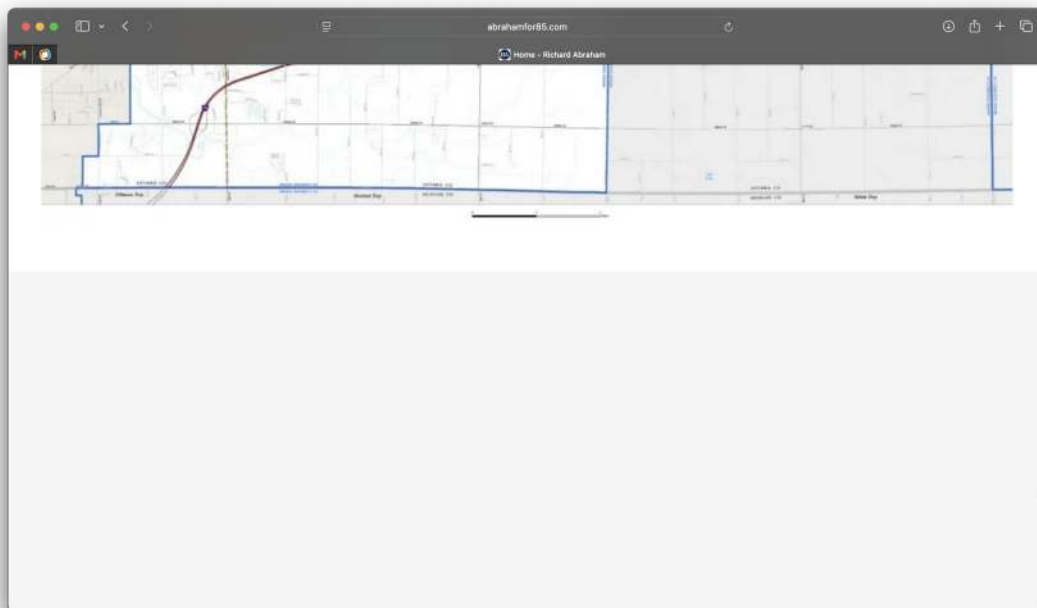
Enclosures: Exhibit A (campaign website screenshots)

EXHIBIT A

Screenshots of the abrahamfor85.com campaign website, captured on or about August 31, 2026



Top of homepage with 'Elect Richard Abraham for State Representative' headline and 'TAKE ACTION' button — no disclaimer present



Lower portion of the page (district map and blank area below it) — no 'Paid for by' disclaimer, committee name, or address appears anywhere on the page as reviewed

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Shereef Akeel — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrikmi@gmail.com

2. Respondent Information

Candidate: Shereef Akeel

Committee: Not identified by name in the material reviewed

Office Sought: Wayne State University Board of Governors

Campaign/Donation Page(s) Reviewed: <https://secure.actblue.com/donate/akeelforwsu> (donation page also serves as the campaign's website link)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed the donation page hosted at <https://secure.actblue.com/donate/akeelforwsu> soliciting contributions to “Shereef Akeel.” The page displays “AKEEL For WSU — Progress with Purpose” branding, states “Donate to Shereef Akeel!,” and explains that Shereef “is running for WSU Board of Governors,” with the amount section noting “Your contribution will benefit Shereef Akeel.” No campaign committee is named anywhere on the page, and no address appears in this section. This “AKEEL For WSU” campaign branding and the page's express directive to “Donate to Shereef Akeel!” constitute express advocacy for his election under *Golden v. Yahkind*, bringing the page within MCL 169.247's disclosure requirement.

The only funding-source disclosure on the page is the same footer boilerplate found across ActBlue pages, stating that the platform is “paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” This generic notice identifies only ActBlue, not a committee for Shereef Akeel, and includes no address for any such committee.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

Enclosures: Exhibit A (donation page screenshots)

EXHIBIT A

Screenshots of the *secure.actblue.com* donation page for Shereef Akeel, captured on or about August 29, 2026

AKEEL
For **WSU**
PROGRESS with PURPOSE

Donate to Shereef Akeel!

As a proud Wayne State graduate, civil rights attorney, and lifelong advocate for justice and opportunity, Shereef knows what it takes to make our university a place where everyone can thrive. Shereef is running for WSU Board of Governors to ensure that quality education remains affordable and accessible, to uphold academic freedom, and to strengthen the connection between Wayne State University and the communities it serves.

This campaign relies on people like you. Your contribution helps us reach more voters, share our message, and build momentum. Together, we can elect a leader who will fight for transparency, accountability, and excellence in higher education.

Chip in today to elect Shereef Akeel

Choose an amount:
Your contribution will benefit Shereef Akeel.

☒ Candidate

\$10 \$20 \$25 \$50
\$100 \$200 \$250 \$

Make it monthly!
Your sustaining support allows us to create budgets and plan ahead!

☐ Yes, count me in! ☒ No, donate once

Checkout
[Have an ActBlue Express account? Sign in to give faster.](#)

Donation page header — candidate branding, biography, and donation form, no disclaimer visible

Chip in today to elect Shereef Akeel

Checkout
[Have an ActBlue Express account? Sign in to give faster.](#)

Or

Contribution rules

1. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person.
2. I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder).
3. I am at least eighteen years old.
4. This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution.

Americans living abroad may only contribute through ActBlue while physically in the United States. By proceeding with this transaction, you agree to ActBlue's [terms & conditions](#).

Platform paid for by ActBlue ([actblue.com](#)) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, [click here](#).

Donation page footer — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Abbas Alawieh — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpattickmi@gmail.com

2. Respondent Information

Candidate: Abbas Alawieh

Committee: Not identified by name in the material reviewed

Office Sought: State Senate, District 2

Campaign/Donation Page(s) Reviewed: abbasformi.com;
<https://secure.actblue.com/donate/abbasformiwebsite> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed the donation page hosted at <https://secure.actblue.com/donate/abbasformiwebsite> soliciting contributions to “Abbas Alawieh.” The page displays “Abbas for State Senate” branding, states “Let's Send Abbas to the Michigan State Senate!,” and notes “Your contribution will benefit Abbas Alawieh.” No campaign committee is named anywhere on the page, and no address appears in this section. This “Abbas for State Senate” campaign branding and the page's express call to “Let's Send Abbas to the Michigan State Senate!” constitute express advocacy for his election under *Golden v. Yahkind*, bringing the page within MCL 169.247's disclosure requirement.

The only funding-source disclosure on the page is the standard ActBlue footer boilerplate, stating that the platform is “paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” This generic notice names only ActBlue, not a committee for Abbas Alawieh, and provides no address for any such committee.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

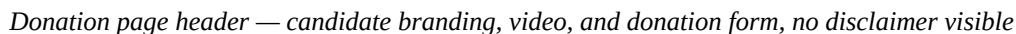
6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

Enclosures: Exhibit A (donation page screenshots)

Screenshots of the secure.actblue.com donation page for Abbas Alawieh, captured on or about August 29, 2026



August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Rebecca Amidon — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Rebecca Amidon

Committee: Friends of Rebecca Amidon

Office Sought: State Senate, District 32

Campaign/Donation Page(s) Reviewed: rebeccaamidon.com;
<https://secure.actblue.com/donate/rebecca-amidon-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the website located at rebeccaamidon.com for Rebecca Amidon, a candidate for State Senate in Michigan's 32nd District. The site header displays a "REBECCA AMIDON FOR STATE SENATE" wordmark logo together with "DONATE" and "VOLUNTEER" buttons, and a red banner further down reads "CONNECT WITH REBECCA."

The footer is arranged in three columns on a black background. The center column displays a "Rebecca Amidon - FOR MI - STATE SENATE" wordmark, social-media icons, links to "Terms & Conditions," "Privacy Policy," and "Accessibility Statement," and beneath those the statement: "© 2026 Paid for by FRIENDS OF REBECCA AMIDON. Powered and secured by Wix." The separate right-hand column, presented as general contact information rather than as part of that disclosure, displays the campaign's address: "P.O. Box 183, Manistee, MI 49660" together with a phone number. Because the "Paid for by FRIENDS OF REBECCA AMIDON" statement and the address are placed in visually distinct columns with different content groupings rather than combined into one statement, the identification does not satisfy MCL 169.247(1)'s requirement that the committee name and address appear together as a single, unified statement.

B. ActBlue Donation Page (Exhibit B)

On or about Monday, August 31, 2026, Complainant's designee accessed the linked ActBlue donation page at <https://secure.actblue.com/donate/rebecca-amidon-1>, captioned "Rebecca Amidon — Donate via ActBlue" and headed "Donate to Friends of Rebecca Amidon." The page displays a campaign graphic reading "REBECCA AMIDON FOR STATE SENATE" over an outline of Michigan, states "Rebecca is running for State Senate because she believes government should work for everyday people, not corporations or political insiders...", and directly solicits contributions with the question "Will you stand with Rebecca and make a donation today?"

Below that solicitation, the page states: "Checks can be mailed and made out to: Friends of Rebecca Amidon / P.O. Box 183 / Manistee, MI 49660." While this text pairs the committee's name with an address, it is framed as an instruction for mailing a paper check rather than as the statutorily required "Paid for by" identification statement; under the standard applicable to such material, a "mail a check" instruction does not satisfy MCL 169.247(1) even though both pieces of information appear on the same page. No separate "Paid for by Friends of Rebecca Amidon, P.O. Box 183, Manistee, MI 49660" disclosure statement appears anywhere on the page. The only other disclaimer-type text on the page is ActBlue's standard platform notice ("Platform paid for by ActBlue... and not authorized by any candidate or candidate committee...").

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

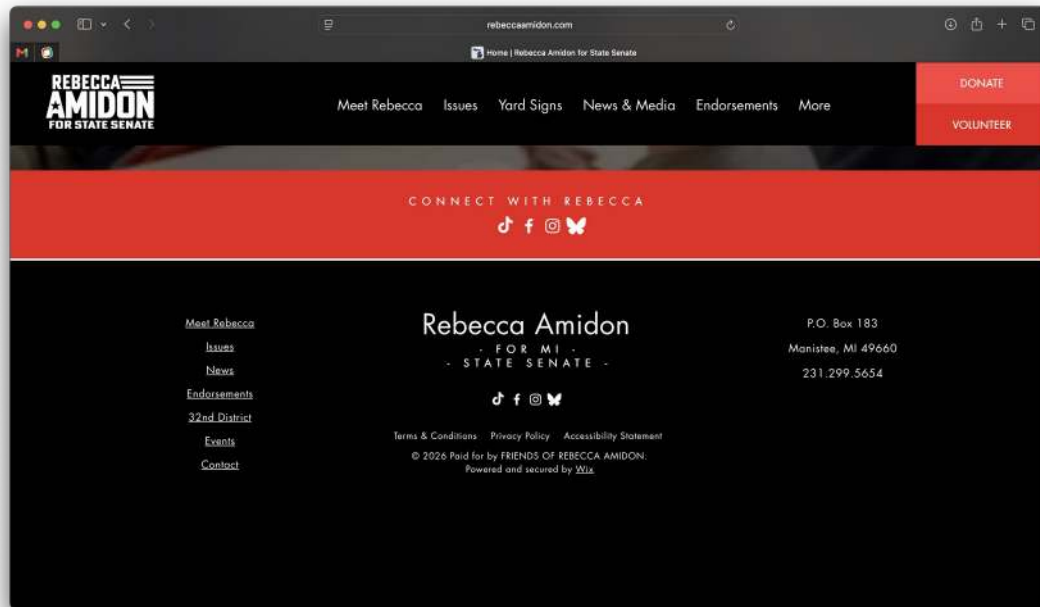
I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

Enclosures: Exhibit A (campaign website screenshot); Exhibit B (ActBlue donation page screenshots)

EXHIBIT A

Screenshot of the rebeccaamidon.com campaign website, captured on or about August 31, 2026



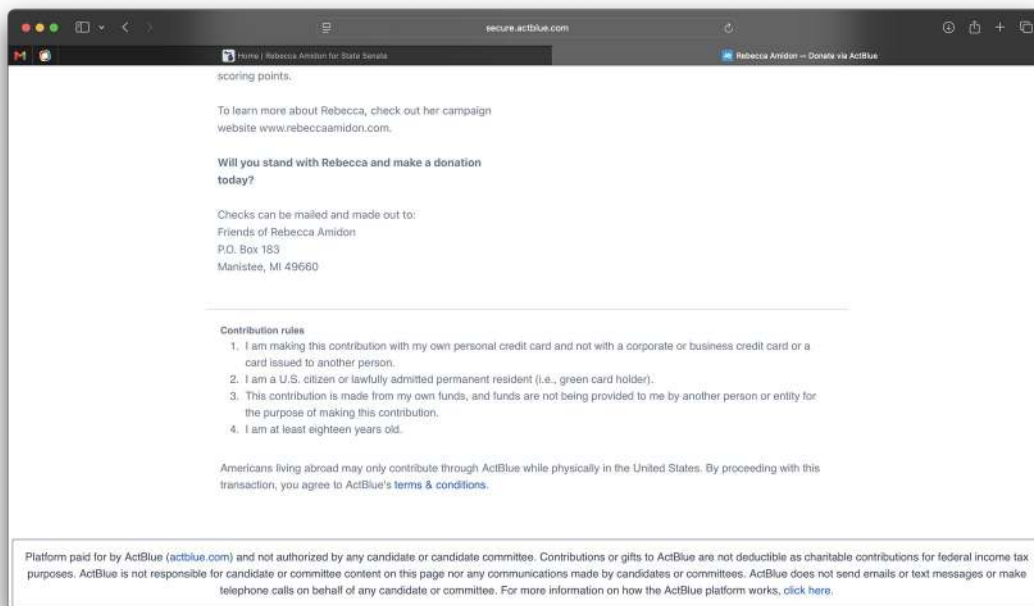
Website footer showing 'Paid for by FRIENDS OF REBECCA AMIDON' in the center column, separated from the P.O. Box address shown in the right-hand contact column

EXHIBIT B

Screenshots of the secure.actblue.com donation page for Rebecca Amidon, captured on or about August 31, 2026



Upper portion of donation page, with 'REBECCA AMIDON FOR STATE SENATE' campaign graphic and solicitation text



Lower portion of donation page showing the 'mail a check' instruction pairing committee name and address, plus ActBlue's generic platform notice

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Jack Bader — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrikmi@gmail.com

2. Respondent Information

Candidate: Jack Bader

Committee: Not identified by name in the material reviewed

Office Sought: State Representative, District 97

Campaign/Donation Page(s) Reviewed: jackbadermi.com;
<https://donate.stripe.com/bJedR9amC6DyeDjg3VeUU00> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the website located at jackbadermi.com for Jack Bader, a candidate for State Representative in Michigan's 97th District; the browser tab is titled "Jack Bader for State Representative." The captured portion of the page shows an "About Jack" section with a photograph of the candidate and biographical text, including: "I'm a lifelong resident of this area, a Realtor, and a small business owner working with families across Saginaw, Tuscola, Bay, and Genesee counties," and "I'm running because too many people feel like the system isn't working for them..."

The page's footer states only: "Copyright © 2026 Jack Bader for State Representative | Powered by Astra WordPress Theme." This is a copyright/software-attribution line, not a "Paid for by" disclosure — it names no committee and includes no address. No disclaimer satisfying MCL 169.247(1) appears anywhere on the page as captured.

B. Stripe Donation Page (Exhibit B)

On or about Monday, August 31, 2026, Complainant's designee accessed a linked donation page hosted at donate.stripe.com, captioned "Campaign Donation - Jack Bader for State Representative," which states: "Support Jack Bader's campaign for Michigan's 97th State House District. Contributions help fund outreach, events, and communication with voters across the district. Contributions are not tax deductible." The page presents a standard Stripe consumer checkout form (fields for email, full name, phone number, employer, and occupation, plus payment-method options including card, Apple Pay, Amazon Pay, and bank payment) defaulting to a \$25.00 donation.

The only text at the foot of the page is a generic "Powered by stripe" attribution with links to Stripe's own "Terms" and "Privacy" pages. Unlike ActBlue, Stripe's checkout interface does not display even a generic platform-level disclaimer comparable to ActBlue's boilerplate notice. No disclaimer of any kind — neither a committee-specific "Paid for by" statement nor a generic platform notice — appears anywhere on the donation page as captured.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

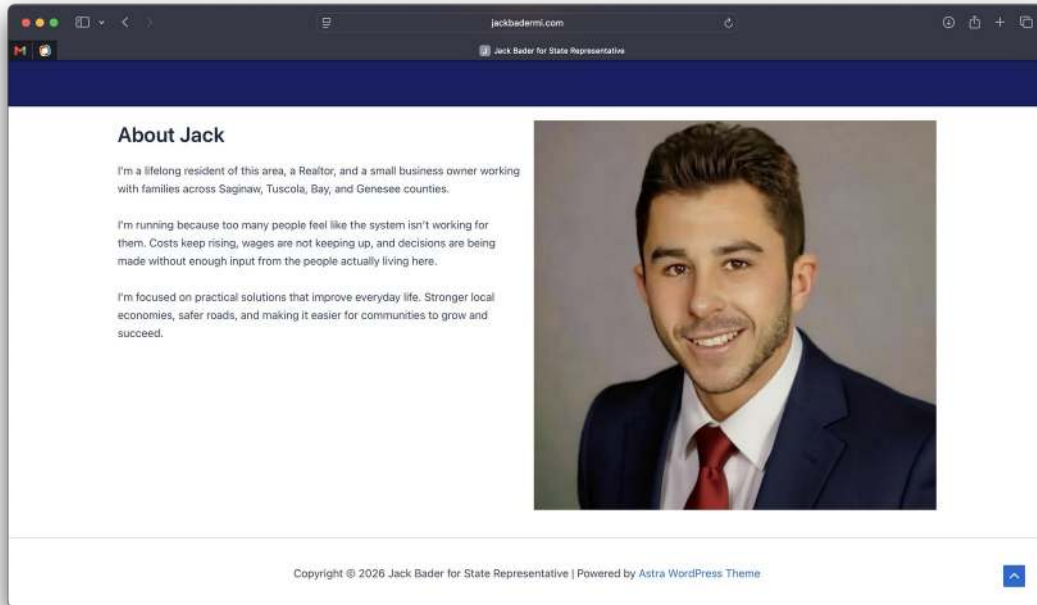
Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (campaign website screenshot); Exhibit B (Stripe donation page screenshot)

EXHIBIT A

Screenshot of the jackbadermi.com campaign website, captured on or about August 31, 2026



'About Jack' section and website footer — footer shows only a copyright/WordPress-theme attribution line, no 'Paid for by' disclaimer

EXHIBIT B

Screenshot of the donate.stripe.com donation page linked from Jack Bader's campaign website, captured on or about August 31, 2026

The screenshot shows a web browser window with the URL `donate.stripe.com`. The page is titled "Campaign Donation - Jack Bader for State Representative". It includes a description of the campaign and a photo of Jack Bader. The donation amount is set to \$25.00. The right side of the page contains a form for donor information, including email, full name, phone number, employer, and occupation. Below this is a "Payment method" section with options for Card, Apple Pay, Amazon Pay, and Bank. A checkbox for "Save my information for faster checkout" is checked. At the bottom, there is a "Donate" button and a link to the campaign's Terms and Privacy policy.

Campaign Donation - Jack Bader for State Representative

Support Jack Bader's campaign for Michigan's 97th State House District. Contributions help fund outreach, events, and communication with voters across the district. Contributions are not tax deductible.

\$25.00



email@example.com

Full name

(201) 555-0123

Employer

Occupation

Payment method

☐ Card

☐ Apple Pay

☐ Amazon Pay

☐ Bank

☒ Save my information for faster checkout

Pay securely at Jack Bader for State Representative and everywhere Link is accepted.

Donate

By paying, you agree to Link's Terms and Privacy.

Powered by stripe Terms Privacy

Stripe donation checkout page — no committee disclaimer or platform notice of any kind appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Ryan Bartholomew — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Ryan Bartholomew

Committee: Not identified by name in the material reviewed

Office Sought: Ann Arbor City Council, Ward 3

Campaign/Donation Page(s) Reviewed: ryanbforward3.com; <https://secure.actblue.com/donate/ryan-bartholomew-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee’s address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed the donation page hosted at <https://secure.actblue.com/donate/ryan-bartholomew-1> soliciting contributions to “Ryan Bartholomew.” The page displays “Ryan Bartholomew for City Council • Ward 3” branding, states “Support Ryan Bartholomew for Ann Arbor City Council!,” and notes “Your contribution will benefit Ryan Bartholomew.” No campaign committee is named anywhere on the page, and no address appears in this section. This “Ryan Bartholomew for City Council • Ward 3” campaign branding and the page's express directive to “Support Ryan Bartholomew for Ann Arbor City Council!” constitute express advocacy for his election under *Golden v. Yahkind*, bringing the page within MCL 169.247's disclosure requirement.

The only funding-source disclosure on the page is the standard ActBlue footer boilerplate, stating that the platform is “paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” This generic notice names only ActBlue, not a committee for Ryan Bartholomew, and provides no address for any such committee.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

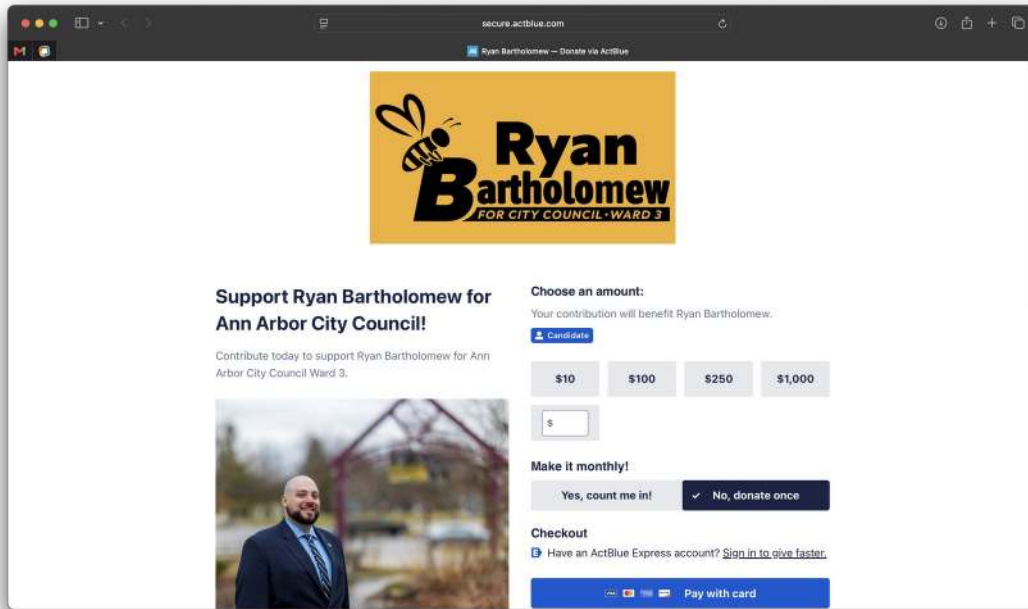
I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

Enclosures: Exhibit A (donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Ryan Bartholomew, captured on or about August 29, 2026



secure.actblue.com

Ryan Bartholomew — Donate via ActBlue

Ryan Bartholomew
FOR CITY COUNCIL • WARD 3

Support Ryan Bartholomew for Ann Arbor City Council!

Contribute today to support Ryan Bartholomew for Ann Arbor City Council Ward 3.

Choose an amount:
Your contribution will benefit Ryan Bartholomew.

[Candidate](#)

\$10 \$100 \$250 \$1,000

\$

Make it monthly!

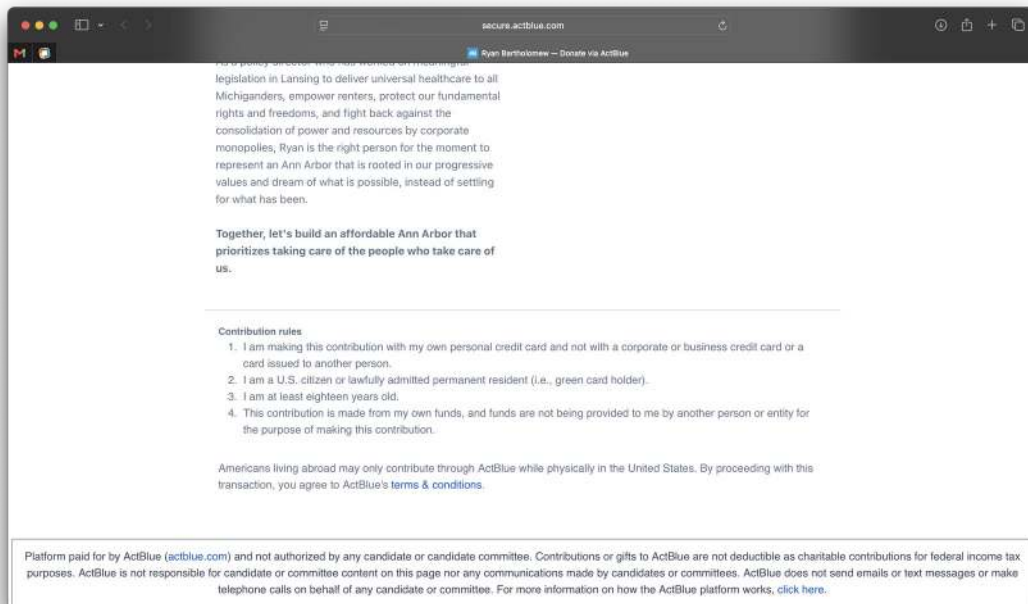
Yes, count me in! ☒ No, donate once

Checkout

☒ Have an ActBlue Express account? [Sign in to give faster.](#)

[Pay with card](#)

Donation page header — candidate branding, photo, and donation form, no disclaimer visible



secure.actblue.com

Ryan Bartholomew — Donate via ActBlue

...to policy on cover that has worked on Michigan's
legislation in Lansing to deliver universal healthcare to all
Michiganers, empower renters, protect our fundamental
rights and freedoms, and fight back against the
consolidation of power and resources by corporate
monopolies, Ryan is the right person for the moment to
represent an Ann Arbor that is rooted in our progressive
values and dream of what is possible, instead of settling
for what has been.

Together, let's build an affordable Ann Arbor that
prioritizes taking care of the people who take care of
us.

Contribution rules

1. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person.
2. I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder).
3. I am at least eighteen years old.
4. This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution.

Americans living abroad may only contribute through ActBlue while physically in the United States. By proceeding with this transaction, you agree to ActBlue's [terms & conditions](#).

Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, [click here](#).

Donation page footer — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Sherry A. Berecz — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrikmi@gmail.com

2. Respondent Information

Candidate: Sherry A. Berecz

Committee: Not identified by name in the material reviewed

Office Sought: State Representative, District 28

Campaign/Donation Page(s) Reviewed: sherryberecz.com; <https://secure.actblue.com/donate/sherry-berecz-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee’s address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate’s name with campaign branding — typically a logo or banner pairing the candidate’s name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate’s campaign. Material of that character is express advocacy for the candidate’s election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247’s reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Saturday, August 29, 2026, Complainant’s designee accessed the donation page hosted at <https://secure.actblue.com/donate/sherry-berecz-1> soliciting contributions to “Sherry Berecz.” The page displays “Sherry Berecz for State Representative” branding, states “Donate to Sherry Berecz!,” and notes “Your contribution will benefit Sherry Berecz.” No campaign committee is named anywhere on the page, and no address appears in this section. This “Sherry Berecz for State Representative” campaign branding and the page’s express directive to “Donate to Sherry Berecz!” constitute express advocacy for her election under *Golden v. Yahkind*, bringing the page within MCL 169.247’s disclosure requirement.

The only funding-source disclosure on the page is the standard ActBlue footer boilerplate, stating that the platform is “paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” This generic notice names only ActBlue, not a committee for Sherry Berecz, and provides no address for any such committee.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent’s campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

Enclosures: Exhibit A (donation page screenshots)

EXHIBIT A

Screenshots of the *secure.actblue.com* donation page for Sherry Berez, captured on or about August 29, 2026

The screenshot shows the top portion of a web browser window displaying the donation page for Sherry Berez. The browser's address bar shows 'secure.actblue.com' and the page title is 'Sherry Berez - Donate via ActBlue'. A 'Secured by ActBlue' badge is in the top right corner. The main heading is 'SHERRY BERECZ for STATE REPRESENTATIVE' in large blue and red letters. Below this, the text 'Donate to Sherry Berez!' is followed by a short paragraph: 'Pitch in today to support Sherry Berez for State Representative. Together, we can move our community forward.' To the right, under 'Choose an amount:', it says 'Your contribution will benefit Sherry Berez.' and 'Candidates'. There are buttons for \$5, \$10, \$20, \$25, \$50, \$100, \$200, and a custom amount field. Below that, 'Make it monthly!' is followed by a text box and two buttons: 'Yes, count me in!' and 'No, donate once' (which is selected). At the bottom, a 'Checkout' section is partially visible.

Donation page header — candidate branding and donation form, no disclaimer visible

The screenshot shows the bottom portion of the same web browser window. The 'Checkout' section is fully visible, with a link 'Have an ActBlue Express account? Sign in to give faster.' and three payment buttons: 'Pay with card', 'Apple Pay', and 'Donate with G Pay'. Below the payment options, the 'Contribution rules' are listed in four numbered points. Further down, a line of text states: 'Americans living abroad may only contribute through ActBlue while physically in the United States. By proceeding with this transaction, you agree to ActBlue's terms & conditions.' At the very bottom, a small disclaimer box reads: 'Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, click here.'

Donation page footer — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Lester Booker Jr. — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Lester Booker Jr.

Committee: Not identified by name in the material reviewed

Office Sought: Plymouth-Canton Community Schools Board of Education, Board Member

Campaign/Donation Page(s) Reviewed: No campaign website listed;
givebutter.com/VoteBookerjr4pccs (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed the donation page hosted at givebutter.com titled “Lester Booker Jr. for Plymouth-Canton Community School Board.” The page's biographical text states the candidate is “running for the two-year term on the Plymouth-Canton Community Schools Board of Education” and is signed “—Lester Booker Jr., MSA,” and a footer line reads “Organized by Lester Booker Jr. for PCCS.” No portion of the page contains a “Paid for by” statement, and no address for the candidate, an organizer, or any committee appears anywhere on the page. This page title, “Lester Booker Jr. for Plymouth-Canton Community School Board,” together with the biographical statement that he is running for the Board seat, constitutes express advocacy for his election under *Golden v. Yahkind*, bringing the page within MCL 169.247's disclosure requirement.

The donation-amount panel likewise contains no funding-source disclosure of any kind — unlike the ActBlue pages reviewed for other candidates, this page does not even display a generic platform-level disclaimer. No committee name and no address appear anywhere in the material reviewed.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

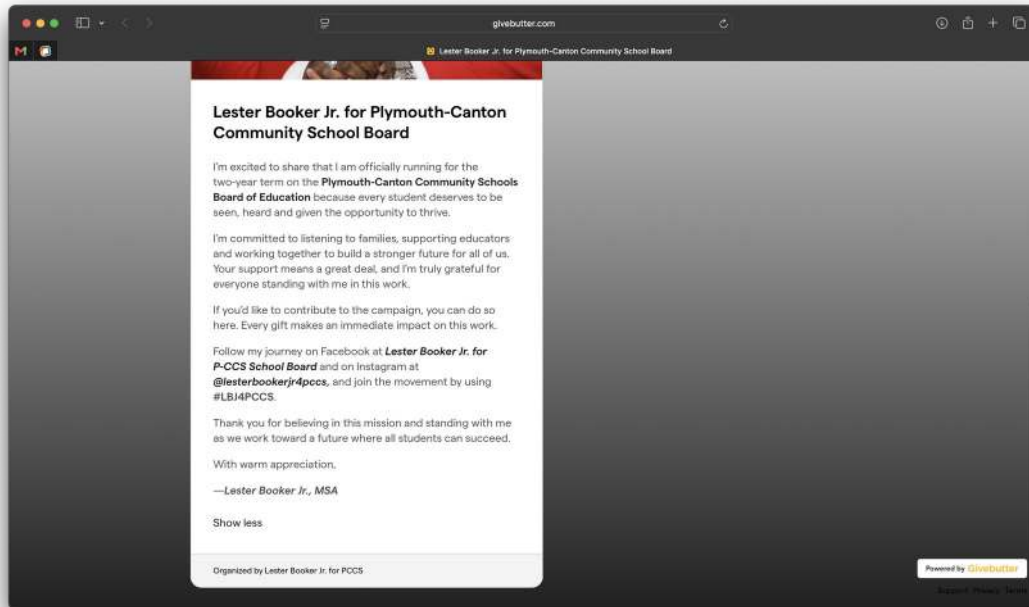
I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

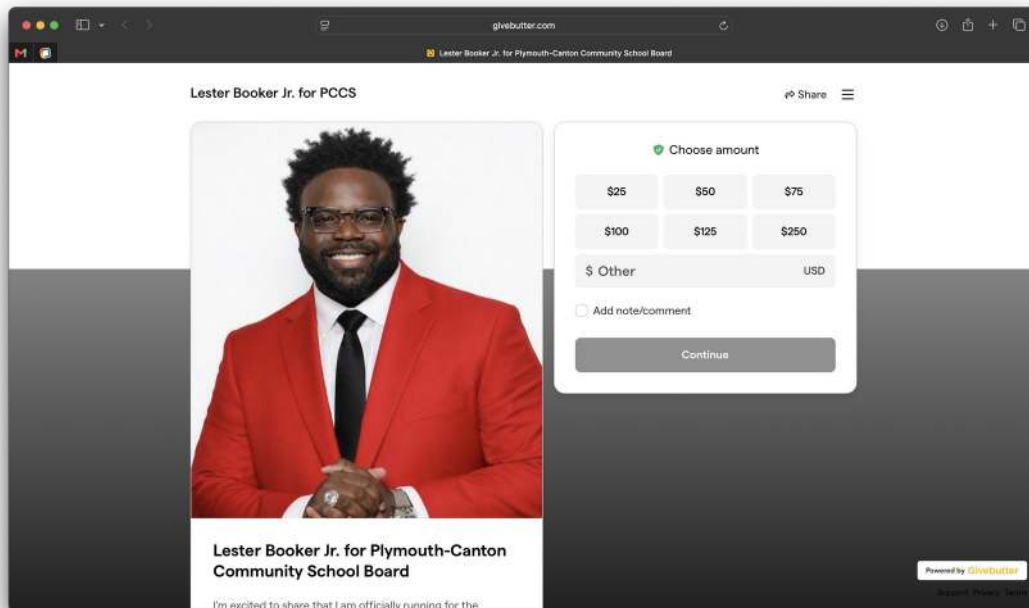
Enclosures: Exhibit A (donation page screenshots)

EXHIBIT A

Screenshots of the *givebutter.com* donation page for Lester Booker Jr., captured on or about August 29, 2026



Donation page biography and footer — “Organized by Lester Booker Jr. for PCCS,” no “Paid for by” statement or address



Donation page header and amount-selection panel — no disclaimer of any kind visible

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Felicia Brabec — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Felicia Brabec

Committee: Not identified by name in the material reviewed

Office Sought: State Senator, District 15

Campaign/Donation Page(s) Reviewed: feliciabrabec.com; <https://secure.actblue.com/donate/felicia-brabec-website2> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed the donation page hosted at <https://secure.actblue.com/donate/felicia-brabec-website2> soliciting contributions to “Felicia Brabec.” The page displays “Felicia Brabec — Democrat for State Senate” branding, states “Donate to Felicia Brabec!,” and notes “Your contribution will benefit Felicia Brabec.” No campaign committee is named anywhere on the page, and no address appears in this section. This “Felicia Brabec — Democrat for State Senate” campaign branding and the page's express directive to “Donate to Felicia Brabec!” constitute express advocacy for her election under *Golden v. Yahkind*, bringing the page within MCL 169.247's disclosure requirement.

The only funding-source disclosure on the page is the standard ActBlue footer boilerplate, stating that the platform is “paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” This generic notice names only ActBlue, not a committee for Felicia Brabec, and provides no address for any such committee.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

Enclosures: Exhibit A (donation page screenshots)

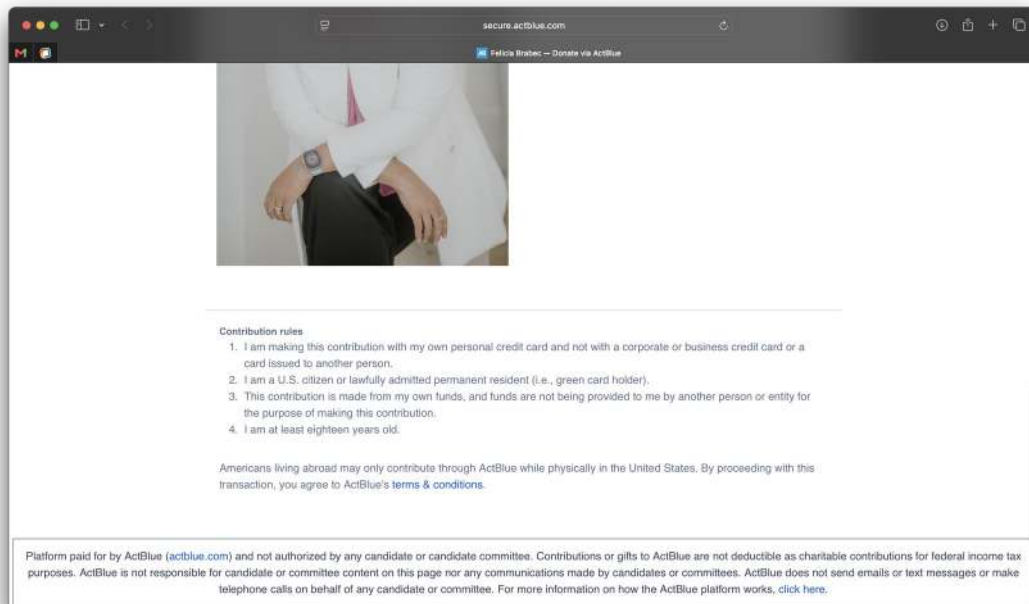
EXHIBIT A

Screenshots of the secure.actblue.com donation page for Felicia Brabec, captured on or about August 29, 2026



The screenshot shows the top portion of a donation page for Felicia Brabec. At the top is a navigation bar with the URL 'secure.actblue.com' and a breadcrumb 'Felicia Brabec - Donate via ActBlue'. Below this is a large header with the text 'Felicia BRABEC' in blue and green, followed by 'DEMOCRAT for STATE SENATE' in a green box. To the right of the text is a blue silhouette of the state of Michigan. Below the header, the page is divided into two columns. The left column contains a 'Donate to Felicia Brabec!' section with a thank-you message, a paragraph about her work, and a paragraph about her legislative achievements. The right column contains a 'Choose an amount:' section with a 'Candidates' button and a grid of donation amounts: \$50, \$100, \$250, \$500, \$1,000, \$2,450, and a custom amount field. Below this is a 'Make it monthly!' section with two radio buttons: 'Yes, count me in!' and 'No, donate once'. At the bottom of the right column is a 'Checkout' section with a link to 'Sign in to give faster' and a 'Pay with card' button.

Donation page header — candidate branding and donation form, no disclaimer visible



The screenshot shows the bottom portion of the donation page. It features a large image of a person in a white lab coat. Below the image is a 'Contribution rules' section with four numbered rules. Below the rules is a paragraph about Americans living abroad. At the bottom is a disclaimer paragraph. The disclaimer states: 'Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, click here.'

Donation page footer — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Kelly Breen — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Kelly Breen

Committee: Not identified by name in the material reviewed

Office Sought: State Representative (district not stated in the material reviewed)

Campaign/Donation Page(s) Reviewed: vote.kellybreen.com;
<https://secure.actblue.com/donate/kellybreenwebsite> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee’s address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate’s name with campaign branding — typically a logo or banner pairing the candidate’s name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate’s campaign. Material of that character is express advocacy for the candidate’s election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247’s reach.

4. Statement of Facts

A. Campaign Website and Donation Page (Exhibit A)

On or about Friday, August 28, 2026, Complainant’s designee accessed the website located at votekellybreen.com for Kelly Breen, a candidate for Michigan State Representative. The homepage displays the candidate’s name, campaign branding, an event date, and “Volunteer” and “Donate” buttons, but contains no footer text, fine print, or other identification of any kind — no “Paid for by” statement naming a person or committee, and no address. This display of campaign branding together with direct “Volunteer” and “Donate” calls to action constitutes express advocacy for Kelly Breen’s election under *Golden v. Yahkind*, bringing the page within MCL 169.247’s disclosure requirement.

Complainant’s designee also accessed a linked donation page hosted at <https://secure.actblue.com/donate/kellybreenwebsite> soliciting contributions to Kelly Breen. Its only funding-source disclosure is a footer notice stating that the platform itself is “paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” No statement identifying a campaign committee for the candidate, by name or address, appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent’s campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

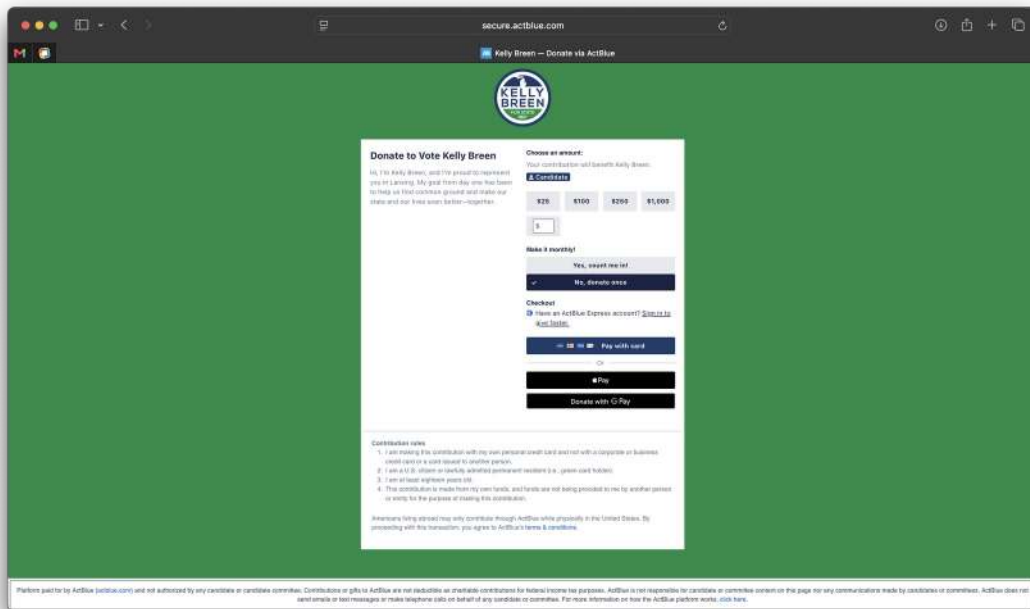
Enclosures: Exhibit A (website and donation page screenshots)

EXHIBIT A

Screenshots of votekellybreen.com and the linked secure.actblue.com donation page for Kelly Breen, captured on or about August 28, 2026



Campaign website homepage — no disclaimer visible



Linked ActBlue donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Brendan J. Johnson — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Brendan J. Johnson

Committee: Brendan Johnson for State Senate

Office Sought: State Senate, District 26

Campaign/Donation Page(s) Reviewed: johnsonforsenate.us;
<https://secure.actblue.com/donate/brendan-johnson> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the website located at johnsonforsenate.us for Brendan J. Johnson, a candidate for State Senate in Michigan's 26th District; the browser tab is titled "Brendan J. Johnson for Michigan State Senate District 26." The site header displays a "JOHNSON FOR SENATE" wordmark logo and a gold "Get Involved" call-to-action button. A fact-table section on the page states, among other things: "Candidate: Brendan J. Johnson, 29, grew up on a dairy farm in Fostoria... Race: Michigan State Senate District 26... Campaign: No corporate PAC money. No hired staff. Lean, grassroots, and self-run."

The footer's left column, headed "Brendan J. Johnson for State Senate" in bold with the tagline "Determined to Do Right," lists the address "PO Box 164, Bridgeport, MI 48722" together with a phone number and email address as general campaign contact information. Separately, a full-width bar at the very bottom of the page — visually set apart by its own background band from the contact-information column above it — states on the left: "Paid for by Brendan Johnson for State Senate," and on the right: "© 2026 Brendan Johnson for State Senate. All rights reserved." The "Paid for by" statement itself includes no address; the page's only address appears in the separate section above, so the required identification does not appear as a single, unified statement as MCL 169.247(1) requires.

B. ActBlue Donation Page (Exhibit B)

On or about Monday, August 31, 2026, Complainant's designee accessed the linked ActBlue donation page at <https://secure.actblue.com/donate/brendan-johnson>, captioned "Brendan Johnson — Donate via ActBlue" and headed "Brendan J. Johnson for State Senate — District 26." The page states: "Hi! I'm Brendan J. Johnson, and I'm running for Michigan State Senate in District 26... No corporate PAC money, no hired staff, no consultants... Every dollar donated goes directly toward reaching more voters: door-to-door materials, voter outreach, and letting people know about my campaign across all four counties," concluding "Long shots are how 29-year-olds from dairy farms in Fostoria change things. Thank you for being part of this!" — express solicitation language tied directly to the candidacy.

The only disclaimer text appearing on the donation page is ActBlue's standard platform notice ("Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee..."). No committee-specific "Paid for by" statement appears anywhere on the donation page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

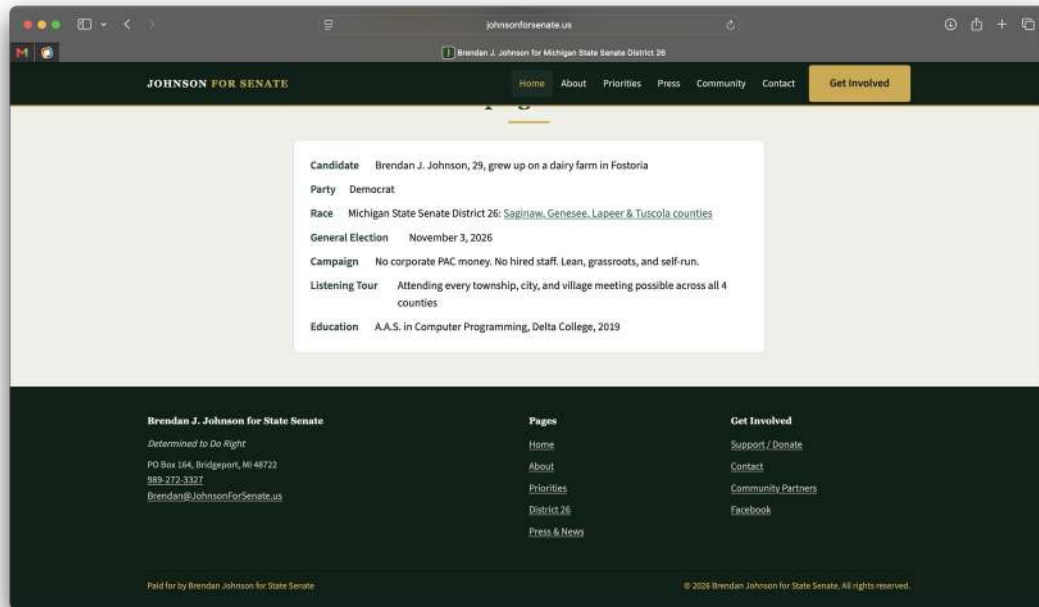
Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (campaign website screenshot); Exhibit B (ActBlue donation page screenshots)

EXHIBIT A

Screenshot of the johnsonforsenate.us campaign website, captured on or about August 31, 2026



Website footer showing the contact-information column (with the PO Box address) separated from the bottom bar's 'Paid for by Brendan Johnson for State Senate' statement, which includes no address

EXHIBIT B

Screenshots of the secure.actblue.com donation page for Brendan J. Johnson, captured on or about August 31, 2026

This screenshot shows the top half of a donation page. On the left, there is a campaign photo of a man with a beard and a blue shirt. To the right of the photo, the text reads: "Brendan J. Johnson for State Senate — District 26". Below this, a paragraph of text describes his background: "Hi! I'm Brendan J. Johnson, and I'm running for Michigan State Senate in District 26. I grew up on my family's former dairy farm in Fostoria, earned my degree at Delta College, and this district is my home. Right now, I'm on a listening tour attending local government meetings across Genesee, Lapeer, Saginaw, and Tuscola counties to hear directly from the people I'm running to represent." Another paragraph follows: "No corporate PAC money, no hired staff, no consultants. Just me, a manual transmission 2006 Corolla with over 274,000 miles & counting, and the determination to do what's right. Every dollar donated goes directly toward reaching more voters: door-to-door materials, voter outreach, and letting people know about my campaign across all four counties." On the right side of the page, under the heading "Choose an amount:", it says "Your contribution will benefit Brendan Johnson." Below this is a "Candidate" button and a grid of donation amount buttons: "\$30", "\$5", "\$10", "\$20", "\$50", "\$100", and a custom amount field with a "\$" symbol. Further down, there is a "Make it monthly!" section with a text box "Your sustaining support allows us to create budgets and plan ahead!" and two buttons: "Yes, count me in!" and "No, donate once" (which is selected). At the bottom right, a "Checkout" button is visible.

Upper portion of donation page with campaign photo and solicitation text

This screenshot shows the bottom half of the donation page. On the left, the text continues from the previous section: "outreach, and letting people know about my campaign across all four counties." and "Long shots are how 29-year-olds from dairy farms in Fostoria change things. Thank you for being part of this!". On the right, the "Checkout" section is prominent. It includes a link: "Have an ActBlue Express account? [Sign in to give faster.](#)". Below this are three payment options: "Pay with card" (with a Visa logo), "Pay" (with an Apple logo), and "Donate with Pay" (with a Google Pay logo). Below the payment options, there is a "Contribution rules" section with four numbered items: "1. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person.", "2. I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder).", "3. This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution.", and "4. I am at least eighteen years old." Below the rules, a note states: "Americans living abroad may only contribute through ActBlue while physically in the United States. By proceeding with this transaction, you agree to ActBlue's [terms & conditions.](#)". At the very bottom, a small disclaimer reads: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, [click here.](#)"

Lower portion of donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Julie Brixie — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Julie Brixie

Committee: Not identified by name in the material reviewed

Office Sought: State Representative, District 73

Campaign/Donation Page(s) Reviewed: juliebrixie.com; <https://secure.actblue.com/donate/friends-of-julie-brixie-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. ActBlue Donation Page (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the linked ActBlue donation page at secure.actblue.com/donate/friends-of-julie-brixie-1, captioned "Julie Brixie — Donate via ActBlue." The page displays the headline "Help support Julie and democracy!" together with a large stylized campaign graphic reading "Julie Brixie STATE REPRESENTATIVE" accompanied by a green star icon — express-advocacy branding combining the candidate's name with the office sought. Below that, the page solicits contributions in specified amounts (shown as \$10, \$25, \$50, \$100, \$250, \$500, and \$1,225, plus a custom-amount field) and offers a monthly-giving option.

The only disclaimer text appearing on either captured portion of the page is ActBlue's standard platform notice ("Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee..."). No committee-specific "Paid for by [Committee], [Address]" statement appears anywhere on the page as captured. (The donation link's URL slug, "friends-of-julie-brixie-1," suggests the supporting committee may be named "Friends of Julie Brixie," but no such name appears as visible text anywhere on the page itself.)

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (ActBlue donation page screenshots)

EXHIBIT A

Screenshots of the *secure.actblue.com* donation page for Julie Brixie, captured on or about August 31, 2026

Help support Julie and democracy!

Julie Brixie
STATE REPRESENTATIVE

Choose an amount:
Your contribution will benefit Julie Brixie.

[Candidate](#)

\$10 \$25 \$50 \$100
\$250 \$500 \$1,225 \$

Make it monthly!

Yes, count me in! ☒ No, donate once

Checkout

Have an ActBlue Express account? [Sign in to give faster.](#)

Pay with card

Or

Apple Pay

Donate with Google Pay

Contribution rules

1. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person.

Upper portion of donation page with 'Julie Brixie STATE REPRESENTATIVE' campaign graphic and 'Help support Julie and democracy!' headline

STATE REPRESENTATIVE

Checkout

Have an ActBlue Express account? [Sign in to give faster.](#)

Pay with card

Or

Apple Pay

Donate with Google Pay

Contribution rules

1. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person.
2. I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder).
3. I am at least eighteen years old.
4. This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution.

Americans living abroad may only contribute through ActBlue while physically in the United States. By proceeding with this transaction, you agree to ActBlue's [terms & conditions](#).

Platform paid for by ActBlue ([actblue.com](#)) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, [click here](#).

Lower portion of donation page — only ActBlue's generic platform notice appears, no committee-specific disclaimer

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Willie Burton — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Willie Burton

Committee: Willie Burton for MI

Office Sought: State Representative, District 9

Campaign/Donation Page(s) Reviewed: willieburton.com

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed the website located at willieburton.com for Willie Burton, a candidate for State Representative, District 9. A campaign graphic displayed on the page carries the caption “Paid for by Willie Burton for MI,” with no address of any kind accompanying it. Further down the same page, a sidebar heading states “Campaign related items PAID FOR BY WILLIE BURTON FOR MI,” followed immediately by the line “Detroit Mi 48207.” That line supplies only a city, state, and ZIP code — no street address or post office box for the committee appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

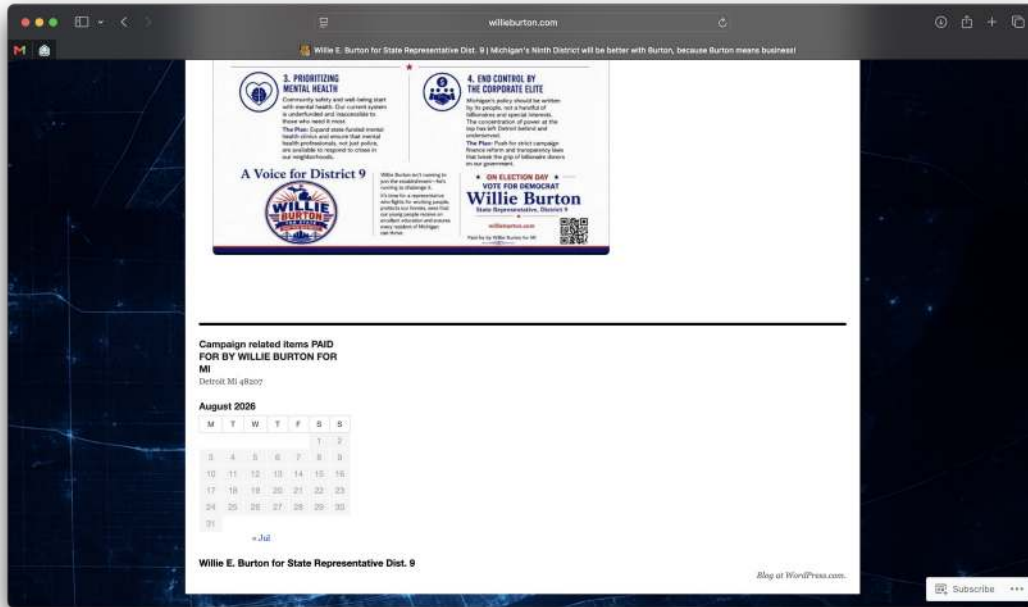
I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

Enclosures: Exhibit A (website screenshot)

EXHIBIT A

Screenshot of the willieburton.com footer, captured on or about August 29, 2026



Website footer — committee named with city/state/ZIP only, no street address or PO box

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Candace Calloway — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Candace Calloway

Committee: Committee to Elect Candace Calloway

Office Sought: State Representative, District 5

Campaign/Donation Page(s) Reviewed: votecandacecalloway.com

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Friday, August 28, 2026, Complainant's designee accessed the website located at votecandacecalloway.com for Candace Calloway, a candidate for Michigan State Representative, District 5. The footer of the page states “Paid for by Committee to Elect Candace Calloway,” followed by a copyright notice, a campaign email address, and a phone number. No mailing address for the committee appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

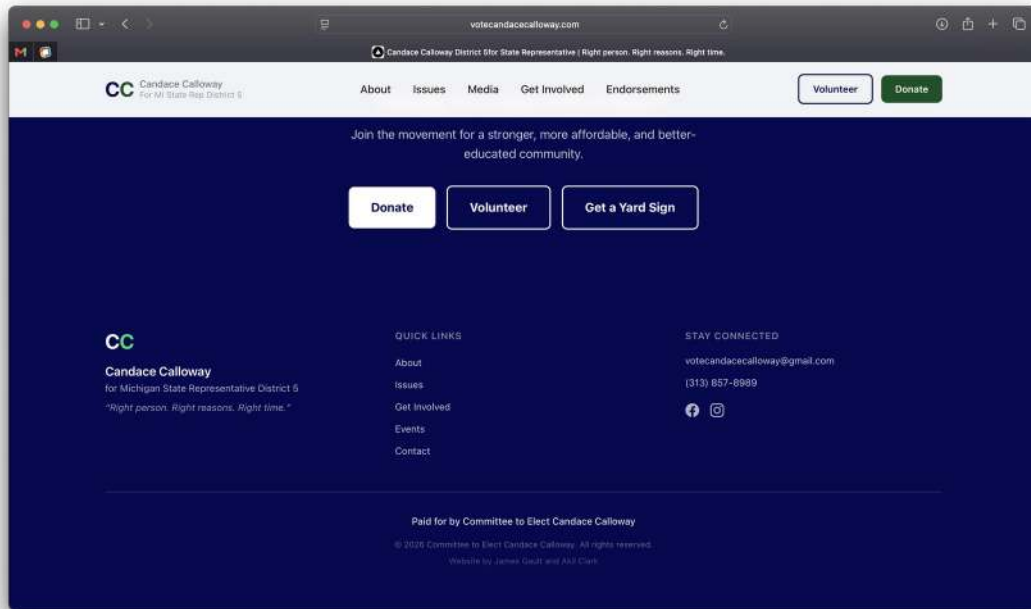
I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

Enclosures: Exhibit A (website screenshot)

EXHIBIT A

Screenshot of the votecandacecalloway.com footer, captured on or about August 28, 2026



Website footer — committee named but no address given

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Darrin Camilleri — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Darrin Camilleri

Committee: Darrin Camilleri for State Senate

Office Sought: State Senate, District 4

Campaign/Donation Page(s) Reviewed: darrincamilleri.com

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed the website located at darrincamilleri.com for Darrin Camilleri (also referred to in campaign material as Darren Camilleri), a candidate for State Senate, District 4. The page footer contains two visually separate statements: a “Contact:” line reading “info@darrincamilleri.com” and “PO Box 818 Trenton, MI 48183,” and, set apart from it, a copyright notice reading “Copyright © 2026. All rights reserved. Paid for and authorized by Darrin Camilleri for State Senate.” The “Paid for and authorized by” statement itself contains no address; the PO Box appears only in the separate general contact line, not as part of a unified funding-source disclosure.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

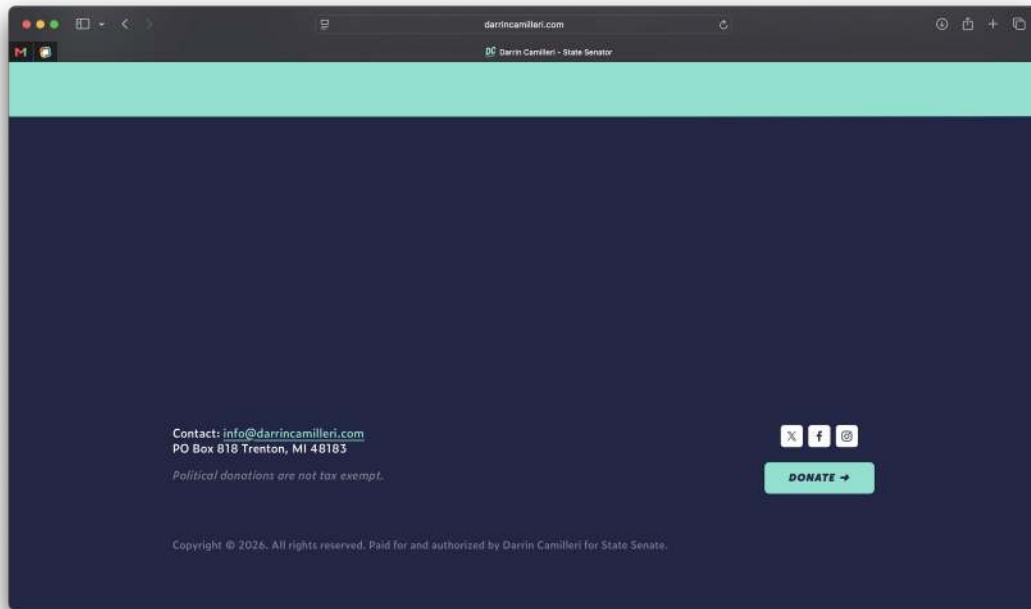
I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

Enclosures: Exhibit A (website screenshot)

EXHIBIT A

Screenshot of the darrincamilleri.com footer, captured on or about August 29, 2026



Website footer — “Paid for by” statement and PO Box address appear in separate blocks

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Tyrone Carter — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Tyrone Carter

Committee: Not identified by name in the material reviewed

Office Sought: State Representative, District 1

Campaign/Donation Page(s) Reviewed: electtyronecarter.com

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the website located at electtyronecarter.com; the browser tab is titled "VOTE | Elect Tyrone Carter." Both the domain name itself and the browser-tab title constitute express advocacy expressly urging the candidate's election. The captured portion of the page confirms the site depicts Tyrone Carter — not Brenda Carter, the District 53 candidate whose website is separately identified in Complainant's reference materials as compliant — including a candidate photograph and an embedded video captioned "Rep. Tyrone Carter Fig[hts...]" from "Michigan House Democrats," displayed under a section header reading "TYRONE'S MESSAGE." Adjacent sections are headed "UPCOMING EVENTS" (listing, among other things, an "Election Day - State Primary" entry) and "CONNECT ONLINE," with links including "Like Tyrone on Facebook" and "Follow Tyrone on Instagram."

The footer of the page states only: "© 2020 by Tyrone Carter for State Rep." This is a copyright-style attribution line, not a statutory "Paid for by" disclosure; it does not use the required "Paid for by" language and includes no address of any kind. No disclaimer satisfying MCL 169.247(1) appears anywhere on the page as captured. Complainant notes that the visible copyright year of "2020" suggests this footer text may be a leftover artifact from an earlier version of the site template, but it is nonetheless the disclosure language currently displayed on the live, active campaign website as of the date of this review.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and

- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

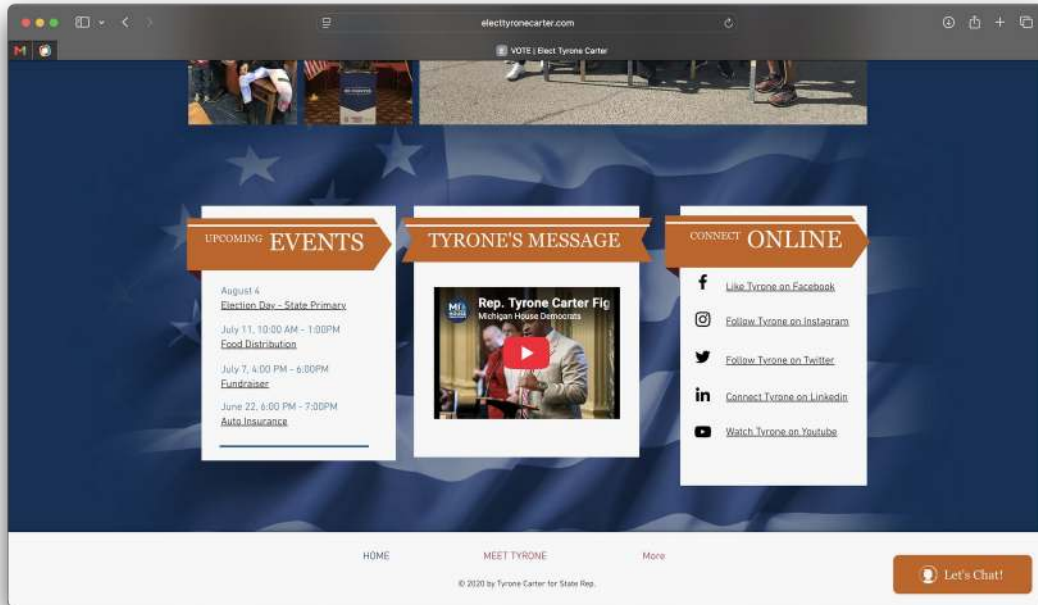
Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (campaign website screenshot)

EXHIBIT A

Screenshot of the electtyronecarter.com campaign website, captured on or about August 31, 2026



Campaign website footer showing only a '© 2020 by Tyrone Carter for State Rep.' copyright line — no 'Paid for by' statement, committee name, or address

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Luke Del Castillo — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrikmi@gmail.com

2. Respondent Information

Candidate: Luke Del Castillo

Committee: Friends of Luke Del Castillo

Office Sought: State Representative, District 92

Campaign/Donation Page(s) Reviewed: ivoteluke.com; <https://secure.actblue.com/donate/ivoteluke> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the website located at ivoteluke.com for Luke Del Castillo, a candidate for State Representative in Michigan's 92nd District; the browser tab is titled "I Vote Luke." The captured portion of the page includes campaign biographical text ("At his core, Luke believes public service is about people. It is about meeting neighbors where they are, understanding what they are going through, and fighting for practical solutions...") and a scrolling marquee banner repeating the phrase "FUEL THE FIGHT," together with a "DONATE" button and QR code in the lower left of the page.

The lower right of the page displays an "I VOTE LUKE" wordmark together with the campaign's general contact information: "PO Box 24, Mount Pleasant, MI 48858," an email address, and a phone number. Separately, at the very bottom of the page, in a distinct horizontal bar below that contact block, the site states: "Paid for by Friends of Luke Del Castillo | © 2026 Friends of Luke Del Castillo. All rights reserved." That "Paid for by" statement itself includes no address; the only address on the page appears earlier, in the separate "I VOTE LUKE" contact block, set apart in different formatting and page position. The required identification therefore does not appear as a single, unified statement, as MCL 169.247(1) requires.

B. ActBlue Donation Page (Exhibit B)

On or about Monday, August 31, 2026, Complainant's designee accessed the linked ActBlue donation page at <https://secure.actblue.com/donate/ivoteluke>, captioned "Luke Del Castillo — Donate via ActBlue" and headed "Donate to Luke Del Castillo!" The page states: "Luke Del Castillo is running for State Representative in Michigan's 92nd District to fight for working families, strengthen local economies, support small businesses, and make sure rural and mid-Michigan communities have a real voice in Lansing... Your contribution helps us knock doors, reach voters, host community events, and build a people-powered campaign rooted in listening, service, and common sense," concluding with the direct solicitation "Donate today to help send Luke to Lansing."

The only disclaimer text appearing on the donation page is ActBlue's standard platform notice ("Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee..."). No committee-specific "Paid for by" statement appears anywhere on the donation page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

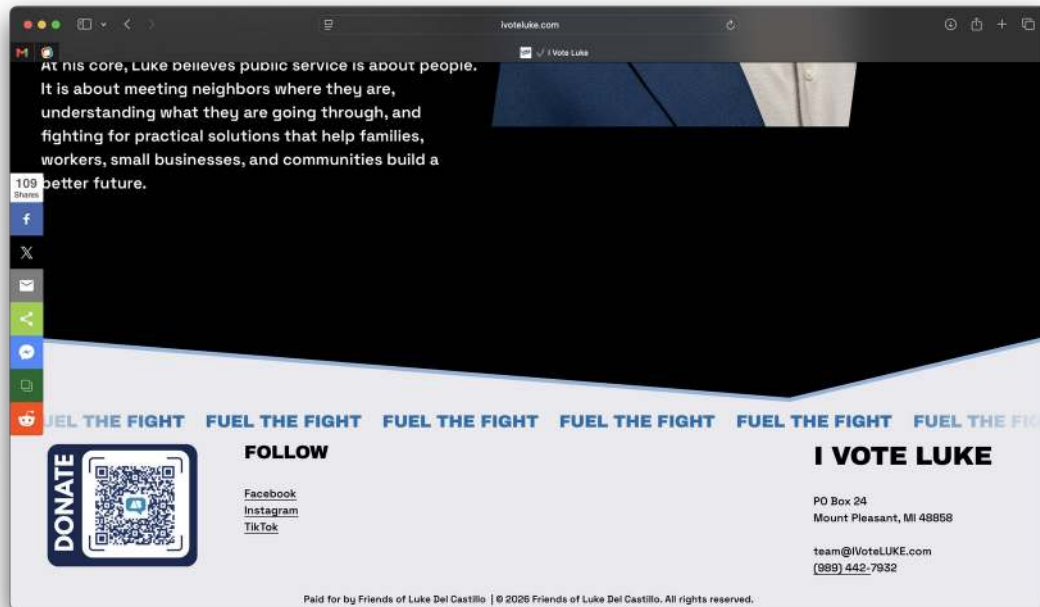
Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (campaign website screenshot); Exhibit B (ActBlue donation page screenshots)

EXHIBIT A

Screenshot of the ivoteluke.com campaign website, captured on or about August 31, 2026



Website footer showing the 'I VOTE LUKE' contact block (with the PO Box address) separated from the bottom bar's 'Paid for by Friends of Luke Del Castillo' statement, which includes no address

EXHIBIT B

Screenshots of the secure.actblue.com donation page for Luke Del Castillo, captured on or about August 31, 2026

This screenshot shows the top half of a donation page. At the top, there's a browser window with the URL 'secure.actblue.com'. Below the browser, a candidate photo of Luke Del Castillo is displayed. To the right of the photo, it says 'Secured by ActBlue'. Below the photo, the text reads 'Donate to Luke Del Castillo!'. A paragraph follows: 'Luke Del Castillo is running for State Representative in Michigan's 92nd District to fight for working families, strengthen local economies, support small businesses, and make sure rural and mid-Michigan communities have a real voice in Lansing.' Below this, it says 'Your contribution helps us knock doors, reach voters, host community events, and build a people-powered campaign rooted in listening, service, and common sense.' and 'Donate today to help send Luke to Lansing.' To the right of this text, there's a 'Choose an amount:' section. It says 'Your contribution will benefit Luke Del Castillo,' and has a 'Candidate' button. Below this are buttons for \$5, \$10, \$20, \$25, \$50, \$100, \$200, and a custom amount field. Below the amount buttons is a 'Make it monthly!' section. It says 'Your sustaining support allows us to create budgets and plan ahead!' and has two buttons: 'Yes, count me in!' and 'No, donate once' (which is selected). At the bottom of this section is a 'Checkout' button.

