



Michigan Department of State Campaign Finance Complaint Form

This complaint form may be used to file a complaint alleging that someone violated the [Michigan Campaign Finance Act](#) (MCFA). Electronic submission of the form to BOERegulatory@Michigan.gov is strongly recommended. For instructions on how to complete this form, see the [Campaign Finance Complaint Guidebook & Procedures](#) document. All spaces are required unless otherwise indicated.

Section 1. Complainant

Your name		Daytime telephone number
James		[REDACTED]
Mailing address		
[REDACTED]		
City	State	Zip
Caledonia	MI	49316
Email (recommended)		
[REDACTED]		

Section 2. Alleged Violator (Respondent)

Name		
Mark Hardy		
Mailing address		
[REDACTED]		
City	State	Zip
Caledonia	MI	49316
Email (recommended)		
Committee ID (optional)		

Please include email addresses to expedite processing time and mitigate mail delays.

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

Section(s) of the MCFA alleged to be violated:

169.247 Printed matter or radio or television paid advertisement having reference to election, candidate, or ballot question

Explain how these sections were violated:

A.

Mark Hardy placed PRINTED ADS in the April 15 and April 22 editions of The Sun and News (a newspaper serving the Middleville and Caledonia areas) opposing the May 2 ballot question regarding a supplemental bond issue for the Caledonia Community Schools. The Sun and News confirmed to me (SunNewsEmail.pdf) that Mark Hardy was the person who placed these ads, and also that the ads ought to have included his name and address but did not. Also, in each case, Mark Hardy posted the images to Facebook around the same time he transmitted them to the Sun and News.

B:

Mark Hardy has also been distributing "Vote No" LAWN SIGNS bearing no indication of the identity of the party paying for the signs. His Facebook posts show that he is responsible for the signs.

C:

Mark Hardy has also disseminated PAPER FLYERS in the community, similarly lacking the required disclosure.

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

I have uploaded ten files substantiating all of the above to a Dropbox folder:

<https://www.dropbox.com/sh/jgusgw20upzs06v/AAAusOZ08qExEG43UaTgzfSla?dl=0>

A:

SunNewAdApr15.jpeg

SunNewsAdApr22.jpeg

Hardy_VoteNoFBSameAsSunNewsApr15.png

Hardy_VoteNoFBSameAsSunNewsAdApr22.png

SunNewsEmail.pdf

B:

Hardy_VoteNoLawnSigns.png

Hardy_VoteNoLawnSignsGarage.png

Hardy_VoteNoLawnSignsVillage.png

C:

Hardy_VoteNoPaperFlyers.png

Hardy_VoteNoPaperFlyerFB.png

Section 4. Certification *(required)*

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



Signature of complainant

APRIL 24, 2023

Date

Section 5. Certification without Evidence *(supplemental to Section 4)*

If, after a reasonable inquiry under the circumstances, you are unable to certify that certain factual contentions are supported by evidence as indicated above, you may make the following certification:

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

Here is a short URL for the Dropbox folder referenced above:

<https://tinyurl.com/23y9ftb9>

Signature of Complainant

Date

Section 15(8) of the MCFA provides that a person who files a complaint with a false certification is responsible for a civil violation of the MCFA. The person may be required to pay a civil fine of up to \$1,000 and some, or all, of the expenses incurred by the Michigan Department of State and the alleged violator as a direct result of the filing of the complaint.

Section 6. Submission

Once completed, submit the complaint form with your evidence to BOERegulatory@Michigan.gov. Alternatively, you may mail or hand deliver the complaint form with your evidence to the address below. The complaint is considered filed upon receipt by the Bureau of Elections.

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