Upper portion of donation page with candidate photo and solicitation text

This screenshot shows the bottom half of the donation page. At the top, there's a 'Checkout' section. It says 'Have an ActBlue Express account? [Sign in to give faster.](#)' Below this are three payment options: 'Pay with card', 'Apple Pay', and 'Donate with Google Pay'. Below the payment options is a 'Contribution rules' section. It lists four rules: 1. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person. 2. I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder). 3. I am at least eighteen years old. 4. This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution. Below the rules, it says 'Americans living abroad may only contribute through ActBlue while physically in the United States. By proceeding with this transaction, you agree to ActBlue's [terms & conditions.](#)' At the bottom of the page, there's a disclaimer: 'Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, [click here.](#)'

Lower portion of donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Mary Cavanagh — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Mary Cavanagh

Committee: Not identified by name in the material reviewed

Office Sought: State Senate, District 6

Campaign/Donation Page(s) Reviewed: <https://secure.actblue.com/donate/committee-to-elect-mary-cavanagh-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee’s address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed a donation page hosted at <https://secure.actblue.com/donate/committee-to-elect-mary-cavanagh-1> titled “Donate to Senator Mary Cavanagh's Re-Election Campaign,” soliciting contributions to Mary Cavanagh, a candidate for State Senate, District 6. This express solicitation captioned “Donate to Senator Mary Cavanagh's Re-Election Campaign” directly calls on visitors to fund Mary Cavanagh's candidacy, constituting express advocacy for her election under *Golden v. Yahkind* and bringing the page within MCL 169.247's disclosure requirement. Its only funding-source disclosure is a footer notice stating that the platform itself is “paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” No statement identifying a campaign committee for the candidate, by name or address, appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

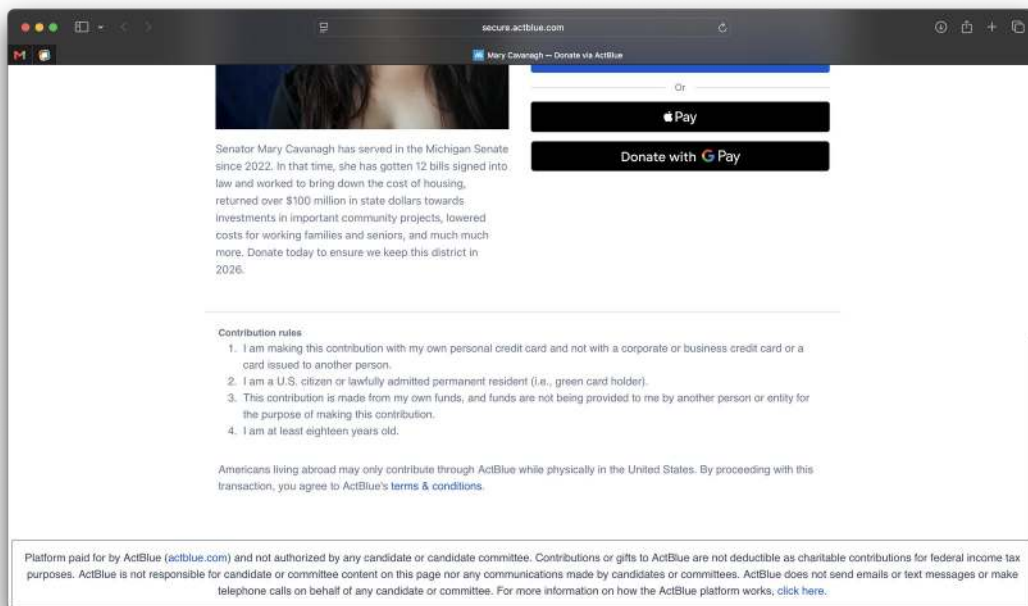
Enclosures: Exhibit A (donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Mary Cavanagh, captured on or about August 29, 2026



Upper portion of donation page



Lower portion of donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against John D. Cherry — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: John D. Cherry

Committee: Not identified by name in the material reviewed

Office Sought: State Senate, District 27

Campaign/Donation Page(s) Reviewed: cherryformichigan.com;
<https://secure.actblue.com/donate/supporters-of-john-cherry-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee’s address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. ActBlue Donation Page (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the ActBlue donation page located at <https://secure.actblue.com/donate/supporters-of-john-cherry-1>, captioned "John Cherry — Donate via ActBlue." The page prominently displays a boxed campaign graphic reading "JOHN" and, in large yellow block lettering, "CHERRY," with "FOR STATE SENATE" beneath it and a "☆ DEMOCRAT ☆" designation in the corner, under the heading "I'm running for Senate." The accompanying narrative describes the candidate's record "Serving Genesee County in the Michigan Senate" and states, "I'm running for reelection because our work isn't finished — and because I believe deeply in the future of this community we call home. If you share that belief, I'm asking you to stand with me... Can you chip in to help me start my campaign off right? Every dollar helps me get the word out to more people about our priorities and goals for Genesee County." A donation module states "Your contribution will benefit John Cherry" alongside preset contribution amounts (\$10, \$25, \$50, \$100). This content constitutes express advocacy soliciting contributions for Mr. Cherry's election to the Michigan Senate.

Notwithstanding this express advocacy, no "Paid for by [Committee], [Address]" statement identifying a sponsoring committee appears anywhere on the page, nor does any committee name of any kind appear in the material reviewed. The only disclosure of any kind is the generic boilerplate statement at the bottom of the page: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee." This is ActBlue's own standard platform disclaimer, not a disclosure by or on behalf of any Cherry campaign committee.

5. Requested Relief

- Investigate the facts alleged in this complaint;

- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

Printed Name: Vance Patrick

Date: August 31st, 2026

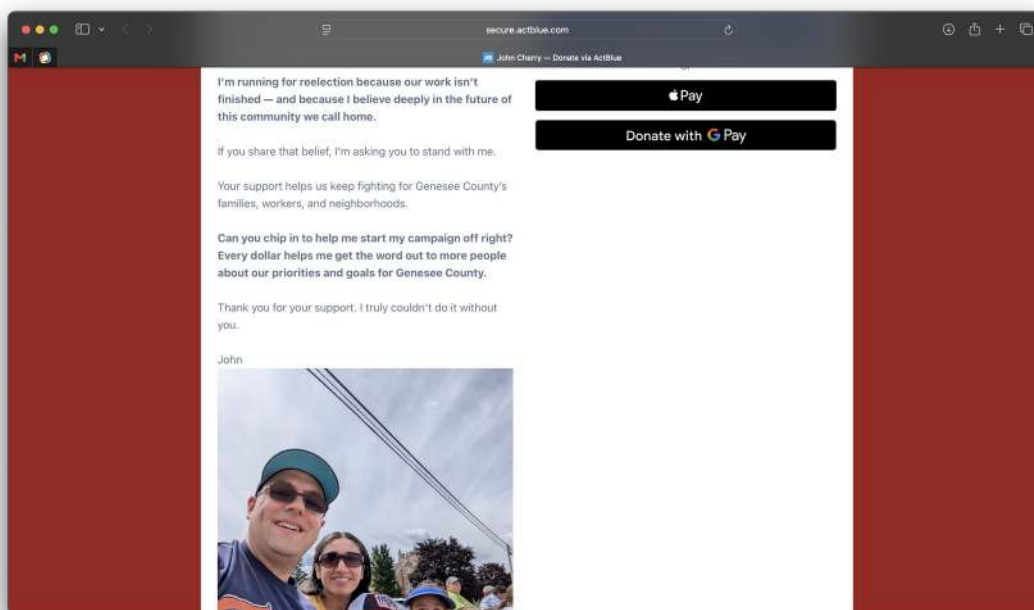
Enclosures: Exhibit A (ActBlue donation page screenshots)

EXHIBIT A

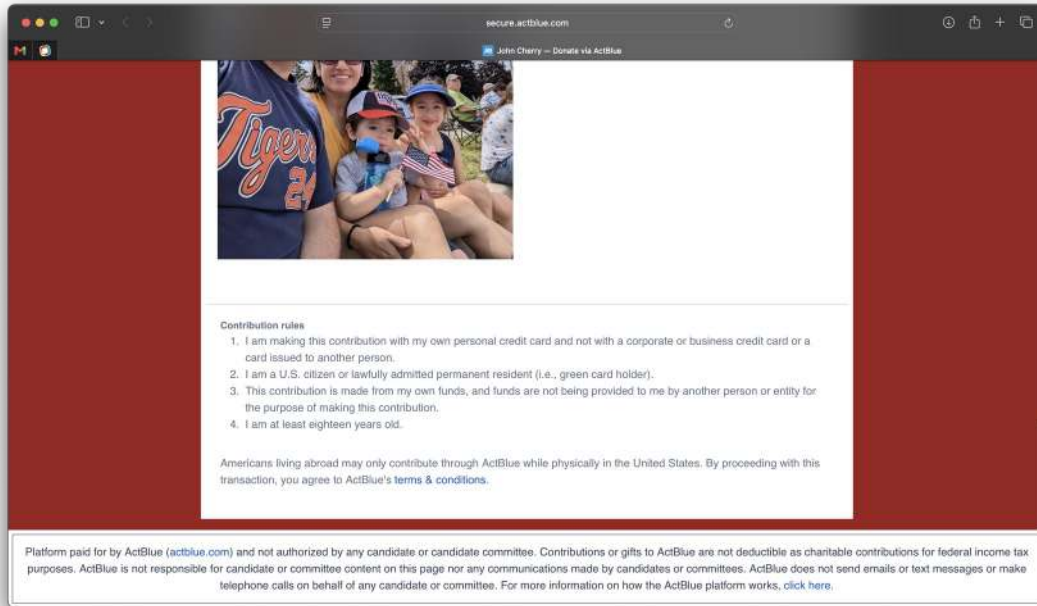
Screenshots of the secure.actblue.com donation page for John Cherry, captured on or about August 31, 2026



Upper portion of donation page — "JOHN CHERRY FOR STATE SENATE" campaign graphic and donation module



Middle/lower portion — solicitation letter ("Can you chip in...") and payment options



Bottom portion — only ActBlue's generic platform notice appears; no committee name or address is identified anywhere

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Jaime Churches — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Jaime Churches

Committee: Not identified by name in the material reviewed

Office Sought: State Representative, District 27

Campaign/Donation Page(s) Reviewed: <https://secure.actblue.com/donate/jc-web-2026> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed a donation page hosted at <https://secure.actblue.com/donate/jc-web-2026> titled "Support Jaime Churches for MI State Representative," soliciting contributions to Jaime Churches, a candidate for State Representative, District 27. This banner language, "Support Jaime Churches for MI State Representative," combines the candidate's name with express "for [Office]" campaign branding and a direct call to donate, satisfying the express advocacy standard of *Golden v. Yahkind* and bringing the page within MCL 169.247's disclosure requirement. Its only funding-source disclosure is a footer notice stating that the platform itself is "paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee." No statement identifying a campaign committee for the candidate, by name or address, appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

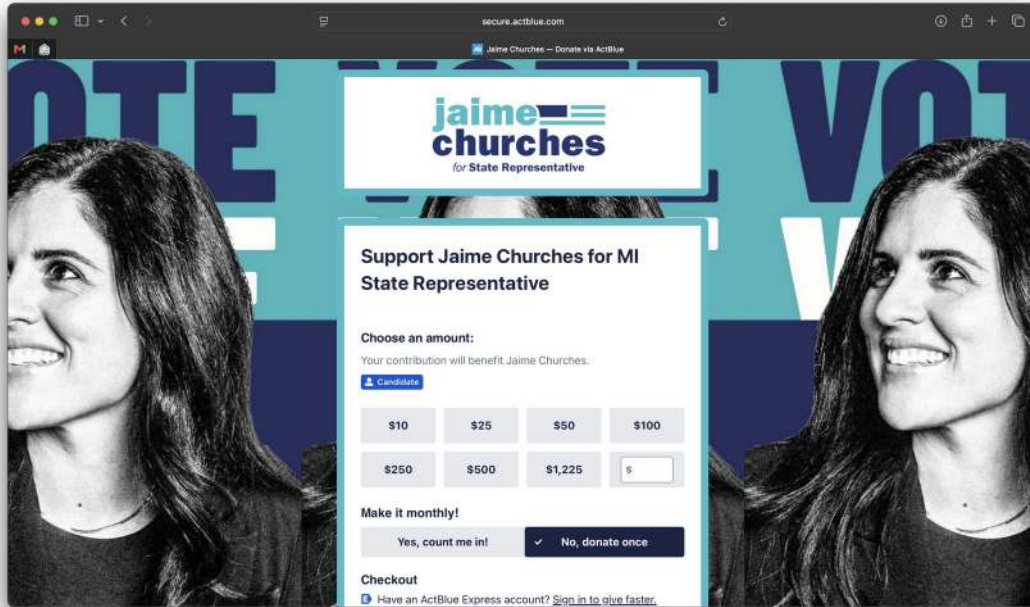
I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

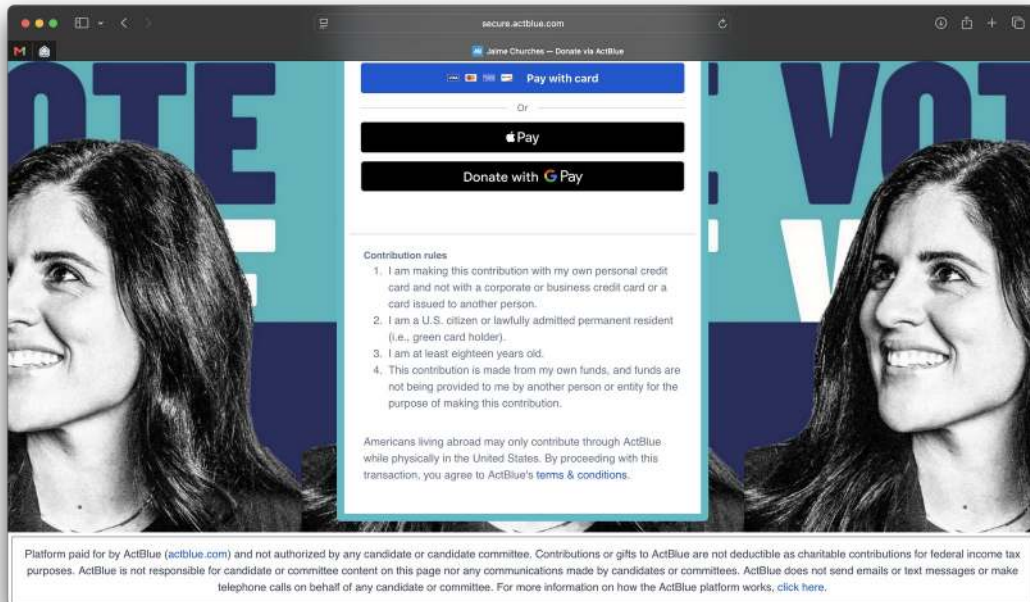
Enclosures: Exhibit A (donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Jaime Churches, captured on or about August 29, 2026



Upper portion of donation page



Lower portion of donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Betsy Coffia — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Betsy Coffia

Committee: CTE Betsy Coffia

Office Sought: State Representative, District 103

Campaign/Donation Page(s) Reviewed: betsycoffia.com; <https://secure.actblue.com/donate/betsy-coffia-2> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. ActBlue Donation Page (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the ActBlue donation page located at <https://secure.actblue.com/donate/betsy-coffia-2>, captioned "Betsy Coffia — Donate via ActBlue." The page displays a campaign graphic reading "BETSY Coffia FOR STATE REPRESENTATIVE" against a teal topographic background, under the heading "Re-Elect Betsy Coffia 2026." The accompanying text expressly advocates for Ms. Coffia's reelection, stating that "Northern Michigan deserves a progressive leader who will act with integrity, and work on behalf of ALL constituents," touting her record as "current State Representative," and concluding, "Let's work together and keep Betsy working for us in Lansing. Let's re-elect the leader we deserve!" A donation module states "Your contribution will benefit Betsy Coffia" alongside preset contribution amounts.

The page also states: "If you would like to contribute with a check you can make it out to 'CTE Betsy Coffia' and mail it to: P.O. BOX 54, Acme, MI 49690." This passage does identify a committee name ("CTE Betsy Coffia") together with a mailing address. However, it does not function as the identification statement required by MCL 169.247(1); it is presented solely as payment-routing instructions for check contributions, introduced by "If you would like to contribute with a check you can make it out to," and is not styled, captioned, or presented anywhere on the page as a "Paid for by [Committee], [Address]" disclosure. No statement using "Paid for by" or substantially similar language appears anywhere in the material reviewed. The only other disclosure-type language on the page is the generic boilerplate ActBlue statement at the bottom: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee..." — which is ActBlue's own standard platform notice, not a disclosure specific to the Coffia committee.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;

- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

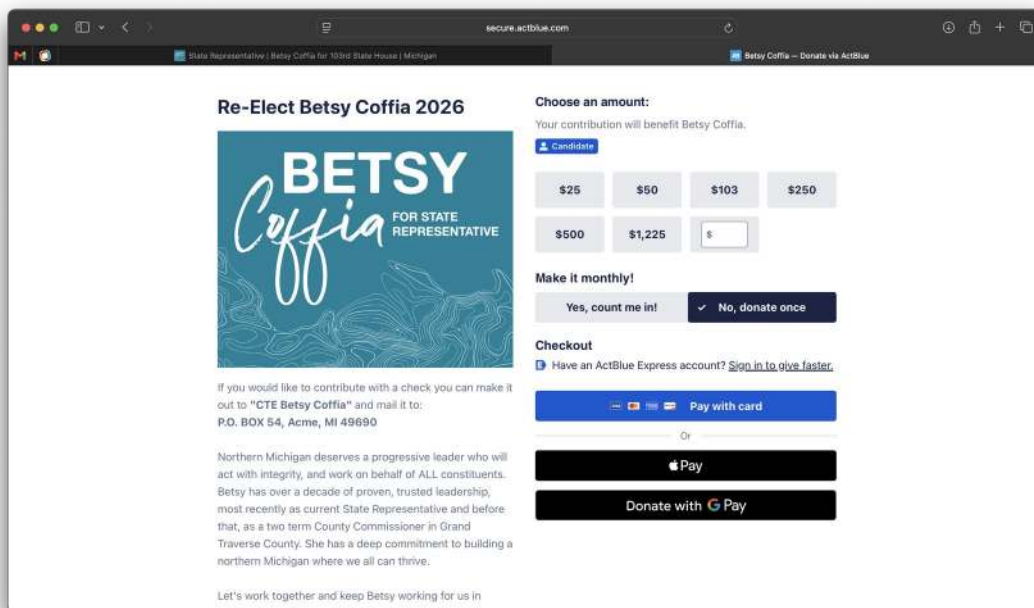
Printed Name: Vance Patrick

Date: August 31st, 2026

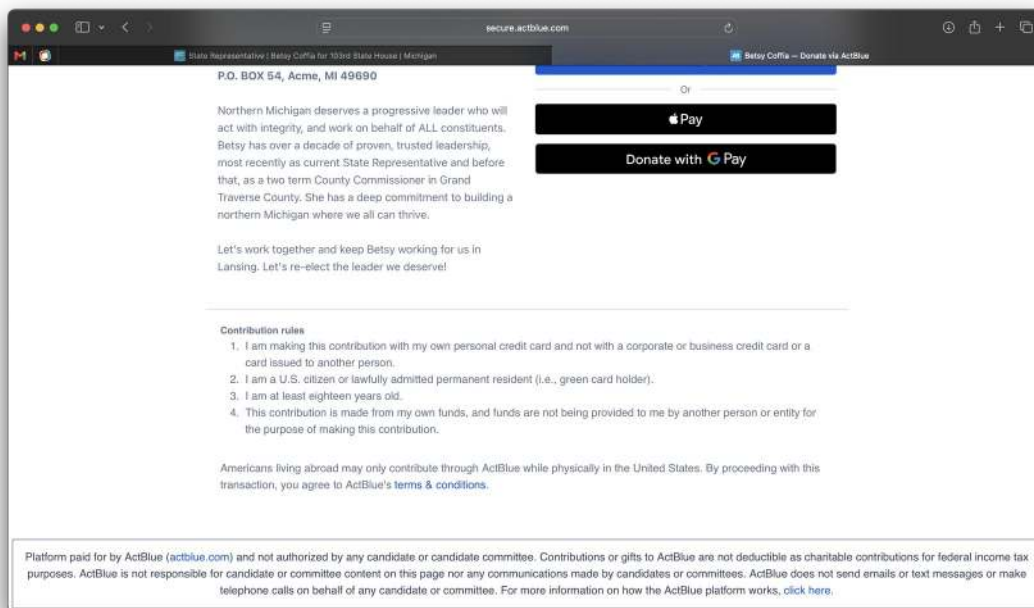
Enclosures: Exhibit A (ActBlue donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Betsy Coffia, captured on or about August 31, 2026



Upper portion — "Re-Elect Betsy Coffia 2026" campaign graphic and "make [check] out to 'CTE Betsy Coffia'... P.O. BOX 54, Acme, MI 49690" check-mailing instruction



Lower portion — only ActBlue's generic platform notice appears; no unified committee "Paid for by" statement

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Jennifer A. Conlin — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Jennifer A. Conlin

Committee: Jennifer Conlin for State Representative (named only as payee for mailed checks; no “Paid for by” statement naming a committee appears on the page)

Office Sought: State Representative, District 48

Campaign/Donation Page(s) Reviewed: <https://secure.actblue.com/donate/jennifer-conlin-for-state-representative-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee’s address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible,

and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed a donation page hosted at <https://secure.actblue.com/donate/jennifer-conlin-for-state-representative-1> titled “Support Jennifer Conlin for Michigan State Representative! Donate today.”, soliciting contributions to Jennifer Conlin, a candidate for State Representative, District 48. The page's body text states, “You may also donate by sending a check addressed to Jennifer Conlin for State Representative, PO Box 131106, Ann Arbor, MI 48113,” but this sentence is instructions for mailing a paper check, not a “Paid for by” funding-source disclosure, and no such disclosure naming a committee appears anywhere near it. The only funding-source disclosure on the page is a footer notice stating that the platform itself is “Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” This heading, “Support Jennifer Conlin for Michigan State Representative! Donate today,” pairs the candidate's name with “for [Office]” branding and an explicit call to action to donate, together constituting express advocacy for her election under *Golden v. Yahkind* and bringing the page within MCL 169.247's disclosure requirement.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Jennifer Conlin, captured on or about August 29, 2026

The screenshot shows the top half of a donation page in a web browser. The browser's address bar shows 'secure.actblue.com' and the page title is 'Jennifer Conlin - Donate via ActBlue'. The main heading is 'Support Jennifer Conlin for Michigan State Representative! Donate today.' Below this is a paragraph of text: 'Thank you for supporting Jennifer Conlin for State Representative! Your contribution today will help my 2026 re-election campaign and ensure we regain majority in Michigan's House of Representatives next year.' This is followed by another paragraph: 'The maximum donation allowed this year is \$1225 per individual, and we would love it if you are able to donate that amount or add to a previous smaller amount you may have donated (thank you!) to help me reach my goal. One of the easiest ways to contribute is with a monthly, recurring small donation. Every donation helps, and we appreciate any amount of support you are able to give!' Below this is a paragraph: 'You may also donate by sending a check addressed to Jennifer Conlin for State Representative, PO Box 131106, Ann Arbor, MI 48113.' To the right of the text is a 'Choose an amount:' section with a 'Candidate' label and a list of donation amounts: \$10, \$25, \$50, \$100, \$500, and \$1,225. There is also a 'Make it monthly!' section with two buttons: 'Yes, count me in!' and 'No, donate once'. Below this is a 'Checkout' section with a link to 'Sign in to give faster' and three payment options: 'Pay with card', 'Apple Pay', and 'Donate with G Pay'. At the bottom left, there is a 'Contribution rules' section with a single rule: '1. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person.'

Support Jennifer Conlin for Michigan State Representative! Donate today.

Thank you for supporting Jennifer Conlin for State Representative! Your contribution today will help my 2026 re-election campaign and ensure we regain majority in Michigan's House of Representatives next year.

The maximum donation allowed this year is \$1225 per individual, and we would love it if you are able to donate that amount or add to a previous smaller amount you may have donated (thank you!) to help me reach my goal. One of the easiest ways to contribute is with a monthly, recurring small donation. Every donation helps, and we appreciate any amount of support you are able to give!

You may also donate by sending a check addressed to Jennifer Conlin for State Representative, PO Box 131106, Ann Arbor, MI 48113.

Choose an amount:

Your contribution will benefit Jennifer Conlin.

Candidate

\$10 \$25 \$50 \$100

\$500 \$1,225

Make it monthly!

Yes, count me in! ☒ No, donate once

Checkout

Have an ActBlue Express account? [Sign in to give faster.](#)

Pay with card

Or

Apple Pay

Donate with G Pay

Contribution rules

1. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person.

Upper portion of donation page, including check-mailing address given for an unrelated purpose

The screenshot shows the bottom half of the same donation page. It continues the text from the previous section: 'that amount or add to a previous smaller amount you may have donated (thank you!) to help me reach my goal. One of the easiest ways to contribute is with a monthly, recurring small donation. Every donation helps, and we appreciate any amount of support you are able to give!' This is followed by the same paragraph about sending a check: 'You may also donate by sending a check addressed to Jennifer Conlin for State Representative, PO Box 131106, Ann Arbor, MI 48113.' Below this is the same 'Checkout' section with the 'Sign in to give faster' link and the three payment options: 'Pay with card', 'Apple Pay', and 'Donate with G Pay'. The 'Contribution rules' section now lists four rules: '1. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person.', '2. I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder).', '3. I am at least eighteen years old.', and '4. This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution.' Below the rules is a paragraph: 'Americans living abroad may only contribute through ActBlue while physically in the United States. By proceeding with this transaction, you agree to ActBlue's [terms & conditions](#).' At the very bottom, there is a small disclaimer: 'Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, [click here](#).'

that amount or add to a previous smaller amount you may have donated (thank you!) to help me reach my goal. One of the easiest ways to contribute is with a monthly, recurring small donation. Every donation helps, and we appreciate any amount of support you are able to give!

You may also donate by sending a check addressed to Jennifer Conlin for State Representative, PO Box 131106, Ann Arbor, MI 48113.

Checkout

Have an ActBlue Express account? [Sign in to give faster.](#)

Pay with card

Or

Apple Pay

Donate with G Pay

Contribution rules

1. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person.
2. I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder).
3. I am at least eighteen years old.
4. This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution.

Americans living abroad may only contribute through ActBlue while physically in the United States. By proceeding with this transaction, you agree to ActBlue's [terms & conditions](#).

Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, [click here](#).

Lower portion of donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against John Conyers III — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: John Conyers III

Committee: Friends of John Conyers

Office Sought: State Senate, District 3

Campaign/Donation Page(s) Reviewed: voteconyers.com; <https://secure.actblue.com/donate/conyers-web> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed the website located at voteconyers.com for John Conyers III, a candidate for State Senate, District 3. The footer of the page contains a paragraph reading, “If donating by mail, make checks payable to: Friends of John Conyers, 2727 W 7 Mile Rd | Detroit, MI 48221.” Set apart from that paragraph, in its own bordered box, is a separate statement reading only “Paid for by Friends of John Conyers,” with no address included in that statement. The only street address appearing on the page is thus part of instructions for mailing a paper check, not part of the “Paid for by” funding-source disclosure itself.

B. Linked Donation Page (Exhibit B)

Complainant's designee also accessed a linked donation page hosted at <https://secure.actblue.com/donate/conyers-web> titled “Donate to John Conyers III!,” soliciting contributions for John Conyers III's campaign for Michigan State Senate, District 3. This caption, “Donate to John Conyers III!,” is a direct call to action soliciting financial support for his campaign for State Senate, constituting express advocacy for his election under *Golden v. Yahkind* and bringing the page within MCL 169.247's disclosure requirement. Its only funding-source disclosure is a footer notice stating that the platform itself is “paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” No statement identifying a campaign committee for the candidate, by name or address, appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and

- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

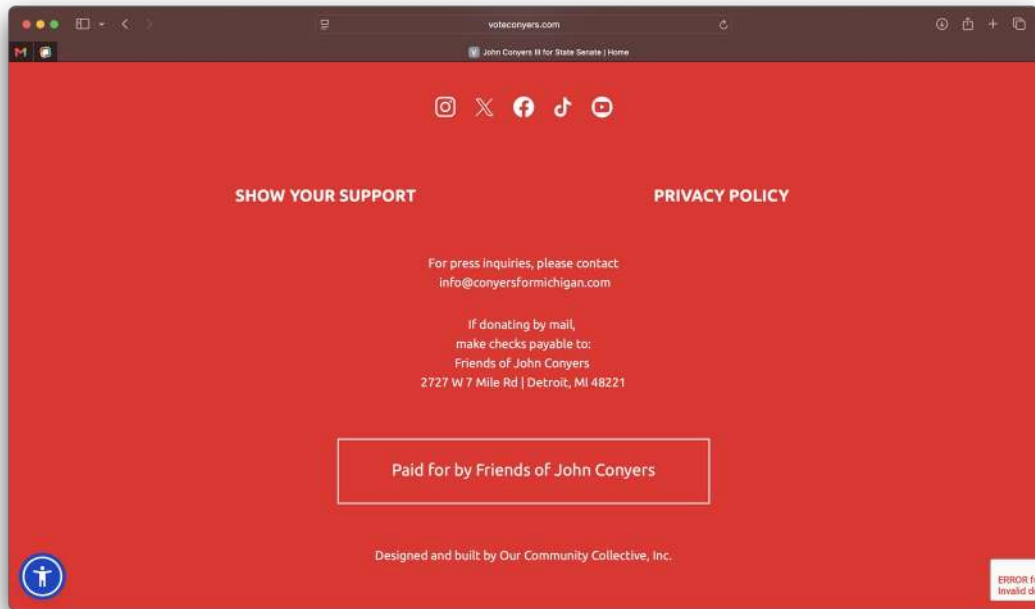
Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (website screenshot); Exhibit B (donation page screenshots)

EXHIBIT A

Screenshot of the voteconyers.com footer, captured on or about August 29, 2026



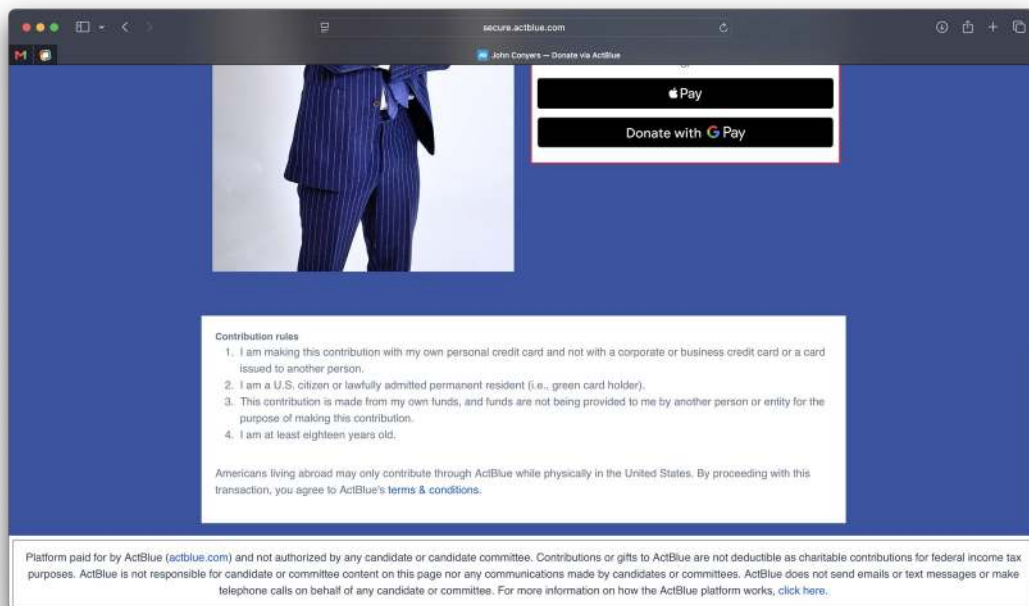
Website footer — “Paid for by” statement and mailing address appear in separate blocks

EXHIBIT B

Screenshots of the *secure.actblue.com* donation page for John Conyers III, captured on or about August 29, 2026



Upper portion of donation page



Lower portion of donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Angel Coon — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrikmi@gmail.com

2. Respondent Information

Candidate: Angel Coon

Committee: Committee to Elect Angel Coon

Office Sought: State Representative, District 102

Campaign/Donation Page(s) Reviewed: electangelcoon.com;
<https://secure.actblue.com/donate/electangelcoon> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the website located at electangelcoon.com for Angel Coon, captioned "Angel Coon for Michigan House." The page expressly solicits campaign contributions, stating "MAKE AN IMPACT TODAY... When you give, you invest in progress, compassion, and a better world for everyone," accompanied by a graphic captioned "CLICK BELOW... EVERY DOLLAR COUNTS" and a QR code bearing the ActBlue logo that routes viewers to a donation page. The page's footer bears the headline "PROTECTING RIGHTS EARNING TRUST" and identifies the site as "Angel Coon for Michigan State Representative – District 102" — express campaign branding and a direct solicitation of donations, both of which constitute express advocacy for Ms. Coon's election.

The same footer contains the statement "Paid for by Committee to Elect Angel Coon." This identifies a committee name, but no street or mailing address accompanies it anywhere on the page — the statement consists of the committee name alone. As such, this disclosure does not satisfy MCL 169.247(1), which requires that the committee name and its address appear together as a single, self-contained statement.

B. ActBlue Donation Page (Exhibit B)

On or about Monday, August 31, 2026, Complainant's designee accessed the ActBlue donation page located at <https://secure.actblue.com/donate/electangelcoon>, captioned "Angel Coon — Donate via ActBlue." The page displays a campaign logo reading "ELECT ANGEL COON for Michigan House District 102" superimposed on an outline of the state of Michigan, under the heading "Join the Movement & Help Fuel this Campaign!" The accompanying text states, "Pitch in today to support the efforts to Elect Angel Coon for Michigan House of Representatives - District 102. Together, we can move our community forward" — an express solicitation of contributions for Ms. Coon's election. A donation module states "Your contribution will benefit Angel Coon" alongside preset contribution amounts.

No "Paid for by" statement of any kind — whether naming the committee, an address, or both — appears anywhere on the ActBlue donation page. The only disclosure-type language on the page is the generic

boilerplate statement at the bottom: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee..." This is ActBlue's own standard platform disclaimer and does not identify or reference the Committee to Elect Angel Coon or any address.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

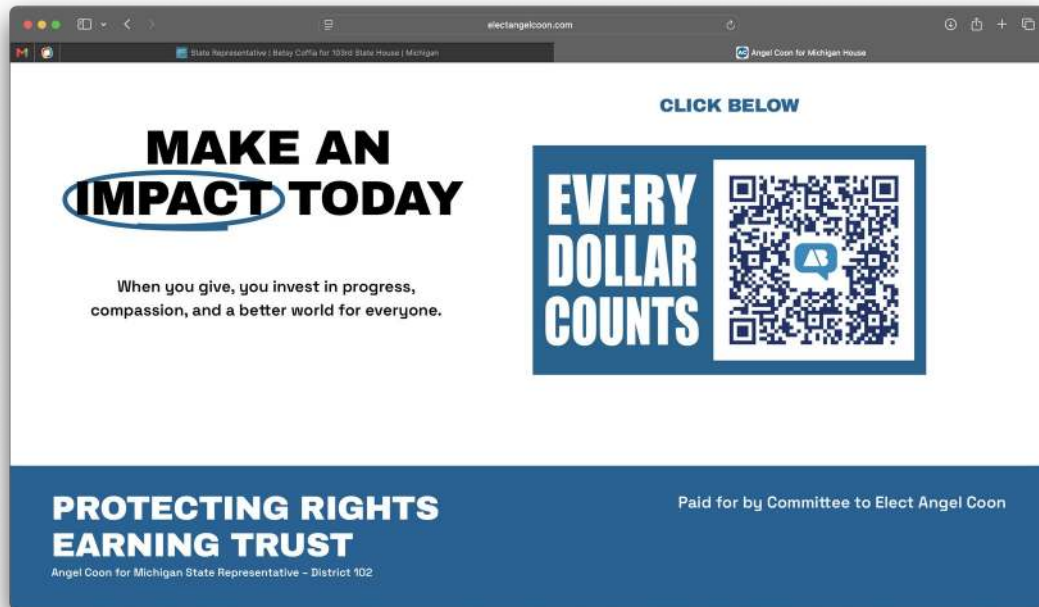
Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (campaign website screenshot); Exhibit B (ActBlue donation page screenshots)

EXHIBIT A

Screenshot of the electangelcoon.com campaign website, captured on or about August 31, 2026



Campaign website — donation solicitation and QR code; footer states "Paid for by Committee to Elect Angel Coon" with no accompanying address

EXHIBIT B

Screenshots of the secure.actblue.com donation page for Angel Coon, captured on or about August 31, 2026

The screenshot shows the top half of a web browser window displaying the donation page for Angel Coon. The browser's address bar shows secure.actblue.com and the page title is "Angel Coon - Donate via ActBlue". A "Secured by ActBlue" badge is in the top right corner. The main content area features the "ELECT ANGEL COON" campaign logo, which includes a map of Michigan and the text "for Michigan House District 102". Below the logo, the text reads: "Join the Movement & Help Fuel this Campaign! Pitch in today to support the efforts to Elect Angel Coon for Michigan House of Representatives - District 102. Together, we can move our community forward." To the right, under the heading "Choose an amount:", it says "Your contribution will benefit Angel Coon." There is a "Candidate" button and a grid of donation amount buttons: \$5, \$10, \$20, \$25, \$50, \$100, \$200, and a custom amount field with a dollar sign. Below this, the "Make it monthly!" section states "Your sustaining support allows us to create budgets and plan ahead!" and has two buttons: "Yes, count me in!" and "No, donate once" (which is selected). At the bottom of this section is a "Checkout" link.

Upper portion of donation page — "ELECT ANGEL COON" campaign logo and solicitation text

The screenshot shows the bottom half of the same web browser window. The "Checkout" section is visible, starting with the question "Have an ActBlue Express account? [Sign in to give faster.](#)". Below this are three payment options: "Pay with card" (with a credit card icon), "Pay" (with the Apple Pay logo), and "Donate with Google Pay" (with the Google Pay logo). A horizontal line separates this from the "Contribution rules" section, which lists four numbered items: 1. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person. 2. I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder). 3. I am at least eighteen years old. 4. This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution. Below the rules, a note states: "Americans living abroad may only contribute through ActBlue while physically in the United States. By proceeding with this transaction, you agree to ActBlue's [terms & conditions](#)." At the very bottom, a small disclaimer reads: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, [click here](#)."

Lower portion — only ActBlue's generic platform notice appears; no committee-specific disclosure

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Jenn Cornell — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Jenn Cornell

Committee: Not identified by name in the material reviewed

Office Sought: Ann Arbor City Council, Ward 5

Campaign/Donation Page(s) Reviewed: <https://secure.actblue.com/donate/reelectjenn> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate’s name with campaign branding — typically a logo or banner pairing the candidate’s name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate’s campaign. Material of that character is express advocacy for the candidate’s election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247’s reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Saturday, August 29, 2026, Complainant’s designee accessed a donation page hosted at <https://secure.actblue.com/donate/reelectjenn> soliciting contributions to “Re-elect Jenn Cornell for City Council,” captioned “Help Re-elect Jenn Cornell for Ward 5 City Council!” The page states that the contribution “will benefit Jennifer Cornell” but nowhere identifies any campaign committee by name. This caption, “Help Re-elect Jenn Cornell for Ward 5 City Council!”, combines the candidate’s name with “for [Office]” branding and an explicit call to action to re-elect her, constituting express advocacy for her election under *Golden v. Yahkind* and bringing the page within MCL 169.247’s disclosure requirement.

The lower portion of the page contains only ActBlue’s generic platform notice, stating that the page is “Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” No statement identifying a committee for Jenn Cornell, by name or address, appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent’s campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

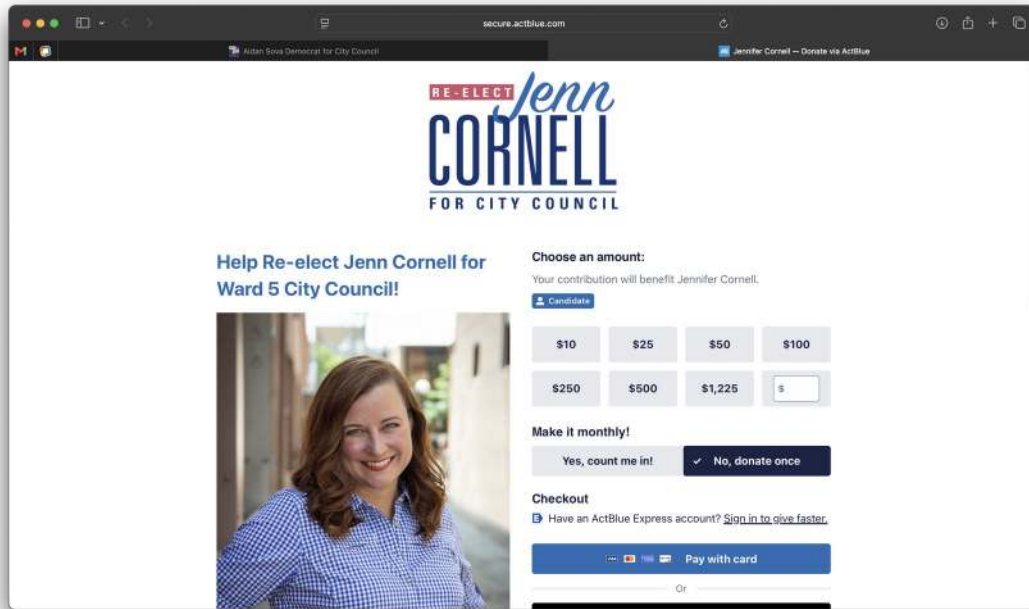
I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

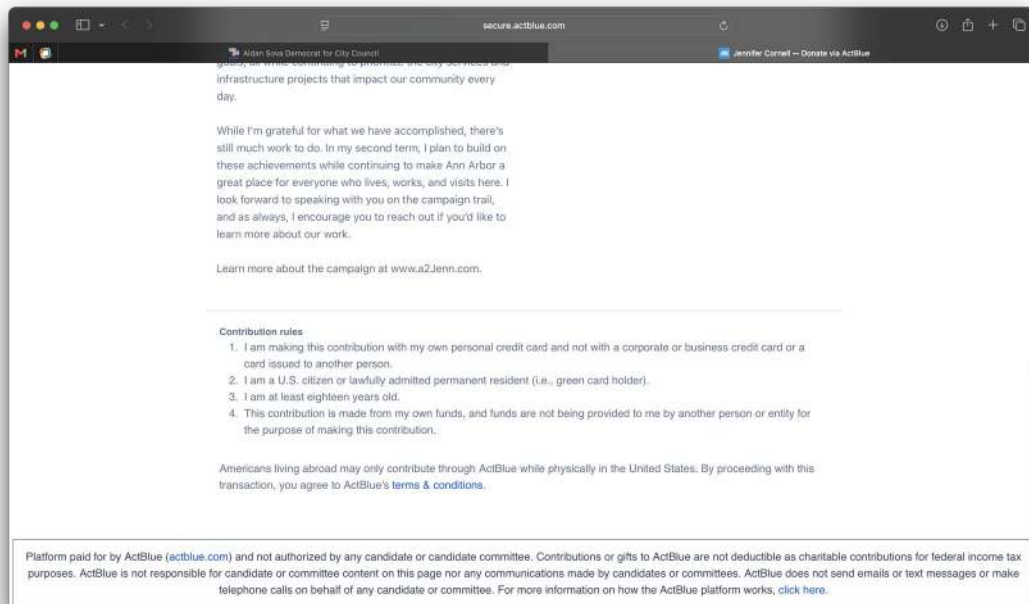
Enclosures: Exhibit A (donation page screenshots)

EXHIBIT A

Screenshots of the *secure.actblue.com* donation page for Jenn Cornell, captured on or about August 29, 2026



Upper portion of donation page — no committee or address named



Lower portion of donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Darian Counts — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Darian Counts

Committee: Counts for State Rep

Office Sought: State Representative, District 29

Campaign/Donation Page(s) Reviewed: dariancounts.com; <https://secure.actblue.com/donate/darian-counts-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed the website located at dariancounts.com for Darian Counts, a candidate for State Representative, District 29. The footer of the homepage states “Built in Detroit. Paid for by Counts for State Rep.” No mailing address for the committee appears anywhere on the page — the footer contains only navigation links and a “VOTE COUNTS 2026” tagline. This “VOTE COUNTS 2026” tagline is a direct call to action urging votes for the candidate by name, constituting express advocacy for Darian Counts's election under *Golden v. Yahkind* and bringing the page within MCL 169.247's disclosure requirement.

B. Linked Donation Page (Exhibit B)

Complainant's designee also accessed a linked donation page hosted at <https://secure.actblue.com/donate/darian-counts-1> soliciting contributions to Darian Counts. Its only funding-source disclosure is a footer notice stating that the platform itself is “paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” No statement identifying a campaign committee for the candidate, by name or address, appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

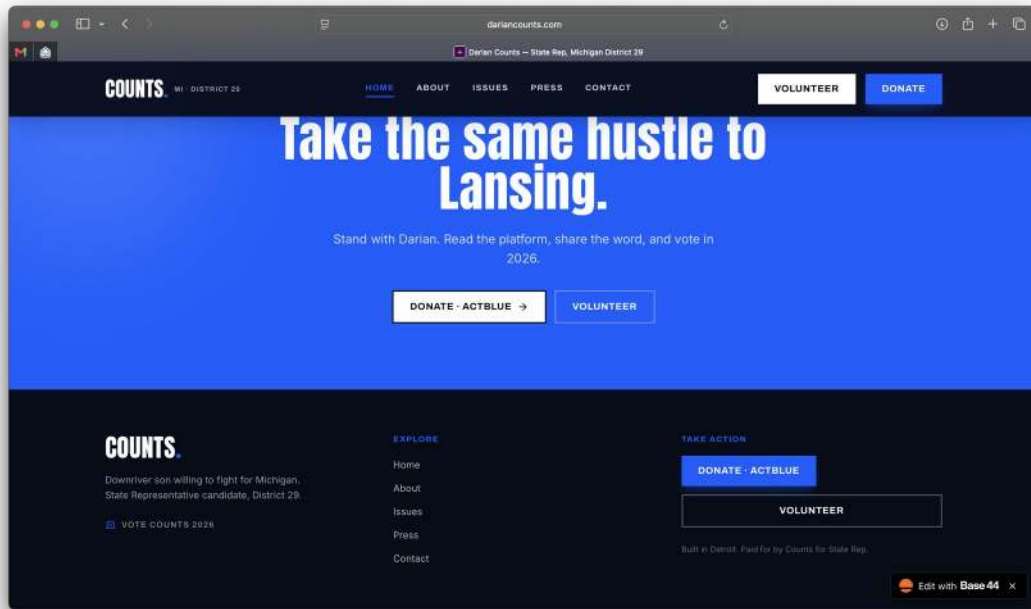
Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (website screenshot); Exhibit B (donation page screenshots)

EXHIBIT A

Screenshot of the dariancounts.com homepage and footer, captured on or about August 29, 2026



Website homepage and footer — committee named but no address given

EXHIBIT B

Screenshots of the secure.actblue.com donation page for Darian Counts, captured on or about August 29, 2026

This screenshot shows the top half of a donation page. On the left, under the heading "Donate to Darian Counts!", there is a short paragraph encouraging support for Darian Counts for State Representative. On the right, the "Choose an amount:" section offers a "Candidate" button and a grid of preset donation amounts: \$5, \$10, \$20, \$25, \$50, \$100, \$200, and a custom input field. Below this, the "Make it monthly!" section includes a text box for recurring amounts and two buttons: "Yes, count me in!" and "No, donate once". The "Checkout" section prompts users to sign in for a faster experience and provides three payment options: "Pay with card", "Apple Pay", and "Donate with Google Pay". A "Secured by ActBlue" badge is visible in the top right corner.

Upper portion of donation page

This screenshot shows the bottom half of the donation page. The "Checkout" section is repeated, showing the same payment options as the upper portion. Below this, the "Contribution rules:" section lists four numbered conditions for making a contribution. Further down, a notice states that Americans living abroad may only contribute through ActBlue while physically in the United States. At the very bottom, a small disclaimer box explains that the platform is paid for by ActBlue and is not authorized by any candidate or committee, and that contributions are not deductible for federal income tax purposes.

Lower portion of donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Christopher R. Crain — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Christopher R. Crain

Committee: Christopher Crain for State Representative

Office Sought: State Representative, District 101

Campaign/Donation Page(s) Reviewed: chrisformi101.com

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the website located at chrisformi101.com for Christopher Crain, captioned "Christopher Crain." The homepage expressly solicits campaign contributions under the heading "Support the Campaign," stating, "Chip in to help support Chris's campaign and keep momentum going," accompanied by a graphic depicting an "I Voted" sticker and a "Contact & Donate" call-to-action button. The site's navigation bar and footer likewise repeat links labeled "Home," "About"/"Meet Chris," "Policies"/"View Policies," and "Contact & Donate," all directing visitors toward the donation solicitation. This content constitutes express advocacy for Mr. Crain's election.

The footer of the page states "Paid for by Christopher Crain for State Representative." This identifies a committee name, but no street or mailing address accompanies it anywhere on the page — no address for the committee appears anywhere in the material reviewed. As such, this statement does not satisfy MCL 169.247(1), which requires the committee name and its address to appear together as a single, self-contained statement.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

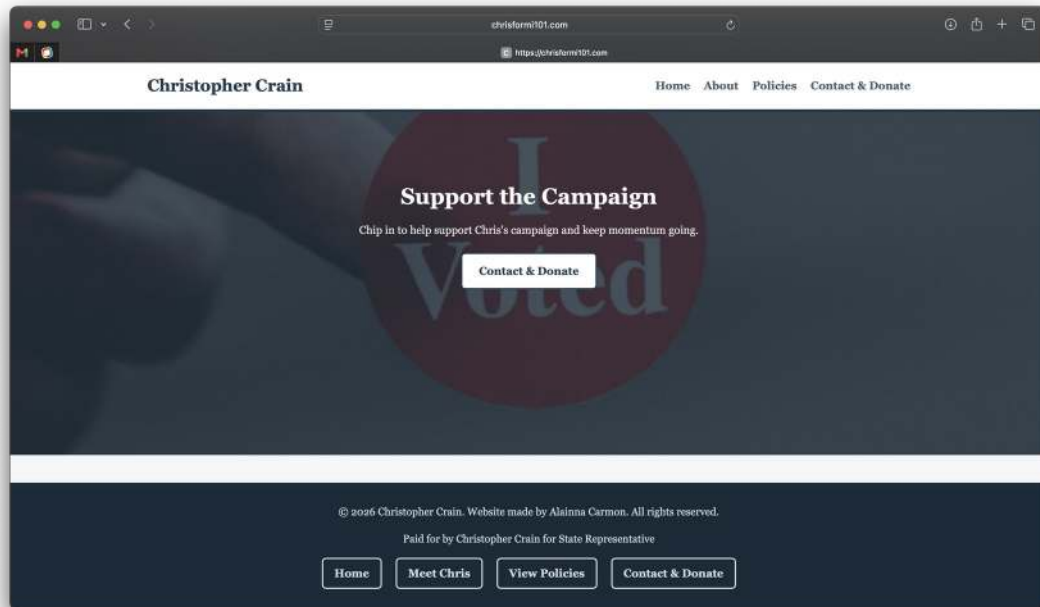
Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (campaign website screenshot)

EXHIBIT A

Screenshot of the chrisformi101.com campaign website, captured on or about August 31, 2026



Campaign homepage/footer — "Support the Campaign" solicitation and "Paid for by Christopher Crain for State Representative" statement with no accompanying address

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Rachel Crowther — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Rachel Crowther

Committee: Not identified by name in the material reviewed

Office Sought: State Representative, District 90

Campaign/Donation Page(s) Reviewed: rachelcrowthermi.com;
<https://secure.actblue.com/donate/rachelcrowthermi> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. ActBlue Donation Page (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the ActBlue donation page located at <https://secure.actblue.com/donate/rachelcrowthermi>, captioned "Rachel Crowther — Donate via ActBlue." The page displays a campaign banner photograph of Ms. Crowther against an American flag backdrop bearing the text "Rachel Crowther for State Representative District 90," and, further down the page, a repeated banner graphic reading "Your Voice / Your Values / Your Representative." The page's heading states, "Together, We Can Elect Rachel Crowther for State Representative," and a fundraising thermometer states "\$8,365 Raised... GOAL \$10,000... Donate to Rachel Crowther for State Representative!" The accompanying narrative states, "This campaign is powered by people, not corporations or special interests... Every dollar helps us reach more voters, share our message, and build the grassroots campaign we need to win." This content constitutes express advocacy soliciting contributions for Ms. Crowther's election.

No "Paid for by [Committee], [Address]" statement appears anywhere on the page. While the phrase "Rachel Crowther for State Representative" appears repeatedly as campaign branding, it is never presented as, or paired with, a formal committee disclosure or address, and no committee name is identified as such anywhere in the material reviewed. The only disclosure-type language on the page is the generic boilerplate statement at the bottom: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee..." This is ActBlue's own standard platform disclaimer, not a disclosure by or on behalf of any Crowther campaign committee.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and

- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

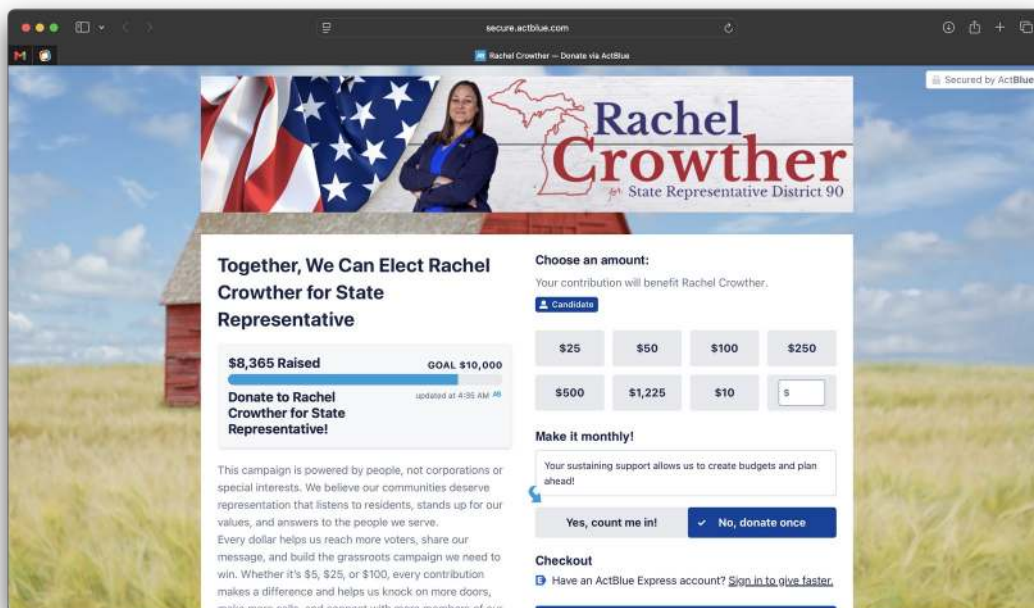
Printed Name: Vance Patrick

Date: August 31st, 2026

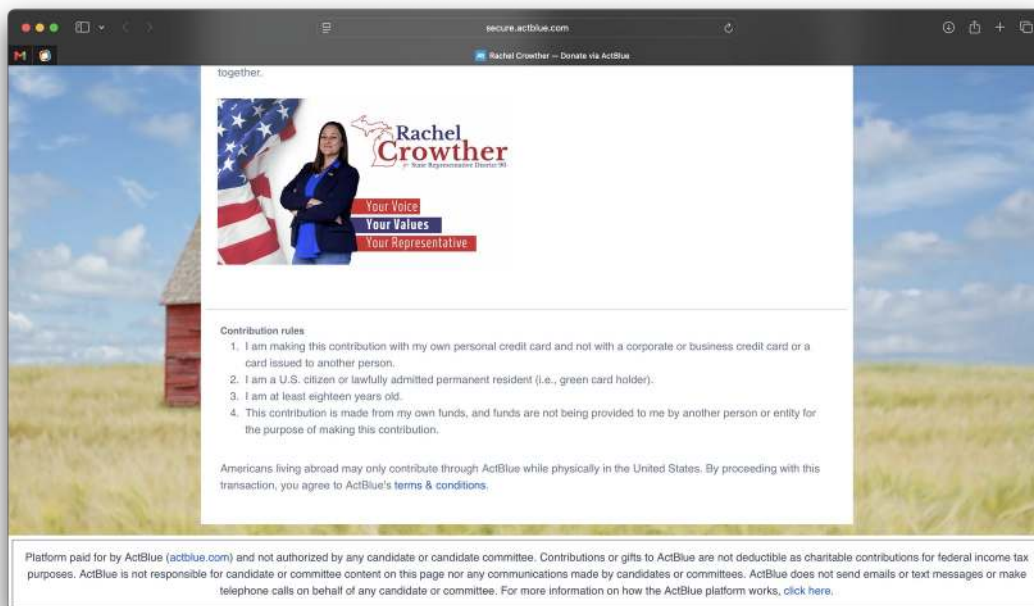
Enclosures: Exhibit A (ActBlue donation page screenshots)

EXHIBIT A

Screenshots of the *secure.actblue.com* donation page for Rachel Crowther, captured on or about August 31, 2026



Upper portion of donation page — campaign banner and fundraising thermometer



Lower portion — only ActBlue's generic platform notice appears; no committee-specific "Paid for by" statement

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Emily Dievendorf — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Emily Dievendorf

Committee: Friends of Emily Dievendorf

Office Sought: State Representative, District 77

Campaign/Donation Page(s) Reviewed: emilydievendorf.com;
<https://secure.actblue.com/donate/repemilydievendorf> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee’s address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. ActBlue Donation Page (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the ActBlue donation page located at <https://secure.actblue.com/donate/repemilydievendorf>, captioned "Emily Dievendorf — Donate via ActBlue." The page displays a large campaign wordmark reading "EMILY DIEVENDORF FOR STATE REPRESENTATIVE" above a solicitation letter from the candidate, under the heading "Donate to Friends of Emily Dievendorf." The letter states, "Here we are. I am now in my second term in the Michigan House and I feel so much gratitude," and calls on supporters with language such as "We as a community want and demand better... Thank you for all you do and for the support you give me. In solidarity, we move forward together." A donation module states "Your contribution will benefit Emily Dievendorf" alongside preset contribution amounts. This content constitutes express advocacy related to Ms. Dievendorf's candidacy.

Further down the page, within the same block of text as the ActBlue "Contribution rules," the page states: "All contributions are made directly to: Friends of Emily Dievendorf, PO Box 16026 Lansing, MI 48901." This passage does present a committee name together with a mailing address in a single, unbroken block — the closest any of the material reviewed for this candidate comes to the statutory disclosure. However, it is not captioned or styled as a "Paid for by" statement; it is introduced instead by "All contributions are made directly to:" and is presented as a payment-routing disclosure alongside the standard ActBlue contribution rules, rather than as the express "Paid for by [Committee], [Address]" identification required by MCL 169.247(1). No language using "Paid for by" or substantially similar phrasing appears anywhere on the page. The only other disclosure on the page is the generic ActBlue boilerplate: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee...."

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;

- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (ActBlue donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Emily Dievendorf, captured on or about August 31, 2026

EMILY
DIEVENDORF
FOR STATE REPRESENTATIVE

Donate to Friends of Emily Dievendorf

Hello Friends -

Here we are. I am now in my second term in the Michigan House and I feel so much gratitude. I want to thank you for who you are and who we have been as a community since I first took on this job.

We as a community want and demand better. We are bolder than the norm and thank goodness, because the world needs unapologetic progress. The people are rising up and demanding courage, ethics, transparency and accountability. We are holding the line on the humane treatment of our neighbors. We are fighting for a true representative democracy where the people, not billionaires, steer our priorities and where fairness exists.

Choose an amount:
Your contribution will benefit Emily Dievendorf.

[Candidate](#)

\$25 \$100 \$250 \$1,000

\$

Make it monthly!

Yes, count me in! ☒ No, donate once

Checkout

Have an ActBlue Express account? [Sign in to give faster.](#)

[Pay with card](#)

Upper portion — "EMILY DIEVENDORF FOR STATE REPRESENTATIVE" wordmark and solicitation letter

know our message and vision will resonate with our neighbors. We just have to get the message out there.

More and better, that's the bare minimum. It is who we are and what we bring. We make a great team and we aren't going anywhere.

Thank you for all you do and for the support you give me. In solidarity, we move forward together.

Contribution rules

1. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person.
2. I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder).
3. I am at least eighteen years old.
4. This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution.

All contributions are made directly to:
Friends of Emily Dievendorf
PO Box 16026 Lansing, MI 48901

Americans living abroad may only contribute through ActBlue while physically in the United States. By proceeding with this transaction, you agree to ActBlue's [terms & conditions](#).

Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, [click here](#).

Lower portion — "All contributions are made directly to: Friends of Emily Dievendorf, PO Box 16026 Lansing, MI 48901" notice, followed by ActBlue's generic platform notice

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Mitchell Ryan Distin — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrikmi@gmail.com

2. Respondent Information

Candidate: Mitchell Ryan Distin

Committee: Mitch for Michigan

Office Sought: State Representative, District 104

Campaign/Donation Page(s) Reviewed: mitch4michigan.com;
<https://secure.actblue.com/donate/mitchell-ryan-distin-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the website located at mitch4michigan.com for Mitchell Ryan Distin, captioned "Mitch for Michigan." The portion of the page captured includes a donation module built directly into the campaign website, under the heading "WE'RE GRATEFUL FOR YOUR DONATIONS!," offering preset contribution amounts (\$25, \$50, \$104, \$500, \$1,225) and an "Other" button — an express, direct solicitation of campaign contributions from the candidate's own website. The footer also lists "Contact and Press Inquiries: info@Mitch4Michigan.com."

Set apart in its own bordered box below the donation buttons and contact information, the page states "Paid for by Mitch for Michigan." This identifies a committee name, but no street or mailing address accompanies it anywhere in the material reviewed for this page. As such, this statement does not satisfy MCL 169.247(1), which requires the committee name and its address to appear together as a single, self-contained statement.

B. ActBlue Donation Page (Exhibit B)

On or about Monday, August 31, 2026, Complainant's designee accessed the ActBlue donation page located at <https://secure.actblue.com/donate/mitchell-ryan-distin-1>, captioned "Mitchell Ryan Distin — Donate via ActBlue." The page displays a campaign graphic reading "MITCH FOR MICHIGAN'S 104th," with the tagline "Out With The Old — In With The New" and the URL "www.Mitch4Michigan.com." A fundraising thermometer states "\$420 Raised... GOAL \$10,000... Mitch for Michigan," and the accompanying text states, "This is a campaign run by the people, for the people. As such, we only accept individual donations and contributions. We will never accept any corporate PAC or billionaire money, because the people deserve a state representative who works for them, not the corporate class." A donation module states "Your contribution will benefit Mitchell Ryan Distin." This content constitutes express advocacy soliciting contributions for Mr. Distin's election.

No "Paid for by [Committee], [Address]" statement appears anywhere on the ActBlue page. The only disclosure of any kind is the generic boilerplate statement at the bottom: "Platform paid for by ActBlue

(actblue.com) and not authorized by any candidate or candidate committee...." This is ActBlue's own standard platform disclaimer, not a disclosure specific to the Mitch for Michigan committee.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

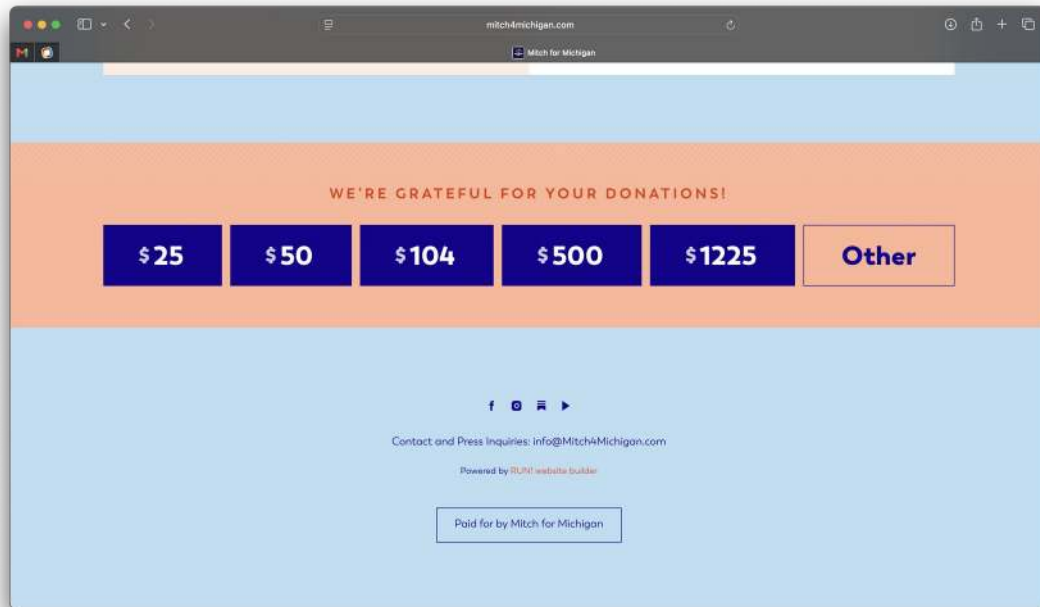
Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (campaign website screenshot); Exhibit B (ActBlue donation page screenshots)

EXHIBIT A

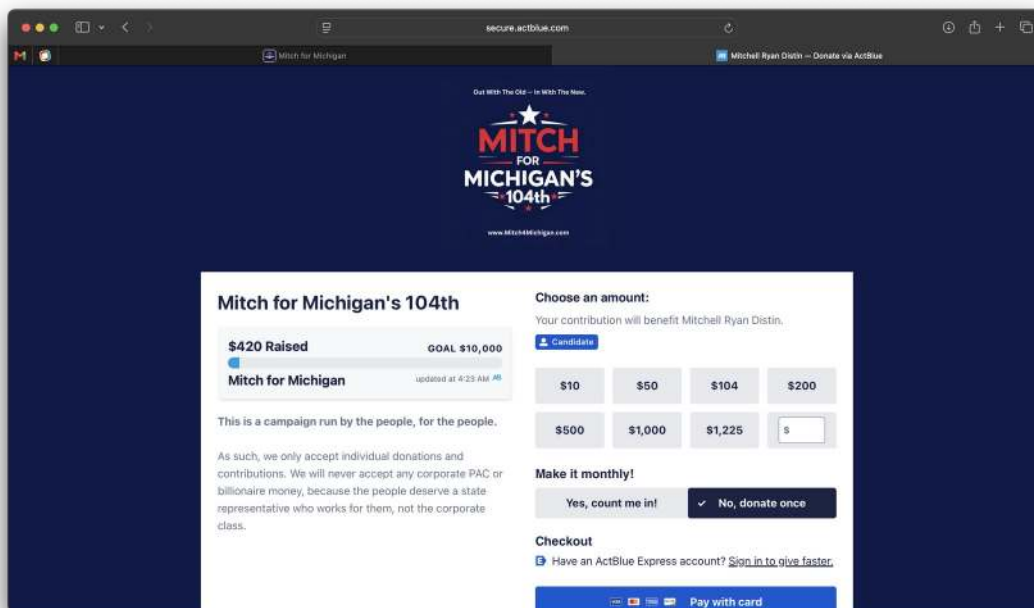
Screenshot of the mitch4michigan.com campaign website, captured on or about August 31, 2026



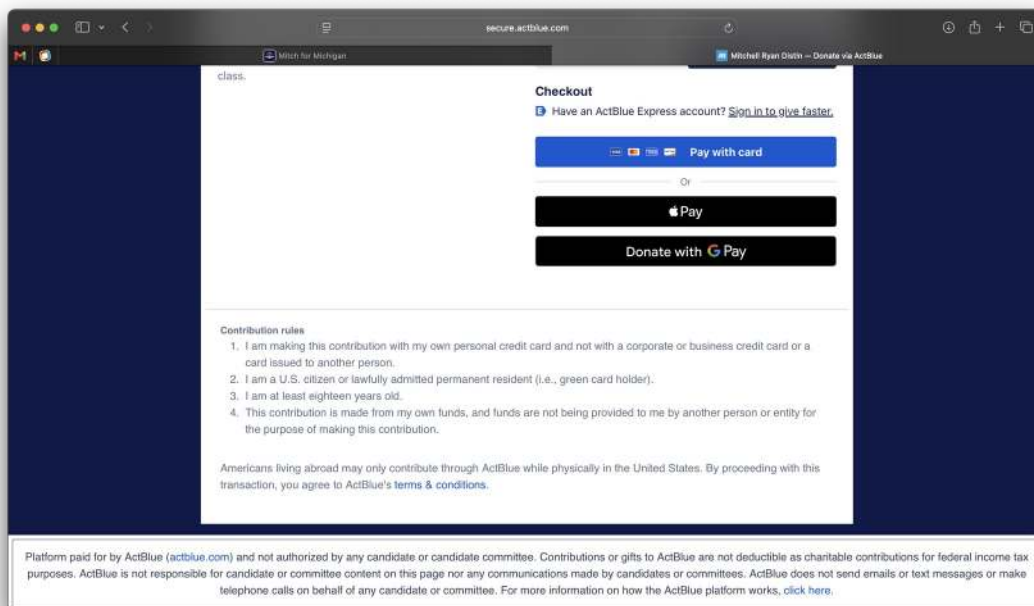
Campaign website footer — built-in donation module and "Paid for by Mitch for Michigan" statement with no accompanying address

EXHIBIT B

Screenshots of the secure.actblue.com donation page for Mitchell Ryan Distin, captured on or about August 31, 2026



Upper portion of donation page — campaign graphic and fundraising thermometer



Lower portion — only ActBlue's generic platform notice appears; no committee-specific "Paid for by" statement

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Alabas Farhat — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Alabas Farhat

Committee: Not identified by name in the material reviewed

Office Sought: State Representative, District 3

Campaign/Donation Page(s) Reviewed: votefarhat.com

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed the website located at voteFarhat.com for Alabas Farhat, a candidate for State Representative, District 3. The screenshot attached as Exhibit A shows the full extent of the page as it loads: below a “Contribute to Our Movement” donation-amount selector and a “Working for You” section heading, the page ends in a solid black band, with no footer of any kind beneath it. No “Paid for by” statement or other funding-source identification of any kind — no committee name, and no address — appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

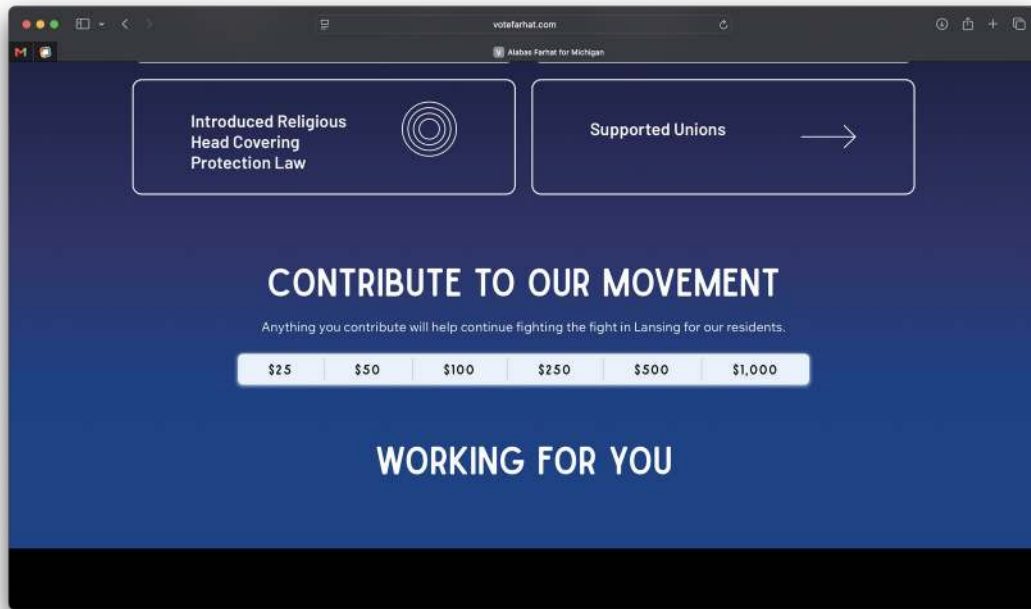
I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

Enclosures: Exhibit A (full-page website screenshot)

EXHIBIT A

Full-page screenshot of votefarhat.com showing the entire page, captured on or about August 29, 2026



Full page as loaded — no footer or disclaimer of any kind; the black band is the true end of the page

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Thomas Faro — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Thomas Faro

Committee: Committee to Re-Elect Thomas Faro

Office Sought: Milan Area Schools Board of Education

Campaign/Donation Page(s) Reviewed: faroformilanschools.org

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed the “About” page of the website located at faroformilanschools.org for Thomas Faro, a candidate for the Milan Area Schools Board of Education. The footer of the page states only “© 2026 COMMITTEE TO RE-ELECT THOMAS FARO,” a copyright notice rather than a “Paid for by” disclosure. No mailing address for the committee appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

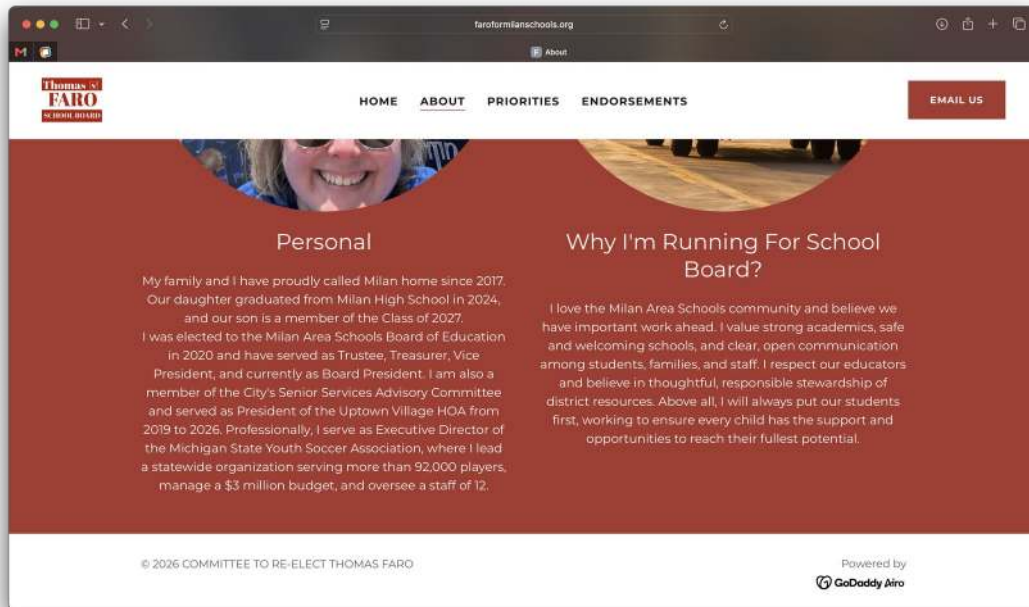
I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

Enclosures: Exhibit A (website screenshot)

EXHIBIT A

Screenshot of the faroformilanschools.org About page and footer, captured on or about August 29, 2026



Website footer — committee named only in a copyright line, no “Paid for by” statement and no address

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Kimberly Fisher — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Kimberly Fisher

Committee: Not identified by name in the material reviewed

Office Sought: State Representative, District 11

Campaign/Donation Page(s) Reviewed: <https://secure.actblue.com/donate/kimberlyfisher> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed a donation page hosted at <https://secure.actblue.com/donate/kimberlyfisher> soliciting contributions to “Kimberly Fisher for State Representative,” House District 11. The page states that the contribution “will benefit Kimberly Fisher” and contains extensive biographical text about the candidate, but nowhere identifies any campaign committee by name. This page's title, “Kimberly Fisher for State Representative,” together with its biographical content promoting her candidacy constitutes express advocacy for her election under *Golden v. Yahkind*, bringing the page within MCL 169.247's disclosure requirement.

The only funding-source disclosure on the page is ActBlue's generic footer notice stating that the page is “Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” No statement identifying a committee for Kimberly Fisher, by name or address, appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

Enclosures: Exhibit A (donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Kimberly Fisher, captured on or about August 29, 2026

This screenshot shows the top half of a donation page. On the left, there is a heading "Donate to Kimberly Fisher for State Representative!" followed by a paragraph of text about her background and community involvement. On the right, there is a "Choose an amount:" section with a grid of buttons for \$25, \$50, \$100, \$200, \$500, \$1,000, and \$1,225, plus a custom amount field. Below this is a "Make it monthly!" section with a checkbox and two buttons: "Yes, count me in!" and "No, donate once" (which is selected). At the bottom right, there is a "Checkout" section with a link to sign in for faster checkout.

KIMBERLY FISHER
FOR STATE REPRESENTATIVE
HOUSE DISTRICT 11

Donate to Kimberly Fisher for State Representative!

Kimberly's candidacy is rooted in lived experience, deep community ties, and a lifelong commitment to service. A lifelong Detroit, small business owner, public servant, and community activist, Kimberly is the owner of Lily's & Elise Tea House, where she has invested directly in her community by creating jobs and supporting local vendors. She was raised in a family that taught her the value of hard work, leadership, and giving back. With more than 90 years of family roots in the district, she attended neighborhood schools and is a proud graduate of the University of Michigan-Dearborn. She is also a member of Delta Sigma Theta Sorority, Inc., and an advocate for environmental justice through her work aligned with the Michigan Environmental Council.

Choose an amount:
Your contribution will benefit Kimberly Fisher.

[Candidate](#)

\$25 \$50 \$100 \$200
\$500 \$1,000 \$1,225 \$

Make it monthly!
Your sustaining support allows us to create budgets and plan ahead!

☐ Yes, count me in! ☒ No, donate once

Checkout
[Have an ActBlue Express account? Sign in to give faster.](#)

Upper portion of donation page — no committee or address named

This screenshot shows the bottom half of the donation page. It continues the candidate biography from the previous section. Below the biography, there is a "Checkout" section with a link to sign in for faster checkout. Underneath, there are three payment options: "Pay with card", "Apple Pay", and "Donate with Google Pay". At the bottom, there is a "Contribution rules" section with four numbered rules. Below the rules, there is a disclaimer about the platform being paid for by ActBlue and a link to the terms and conditions.

University of Michigan-Dearborn. She is also a member of Delta Sigma Theta Sorority, Inc., and an advocate for environmental justice through her work aligned with the Michigan Environmental Council.

Kimberly understands firsthand the challenges facing families in District 11—from high utility costs to limited job access—and has dedicated her career to creating opportunity where it has been denied. With a proven record of investing in her community and rebuilding from the ground up, she brings steady, people-centered leadership focused on revitalizing neighborhoods in both Detroit and Warren. Thank you for supporting a campaign grounded in service, accountability, and hope for the future of Michigan's 11th House District.

Checkout
[Have an ActBlue Express account? Sign in to give faster.](#)

☐ Yes, count me in! ☒ No, donate once

[Pay with card](#)
Or
[Apple Pay](#)
[Donate with Google Pay](#)

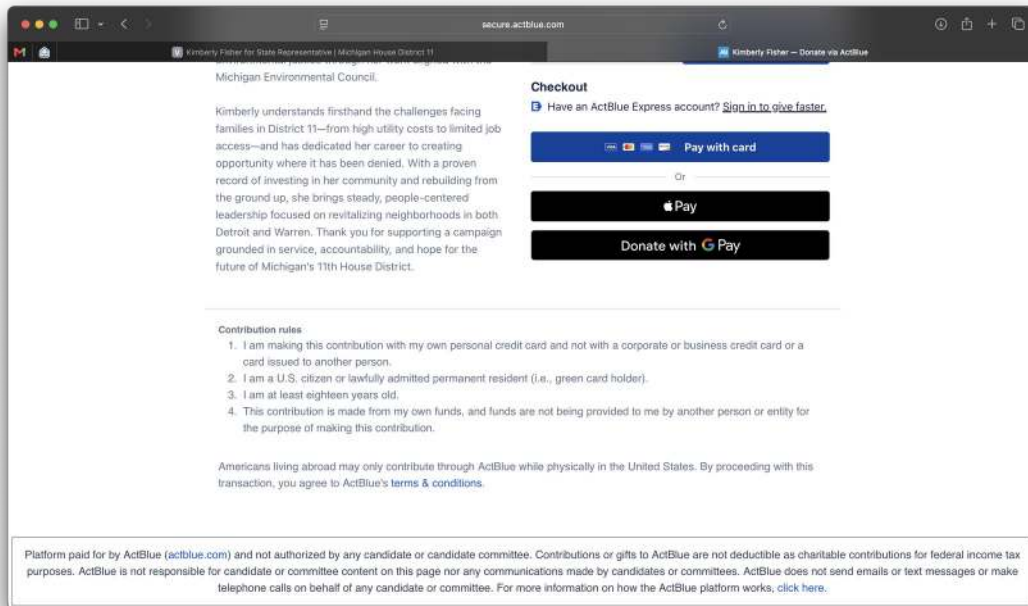
Contribution rules

1. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person.
2. I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder).
3. I am at least eighteen years old.
4. This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution.

Americans living abroad may only contribute through ActBlue while physically in the United States. By proceeding with this transaction, you agree to ActBlue's [terms & conditions](#).

Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax.

Middle portion of donation page, continuing candidate biography



Lower portion of donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against John Fitzgerald — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: John Fitzgerald

Committee: Friends of John Fitzgerald

Office Sought: State Representative, District 83

Campaign/Donation Page(s) Reviewed: john4mi.com; <https://secure.actblue.com/donate/john-for-mi> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. ActBlue Donation Page (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the ActBlue donation page located at <https://secure.actblue.com/donate/john-for-mi>, captioned "John Fitzgerald — Donate via ActBlue." The page displays a campaign wordmark reading "John FITZGERALD State Representative" under the heading "Help re-elect John Fitzgerald!" The accompanying text states that "John Fitzgerald is running for re-election as State Representative in the 83rd District" and expressly solicits support, stating, "This is a battleground race for control of the Michigan legislature... Help fuel the campaign with a donation, any level helps!," and concluding with the direct appeal, "Can John count on your support to strengthen Michigan's future?" A donation module states "Your contribution will benefit John Fitzgerald" alongside preset contribution amounts. This content constitutes express advocacy for Mr. Fitzgerald's reelection.

Further down the page, set apart from the solicitation text, the page states: "Checks can be mailed and made out to: Friends of John Fitzgerald, 1780 Glenvale Ct SW, Wyoming, MI 49519." While this passage identifies a committee name together with a mailing address, it is framed exclusively as payment instructions for mailed checks — introduced by "Checks can be mailed and made out to:" — rather than as a "Paid for by" identification statement. No statement using "Paid for by" or substantially similar language, identifying the sponsoring committee and its address as a unified disclosure, appears anywhere on the page. The only other disclosure is the generic ActBlue boilerplate: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee...."

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and

- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (ActBlue donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for John Fitzgerald, captured on or about August 31, 2026

John FITZGERALD
State Representative

Help re-elect John Fitzgerald!

John Fitzgerald is running for re-election as **State Representative in the 83rd District**. John needs your support as he seeks to continue his service to his community, fighting for a more just and equitable future for everyone.

This is a **battleground** race for control of the Michigan legislature. The people of Michigan deserve a legislature that puts Michiganders at the center of policymaking, not politics. Simply put, John is ready to continue leading for the people in Lansing.

Help fuel the campaign with a donation, any level helps! Individual donors like you make the difference in campaigns and helps to build a brighter future in Michigan and the 83rd!

Choose an amount:
Your contribution will benefit John Fitzgerald.

[Candidate](#)

\$1,225 \$500 \$250 \$125
\$50 \$25 \$30 \$

Make it monthly!
☐ Yes, count me in! ☒ No, donate once

Checkout
[Have an ActBlue Express account? Sign in to give faster.](#)

[Pay with card](#)

Upper portion — campaign wordmark and solicitation text ("Help re-elect John Fitzgerald!")

[Have an ActBlue Express account? Sign in to give faster.](#)

[Pay with card](#)

Or

[Apple Pay](#)

[Donate with Google Pay](#)

Checks can be mailed and made out to:
Friends of John Fitzgerald
1780 Glenvale Ct SW
Wyoming, MI 49519

Contribution rules

1. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person.
2. I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder).
3. I am at least eighteen years old.
4. This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution.

Americans living abroad may only contribute through ActBlue while physically in the United States. By proceeding with this transaction, you agree to ActBlue's [terms & conditions](#).

Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, [click here](#).

Lower portion — "Checks can be mailed and made out to: Friends of John Fitzgerald, 1780 Glenvale Ct SW, Wyoming, MI 49519" instruction, followed by ActBlue's generic platform notice

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Morgan Foreman — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Morgan Foreman

Committee: Not identified by name in the material reviewed

Office Sought: State Representative, District 33

Campaign/Donation Page(s) Reviewed: <https://secure.actblue.com/donate/morganforeman> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee’s address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed a donation page hosted at <https://secure.actblue.com/donate/morganforeman> soliciting contributions to “Morgan Foreman for State Representative,” stating “Thank you for supporting Democrat Morgan Foreman for State Representative in Michigan's 33rd District.” The page states that the contribution “will benefit Morgan Foreman” but nowhere identifies any campaign committee by name. This page's title, “Morgan Foreman for State Representative,” together with its statement thanking donors “for supporting Democrat Morgan Foreman for State Representative in Michigan's 33rd District” constitutes express advocacy for the candidate's election under *Golden v. Yahkind*, bringing the page within MCL 169.247's disclosure requirement.

The only funding-source disclosure on the page is ActBlue's generic footer notice stating that the page is “Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” No statement identifying a committee for Morgan Foreman, by name or address, appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

Enclosures: Exhibit A (donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Morgan Foreman, captured on or about August 29, 2026

The screenshot shows the top half of a web browser window displaying the ActBlue donation page for Morgan Foreman. The browser's address bar shows 'secure.actblue.com' and the page title is 'Morgan Foreman - Donate via ActBlue'. The page features the 'MORGAN FOREMAN FOR STATE REPRESENTATIVE' logo, which includes a blue outline of Michigan. Below the logo, the text reads 'Morgan Foreman for State Representative' and 'Thank you for supporting Democrat Morgan Foreman for State Representative in Michigan's 33rd District'. To the right, under 'Choose an amount:', there are buttons for \$25, \$50, \$100, and \$250, along with a custom amount input field showing '\$1,225'. Below this is a 'Make it monthly!' section with 'Yes, count me in!' and 'No, donate once' (selected) buttons. A 'Checkout' section asks if the user has an ActBlue Express account with a 'Sign in to give faster' link. At the bottom of this section is a blue 'Pay with card' button.

Upper portion of donation page — no committee or address named

The screenshot shows the bottom half of the same web browser window. The 'Checkout' section is visible, including the 'Pay with card' button and two alternative payment options: 'Apple Pay' and 'Donate with Google Pay'. Below these is a 'Contribution rules' section with four numbered points: 1. 'I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person.', 2. 'I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder).', 3. 'I am at least eighteen years old.', 4. 'This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution.' Below the rules is a note: 'Americans living abroad may only contribute through ActBlue while physically in the United States. By proceeding with this transaction, you agree to ActBlue's terms & conditions.' At the very bottom, a small disclaimer states: 'Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, click here.'

Lower portion of donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Kate Gallup — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Kate Gallup

Committee: Not identified by name in the material reviewed

Office Sought: State Senate, District 37

Campaign/Donation Page(s) Reviewed: gallupformichigan.com;
<https://secure.actblue.com/donate/kaitlin-gallup-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee’s address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. ActBlue Donation Page (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the ActBlue donation page located at <https://secure.actblue.com/donate/kaitlin-gallup-1>, titled "Kaitlin Gallup — Donate via ActBlue." The page is express advocacy on its face: it displays a campaign header graphic reading "Kate GALLUP For MI State Senate" (styled with a stylized horse/wave logo), alongside a photograph of the candidate holding a campaign yard sign reading "Kate GALLUP for State Senate D37." The page's headline reads "Donate to Elect Kate Gallup!" followed by the text "Pitch in today to support Kate Gallup for Michigan State Senate-District 37. Together, we can flip this district and move our community forward." The donation module states "Choose an amount: Your contribution will benefit Kaitlin Gallup," with preset contribution buttons (\$5, \$20, \$37, \$50, \$100, \$1,000, \$2,450) and a "Yes, count me in!" recurring-donation option, together with "Pay with card," Apple Pay, and Google Pay buttons soliciting an immediate financial contribution to the candidate's campaign.

Complainant's designee reviewed the entire page, including the full biographical narrative and the footer area, and found no "Paid for by" statement, committee name, or committee address attributable to the candidate or her committee anywhere on the page. The only disclosure of any kind appears at the very bottom of the page, in a bordered box, and reads in full: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, click here." This is ActBlue's own generic, platform-wide boilerplate notice — it does not name Kate Gallup's committee, does not provide a committee address, and by its own terms expressly disclaims any authorization by or responsibility for the candidate or her committee. No "Paid for by [Committee Name], [Address]" statement satisfying MCL 169.247(1) appears anywhere on this express-advocacy donation page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

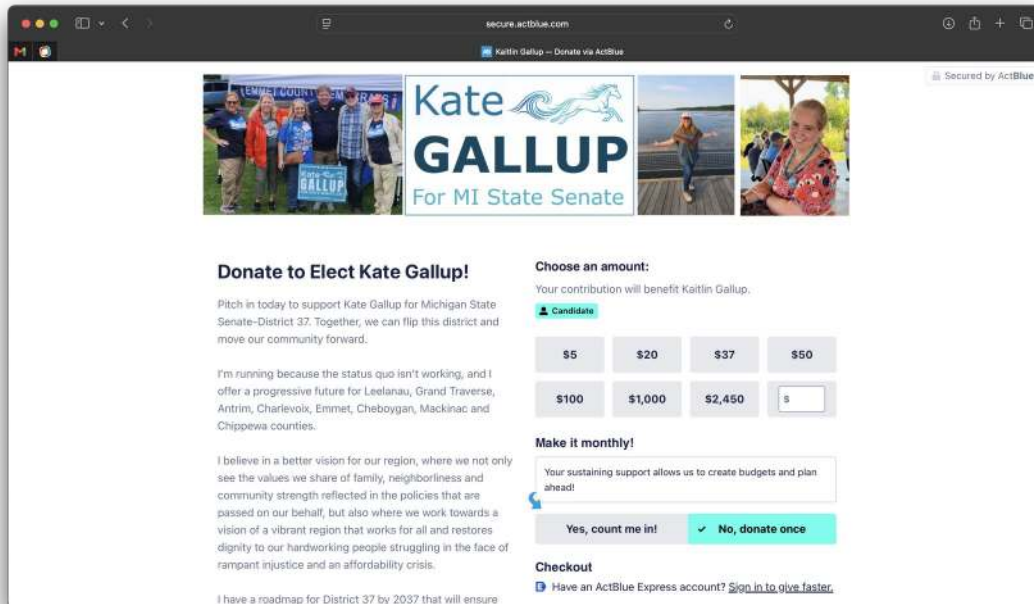
Printed Name: Vance Patrick

Date: August 31st, 2026

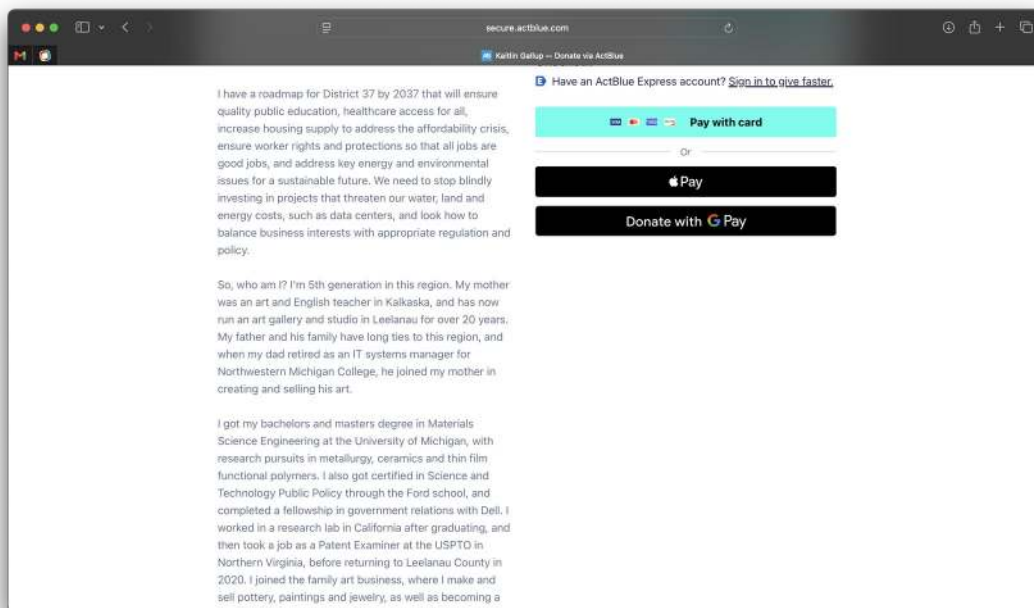
Enclosures: Exhibit A (ActBlue donation page screenshots)

EXHIBIT A

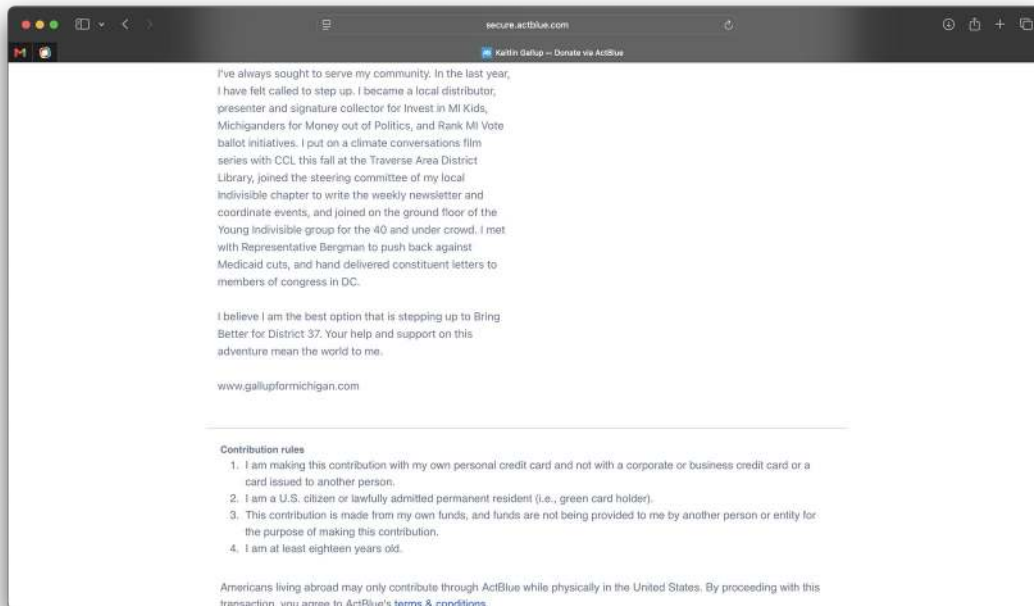
Screenshots of the secure.actblue.com donation page for Kate (Kaitlin) Gallup, captured on or about August 31, 2026



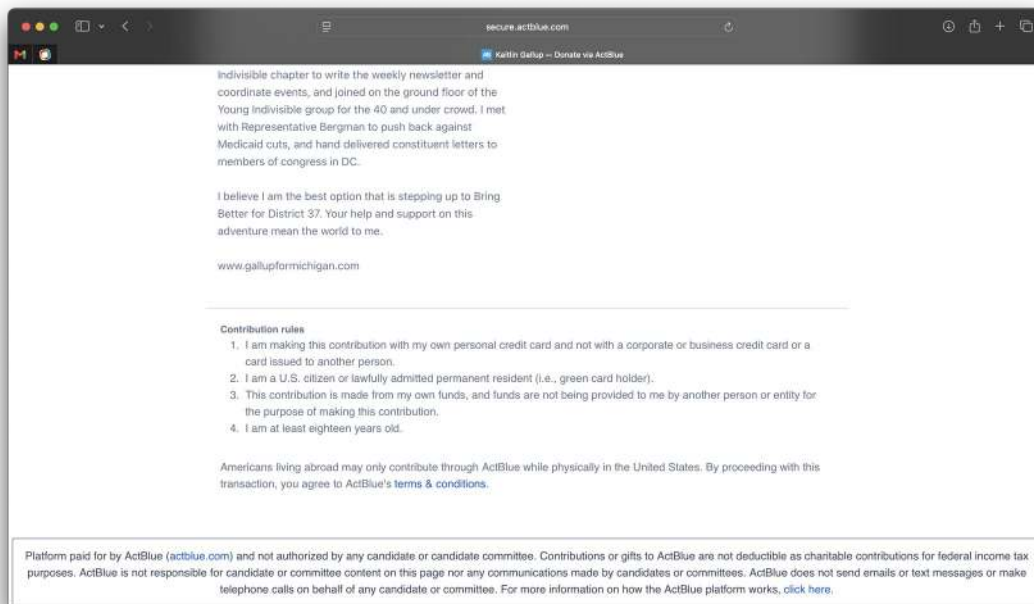
Top of donation page — campaign header graphic, "Donate to Elect Kate Gallup!" and contribution amount buttons



Continuation of candidate biography and payment method buttons; no disclaimer visible



Continuation of candidate biography, campaign website URL, and ActBlue contribution rules



Bottom of page — only ActBlue's generic "Platform paid for by ActBlue" boilerplate notice appears; no committee name or address

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Kelly Garrett — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Kelly Garrett

Committee: Committee to Elect Kelly Garrett

Office Sought: State Representative, District 18 (also currently identified on the page as “Mayor Pro Tem”)

Campaign/Donation Page(s) Reviewed: voteforkellygarrett.com

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Friday, August 28, 2026, Complainant's designee accessed the website located at voteforkellygarrett.com for Kelly Garrett, identified on the page as “Mayor Pro Tem” and a candidate for Michigan State Representative, District 18. The captured portion of the page displays a signup form and a page footer containing a bordered text box that reads only “Committee to Elect Kelly Garrett,” with no preceding “Paid for by” language and no address anywhere in the captured portion of the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

Enclosures: Exhibit A (website screenshot)

EXHIBIT A

Screenshot of the voteforkellygarrett.com footer, captured on or about August 28, 2026

The screenshot shows a web browser window with the address bar displaying "voteforkellygarrett.com". The page content includes a "Sign Up for Updates" form with fields for "FIRST NAME", "LAST NAME", "EMAIL*", and "ZIP", followed by a red "GET UPDATES" button. Below the form is a dark blue footer bar containing social media icons for Facebook and LinkedIn, and a list of navigation links: "MEET KELLY", "VOTER INFORMATION", "ENDORSEMENTS", "EVENTS", "PHOTOS", "CONTACT", and "PRIVACY POLICY". At the bottom of the page, there is a small box containing the text "Committee to Elect Kelly Garrett" and a line of fine print: "Powered by CampaignPartner.com - Political Websites".

Sign Up for Updates

FIRST NAME

LAST NAME

EMAIL*

ZIP

GET UPDATES

f in

MEET KELLY VOTER INFORMATION ENDORSEMENTS EVENTS PHOTOS CONTACT PRIVACY POLICY

Committee to Elect Kelly Garrett

Powered by CampaignPartner.com - Political Websites

Website footer — committee name shown without “Paid for by” language or an address

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Mary Gillis — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Mary Gillis

Committee: Committee to Elect Mary Gillis for Scio Trustee

Office Sought: Scio Township Trustee

Campaign/Donation Page(s) Reviewed: gillisforscio.com; <https://secure.actblue.com/donate/mary-gillis-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed the website located at gillisforscio.com (titled “Gillis For Scio”) for Mary Gillis, a candidate for Scio Township Trustee. The page states that Mary is seeking “election to the Scio Township Board of Trustees.” The footer of the page states “Paid for by the Committee to Elect Mary Gillis for Scio Trustee,” immediately below a contact email address, “gillisforscio@gmail.com.” No street address or PO box for the committee appears anywhere on the page — the only contact information given is the email address.

B. Linked Donation Page (Exhibit B)

Complainant's designee also accessed a linked donation page hosted at <https://secure.actblue.com/donate/mary-gillis-1>, captioned “Donate to Mary Gillis for Scio Trustee!” This caption, “Donate to Mary Gillis for Scio Trustee!,” combines the candidate's name with “for [Office]” branding and a direct call to donate, constituting express advocacy for her election under *Golden v. Yahkind* and bringing the page within MCL 169.247's disclosure requirement. Its only funding-source disclosure is a footer notice stating that the platform itself is “paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” No statement identifying a campaign committee for the candidate, by name or address, appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

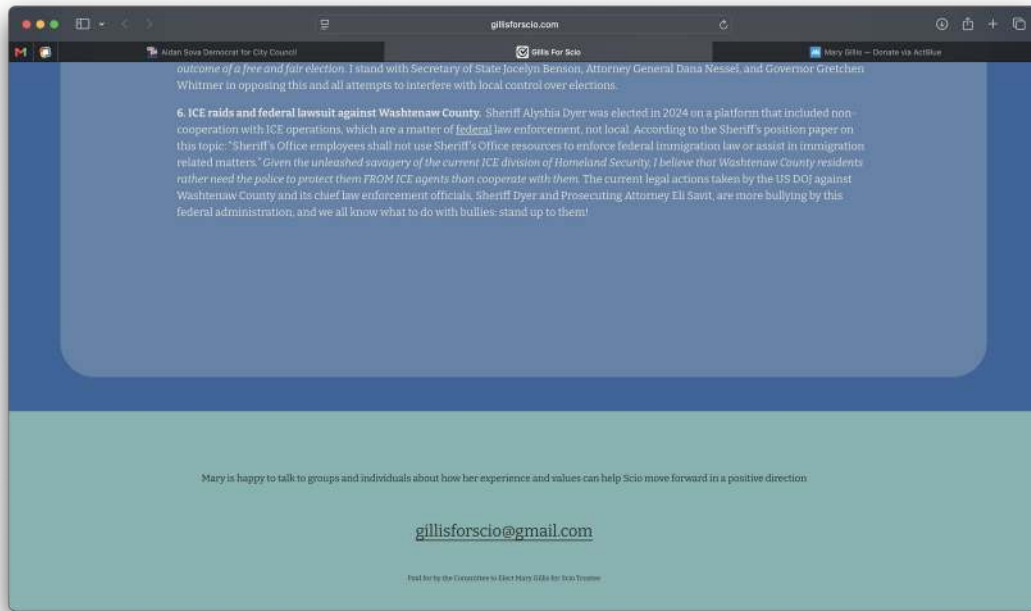
Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (website screenshot); Exhibit B (donation page screenshots)

EXHIBIT A

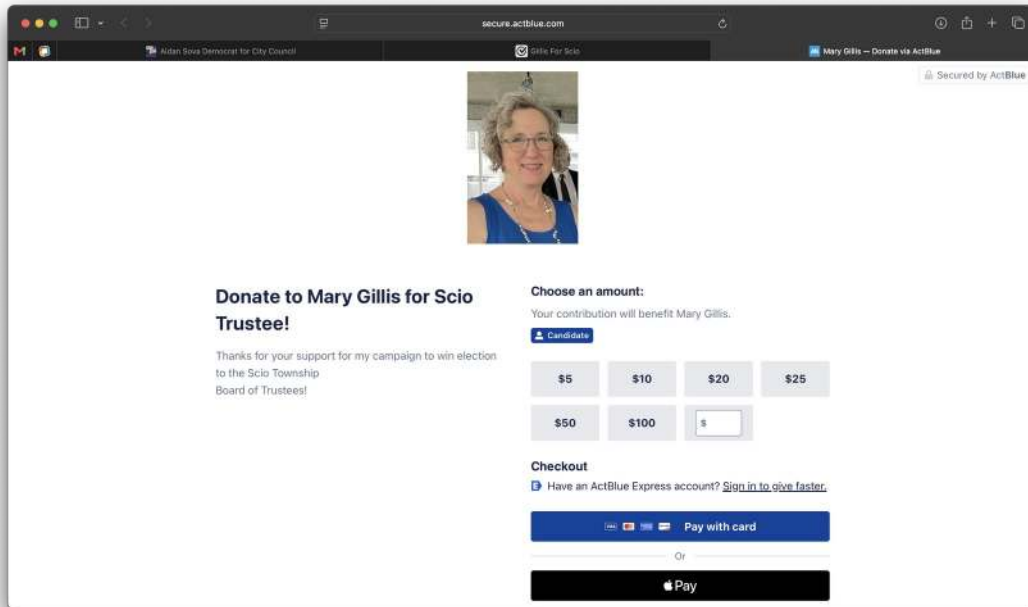
Screenshot of the gillisforscio.com footer, captured on or about August 29, 2026



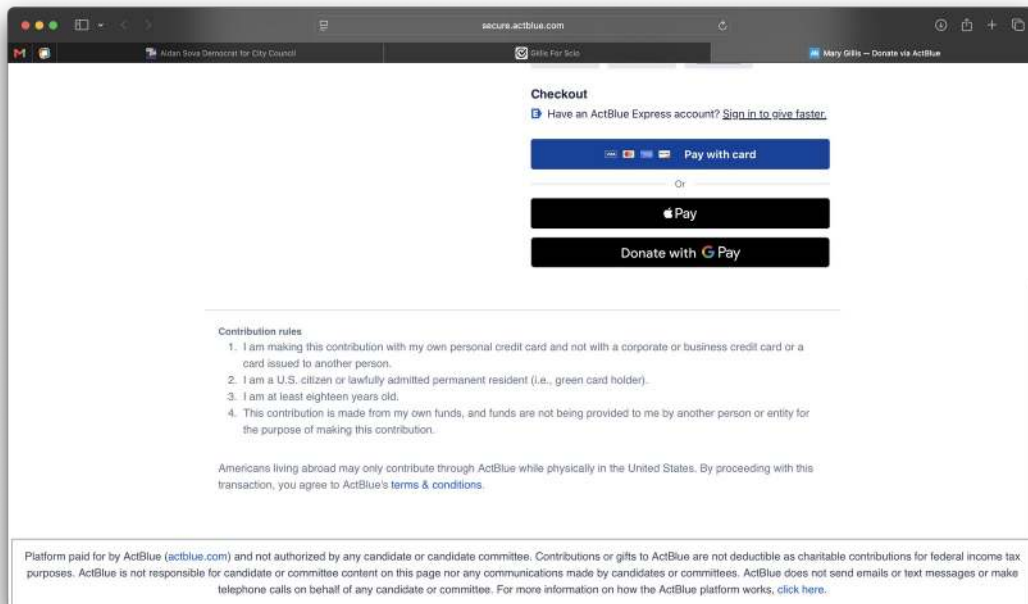
Website footer — committee named with “Paid for by” language but only an email address given, no mailing address

EXHIBIT B

Screenshots of the secure.actblue.com donation page for Mary Gillis, captured on or about August 29, 2026



Upper portion of donation page — no committee or address named



Lower portion of donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Chris Gilmer-Hill — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Chris Gilmer-Hill

Committee: Not identified by name in the material reviewed

Office Sought: State Representative, District 8

Campaign/Donation Page(s) Reviewed: chrisgilmerhill.com; <https://secure.actblue.com/donate/cgh-home> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed a donation page hosted at <https://secure.actblue.com/donate/cgh-home> titled “Chip in to support Chris's campaign for State Rep!,” soliciting contributions to Christopher Gilmer-Hill, a candidate for State Representative, District 8. The page's biographical text, signed in the candidate's own words, states “My name is Chris Gilmer-Hill. I'm a proud lifelong Detroit... running for State Representative in District 8,” and the donation panel states “Your contribution will benefit Christopher Gilmer-Hill.” No campaign committee is named anywhere on the page, and no address appears in this section. The page's title, “Chip in to support Chris's campaign for State Rep!,” together with the candidate's own statement that he is “running for State Representative in District 8” and the donation panel's statement that “Your contribution will benefit Christopher Gilmer-Hill,” constitutes express advocacy for Gilmer-Hill's election within the meaning of *Golden v. Yahkind*, bringing the page within MCL 169.247's disclosure requirement. Its only funding-source disclosure is a footer notice stating that the platform itself is “paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” No statement identifying a campaign committee for the candidate, by name or address, appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

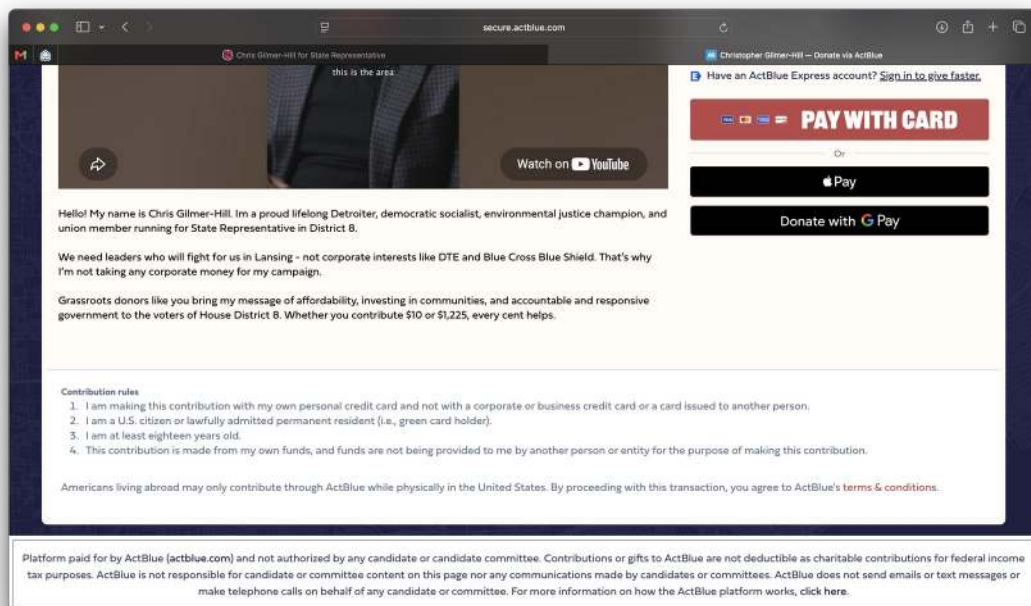
Printed Name: Vance Patrick

Date: August 31st, 2026

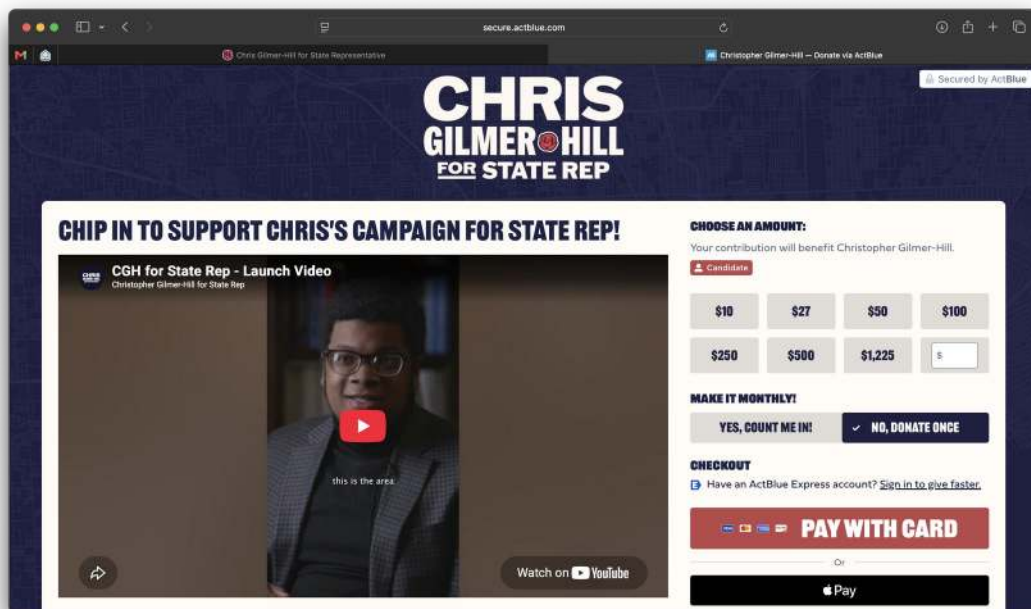
Enclosures: Exhibit A (donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Chris Gilmer-Hill, captured on or about August 29, 2026



Donation page header — candidate branding, video, and donation form, no disclaimer visible



Donation page footer — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Kelli J. Van Ginhoven — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Kelli J. Van Ginhoven

Committee: Kelli van Ginhoven for State Senate

Office Sought: State Senate, District 38

Campaign/Donation Page(s) Reviewed: kvgforsenate2026.com;
<https://secure.actblue.com/donate/kvgforsenate2026> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the website located at kvgforsenate2026.com, titled "Kelli van Ginhoven for Michigan State Senate | District 38." The site's express-advocacy character is evident throughout: the main navigation header displays a campaign logo reading "KELLI VAN GINHOVEN for STATE SENATE" next to an orange "Donate" button and a "Get Involved" button; body text on the page reviewed states "...accepted a dollar from DTE or Blue Cross Blue Shield. That only works if we fund it ourselves," directly beneath which sits a prominent orange call-to-action button reading "DONATE \$25." The page footer repeats a second campaign logo graphic reading "Elect KELLI VAN GINHOVEN for MICHIGAN SENATE DISTRICT 38" directly above another orange "Donate" button, together with footer navigation columns headed "CAMPAIGN," "TAKE ACTION" (including a "Donate" link), and "VOTING."

At the very bottom of the footer, in a single horizontal band, the site displays the text "Paid for by Kelli van Ginhoven for State Senate" followed, further to the right in the same band, by the street address "805 Ludington St., Upper Apt., Escanaba, MI 49829," and then, further right still, a campaign email address (kellifordistrict38@gmail.com) and the campaign website URL (kvgforsenate2026.com). Although the "Paid for by" text and the street address appear in the same navy footer band, close inspection shows they are not presented as a single, unified disclosure statement: the phrase "Paid for by Kelli van Ginhoven for State Senate" is set in a visibly bold (heavier-weight) font, while the street address "805 Ludington St., Upper Apt., Escanaba, MI 49829" immediately to its right is rendered in a plainly lighter, non-bold (regular) weight of the same sans-serif typeface — the identical regular weight used for the unrelated campaign email address and website URL that follow it. In other words, the address is styled and weighted exactly like the page's general contact information, not like part of the disclosure sentence that precedes it. This visible difference in font weight — bold disclosure text versus regular-weight address text — is independent, additional evidence that the committee name and the street address are not unified into a single, self-contained "Paid for by [Committee], [Address]" statement as MCL 169.247(1) requires, but are instead two separately styled design elements that merely happen to sit in the same footer row.

B. ActBlue Donation Page (Exhibit B)

On or about Monday, August 31, 2026, Complainant's designee also accessed the linked ActBlue donation page at <https://secure.actblue.com/donate/kvgforsenate2026>, titled "Kelli Van Ginhoven — Donate via ActBlue." The page displays the same express campaign branding as the website — a graphic reading "Elect KELLI / VAN GINHOVEN / for MICHIGAN SENATE / DISTRICT 38" — under the heading "Donate to Kelli Van Ginhoven!" with the solicitation text: "Pitch in today to support Kelli Van Ginhoven for Michigan State Senate- District 38. Together, we can move our UP forward." The donation module states "Your contribution will benefit Kelli Van Ginhoven," with preset amount buttons (\$10 to \$1,000) and card/Apple Pay/Google Pay options soliciting an immediate contribution.

Unlike the campaign website, the ActBlue donation page contains no "Paid for by" statement, committee name, or address of any kind. The only disclosure present on this page is ActBlue's generic platform-wide boilerplate at the bottom: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, click here." This is ActBlue's own disclosure, not the committee's, and does not satisfy MCL 169.247(1).

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

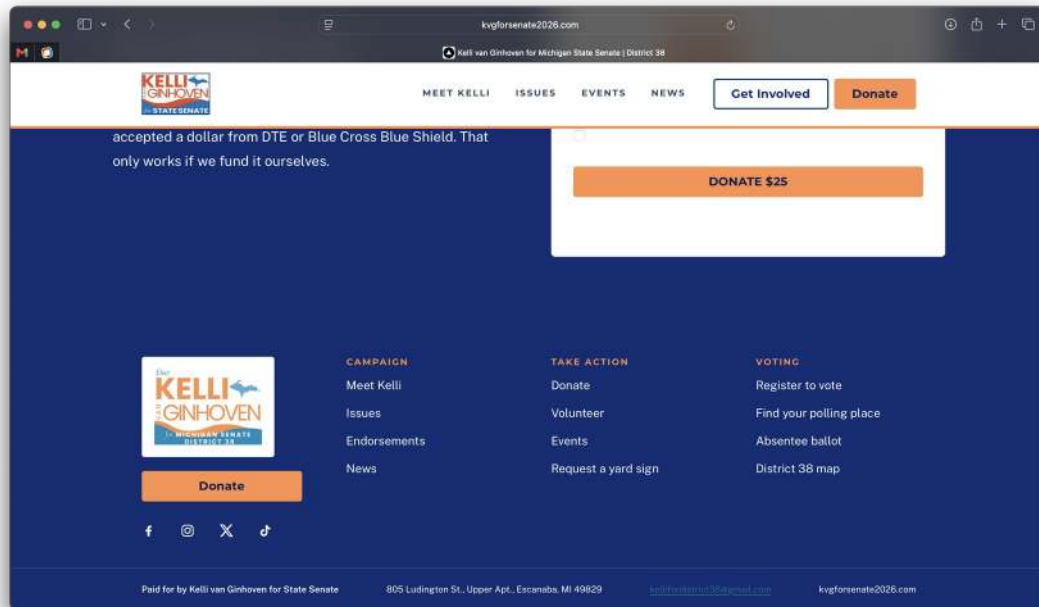
Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (campaign website footer screenshot); Exhibit B (ActBlue donation page screenshots)

EXHIBIT A

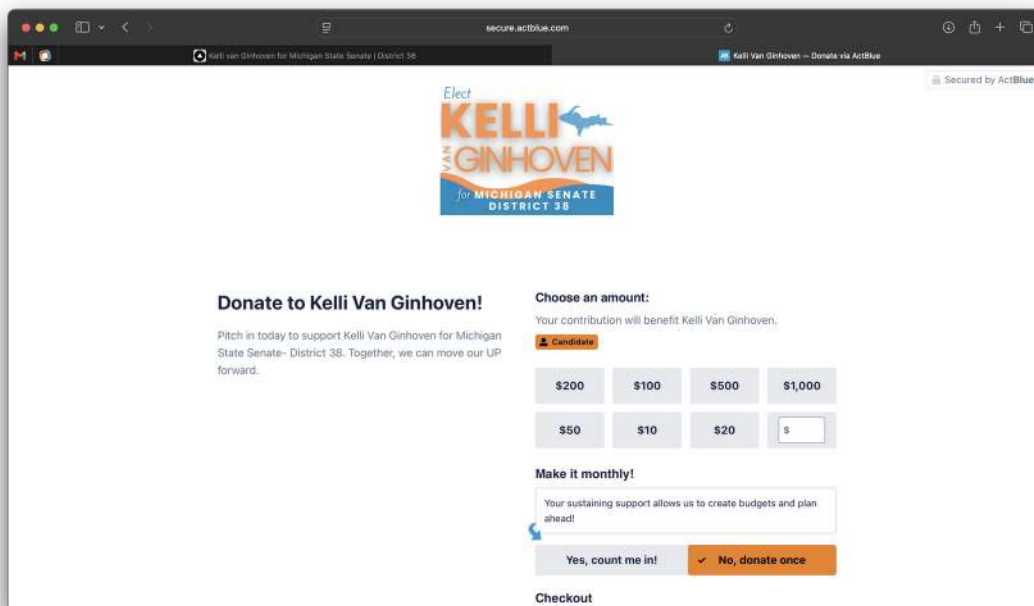
Screenshot of the kvgforsenate2026.com website footer, captured on or about August 31, 2026



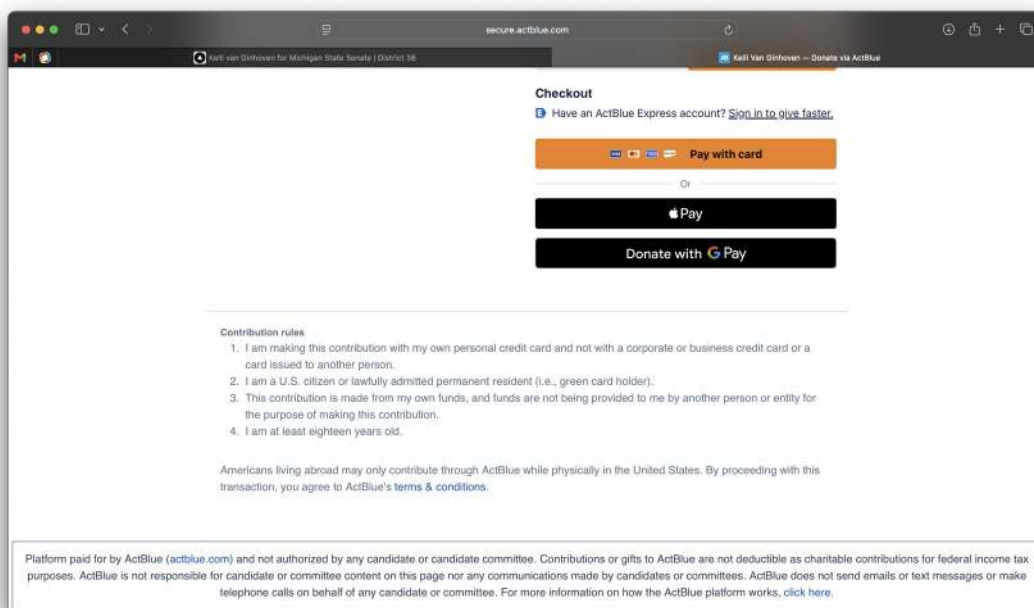
Website footer — "Paid for by Kelli van Ginhoven for State Senate" (bold text) followed in the same band by the street address "805 Ludington St., Upper Apt., Escanaba, MI 49829" in a visibly lighter, non-bold font matching the regular weight of the adjacent email/website text, not the bolded disclosure text

EXHIBIT B

Screenshots of the secure.actblue.com donation page for Kelli J. Van Ginhoven, captured on or about August 31, 2026



Top of donation page — "Elect Kelli Van Ginhoven for Michigan Senate District 38" campaign graphic and "Donate to Kelli Van Ginhoven!" heading



Bottom of page — only ActBlue's generic "Platform paid for by ActBlue" boilerplate notice appears; no committee name or address

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Christopher R. Girard — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Christopher R. Girard

Committee: Not identified by name in the material reviewed

Office Sought: State Representative, District 96

Campaign/Donation Page(s) Reviewed: girardformichigan.com;
<https://secure.actblue.com/donate/christopher-girard-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. ActBlue Donation Page (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the ActBlue donation page located at <https://secure.actblue.com/donate/christopher-girard-1>, titled "Christopher Girard — Donate via ActBlue." The page displays express advocacy in the form of a campaign logo graphic reading "CHRIS GIRARD for STATE REP DISTRICT 96" set against a red-white-and-blue banner, alongside a large photograph of the candidate wearing a suit lapel pin. The page headline reads "Support Christopher Girard for State Representative," followed by campaign text: "Chris Girard is a proven leader, community advocate, and public servant dedicated to delivering real results for Michigan families," and later, "Now running for the Michigan House, Chris Girard is ready to take that same results-driven approach to Lansing. He is committed to fighting for stronger communities, expanding economic opportunity, and ensuring every family has a fair shot at success." The donation module states "Your contribution will benefit Christopher Girard," with preset buttons (\$10, \$100, \$250, \$1,000) and "Pay with card"/Apple Pay/Google Pay options directly soliciting contributions.

Complainant's designee reviewed the full page, including the complete biographical text and the footer, and found no "Paid for by" statement or committee address of any kind naming Girard's committee. The only disclosure present is ActBlue's standard platform-wide boilerplate at the bottom of the page: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, click here." That notice is ActBlue's own disclosure, not the committee's, and does not identify Girard's committee or its address. No statement satisfying MCL 169.247(1) appears on this express-advocacy solicitation page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

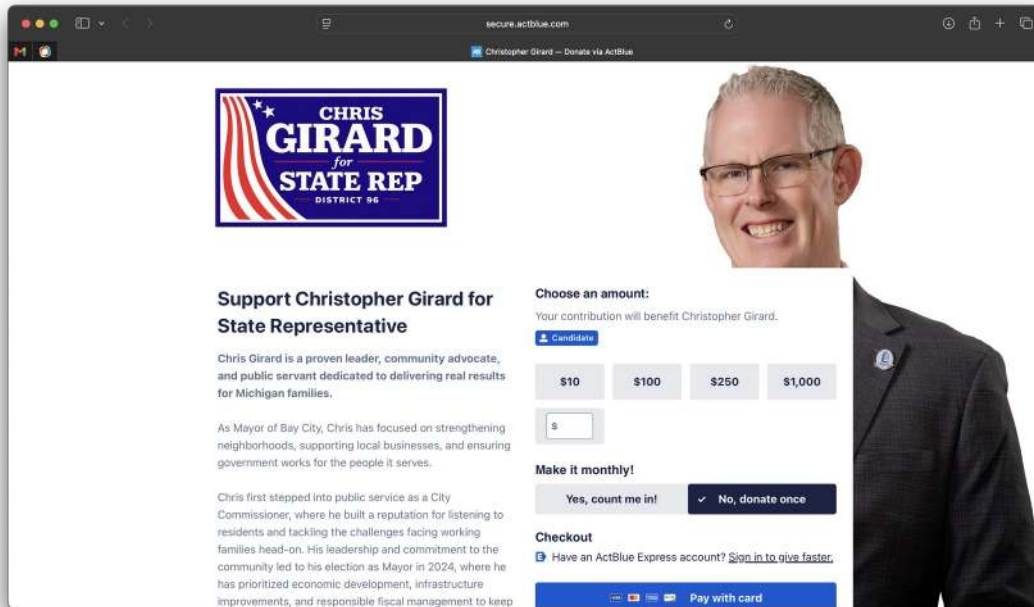
Printed Name: Vance Patrick

Date: August 31st, 2026

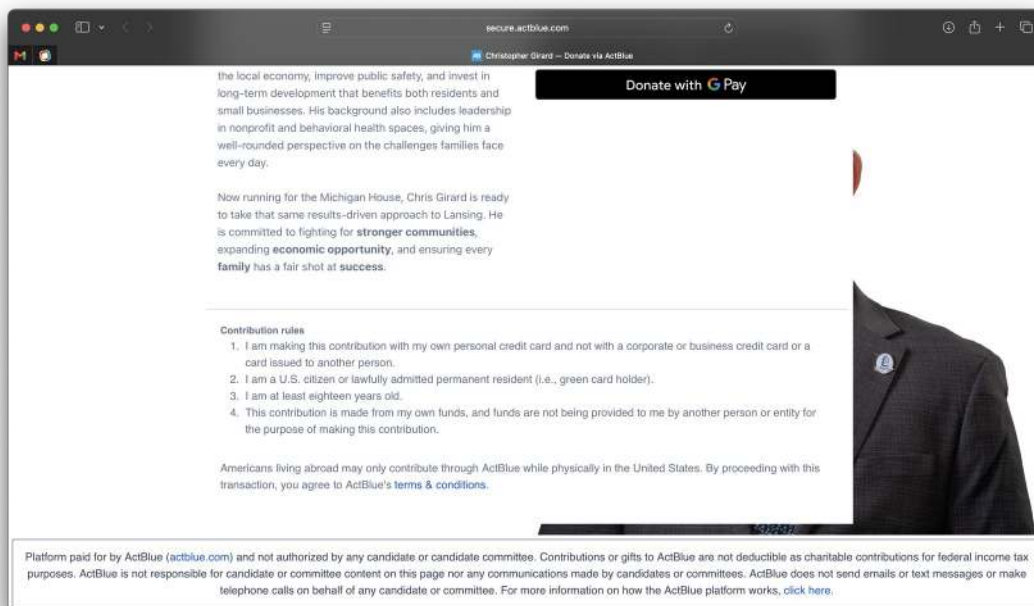
Enclosures: Exhibit A (ActBlue donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Christopher R. Girard, captured on or about August 31, 2026



Top of donation page — "CHRIS GIRARD for STATE REP DISTRICT 96" campaign logo, candidate photograph, and "Support Christopher Girard for State Representative" heading



Bottom of page — only ActBlue's generic "Platform paid for by ActBlue" boilerplate notice appears; no committee name or address

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Rachel Goldberg — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Rachel Goldberg

Committee: Committee to Elect Cassie Haynes, Rachel Goldberg, and Gaurav Kulkarni

Office Sought: Ann Arbor District Library Board of Trustees Member

Campaign/Donation Page(s) Reviewed: aadl2026.com; <https://secure.actblue.com/donate/committee-to-elect-cassie-haynes--rachel-goldberg--and-gau-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Joint Campaign Website (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed the website located at aadl2026.com, the joint campaign website for Cassie Haynes, Rachel Goldberg, and Gaurav Kulkarni, each a candidate for the Ann Arbor District Library Board of Trustees. Rachel Goldberg is one of these three candidates. The footer of the page states, in full: "Paid for by the Committee to Elect Cassie Haynes, Rachel Goldberg, and Gaurav Kulkarni." No mailing address for the committee appears anywhere on the page; the only other contact information given is an email address, "hgkforaadl2026@gmail.com."

B. Linked Donation Page (Exhibit B)

Complainant's designee also accessed a linked donation page hosted at <https://secure.actblue.com/donate/committee-to-elect-cassie-haynes--rachel-goldberg--and-gau-1>, captioned "Committee to Elect Cassie Haynes, Rachel Goldberg, and Gaurav Kulkarni," soliciting contributions that the page states will benefit the "Committee to Elect Cassie Haynes, Rachel Goldberg, and Gaurav Kulkarni," identified on the page as a "Political Group." The page's only funding-source disclosure is a footer notice stating that the platform itself is "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee." No mailing address for the committee appears anywhere on the donation page. The donation page's caption and solicitation, both naming the "Committee to Elect Cassie Haynes, Rachel Goldberg, and Gaurav Kulkarni" and directly soliciting contributions to benefit that committee, constitute express advocacy for Rachel Goldberg's election within the meaning of *Golden v. Yahkind*, bringing the page within MCL 169.247's disclosure requirement.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and

- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

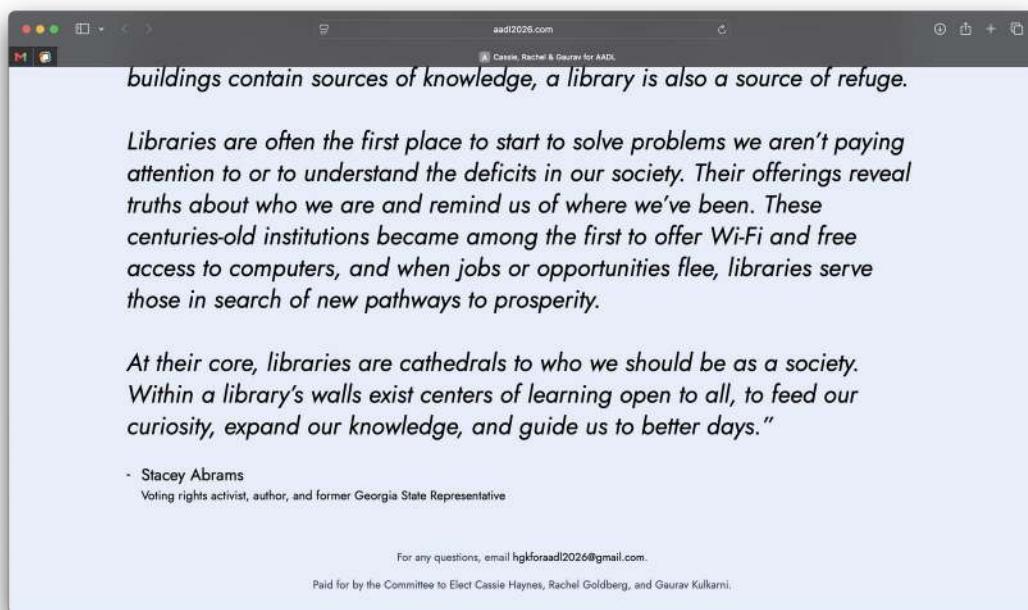
Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (website screenshot); Exhibit B (donation page screenshots)

EXHIBIT A

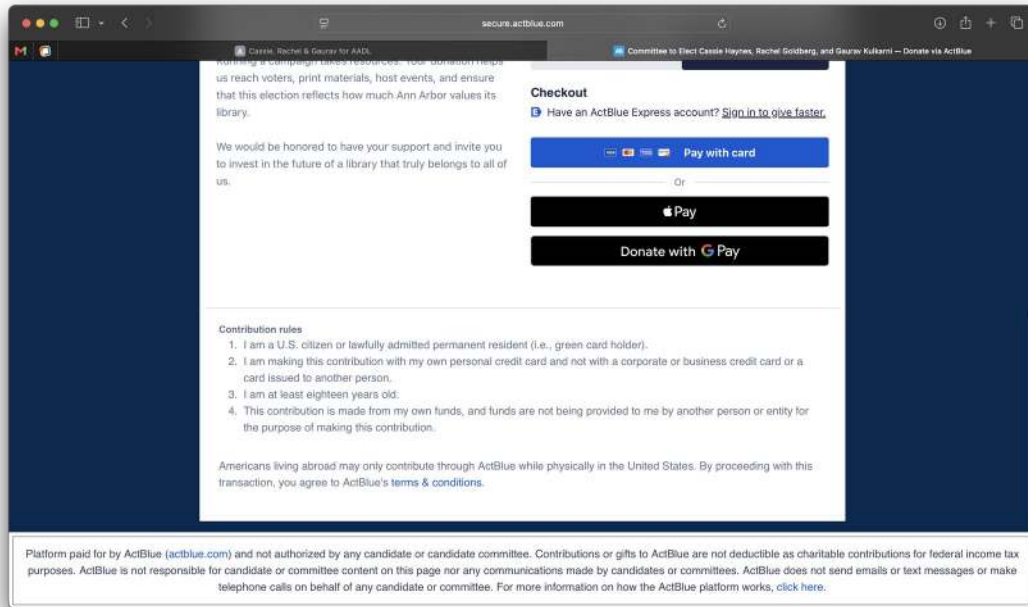
Screenshot of the aadl2026.com footer, captured on or about August 29, 2026



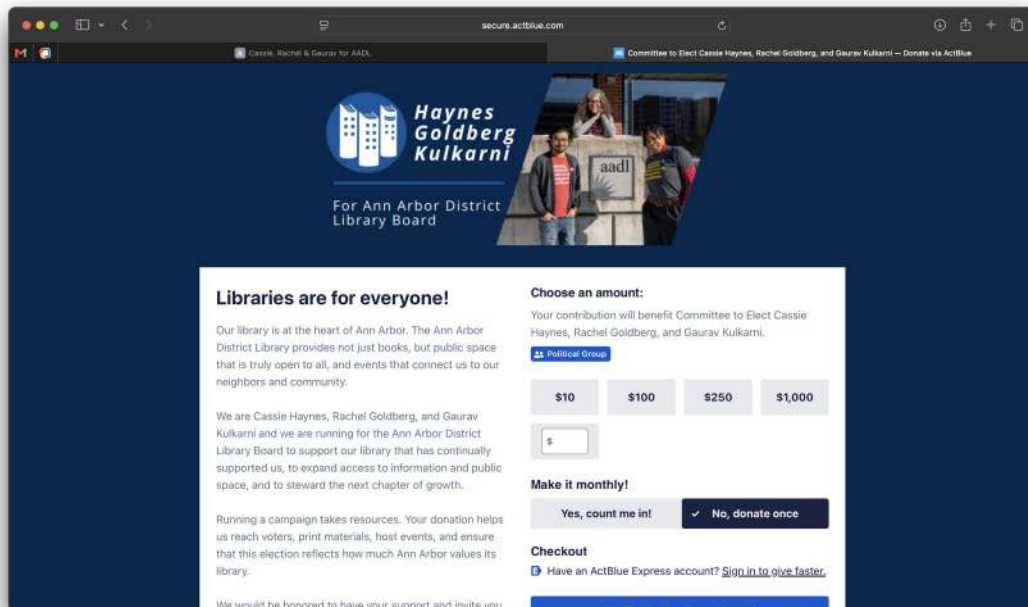
Joint campaign website footer — committee named but no address given

EXHIBIT B

Screenshots of the secure.actblue.com donation page for the Committee to Elect Cassie Haynes, Rachel Goldberg, and Gaurav Kulkarni, captured on or about August 29, 2026



Donation page header — committee identified as a “Political Group,” no address given



Donation page footer — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Kristian C. Grant — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Kristian C. Grant

Committee: Not identified by name in the material reviewed

Office Sought: State Representative, District 82

Campaign/Donation Page(s) Reviewed: electkristiangrant.com;
<https://secure.actblue.com/donate/committee-to-elect-kristian-grant-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee’s address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. ActBlue Donation Page (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the ActBlue donation page located at <https://secure.actblue.com/donate/committee-to-elect-kristian-grant-1>, titled "Kristian Grant — Donate via ActBlue." The page is express advocacy: it displays a campaign logo graphic reading "Kristian GRANT for State House" over a stylized bridge icon, and the donation form is captioned "Elect KG Campaign Donation." The accompanying candidate message states: "Your support helps us to reach voters exactly where they are. It has been my honor to serve you this district, and work on the issues that are important. Thank you for the supporting, I am excited to continue the work! -Kristian G." The donation module confirms "Your contribution will benefit Kristian Grant," with preset amount buttons (\$25, \$50, \$150, \$250, \$500, \$1,225) and card/Apple Pay/Google Pay buttons soliciting an immediate contribution.

The URL slug for this page ("committee-to-elect-kristian-grant-1") and the on-page caption "Elect KG Campaign Donation" suggest a committee name along the lines of a "Committee to Elect Kristian Grant," but no such name, or any other committee name, appears as a formal, printed identification anywhere on the visible page, and Complainant's designee could not confirm the committee's precise registered name from the material reviewed. Regardless of the committee's exact name, no committee address appears anywhere on the page in any form, unified or otherwise. The only disclosure present is ActBlue's generic platform-wide boilerplate at the bottom of the page: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, click here." No statement satisfying MCL 169.247(1) — naming the committee together with its address in a single unified disclosure — appears on this express-advocacy solicitation page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

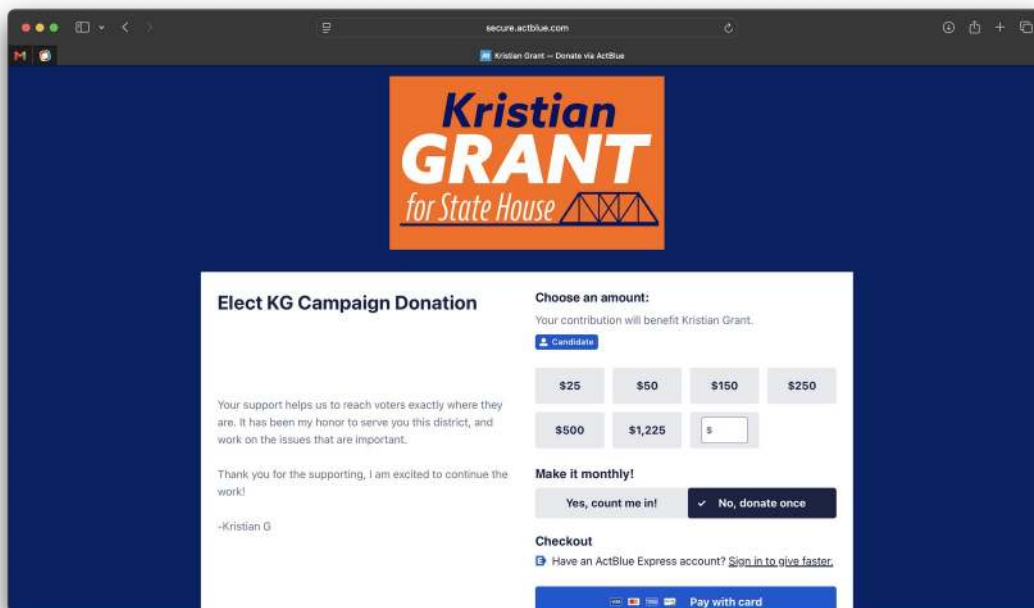
Printed Name: Vance Patrick

Date: August 31st, 2026

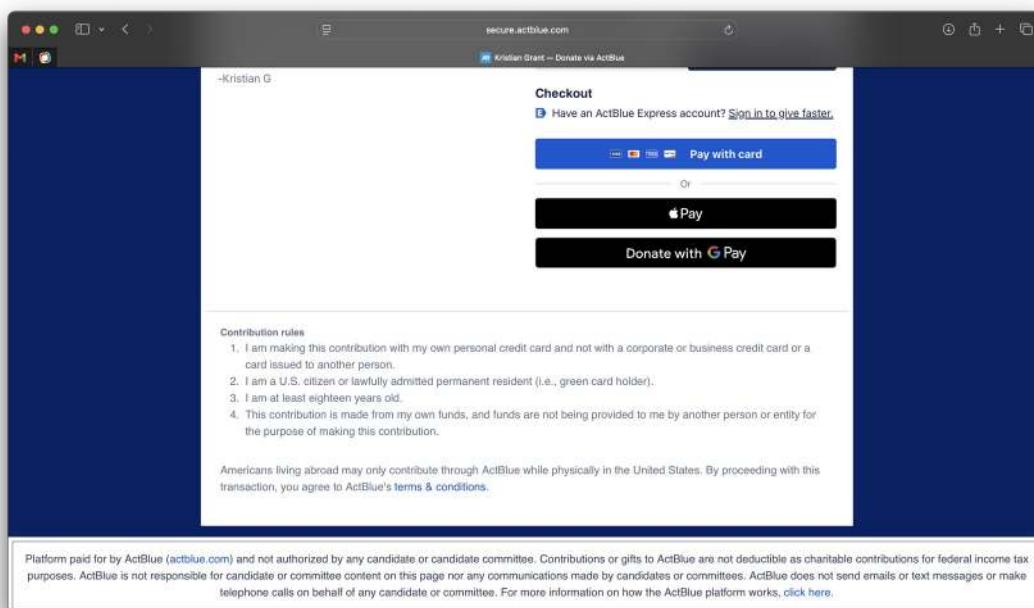
Enclosures: Exhibit A (ActBlue donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Kristian C. Grant, captured on or about August 31, 2026



Top of donation page — "Kristian GRANT for State House" campaign logo and "Elect KG Campaign Donation" heading with candidate message



Bottom of page — only ActBlue's generic "Platform paid for by ActBlue" boilerplate notice appears; no committee address

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Amy Gray — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Amy Gray

Committee: Not identified by name in the material reviewed

Office Sought: State Representative, District 60

Campaign/Donation Page(s) Reviewed: amygrayforhouse.com; <https://secure.actblue.com/donate/amy-gray-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. ActBlue Donation Page (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the ActBlue donation page located at <https://secure.actblue.com/donate/amy-gray-1>, titled "Amy Gray — Donate via ActBlue." The page displays a large campaign banner graphic reading "FAITH • FAMILY • FREEDOM • FUTURE / AMY GRAY FOR STATE REPRESENTATIVE / HOUSE DISTRICT 60 / MACOMB COUNTY, MICHIGAN" over a photograph of the candidate with an American flag, together with the campaign website (www.amygrayforhouse.com) and campaign email (info@amygrayforhouse.com) printed directly on the banner graphic itself. The page headline reads "Donate to Amy Gray for House," with campaign text stating: "This campaign is powered by Macomb residents, not lobbyists. A \$25 contribution today helps us connect with voters and fight for District 60's priorities." The donation module states "Your contribution will benefit Amy Gray," with preset amount buttons (\$10, \$25, \$50, \$250, \$1,000) and card/Apple Pay/Google Pay buttons directly soliciting a financial contribution.

Notably, the banner graphic itself displays a website and an email address for the campaign, demonstrating that the campaign is capable of including contact/identification information directly on its own promotional graphic — yet no "Paid for by" statement or committee address of any kind appears anywhere on the page, on the banner graphic, or in the footer. The only disclosure present is ActBlue's standard platform-wide boilerplate at the bottom of the page: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, [click here](#)." That notice is ActBlue's own disclosure, not the committee's, and does not identify Gray's committee or its address. No statement satisfying MCL 169.247(1) appears on this express-advocacy solicitation page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

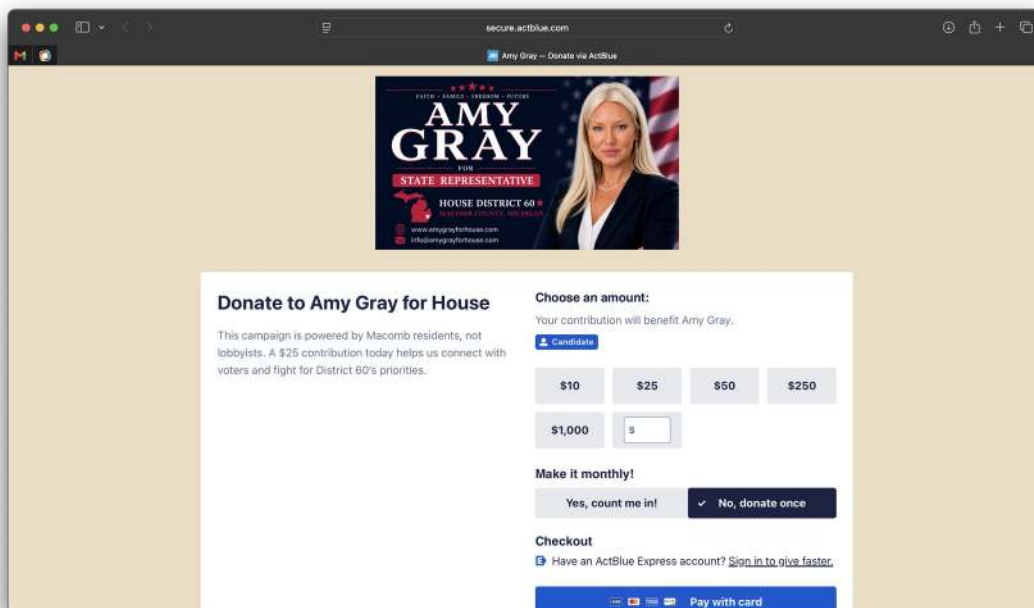
Printed Name: Vance Patrick

Date: August 31st, 2026

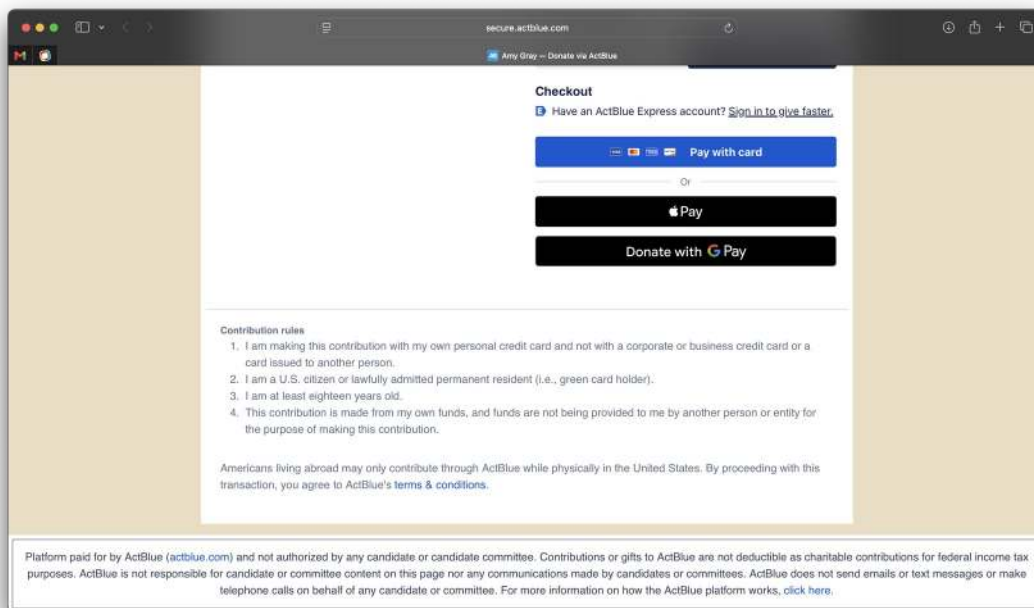
Enclosures: Exhibit A (ActBlue donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Amy Gray, captured on or about August 31, 2026



Top of donation page — "AMY GRAY FOR STATE REPRESENTATIVE, HOUSE DISTRICT 60" campaign banner (with campaign website/email printed on the graphic) and "Donate to Amy Gray for House" heading



Bottom of page — only ActBlue's generic "Platform paid for by ActBlue" boilerplate notice appears; no committee name or address

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Chedrick Greene — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Chedrick Greene

Committee: Not identified by name in the material reviewed

Office Sought: State Senate, District 35

Campaign/Donation Page(s) Reviewed: chedrickgreene.com;
<https://secure.actblue.com/donate/chedrick-greene-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. ActBlue Donation Page (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the ActBlue donation page located at <https://secure.actblue.com/donate/chedrick-greene-1>, titled "Chedrick Greene — Donate via ActBlue." The page displays express campaign branding: a header graphic reading "RE-ELECT / CHEDRICK GREENE / FOR STATE SENATE" flanked by photographs of the candidate, one in U.S. Marine Corps dress uniform (with a disclaimer that "[u]se of rank, title & photographs in uniform does not imply endorsement by the U.S. Marine Corps, Dept. of Defense, or City of Saginaw Fire Dept."). The page headline reads "Donate to Chedrick Greene for State Senate," and the body text states: "Decorated U.S. Marine veteran and retired Fire Captain Chedrick Greene brings three decades of working-class leadership to Lansing, and is fighting to make life more affordable, safe, and free in Michigan Senate District 35 and across the state," and further: "To secure re-election so Democrats can keep majority control of the Michigan Senate under the next governor and Chedrick can continue fighting for hardworking Michiganders, he needs your help now. Please contribute today and consider a recurring donation..." The donation module states "Your contribution will benefit Chedrick Greene," with preset buttons (\$50 to \$2,450) and card/Apple Pay/Google Pay options soliciting a contribution.

Complainant's designee reviewed the full page, including the complete campaign narrative and the footer, and found no "Paid for by" statement or committee address anywhere on the page. The only disclosure present is ActBlue's generic platform-wide boilerplate at the bottom: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, click here." That notice is ActBlue's own disclosure, not the committee's, and does not name Greene's committee or provide its address. No statement satisfying MCL 169.247(1) appears on this express-advocacy solicitation page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

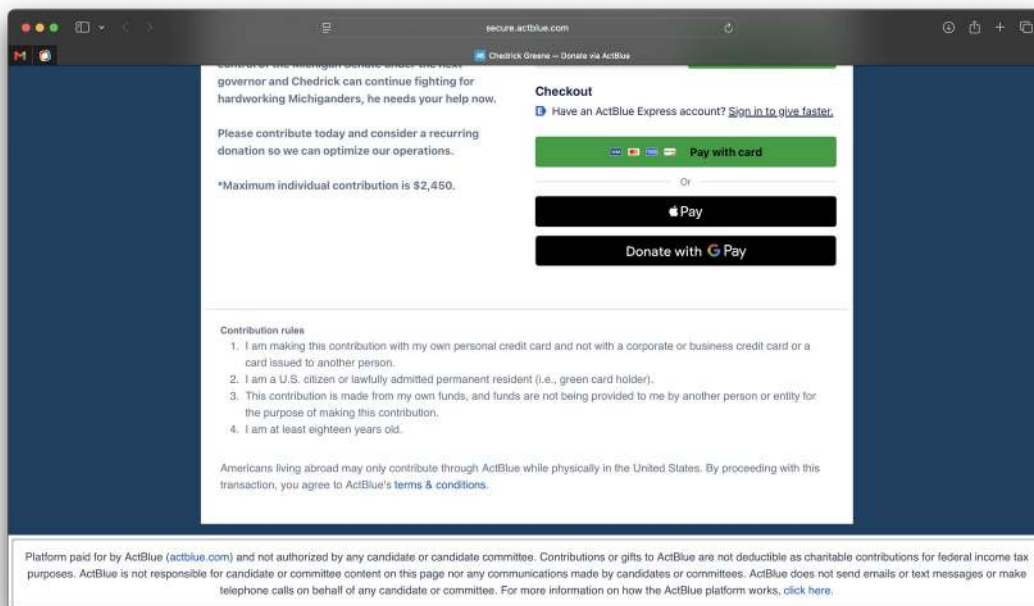
Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (ActBlue donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Chedrick Greene, captured on or about August 31, 2026



Bottom portion of donation page showing campaign narrative and payment options; no disclaimer visible



Top of donation page — "RE-ELECT CHEDRICK GREENE FOR STATE SENATE" banner and "Donate to Chedrick Greene for State Senate" heading; page footer shows only ActBlue's generic boilerplate, no committee name or address

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Cynthia Harrison — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Cynthia Harrison

Committee: Not identified by name in the material reviewed

Office Sought: Ann Arbor City Council, Ward 1

Campaign/Donation Page(s) Reviewed: [votecynthiaharrison.com](https://secure.actblue.com/donate/committee-to-elect-cynthia-harrison-1);
<https://secure.actblue.com/donate/committee-to-elect-cynthia-harrison-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed a donation page hosted at <https://secure.actblue.com/donate/committee-to-elect-cynthia-harrison-1> soliciting contributions to “Re-Elect Cynthia Harrison,” a candidate for Ann Arbor City Council, Ward 1. The page displays campaign branding, a candidate biography, and a directive to “learn more” by visiting votecynthiaharrison.com, but contains no “Paid for by” statement identifying any committee and no address of any kind. This “Re-Elect Cynthia Harrison” campaign branding, together with the page's directive to “learn more” about her candidacy, constitutes express advocacy for her election under *Golden v. Yahkind* and brings the page within MCL 169.247's disclosure requirement.

Scrolling to the bottom of the same donation page, the only funding-source disclosure present is a boxed notice stating that the platform itself is “paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” No statement identifying a campaign committee for Cynthia Harrison, by name or address, appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

Enclosures: Exhibit A (donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Cynthia Harrison, captured on or about August 29, 2026

The screenshot shows the ActBlue donation page for Cynthia Harrison. The header features a logo with a stylized tree and the text "RE-ELECT CYNTHIA HARRISON DEMOCRAT FOR CITY COUNCIL WARD 1". Below the logo, the text "Help Re-Elect Councilmember Cynthia Harrison!" is displayed. A paragraph describes Councilmember Cynthia Harrison's tenure and campaign promises. To the right, a "Choose an amount:" section offers preset donation amounts (\$10, \$25, \$50, \$100, \$250, \$500, \$1,225) and a custom amount field. Below this, a "Make it monthly!" section has two options: "Yes, count me in!" and "No, donate once" (which is selected). A "Checkout" section asks if the user has an ActBlue Express account, with a link to "Sign in to give faster". At the bottom, a blue button labeled "Pay with card" is visible.

ActBlue donation page — candidate description, no disclaimer visible

This screenshot shows the bottom portion of the ActBlue donation page. The "Checkout" section is repeated, showing the "Pay with card" button and the "No, donate once" option. Below the payment options, a section titled "Contribution rules:" lists four numbered rules. Further down, a note states that Americans living abroad may only contribute through ActBlue while physically in the United States. At the very bottom, a small disclaimer states that the platform is paid for by ActBlue and is not authorized by any candidate or committee, and that contributions are not deductible for federal income tax purposes.

Bottom of donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Alex Hawkins — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrikmi@gmail.com

2. Respondent Information

Candidate: Alex Hawkins

Committee: Not identified by name in the material reviewed

Office Sought: State House, District 55

Campaign/Donation Page(s) Reviewed: secure.actblue.com (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Friday, August 28, 2026, Complainant's designee accessed a donation page hosted at secure.actblue.com for Alex Hawkins, identified as a candidate for Michigan State House District 55. The page displays candidate branding, biographical text, and a donation amount selector. This candidate branding, presented together with the donation amount selector soliciting financial support, constitutes express advocacy for Alex Hawkins's election under *Golden v. Yahkind*, bringing the page within MCL 169.247's disclosure requirement. Its only funding-source disclosure is a footer notice stating that the platform itself is “paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” No statement identifying a campaign committee for the candidate, by name or address, appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

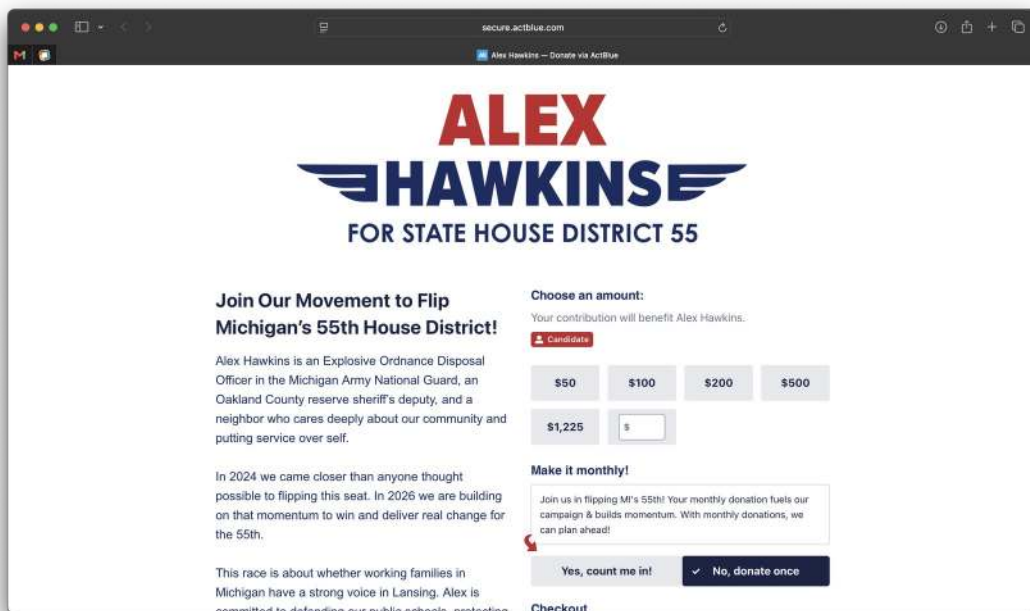
I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

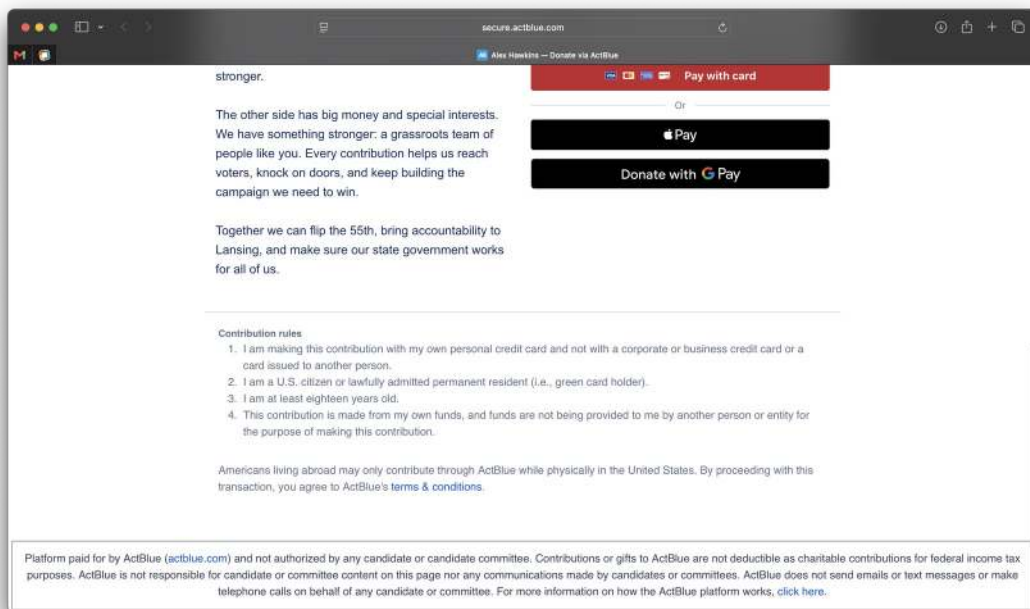
Enclosures: Exhibit A (donation page screenshots)

EXHIBIT A

Screenshots of the *secure.actblue.com* donation page for Alex Hawkins, captured on or about August 28, 2026



Upper portion of donation page



Lower portion of donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Cassie Haynes — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrikmi@gmail.com

2. Respondent Information

Candidate: Cassie Haynes

Committee: Committee to Elect Cassie Haynes, Rachel Goldberg, and Gaurav Kulkarni

Office Sought: Ann Arbor District Library Board of Trustees Member

Campaign/Donation Page(s) Reviewed: aadl2026.com; <https://secure.actblue.com/donate/committee-to-elect-cassie-haynes--rachel-goldberg--and-gau-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Joint Campaign Website (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed the website located at aadl2026.com, the joint campaign website for Cassie Haynes, Rachel Goldberg, and Gaurav Kulkarni, each a candidate for the Ann Arbor District Library Board of Trustees. Cassie Haynes is one of these three candidates. The footer of the page states, in full: "Paid for by the Committee to Elect Cassie Haynes, Rachel Goldberg, and Gaurav Kulkarni." No mailing address for the committee appears anywhere on the page; the only other contact information given is an email address, "hgkforaadl2026@gmail.com."

B. Linked Donation Page (Exhibit B)

Complainant's designee also accessed a linked donation page hosted at <https://secure.actblue.com/donate/committee-to-elect-cassie-haynes--rachel-goldberg--and-gau-1>, captioned "Committee to Elect Cassie Haynes, Rachel Goldberg, and Gaurav Kulkarni," soliciting contributions that the page states will benefit the "Committee to Elect Cassie Haynes, Rachel Goldberg, and Gaurav Kulkarni," identified on the page as a "Political Group." The page's only funding-source disclosure is a footer notice stating that the platform itself is "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee." No mailing address for the committee appears anywhere on the donation page. The donation page's caption and solicitation, both naming the "Committee to Elect Cassie Haynes, Rachel Goldberg, and Gaurav Kulkarni" and directly soliciting contributions to benefit that committee, constitute express advocacy for Cassie Haynes's election within the meaning of *Golden v. Yahkind*, bringing the page within MCL 169.247's disclosure requirement.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and

- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

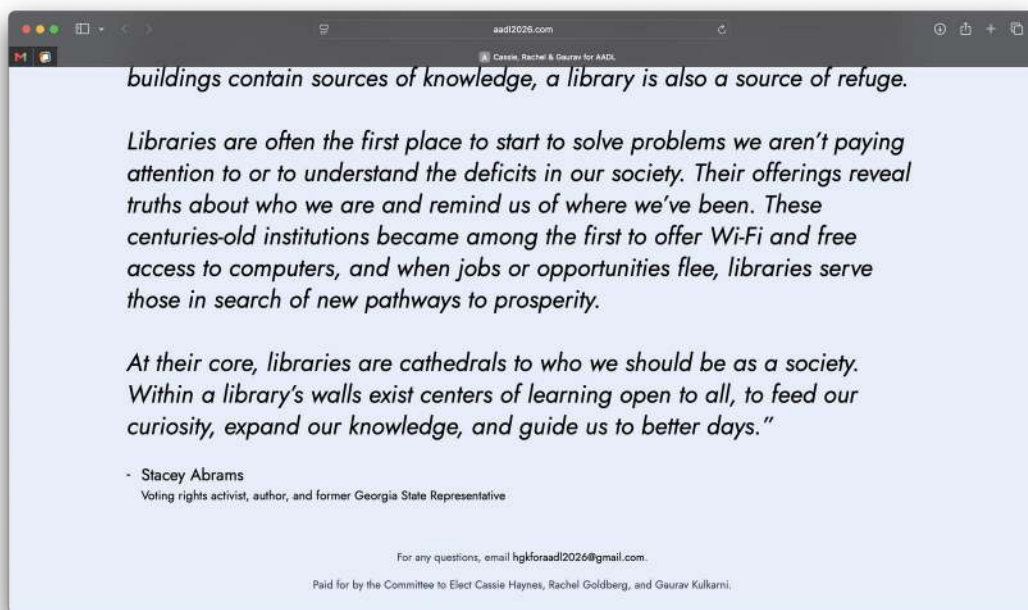
Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (website screenshot); Exhibit B (donation page screenshots)

EXHIBIT A

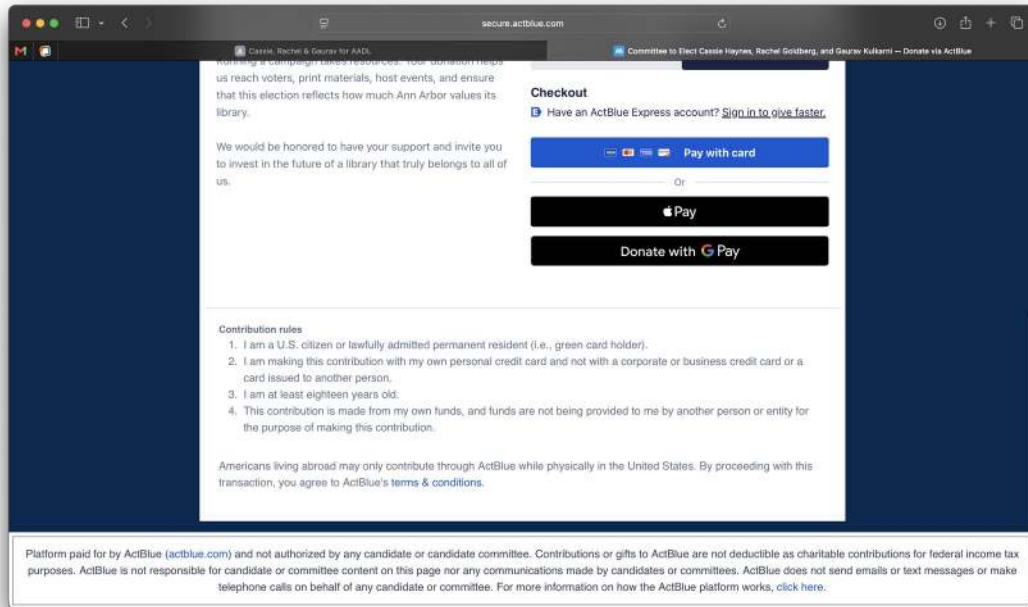
Screenshot of the aadl2026.com footer, captured on or about August 29, 2026



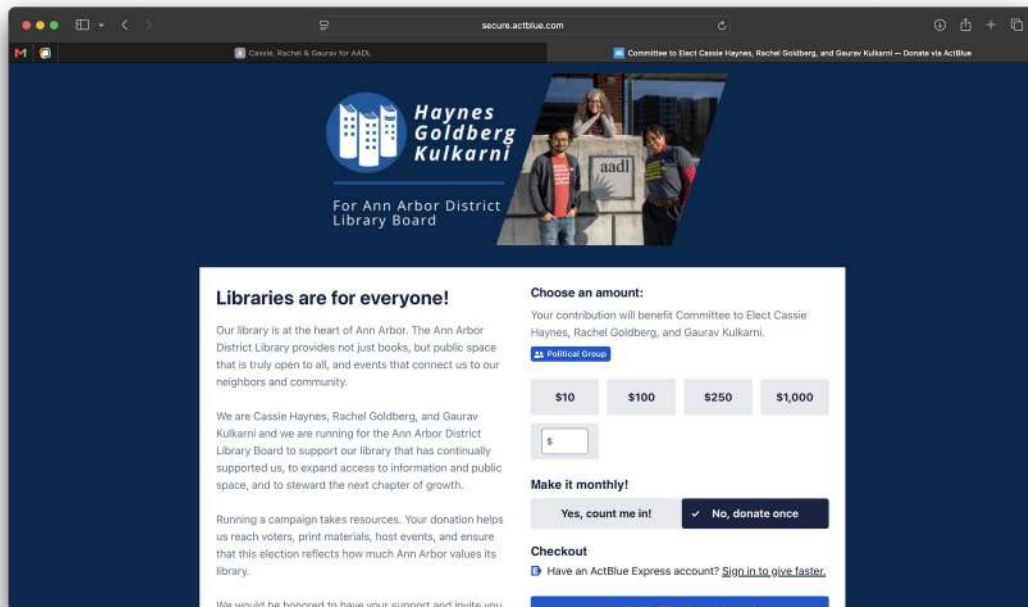
Joint campaign website footer — committee named but no address given

EXHIBIT B

Screenshots of the secure.actblue.com donation page for the Committee to Elect Cassie Haynes, Rachel Goldberg, and Gaurav Kulkarni, captured on or about August 29, 2026



Donation page header — committee identified as a “Political Group,” no address given



Donation page footer — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Kevin Hertel — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Kevin Hertel

Committee: Not identified by name in the material reviewed

Office Sought: State Senate, District 12

Campaign/Donation Page(s) Reviewed: kevinhertelforsenate.com;
<https://secure.actblue.com/donate/kevin-hertel-for-state-senate-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed a donation page hosted at <https://secure.actblue.com/donate/kevin-hertel-for-state-senate-1> and titled “Kevin Hertel for State Senate,” soliciting contributions to Kevin Hertel, a candidate for Michigan State Senate, District 12. The page displays a lengthy first-person message from the candidate signed “Kevin,” but contains no “Paid for by” statement identifying any committee and no address of any kind. This page's title, “Kevin Hertel for State Senate,” together with the candidate's first-person message soliciting support, constitutes express advocacy for his election under *Golden v. Yahkind* and brings the page within MCL 169.247's disclosure requirement.

Scrolling to the bottom of the same donation page, the only funding-source disclosure present is a boxed notice stating that the platform itself is “paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” No statement identifying a campaign committee for Kevin Hertel, by name or address, appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

Enclosures: Exhibit A (donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Kevin Hertel, captured on or about August 29, 2026

This screenshot shows the top half of the ActBlue donation page for Kevin Hertel. The page is titled "Donate to Kevin Hertel for State Senate!" and includes a paragraph about the 12th District. It features a "Choose an amount" section with buttons for \$50, \$100, \$250, \$500, \$1,000, and \$2,450, along with a custom amount input field. There is a "Make it monthly!" section with "Yes, count me in!" and "No, donate once" options. The "Checkout" section includes a link to sign in for an ActBlue Express account and three payment buttons: "Pay with card", "Apple Pay", and "Donate with Google Pay".

Donate to Kevin Hertel for State Senate!

In 2022 we won this critical seat and now we need your help hold it. The 12th District includes all five of the Grosse Pointe communities, St. Clair Shores, Harper Woods, Harrison Township, Mt. Clemens, New Baltimore, Chesterfield Township, Clinton Township, Ira Township and Clay Township including Harsens Island.

I know this district well because I grew up here, Ann and I are raising our family here. Our Lake St. Clair shoreline district is more than lines on a map to me – it is my family's home.

I know the residents of our district are not interested in divisiveness and political games. We want positive action, not negative rhetoric. We want to move forward, not backward. We want to save the things that are working, and change the things that aren't. Because we are better together.

I look forward to working with you to build a better Michigan with world class education for our children, sustainable infrastructure and an economy that creates opportunities for all.

Kevin

Choose an amount:
Your contribution will benefit Kevin Hertel.

[Candidate](#)

\$50 \$100 \$250 \$500
\$1,000 \$2,450

Make it monthly!
☐ Yes, count me in! ☒ No, donate once

Checkout
[Have an ActBlue Express account? Sign in to give faster.](#)

[Pay with card](#)
Or
[Apple Pay](#)
[Donate with Google Pay](#)

ActBlue donation page — candidate message, no disclaimer visible

This screenshot shows the bottom half of the ActBlue donation page for Kevin Hertel. It continues the candidate's message and includes a "Contribution rules" section with four numbered items. Below this is a note about Americans living abroad. At the very bottom, there is a small disclaimer about the platform being paid for by ActBlue and not authorized by the candidate.

divisiveness and political games. We want positive action, not negative rhetoric. We want to move forward, not backward. We want to save the things that are working, and change the things that aren't. Because we are better together.

I look forward to working with you to build a better Michigan with world class education for our children, sustainable infrastructure and an economy that creates opportunities for all.

Kevin

Contribution rules:

1. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person.
2. I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder).
3. This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution.
4. I am at least eighteen years old.

Americans living abroad may only contribute through ActBlue while physically in the United States. By proceeding with this transaction, you agree to ActBlue's [terms & conditions](#).

Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, [click here](#).

Bottom of donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Peter Herzberg — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrikmi@gmail.com

2. Respondent Information

Candidate: Peter Herzberg

Committee: Not identified by name in the material reviewed

Office Sought: State Representative, District 25

Campaign/Donation Page(s) Reviewed: votepeterherzberg.com;
<https://secure.actblue.com/donate/peter-herzberg-for-state-rep-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee’s address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed a donation page hosted at <https://secure.actblue.com/donate/peter-herzberg-for-state-rep-1> and titled “Donate to Peter Herzberg for State Rep,” soliciting contributions to Peter Herzberg, a candidate for Michigan State Representative, District 25. The page displays a campaign yard-sign graphic and donation-amount buttons, but contains no “Paid for by” statement identifying any committee and no address of any kind. This page's title, “Donate to Peter Herzberg for State Rep,” together with its campaign yard-sign graphic and donation-amount buttons soliciting contributions, constitutes express advocacy for his election under *Golden v. Yahkind* and brings the page within MCL 169.247's disclosure requirement.

Scrolling to the bottom of the same donation page, the only funding-source disclosure present is a boxed notice stating that the platform itself is “paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” No statement identifying a campaign committee for Peter Herzberg, by name or address, appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

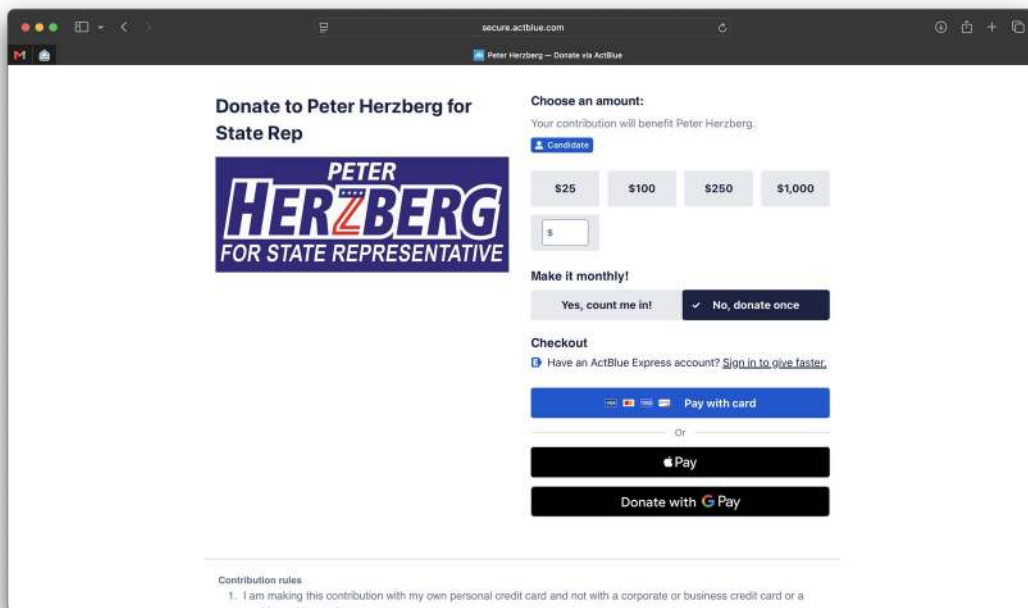
I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

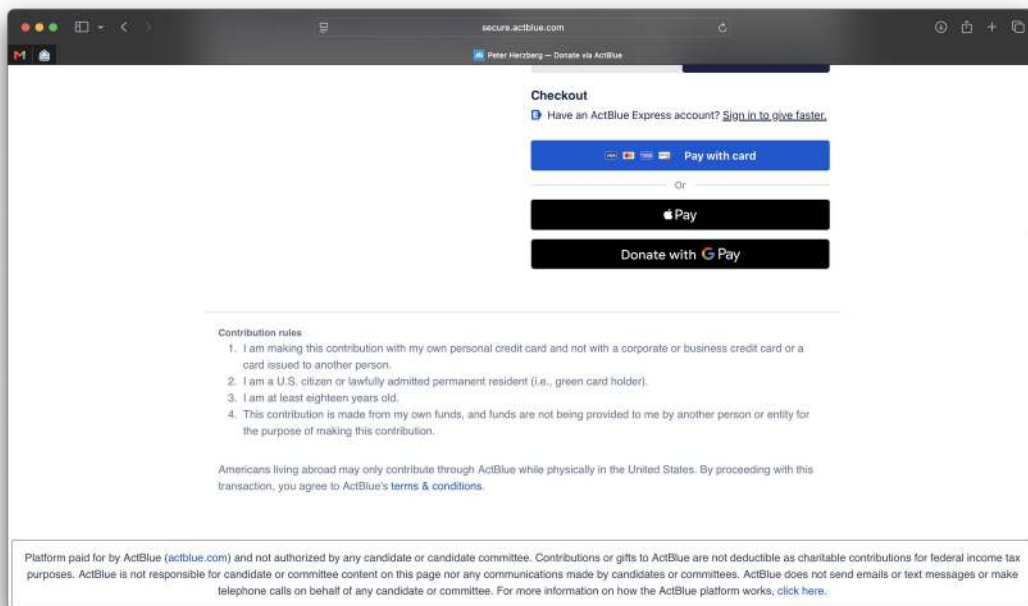
Enclosures: Exhibit A (donation page screenshots)

EXHIBIT A

Screenshots of the *secure.actblue.com* donation page for Peter Herzberg, captured on or about August 29, 2026



ActBlue donation page — campaign graphic, no disclaimer visible



Bottom of donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Ken Heuvelman — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Ken Heuvelman

Committee: Committee to Elect Ken Heuvelman

Office Sought: State Representative, District 64

Campaign/Donation Page(s) Reviewed: heuvelman64th.com; <https://secure.actblue.com/donate/ken-heuvelman-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. ActBlue Donation Page (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the ActBlue donation page located at <https://secure.actblue.com/donate/ken-heuvelman-1>, titled "Ken Heuvelman — Donate via ActBlue." The page displays express campaign branding: a banner graphic combining a Michigan state outline with the stylized script "Ken" and, beneath it, the bold block-letter surname "HEUVELMAN," captioned "FOR STATE REPRESENTATIVE." The page headline reads "Donate to the Committee to Elect Ken Heuvelman," and the accompanying solicitation text states: "Your donation helps, me, Ken Heuvelman move one step closer to taking control of House District 64. Together we can make sure we protect Michiganders way of living from ineffective leadership, political extremists, and corporations that don't care about our great state and it's residents!" The donation module confirms "Your contribution will benefit Ken Heuvelman," with preset amount buttons (\$10, \$100, \$250, \$1,000) and card/Apple Pay/Google Pay options soliciting an immediate financial contribution.

The page heading "Donate to the Committee to Elect Ken Heuvelman" suggests the committee may be named along those lines, but Complainant's designee could not confirm this as the committee's precise, formally registered name from the material reviewed, and in any event no committee address of any kind — matched to that name or any other — appears anywhere on the page. The only disclosure present is ActBlue's generic platform-wide boilerplate at the bottom of the page: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, click here." No "Paid for by [Committee], [Address]" statement satisfying MCL 169.247(1) appears anywhere on this express-advocacy donation page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

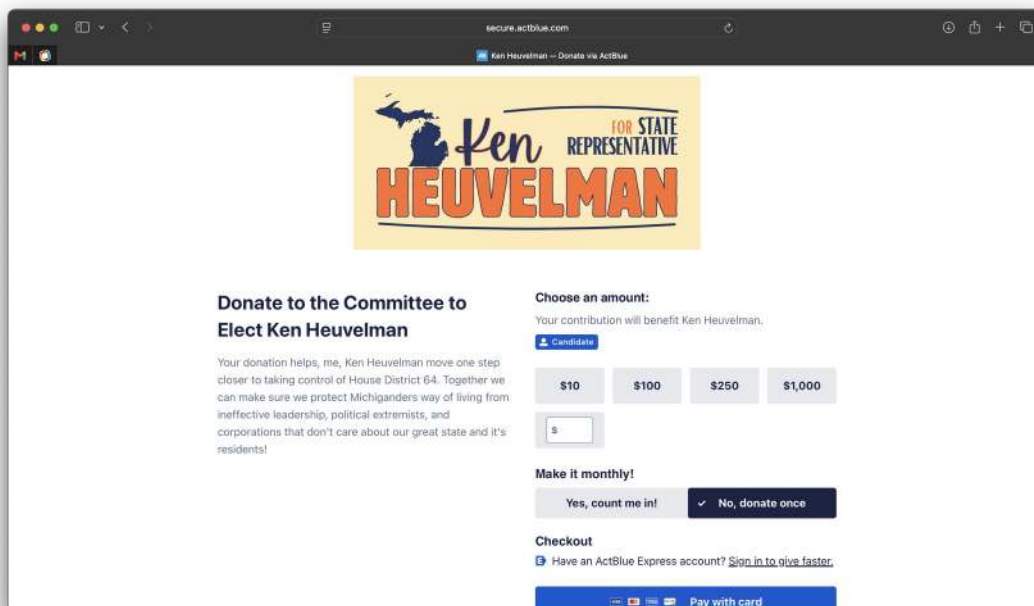
Printed Name: Vance Patrick

Date: August 31st, 2026

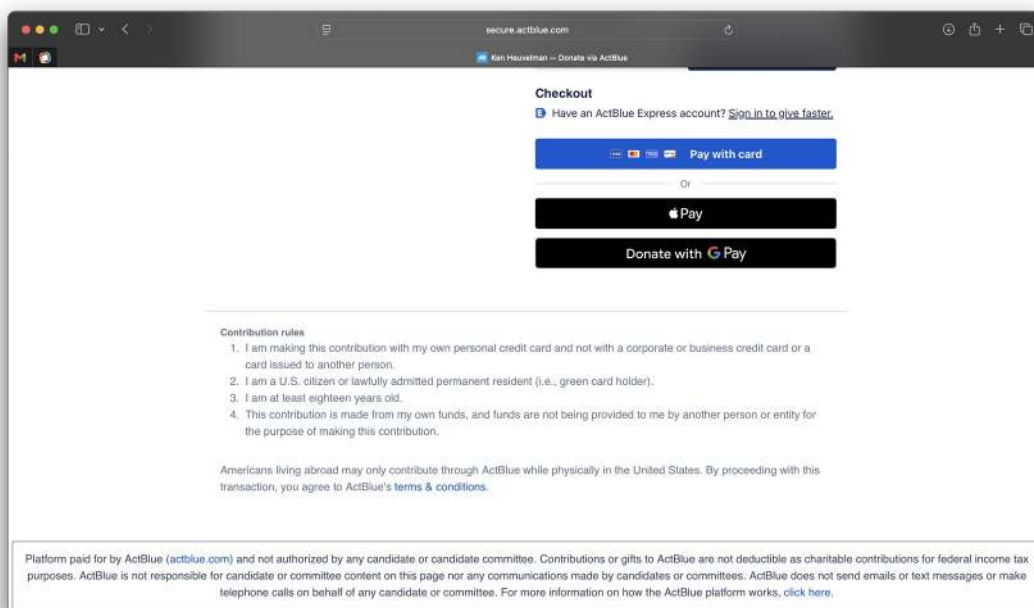
Enclosures: Exhibit A (ActBlue donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Ken Heuvelman, captured on or about August 31, 2026



Top of donation page — "Ken HEUVELMAN FOR STATE REPRESENTATIVE" campaign banner and "Donate to the Committee to Elect Ken Heuvelman" heading



Bottom of page — only ActBlue's generic "Platform paid for by ActBlue" boilerplate notice appears; no committee address

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Greg Hill — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Greg Hill

Committee: Committee to Elect Greg Hill

Office Sought: Not explicitly stated on the page reviewed (page slogan reads “From the Sideline to the Senate Floor,” implying a State Senate campaign)

Campaign/Donation Page(s) Reviewed: greghillformichigan.com

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Friday, August 28, 2026, Complainant's designee accessed the website located at greghillformichigan.com for Greg Hill. The page's footer states “Paid for Committee to Elect Greg Hill,” followed by a notice that the site is “Powered and secured by Wix.” The footer identifies a committee name but omits the word “by” between “for” and the committee's name, and does not include any mailing address for the committee anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

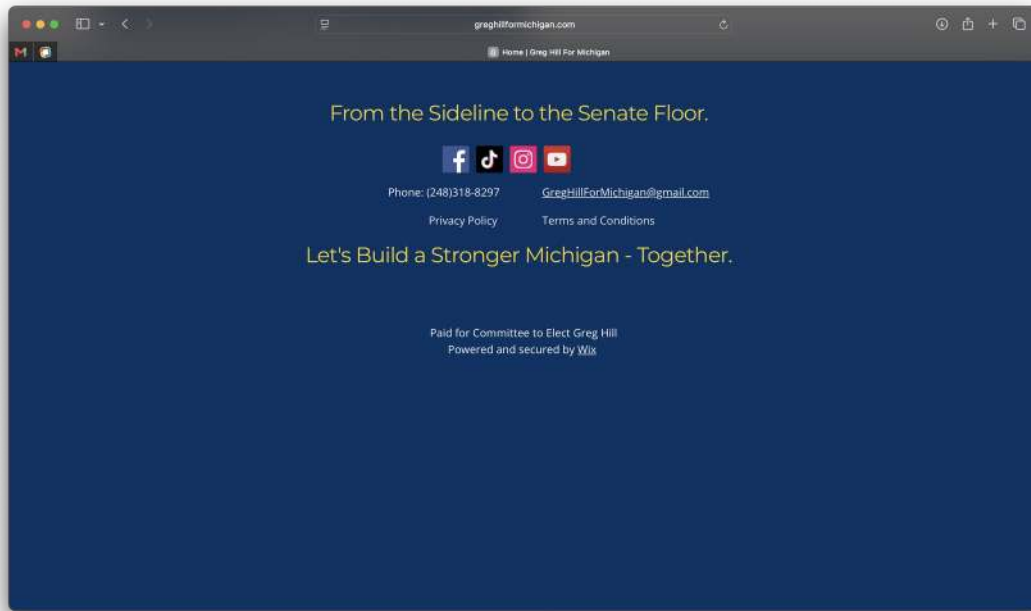
I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

Enclosures: Exhibit A (website screenshot)

EXHIBIT A

Screenshot of the greghillformichigan.com footer, captured on or about August 28, 2026



Website footer — malformed disclaimer, missing “by” and no address

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against AnnMarie Horseman — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: AnnMarie Horseman

Committee: Not identified by name in the material reviewed

Office Sought: State Representative, District 95

Campaign/Donation Page(s) Reviewed: annmariehorseman.com;
<https://secure.actblue.com/donate/annmarie-horseman-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. ActBlue Donation Page (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the donation page located at secure.actblue.com, titled "AnnMarie Horseman — Donate via ActBlue," which is linked from and used to solicit contributions for the campaign of AnnMarie Horseman, a candidate for State Representative in District 95. The page displays express campaign advocacy, including the header "AnnMarie Horseman for MI State Rep HD95," followed by the statements "We're flipping the House!" and "Help us win the 95th!" The page further states, "Your contribution will help buy campaign literature, ads, direct mailers, and snacks for hardworking volunteers!" and expressly solicits contributions with the text, "Pitch in today to support AnnMarie Horseman for State Representative. Together, we can move our community forward." The page then presents a "Choose an amount" contribution module with preset donation buttons (\$9.50, \$25, \$50, \$95, \$250, \$500, \$950) and a "Make it monthly!" option, followed by payment fields.

Complainant's designee reviewed the entirety of the page, including its footer, and found no "Paid for by" statement identifying a committee name and address anywhere on the page. The only disclaimer-type text appearing on the page is ActBlue's own standard platform notice, set off in a bordered box at the very bottom of the page, which reads: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, [click here](#)." This is ActBlue's generic, platform-wide disclosure of its own status as a conduit and, by its own terms, disclaims authorization by "any candidate or candidate committee." It does not identify a committee name or address for the Horseman campaign, and no committee-specific "Paid for by [Committee Name], [Address]" statement appears anywhere on the page reviewed.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

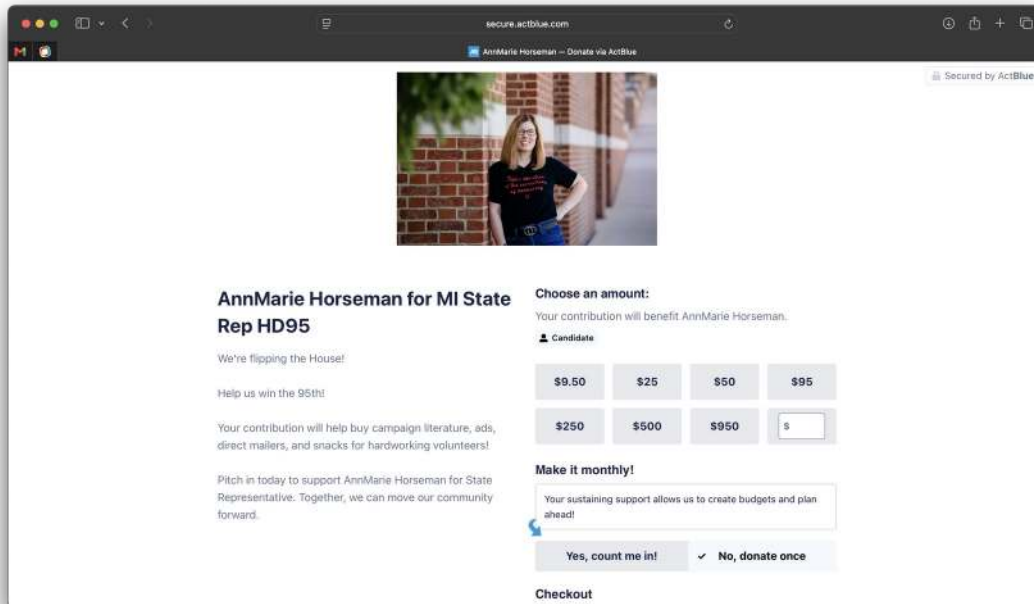
Printed Name: Vance Patrick

Date: August 31st, 2026

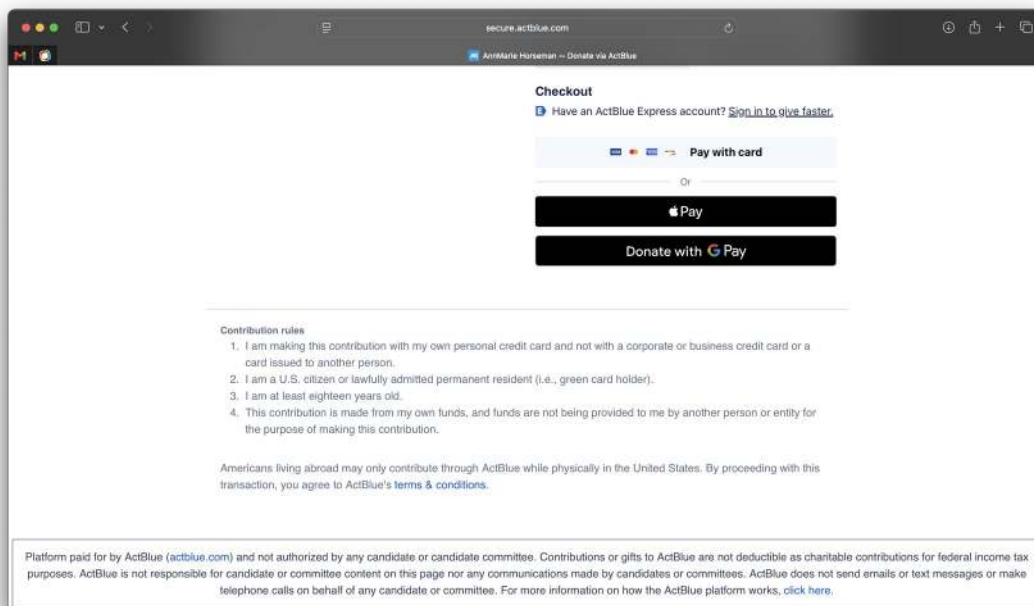
Enclosures: Exhibit A (ActBlue donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for AnnMarie Horseman, captured on or about August 31, 2026



Upper portion of donation page, showing express advocacy header "AnnMarie Horseman for MI State Rep HD95" and solicitation text



Lower portion of donation page — only ActBlue's generic platform notice appears; no committee-specific disclaimer

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Brian Irizarry — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Brian Irizarry

Committee: Not identified by name in the material reviewed

Office Sought: State Representative, District 110

Campaign/Donation Page(s) Reviewed: voteirizarry.com; <https://secure.actblue.com/donate/brian-irizarry-2> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the website located at voteirizarry.com for Brian Irizarry, a candidate for State Representative in District 110. The homepage prominently displays a campaign logo/header graphic combining the candidate's name with express "elect me" branding: a blue banner reading "BRIAN IRIZARRY," accompanied by a graphic outline of Michigan's Upper Peninsula, red stars, and the text "FOR STATE REPRESENTATIVE." This same logo graphic repeats in the footer of the page. The site's navigation bar includes the links "Campaign Updates," "Meet the Candidate," "Legislative Blog," "Contact Form," and "Home." Body text on the page solicits support for the candidate's platform, stating "Support the important work of" followed by bullet points "Creating local jobs" and "Supporting local families," and the statement "It's a long road ahead."

Complainant's designee reviewed the footer of the page in full and found no "Paid for by [Committee], [Address]" disclosure of any kind. The footer contains only a Facebook icon, the repeated "BRIAN IRIZARRY ... FOR STATE REPRESENTATIVE" logo graphic, and the text "Made with Squarespace" (a website-builder attribution, not a campaign finance disclaimer). No committee name and no address appear anywhere on the page reviewed.

B. ActBlue Donation Page (Exhibit B)

Complainant's designee also accessed the linked donation page at secure.actblue.com, titled "Brian Irizarry — Donate via ActBlue." The page repeats the same "BRIAN IRIZARRY ... FOR STATE REPRESENTATIVE" campaign logo graphic at the top, followed by the heading "Donate to Brian Irizarry" and a "Choose an amount" contribution module (with preset donation buttons of \$10, \$20, \$50, \$100, \$250) and a "Make it monthly!" option, expressly soliciting financial contributions to the candidate's campaign.

As with the campaign website, no committee-specific "Paid for by [Committee], [Address]" statement appears anywhere on this donation page. The only disclaimer-type text on the page is ActBlue's standard platform notice at the bottom, reading: "Platform paid for by ActBlue (actblue.com) and not authorized by

any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, click [here](#)." This generic ActBlue boilerplate is the platform's own disclosure and does not identify any committee name or address for the Irizarry campaign.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

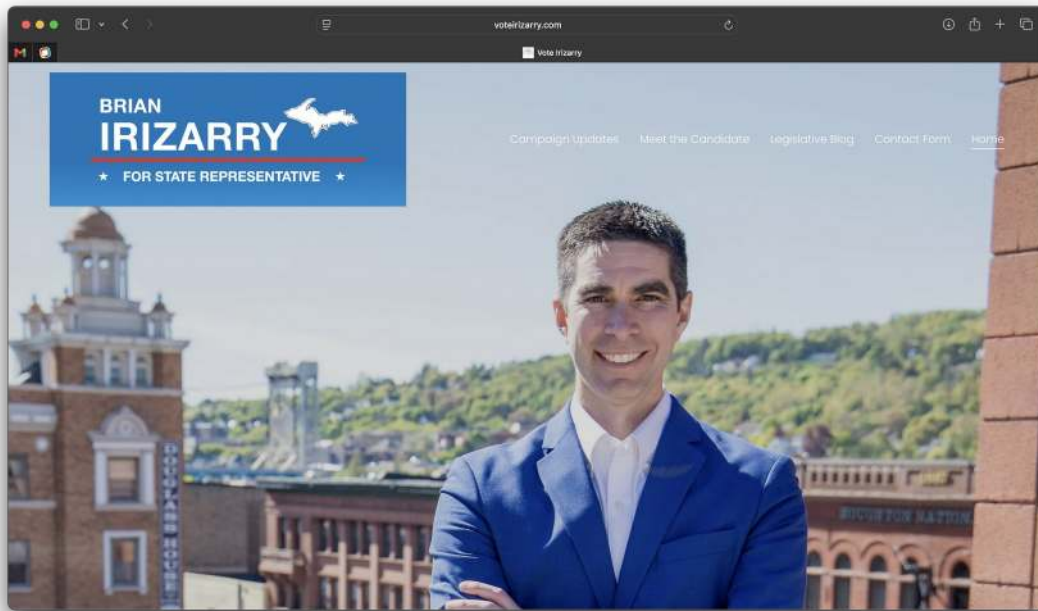
Printed Name: Vance Patrick

Date: August 31st, 2026

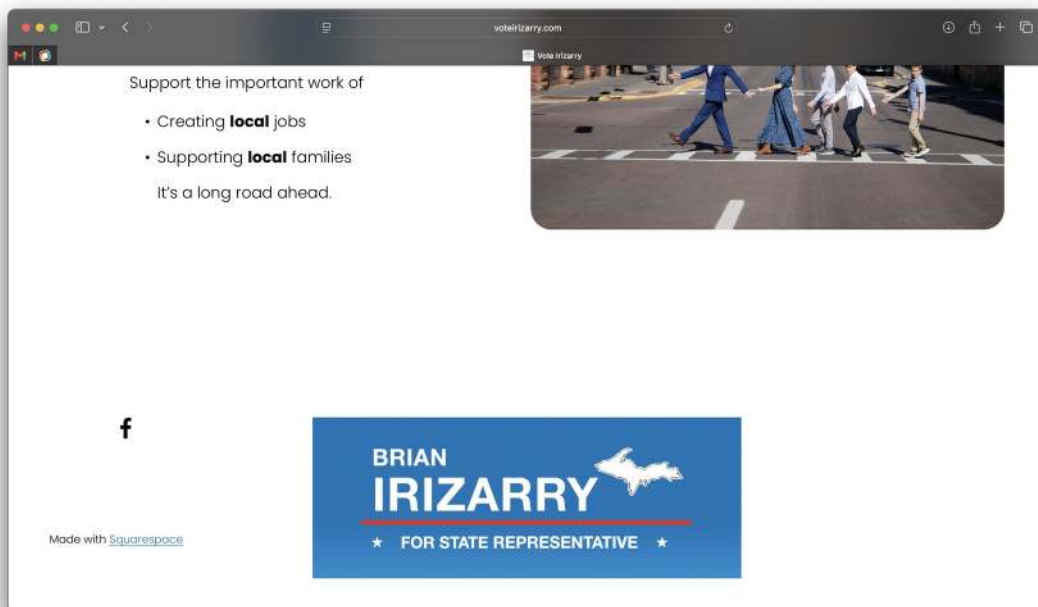
Enclosures: Exhibit A (campaign website screenshots); Exhibit B (ActBlue donation page screenshots)

EXHIBIT A

Screenshots of the voteirizarry.com campaign website, captured on or about August 31, 2026



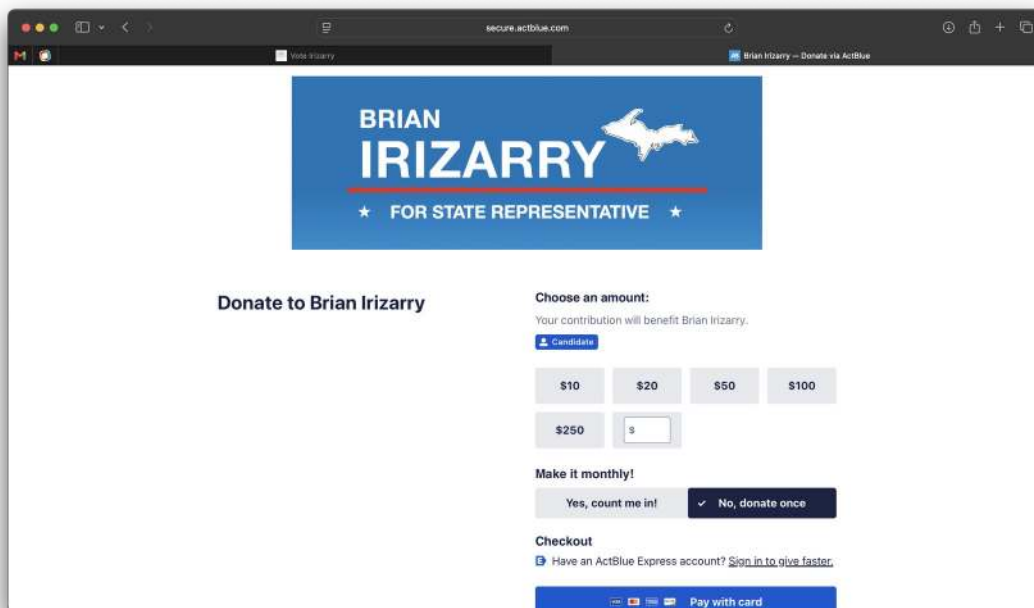
Homepage header, showing "BRIAN IRIZARRY ... FOR STATE REPRESENTATIVE" logo and navigation menu



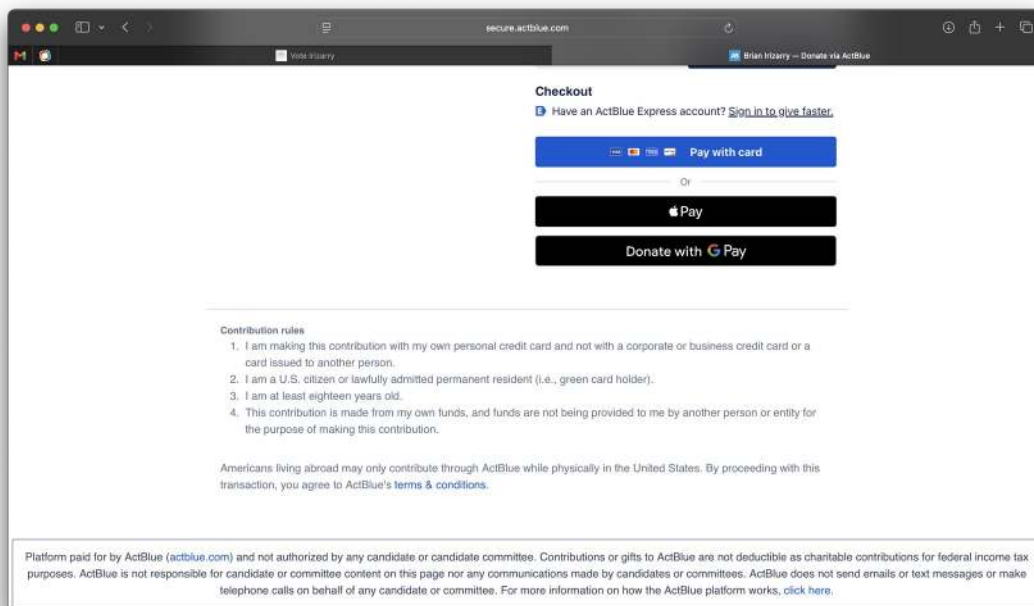
Page footer — no "Paid for by" disclaimer of any kind; only a Squarespace attribution and repeated campaign logo

EXHIBIT B

Screenshots of the secure.actblue.com donation page for Brian Irizarry, captured on or about August 31, 2026



Upper portion of donation page, showing campaign logo and "Donate to Brian Irizarry" solicitation



Lower portion of donation page — only ActBlue's generic platform notice appears; no committee-specific disclaimer

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Rachel M. Keys — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Rachel M. Keys

Committee: Not identified by name in the material reviewed

Office Sought: State Representative, District 108

Campaign/Donation Page(s) Reviewed: votemikeys.com; <https://secure.actblue.com/donate/rachel-keys-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee’s address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. ActBlue Donation Page (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the donation page located at secure.actblue.com, titled "Rachel Keys — Donate via ActBlue," linked from and used to solicit contributions for the campaign of Rachel M. Keys, a candidate for State Representative in District 108. The page displays the heading "Donate to Rachel Keys!" and expressly solicits support with the text: "Pitch in today to support Rachel Keys for Michigan House of Representatives - District 108. Together, we can move our community forward." The page then presents a "Choose an amount" contribution module with preset donation buttons (\$5, \$10, \$20, \$25, \$50, \$100, \$200) and a "Make it monthly!" option with the caption "Your sustaining support allows us to create budgets and plan ahead!"

Complainant's designee reviewed the page in its entirety, including the footer, and found no "Paid for by [Committee], [Address]" disclosure identifying a committee name and address. The only disclaimer-type text present is ActBlue's standard, platform-wide notice at the bottom of the page: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, click [here](#)." This is ActBlue's own generic disclosure and does not name any committee or address for the Keys campaign.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and

- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

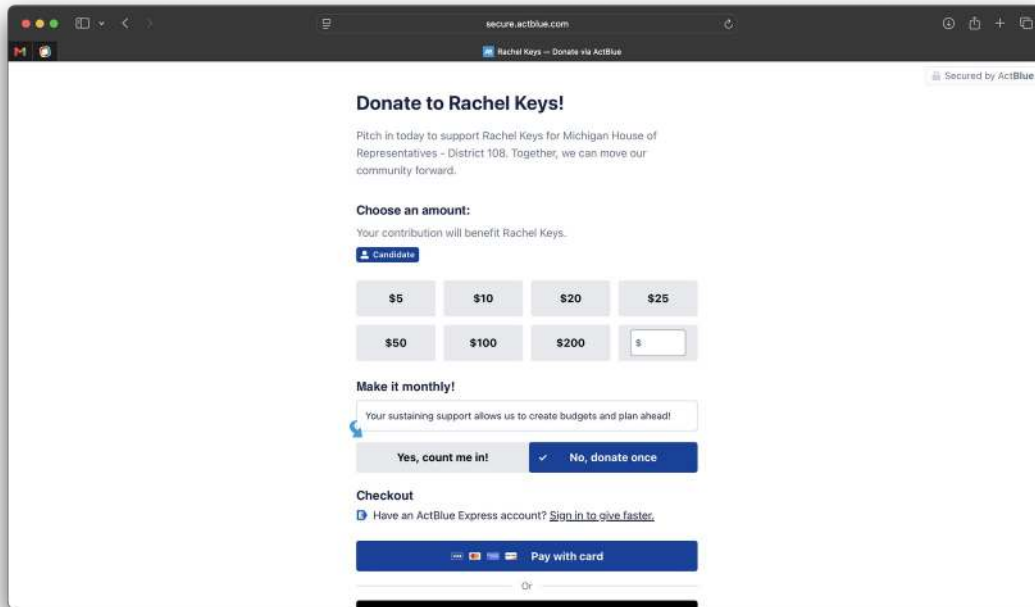
Printed Name: Vance Patrick

Date: August 31st, 2026

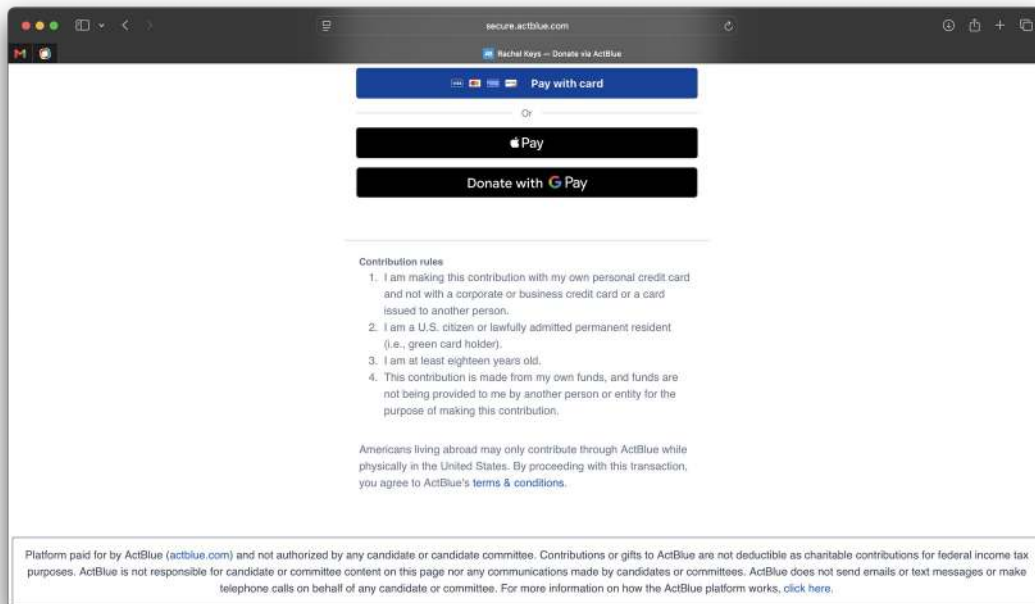
Enclosures: Exhibit A (ActBlue donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Rachel M. Keys, captured on or about August 31, 2026



Upper portion of donation page, showing "Donate to Rachel Keys!" heading and express solicitation text



Lower portion of donation page — only ActBlue's generic platform notice appears; no committee-specific disclaimer

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Gaurav Kulkarni — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Gaurav Kulkarni

Committee: Committee to Elect Cassie Haynes, Rachel Goldberg, and Gaurav Kulkarni

Office Sought: Ann Arbor District Library Board of Trustees Member

Campaign/Donation Page(s) Reviewed: aadl2026.com; <https://secure.actblue.com/donate/committee-to-elect-cassie-haynes--rachel-goldberg--and-gau-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Joint Campaign Website (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed the website located at aadl2026.com, the joint campaign website for Cassie Haynes, Rachel Goldberg, and Gaurav Kulkarni, each a candidate for the Ann Arbor District Library Board of Trustees. Gaurav Kulkarni is one of these three candidates. The footer of the page states, in full: “Paid for by the Committee to Elect Cassie Haynes, Rachel Goldberg, and Gaurav Kulkarni.” No mailing address for the committee appears anywhere on the page; the only other contact information given is an email address, “hgkforaadl2026@gmail.com.”

B. Linked Donation Page (Exhibit B)

Complainant's designee also accessed a linked donation page hosted at <https://secure.actblue.com/donate/committee-to-elect-cassie-haynes--rachel-goldberg--and-gau-1>, captioned “Committee to Elect Cassie Haynes, Rachel Goldberg, and Gaurav Kulkarni,” soliciting contributions that the page states will benefit the “Committee to Elect Cassie Haynes, Rachel Goldberg, and Gaurav Kulkarni,” identified on the page as a “Political Group.” The page's only funding-source disclosure is a footer notice stating that the platform itself is “Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” No mailing address for the committee appears anywhere on the donation page. The donation page's caption and solicitation, both naming the “Committee to Elect Cassie Haynes, Rachel Goldberg, and Gaurav Kulkarni” and directly soliciting contributions to benefit that committee, constitute express advocacy for Gaurav Kulkarni's election within the meaning of *Golden v. Yahkind*, bringing the page within MCL 169.247's disclosure requirement.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and

- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

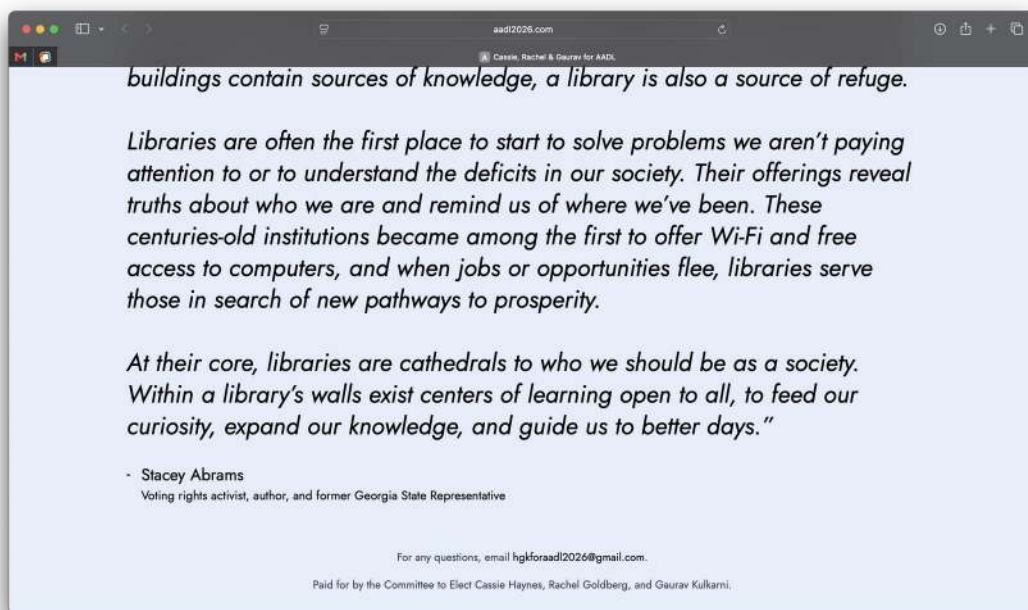
Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (website screenshot); Exhibit B (donation page screenshots)

EXHIBIT A

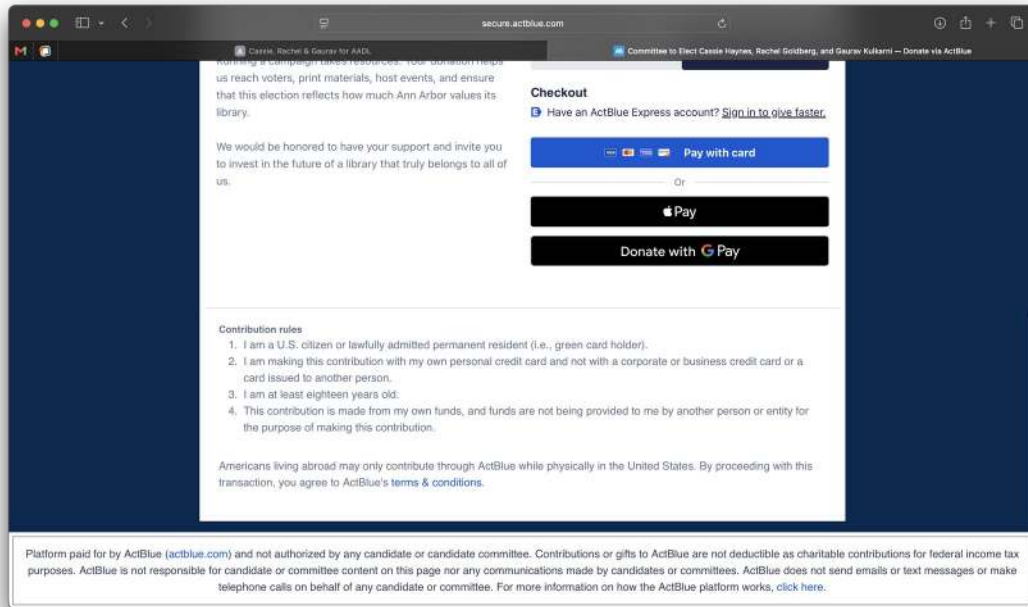
Screenshot of the aadl2026.com footer, captured on or about August 29, 2026



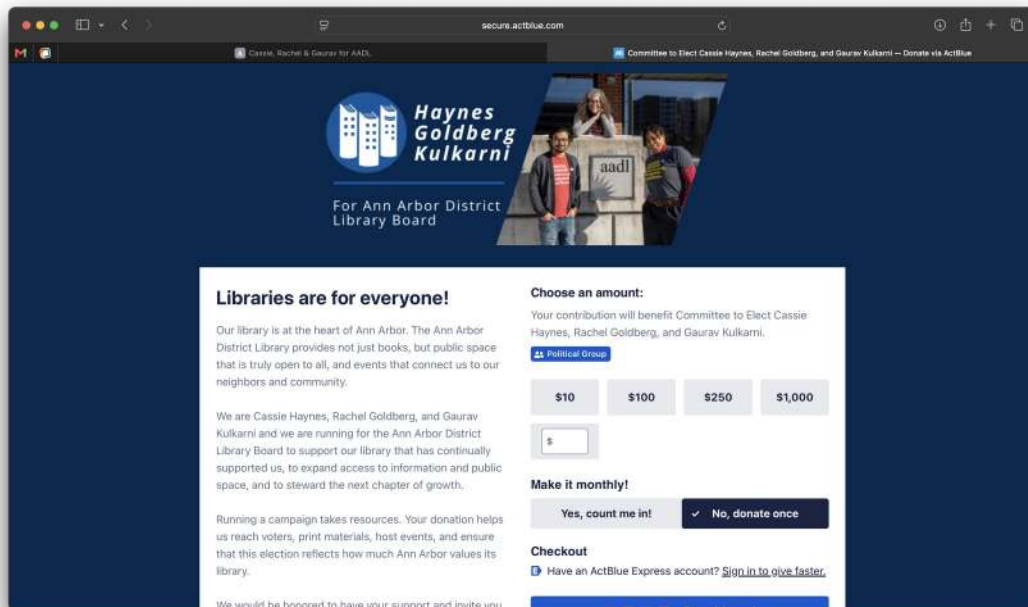
Joint campaign website footer — committee named but no address given

EXHIBIT B

Screenshots of the secure.actblue.com donation page for the Committee to Elect Cassie Haynes, Rachel Goldberg, and Gaurav Kulkarni, captured on or about August 29, 2026



Donation page header — committee identified as a “Political Group,” no address given



Donation page footer — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Brendan Leddy — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Brendan Leddy

Committee: the Committee to Elect Brendan P. Leddy

Office Sought: State Representative, District 52 (State House 52)

Campaign/Donation Page(s) Reviewed: electleddy.org

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Friday, August 28, 2026, Complainant's designee accessed the website located at electleddy.org for Brendan Leddy, a candidate for Michigan State House District 52. The footer of the page states “Paid for with Regulated Funds by the Committee to Elect Brendan P. Leddy.” No mailing address for the committee appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

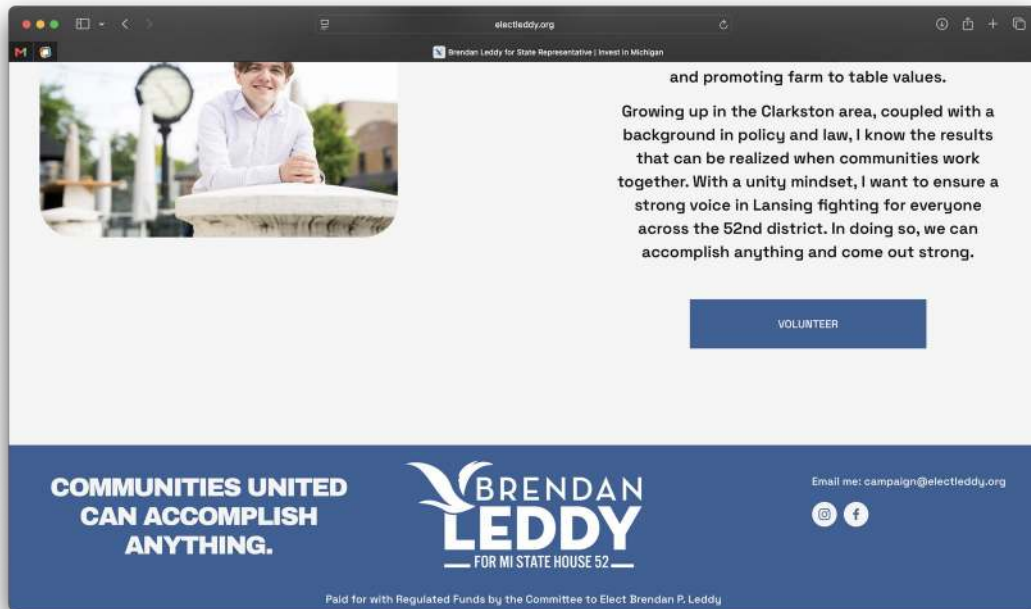
Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (website screenshot)

EXHIBIT A

Screenshot of the electleddy.org footer, captured on or about August 28, 2026



Website footer — committee named but no address given

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Sharon MacDonell — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Sharon MacDonell

Committee: Not identified by name in the material reviewed

Office Sought: State Representative, District 56 (State House District 56)

Campaign/Donation Page(s) Reviewed: secure.actblue.com (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Friday, August 28, 2026, Complainant's designee accessed a donation page hosted at secure.actblue.com for Sharon MacDonell, a candidate for Michigan State House District 56. The page displays campaign branding, biographical and policy content, and a donation amount selector. This campaign branding, paired with the donation amount selector soliciting contributions, constitutes express advocacy for Sharon MacDonell's election under *Golden v. Yahkind*, bringing the page within MCL 169.247's disclosure requirement. Its only funding-source disclosure is a footer notice stating that the platform itself is “paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” No statement identifying a campaign committee for the candidate, by name or address, appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

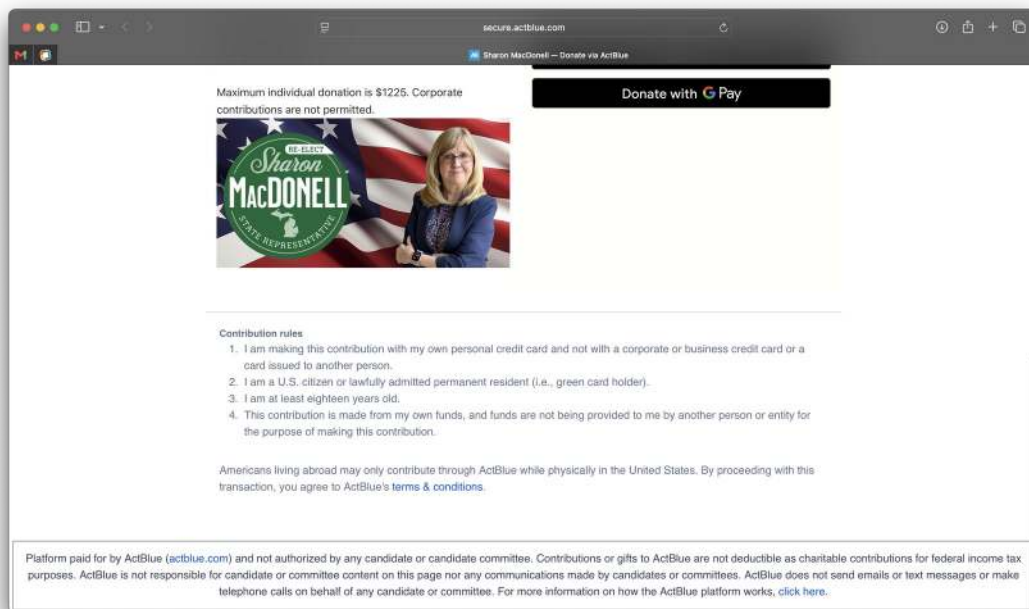
Enclosures: Exhibit A (donation page screenshots)

EXHIBIT A

Screenshots of the *secure.actblue.com* donation page for Sharon MacDonell, captured on or about August 28, 2026



Upper portion of donation page



Lower portion of donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Melanie Macey — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Melanie Macey

Committee: Committee to Elect Melanie Macey

Office Sought: State Representative (district not stated in the material reviewed)

Campaign/Donation Page(s) Reviewed: melaniemacey.com

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the website located at melaniemacey.com for Melanie Macey, a candidate for State Representative. The footer of the page contains a distinct, bordered box, set apart from the surrounding footer content by its own rectangular outline, stating only “PAID FOR BY THE COMMITTEE TO ELECT MELANIE MACEY.” No address appears inside that bordered disclosure box.

Below and outside that bordered box, in a separate, unbordered portion of the footer, the page displays a street address: “729 N. Wilson Ave., Royal Oak, MI 48067.” That address is not part of, adjacent within, or visually unified with the bordered “Paid for by” statement — it appears as a freestanding block beneath it, alongside an unrelated copyright line reading “Melanie Macey © 2026.” Because the “Paid for by” identification and the committee's address do not appear together as a single unified statement, the disclosure fails to satisfy MCL 169.247(1).

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

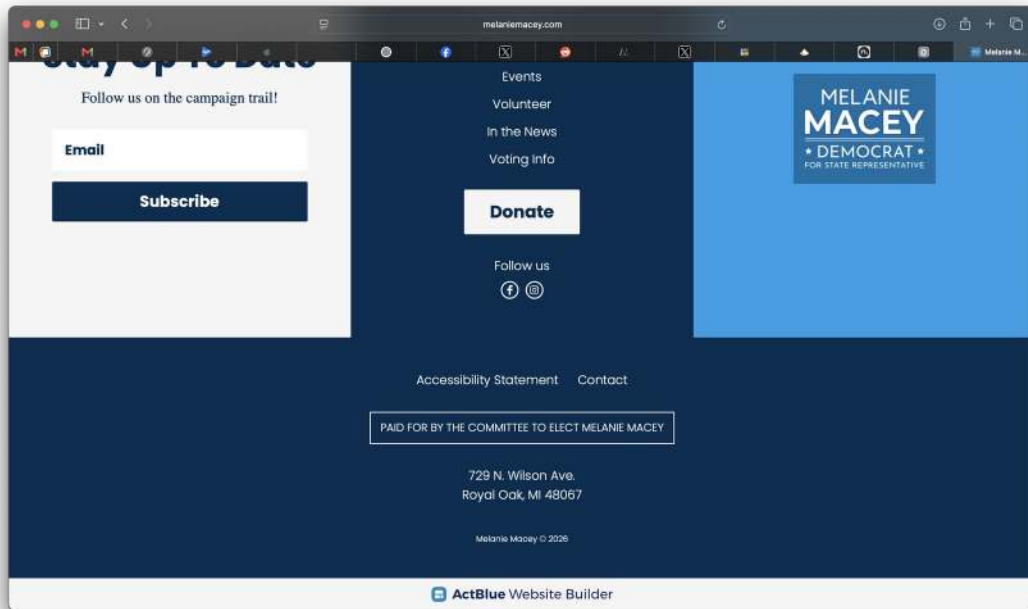
Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (website footer screenshot)

EXHIBIT A

Screenshot of the melaniemacey.com footer, captured on or about August 31, 2026



Website footer — the bordered “Paid for by” disclosure box contains no address; the street address appears separately, outside the box

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Richard Mack — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Richard Mack

Committee: Committee to Elect Richard Mack for WSU BOG

Office Sought: Wayne State University Board of Governors

Campaign/Donation Page(s) Reviewed: richardmackforwsu.com

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed the website located at richardmackforwsu.com for Richard Mack, a candidate for Governor (Board of Governors) of Wayne State University. The footer of the page states, in full, “Published by Committee to Elect Richard Mack for WSU BOG,” below a line inviting visitors to “Email us for a meeting with Richard.” This is the only statement on the page identifying a committee.

The footer statement uses “Published by,” not “Paid for by,” and is not accompanied by any street address, post office box, or other mailing address for the committee anywhere on the page. No “Paid for by [Committee Name], [address]” statement of the kind required by MCL 169.247(1) appears on the website.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

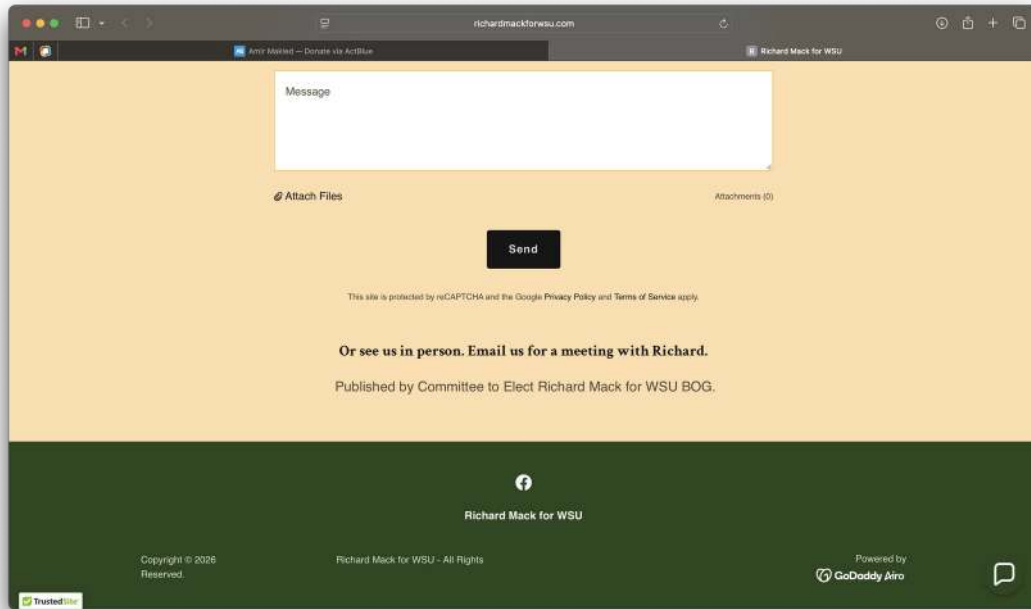
Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (website screenshot)

EXHIBIT A

Screenshot of the richardmackforwsu.com website footer for Richard Mack, captured on or about August 29, 2026



Website footer — committee named via “Published by,” but no address anywhere on the page

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Jan Maino — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrikmi@gmail.com

2. Respondent Information

Candidate: Jan Maino

Committee: Jan Maino for Michigan

Office Sought: State Representative, District 46

Campaign/Donation Page(s) Reviewed: mainoformichigan.com; <https://secure.actblue.com/donate/jan-maino-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed a donation page hosted at <https://secure.actblue.com/donate/jan-maino-1> and titled “Help Elect Jan Maino to Michigan's 46th House District!,” soliciting contributions to Jan Maino, a candidate for Michigan State Representative, District 46. Further down the page, a separate italicized sentence unrelated to any funding-source disclosure states: “If you'd rather send a check, please mail to 'Jan Maino for Michigan' at PO Box 1285, Jackson, MI 49204.” This is the only place the committee name “Jan Maino for Michigan” or any address appears on the page, and it is presented solely as check-mailing instructions to donors, not as a “Paid for by” identification statement. This page's title, “Help Elect Jan Maino to Michigan's 46th House District!,” is a direct call to action soliciting the candidate's election, constituting express advocacy under *Golden v. Yahkind* and bringing the page within MCL 169.247's disclosure requirement.

At the bottom of the same page, the only funding-source disclosure present is a boxed notice stating that the platform itself is “paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” No single unified statement combining “Paid for by” language with the committee's name and address appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (donation page screenshots)

EXHIBIT A

Screenshots of the *secure.actblue.com* donation page for Jan Maino, captured on or about August 29, 2026

Jan Maino
For State Rep

Help Elect Jan Maino to Michigan's 46th House District!

For her entire career, Jan has served individuals and families in her community—both directly and through leadership, board service, and volunteer work. As a licensed social worker, nonprofit executive, and community volunteer, she has spent decades working alongside families, educators, healthcare providers, and service organizations to strengthen systems and expand opportunity.

Whether providing direct support to families in crisis, leading behavioral health and family-serving nonprofits, or volunteering her time on local boards and initiatives, Jan's work has always been rooted in showing up, listening, and helping people navigate real challenges with dignity and respect.

Choose an amount:

Your contribution will benefit Jan Maino.

[Candidate](#)

\$10	\$25	\$50	\$100
\$250	\$500	\$1,225	\$

Make it monthly!

☐ Yes, count me in! ☒ No, donate once

Checkout

Have an ActBlue Express account? [Sign in to give faster.](#)

[Pay with card](#)

ActBlue donation page — candidate description, no disclaimer visible

Checkout

Have an ActBlue Express account? [Sign in to give faster.](#)

[Pay with card](#)

Or

[Apple Pay](#)

[Donate with Google Pay](#)

Contribution rules

1. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person.
2. I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder).
3. I am at least eighteen years old.
4. This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution.

Americans living abroad may only contribute through ActBlue while physically in the United States. By proceeding with this transaction, you agree to ActBlue's [terms & conditions](#).

Platform paid for by ActBlue ([actblue.com](#)) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, [click here](#).

Check-mailing instructions naming committee and PO Box, followed by ActBlue's generic platform notice — no unified “Paid for by” statement

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Amir Makled — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Amir Makled

Committee: Not identified by name in the material reviewed

Office Sought: Regent of the University of Michigan

Campaign/Donation Page(s) Reviewed: amirmakled.com;
<https://secure.actblue.com/donate/amirmakled> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed a donation page hosted at <https://secure.actblue.com/donate/amirmakled> and titled “Amir Makled for U of M Regent,” soliciting contributions to Amir Makled, a candidate for Regent of the University of Michigan. The page displays campaign branding and a description of the candidate's platform, but contains no “Paid for by” statement identifying any committee and no address of any kind. This page's title, “Amir Makled for U of M Regent,” together with its campaign branding promoting his candidacy, constitutes express advocacy for his election under *Golden v. Yahkind*, bringing the page within MCL 169.247's disclosure requirement.

Scrolling to the bottom of the same donation page, the only funding-source disclosure present is a boxed notice stating that the platform itself is “paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” No statement identifying a campaign committee for Amir Makled, by name or address, appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

Enclosures: Exhibit A (donation page screenshots)

EXHIBIT A

Screenshots of the *secure.actblue.com* donation page for Amir Makled, captured on or about August 29, 2026

The screenshot shows the ActBlue donation page for Amir Makled. The header features the name "AMIR MAKLED" in large yellow letters, with "for U of M REGENT" in white below it. The page is divided into two main columns. The left column contains the campaign description: "Amir Makled for U of M Regent" and "Amir is running to bring accountability, inclusivity, accessibility, and free speech back to the University of Michigan's leadership." It also states that contributions help build a people-powered campaign and that the donor is "Chipping in today to support principled, independent leadership." The right column is titled "Choose an amount:" and lists several donation options: \$10, \$100, \$500, \$1,000, \$2,500, \$5,000, \$8,325, and a custom amount field. Below these is a "Make it monthly!" section with two radio buttons: "Yes, count me in!" (selected) and "No, donate once". A "Checkout" section follows, asking if the user has an ActBlue Express account and providing a link to "Sign in to give faster." At the bottom of the right column is a "Pay with card" button.

ActBlue donation page — campaign description, no disclaimer visible

This screenshot shows the bottom portion of the ActBlue donation page. The "Checkout" section is prominent, featuring a "Pay with card" button, an "Or" separator, and buttons for "Apple Pay" and "Donate with Google Pay". Below the payment options is a "Contribution rules" section with four numbered items: 1. "I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person." 2. "I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder)." 3. "I am at least eighteen years old." 4. "This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution." Below the rules, a note states: "Americans living abroad may only contribute through ActBlue while physically in the United States. By proceeding with this transaction, you agree to ActBlue's terms & conditions." At the very bottom, a small disclaimer reads: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, click here."

Bottom of donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Katrina Manetta — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Katrina Manetta

Committee: Committee to Elect Katrina Manetta

Office Sought: State Representative, District 58

Campaign/Donation Page(s) Reviewed: katrinamanetta.com; <https://secure.actblue.com/donate/manetta> (ActBlue donation page); <https://secure.numero.ai/contribute/Chip-in-and-help-flip-HD-58-b4f52fd1-7cdd-49a9-bd1c-6b78117c960b> (Numero donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee’s address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible,

and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. ActBlue Donation Page (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the donation page located at secure.actblue.com, titled "Katrina Manetta — Donate via ActBlue." The page displays an express-advocacy logo graphic reading "KATRINA MANETTA FOR STATE REP" at the top, followed by the heading "Chip in and help flip HD 58" and candidate-authored solicitation text: "I'm Katrina Manetta, & I'm running for State Representative in Michigan's 58th District," continuing with "If you're ready for a new generation of leadership, chip in today. Every gift goes toward knocking more doors and reaching more voters, and it means we win this district together." The page also directs visitors to "katrinamanetta.com" to "[l]earn about the campaign" and to a linked "CAMPAIGN STORE" at store.katrinamanetta.com. A "Choose an amount" module follows, with preset donation buttons (\$26, \$58, \$100, \$250, \$500, \$1,225) and a monthly-giving option.

Complainant's designee reviewed the page in its entirety and found no committee-specific "Paid for by [Committee], [Address]" statement anywhere on this ActBlue page. The only disclaimer-type text present is ActBlue's standard, platform-wide notice at the bottom of the page, reading in relevant part: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. ... ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees." This is ActBlue's own generic disclosure and does not identify the Manetta committee or any address.

B. Numero Donation Page (Exhibit B)

Complainant's designee also accessed a second, separate linked donation page hosted at secure.numero.ai — a different online contribution-processing platform than ActBlue — titled "Chip in and help flip HD 58 - Committee to Elect Katrina Manetta | Numero." This page repeats the same "KATRINA MANETTA FOR STATE REP" campaign logo and the same "Chip in and help flip HD 58" heading and candidate

solicitation text described above ("I'm Katrina Manetta, & I'm running for State Representative in Michigan's 58th District... If you're ready for a new generation of leadership, chip in today..."), together with a "Choose an amount" contribution module.

Near the bottom of the Numero page, Complainant's designee located a bordered disclosure box, separate from any generic platform boilerplate, that reads in full: "Paid for by Committee to Elect Katrina Manetta. Contributions or gifts to Committee to Elect Katrina Manetta are not tax deductible." This statement does identify a committee name — "Committee to Elect Katrina Manetta" — but it contains no street address, post office box, or any other address information whatsoever. No address for the committee appears anywhere else on this page. Because the statutorily required address component is entirely absent from the disclosure — not merely relocated elsewhere on the page, but missing altogether — the statement does not satisfy MCL 169.247(1)'s requirement of a "Paid for by [Committee Name], [Address]" identification.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

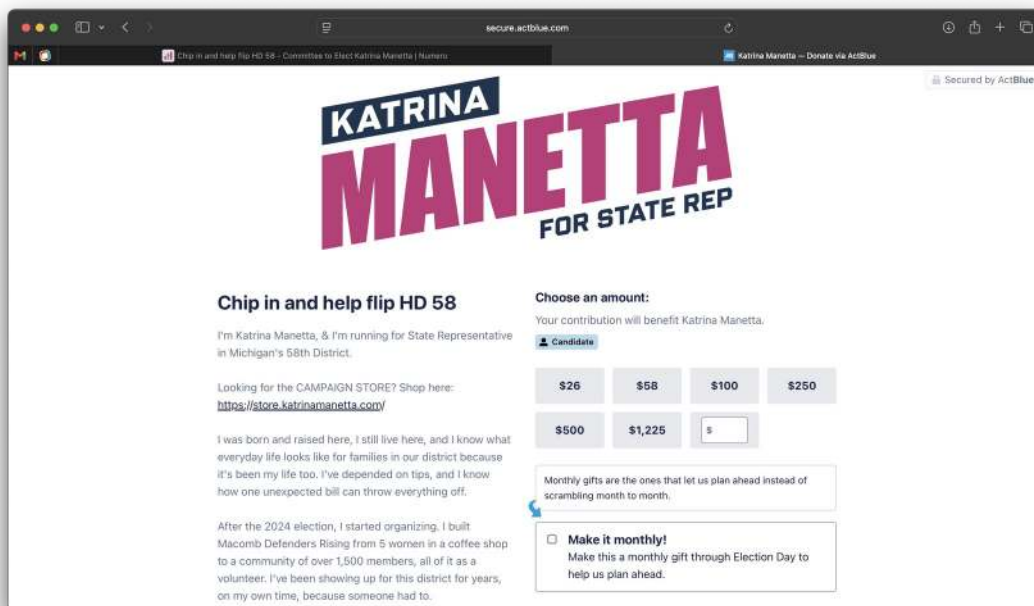
Printed Name: Vance Patrick

Date: August 31st, 2026

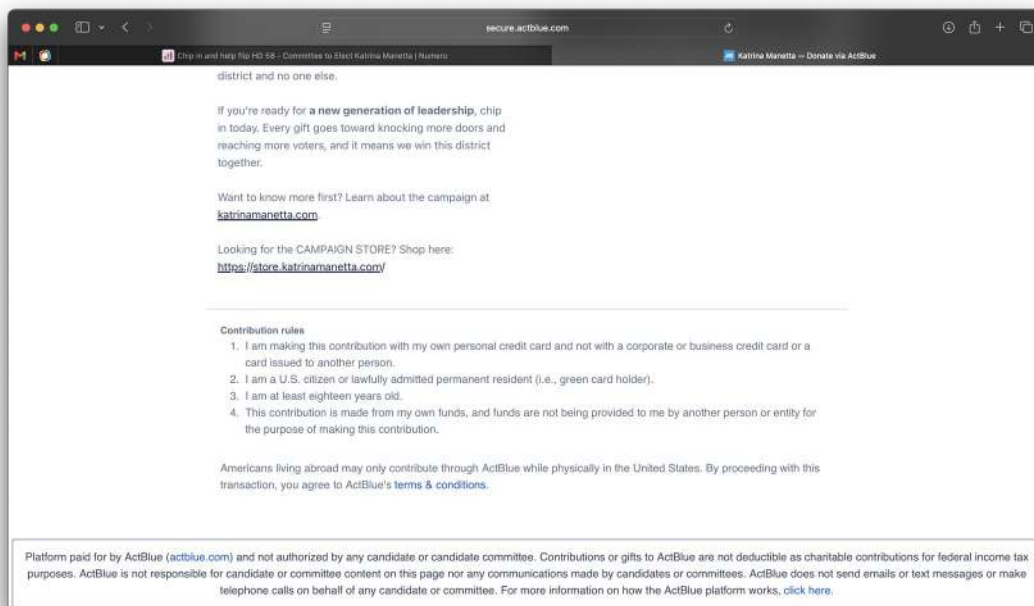
Enclosures: Exhibit A (ActBlue donation page screenshots); Exhibit B (Numero donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Katrina Manetta, captured on or about August 31, 2026



Upper portion of ActBlue donation page, showing "KATRINA MANETTA FOR STATE REP" logo and "Chip in and help flip HD 58" solicitation



Lower portion of ActBlue donation page — only ActBlue's generic platform notice appears; no committee-specific disclaimer

EXHIBIT B

Screenshots of the secure.numero.ai donation page for Katrina Manetta, captured on or about August 31, 2026

The screenshot shows the top half of a web browser window. The address bar displays 'secure.numero.ai'. The page features a campaign logo for 'KATRINA MANETTA FOR STATE REP' in blue and red. Below the logo, the heading 'Chip in and help flip HD 58' is followed by a short bio of Katrina Manetta. A link to the campaign store is provided. To the right, a 'Choose an amount' section offers preset donation amounts (\$26, \$58, \$100, \$250, \$500, \$1,225, and an 'OTHER' option) and a checkbox for 'Make it monthly!'. Below these are buttons for 'Pay with Card', 'Apple Pay', and 'Google Pay'.

Upper portion of Numero donation page, showing campaign logo and identical "Chip in and help flip HD 58" solicitation text

The screenshot shows the bottom half of the web browser window. It includes a link to learn more about the campaign at 'katrinamanetta.com'. Below this is the same campaign store link. A section titled 'Contribution rules' lists four conditions for donors. At the bottom, a bordered box contains the text: 'Paid for by Committee to Elect Katrina Manetta' and 'Contributions or gifts to Committee to Elect Katrina Manetta are not tax deductible.'

Lower portion of Numero donation page, showing the bordered "Paid for by Committee to Elect Katrina Manetta" statement, which names the committee but includes no address

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Jasper Ryan Martus — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Jasper Ryan Martus

Committee: Committee to Elect Jasper Martus

Office Sought: State Representative, District 69

Campaign/Donation Page(s) Reviewed: jaspermartus.com;
<https://secure.actblue.com/donate/committee-to-elect-jasper-martus-2> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the website located at jaspermartus.com for Jasper Ryan Martus, a candidate for State Representative in District 69. The site displays a campaign logo combining the candidate's name with an office identifier — "JASPER MARTUS" in large blue and red type over a Michigan silhouette graphic, with the banner "MI STATE REPRESENTATIVE" beneath it. A red utility bar above the main navigation includes direct calls to action reading "Volunteer" and "Yard Sign," and the main navigation bar includes a prominent red "DONATE" button alongside menu items "Meet Jasper," "Accomplishments," "Priorities," "In the News," and "Endorsements." This same logo, navigation menu, and "DONATE" call to action repeat further down the page.

In the page footer, Complainant's designee located a bordered box containing the text, in capital letters: "PAID FOR BY THE COMMITTEE TO ELECT JASPER MARTUS." That box contains the committee name only — no address. Set apart from that box, below it and without a border, in smaller gray type, the page separately displays the text "P.O. BOX 165 Flushing, MI 48433" followed by the email address "jasper@jaspermartus.com." Because the address is displayed outside the disclosure box and in visibly different formatting from the "Paid for by" statement — rather than as part of one unified block combining the committee name and address — the disclosure does not function as the single, self-contained statement MCL 169.247(1) requires, even though both the committee name and an address do appear somewhere on the page.

B. ActBlue Donation Page (Exhibit B)

Complainant's designee also accessed the linked donation page at secure.actblue.com, titled "Jasper Martus — Donate via ActBlue," which displays the heading "Donate to Committee to Elect Jasper Martus" and the text "Your contribution will benefit Jasper Martus," followed by a "Choose an amount" module with preset donation buttons (\$25, \$100, \$250, \$1,000) and a monthly-giving option, expressly soliciting campaign contributions.

Complainant's designee reviewed this donation page in its entirety and found no committee-specific "Paid for by [Committee], [Address]" statement anywhere on it. The only disclaimer-type text present is ActBlue's standard platform-wide notice at the bottom of the page: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. ... ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees." This generic boilerplate is ActBlue's own disclosure and does not identify any address for the Committee to Elect Jasper Martus.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (campaign website screenshot); Exhibit B (ActBlue donation page screenshots)

EXHIBIT A

Screenshot of the jaspermartus.com campaign website, captured on or about August 31, 2026



Homepage and footer, showing the campaign logo, "DONATE" calls to action, and the "PAID FOR BY THE COMMITTEE TO ELECT JASPER MARTUS" box set apart from the separately-formatted address below it

EXHIBIT B

Screenshots of the secure.actblue.com donation page for Jasper Ryan Martus, captured on or about August 31, 2026

The screenshot shows the upper portion of a web browser window displaying the secure.actblue.com donation page. The browser's address bar shows 'secure.actblue.com' and the page title is 'Jasper Martus - Donate via ActBlue'. The page has a dark header with a home icon and the text 'Home - Martus For State Rep'. The main content area is white and features the heading 'Donate to Committee to Elect Jasper Martus' on the left. On the right, there is a 'Choose an amount:' section with a subtext 'Your contribution will benefit Jasper Martus.' and a 'Candidate' label. Below this are four buttons for donation amounts: '\$25', '\$100', '\$250', and '\$1,000'. A text input field with a dollar sign is also present. Below the amount selection is a 'Make it monthly!' section with two buttons: 'Yes, count me in!' and 'No, donate once' (which is selected with a checkmark). Further down is a 'Checkout' section with a link 'Have an ActBlue Express account? Sign in to give faster.' and three payment options: 'Pay with card', 'Apple Pay', and 'Donate with Google Pay'. At the bottom, there is a 'Contribution rules' section with a single rule: '1. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person.'

Upper portion of donation page, showing "Donate to Committee to Elect Jasper Martus" heading

The screenshot shows the lower portion of the same web browser window. The 'Checkout' section is visible, including the link 'Have an ActBlue Express account? Sign in to give faster.' and the three payment options: 'Pay with card', 'Apple Pay', and 'Donate with Google Pay'. Below this is the 'Contribution rules' section, which lists four rules: '1. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person.', '2. I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder).', '3. I am at least eighteen years old.', and '4. This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution.' Below the rules is a paragraph stating: 'Americans living abroad may only contribute through ActBlue while physically in the United States. By proceeding with this transaction, you agree to ActBlue's terms & conditions.' At the very bottom, there is a small disclaimer: 'Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, click here.'

Lower portion of donation page — only ActBlue's generic platform notice appears; no committee address

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Joseph McClusky — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Joseph McClusky

Committee: Not identified by name in the material reviewed

Office Sought: State Representative, District 86

Campaign/Donation Page(s) Reviewed: mccluskyformi.com; <https://secure.actblue.com/donate/joseph-mcclusky-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. ActBlue Donation Page (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the donation page located at secure.actblue.com, titled "Joseph McClusky for State Representative" (browser tab) and "Joseph McClusky — Donate via ActBlue." The page displays a large campaign logo reading "McCLUSKY" over a banner reading "for STATE REPRESENTATIVE," alongside a photograph of the candidate. The page heading states, "Donate today to support Joseph McClusky for State Representative!" followed by candidate-authored text: "I'm running for State Representative because I believe a better kind of politics is possible. It's time we cut through the noise and nonsense that has come to dominate our system and get back to what really matters: improving the quality of life for all of our neighbors," and further stating, "The work so far has sent a clear message that this campaign is serious, but we have to keep that momentum going. And I am asking for your support." The page also contains the express solicitation, "Will you join the campaign as a Founding Donor and help flip this district from red to blue?" A "Choose an amount" module follows, with preset donation buttons (\$10, \$25, \$50, \$100, \$250, \$500, \$1,225) and monthly-giving option.

Complainant's designee reviewed the page in its entirety, including the footer, and found no "Paid for by [Committee], [Address]" disclosure of any kind. The only disclaimer-type text present is ActBlue's standard, platform-wide notice at the bottom of the page: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, [click here](#)." This is ActBlue's own generic disclosure and does not identify any committee name or address for the McClusky campaign.

5. Requested Relief

- Investigate the facts alleged in this complaint;

- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

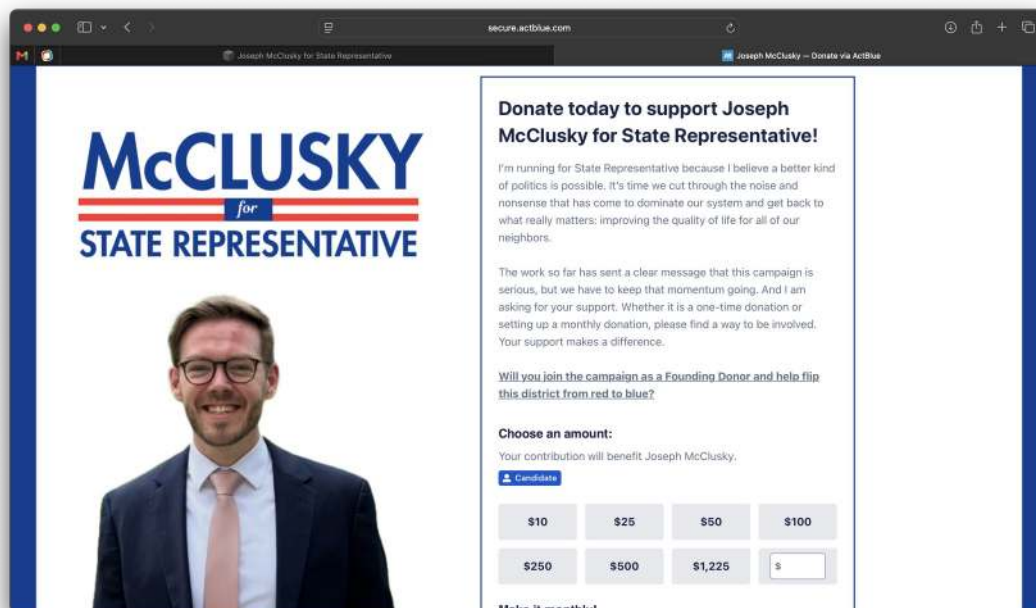
Printed Name: Vance Patrick

Date: August 31st, 2026

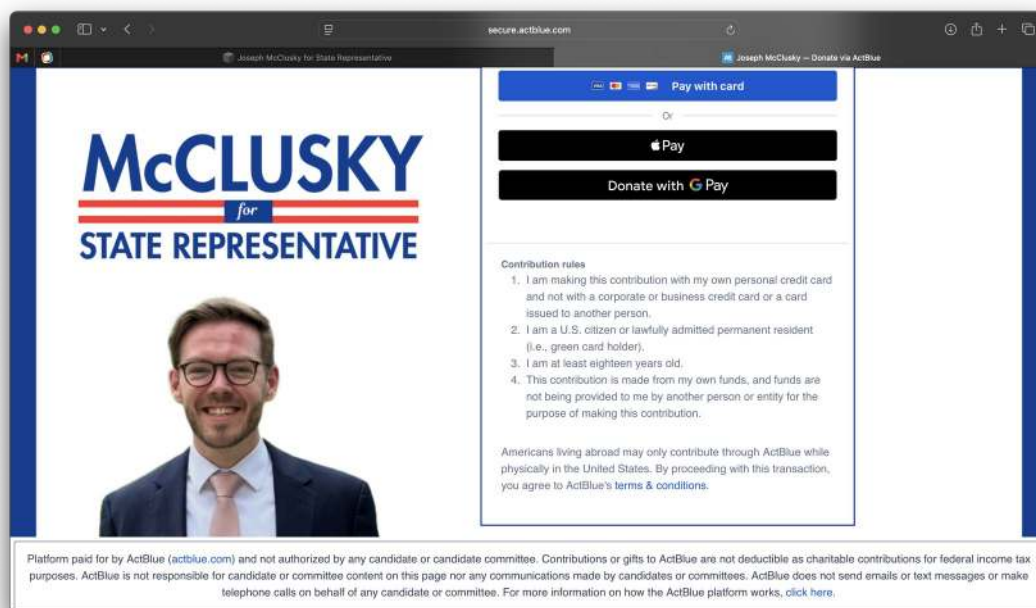
Enclosures: Exhibit A (ActBlue donation page screenshots)

EXHIBIT A

Screenshots of the *secure.actblue.com* donation page for Joseph McClusky, captured on or about August 31, 2026



Upper portion of donation page, showing "McCLUSKY for STATE REPRESENTATIVE" logo and express solicitation text



Lower portion of donation page — only ActBlue's generic platform notice appears; no committee-specific disclaimer

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Stacey McDuffie — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Stacey McDuffie

Committee: Not identified by name in the material reviewed

Office Sought: State Representative, District 51

Campaign/Donation Page(s) Reviewed: staceymcduffie.com

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Friday, August 28, 2026, Complainant's designee accessed the website located at staceymcduffie.com for Stacey McDuffie, a candidate for Michigan State Representative, District 51. The site consists of a single full-viewport landing section displaying the candidate's name, campaign tagline, a photograph, and “Donate” and “Volunteer” buttons. The page contains no footer of any kind beneath this section — no navigation links, no copyright notice, and no “Paid for by” statement or other funding-source identification of any kind, naming no person or committee and no address.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

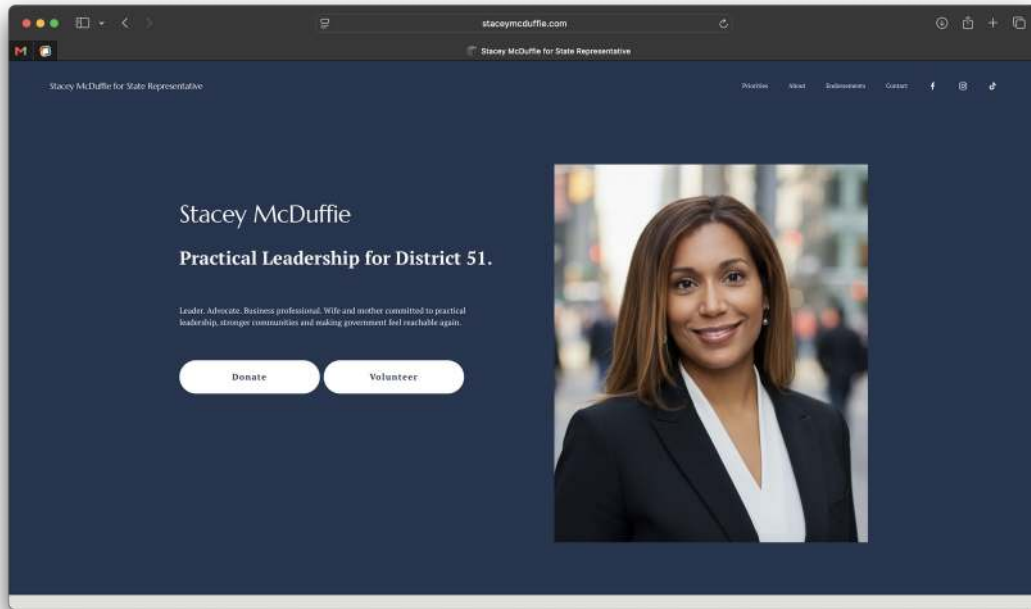
I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

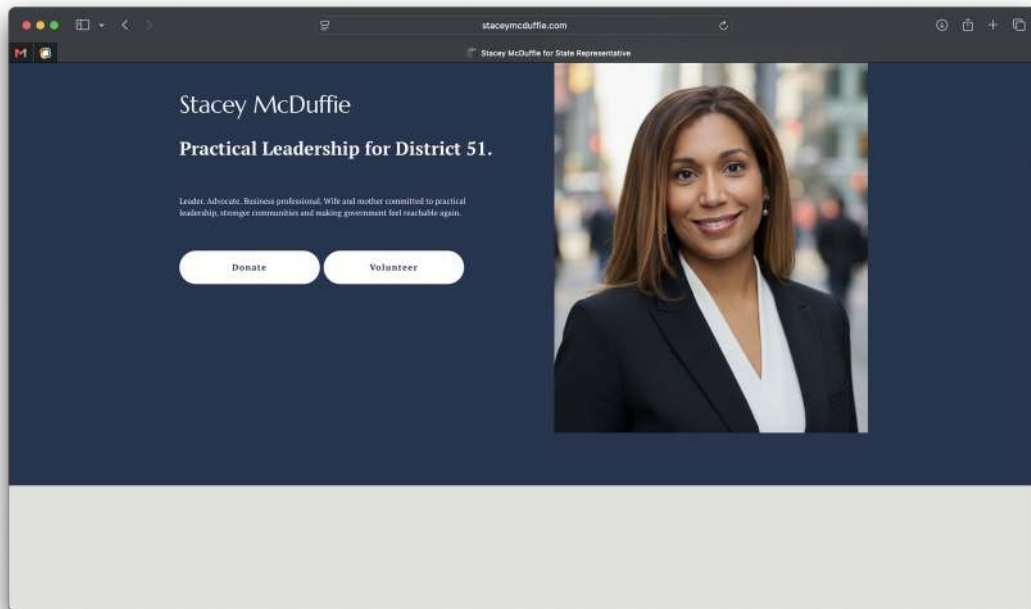
Enclosures: Exhibit A (full-page website screenshots)

EXHIBIT A

Full-page screenshots of staceymcduffie.com showing the entire page, captured on or about August 28, 2026



Full page as loaded — no footer or disclaimer of any kind



Full page, alternate view — confirms the page ends with no footer or disclaimer

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Lisa McIntyre — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Lisa McIntyre

Committee: Friends of Lisa McIntyre for Michigan

Office Sought: State Representative, District 22

Campaign/Donation Page(s) Reviewed: mcintyreformichigan.com; secure.numero.ai (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed a donation page hosted at secure.numero.ai, linked from the campaign website mcintyreformmichigan.com, soliciting contributions for Lisa McIntyre, a candidate for State Representative in District 22. The page displays a campaign email header, a photograph of the candidate, and a set of donation-amount buttons. At the bottom of the page, a boxed disclosure states “Paid for by Friends of Lisa McIntyre for Michigan,” followed by a notice that contributions are not tax deductible. No mailing address for the committee appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

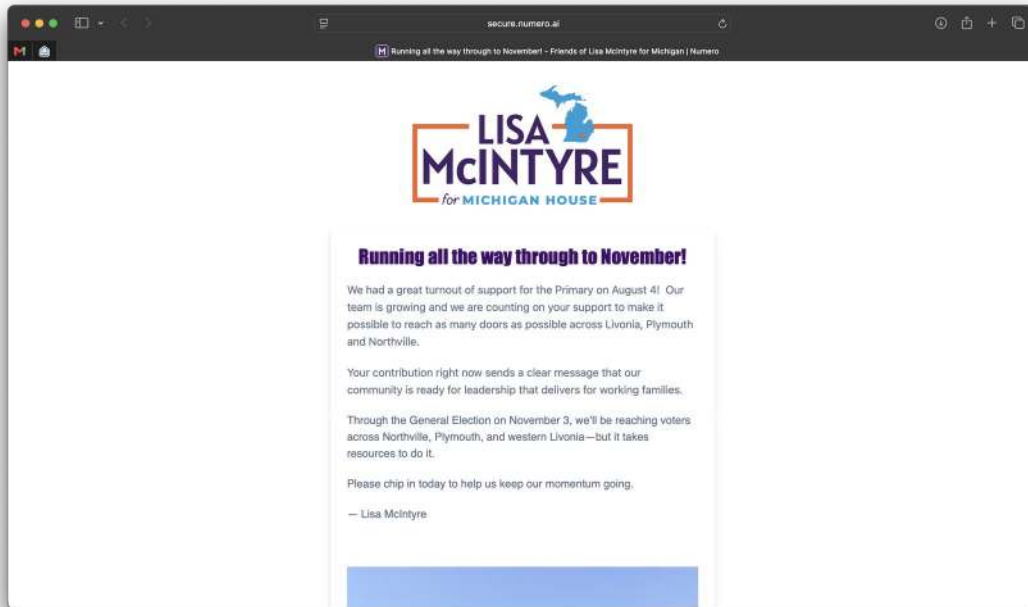
I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

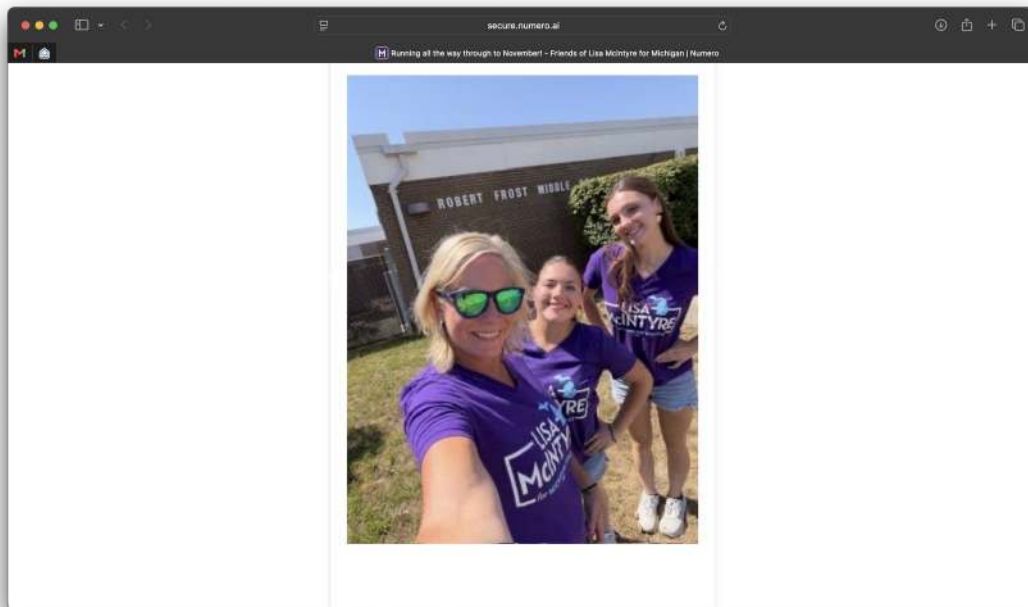
Enclosures: Exhibit A (donation page screenshots)

EXHIBIT A

Screenshots of the secure.numero.ai donation page for Lisa McIntyre, captured on or about August 29, 2026



Top of donation page — campaign email header and headline



Campaign photograph appearing above the donation form

secure.numero.ai

Running all the way through to November! - Friends of Lisa McIntyre for Michigan | Numero

Choose an amount:

Your secure contribution will benefit Lisa McIntyre for Michigan. To contribute as an organization, click [here](#).

Want to help boost our reach across Northville, Plymouth and western Livonia? Please consider a recurring contribution through November 3, 2026.

☐ **Make it monthly!**
Recurring contributions help us create budgets, hire staff, and plan ahead

Or

Contribution rules

1. I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder).

Donation amount selection and payment options

secure.numero.ai

Running all the way through to November! - Friends of Lisa McIntyre for Michigan | Numero

Or

Contribution rules

1. I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder).
2. I am at least eighteen years old.
3. This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution.
4. I am making this contribution with my own personal credit or debit card and not with a corporate or business credit card or a card issued to another person.

Paid for by Friends of Lisa McIntyre for Michigan
Contributions or gifts to Friends of Lisa McIntyre for Michigan are not tax deductible.

Bottom of donation page — committee named but no address given

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Amy Mindell — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Amy Mindell

Committee: Not identified by name in the material reviewed

Office Sought: “WB Trustee” (as stated on the page reviewed; the abbreviation is not expanded and the office is not further identified in the material reviewed)

Campaign/Donation Page(s) Reviewed: secure.actblue.com (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Friday, August 28, 2026, Complainant's designee accessed a donation page hosted at secure.actblue.com for Amy Mindell, described on the page as a candidate "for WB Trustee." The page displays a fundraising progress bar and donation amount options. This identification of Amy Mindell as a candidate "for WB Trustee," paired with the fundraising progress bar and donation amount options soliciting contributions, constitutes express advocacy for her election under *Golden v. Yahkind*, bringing the page within MCL 169.247's disclosure requirement. Its only funding-source disclosure is a footer notice stating that the platform itself is "paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee." No statement identifying a campaign committee for the candidate, by name or address, appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

Enclosures: Exhibit A (donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Amy Mindell, captured on or about August 28, 2026

This screenshot shows the top half of a donation page. On the left, a campaign header for 'Amy Mindell for WB Trustee' displays '\$7,396 Raised' and a progress bar towards a '\$15,000 GOAL'. Below this is a 'Donate to Amy Mindell' button and a 'Help Amy's campaign' link. The main section is titled 'Choose an amount:' and includes a note that the contribution will benefit Amy Mindell. It features a 'Candidate' label, a grid of preset donation amounts (\$10, \$50, \$118, \$250, \$500), and a custom amount input field. A 'Make it monthly!' section offers options to 'Yes, count me in!' or 'No, donate once' (which is selected). The 'Checkout' section asks if the user has an ActBlue Express account and provides a link to sign in. Three payment buttons are shown: 'Pay with card', 'Apple Pay', and 'Donate with Google Pay'. At the bottom, 'Contribution rules' are listed, starting with the requirement to use a personal credit card.

Amy Mindell for WB Trustee

\$7,396 Raised **GOAL \$15,000**

Donate to Amy Mindell updated at 12:09 PM

Help Amy's campaign

Choose an amount:
Your contribution will benefit Amy Mindell.

Candidate

\$10 **\$50** **\$118** **\$250**

\$500

Make it monthly!

Yes, count me in! **✓ No, donate once**

Checkout

Have an ActBlue Express account? [Sign in to give faster.](#)

Pay with card

Or

Apple Pay

Donate with Google Pay

Contribution rules

1. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person.

Upper portion of donation page

This screenshot shows the bottom half of the donation page. It continues the 'Checkout' section with the same 'Pay with card', 'Apple Pay', and 'Donate with Google Pay' buttons. Below the payment options, the 'Contribution rules' are fully listed, including requirements for U.S. citizenship, age, and funding source. A notice states that Americans living abroad must contribute while physically in the United States. At the very bottom, a disclaimer clarifies that the platform is paid for by ActBlue and is not authorized by any candidate, and that contributions are not deductible for federal income tax purposes.

Checkout

Have an ActBlue Express account? [Sign in to give faster.](#)

Pay with card

Or

Apple Pay

Donate with Google Pay

Contribution rules

1. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person.
2. I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder).
3. I am at least eighteen years old.
4. This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution.

Americans living abroad may only contribute through ActBlue while physically in the United States. By proceeding with this transaction, you agree to ActBlue's [terms & conditions](#).

Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, [click here](#).

Lower portion of donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Cynthia R. Neeley — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Cynthia R. Neeley

Committee: The Committee to Elect Cynthia Neeley

Office Sought: State Representative, District 70

Campaign/Donation Page(s) Reviewed: cynthianeeley.com;
<https://secure.actblue.com/donate/committee-to-elect-cynthia-neeley-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee’s address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the website located at cynthianeeley.com for Cynthia R. Neeley, a candidate for State Representative in District 70. The browser tab for the page is titled "Re-Elect Cynthia Neeley – for the 70th District." The page displays a stylized "Cynthia NEELEY" logo, a top-navigation "DONATE" link, and a prominent blue "CONTRIBUTE" button in the header — an express call to action soliciting financial support. Body text states: "Representative Cynthia Neeley is currently serving in the Michigan House of Representatives for the NEW 70th district."

In the page footer, Complainant's designee located the text "The Committee to Elect Cynthia Neeley ©2026. All Rights Reserved." This is formatted and worded as a copyright/attribution credit line, not as a "Paid for by" disclosure statement, and it does not use the statutory "Paid for by" language. More importantly, no address of any kind accompanies this text or appears anywhere else on the page; the only contact information shown on the page is a phone number, "(810) 458-3936," and an email address, "cynthia@cynthianeeley.com," under a "Phone"/"E-Mail" contact block that is visually separate from the committee-name footer line and does not itself reference the committee. No unified "Paid for by [Committee], [Address]" statement appears anywhere on the page reviewed.

B. ActBlue Donation Page (Exhibit B)

Complainant's designee also accessed the linked donation page at secure.actblue.com, titled "Cynthia Neeley — Donate via ActBlue." The page displays the heading "State Representative Cynthia Neeley Knows Flint Has Potential, But She Needs Your Help Proving It To The World!" followed by the text: "State Representative Cynthia Neeley has been fighting for Flint Residents day in and day out. She is up for re-election and needs your help to continue her community engagement and constituent services programs. There is no such thing as a donation too small and every dollar helps. Can Cynthia count on a contribution from you?" A "Choose an amount" contribution module follows.

Complainant's designee reviewed this donation page in its entirety and found no committee-specific "Paid for by [Committee], [Address]" statement anywhere on it. The only disclaimer-type text present is ActBlue's standard platform-wide notice at the bottom of the page: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. ... ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees." This generic boilerplate is ActBlue's own disclosure and does not identify any address for the Committee to Elect Cynthia Neeley.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

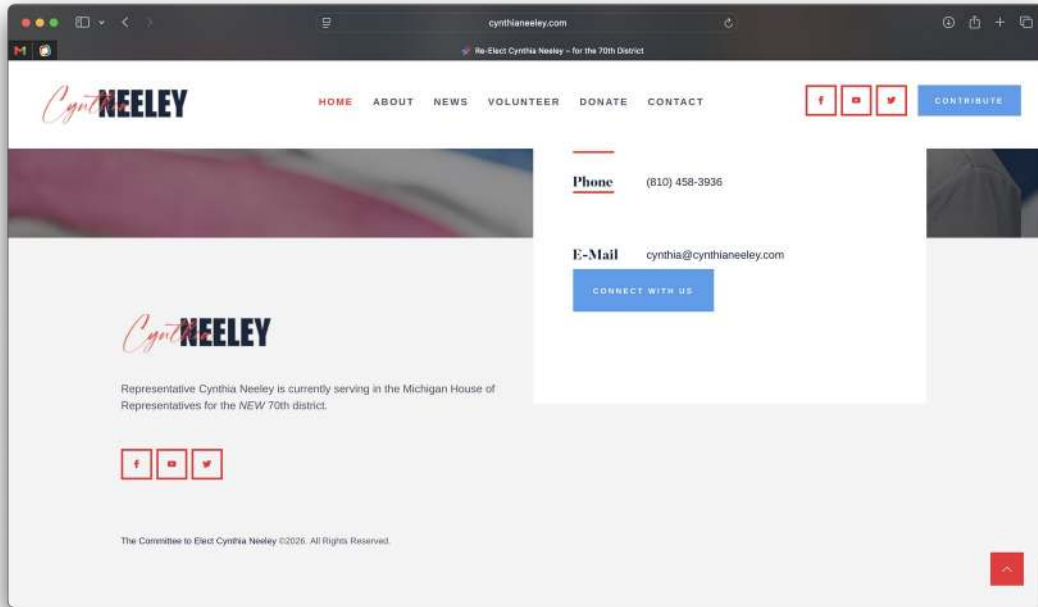
Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (campaign website screenshot); Exhibit B (ActBlue donation page screenshots)

EXHIBIT A

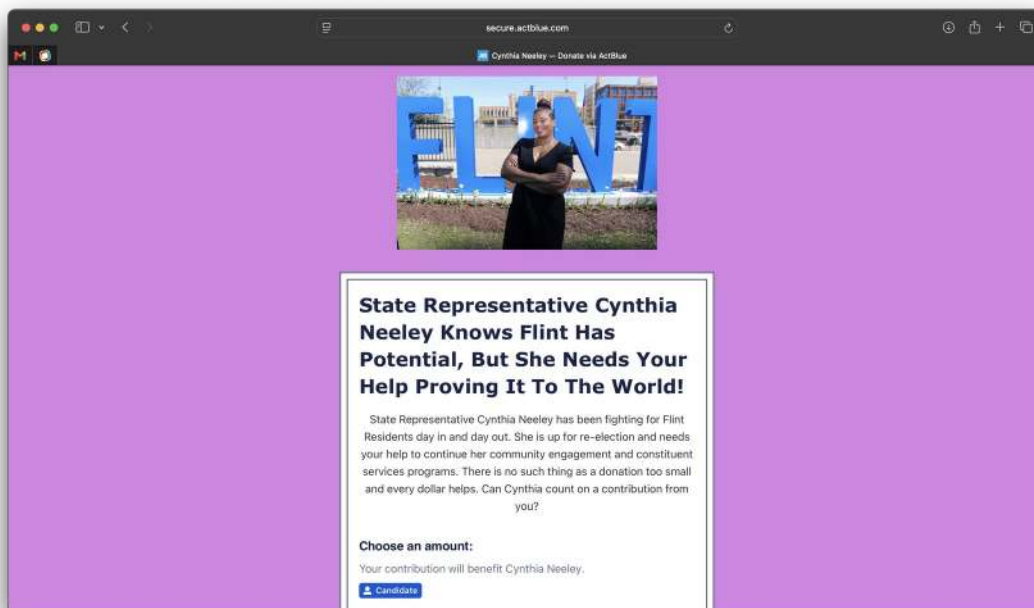
Screenshot of the cynthianeeley.com campaign website, captured on or about August 31, 2026



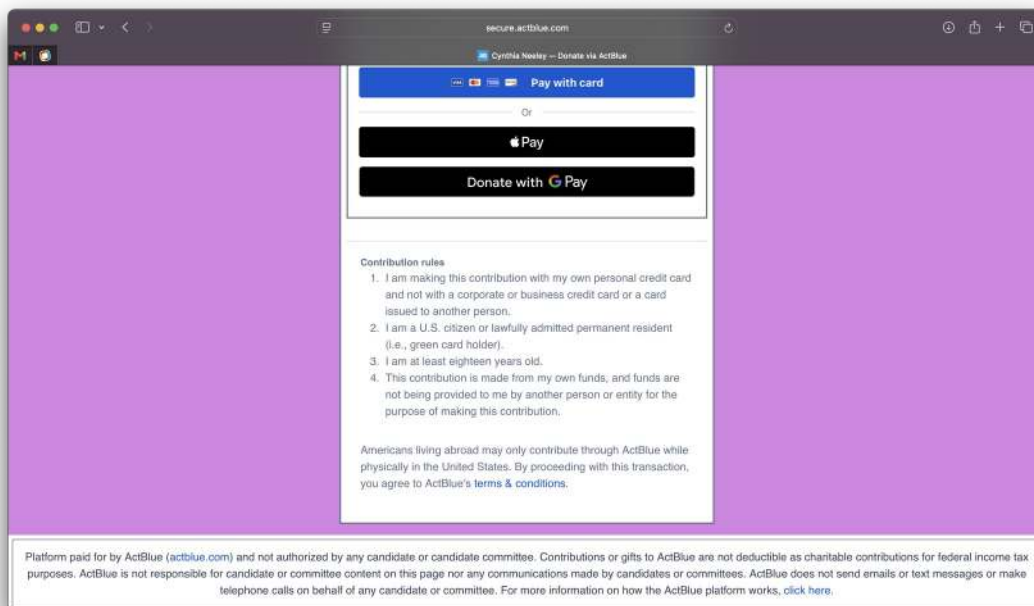
Homepage and footer, showing the "CONTRIBUTE" call to action and the "The Committee to Elect Cynthia Neeley ©2026" footer credit line, with no accompanying address

EXHIBIT B

Screenshots of the secure.actblue.com donation page for Cynthia R. Neeley, captured on or about August 31, 2026



Upper portion of donation page, showing express-advocacy solicitation text soliciting re-election support



Lower portion of donation page — only ActBlue's generic platform notice appears; no committee-specific disclaimer

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against David Okonewski — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: David Okonewski

Committee: Committee to elect David Okonewski

Office Sought: Springfield Township Trustee

Campaign/Donation Page(s) Reviewed: davidforspringfield.com; secure.actblue.com (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Friday, August 28, 2026, Complainant's designee accessed the website located at davidforspringfield.com for David Okonewski, a candidate for Springfield Township Trustee. The footer of the page states “Paid for by Committee to elect David Okonewski,” followed by a notice regarding the site's cookie policy. No mailing address for the committee appears anywhere on the page. This footer language expressly identifying the site as that of the “Committee to elect David Okonewski” constitutes express advocacy for his election under *Golden v. Yahkind*, bringing the page within MCL 169.247's disclosure requirement.

B. Linked Donation Page (Exhibit B)

Complainant's designee also accessed a linked donation page hosted at secure.actblue.com soliciting contributions to David Okonewski. Its only funding-source disclosure is a footer notice stating that the platform itself is “paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” No statement identifying a campaign committee for the candidate, by name or address, appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

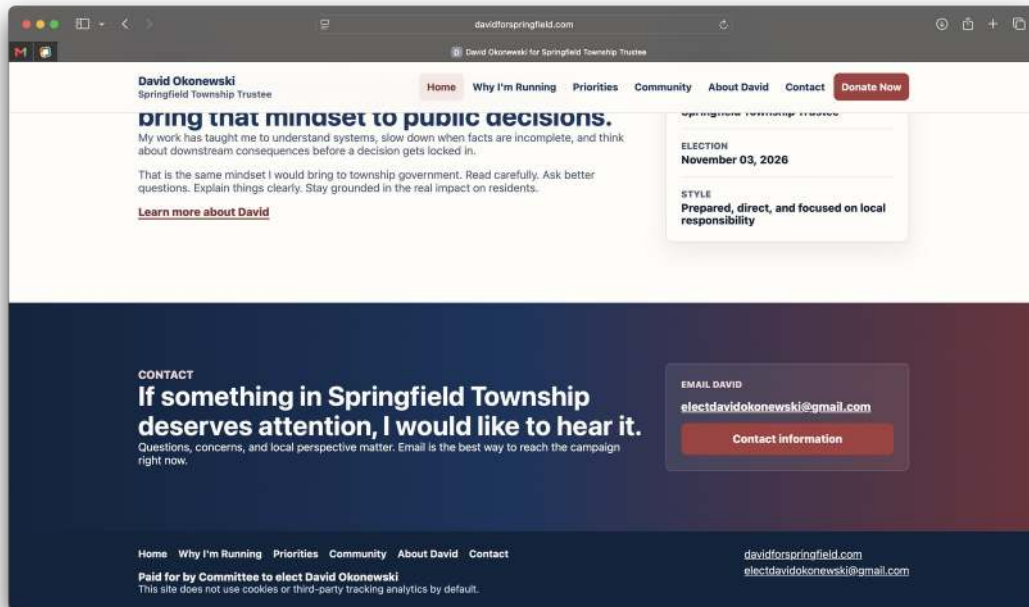
Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (website screenshot); Exhibit B (donation page screenshots)

EXHIBIT A

Screenshot of the davidforspringfield.com footer, captured on or about August 28, 2026



Website footer — committee named but no address given

EXHIBIT B

Screenshots of the secure.actblue.com donation page for David Okonewski, captured on or about August 28, 2026

The screenshot shows the top half of a web browser window displaying the ActBlue donation page for David Okonewski. The browser's address bar shows 'secure.actblue.com' and the page title is 'David Okonewski — Donate via ActBlue'. A security badge in the top right corner indicates 'Secured by ActBlue'. The page features the 'David Okonewski TOWNSHIP TRUSTEE' logo with the tagline 'For Residents ★ For Township'. Below the logo, the heading 'Donate to David Okonewski!' is followed by the text: 'Pitch in today to support David Okonewski for Township Trustee. Together, we can move our community forward.' To the right, under the heading 'Choose an amount:', it says 'Your contribution will benefit David Okonewski.' and includes a 'Candidate' label. There are buttons for '\$5', '\$10', '\$20', '\$25', '\$50', and '\$100', along with a custom amount input field. Below this, the 'Make it monthly!' section explains that sustaining support helps with budgeting and offers two options: 'Yes, count me in!' and 'No, donate once' (which is selected). At the bottom of this section is a 'Checkout' link with the text 'Have an ActBlue Express account? Sign in to give faster.'

Upper portion of donation page

The screenshot shows the bottom half of the same web browser window. The 'Checkout' section is visible, with a link: 'Have an ActBlue Express account? Sign in to give faster.' Below this are three payment options: 'Pay with card', 'Apple Pay', and 'Donate with Google Pay'. Further down, the 'Contribution rules' section lists four conditions: 1. Contribution must be made with a personal credit card, not a corporate or business card. 2. Contributor must be a U.S. citizen or lawfully admitted permanent resident. 3. Contributor must be at least 18 years old. 4. Contribution must be made from the contributor's own funds. A note states that Americans living abroad may only contribute while physically in the United States and that proceeding with the transaction implies agreement to ActBlue's terms and conditions. At the very bottom, a small disclaimer states: 'Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, click here.'

Lower portion of donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Jennifer Oldham — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Jennifer Oldham

Committee: Not identified by name in the material reviewed

Office Sought: Ann Arbor Public Schools Board of Education, Board Member

Campaign/Donation Page(s) Reviewed: oldhamforaaps.com;
<https://secure.actblue.com/donate/oldhamforaaps> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed the website located at oldhamforaaps.com for Jennifer Oldham, a candidate for the Public Schools of the City of Ann Arbor Board of Education. The footer of the page lists general contact information: “oldhamforaaps@gmail.com | PO Box 130221 Ann Arbor, MI 48113 | 734-249-9952.” While a mailing address (a post office box) appears in this line, it is presented solely as general contact information; no “Paid for by” statement or any other language identifying a campaign committee appears anywhere on the page.

B. Linked Donation Page (Exhibit B)

Complainant's designee also accessed a linked donation page hosted at <https://secure.actblue.com/donate/oldhamforaaps> soliciting contributions to Jennifer Oldham. This donation page's own URL slug, “oldhamforaaps” — combining the candidate's surname with “for AAPS” — together with the page's direct solicitation of contributions to Jennifer Oldham, constitutes express advocacy for her election under *Golden v. Yahkind* and brings the page within MCL 169.247's disclosure requirement. Its only funding-source disclosure is a footer notice stating that the platform itself is “paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” No statement identifying a campaign committee for the candidate, by name or address, appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

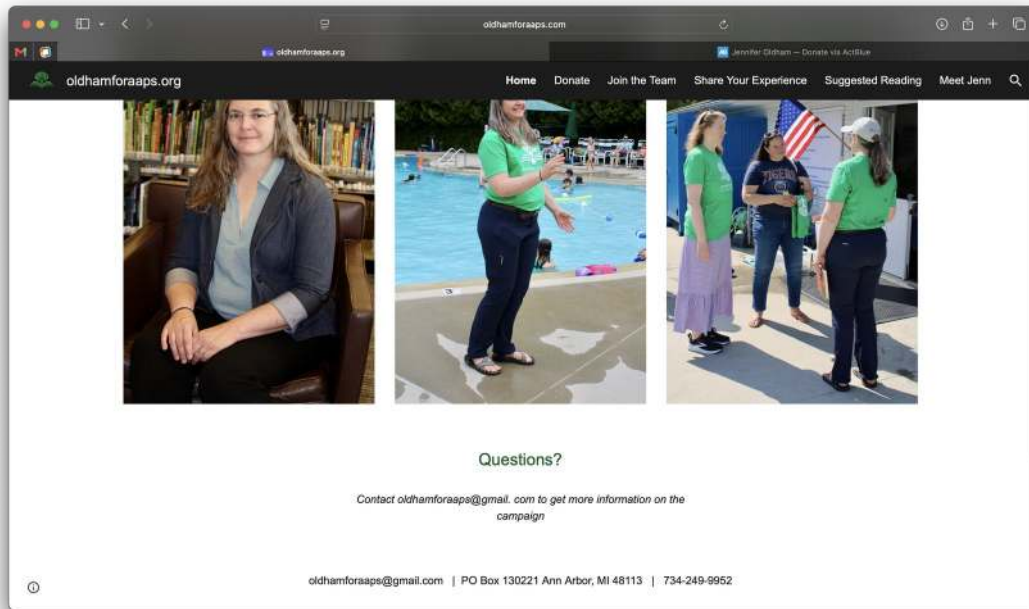
Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (website screenshot); Exhibit B (donation page screenshot)

EXHIBIT A

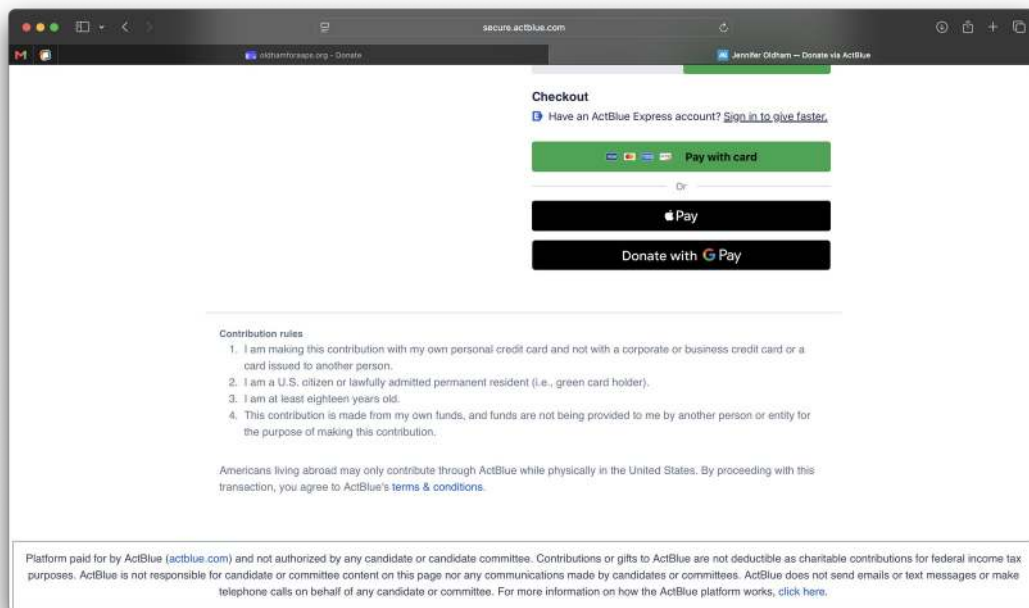
Screenshot of the oldhamforaaps.com footer, captured on or about August 29, 2026



Website footer — a PO box appears as general contact information, but no “Paid for by” statement naming a committee

EXHIBIT B

Screenshot of the secure.actblue.com donation page for Jennifer Oldham, captured on or about August 29, 2026



Donation page footer — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Craig Olzak — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrikmi@gmail.com

2. Respondent Information

Candidate: Craig Olzak

Committee: Not identified by name in the material reviewed

Office Sought: Plymouth-Canton Community Schools Board of Education, Board Member

Campaign/Donation Page(s) Reviewed: craig4pccs.org; <https://secure.actblue.com/donate/craig-olzak-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed a donation page hosted at <https://secure.actblue.com/donate/craig-olzak-1> soliciting contributions for Craig Olzak, a candidate for Board of Education Trustee for Plymouth-Canton Community Schools. The page states “Pitch in today to support Craig Olzak for Board of Education Trustee. Together, we can move our community forward,” but contains no “Paid for by” statement identifying a campaign committee anywhere in its body. Its only funding-source disclosure is a footer notice stating that the platform itself is “Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” No committee name or mailing address for Craig Olzak appears anywhere on the page. This statement, “Pitch in today to support Craig Olzak for Board of Education Trustee,” is a direct call to action soliciting financial support for his candidacy, constituting express advocacy for his election under *Golden v. Yahkind* and bringing the page within MCL 169.247's disclosure requirement.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

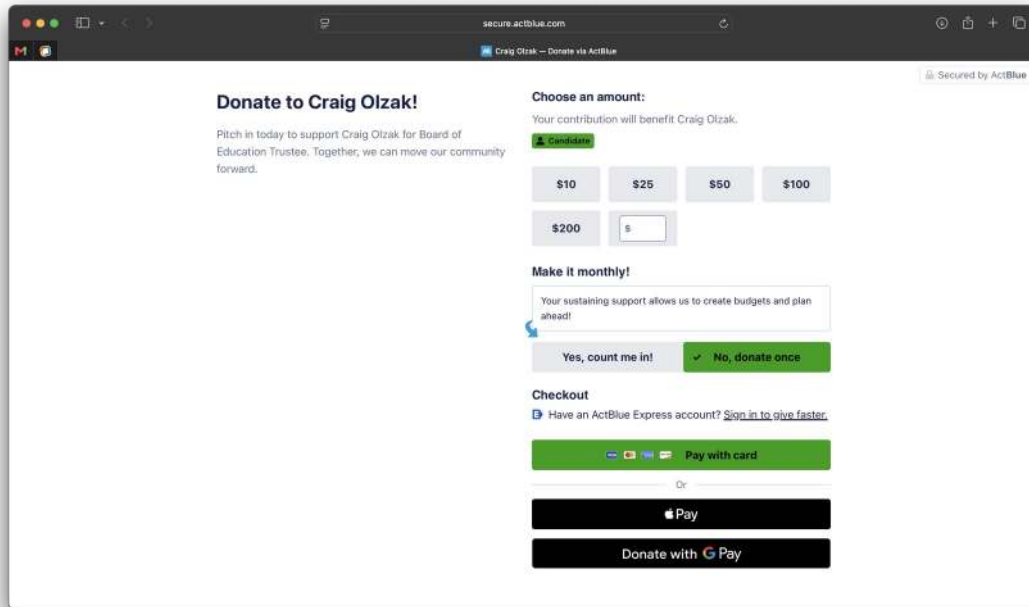
Signature: /s/ Vance Patrick

Printed Name: Vance Patrick
Date: August 31st, 2026

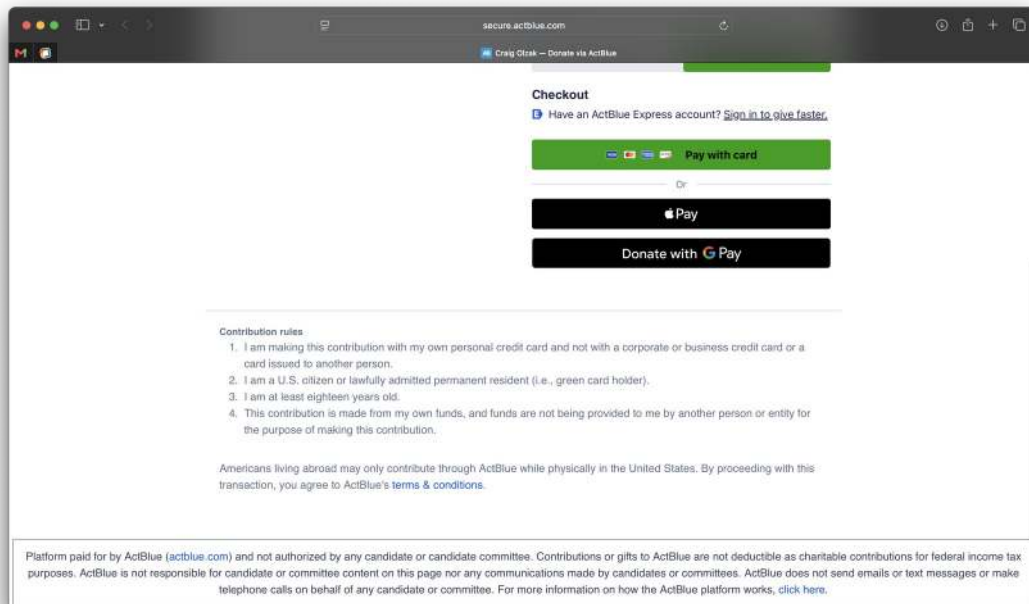
Enclosures: Exhibit A (donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Craig Olzak, captured on or about August 29, 2026



Top of donation page — no committee name or address given



Bottom of donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Justin Onwenu — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrikmi@gmail.com

2. Respondent Information

Candidate: Justin Onwenu

Committee: Justin Onwenu for Michigan

Office Sought: State Senate, District 1

Campaign/Donation Page(s) Reviewed: justinformi.com; <https://secure.actblue.com/donate/justino> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed the website located at justinformi.com for Justin Onwenu, a candidate for State Senate in District 1. The footer of the page states “Paid for by Justin Onwenu for Michigan.” No mailing address for the committee appears anywhere on the page; the only other contact information in that same footer is an email address, “justin@justinformi.com.” The website's own domain, justinformi.com, combines the candidate's first name with “for MI” campaign branding, which constitutes express advocacy for Justin Onwenu's election under *Golden v. Yahkind* and brings the page within MCL 169.247's disclosure requirement.

B. Linked Donation Page (Exhibit B)

Complainant's designee also accessed a linked donation page hosted at <https://secure.actblue.com/donate/justino> soliciting contributions to Justin Onwenu. Its only funding-source disclosure is a footer notice stating that the platform itself is “paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” No statement identifying a campaign committee for the candidate, by name or address, appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

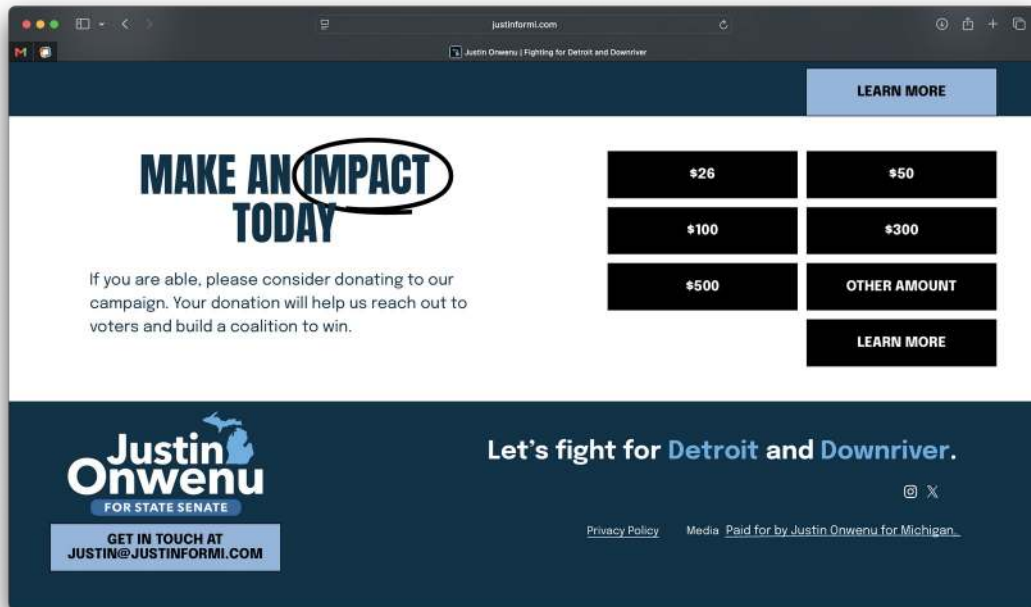
Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (website screenshot); Exhibit B (donation page screenshots)

EXHIBIT A

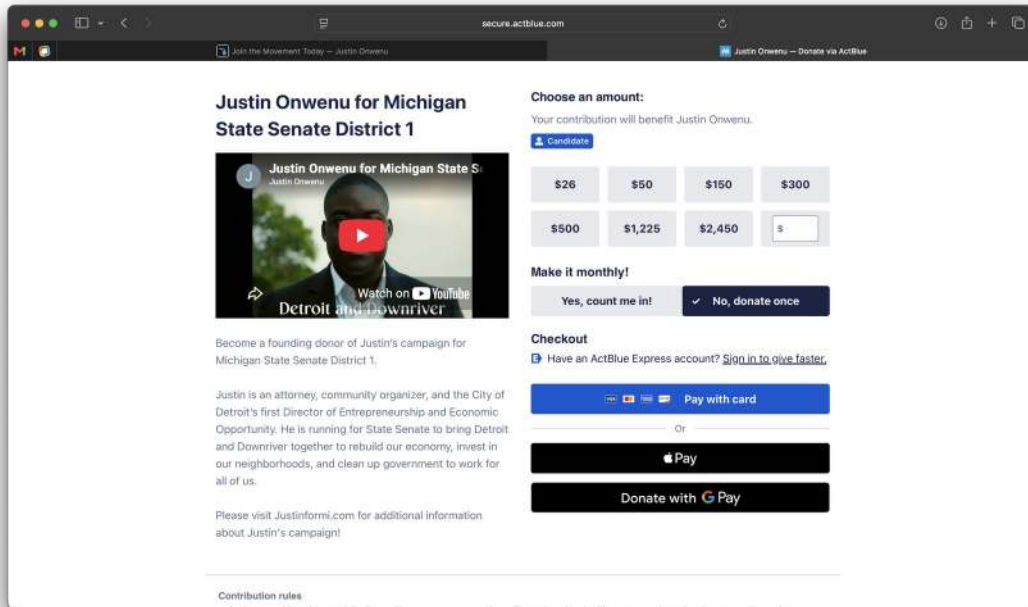
Screenshot of the justinformi.com footer, captured on or about August 29, 2026



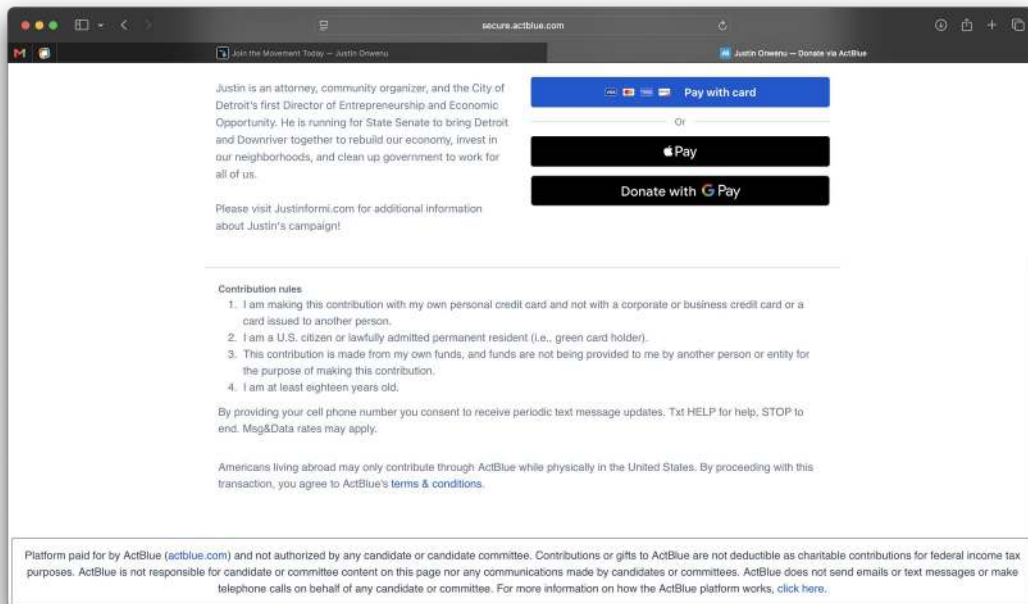
Website footer — committee named ("Paid for by Justin Onwenu for Michigan") but no address given

EXHIBIT B

Screenshots of the secure.actblue.com donation page for Justin Onwenu, captured on or about August 29, 2026



Upper portion of donation page



Lower portion of donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Veronica Paiz — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrikmi@gmail.com

2. Respondent Information

Candidate: Veronica Paiz

Committee: Committee to Elect Veronica Paiz

Office Sought: State Representative, District 10

Campaign/Donation Page(s) Reviewed: veronicaforstaterep.com;
<https://secure.actblue.com/donate/vp10> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed a donation page hosted at <https://secure.actblue.com/donate/vp10> soliciting contributions for Veronica Paiz, a candidate for State Representative in District 10. The body of the page includes a paragraph thanking donors that states, “If you prefer to contribute by check or money order, please make it payable to Committee to Elect Veronica Paiz, and mail to 20052 Hunt Club Dr., Harper Woods, MI 48225.” This is a check-mailing instruction, not a “Paid for by” disclosure statement, and it is the only place on the page where the committee's name and a mailing address appear together. Separately, the page's footer carries only ActBlue's generic platform notice, stating that the platform itself is “Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” No unified “Paid for by [Committee], [address]” statement identifying the committee appears anywhere on the page. This direct solicitation of contributions for Paiz's candidacy for State Representative is a call to action for financial support of her election and constitutes express advocacy within the meaning of *Golden v. Yahkind*, bringing the page within MCL 169.247's disclosure requirement.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (donation page screenshots)

EXHIBIT A

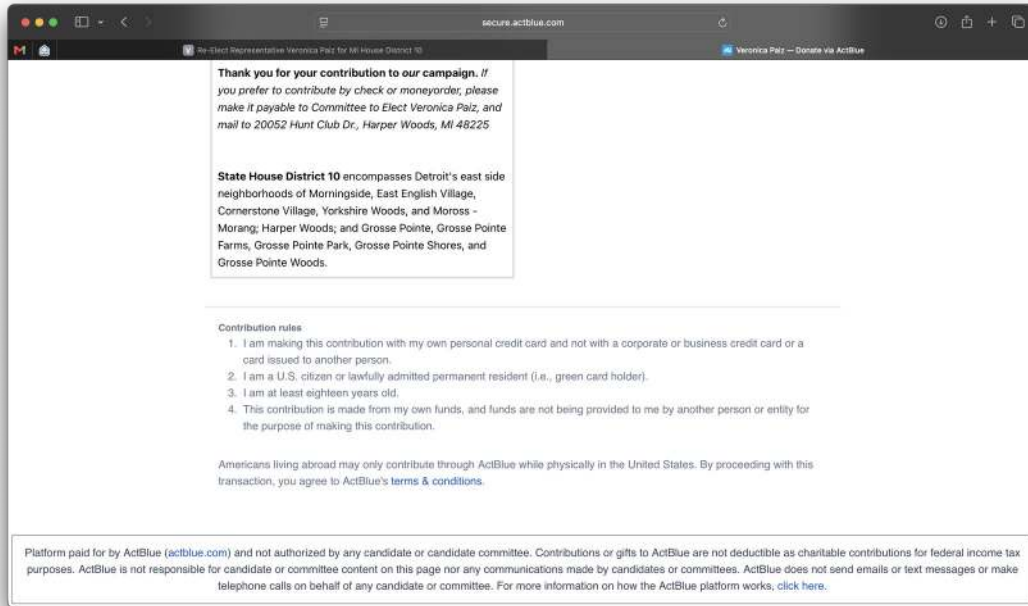
Screenshots of the secure.actblue.com donation page for Veronica Paiz, captured on or about August 29, 2026

The screenshot shows the top portion of a donation page for Veronica Paiz, MI State Representative District 10. On the left, there is a header with her name and district, followed by a thank-you message and a portrait photo. Below the photo is a line of text starting with "Since first taking the oath of office, I have worked with". On the right side, there is a "Choose an amount:" section with a grid of buttons for \$25, \$50, \$100, \$150, \$250, \$500, \$1,225, and a custom amount field. Below this is a "Make it monthly!" section with a checkbox for recurring donations and a dropdown for the number of months (set to 12). Further down is a "Checkout" section with a link to sign in for an ActBlue Express account and three payment buttons: "Pay with card", "Apple Pay", and "Donate with Google Pay".

Top of donation page

This screenshot shows the body text of the donation page. It contains several paragraphs of text: "My legislation includes bills to lower auto insurance for seniors, libraries and your 'Right to Read', tenants' rights, education, water quality, and civil rights for all Michigan residents."; "I'm a member of the Detroit Caucus, and others including Progressive Women's, Labor, Legislative Disability, and Firearm Safety & Gun Violence Prevention."; "Let's fight to flip the House Democrat in 2026 and put an end to the legislative contempt and disrespect of House Republicans."; "Thank you for your contribution to our campaign. If you prefer to contribute by check or moneyorder, please make it payable to Committee to Elect Veronica Paiz, and mail to 20052 Hunt Club Dr., Harper Woods, MI 48225"; and "State House District 10 encompasses Detroit's east side neighborhoods of Morningside, East English Village, Cornerstone Village, Yorkshire Woods, and Moross - Morang; Harper Woods; and Grosse Pointe, Grosse Pointe Farms, Grosse Pointe Park, Grosse Pointe Shores, and Grosse Pointe Woods." At the bottom, there is a "Contribution rules" section with a list starting with "1. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a...".

Body text — committee name and address appear only in check-mailing instructions, not as a “Paid for by” statement



Bottom of donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Melissa Perron — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpattickmi@gmail.com

2. Respondent Information

Candidate: Melissa Perron

Committee: Not identified by name in the material reviewed

Office Sought: State Representative, District 107

Campaign/Donation Page(s) Reviewed: perronformichigan.com;
<https://secure.actblue.com/donate/melissaperron107> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. ActBlue Donation Page (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the ActBlue donation page located at <https://secure.actblue.com/donate/melissaperron107>, which is used to solicit contributions for Melissa Perron, a candidate for State Representative, Michigan's 107th District. The page's browser tab is titled "Melissa Perron — Donate via ActBlue."

The page displays an express-advocacy campaign graphic combining the candidate's name and office: a navy banner reading "Melissa PERRON," a graphic of a bridge, and the text "107th District — Bridging Michigan." Below the graphic, the page states in a headline, "Melissa Perron for State Representative - MI 107th District," followed by campaign messaging: "Northern Michigan families deserve leadership that understands rising costs and workforce shortages," "Melissa Perron is running to bring practical, people-first leadership to Lansing," "Your donation will help fund yard signs, door hangers, and voter outreach throughout the 107th District," and a direct call to action, "Chip in today and be part of the movement." The donation module states "Choose an amount: Your contribution will benefit Melissa Perron" beside a "Candidate" tag and dollar-amount buttons (\$10 through \$250) and payment buttons ("Pay with card," Apple Pay, Google Pay).

No "Paid for by [Committee], [Address]" statement, nor any committee name or address of any kind, appears anywhere on the two screenshots reviewed. The only disclosure present on the page is ActBlue's own standard platform notice, set off in a bordered box at the very bottom of the page, reading: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, click here." This is ActBlue's own generic disclaimer describing its role as a platform; it does not identify a committee or address for Melissa Perron and does not satisfy MCL 169.247(1).

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

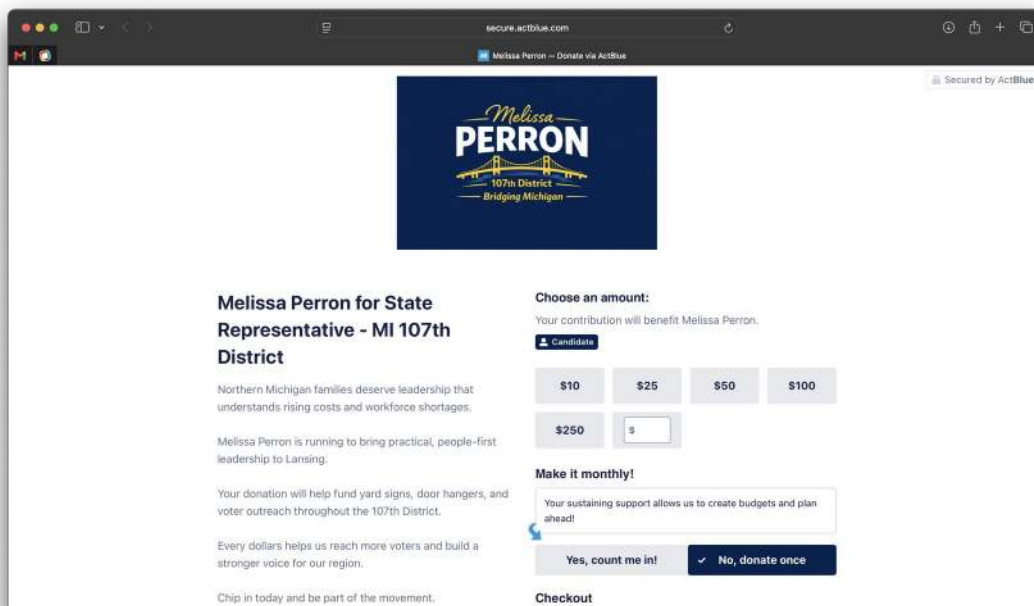
Printed Name: Vance Patrick

Date: August 31st, 2026

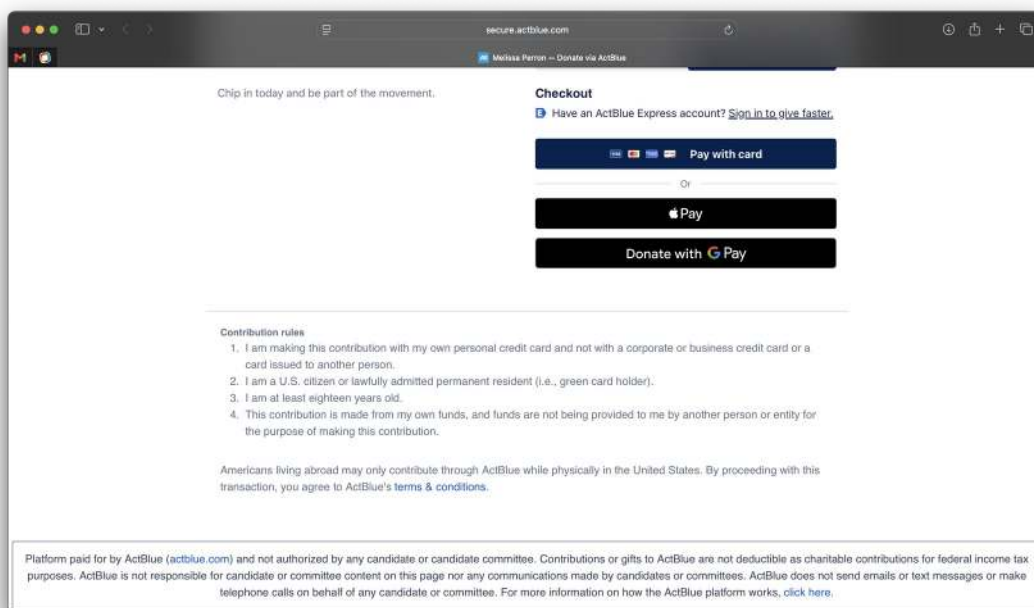
Enclosures: Exhibit A (ActBlue donation page screenshots)

EXHIBIT A

Screenshots of the *secure.actblue.com* donation page for Melissa Perron, captured on or about August 31, 2026



Upper portion of donation page — campaign banner graphic and express-advocacy messaging; no committee disclaimer visible



Lower portion of donation page — only ActBlue's generic platform notice appears; no committee-specific disclaimer

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Tonya Myers Phillips — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Tonya Myers Phillips

Committee: Friend to Elect Tonya Myers Phillips

Office Sought: State Representative, District 7

Campaign/Donation Page(s) Reviewed: tonyamyersphillips.com

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed the website located at tonyamyersphillips.com for Tonya Myers Phillips, a candidate for State Representative in District 7. The footer of the page states “Paid for by Friend to Elect Tonya Myers Phillips. Copyright © 2026 Tonya Myers Phillips. All rights reserved.” No mailing address for the committee appears anywhere on the page; a phone number and email address appear in a separate column of the same footer as general contact information, not as part of the funding disclosure.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

Enclosures: Exhibit A (website screenshot)

EXHIBIT A

Screenshot of the tonyamyersphillips.com footer, captured on or about August 29, 2026

The screenshot shows a web browser window with the URL tonyamyersphillips.com. The page features a yellow background with a pattern of white stars. The main heading is "SUBSCRIBE TO OUR NEWSLETTER." followed by the text "Sign up with your email address to receive news and updates." Below this is a form with three input fields: "First Name", "Last Name", and "Email Address", and a "Sign Up" button. A link "We respect your privacy" is located below the form. The footer is dark blue and contains the following information:

- Phone number: 313.528.9514
- Email address: repmyersphillips@gmail.com
- Links: [Meet Tonya](#), [Issues](#), [Connect](#)
- Buttons: [Donate](#)
- Social media icons: Instagram, Facebook, Twitter, LinkedIn
- Small text: "Paid for by Friend to Elect Tonya Myers Phillips. Copyright © 2026 Tonya Myers Phillips. All rights reserved."
- Small text: "Site crafted by [Smith Anderson Group](#)"

Website footer — committee named but no address given

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Dayna Polehanki — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Dayna Polehanki

Committee: Dayna Polehanki for State Senate

Office Sought: State Senate

Campaign/Donation Page(s) Reviewed: daynaforsenate.com

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Friday, August 28, 2026, Complainant's designee accessed the website located at daynaforsenate.com for Dayna Polehanki, a candidate for Michigan State Senate. The bottom of the page displays a standalone identification statement reading “PAID FOR BY DAYNA POLEHANKI FOR STATE SENATE,” followed only by the text “Powered by Tech for Campaigns.” This statement does not itself include any address. A mailing address (“PO Box 51843, Livonia, MI 48151”) does appear elsewhere on the page, but only as part of a separate “Contact Us” block offering an email address and donate button for site visitors — not as part of, or adjacent to, the “Paid for by” identification statement itself. The required identification, as it appears on the page, therefore supplies the committee name without a corresponding address.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

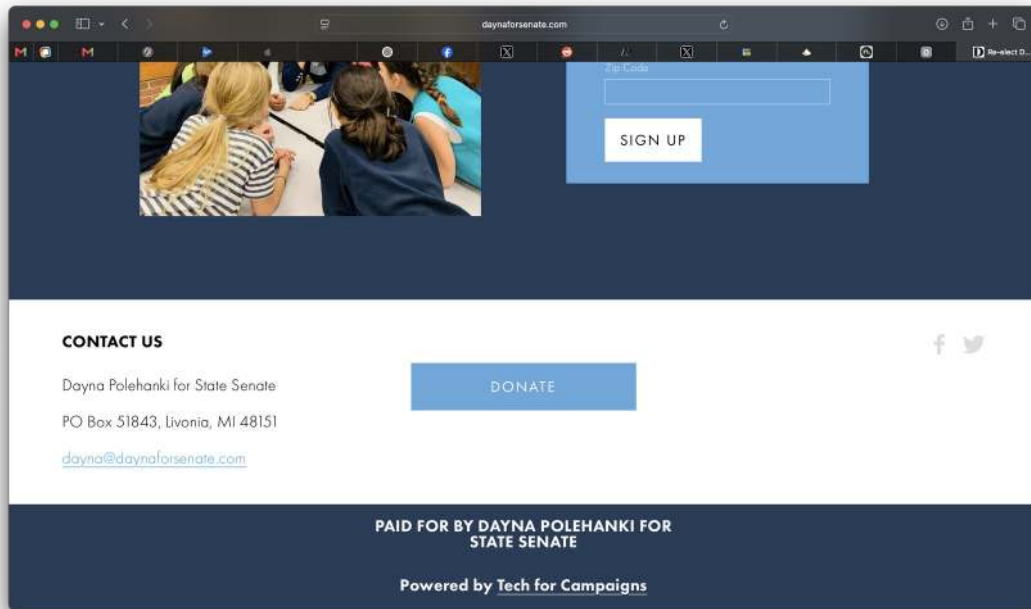
I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

Enclosures: Exhibit A (website footer screenshot)

EXHIBIT A

Screenshot of the daynaforsenate.com footer, captured on or about August 28, 2026



Website footer — “Paid for by” statement (bottom bar) is separate from the mailing address (Contact Us block, above)

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Bret Pollington — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Bret Pollington

Committee: Not identified by name in the material reviewed

Office Sought: Saline City Council Member

Campaign/Donation Page(s) Reviewed: bretforsaline.com

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed the website located at bretforsaline.com for Bret Pollington, a candidate for Saline City Council. The footer of the page displays the campaign name, an email address (“bret@bretforsaline.com”), a Facebook icon, a website-design credit (“Made in Saline by Jess”), and the line “© 2025 Bret Pollington for Saline City Council.” This copyright-style notice is the only statement on the page that names the candidate in connection with the site; it does not use “Paid for by” or similar identifying language, and no mailing address — street address or PO box — appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

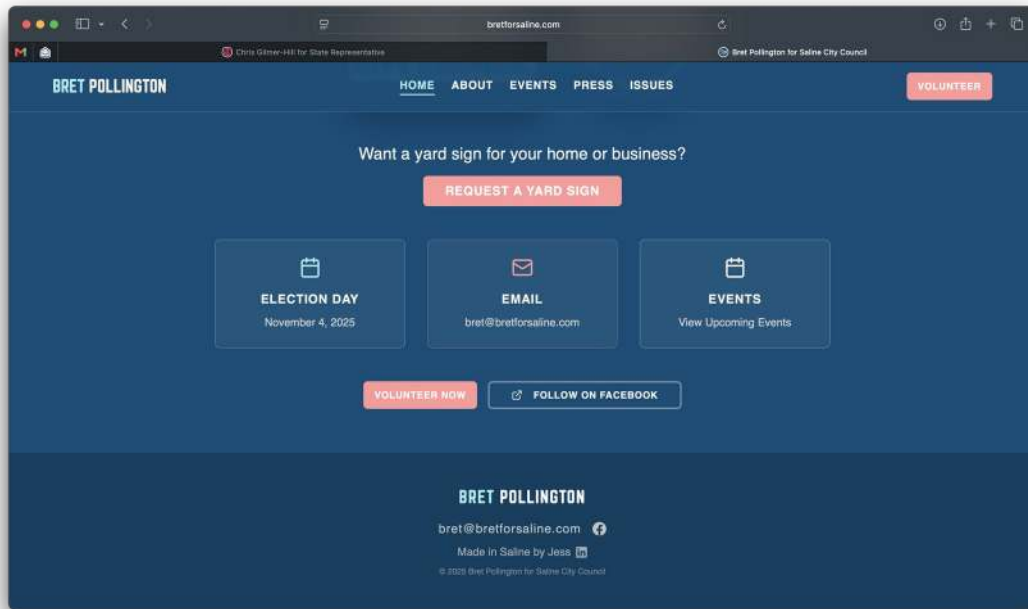
I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

Enclosures: Exhibit A (website screenshot)

EXHIBIT A

Screenshot of the bretforsaline.com footer, captured on or about August 29, 2026



Website footer — copyright line only, no “Paid for by” statement and no address

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Harold A. Pope — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrikmi@gmail.com

2. Respondent Information

Candidate: Harold A. Pope

Committee: Committee to Elect Harold A. Pope

Office Sought: State Representative, District 74

Campaign/Donation Page(s) Reviewed: votepope74.com; <https://secure.actblue.com/donate/harold-a-pope> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee’s address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the website located at vote pope74.com for Harold A. Pope, a candidate for State Representative, Michigan's 74th District. The site's browser tab is titled "Vote Pope 74." The header displays an express-advocacy logo graphic combining the candidate's name and office: "HAROLD A. POPE — DEMOCRAT — for State Representative, Michigan's 74th District," with the navigation bar including a red "Donate Here!" button as a direct call to action. The body copy solicits volunteer support and describes goals of "showing up, and staying engaged" and invites visitors to "Please feel free to request yard signs here!"

The page footer repeats the same campaign logo graphic and, in a white-bordered box set apart from surrounding text, states only: "PAID FOR BY COMMITTEE TO ELECT HAROLD A. POPE." No address appears inside that bordered disclaimer box or immediately adjacent to it.

An address does appear elsewhere on the page, but as a separate and differently-labeled block: under the heading "Donate By Mail," in a different column of the footer with no border, the site states: "Harold A. Pope for Michigan House District 74 / PO Box 203 / Holt, MI 48842." This "Donate By Mail" block uses yet a third name formulation ("Harold A. Pope for Michigan House District 74") that differs from both the committee name given in the bordered "Paid for by" statement ("Committee to Elect Harold A. Pope") and is not joined with any "paid for by" language. The committee name and the mailing address therefore do not appear together as a single, self-contained disclosure block: the "Paid for by" statement lacks an address, and the address that does appear on the page is set apart by different formatting, a different heading ("Donate By Mail" rather than the disclaimer box), a different location in the footer, and even a differently worded organization name.

B. ActBlue Donation Page (Exhibit B)

Complainant's designee also accessed, on or about Monday, August 31, 2026, the linked ActBlue donation page at <https://secure.actblue.com/donate/harold-a-pope>, browser tab titled "Harold Pope — Donate via ActBlue." The page displays an express-advocacy banner graphic reading "HAROLD A.

POPE" over a ribbon stating "FOR STATE REPRESENTATIVE 74TH HOUSE DISTRICT — DEMOCRAT." The page headline states, "Donate to Harold A Pope!" followed by first-person campaign messaging: "I'm running for the Michigan House of Representatives in the 74th District, and I need your support... Your support will help me continue this important work in the House of Representatives." The donation module states "Choose an amount: Your contribution will benefit Harold Pope" beside a "Candidate" tag.

No committee name or address of any kind appears anywhere on the ActBlue donation page itself. The only disclosure present is ActBlue's own standard platform notice at the bottom of the page: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee..." This is ActBlue's own generic boilerplate describing its role as the payment platform; it is not a disclosure by or on behalf of the Committee to Elect Harold A. Pope and does not satisfy MCL 169.247(1).

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

Enclosures: Exhibit A (campaign website screenshot); Exhibit B (ActBlue donation page screenshots)

EXHIBIT A

Screenshot of the votepope74.com campaign website, captured on or about August 31, 2026



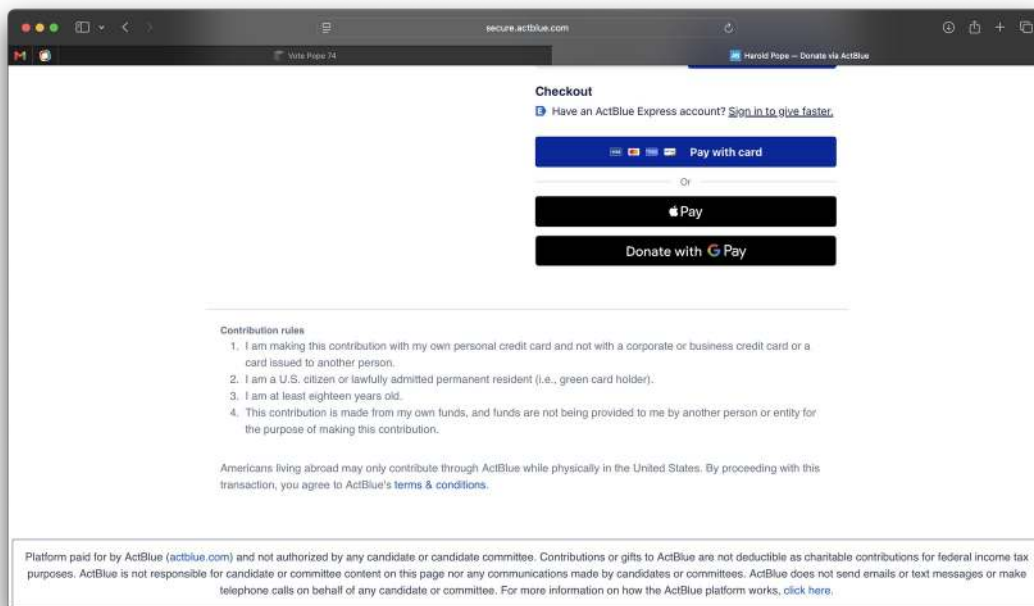
Campaign website footer — bordered "PAID FOR BY COMMITTEE TO ELECT HAROLD A. POPE" statement (no address) set apart from a separately-headed "Donate By Mail" address block

EXHIBIT B

Screenshots of the secure.actblue.com donation page for Harold A. Pope, captured on or about August 31, 2026



Upper portion of donation page — campaign banner graphic and express-advocacy messaging



Lower portion of donation page — only ActBlue's generic platform notice appears; no committee-specific disclaimer

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Sarah Pounds — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Sarah Pounds

Committee: Not identified by name in the material reviewed

Office Sought: State Representative, District 54 (Michigan's 54th House District)

Campaign/Donation Page(s) Reviewed: <https://secure.actblue.com/donate/sarah-pounds-1> (donation page); electsarahpounds.com (referenced in page text)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Friday, August 28, 2026, Complainant's designee accessed a donation page hosted at <https://secure.actblue.com/donate/sarah-pounds-1> for Sarah Pounds, identified as a candidate for Michigan's 54th House District. The page displays candidate branding and biographical text. This candidate branding, presented together with the page's solicitation of contributions to Sarah Pounds's campaign, constitutes express advocacy for her election under *Golden v. Yahkind*, bringing the page within MCL 169.247's disclosure requirement. Its only funding-source disclosure is a footer notice stating that the platform itself is "paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee." No statement identifying a campaign committee for the candidate, by name or address, appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

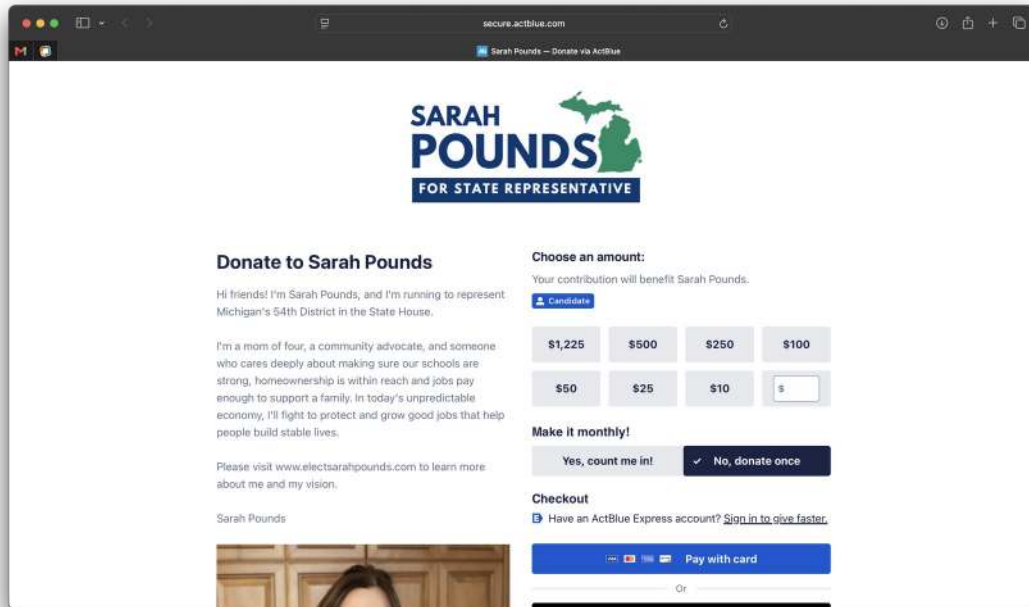
I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

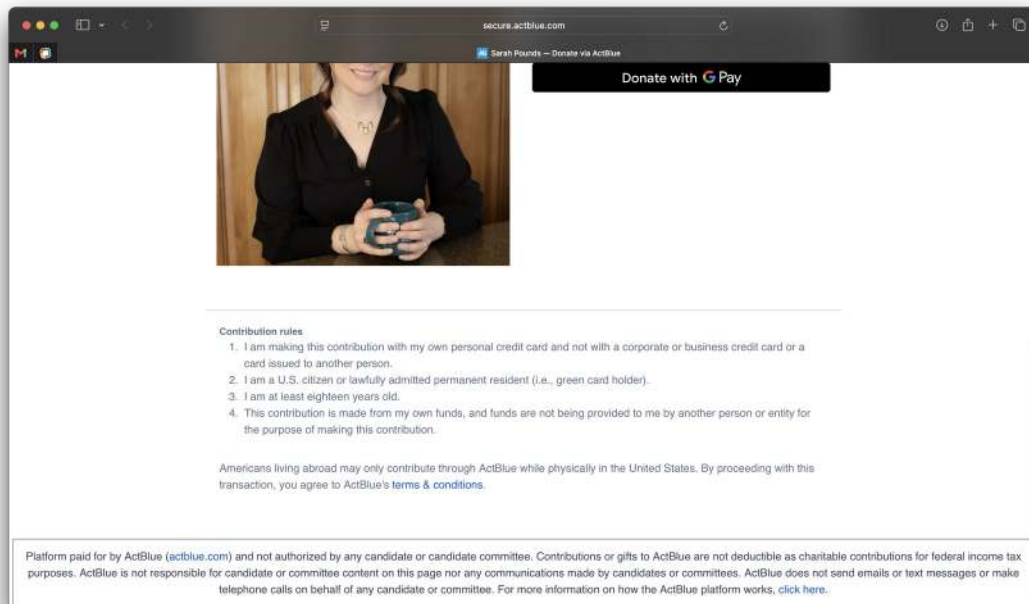
Enclosures: Exhibit A (donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Sarah Pounds, captured on or about August 28, 2026



Upper portion of donation page



Lower portion of donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Aaron J. Puno — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrikmi@gmail.com

2. Respondent Information

Candidate: Aaron J. Puno

Committee: Aaron J. Puno for Ann Arbor School Board

Office Sought: Ann Arbor Public Schools Board of Education, Board Member

Campaign/Donation Page(s) Reviewed: votepuno.com; <https://secure.actblue.com/donate/votepuno> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed the website located at votepuno.com for Aaron J. Puno, a candidate for the Ann Arbor Public Schools Board of Education. The footer of the page states “Paid for by Aaron J. Puno for Ann Arbor School Board • Ann Arbor, MI.” No street address or post office box for the committee appears anywhere on the page; only a city and state are given. The footer's use of the phrase “Aaron J. Puno for Ann Arbor School Board”—combining the candidate's name with the office he seeks—constitutes express advocacy for his election within the meaning of *Golden v. Yahkind*, bringing the page within MCL 169.247's disclosure requirement.

B. Linked Donation Page (Exhibit B)

Complainant's designee also accessed a linked donation page hosted at <https://secure.actblue.com/donate/votepuno> soliciting contributions to Aaron J. Puno. Its only funding-source disclosure is a footer notice stating that the platform itself is “paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” No statement identifying a campaign committee for the candidate, by name or address, appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

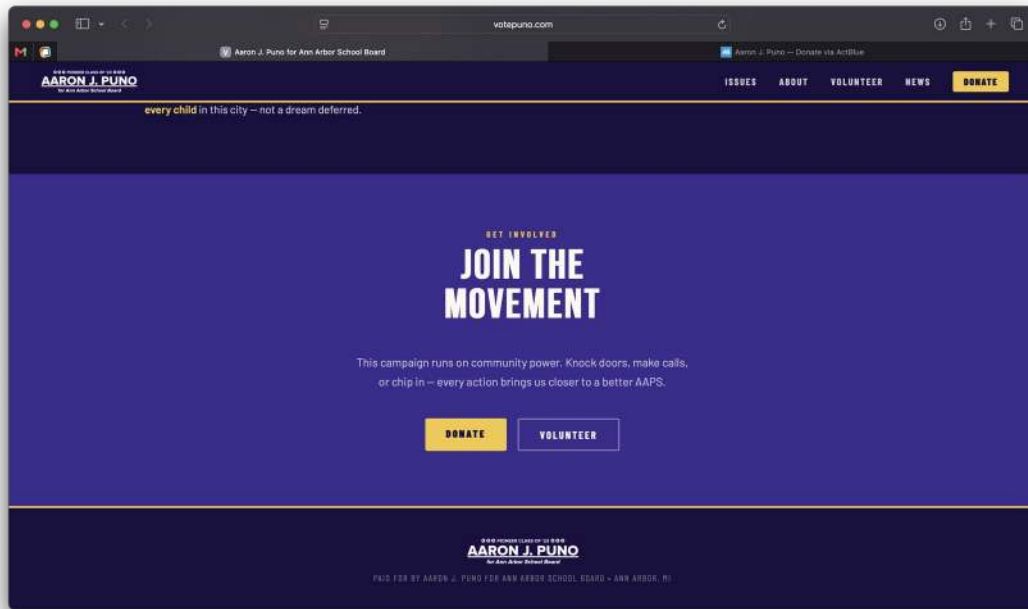
Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (website screenshot); Exhibit B (donation page screenshot)

EXHIBIT A

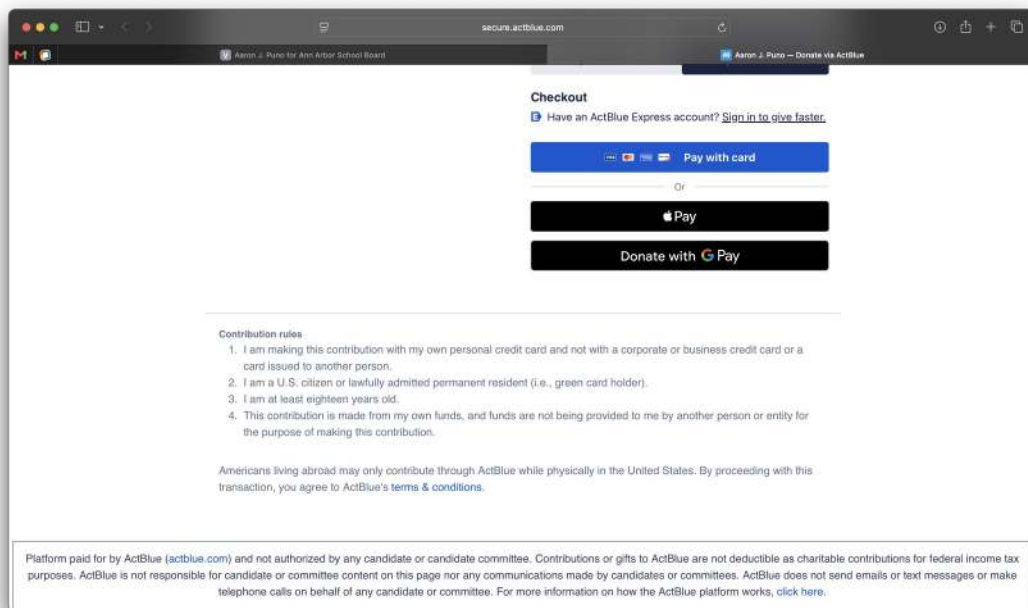
Screenshot of the votepero.com footer, captured on or about August 29, 2026



Website footer — committee named, but only city and state given, no street address

EXHIBIT B

Screenshot of the secure.actblue.com donation page for Aaron J. Puno, captured on or about August 29, 2026



Donation page checkout — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Ranjeev Puri — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Ranjeev Puri

Committee: Not identified by name in the material reviewed

Office Sought: State Representative, District 24

Campaign/Donation Page(s) Reviewed: voteranjeev.com (no separate website screenshot in evidence); <https://secure.actblue.com/donate/ranjeev-main> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed a donation page hosted at <https://secure.actblue.com/donate/ranjeev-main> soliciting contributions to Ranjeev Puri, a candidate for State Representative in District 24. The three images reviewed are sequential views of this single page, scrolled from top to bottom. The page displays Puri's campaign branding and a reference to www.voteranjeev.com, but its only funding-source disclosure, appearing at the bottom of the page, is a footer notice stating that the platform itself is “paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” No statement identifying a campaign committee for the candidate, by name or address, appears anywhere on the page. This display of Puri's campaign branding, together with the page's reference to the “vote” domain www.voteranjeev.com and its direct solicitation of contributions to his candidacy, constitutes express advocacy for his election within the meaning of *Golden v. Yahkind*, bringing the page within MCL 169.247's disclosure requirement.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

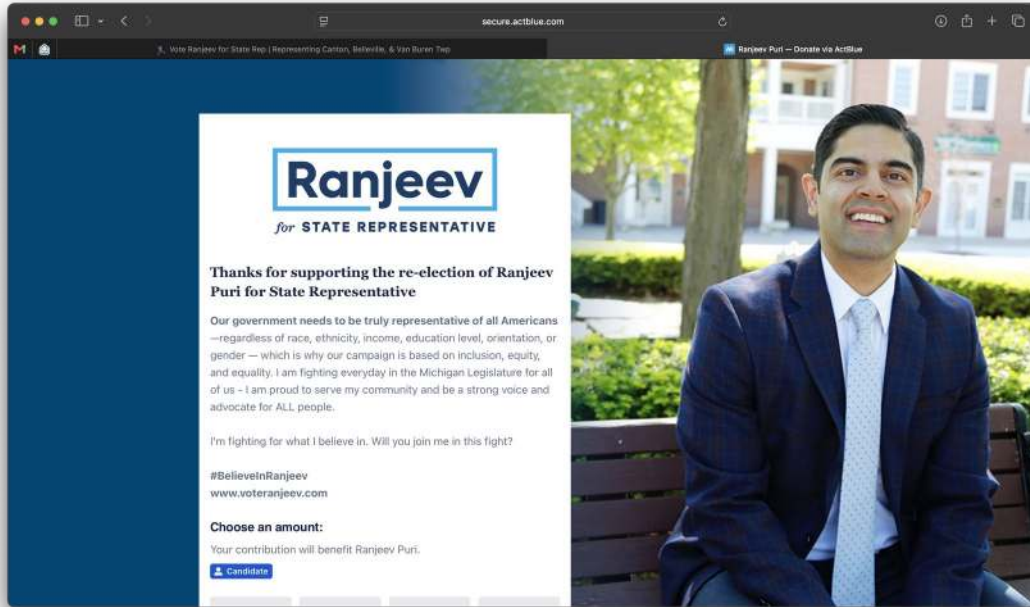
Signature: /s/ Vance Patrick

Printed Name: Vance Patrick
Date: August 31st, 2026

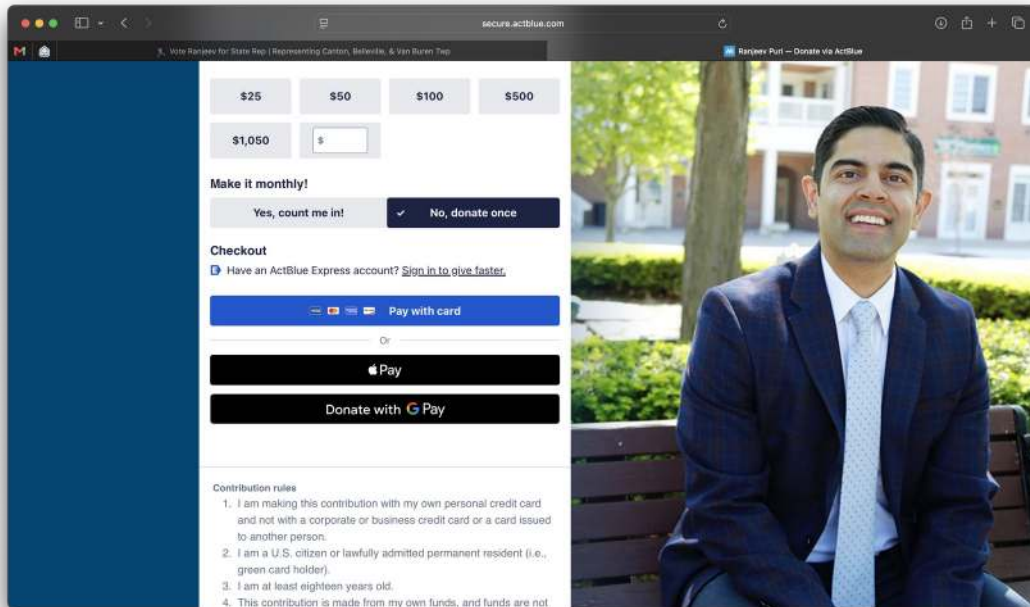
Enclosures: Exhibit A (donation page screenshots)

EXHIBIT A

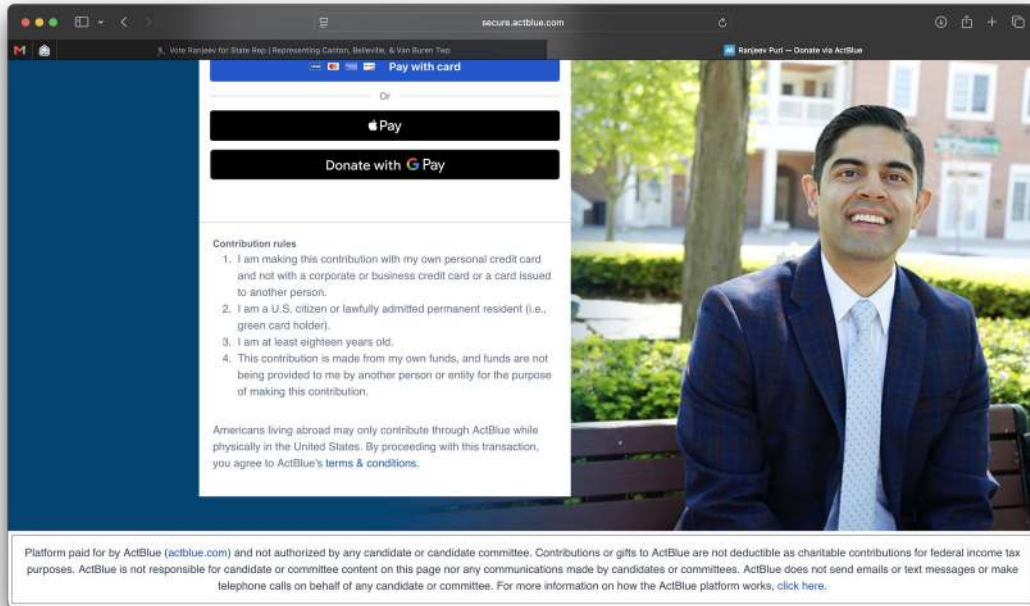
Screenshots of the *secure.actblue.com* donation page for Ranjeev Puri, captured on or about August 29, 2026 (three sequential views of the same page)



Top of donation page



Middle of donation page



Bottom of donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Yousef Rabhi — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Yousef Rabhi

Committee: Not identified by name in the material reviewed

Office Sought: Mayor of the City of Ann Arbor

Campaign/Donation Page(s) Reviewed: voteyousef.com (no separate website screenshot in evidence); <https://secure.actblue.com/donate/voteyousef> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed a donation page hosted at <https://secure.actblue.com/donate/voteyousef> soliciting contributions to Yousef Rabhi, a candidate for Mayor of the City of Ann Arbor. The page displays "Donate to Yousef Rabhi!" branding, but its only funding-source disclosure, appearing at the bottom of the page, is a footer notice stating that the platform itself is "paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee." No statement identifying a campaign committee for the candidate, by name or address, appears anywhere on the page. The page's "Donate to Yousef Rabhi!" branding is a direct call to action soliciting contributions to Rabhi's candidacy for Mayor and constitutes express advocacy for his election within the meaning of *Golden v. Yahkind*, bringing the page within MCL 169.247's disclosure requirement.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

Enclosures: Exhibit A (donation page screenshots)

EXHIBIT A

Screenshots of the *secure.actblue.com* donation page for Yousef Rabhi, captured on or about August 29, 2026

The screenshot shows the top half of a web browser window displaying the donation page for Yousef Rabhi. The browser's address bar shows 'secure.actblue.com' and the page title is 'Yousef Rabhi — Donate via ActBlue'. A 'Secured by ActBlue' badge is in the top right. The main heading is 'YUSEF RABHI DEMOCRAT for MAYOR' with a tree logo. Below this, the text 'Donate to Yousef Rabhi!' is followed by a message: 'Contribute today to support Yousef Rabhi for Mayor of Ann Arbor! Together we can restore power to the people!'. To the right, under 'Choose an amount:', it says 'Your contribution will benefit Yousef Rabhi.' and 'Candidates'. There are buttons for \$5, \$25, \$50, \$100, \$250, \$500, \$2,450, and a custom amount field. Below that, 'Make it monthly!' is followed by a text box: 'Your sustaining support allows us to create budgets and plan ahead!'. At the bottom of this section are two buttons: 'Yes, count me in!' and 'No, donate once' (which is selected). The 'Checkout' section begins with a link: 'Have an ActBlue Express account? Sign in to give faster.'

Upper portion of donation page

The screenshot shows the bottom half of the same web browser window. The 'Checkout' section is prominent, with a link: 'Have an ActBlue Express account? Sign in to give faster.' Below this are three payment options: 'Pay with card' (with Visa, Mastercard, and Amex logos), 'Or', 'Apple Pay', and 'Donate with Google Pay'. Below the payment options is a section titled 'Contribution rules' with four numbered items: 1. 'I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person.', 2. 'I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder).', 3. 'I am at least eighteen years old.', 4. 'This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution.' Below the rules, a note states: 'Americans living abroad may only contribute through ActBlue while physically in the United States. By proceeding with this transaction, you agree to ActBlue's terms & conditions.' At the very bottom, a small disclaimer reads: 'Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, click here.'

Lower portion of donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Rashida Harrison — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpattickmi@gmail.com

2. Respondent Information

Candidate: Rashida Harrison

Committee: Committee to Elect Dr. Rashida Harrison

Office Sought: State Senate, District 28

Campaign/Donation Page(s) Reviewed: rashidaharrisonforstatesenate.com;
<https://secure.actblue.com/donate/rashida-harrison-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the website located at rashidaharrisonforstatesenate.com for Dr. Rashida Harrison, a candidate for Michigan State Senate District 28. The site's browser tab is titled "Dr Rashida Harrison for Michigan state senate | Join the Movement Today," and the visible donation module displays direct calls to action, including a "\$50" and "Other amount" donation button.

In the footer, under the heading "DR. RASHIDA HARRISON FOR MICHIGAN STATE SENATE.," the site states, in a left-hand column, "Paid for by the Committee to Elect Dr. Rashida Harrison." No address appears adjacent to, or as part of, that statement. Separately, in a different footer column headed "LOCATION," set apart with its own heading and positioned to the right of the "Paid for by" text, the site lists an address: "PO Box 1070, East Lansing, MI 48826." Because the committee name and the address are presented in two visually and substantively separate blocks — one under the campaign-name heading with the "Paid for by" language, the other under a distinct "LOCATION" heading with no reference to the committee — they do not function as a single, self-contained, unified disclosure as required by MCL 169.247(1).

B. ActBlue Donation Page (Exhibit B)

Complainant's designee also accessed, on or about Monday, August 31, 2026, the linked ActBlue donation page at <https://secure.actblue.com/donate/rashida-harrison-1>, browser tab titled "Rashida Harrison — Donate via ActBlue." The page displays a campaign graphic showing a photograph of the candidate beside a purple panel reading "Dr. RASHIDA HARRISON — For Michigan State Senate." The headline states, "Support Dr. Rashida Harrison for Michigan State Senate District 28!" followed by campaign messaging describing the candidate as "a working mother, educator, union member, and community organizer" and stating she is "running to champion working families and build an economy where everyone can thrive." The page further states, "This is a people-powered campaign, and it is winnable — but we need your help. Whether you give \$5, \$50, or \$500, or some of your time and energy:

your contribution matters," and "She is running not because the system invited her in, but because the people did." The donation module states "Choose an amount: Your contribution will benefit Rashida Harrison" beside a "Candidate" tag.

No committee name or address appears anywhere on the ActBlue donation page itself. The only disclosure present is ActBlue's own standard platform notice at the bottom of the page: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee..." This is ActBlue's generic boilerplate describing its own role, not a disclosure by or on behalf of the Committee to Elect Dr. Rashida Harrison, and does not satisfy MCL 169.247(1).

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

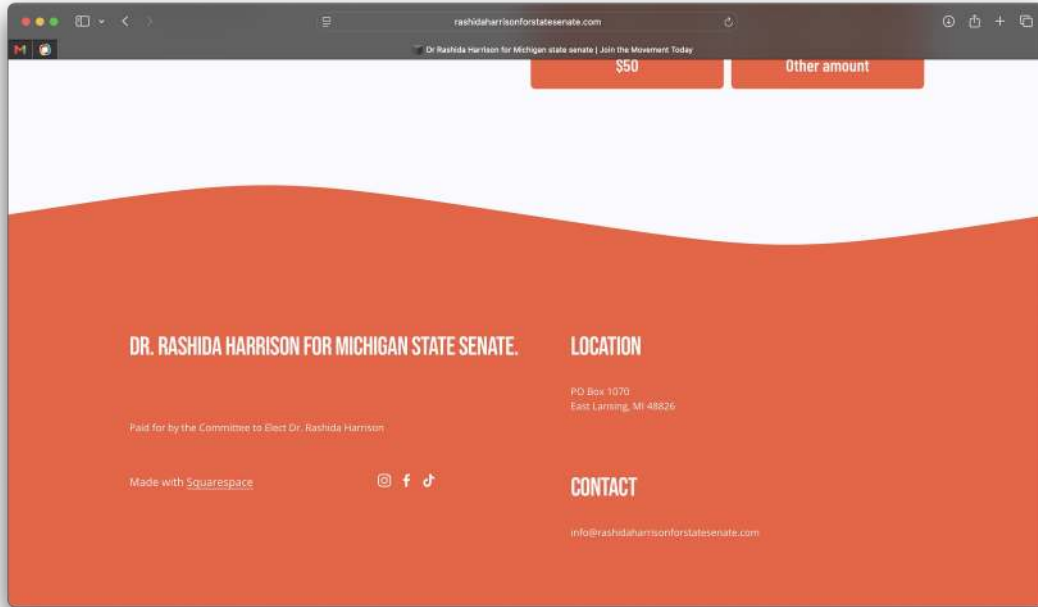
I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

Enclosures: Exhibit A (campaign website screenshot); Exhibit B (ActBlue donation page screenshots)

EXHIBIT A

Screenshot of the rashidaharrisonforstatesenate.com campaign website, captured on or about August 31, 2026



Campaign website footer — "Paid for by the Committee to Elect Dr. Rashida Harrison" (no address) set apart from a separately-headed "LOCATION" address block

EXHIBIT B

Screenshots of the secure.actblue.com donation page for Rashida Harrison, captured on or about August 31, 2026

This screenshot shows the top half of a donation page. On the left, there is a campaign graphic for Dr. Rashida Harrison, Michigan State Senate District 28, featuring her photo and a list of her policy goals. To the right of the graphic, the text reads: "Support Dr. Rashida Harrison for Michigan State Senate District 28!" followed by a paragraph about her background and the campaign's goals. Further right, under the heading "Choose an amount:", there are buttons for \$5, \$10, \$25, \$50, \$100, \$200, and \$500, along with a custom amount input field. Below this is a "Make it monthly!" section with a text box for a sustaining support amount and two radio buttons: "Yes, count me in!" and "No, donate once" (which is selected). At the bottom right of this section is a "Checkout" link.

Upper portion of donation page — campaign graphic and express-advocacy messaging

This screenshot shows the bottom half of the donation page. On the left, it continues the campaign text from the previous section. On the right, there are two radio buttons: "Yes, count me in!" and "No, donate once" (which is selected). Below this is a "Checkout" section with a link to "Sign in to give faster" for ActBlue Express accounts. There are two payment options: "Pay with card" (with a Visa logo) and "Apple Pay" (with an Apple logo). Below the payment options is a "Contribution rules" section with four numbered rules. At the bottom, there is a disclaimer: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, click here."

Lower portion of donation page — only ActBlue's generic platform notice appears; no committee-specific disclaimer

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Kiel Reid — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Kiel Reid

Committee: Not identified by name in the material reviewed

Office Sought: State Representative, District 88

Campaign/Donation Page(s) Reviewed: kielreid.com; <https://secure.actblue.com/donate/kiel-reid-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. ActBlue Donation Page (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the ActBlue donation page located at <https://secure.actblue.com/donate/kiel-reid-1>, used to solicit contributions for Kiel Reid, a candidate for State Representative, Michigan's 88th District. The browser tab is titled "Kiel Reid — Donate via ActBlue." The page displays an express-advocacy banner graphic reading "REID" over a ribbon stating "FOR STATE REPRESENTATIVE." The headline states, "Donate to Kiel Reid!" followed by campaign messaging: "Pitch in today to support Kiel Reid for the Michigan House of Representatives - District 88. Together, we can move our community forward." The donation module states "Choose an amount: Your contribution will benefit Kiel Reid" beside a "Candidate" tag.

No "Paid for by" statement or committee name/address appears in that format anywhere on the page. In small italicized text near the bottom of the page, unconnected to any "paid for by" language and without any address, the page states: "By contributing, you may receive occasional emails from Kiel Reid for State Representative about the campaign, upcoming events, ways to get involved, and opportunities to support this work. You can unsubscribe at any time." This is an email-opt-in notice, not a campaign finance disclosure, and it does not identify a committee name or address in the manner required by MCL 169.247(1); accordingly, no committee is identified by name in the material reviewed. The only disclosure on the page is ActBlue's own standard platform notice: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee...", which is the platform's own generic boilerplate and does not satisfy the statute.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and

- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (ActBlue donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Kiel Reid, captured on or about August 31, 2026

The screenshot shows the top half of a donation page. At the top center is a dark blue banner with the word "REID" in large white serif font, with "STATE REPRESENTATIVE" in smaller white sans-serif font below it. To the left of the banner, the text "Donate to Kiel Reid!" is followed by a paragraph: "Pitch in today to support Kiel Reid for the Michigan House of Representatives - District 88. Together, we can move our community forward." To the right of the banner, under the heading "Choose an amount:", there is a subtext "Your contribution will benefit Kiel Reid." and a "Candidate" button. Below this are buttons for \$25, \$50, \$100, \$200, \$300, \$500, \$1,000, and a custom amount field. Further down, under "Make it monthly!", there is a subtext "Your sustaining support allows us to create budgets and plan ahead!" and two buttons: "Yes, count me in!" and "No, donate once" (which is selected). At the bottom of this section is a "Checkout" button.

Upper portion of donation page — campaign banner graphic and express-advocacy messaging

The screenshot shows the bottom half of the donation page. At the top, there is a link "Have an ActBlue Express account? [Sign in to give faster.](#)". Below this are three payment options: "Pay with card", "Or", "Apple Pay", and "Donate with Google Pay". Underneath the payment options is a section titled "Contribution rules" with four numbered points: 1. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person. 2. I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder). 3. I am at least eighteen years old. 4. This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution. Below the rules is a paragraph: "By contributing, you may receive occasional emails from Kiel Reid for State Representative about the campaign, upcoming events, ways to get involved, and opportunities to support this work. You can unsubscribe at any time." Another paragraph follows: "Americans living abroad may only contribute through ActBlue while physically in the United States. By proceeding with this transaction, you agree to ActBlue's [terms & conditions](#)." At the very bottom, a small disclaimer states: "Platform paid for by ActBlue ([actblue.com](#)) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, [click here](#)."

Lower portion of donation page — only ActBlue's generic platform notice appears; no committee-specific disclaimer

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Anna Aho Rink — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrikmi@gmail.com

2. Respondent Information

Candidate: Anna Aho Rink

Committee: Not identified by name in the material reviewed

Office Sought: State Representative, District 109

Campaign/Donation Page(s) Reviewed: annaahorink4mi.com; <https://secure.actblue.com/donate/anna-aho-rink-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. ActBlue Donation Page (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the ActBlue donation page located at <https://secure.actblue.com/donate/anna-aho-rink-1>, used to solicit contributions for Anna Aho Rink, a candidate for State Representative, Michigan's 109th District. The browser tab is titled "Anna Aho Rink — Donate via ActBlue," and the page also displays a second open tab titled "Anna Aho Rink for State Representative," indicating a linked campaign website. The donation page displays an express-advocacy logo graphic reading "Anna Aho RINK" (with a stylized fish/dolphin icon incorporated into the letter "I") over a banner stating "for STATE REPRESENTATIVE." The page repeats the heading "Anna Aho Rink for State Representative" and states, "Choose an amount: Your contribution will benefit Anna Aho Rink," beside a "Candidate" tag and dollar-amount donation buttons.

No committee name or address of any kind appears anywhere on the two screenshots of this donation page. The only disclosure present is ActBlue's own standard platform notice at the bottom of the page: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page..." This is ActBlue's own generic platform boilerplate; it does not identify any committee or address for Anna Aho Rink and does not satisfy MCL 169.247(1).

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

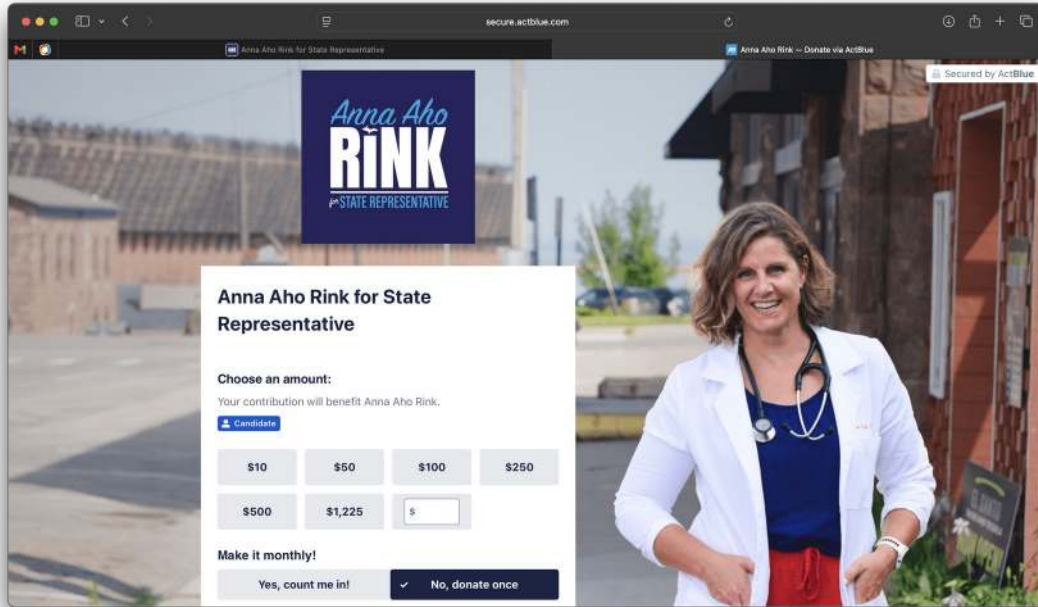
Printed Name: Vance Patrick

Date: August 31st, 2026

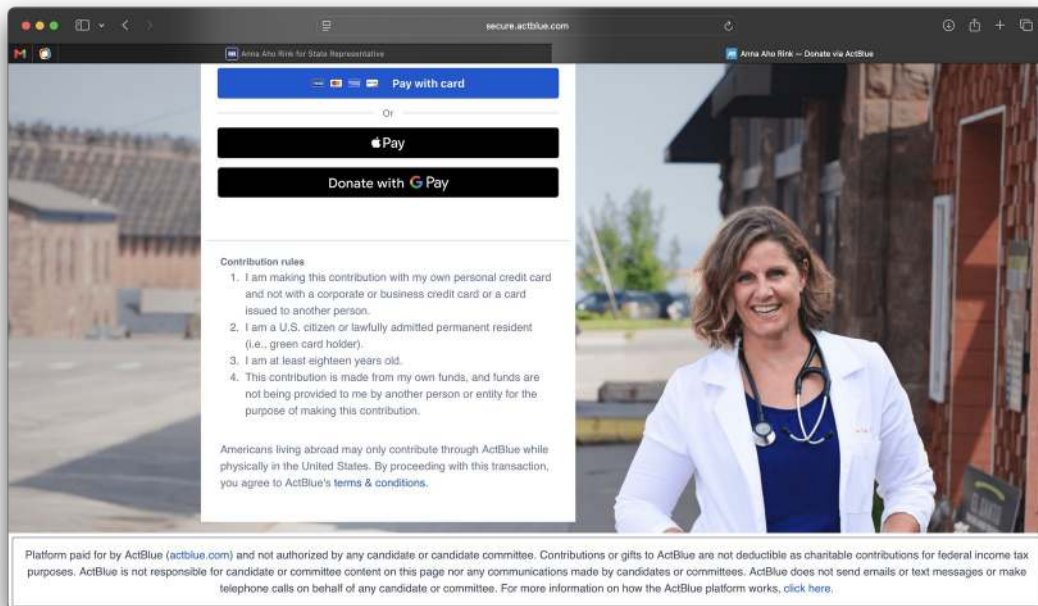
Enclosures: Exhibit A (ActBlue donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Anna Aho Rink, captured on or about August 31, 2026



Upper portion of donation page — campaign banner graphic and express-advocacy messaging; no committee disclaimer visible



Lower portion of donation page — only ActBlue's generic platform notice appears; no committee-specific disclaimer

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Regina Ross — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Regina Ross

Committee: Friends of Regina Ross

Office Sought: State Representative, District 4

Campaign/Donation Page(s) Reviewed: reginaross.com

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed the website located at reginaross.com for Regina Ross, a candidate for State Representative in District 4. The site's footer is arranged in separate columns: one column displays the campaign logo together with the statement “© 2026 Paid for by Friends of Regina Ross,” while a separate column, headed only by general contact details, lists a mailing address alongside an email address and phone number. The address does not appear together with, or as part of, the “Paid for by” statement; it is presented instead as general contact information for the campaign. No single unified statement combining the committee name with a mailing address appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

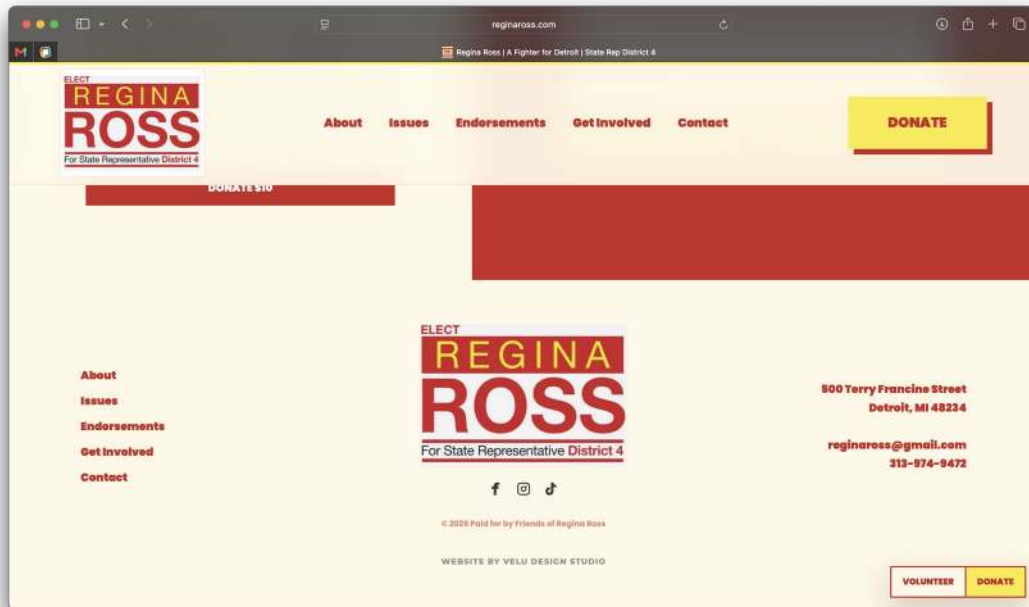
Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (website screenshot)

EXHIBIT A

Screenshot of the reginaross.com footer, captured on or about August 29, 2026



Website footer — committee named in one column; mailing address given separately, in a different column, as general contact information

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Serenity Hope Salak — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Serenity Hope Salak

Committee: CTE Serenity Hope Salak

Office Sought: State Representative, District 93

Campaign/Donation Page(s) Reviewed: serenityhope4mi.com;
<https://secure.actblue.com/donate/serenity-hope-93> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee’s address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the website located at serenityhope4mi.com for Serenity Hope Salak, a candidate for State Representative, Michigan's 93rd District. The browser tab itself is an express-advocacy statement: "SERENITY HOPE for STATE REP | Join the Movement Today!" The homepage displays the campaign slogan headline "I'm Fighting for Families." and sub-headline "A Michigan that works for everyone starts with lifting up our Working Class." beside a photograph of the candidate. The footer states "Serenity Hope Salak for State Representative" next to a prominent white "Donate" button, a direct call to action, along with social-media icons.

No "Paid for by" disclosure, committee name, or address of any kind appears anywhere in the portion of the website captured in this screenshot.

B. ActBlue Donation Page (Exhibit B)

Complainant's designee also accessed, on or about Monday, August 31, 2026, the linked ActBlue donation page at <https://secure.actblue.com/donate/serenity-hope-93>, browser tab titled "Serenity Hope Salak — Donate via ActBlue." The page displays an express-advocacy banner graphic reading "SERENITY HOPE SALAK" over a red ribbon stating "FOR STATE REPRESENTATIVE." The headline states, "Serenity Hope Salak For State Rep!" followed by campaign messaging: "Help send Serenity to Lansing to represent the 93rd House District!", "When good governance meets common sense reforms, Working Families Win!", and a bulleted list beginning "Working Families DEMAND:" listing policy demands. The page further states, "This campaign is powered by people like you--not corporations or Big Industry," and "Your contribution buys campaign lit, ads and postage--plus snacks for hardworking volunteers!"

Below that messaging, and set off from it as a distinct instruction rather than a "Paid for by" statement, the page states: "Please make checks payable to: CTE Serenity Hope Salak and mail to: 1630 Van Wagoner Drive, Saginaw, MI 48638." This is a "mail a check" instruction, not a self-contained "Paid for

by [Committee], [Address]" statement as required by MCL 169.247(1); although it places a committee-like name and an address in proximity, it is phrased and formatted as payment instructions for those who wish to contribute by check, not as the statutory disclaimer applicable to the page as a whole. No separate compliant "Paid for by" statement appears anywhere else on the page. The only additional disclosure present is ActBlue's own standard platform notice at the bottom of the page: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee...", which is the platform's own generic boilerplate and does not satisfy the statute.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

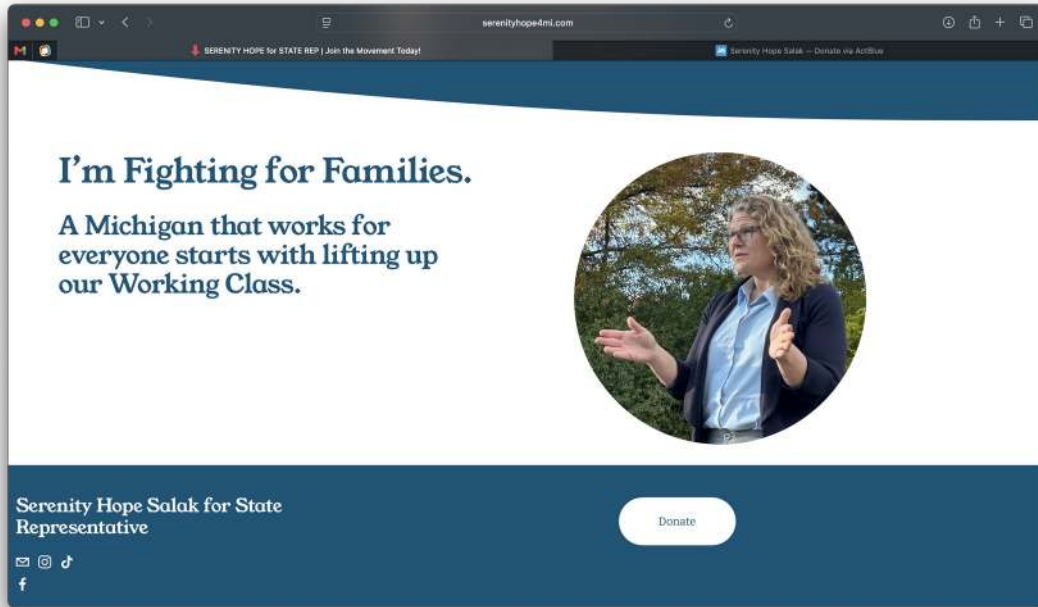
Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (campaign website screenshot); Exhibit B (ActBlue donation page screenshots)

EXHIBIT A

Screenshot of the serenityhope4mi.com campaign website, captured on or about August 31, 2026



Campaign website — slogan headline and footer "Donate" call to action; no disclaimer of any kind visible

EXHIBIT B

Screenshots of the secure.actblue.com donation page for Serenity Hope Salak, captured on or about August 31, 2026

The screenshot shows the top portion of the donation page. At the top is a campaign banner for "SERENITY HOPE SALAK FOR STATE REPRESENTATIVE" with a blue and red design. Below the banner, the text "Serenity Hope Salak For State Rep!" is followed by a call to action: "Help send Serenity to Lansing to represent the 93rd House District!". A list of demands is provided: "Working Families DEMAND: -affordable and accessible healthcare, -good paying jobs you can support a family on, -no-cost before- and after-school programs so parents can get to work or retrain for a new job, -that their elected officials serve them and not private interests." To the right, under "Choose an amount:", there are buttons for \$5, \$10, \$20, \$40, \$60, \$100, and \$200, along with a custom amount field. Below this is a "Make it monthly!" section with a text box for sustaining support and two buttons: "Yes, count me in!" and "No, donate once". At the bottom right is a "Checkout" button.

Upper portion of donation page — campaign banner graphic and express-advocacy messaging

The screenshot shows the lower portion of the donation page. On the left, it states "This campaign is powered by people like you—not corporations or Big Industry." and "Your contribution buys campaign lit, ads and postage—plus snacks for hardworking volunteers!". It also provides the website "serenityhope4mi.com" and check payment instructions: "Please make checks payable to: CTE Serenity Hope Salak and mail to: 1630 Van Wagoner Drive, Saginaw, MI 48638." On the right, the "Checkout" section offers a link to "Sign in to give faster" for ActBlue Express accounts, followed by buttons for "Pay with card", "Apple Pay", and "Donate with Google Pay". Below this, "Contribution rules" are listed in four numbered points. At the bottom, a disclaimer states: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, click here."

Lower portion of donation page — "mail a check to" instruction naming "CTE Serenity Hope Salak" and an address, plus ActBlue's generic platform notice; no unified "Paid for by" statement

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Stephen Schlaack — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Stephen Schlaack

Committee: Friends of Stephen Schlaack for State Representative

Office Sought: State Representative, District 71

Campaign/Donation Page(s) Reviewed: stephen4staterep.com;
<https://secure.actblue.com/donate/stephenforstaterep> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee’s address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. ActBlue Donation Page (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the ActBlue donation page located at <https://secure.actblue.com/donate/stephenforstaterep>, used to solicit contributions for Stephen Schlaack, a candidate for State Representative, Michigan's 71st District. The browser tab is titled "Stephen Schlaack for Michigan State Representative — District 71." The page headline states, "I'm in - let's win this!" followed by direct campaign messaging: "Let's win this! I'm fighting for common sense, local values, good-paying jobs, and Michigan farms. Chip in now and help take our seat back!" The donation module states "Choose an amount: Your contribution will benefit Stephen Schlaack" beside a "Candidate" tag.

Below that messaging, and presented as payment instructions rather than a "Paid for by" disclaimer, the page states: "Thank you for your support! If you prefer to make a contribution by check, non-corporate checks may be mailed to: Friends of Stephen Schlaack for State Representative, PO Box 423, Owosso, MI 48867." This is a "mail a check" instruction, not a self-contained "Paid for by [Committee], [Address]" statement as required by MCL 169.247(1). Although it places a committee name and an address together, it is phrased for those who wish to contribute by check rather than as the statutory disclaimer for the page as a whole, and no separate compliant "Paid for by" statement appears anywhere else on the page. The only additional disclosure present is ActBlue's own standard platform notice at the bottom of the page: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee...", which is the platform's own generic boilerplate and does not satisfy the statute.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and

- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (ActBlue donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Stephen Schlaack, captured on or about August 31, 2026

I'm in - let's win this!

Let's win this! I'm fighting for common sense, local values, good-paying jobs, and Michigan farms. Chip in now and help take our seat back!

Thank you for your support!

If you prefer to make a contribution by check, non-corporate checks may be mailed to:

Friends of Stephen Schlaack for State Representative
PO Box 423
Owosso, MI 48867

Choose an amount:
Your contribution will benefit Stephen Schlaack.

[Candidate](#)

\$10 \$50 \$100 \$250

\$500 \$1,000

Make it monthly!

☐ Yes, count me in! ☒ No, donate once

Checkout

☐ Have an ActBlue Express account? [Sign in to give faster.](#)

[Pay with card](#)

Or

[Apple Pay](#)

[Donate with Google Pay](#)

Contribution rules

1. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person.

Donation page — express-advocacy campaign messaging and "mail a check to" instruction naming "Friends of Stephen Schlaack for State Representative" and an address

Checkout

☐ Have an ActBlue Express account? [Sign in to give faster.](#)

[Pay with card](#)

Or

[Apple Pay](#)

[Donate with Google Pay](#)

Contribution rules

1. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person.
2. I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder).
3. I am at least eighteen years old.
4. This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution.

Americans living abroad may only contribute through ActBlue while physically in the United States. By proceeding with this transaction, you agree to ActBlue's [terms & conditions](#).

Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, [click here](#).

Lower portion of donation page — only ActBlue's generic platform notice appears; no unified "Paid for by" statement

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Matt Schlinker — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Matt Schlinker

Committee: Friends of Matt Schlinker

Office Sought: State Representative, District 68

Campaign/Donation Page(s) Reviewed: mattschlinker4rep.com;
<https://secure.actblue.com/donate/schlinkerweb> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Friday, August 28, 2026, Complainant's designee accessed the website located at mattschlinker4rep.com for Matt Schlinker, a candidate for Michigan State Representative, District 68. The page footer displays a distinct bordered text box reading “PAID FOR BY FRIENDS OF MATT SCHLINKER.” No address appears inside or immediately adjacent to that box. An address (“10457 VALLEY CREEK DR. GOODRICH, MI 48438”) appears elsewhere in the same footer, in an unrelated column alongside links to an Accessibility Statement, Terms of Service, and Contact page, rather than as part of the “Paid for by” identification itself.

B. Linked Donation Page (Exhibit B)

Complainant's designee also accessed the linked donation page hosted at <https://secure.actblue.com/donate/schlinkerweb> soliciting contributions to Matt Schlinker. In the “Contribution rules” section of that page, the text states “Paid for by Friends of Matt Schlinker.” No address for the committee appears anywhere on this page; the only other funding-source text present is ActBlue's own generic platform disclaimer, which does not supply one. This solicitation of contributions to Matt Schlinker constitutes express advocacy for his election under *Golden v. Yahkind*, bringing the page within MCL 169.247's disclosure requirement.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

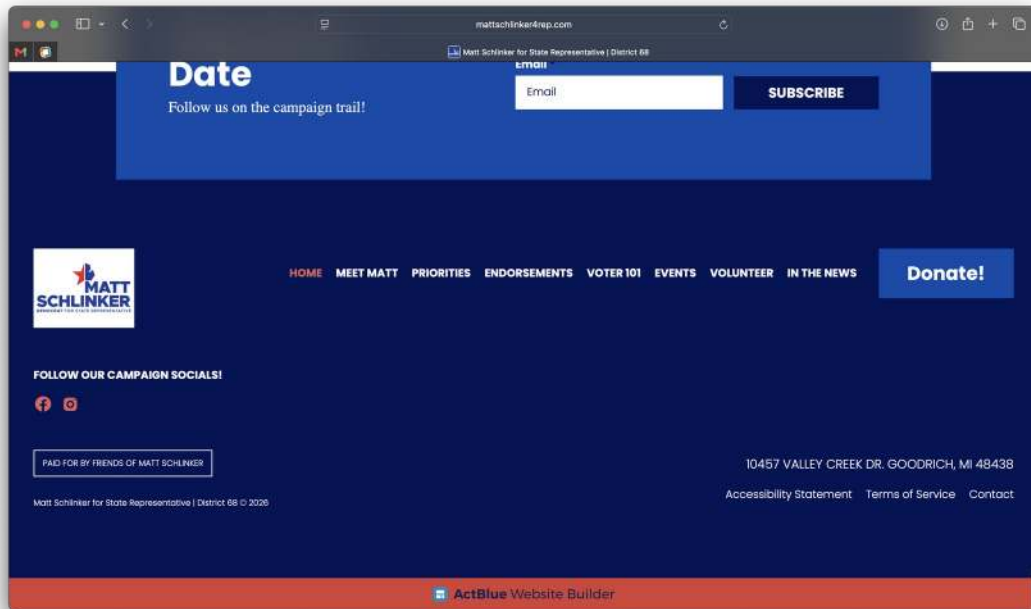
Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (website footer screenshot); Exhibit B (donation page screenshot)

EXHIBIT A

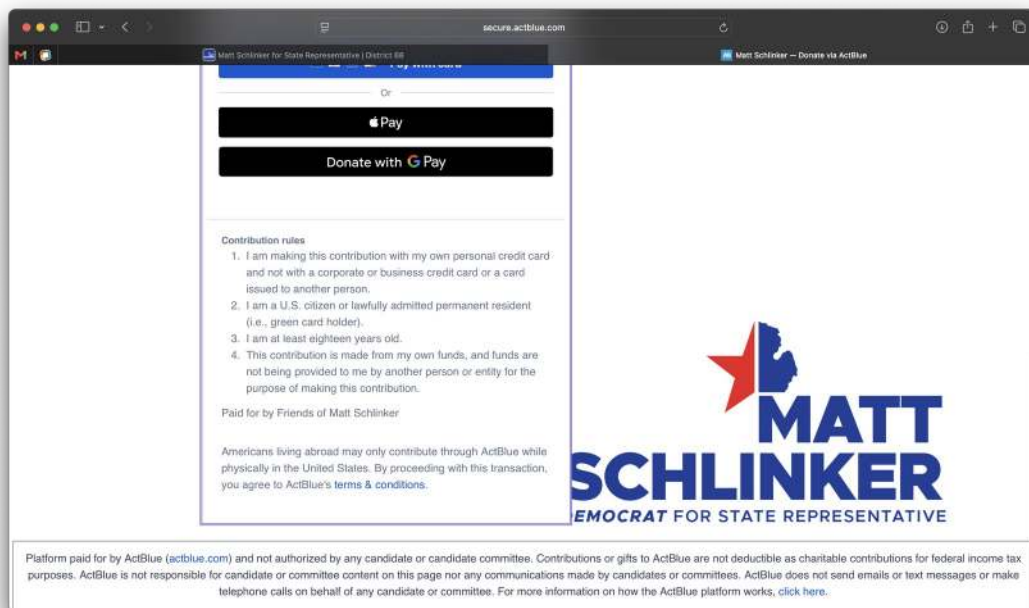
Screenshot of the mattschlinker4rep.com footer, captured on or about August 28, 2026



Website footer — “Paid for by” box (left) does not include the address shown separately (right)

EXHIBIT B

Screenshot of the secure.actblue.com donation page for Matt Schlinker, captured on or about August 28, 2026



Donation page contribution rules — committee named, no address given

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Lily Cheng-Schulting — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Lily Cheng-Schulting

Committee: Not identified by name in the material reviewed

Office Sought: State Representative, District 80

Campaign/Donation Page(s) Reviewed: lilyformichigan.com; <https://secure.actblue.com/donate/lily26> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. ActBlue Donation Page (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the ActBlue donation page located at <https://secure.actblue.com/donate/lily26>, used to solicit contributions for Lily Cheng-Schulting, a candidate for State Representative, Michigan's 80th District. The browser tab is titled "Lily Cheng-Schulting — Donate via ActBlue." The page displays an express-advocacy banner graphic quoting "'PROGRESSIVE ADVOCATE FOR REAL CHANGE'" above a boxed campaign logo reading "LILY CHENG-SCHULTING — FOR STATE REPRESENTATIVE" with a stylized flower icon, superimposed on a bridge photograph, and a banner beneath it stating "VOTE BY AUGUST 4, 2026." The headline states, "Donate to Lily Cheng-Schulting," followed by first-person campaign messaging: "As a community organizer, a change agent, a disability & human rights advocate, a mother of two, and the daughter of immigrants, I will listen and fight fiercely for real solutions and change," and "Together, we can create a people-powered movement for human dignity, fairness, and opportunity." The donation module states "Choose an amount: Your contribution will benefit Lily Cheng-Schulting" beside a "Candidate" tag.

No committee name or address of any kind appears anywhere on the two screenshots of this donation page. The only disclosure present is ActBlue's own standard platform notice at the bottom of the page: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee..." This is ActBlue's own generic platform boilerplate; it does not identify any committee or address for Lily Cheng-Schulting and does not satisfy MCL 169.247(1).

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and

- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

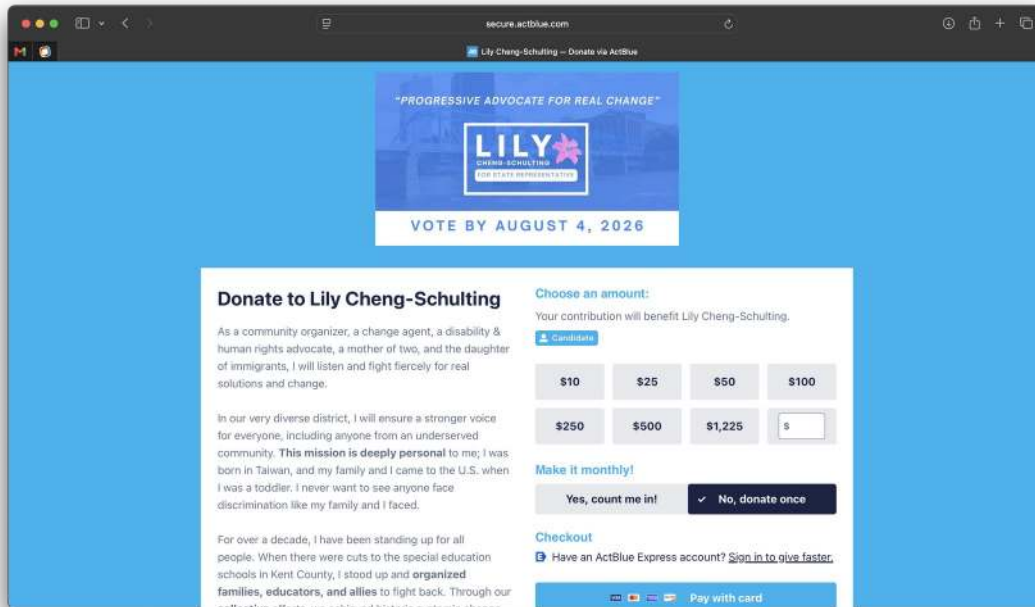
Printed Name: Vance Patrick

Date: August 31st, 2026

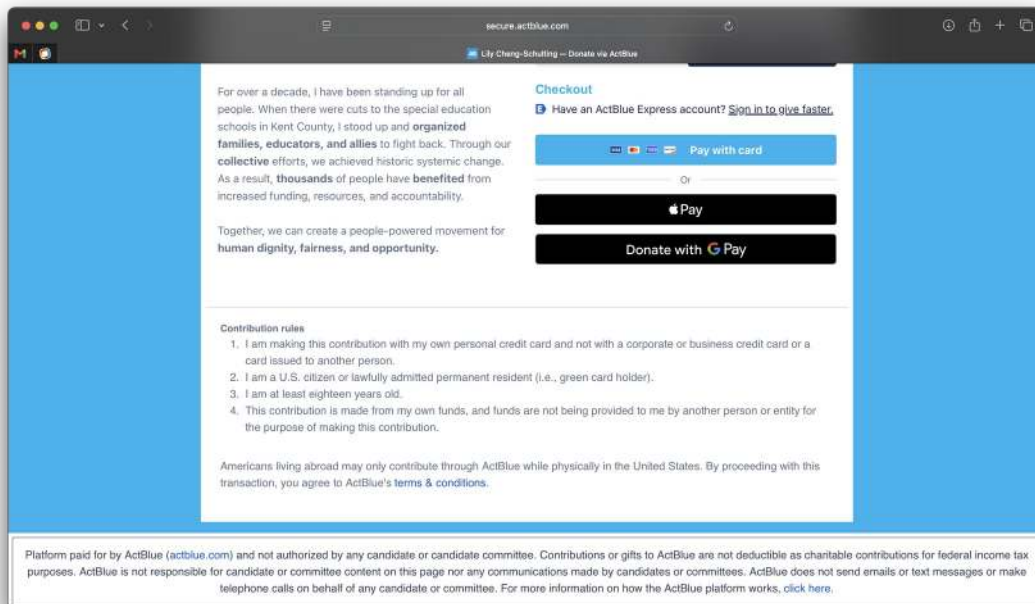
Enclosures: Exhibit A (ActBlue donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Lily Cheng-Schulting, captured on or about August 31, 2026



Upper portion of donation page — campaign banner graphic, slogan, and express-advocacy messaging; no committee disclaimer visible



Lower portion of donation page — only ActBlue's generic platform notice appears; no committee-specific disclaimer

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Carolyn Siebers — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpattickmi@gmail.com

2. Respondent Information

Candidate: Carolyn Siebers

Committee: VoteCarolynSiebers

Office Sought: Ann Arbor Public Schools Board of Education, Board Member

Campaign/Donation Page(s) Reviewed: [votecarolynsiebers.com](https://secure.actblue.com/donate/carolyn-siebers-1);
<https://secure.actblue.com/donate/carolyn-siebers-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee’s address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed the website located at votecarolynsiebers.com for Carolyn Siebers, a candidate for the Ann Arbor Public Schools Board of Education. The footer of the page states “Paid for by VoteCarolynSiebers,” followed by a copyright notice. No mailing address for the committee appears anywhere on the page. Both the website's domain, votecarolynsiebers.com, and the committee name “VoteCarolynSiebers” itself embed a direct “Vote Carolyn Siebers” call to action, constituting express advocacy for her election within the meaning of *Golden v. Yahkind* and bringing the page within MCL 169.247's disclosure requirement.

B. Linked Donation Page (Exhibit B)

Complainant's designee also accessed a linked donation page hosted at <https://secure.actblue.com/donate/carolyn-siebers-1> soliciting contributions to Carolyn Siebers. The page states that contributors who prefer to give by check should “make it out to VoteCarolynSiebers and mail to: VoteCarolynSiebers, P.O. Box 1962, Ann Arbor, MI 48106.” This address appears only as part of check-mailing instructions, not as part of any “Paid for by” statement identifying the committee. The page's only funding-source disclaimer, appearing separately in a footer notice, states that the platform itself is “paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” No single unified statement combining the committee name with a mailing address appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and

- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

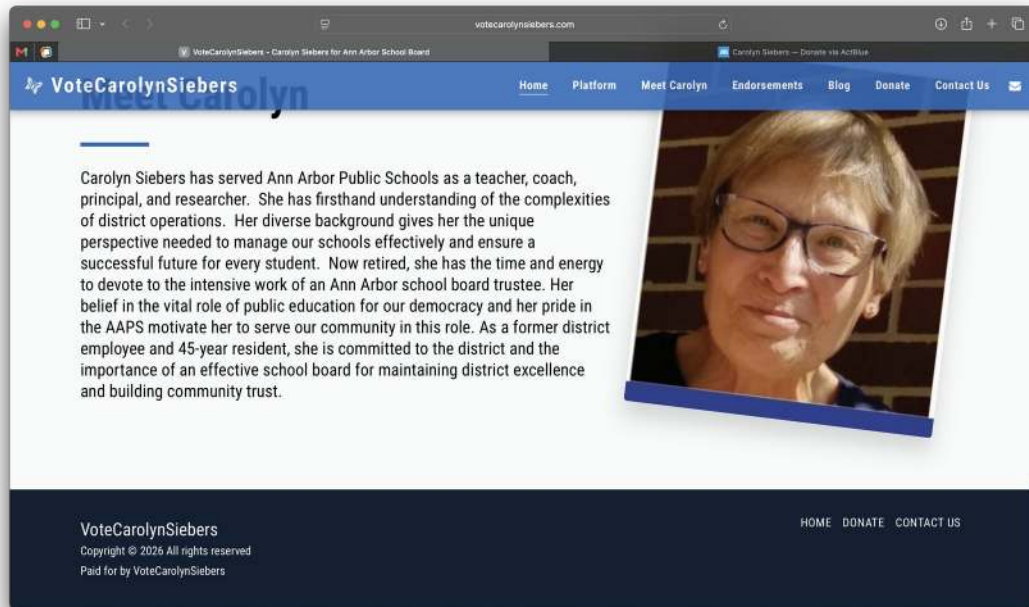
Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (website screenshot); Exhibit B (donation page screenshot)

EXHIBIT A

Screenshot of the voteCarolynsiebers.com footer, captured on or about August 29, 2026



Website footer — committee named but no address given

EXHIBIT B

Screenshot of the secure.actblue.com donation page for Carolyn Siebers, captured on or about August 29, 2026

check, please make it out to VoteCarolynSiebers and mail to
VoteCarolynSiebers
P.O. Box 1962
Ann Arbor, MI 48106

Checkout
Have an ActBlue Express account? [Sign in to give faster.](#)

[Pay with card](#)

Or

[Apple Pay](#)

[Donate with Google Pay](#)

Contribution rules

1. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person.
2. I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder).
3. I am at least eighteen years old.
4. This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution.

Americans living abroad may only contribute through ActBlue while physically in the United States. By proceeding with this transaction, you agree to ActBlue's [terms & conditions](#).

Platform paid for by ActBlue ([actblue.com](#)) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, [click here](#).

Donation page — address given only as check-mailing instructions, separate from any “Paid for by” statement; generic ActBlue platform notice below

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Khristian Silvis — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Khristian Silvis

Committee: Not identified by name in the material reviewed

Office Sought: State Representative, District 84

Campaign/Donation Page(s) Reviewed: votesilvis.com; <https://secure.actblue.com/donate/khristian-silvis-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. ActBlue Donation Page (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the online donation page for Khristian Silvis, candidate for State Representative, District 84, located at secure.actblue.com (linked from votesilvis.com and identified in the browser tab as "Khristian Silvis — Donate via ActBlue"). The page is captioned "Donate To Khristian Silvis!" and displays a campaign photograph of the candidate bearing the graphic "KHRISTIAN SILVIS FOR STATE REPRESENTATIVE." Accompanying text states: "Donate today to support Candidate Khristian Silvis for Michigan House of Representatives - District 84," and further states that "Your contribution helps our campaign connect with voters, organize community events and build a stronger, safer, and more prosperous district for everyone." The page presents donation-amount buttons (\$10 through \$1,225), a "Make it monthly!" option, and "Pay with card," Apple Pay, and Google Pay checkout buttons soliciting immediate financial contributions.

At no point on the page — including the sections captured above the fold and after scrolling through the full donation form and "Contribution rules" — does any statement identifying a candidate committee name and address appear together as a unified disclosure. The only disclaimer-type language present on the page is ActBlue's own standard platform notice, set off at the very bottom in a bordered box: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee." This is ActBlue's own generic disclaimer describing the platform, not a "Paid for by [Committee Name], [Address]" statement identifying the Silvis candidate committee. No committee name or address for the Silvis campaign appears anywhere on the page reviewed.

5. Requested Relief

- Investigate the facts alleged in this complaint;

- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

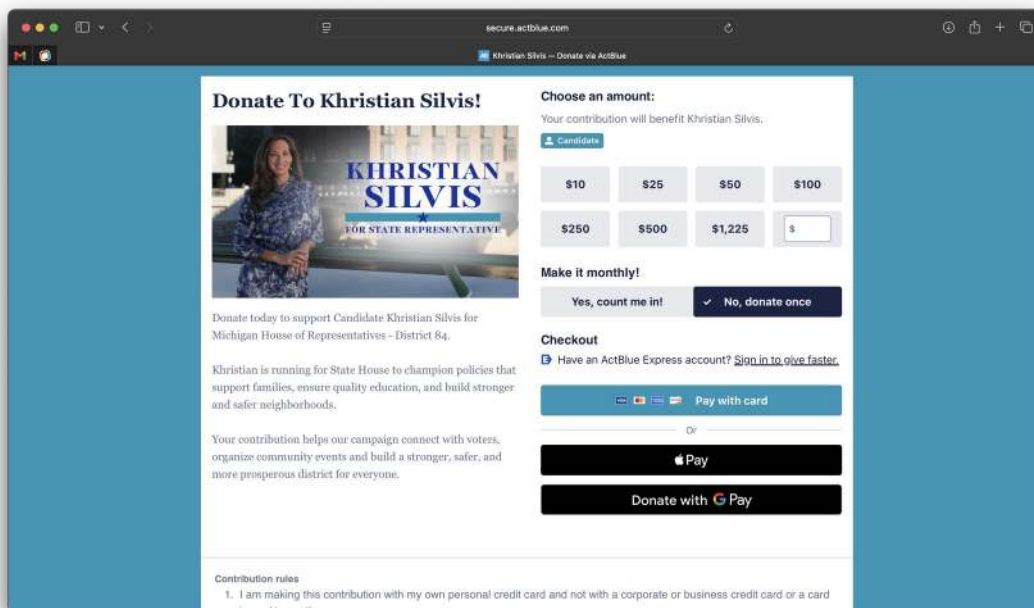
Printed Name: Vance Patrick

Date: August 31st, 2026

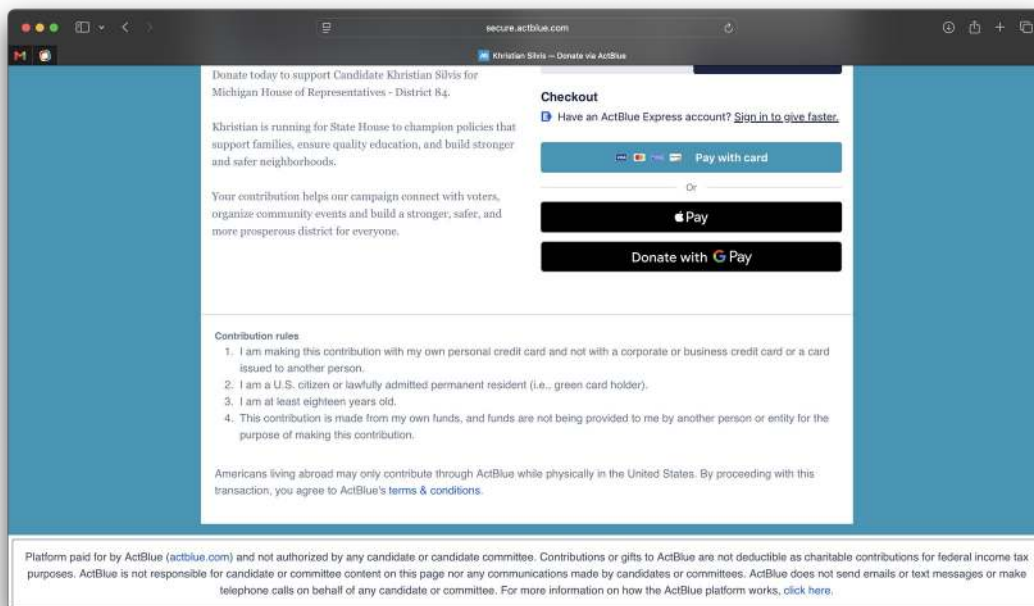
Enclosures: Exhibit A (ActBlue donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Khristian Silvis, captured on or about August 31, 2026



Upper portion of donation page, showing "Donate To Khristian Silvis!" heading and campaign photo/logo graphic



Lower portion of donation page, showing checkout options and ActBlue's generic platform disclaimer at bottom — no committee name or address appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Brandon Smith — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrikmi@gmail.com

2. Respondent Information

Candidate: Brandon Smith

Committee: Not identified by name in the material reviewed

Office Sought: Ann Arbor Public Schools Board of Education, Board Member

Campaign/Donation Page(s) Reviewed: votebrandonforboard.com (no separate website screenshot in evidence); <https://secure.actblue.com/donate/brandon-smith-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed a donation page hosted at <https://secure.actblue.com/donate/brandon-smith-1> soliciting contributions to Brandon Smith, a candidate for the Ann Arbor Public Schools Board of Education. The page displays “Donate to Brandon Smith for Ann Arbor Public Schools!” branding and a closing message signed “Sincerely, Brandon Smith,” but its only funding-source disclosure, appearing at the bottom of the page, is a footer notice stating that the platform itself is “paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” No statement identifying a campaign committee for the candidate, by name or address, appears anywhere on the page. The page's “Donate to Brandon Smith for Ann Arbor Public Schools!” branding expressly combines the candidate's name, the office sought, and a direct call to donate, constituting express advocacy for Smith's election within the meaning of *Golden v. Yahkind* and bringing the page within MCL 169.247's disclosure requirement.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

Printed Name: Vance Patrick
Date: August 31st, 2026

Enclosures: Exhibit A (donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Brandon Smith, captured on or about August 29, 2026

The screenshot shows the top half of a donation page. At the top, there's a header with the name "Brandon Smith" in a large, bold font, followed by "for AAPS School Board" and the tagline "Parent. Teacher. Advocate." in a smaller font. Below this, the page is divided into two main columns. The left column contains a "Donate to Brandon Smith for Ann Arbor Public Schools!" section, which includes a short bio and a message from the candidate. The right column features a "Choose an amount:" section with a grid of buttons for \$5, \$10, \$20, \$25, \$50, \$100, and \$200, along with a custom amount input field. Below the amount selection is a "Make it monthly!" section with a checkbox and a "Yes, count me in!" button. At the bottom of the right column is a "Checkout" section with a link to "Have an ActBlue Express account? Sign in to give faster."

secure.actblue.com
Brandon Smith — Donate via ActBlue
Secured by ActBlue

Brandon Smith

for AAPS School Board
Parent. Teacher. Advocate.

Donate to Brandon Smith for Ann Arbor Public Schools!

Neighbors,

My name is Brandon Smith, and I'm running for the Ann Arbor Public Schools Board of Education.

The first question everyone asks is "Why are you running?" My answer is easy. My four year old daughter, Sadie. I want to make sure that AAPS is a place I am proud to send my daughter. Right now, I can't say that that's the case.

AAPS is struggling. Financially (\$14 Million accounting error, teacher contract issues), in leadership (division over cell phone policies), educationally (minority demographics lagging in test scores). As a longtime public school

Choose an amount:

Your contribution will benefit Brandon Smith.

☐ Candidate

\$5	\$10	\$20	\$25
\$50	\$100	\$200	<input type="text"/>

Make it monthly!

Your sustaining support allows us to create budgets and plan ahead!

☐ Yes, count me in! ☒ No, donate once

Checkout

[Have an ActBlue Express account? Sign in to give faster.](#)

Upper portion of donation page with candidate branding and message

The screenshot shows the bottom half of the donation page. On the left, there's a message from the candidate, Brandon Smith, explaining why he's running and expressing his gratitude for support. On the right, there are two large buttons for "Apple Pay" and "Donate with Google Pay". Below the candidate's message, there's a "Contribution rules" section with four numbered points. At the bottom, there's a disclaimer about the platform being paid for by ActBlue and not authorized by any candidate or committee, along with a link to the terms and conditions.

I'm running because I know we can do better. I have lived here my entire life, and I believe Ann Arbor has the people, talent, and commitment to make that happen. By bringing together the entire community, we can build a school system that supports every student and prepares them for the future.

That's why I'm running, and I would be honored to earn your support!

Sincerely,
Brandon Smith

Contribution rules

1. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person.
2. I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder).
3. I am at least eighteen years old.
4. This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution.

Americans living abroad may only contribute through ActBlue while physically in the United States. By proceeding with this transaction, you agree to ActBlue's [terms & conditions](#).

Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, [click here](#).

Lower portion of donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Jamie Sonneberger — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Jamie Sonneberger

Committee: The Committee to Elect Jamie Sonneberger

Office Sought: State Representative, District 63

Campaign/Donation Page(s) Reviewed: jamieforhouse.com; <https://secure.actblue.com/donate/jamie-sonneberger-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the campaign website located at jamieforhouse.com for Jamie Sonneberger, candidate for State Representative, District 63 (browser tab identified as "Jamie Sonneberger for Michigan House 63"). The captured portion of the site displays issue-platform cards captioned "Public Schools," "Leadership," and "Community," each containing express campaign messaging (e.g., "Providing steady, thoughtful leadership focused on our district's future"), and a footer "Connect" section soliciting an email sign-up ("Your Email" / "Enter email" / "Sign Up"), together with social-media icons and the statement "Questions? Reach out anytime. Email: info@jamieforhouse.com."

At the bottom of the footer, in small type beneath the copyright line, the site states: "© 2025. All rights reserved. Paid for by The Committee to Elect Jamie Sonneberger." This is the only disclaimer-type language visible on the page reviewed, and it identifies a committee name ("The Committee to Elect Jamie Sonneberger") but includes no committee address of any kind — no street address, post office box, city, state, or ZIP code appears anywhere on the page in conjunction with, or apart from, this statement. The statutory "Paid for by [Committee Name], [Address]" identification is therefore incomplete on its face.

B. ActBlue Donation Page (Exhibit B)

On or about Monday, August 31, 2026, Complainant's designee accessed the associated online donation page at secure.actblue.com (browser tab: "Jamie Sonneberger — Donate via ActBlue"), reached via a donate link from jamieforhouse.com. The page is captioned "Jamie Sonneberger for State House – District 63" and states: "Jamie Sonneberger is running for Michigan State House to bring steady leadership, strong public schools, and common-sense solutions to Lansing. Every contribution helps build a grassroots campaign focused on listening to our community and getting real work done." The page solicits contributions through preset amount buttons (\$5–\$100), a custom-amount field, a "Make it monthly!" recurring-donation option, and "Pay with card," Apple Pay, and Google Pay checkout buttons.

Neither the committee name "The Committee to Elect Jamie Sonneberger" nor any committee address appears anywhere on the donation page itself. The only disclaimer-type text present is ActBlue's standard platform notice at the bottom of the page: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee..." — again, ActBlue's own boilerplate, not a disclosure of the Sonneberger committee's identity or address.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

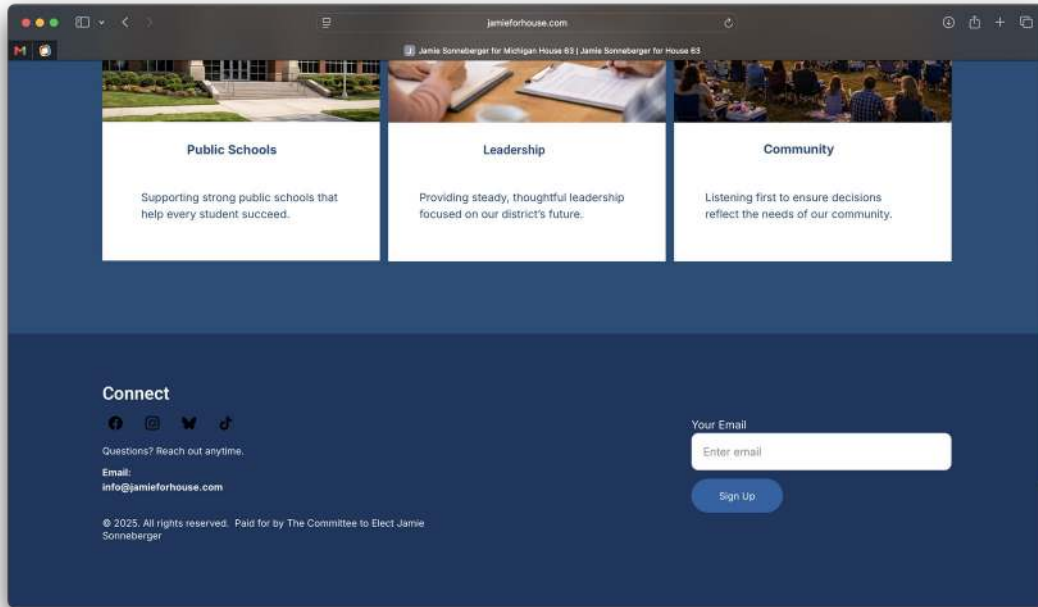
I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

Enclosures: Exhibit A (campaign website screenshot); Exhibit B (ActBlue donation page screenshots)

EXHIBIT A

Screenshot of the jamieforhouse.com campaign website, captured on or about August 31, 2026



Campaign website footer — committee name "Paid for by The Committee to Elect Jamie Sonneberger" appears with no accompanying address

EXHIBIT B

Screenshots of the secure.actblue.com donation page for Jamie Sonneberger, captured on or about August 31, 2026

Jamie Sonneberger for State House – District 63

Jamie Sonneberger is running for Michigan State House to bring steady leadership, strong public schools, and common-sense solutions to Lansing. Every contribution helps build a grassroots campaign focused on listening to our community and getting real work done.

Choose an amount:
Your contribution will benefit Jamie Sonneberger.

Make it monthly!
Your sustaining support allows us to create budgets and plan ahead!

Checkout
Have an ActBlue Express account? [Sign in to give faster.](#)

Pay with card
Apple Pay
Donate with Google Pay

Upper portion of donation page, showing campaign heading and solicitation text

Checkout
Have an ActBlue Express account? [Sign in to give faster.](#)

Pay with card
Apple Pay
Donate with Google Pay

Contribution rules

1. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person.
2. I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder).
3. I am at least eighteen years old.
4. This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution.

Americans living abroad may only contribute through ActBlue while physically in the United States. By proceeding with this transaction, you agree to ActBlue's [terms & conditions](#).

Platform paid for by ActBlue ([actblue.com](#)) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, [click here](#).

Lower portion of donation page, showing only ActBlue's generic platform disclaimer — no committee name or address appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Aidan Sova — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrikmi@gmail.com

2. Respondent Information

Candidate: Aidan Sova

Committee: Not identified by name in the material reviewed

Office Sought: Ann Arbor City Council, Ward 4

Campaign/Donation Page(s) Reviewed: <https://secure.actblue.com/donate/sova2026> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed a donation page hosted at <https://secure.actblue.com/donate/sova2026> soliciting contributions to Aidan Sova, a candidate for Ann Arbor City Council, Ward 4. The page displays the candidate's name and campaign logo ("AIDAN SOVA — DEMOCRAT FOR ANN ARBOR CITY COUNCIL, WARD 4") together with a solicitation letter stating "I'm running for Ann Arbor City Council in the Fourth Ward!" and signed "Yours truly, Aidan Sova." No "Paid for by" statement naming a campaign committee appears anywhere on the page, and no mailing address for any committee appears anywhere on the page. The page's campaign logo, "AIDAN SOVA — DEMOCRAT FOR ANN ARBOR CITY COUNCIL, WARD 4," together with the candidate's solicitation letter announcing that he is "running for Ann Arbor City Council," constitutes express advocacy for Sova's election within the meaning of *Golden v. Yahkind*, bringing the page within MCL 169.247's disclosure requirement. Its only funding-source disclosure is a footer notice stating that the platform itself is "paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee." No statement identifying a campaign committee for the candidate, by name or address, appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

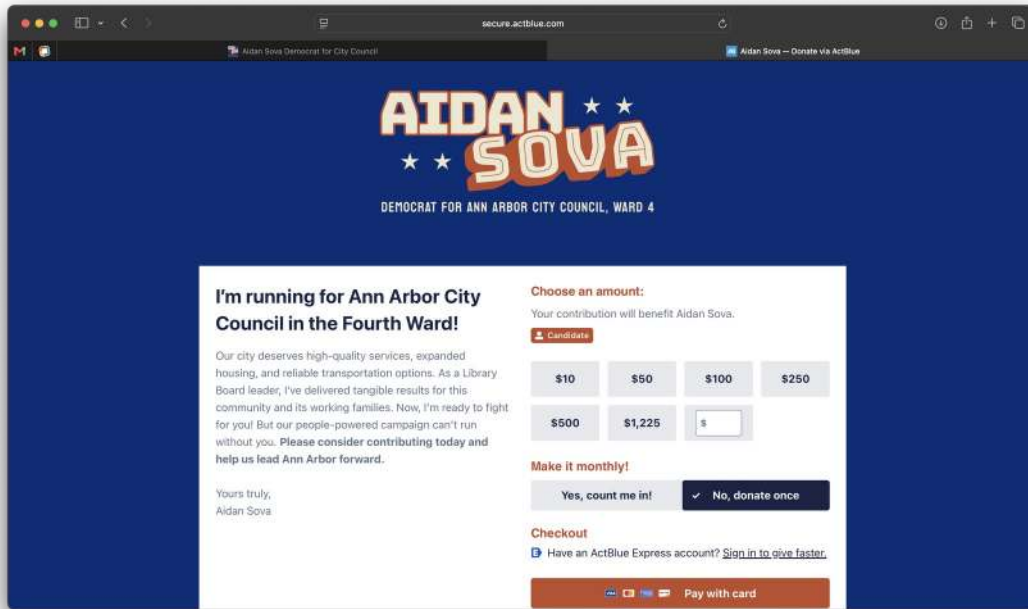
Printed Name: Vance Patrick

Date: August 31st, 2026

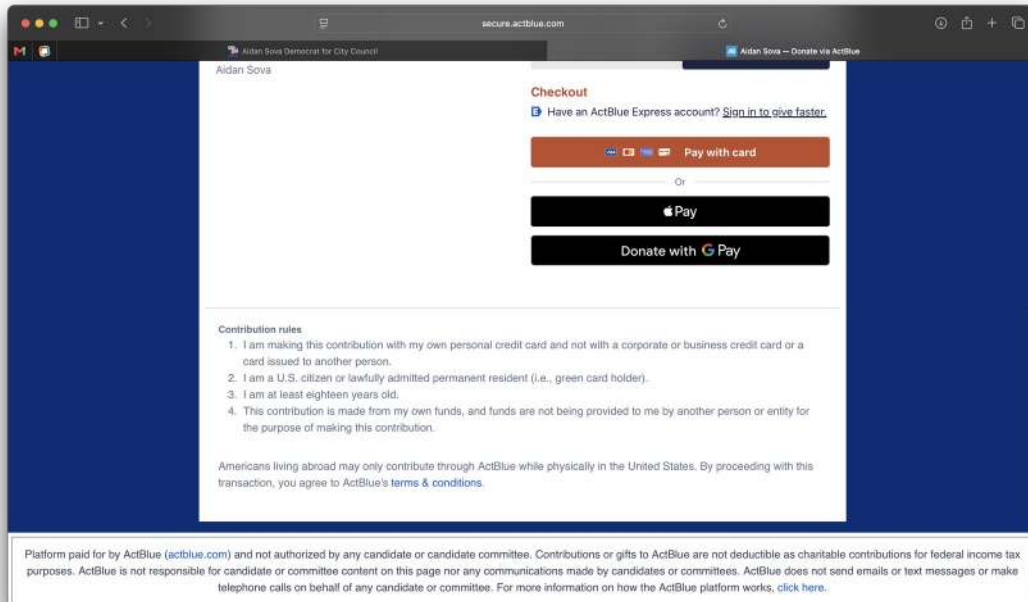
Enclosures: Exhibit A (donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Aidan Sova, captured on or about August 29, 2026



Upper portion of donation page — no committee or address disclosure



Lower portion of donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Tiffany Tilley — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Tiffany Tilley

Committee: Friends to Elect Tiffany Tilley

Office Sought: Michigan State Board of Education (seeking re-election)

Campaign/Donation Page(s) Reviewed: votetiffanytilley.com

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Friday, August 28, 2026, Complainant's designee accessed the website located at votetiffanytilley.com for Tiffany Tilley, a candidate seeking re-election to the Michigan State Board of Education. The footer of the page displays the text “Friends to Elect Tiffany Tilley” together with a mailing address, “P.O. Box 250212, West Bloomfield, MI 48325.” This text is presented as a bare identification block; the words “Paid for by,” or other language expressly identifying it as a funding-source disclosure, do not appear anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

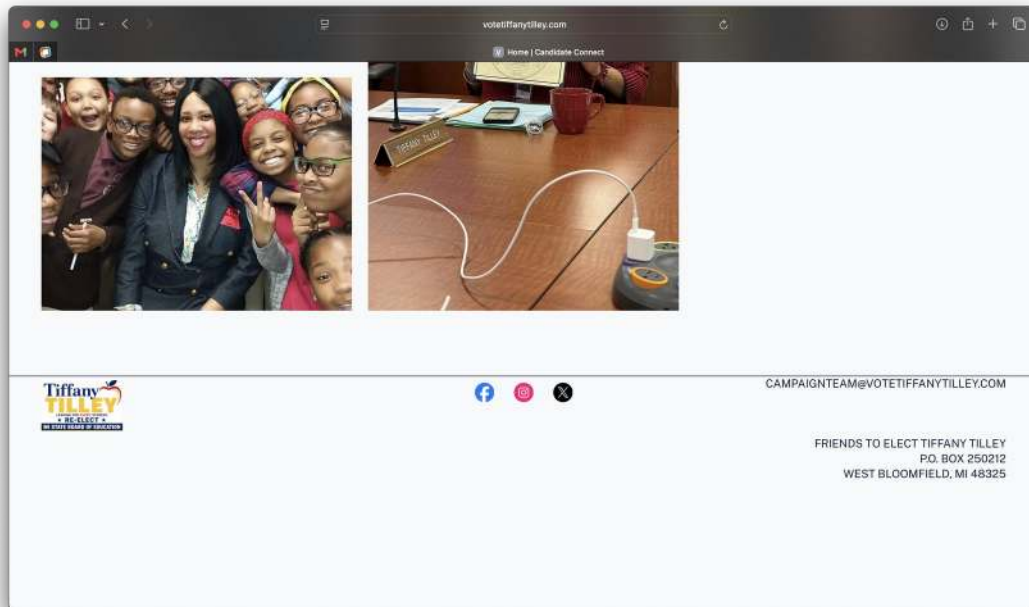
I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

Enclosures: Exhibit A (website screenshot)

EXHIBIT A

Screenshot of the votetiffanytilley.com footer, captured on or about August 28, 2026



Website footer — committee name and address shown, but no “Paid for by” language

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Joe Tollefson — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrikmi@gmail.com

2. Respondent Information

Candidate: Joe Tollefson

Committee: Not identified by name in the material reviewed

Office Sought: Plymouth-Canton Community Schools Board of Education, Board Member

Campaign/Donation Page(s) Reviewed: <https://secure.actblue.com/donate/joe-tollefson-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed a donation page hosted at <https://secure.actblue.com/donate/joe-tollefson-1> soliciting contributions to Joe Tollefson, a candidate for the Plymouth-Canton Community Schools Board of Education. The page displays a banner reading “Joe Tollefson — For P-CCS School Board” together with a solicitation stating “Support Joe Tollefson for P-CCS! Pitch in today to support Joe Tollefson for P-CCS. Together, we can be champions of public education.” No “Paid for by” statement naming a campaign committee appears anywhere on the page, and no mailing address for any committee appears anywhere on the page. The page's banner reading “Joe Tollefson — For P-CCS School Board,” together with its solicitation to “Support Joe Tollefson for P-CCS” and “Pitch in today,” constitutes express advocacy for Tollefson's election within the meaning of *Golden v. Yahkind*, bringing the page within MCL 169.247's disclosure requirement. Its only funding-source disclosure is a footer notice stating that the platform itself is “paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” No statement identifying a campaign committee for the candidate, by name or address, appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (donation page screenshots)

EXHIBIT A

Screenshots of the *secure.actblue.com* donation page for Joe Tollefson, captured on or about August 29, 2026

This screenshot shows the top half of a donation page. At the top, there's a header with the browser address bar showing 'secure.actblue.com' and a tab titled 'Joe Tollefson - Donate via ActBlue'. Below the header is a hero section featuring a circular portrait of Joe Tollefson on the left and a quote on the right: "I want to be your advocate at Plymouth-Canton schools!". The main heading is 'Support Joe Tollefson for P-CCS!' followed by a subtext: 'Pitch in today to support Joe Tollefson for P-CCS. Together, we can be champions of public education.' To the right, under 'Choose an amount:', there's a list of preset donation amounts: \$10, \$25, \$50, \$75, \$100, \$200, \$500, and a custom amount field. Below this is a 'Make it monthly!' section with a checkbox for recurring donations, which is currently unchecked, and two buttons: 'Yes, count me in!' and 'No, donate once'. At the bottom of this section is a 'Checkout' link.

Upper portion of donation page — no committee or address disclosure

This screenshot shows the bottom half of the donation page. It starts with a 'Checkout' section that includes a link to sign in for an ActBlue Express account. Below this are three payment options: 'Pay with card' (with a blue button), 'Or', and two black buttons for 'Apple Pay' and 'Donate with Google Pay'. Further down is a 'Contribution rules' section with four numbered points: 1. Personal credit card only, 2. U.S. citizen or permanent resident, 3. At least 18 years old, 4. Funds from own sources. Below the rules is a disclaimer for international users. At the very bottom is a small footer notice stating that the platform is paid for by ActBlue and is not authorized by the candidate, and that contributions are not tax-deductible.

Lower portion of donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Penelope Tsernoglou — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Penelope Tsernoglou

Committee: Friends of Penelope Tsernoglou

Office Sought: State Representative, District 75

Campaign/Donation Page(s) Reviewed: vote-penelope.com; <https://secure.actblue.com/donate/friends-of-penelope-tsernoglou-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee’s address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. ActBlue Donation Page (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the online donation page for Penelope Tsernoglou, candidate for State Representative, District 75, located at secure.actblue.com (linked from votepenelope.com; browser tab identified as "Penelope Tsernoglou — Donate via ActBlue"). The page is captioned "I'm in - let's win this!" and displays a campaign yard-sign-style graphic reading "Penelope TSERNOGLOU — DEMOCRAT FOR STATE REPRESENTATIVE," together with a photograph of the candidate greeting residents. The page solicits contributions through preset amount buttons (\$25–\$1,000), a custom-amount field, a "Make it monthly!" option, and "Pay with card," Apple Pay, and Google Pay checkout buttons.

Below the campaign photograph and above the checkout panel, the page states: "Thank you for your support! If you prefer to make a contribution by check, non-corporate checks may be mailed to: Friends of Penelope Tsernoglou, PO Box 4310, East Lansing, MI 48826." This passage does identify a committee name ("Friends of Penelope Tsernoglou") together with a street address, but it is framed exclusively as a mail-a-check instruction ("checks... may be mailed to"), not as a "Paid for by" statutory identification of the sponsoring committee for the page or the online contribution being solicited. No statement in the form "Paid for by [Committee], [Address]" appears anywhere on the page. The only other disclaimer-type language present is ActBlue's own generic platform notice at the bottom of the page ("Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee..."), which is the platform's boilerplate and not a disclosure by or on behalf of the Tsernoglou committee.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and

- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

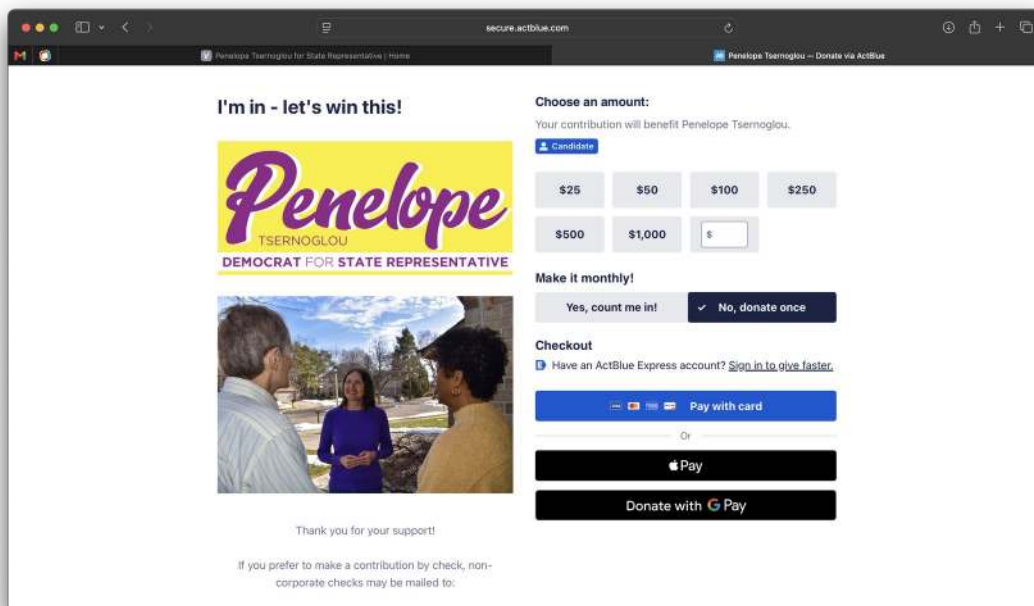
Printed Name: Vance Patrick

Date: August 31st, 2026

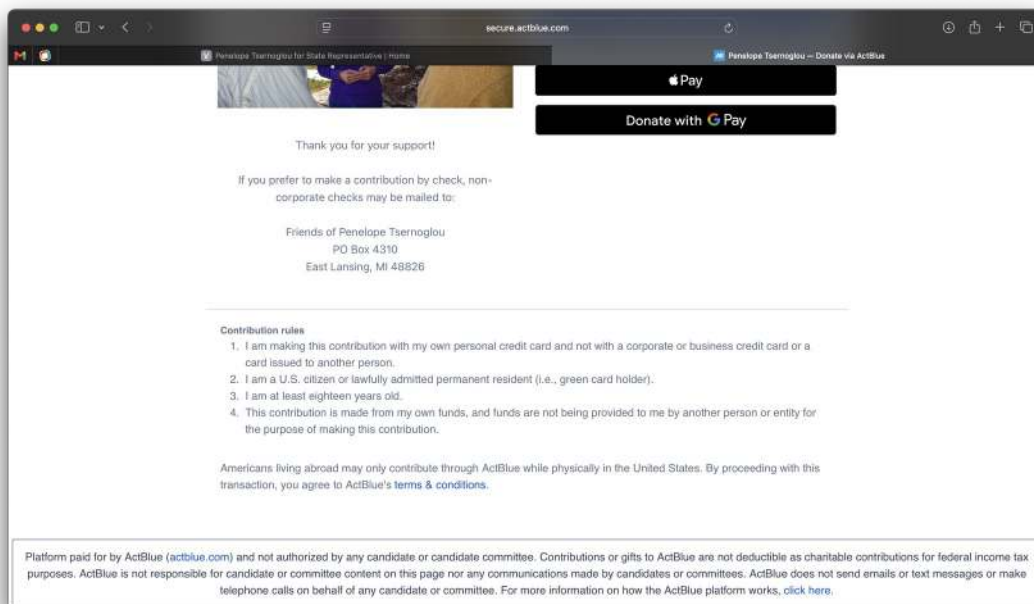
Enclosures: Exhibit A (ActBlue donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Penelope Tsernoglou, captured on or about August 31, 2026



Upper portion of donation page, showing campaign yard-sign graphic and heading "I'm in - let's win this!"



Lower portion of donation page, showing the "checks... may be mailed to" instruction naming the committee and address, followed by ActBlue's generic platform disclaimer — no unified "Paid for by" statement appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Thomas Turner — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Thomas Turner

Committee: Not identified by name in the material reviewed

Office Sought: State House District 57 (State Representative, District 57)

Campaign/Donation Page(s) Reviewed: <https://secure.actblue.com/donate/turner4mi> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Friday, August 28, 2026, Complainant's designee accessed a donation page hosted at <https://secure.actblue.com/donate/turner4mi> for Thomas Turner, identified as a candidate for Michigan State House District 57. The page displays a graphic identifying “Tom Turner” as a candidate for “State House District 57” together with solicitation text. This graphic identifying “Tom Turner” as a candidate for “State House District 57” together with accompanying solicitation text constitutes express advocacy for his election under *Golden v. Yahkind*, bringing the page within MCL 169.247's disclosure requirement. Its only funding-source disclosure is a footer notice stating that the platform itself is “paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” No statement identifying a campaign committee for the candidate, by name or address, appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

Enclosures: Exhibit A (donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Thomas Turner, captured on or about August 28, 2026

The screenshot shows the top half of a donation page in a web browser. The browser's address bar shows 'secure.actblue.com' and the page title is 'Thomas Turner - Donate via ActBlue'. A security notice 'Secured by ActBlue' is in the top right. The main content area features a photo of Tom Turner with a campaign sign that reads 'TOM TURNER FOR STATE HOUSE DISTRICT 17'. Below the photo, the heading 'Help send Tom to Lansing to fight for all of us!' is followed by a paragraph about the campaign. To the right, under 'Choose an amount:', there are buttons for \$20.26, \$50, \$100, \$250, \$500, \$1,225, and a custom amount field. Below this is a 'Make it monthly!' section with a checkbox and two buttons: 'Yes, count me in!' and 'No, donate once'. At the bottom, a 'Checkout' section is partially visible with a link to 'Have an ActBlue Express account? Sign in to give faster.'

Upper portion of donation page

The screenshot shows the bottom half of the donation page. The 'Checkout' section is prominent, featuring a link 'Have an ActBlue Express account? Sign in to give faster.' and three payment buttons: 'Pay with card', 'Apple Pay', and 'Donate with Google Pay'. Below the payment options, the 'Contribution rules' section lists four numbered items. Further down, a notice states that Americans living abroad may only contribute through ActBlue while physically in the United States. At the very bottom, a disclaimer states that the platform is paid for by ActBlue and is not authorized by any candidate or committee, and that contributions are not deductible for federal income tax purposes.

Lower portion of donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Walt Cook for TSD — Failure to Include Required Disclaimer/Identification Statement on Campaign Donation Page in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online donation page.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrikmi@gmail.com

2. Respondent Information

Candidate: Walter “Walt” Cook

Committee: WALT COOK FOR TSD

Office Sought: Member, Troy School District Board of Education

Committee/Candidate Contact: Not published on the donation page reviewed

Campaign Website: www.walt4tsd.com

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” The identification must be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On Friday, August 21, 2026, at approximately 4:10–4:11 PM Eastern, Complainant's designee accessed respondent's donation page at <https://secure.anedot.com/walt-cook-for-tsd/walt4tsd> using an iPhone 17 Pro Max and captured the screenshots attached as Exhibit A. The page is headed "Walt Cook for Troy School District" and displays a graphic captioned "TEA ENDORSEMENT ANNOUNCEMENT," stating that the Troy Education Association (an MEA-affiliated union) "PROUDLY SUPPORTS WALTER COOK, TSD BOARD OF EDUCATION," together with a photograph of Mr. Cook. Immediately below, the page states: "Thank you for your support! Your donation is essential for getting our message out through advertisements, literature, and yard signs," followed by a donation interface offering one-time and monthly giving, preset amounts of \$50, \$100, and \$200, an "Other" amount field, Apple Pay and Google Pay express checkout, and a donor-information and credit-card payment form ending in a "Donate" button.

The page's footer displays only the URL "<http://www.walt4tsd.com>"; the notice "© 2026 Walt Cook for TSD and Anedot Inc. All rights reserved"; a reference to the Terms of Service and Privacy Policy; and the logo of the payment processor, Anedot. No "Paid for by" disclaimer or other identification of the person or committee paying for the page appears anywhere on it — in the header, body text, donation-amount section, payment form, or footer, as required by MCL 169.247(1).

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's online donation page violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (donation page screenshots)

EXHIBIT A

Screenshots of the Walt Cook for TSD donation page (secure.anedot.com), captured on an iPhone 17 Pro Max on Friday, August 21, 2026 at approximately 4:10–4:11 PM Eastern; no disclaimer visible



Screenshot 1 of 4 — page header, candidate photograph, and express-advocacy solicitation text

4:10 5G

secure.anedot.com

\$50 \$100 \$200

Other

Express Checkout

Apple Pay Google Pay

OR

Email*

Email is required

☐ Send me updates by email (not needed for receipts)

Phone

☐ Send me updates by text*

* By providing your phone number, you are consenting to receive text message updates, including automated text messages, to that number from Walt Cook for TSD. Message & Data rates may apply, and message frequency may vary over time. Reply "STOP" to opt out of these text message updates.

First name* Last name*

First name is required Last name is required

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Screenshot 2 of 4 — donation-amount selection and contact-information fields

4:10 5G

secure.anedot.com

Address *

Address is required
This form only accepts US addresses.

Are you currently employed? *

☒ Yes ☐ No

Employer Name

Occupation

☒ Card ☐ Bank ☐ PayPal

Card Number *

Card number is required

Donate

Your information is secure.

By accessing this form you agree to the [Terms of](#)

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Screenshot 3 of 4 — address, employer/occupation, and card-payment fields

4:11 5G

secure.anedot.com

Occupation

Card Bank PayPal

Card Number*

Card number is required

Donate

Your information is secure.

By accessing this form you agree to the [Terms of Service](#) and [Privacy Policy](#).

<http://www.walt4tsd.com>

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Anedot

< > [Share] [Bookmarks] [Tabs]

Screenshot 4 of 4 — page footer; no disclaimer visible

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Jonathan Warshay — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Jonathan Warshay

Committee: Not identified by name in the material reviewed

Office Sought: West Bloomfield Township Supervisor

Campaign/Donation Page(s) Reviewed: hopp.bio (campaign hub page);
<https://secure.actblue.com/donate/jonathan-warshay-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Hub Page (Exhibit A)

On or about Friday, August 28, 2026, Complainant's designee accessed a campaign hub page hosted at hopp.bio for Jonathan Warshay, identified on the page as a candidate for West Bloomfield Township Supervisor. The page displays campaign branding, a campaign video, and links including one to donate via ActBlue. No “Paid for by” statement or other funding-source identification of any kind — no committee name, and no address — appears anywhere on the page. This campaign branding and video, together with the link inviting visitors to donate via ActBlue, constitute express advocacy for Jonathan Warshay's election under *Golden v. Yahkind*, bringing the page within MCL 169.247's disclosure requirement.

B. Linked Donation Page (Exhibit B)

Complainant's designee also accessed the linked donation page hosted at <https://secure.actblue.com/donate/jonathan-warshay-1> soliciting contributions to Jonathan Warshay. Its only funding-source disclosure is a footer notice stating that the platform itself is “paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” No statement identifying a campaign committee for the candidate, by name or address, appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

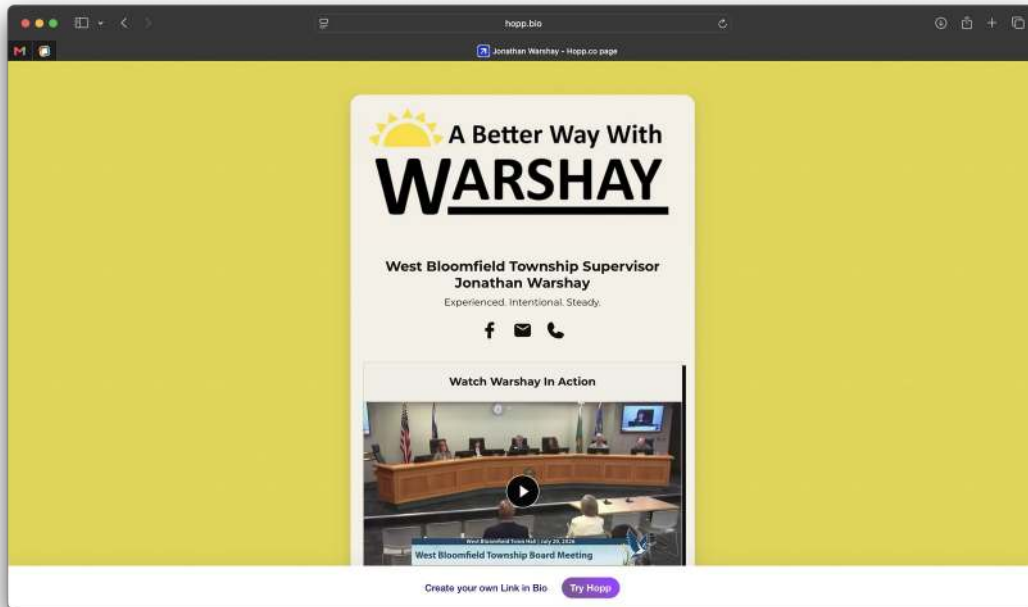
Printed Name: Vance Patrick

Date: August 31st, 2026

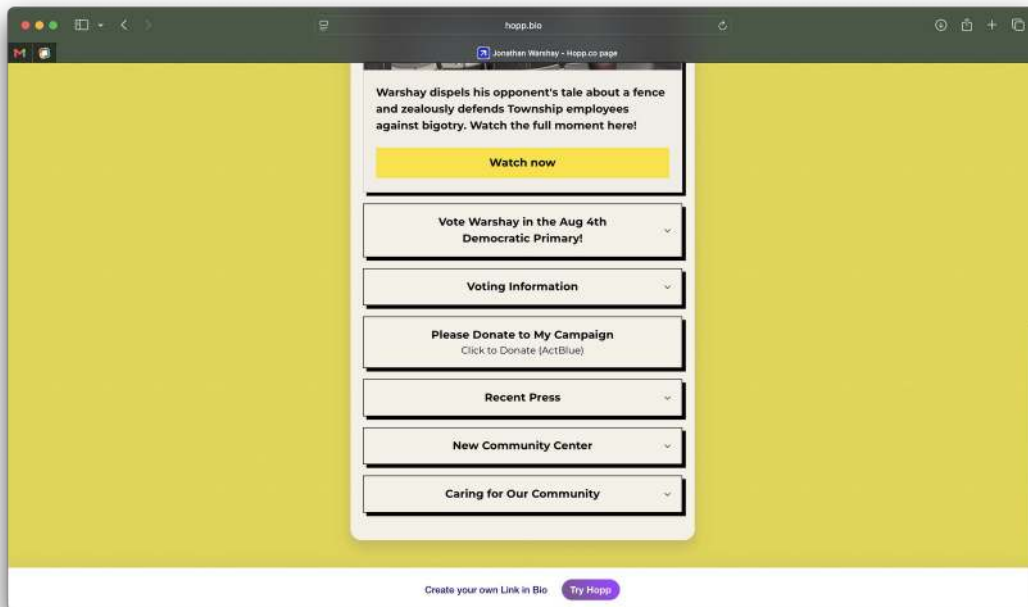
Enclosures: Exhibit A (campaign hub page screenshots); Exhibit B (donation page screenshots)

EXHIBIT A

Screenshots of the hopp.bio campaign hub page for Jonathan Warshay, captured on or about August 28, 2026



Campaign hub page — no disclaimer of any kind visible



Campaign hub page (continued) — no disclaimer of any kind visible

EXHIBIT B

Screenshots of the secure.actblue.com donation page for Jonathan Warshay, captured on or about August 28, 2026

This screenshot shows the top half of a donation page. On the left, under the heading "Donate to Jonathan Warshay!", there is a brief message: "Pitch in today to support Jonathan Warshay for Township Supervisor. Together, we can move our community forward." On the right, the "Choose an amount:" section offers a "Candidate" button and a grid of preset donation amounts: \$5, \$10, \$20, \$25, \$50, \$100, \$200, and a custom input field. Below this, the "Make it monthly!" section includes a text box explaining that sustaining support helps with budgeting, and two buttons: "Yes, count me in!" and "No, donate once" (which is selected). The "Checkout" section asks if the user has an ActBlue Express account (with a "Sign in to give faster" link) and provides three payment options: "Pay with card", "Apple Pay", and "Donate with Google Pay". A "Secured by ActBlue" badge is visible in the top right corner.

Upper portion of donation page

This screenshot shows the bottom half of the donation page. The "Checkout" section is repeated, showing the "Pay with card", "Apple Pay", and "Donate with Google Pay" options. Below the payment options, the "Contribution rules" are listed in four numbered points: 1. Contribution must be from personal credit, not corporate/business. 2. Contributor must be a U.S. citizen or lawful permanent resident. 3. Contributor must be at least 18 years old. 4. Contribution must be from the contributor's own funds. A note states that Americans living abroad may only contribute through ActBlue while in the United States. At the very bottom, a disclaimer states: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, click here."

Lower portion of donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Shannon Dare Wayne — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Shannon Dare Wayne

Committee: Not identified by name in the material reviewed

Office Sought: State Representative, District 31

Campaign/Donation Page(s) Reviewed: <https://secure.actblue.com/donate/shannon-wayne-1> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed a donation page hosted at <https://secure.actblue.com/donate/shannon-wayne-1> soliciting contributions to Shannon Dare Wayne, a candidate for State Representative, District 31. The page displays the candidate's name and campaign logo (“SHANNON DARE WAYNE — FOR STATE REPRESENTATIVE”) together with a biographical solicitation. No “Paid for by” statement naming a campaign committee appears anywhere on the page, and no mailing address for any committee appears anywhere on the page. The page's campaign logo, “SHANNON DARE WAYNE — FOR STATE REPRESENTATIVE,” combining the candidate's name with the office sought, together with its accompanying biographical solicitation, constitutes express advocacy for Wayne's election within the meaning of *Golden v. Yahkind*, bringing the page within MCL 169.247's disclosure requirement. Its only funding-source disclosure is a footer notice stating that the platform itself is “paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” No statement identifying a campaign committee for the candidate, by name or address, appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Shannon Dare Wayne, captured on or about August 29, 2026

The screenshot shows the top half of a donation page in a web browser. The browser's address bar shows 'secure.actblue.com' and the page title is 'Shannon Wayne - Donate via ActBlue'. A 'Secured by ActBlue' badge is in the top right. The main heading is 'Shannon Dare WAYNE' in large blue letters, with '★ FOR STATE REPRESENTATIVE ★' below it. On the left, under 'Donate to Shannon Wayne!', there is a paragraph about Shannon Dare Wayne, a lifelong Michigander who has served on the Milan City Council and at Ford Motor Company. Below this is a call to action: 'Pitch in today to support Shannon Wayne for Shannon Dare Wayne for State Representative for District 31. Together, we can move our community forward.' On the right, under 'Choose an amount:', there is a note that the contribution will benefit Shannon Wayne. Below this are buttons for '\$100', '\$250', '\$500', and '\$1,225', along with a custom amount input field. A 'Make it monthly!' section offers a checkbox for 'Yes, count me in!' (checked) and a button for 'No, donate once'. At the bottom right, a 'Checkout' section has a link to 'Have an ActBlue Express account? Sign in to give faster.'.

Upper portion of donation page — no committee or address disclosure

The screenshot shows the bottom half of the donation page. On the left is a photo of Shannon Dare Wayne, a woman with dark hair wearing a red blazer over a white polka-dot top, with her arms crossed. To the right of the photo is a 'Donate with G Pay' button. Below the photo, under 'Contribution rules', there is a list of four rules: 1. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person. 2. I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder). 3. I am at least eighteen years old. 4. This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution. Below the rules, a note states: 'Americans living abroad may only contribute through ActBlue while physically in the United States. By proceeding with this transaction, you agree to ActBlue's terms & conditions.' At the very bottom, a small disclaimer reads: 'Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, click here.'

Lower portion of donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Dylan Wegela — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Dylan Wegela

Committee: People for Dylan Wegela

Office Sought: State Representative, District 26

Campaign/Donation Page(s) Reviewed: <https://secure.actblue.com/donate/dw-website> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed a donation page hosted at <https://secure.actblue.com/donate/dw-website> soliciting contributions to Dylan Wegela, a candidate for State Representative, District 26. The page displays a banner reading “RE-ELECT DYLAN WEGELA — STATE REPRESENTATIVE.” Further down the page, in a paragraph describing contribution limits, the page states: “The Michigan Campaign Finance Act limits individual contributions to \$1,225 per cycle. People for Dylan Wegela neither solicits nor accepts contributions from corporate or business association PACs.” This is the only place the name of a committee (“People for Dylan Wegela”) appears anywhere on the page; the name is not preceded or followed by the words “Paid for by,” and no mailing address for the committee — or for the candidate — appears anywhere on the page. The only additional funding-source disclosure on the page is a footer notice stating that the platform itself is “Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” The page's banner, “RE-ELECT DYLAN WEGELA — STATE REPRESENTATIVE,” is precisely the kind of campaign branding that combines the candidate's name with the office sought and constitutes express advocacy for Wegela's re-election within the meaning of *Golden v. Yahkind*, bringing the page within MCL 169.247's disclosure requirement.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

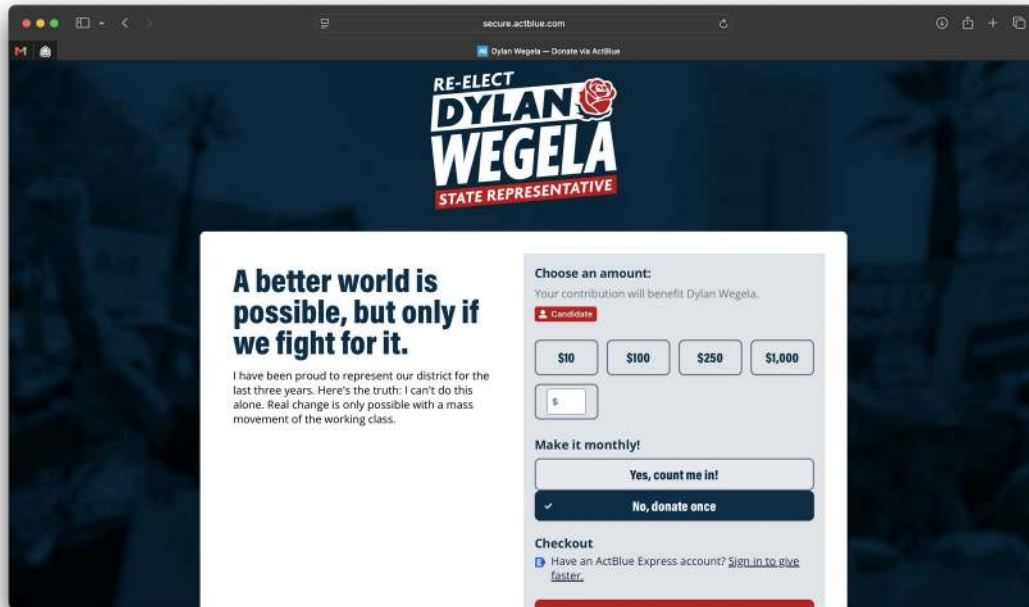
Printed Name: Vance Patrick

Date: August 31st, 2026

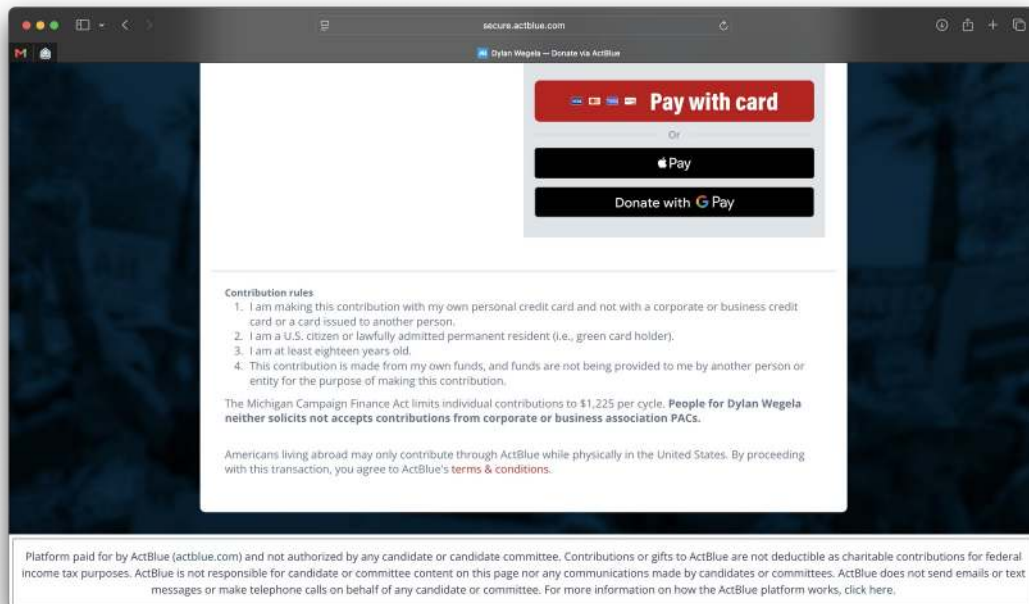
Enclosures: Exhibit A (donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Dylan Wegela, captured on or about August 29, 2026



Upper portion of donation page — committee is not named here and no address appears



Lower portion of donation page — committee named in passing, with no “Paid for by” language and no address; only ActBlue’s generic platform notice follows

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Joanna Whaley — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrikmi@gmail.com

2. Respondent Information

Candidate: Joanna Whaley

Committee: Committee to Elect Joanna Whaley

Office Sought: State Representative, District 2

Campaign/Donation Page(s) Reviewed: joannawhaley.com;
<https://secure.actblue.com/donate/joannawhaley> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed the website located at joannawhaley.com for Joanna Whaley, a candidate for State Representative, District 2. The footer of the page is divided into two columns. The left-hand column states “Copyright (C) 2025 Committee to Elect Joanna Whaley” immediately above a separate line stating “Paid for by the Committee to Elect Joanna Whaley.” The right-hand column of the same footer, positioned separately, lists general contact information — an email address and phone number — followed by a mailing address, “P.O. Box 113, Allen Park, MI 48101.” The mailing address does not appear together with, or adjacent to, the “Paid for by” statement; it instead appears as part of a separate contact-information block presented alongside the campaign's email address and phone number, with no “Paid for by” language of its own. No single, unified statement on the page combines the committee's “Paid for by” language with a mailing address.

B. Linked Donation Page (Exhibit B)

Complainant's designee also accessed a linked donation page hosted at <https://secure.actblue.com/donate/joannawhaley> soliciting contributions to Joanna Whaley. The page displays the campaign logo (“JOANNA WHALEY — FOR STATE REPRESENTATIVE”) and a solicitation stating “Donate to Joanna Whaley! Pitch in today to support Joanna Whaley for the Michigan House of Representatives - District 2.” No “Paid for by” statement naming a campaign committee appears anywhere on the page, and no mailing address for any committee appears anywhere on the page. The page's campaign logo, “JOANNA WHALEY — FOR STATE REPRESENTATIVE,” together with its solicitation to “Donate to Joanna Whaley! Pitch in today to support Joanna Whaley for the Michigan House of Representatives - District 2,” constitutes express advocacy for Whaley's election within the meaning of *Golden v. Yahkind*, bringing the page within MCL 169.247's disclosure requirement. Its only funding-source disclosure is a footer notice stating that the platform itself is “paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” No statement identifying a campaign committee for the candidate, by name or address, appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (website screenshot); Exhibit B (donation page screenshots)

EXHIBIT A

Screenshot of the joannawhaley.com footer, captured on or about August 29, 2026

The screenshot shows a web browser window with the URL joannawhaley.com. The page features a contact form with the following elements:

- A text input field at the top.
- A radio button labeled "Sign up for news and updates".
- A label "Subject (required)" followed by a text input field.
- A label "Message (required)" followed by a larger text input field.
- A black "Submit" button.

The footer is a dark horizontal bar containing the following information:

- Left column:**
 - Copyright (C) 2025 Committee to Elect Joanna Whaley
 - Paid for by the Committee to Elect Joanna Whaley
 - Made in House
- Center:** A gold seal with the text "COMMITTEE TO ELECT JOANNA WHALEY" and "2025".
- Right column:**
 - admin@joannawhaley.com
 - (313) 444-2168
 - P.O. Box 113
 - Allen Park, MI 48101
- Bottom right:** Social media icons for TikTok, Facebook, and Instagram.

Website footer — “Paid for by” statement (left column) is separated from the mailing address, which appears with contact info (right column)

EXHIBIT B

Screenshots of the secure.actblue.com donation page for Joanna Whaley, captured on or about August 29, 2026

The screenshot shows the top half of a donation page for Joanna Whaley. At the top, the browser address bar shows 'secure.actblue.com'. The page header includes 'Joanna Whaley for State Representative' and 'Joanna Whaley — Donate via ActBlue'. A security notice 'Secured by ActBlue' is in the top right. The main heading is 'JOANNA WHALEY FOR STATE REPRESENTATIVE'. Below this, the text 'Donate to Joanna Whaley!' is followed by a paragraph: 'Pitch in today to support Joanna Whaley for the Michigan House of Representatives - District 2. Together, we can move our community forward.' To the right, under 'Choose an amount:', it says 'Your contribution will benefit Joanna Whaley.' and 'Candidate'. There are buttons for \$10, \$25, \$50, \$100, \$250, \$500, \$1,225, and a custom amount field. Below that, 'Make it monthly!' is followed by a paragraph: 'Your sustaining support allows us to create budgets and plan ahead!'. There are two buttons: 'Yes, count me in!' and 'No, donate once' (which is selected). At the bottom, the 'Checkout' section is partially visible.

Upper portion of donation page — no committee or address disclosure

The screenshot shows the bottom half of the donation page. The 'Checkout' section is prominent, with a link 'Have an ActBlue Express account? Sign in to give faster.' Below this are three payment options: 'Pay with card', 'Apple Pay', and 'Donate with Google Pay'. Below the payment options, the 'Contribution rules' section lists four rules: 1. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person. 2. I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder). 3. I am at least eighteen years old. 4. This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution. Below the rules, a paragraph states: 'Americans living abroad may only contribute through ActBlue while physically in the United States. By proceeding with this transaction, you agree to ActBlue's terms & conditions.' At the very bottom, a disclaimer reads: 'Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, click here.'

Lower portion of donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Don Wilkerson — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Don Wilkerson

Committee: Committee to Elect Don Wilkerson

Office Sought: Ann Arbor Public Schools Board of Education, Board Member

Campaign/Donation Page(s) Reviewed: votedonwilkerson.com

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed the website located at votedonwilkerson.com for Don Wilkerson, a candidate for the Ann Arbor Public Schools Board of Education. The footer of the page states, in full, “© 2026 Paid for by the Committee to Elect Don Wilkerson,” alongside social-media icons. No mailing address for the committee — street address or PO box — appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

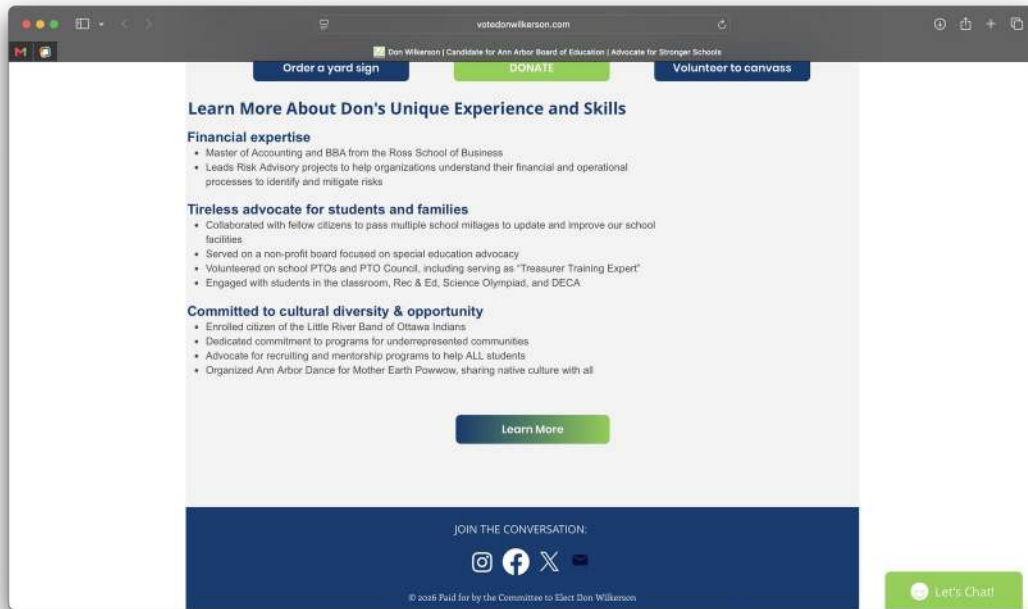
I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

Enclosures: Exhibit A (website screenshot)

EXHIBIT A

Screenshot of the votedonwilkerson.com footer, captured on or about August 29, 2026



Website footer — committee named with “Paid for by” language but no address given

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Jimmie Wilson Jr. — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Jimmie Wilson Jr.

Committee: Not identified by name in the material reviewed

Office Sought: State Representative, District 32

Campaign/Donation Page(s) Reviewed: <https://secure.actblue.com/donate/jimmiewilsonjr> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Donation Page (Exhibit A)

On or about Saturday, August 29, 2026, Complainant's designee accessed a donation page hosted at <https://secure.actblue.com/donate/jimmiewilsonjr> soliciting contributions to Jimmie Wilson Jr., a candidate for State Representative, District 32. The page displays the candidate's name and campaign logo ("JIMMIE WILSON JR. — DEMOCRAT FOR STATE REPRESENTATIVE") together with a solicitation stating "Support Jimmie and fight for Ypsilanti with a contribution today!" No "Paid for by" statement naming a campaign committee appears anywhere on the page, and no mailing address for any committee appears anywhere on the page. The page's campaign logo, "JIMMIE WILSON JR. — DEMOCRAT FOR STATE REPRESENTATIVE," together with its call to "Support Jimmie and fight for Ypsilanti with a contribution today," constitutes express advocacy for Wilson's election within the meaning of *Golden v. Yahkind*, bringing the page within MCL 169.247's disclosure requirement. Its only funding-source disclosure is a footer notice stating that the platform itself is "paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee." No statement identifying a campaign committee for the candidate, by name or address, appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

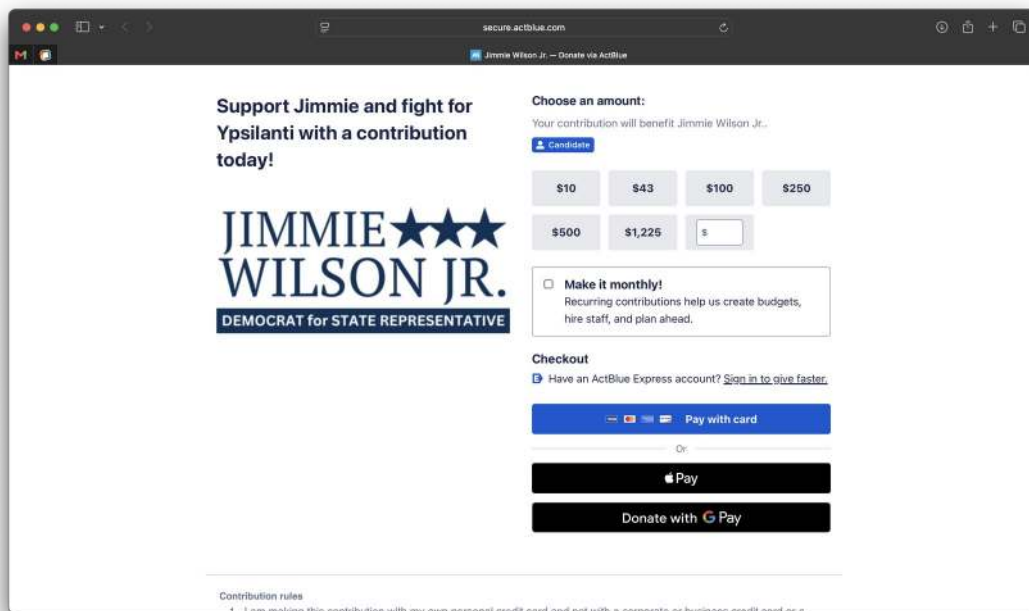
Printed Name: Vance Patrick

Date: August 31st, 2026

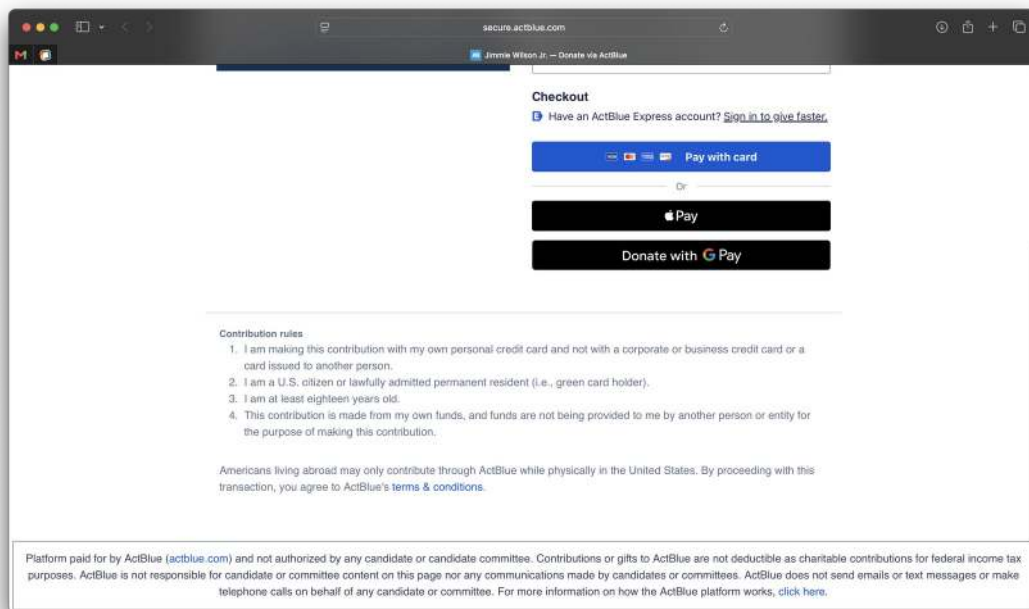
Enclosures: Exhibit A (donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Jimmie Wilson Jr., captured on or about August 29, 2026



Upper portion of donation page — no committee or address disclosure



Lower portion of donation page — only ActBlue's generic platform notice appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Angela Witwer — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrikmi@gmail.com

2. Respondent Information

Candidate: Angela Witwer

Committee: Angela Witwer For State Representative

Office Sought: State Representative, District 76

Campaign/Donation Page(s) Reviewed: voteforangela.com;
<https://secure.actblue.com/donate/angelawitwer> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the campaign website located at voteforangela.com for Angela Witwer, candidate for State Representative, District 76 (browser tab: "Home - Angela Witwer"). The site header displays a logo reading "Re-elect Angela Witwer STATE REPRESENTATIVE" beside navigation links including "Get Involved" and a red pill-shaped "Donate" button; the main navigation bar likewise includes a red "Donate" call-to-action button. A blue banner mid-page states "Get Updates — Join the newsletter to get updates on Angela's campaign," with an email-signup field and "Sign up" button.

The dark footer below repeats the "Re-elect Angela Witwer STATE REPRESENTATIVE" logo alongside a contact block reading "PO Box 80221, Lansing, MI 48908," "Info@VoteforAngela.com," "Contact Us | Donate," and "© 2020 Angela Witwer. All Rights Reserved." Separately below that contact block, set off in its own distinct bordered rectangle with different formatting, the page states: "Paid for by: Angela Witwer For State Representative." No address appears inside that bordered "Paid for by" box, and the address "PO Box 80221, Lansing, MI 48908" that does appear on the page is located in the separate contact block above it, in different formatting, without any "Paid for by" language attached to it. The committee name and the address therefore do not appear together as a single, unified statutory disclosure; a viewer must connect two visually and textually separate elements of the footer to assemble the required "Paid for by [Committee], [Address]" statement.

B. ActBlue Donation Page (Exhibit B)

On or about Monday, August 31, 2026, Complainant's designee accessed the associated online donation page at secure.actblue.com (browser tab: "Angela Witwer — Donate via ActBlue"), reached via the site's "Donate" button. The page displays a large banner logo reading "Angela WITWER for STATE REPRESENTATIVE" set against a Michigan Capitol dome background image, beneath which the page is captioned "Contribute to Angela Witwer for State Representative" and repeats the same "Angela WITWER for STATE REPRESENTATIVE" logo graphic. Accompanying text states: "Please know that

your donation will help reelect a leader and continue to build a stronger community with open communication." The page solicits contributions through amount buttons, a custom-amount field, and "Pay with card," Apple Pay, and Google Pay checkout buttons.

No committee name or address of any kind appears anywhere on the ActBlue donation page. The only disclaimer-type language present is ActBlue's own generic platform notice at the bottom of the page ("Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee..."), which does not identify or disclose the Witwer committee.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

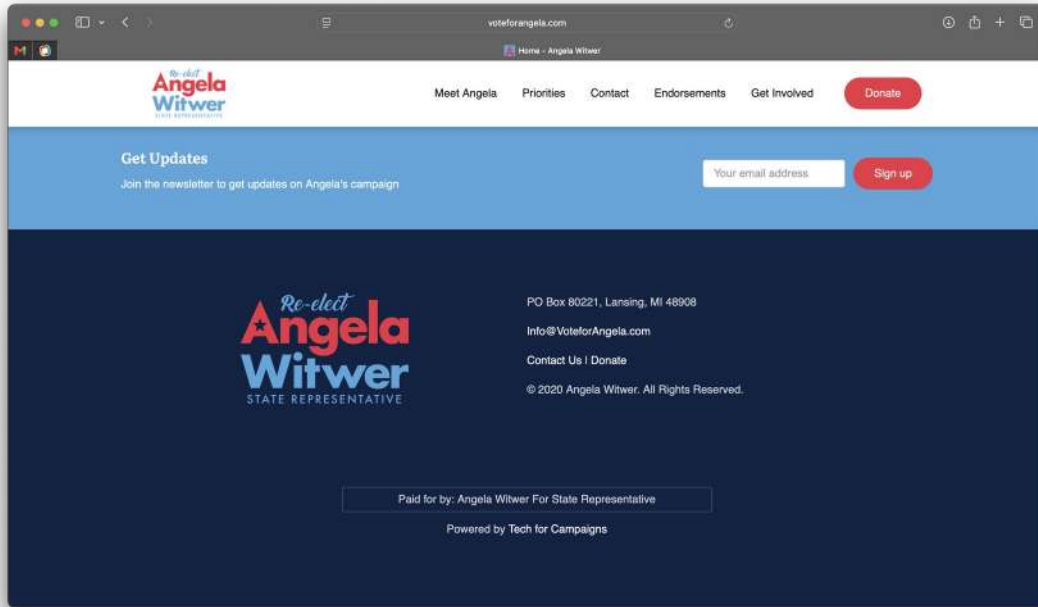
I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

Enclosures: Exhibit A (campaign website screenshot); Exhibit B (ActBlue donation page screenshots)

EXHIBIT A

Screenshot of the voteforangela.com campaign website footer, captured on or about August 31, 2026



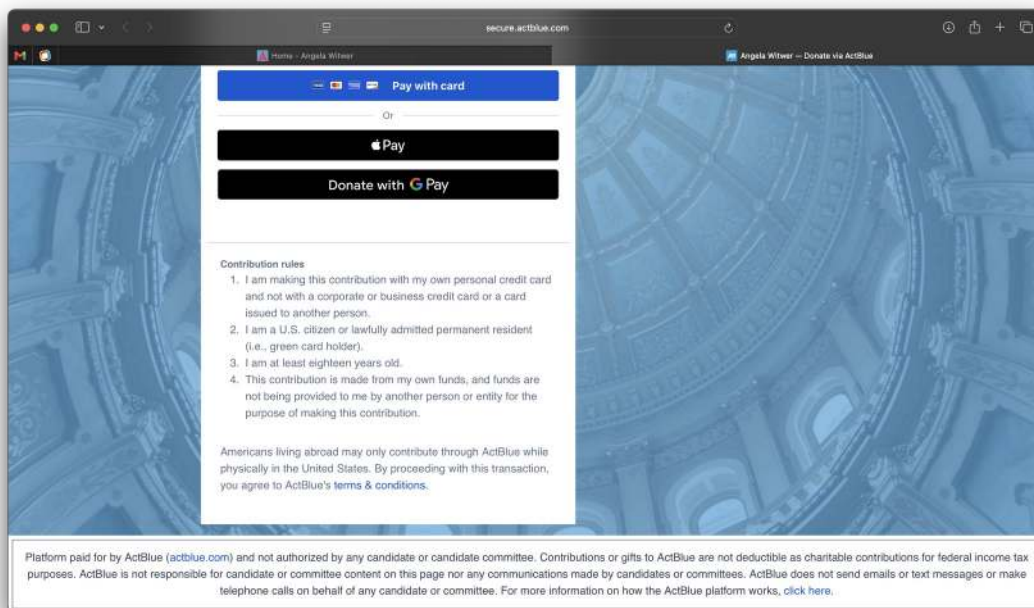
Campaign website footer — committee name "Paid for by: Angela Witwer For State Representative" appears in a separately bordered box, apart from and without the "PO Box 80221, Lansing, MI 48908" address shown elsewhere in the footer's contact block

EXHIBIT B

Screenshots of the secure.actblue.com donation page for Angela Witwer, captured on or about August 31, 2026



Upper portion of donation page, showing "Angela WITWER for STATE REPRESENTATIVE" banner and campaign logo



Lower portion of donation page, showing only ActBlue's generic platform disclaimer — no committee name or address appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Stephen Wooden — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Stephen Wooden

Committee: Not identified by name in the material reviewed

Office Sought: State Representative, District 81

Campaign/Donation Page(s) Reviewed: stephenwooden.com;
<https://secure.actblue.com/donate/woodenformi> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. ActBlue Donation Page (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the online donation page for Stephen Wooden, candidate for State Representative, District 81, located at secure.actblue.com (linked from stephenwooden.com; browser tab identified as "Stephen Wooden — Donate via ActBlue"). The page displays a large banner graphic reading "STEPHEN for STATE HOUSE / WOODEN" beside a campaign photograph of the candidate, and is captioned "Stephen Wooden for State House." Accompanying text states: "Stephen is a proven leader who's delivered results for West Michigan. With your contribution, we can send Stephen to the State House so he can help protect the progress we've made and build on it." The page solicits contributions through preset amount buttons (\$25–\$1,225), a custom-amount field, a "Make it monthly!" option, and "Pay with card," Apple Pay, and Google Pay checkout buttons.

No committee name or address for the Wooden campaign appears anywhere on the page reviewed, in either the upper portion (Exhibit A, image 1) or the lower portion showing the full "Contribution rules" and footer (Exhibit A, image 2). The only disclaimer-type language present on the page is ActBlue's own generic platform notice at the bottom: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee..." — again, the platform's own boilerplate, not a disclosure identifying the Wooden committee by name or address.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

Printed Name: Vance Patrick

Date: August 31st, 2026

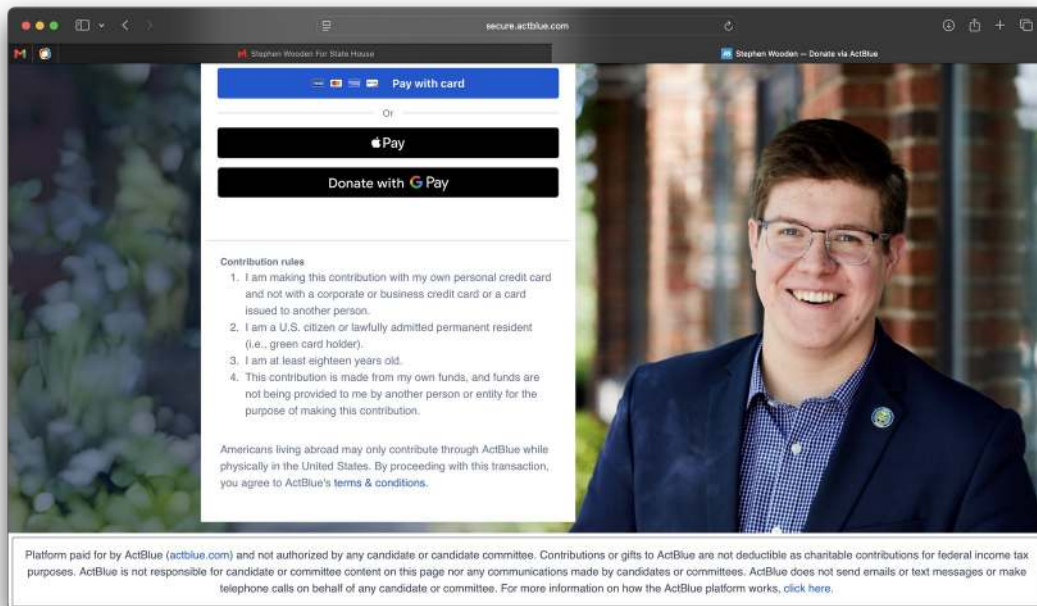
Enclosures: Exhibit A (ActBlue donation page screenshots)

EXHIBIT A

Screenshots of the secure.actblue.com donation page for Stephen Wooden, captured on or about August 31, 2026



Upper portion of donation page, showing "STEPHEN for STATE HOUSE / WOODEN" banner graphic and candidate photograph



Lower portion of donation page, showing checkout options and ActBlue's generic platform disclaimer at bottom — no committee name or address appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Mark W. Yonkman — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpattickmi@gmail.com

2. Respondent Information

Candidate: Mark W. Yonkman

Committee: Mark Yonkman for State Senate

Office Sought: State Senate, District 36

Campaign/Donation Page(s) Reviewed: yonkmanforsenate.org; <https://secure.actblue.com/donate/mark-yonkman-1> (ActBlue donation page); <https://www.clover.com/pay-widgets/b90395ba-a867-478b-8aaf-db6d87790101> (Clover donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee’s address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible,

and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the campaign website located at yonkmanforsenate.org for Mark W. Yonkman, candidate for State Senate, District 36 (browser tab: "Home | MarkYonkman"). The header displays a logo combining a Michigan-shaped graphic with the text "MARK YONKMAN for State Senate," beside navigation links ("Meet Mark," "Priorities," "News & Events," "Articles by Mark") and two red call-to-action buttons reading "DONATE" and "GET INVOLVED." A gray content block below states, in italicized and bold lettering: "Checks can be mailed and made out to: Mark Yonkman for State Senate, P.O. Box 23, Boon, MI 49618," followed by "Election Law requires that we collect certain information from you. Please fill out the short form here and send it in with your donation when paying by check," and the bolded, letter-spaced call to action: "Will you stand with Mark and make a donation today?"

The footer repeats the "Mark Yonkman - for State Senate -" wordmark next to a separate contact block reading "P.O. Box 23, Boon, MI 49618," "Mark@MarkYonkman.com," and "989-269-5599," followed by "Terms & Conditions | Privacy Policy | Accessibility Statement" and "© 2026 Mark Yonkman for Senate." At no point on the page reviewed does the phrase "Paid for by" appear. The committee name "Mark Yonkman for State Senate" and the address "P.O. Box 23, Boon, MI 49618" each appear twice on the page — once as a check-mailing instruction and once as general contact information in the footer — but never framed as, or combined into, a statutory "Paid for by [Committee], [Address]" disclosure.

B. ActBlue Donation Page (Exhibit B)

On or about Monday, August 31, 2026, Complainant's designee accessed the associated online donation page at secure.actblue.com (browser tab: "Mark Yonkman — Donate via ActBlue"). The page displays a text wordmark reading "Mark Yonkman for State Senate" and is captioned "Donate to Mark Yonkman for State Senate," beside a portrait photograph of the candidate. Accompanying biographical and campaign

text states, among other things, that "Mark is focused on strengthening farming and small business in Michigan... The goal is to make Michigan as strong and resilient as possible in order to face the many challenges that are coming our way." The page solicits contributions through preset amount buttons (\$10–\$2,450), a custom-amount field, a "Make it monthly!" option, and "Pay with card," Apple Pay, and Google Pay checkout buttons.

No committee name or address appears anywhere on the ActBlue donation page. The only disclaimer-type language present is ActBlue's own generic platform notice at the bottom of the page ("Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee..."), which does not disclose the Yonkman committee's identity or address.

C. Clover Donation Page (Exhibit C)

On or about Monday, August 31, 2026, Complainant's designee accessed a linked donation page hosted at clover.com (browser tab: "Checkout | Clover"), reached via a donation link associated with the Yonkman campaign. The page displays a green banner captioned "MARK YONKMAN FOR STATE SENATE" and, on the payment screen, "MARK YONKMAN FOR STATE SENATE — Total \$10.00," together with a checkout form collecting the donor's name, email, and business name, and payment-method options (credit/debit card, Apple Pay, Google Pay, Paze, Samsung Pay) beneath a "Pay \$10.00" button.

No "Paid for by" statement, committee address, or any statutory disclosure appears anywhere on either portion of the Clover checkout page reviewed — only the candidate-branded banner "MARK YONKMAN FOR STATE SENATE" identifies the beneficiary of the payment. The only footer text present is "Terms • Privacy Policy" and "Other trademarks are the property of their respective owners" — generic Clover platform links, not even a boilerplate platform disclaimer comparable to ActBlue's, and certainly not a disclosure of the Yonkman committee's name and address.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

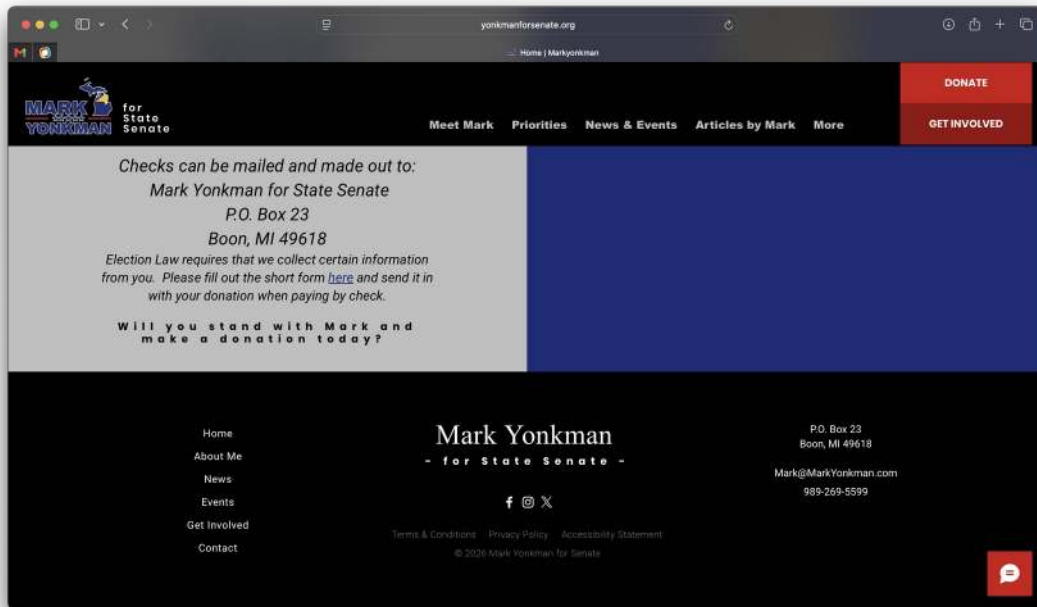
I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick
Printed Name: Vance Patrick
Date: August 31st, 2026

Enclosures: Exhibit A (campaign website screenshot); Exhibit B (ActBlue donation page screenshots); Exhibit C (Clover donation page screenshots)

EXHIBIT A

Screenshot of the yonkmanforsenate.org campaign website, captured on or about August 31, 2026



Campaign website — committee name and address appear only as a check-mailing instruction and separately as footer contact information; no "Paid for by" statement appears anywhere on the page

EXHIBIT B

Screenshots of the secure.actblue.com donation page for Mark Yonkman, captured on or about August 31, 2026

The screenshot shows the top half of a donation page. On the left, there is a campaign wordmark "MARK YONKMAN FOR STATE SENATE" and a heading "Donate to Mark Yonkman for State Senate". Below this is a portrait of Mark Yonkman. To the right of the portrait is a short biography: "Mark was raised on a family farm in Wexford County Michigan. After a career in law and banking, Mark returned to the family farm in 2018 when his parents passed away. Observing first hand how rural voters have become ignored by the political elites, Mark wrote a book: 'Reclaim the Rural Vote' to help Democrats." On the right side of the page, there is a "Choose an amount:" section with a "Candidates" label and a note "Your contribution will benefit Mark Yonkman." Below this are buttons for \$10, \$50, \$100, \$250, \$500, \$1,000, \$2,450, and a custom amount field. A "Make it monthly!" section has two options: "Yes, count me in!" and "No, donate once" (which is selected). A "Checkout" section asks if the user has an ActBlue Express account and provides a link to sign in. At the bottom of this section are three payment options: "Pay with card", "Apple Pay", and "Donate with Google Pay".

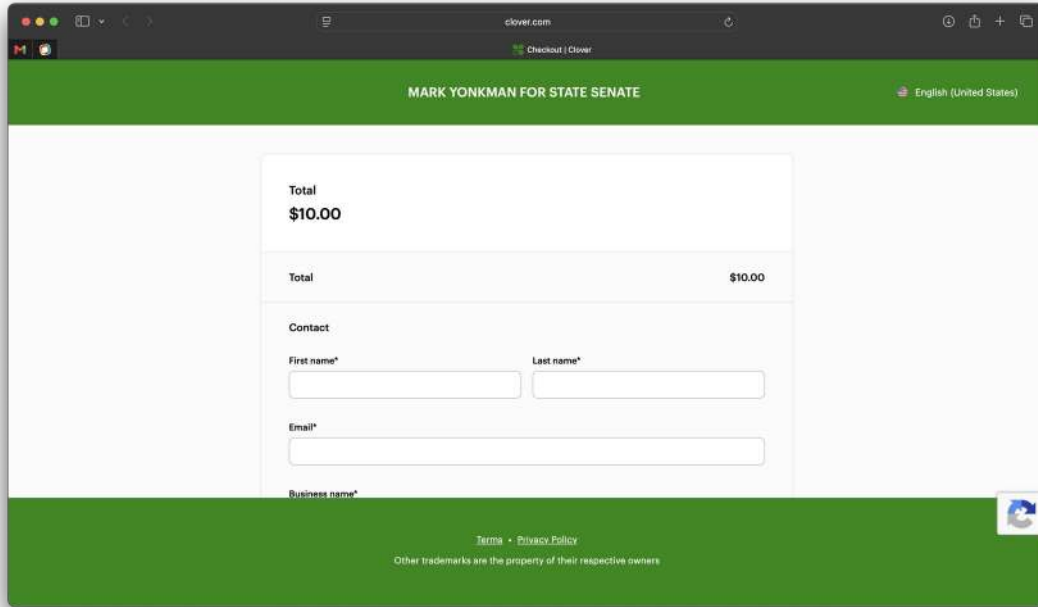
Upper portion of donation page, showing campaign wordmark and candidate photograph

The screenshot shows the bottom half of the donation page. It begins with a paragraph about Mark's focus: "Mark is focused on strengthening farming and small business in Michigan, as well as ensuring that Michigan's young people obtain the skills needed to take advantage of the many jobs that are available in Michigan. He also brings expertise to the multiple facets of the housing crisis that Michiganders are experiencing. He wants to ensure that Michigan has all of the energy it needs from all available sources to fuel the economy of the future. The goal is to make Michigan as strong and resilient as possible in order to face the many challenges that are coming our way." Below this is a section titled "Contribution rules" with four numbered points: 1. "I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person.", 2. "I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder).", 3. "This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution.", 4. "I am at least eighteen years old." Below the rules is a note: "Americans living abroad may only contribute through ActBlue while physically in the United States. By proceeding with this transaction, you agree to ActBlue's [terms & conditions](#)." At the very bottom, a small disclaimer states: "Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, [click here](#)."

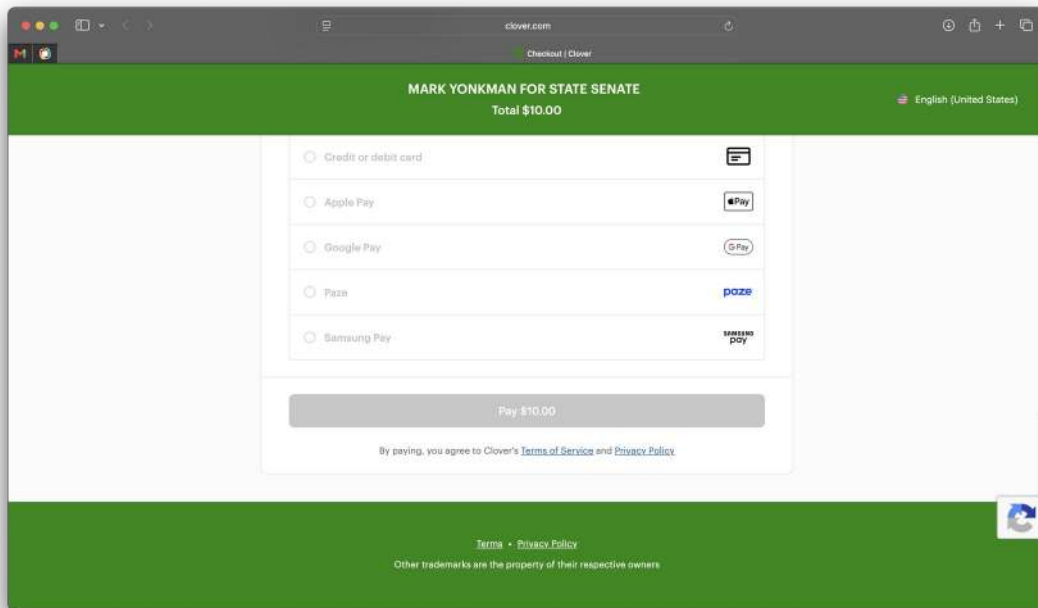
Lower portion of donation page, showing only ActBlue's generic platform disclaimer — no committee name or address appears

EXHIBIT C

Screenshots of the clover.com donation/checkout page for Mark Yonkman, captured on or about August 31, 2026



Upper portion of Clover checkout page, showing "MARK YONKMAN FOR STATE SENATE" banner and payment total



Lower portion of Clover checkout page, showing payment method options and generic Clover terms/privacy links — no disclaimer of any kind appears

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Meegan Zickus — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCRP” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCRP)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrickmi@gmail.com

2. Respondent Information

Candidate: Meegan Zickus

Committee: Not identified by name in the material reviewed

Office Sought: State Representative, District 89

Campaign/Donation Page(s) Reviewed: zickusfor89th.com

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a "Paid for by [Committee]" statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information or instructions for mailing a paper check), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247's identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep't of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a "paid for by" statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with "for [Office]" or "Elect [Name]" language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Monday, August 31, 2026, Complainant's designee accessed the campaign website located at zickusfor89th.com for Meegan Zickus, candidate for State Representative, District 89 (browser tab: "Meegan Zickus"). The header displays a circular stamp-style logo reading "MEEGAN ZICKUS for state rep" encircled by the text "ALL OF 89th DISTRICT" with a Michigan-shaped graphic, beside navigation links "MEET | WHY I'M RUNNING | GET INVOLVED" and social/contact buttons for "Facebook," "Instagram," and "Contact." The "Meet Meegan" section states: "Meegan Zickus is running for the Michigan House because she believes public service is about solving problems, helping people, and strengthening communities—not partisan politics."

Further down the page, three issue tiles are captioned "Everyday Affordability," "Public Education," and "Access to Healthcare," followed by an "ENDORSEMENTS" section displaying the Michigan Association for Justice logo and a second organizational logo. A blue call-to-action banner states: "Join Our Team & Volunteer Today • click to connect." The footer, in small type, reads in its entirety: "© 2026 | Zickusfor89th | 11833 78th Ave, Allendale, MI 49401." This footer line supplies a street address but does not identify any campaign committee by name and does not contain the words "Paid for by" or any equivalent statutory disclosure language. No "Paid for by [Committee Name], [Address]" statement, and no committee name at all, appears anywhere on either portion of the site captured.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

Printed Name: Vance Patrick

Date: August 31st, 2026

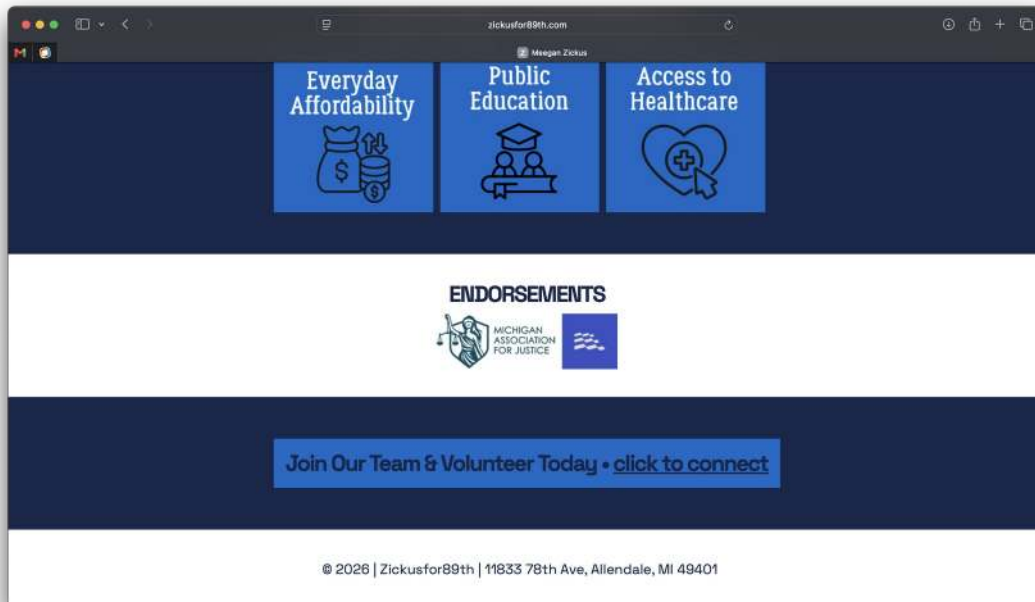
Enclosures: Exhibit A (campaign website screenshots)

EXHIBIT A

Screenshots of the zickusfor89th.com campaign website, captured on or about August 31, 2026



Upper portion of homepage, showing "MEEGAN ZICKUS for state rep" logo, navigation, and "Meet Meegan" section



Lower portion of homepage, showing issue tiles, endorsements, volunteer call-to-action, and footer — address appears with no committee name and no "Paid for by" language

August 31, 2026

VIA EMAIL (BOERegulatory@Michigan.gov)

Michigan Department of State
Bureau of Elections
Richard H. Austin Building — 1st Floor
430 West Allegan Street
Lansing, MI 48918

RE: Campaign Finance Complaint Against Ned Zimmer — Failure to Include Required Disclaimer/Identification Statement on Campaign Materials in Violation of MCL 169.247

To the Bureau of Elections:

The Oakland County Republican Party (“OCR” or “Complainant”) submits this complaint pursuant to the Michigan Campaign Finance Act (“MCFA”), MCL 169.201 et seq., and requests that the Bureau of Elections investigate the respondent identified below for failing to place the disclaimer/identification statement required by MCL 169.247 on campaign materials, including its online campaign material.

1. Complainant Information

Name: Vance Patrick

Title/Role: Chairman, Oakland County Republican Party

Organization: Oakland County Republican Party (OCR)

Mailing Address: 42611 Woodward Ave, Bloomfield Hills, MI 48304

Email: rvpatrikmi@gmail.com

2. Respondent Information

Candidate: Ned Zimmer

Committee: Not identified by name in the material reviewed

Office Sought: State Representative (district not stated in the material reviewed)

Campaign/Donation Page(s) Reviewed: nedformichigan.com; <https://secure.actblue.com/donate/donated> (donation page)

3. Statutory Provision Allegedly Violated

MCL 169.247(1) requires that “[a] person who prints or reproduces or causes to be printed or reproduced, on or after January 1, 1996, any . . . printed matter having reference to an election, a candidate, or a ballot question” bear “an identification” that includes “the name and address of the person paying for the matter.” Bureau of Elections guidance directs candidate committees to satisfy this requirement with a disclaimer stating, in substance, “Paid for by [Committee Name], [Address].” Both elements — the “Paid for by” identification of the committee and the committee's address — are required; a statement that supplies one but omits the other does not satisfy the statute. The identification must also be clear, legible, and set apart from the surrounding text or design of the item. A knowing violation of MCL 169.247 is a misdemeanor under MCL 169.247(6).

The required identification must function as a single, self-contained statement. Bureau of Elections guidance and the statutory text contemplate a unified disclosure of both the committee's name and its address together; a “Paid for by [Committee]” statement that omits an address, or that is set apart from an address appearing elsewhere on the item for an unrelated purpose (such as general contact information), does not supply the identification MCL 169.247(1) requires.

Because the material at issue here is hosted online rather than printed and physically distributed, Complainant notes that the Bureau has already confirmed that MCL 169.247’s identification requirement extends to campaign websites and other online material that expressly advocates for a candidate. See *Golden v. Yahkind* (Mich. Dep’t of State, Bureau of Elections, 2024) (website material found to constitute express advocacy must carry a “paid for by” statement listing the name and address of the committee(s) paying for it, consistent with MCL 169.247(1) and R 169.36(2)).

The material described below satisfies that express-advocacy standard. As detailed in the Statement of Facts, the webpage(s) and/or donation page(s) at issue combine the candidate's name with campaign branding — typically a logo or banner pairing the candidate's name with “for [Office]” or “Elect [Name]” language — together with campaign messaging and a direct solicitation for financial support, votes, or other assistance to the candidate's campaign. Material of that character is express advocacy for the candidate's election; it is not the kind of general political or issue-based communication that would fall outside MCL 169.247's reach.

4. Statement of Facts

A. Campaign Website (Exhibit A)

On or about Friday, August 28, 2026, Complainant's designee accessed the website located at nedformichigan.com for Ned Zimmer, identified on the page as a candidate for Michigan State Representative. The footer of the page displays endorsing-organization logos, social media icons, and the text “All rights reserved. Ned Zimmer for House Representative.” No “Paid for by” statement or other funding-source identification — no committee name, and no address — appears anywhere on the visible footer. This footer text expressly styling the site as “Ned Zimmer for House Representative” constitutes express advocacy for his election under *Golden v. Yahkind*, bringing the page within MCL 169.247's disclosure requirement.

B. Linked Donation Page (Exhibit B)

Complainant's designee also accessed a linked donation page hosted at <https://secure.actblue.com/donate/donate-ned> soliciting contributions to Ned Zimmer. Its only funding-source disclosure is a footer notice stating that the platform itself is “paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee.” No statement identifying a campaign committee for the candidate, by name or address, appears anywhere on the page.

5. Requested Relief

- Investigate the facts alleged in this complaint;
- Determine whether respondent's campaign material identified above violates MCL 169.247;
- Require respondent to promptly correct all noncompliant campaign materials with the disclaimer required by MCL 169.247; and
- Impose any fine, penalty, or other relief the Bureau deems appropriate under the Michigan Campaign Finance Act.

6. Certification

I certify that the information contained in this complaint is true and accurate to the best of my knowledge, information, and belief.

Signature: /s/ Vance Patrick

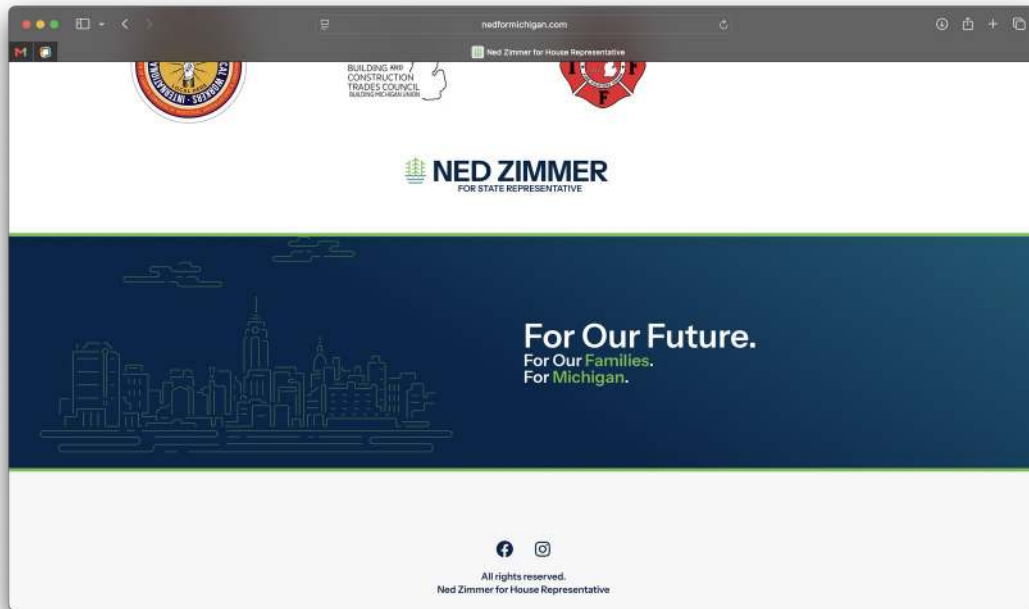
Printed Name: Vance Patrick

Date: August 31st, 2026

Enclosures: Exhibit A (website screenshot); Exhibit B (donation page screenshots)

EXHIBIT A

Screenshot of the nedformichigan.com footer, captured on or about August 28, 2026



Website footer — no disclaimer of any kind visible

EXHIBIT B

Screenshots of the secure.actblue.com donation page for Ned Zimmer, captured on or about August 28, 2026

The screenshot shows the top half of a web browser window displaying the donation page for Ned Zimmer. The browser's address bar shows 'secure.actblue.com'. The page has a dark blue header with the 'NED ZIMMER FOR STATE REPRESENTATIVE' logo. Below the header, the main content area is white. On the left, there is a section titled 'Let's Build a Michigan That Works for Everyone.' followed by a paragraph of text. On the right, there is a 'Choose an amount:' section with a 'Candidate' button and four preset donation amounts: '\$10', '\$100', '\$250', and '\$1,000'. Below these is a custom amount input field. Further down, there is a checkbox for 'Make it monthly!' with a description. At the bottom right, there is a 'Checkout' section with a link to 'Sign in to give faster'.

NED ZIMMER
FOR STATE REPRESENTATIVE

Let's Build a Michigan That Works for Everyone.

I'm Ned Zimmer, and I'm running for State Representative because I believe Michigan's future should be built on respect, trust, and real solutions. Our district is full of families working hard, neighbors showing up for each other, and communities that deserve better than political theater. I'm here to serve—not to grandstand—and to make sure Lansing works for all of us.

This campaign isn't about headlines. It's about the people who call Michigan home. The ones raising kids, caring for aging parents, putting in long hours, and still finding time to support their communities. If you're ready for leadership that's grounded in shared values and focused on a better future, I hope you'll join us. Your support—whether a donation, a conversation, or showing up to volunteer—

Choose an amount:
Your contribution will benefit Ned Zimmer.

[Candidate](#)

☐ \$10 ☐ \$100 ☐ \$250 ☐ \$1,000

☐ **Make it monthly!**
Recurring contributions help us create budgets, hire staff, and plan ahead.

Checkout
☒ Have an ActBlue Express account? [Sign in to give faster.](#)

Upper portion of donation page

The screenshot shows the bottom half of the same web browser window. The main content area continues with the text from the previous section. On the right, the 'Checkout' section is more prominent, showing a link to 'Sign in to give faster' and three payment buttons: 'Pay with card', 'Apple Pay', and 'Donate with Google Pay'. Below the payment options, there is a 'Contribution rules' section with four numbered items. At the bottom, there is a small text block about Americans living abroad and a footer with a disclaimer.

aging parents, putting in long hours, and still finding time to support their communities. If you're ready for leadership that's grounded in shared values and focused on a better future, I hope you'll join us. Your support—whether a donation, a conversation, or showing up to volunteer—means everything. Together, we can make a real difference.

Checkout
☒ Have an ActBlue Express account? [Sign in to give faster.](#)

Or

Contribution rules

1. I am making this contribution with my own personal credit card and not with a corporate or business credit card or a card issued to another person.
2. I am a U.S. citizen or lawfully admitted permanent resident (i.e., green card holder).
3. I am at least eighteen years old.
4. This contribution is made from my own funds, and funds are not being provided to me by another person or entity for the purpose of making this contribution.

Americans living abroad may only contribute through ActBlue while physically in the United States. By proceeding with this transaction, you agree to ActBlue's [terms & conditions](#).

Platform paid for by ActBlue (actblue.com) and not authorized by any candidate or candidate committee. Contributions or gifts to ActBlue are not deductible as charitable contributions for federal income tax purposes. ActBlue is not responsible for candidate or committee content on this page nor any communications made by candidates or committees. ActBlue does not send emails or text messages or make telephone calls on behalf of any candidate or committee. For more information on how the ActBlue platform works, [click here](#).

Lower portion of donation page — only ActBlue's generic platform notice appears