



PO Box 14162 | Lansing, Michigan 48901 | 517.618.1589 | [www.MichiganFreedomFund.com](http://www.MichiganFreedomFund.com)

January 14, 2019

Michigan Department of State  
Attention: FOIA Coordinator  
Richard H. Austin Building, 1st Floor  
P.O. Box 30204  
430 W. Allegan Lansing, MI 48918

Via Electronic Mail:  
[MDOS-FOIA@michigan.gov](mailto:MDOS-FOIA@michigan.gov)

Freedom of Information Act Request: Daunt v. Build A Better Michigan and Pero v. Build A Better Michigan: Campaign Finance Complaint No. 2018-07-47-24 and No. 2018-06-020-54

Dear FOIA Coordinator:

Pursuant to the Michigan Freedom of Information Act, MCL § 15.231 et seq. (the "Act"), we are hereby requesting a complete copy of any and all public records (within the meaning of the Act) relating to Campaign Finance Complaint No. 2018-07-47-24 (Daunt v. Build A Better Michigan) and/or Campaign Finance Complaint No. 2018-06-020-54 (Pero v. Build A Better Michigan). This request includes, but is not limited to, any and all departmental correspondence or documents, such as letters, electronic mail, drafts, notes, memorandums, etc.

Without limiting the generality of the foregoing request, I am also requesting the following:

1. Any notes, drafts, emails, and any past or future documents or correspondence to or from Ruth Johnson, Melissa Malerman, Adam Fracassi, Sally Williams, Jocelyn Benson, Lori Bourbonais, Evelyn Quiroga, Fred Woodhams, Jennette Sawyer, Hilarie Chambers, or Bill Kordenbrock regarding Daunt v. Build A Better Michigan and/or Pero v. Build A Better Michigan.
2. Any correspondence between the Department of State and the Gretchen Whitmer for Governor campaign, Build a Better Michigan, the Jocelyn Benson for Secretary of State campaign, or any agents thereof.
3. Any correspondence between the Department of State and the executive offices of either Secretary of State Benson or Governor Whitmer regarding Daunt v. Build A Better Michigan or Pero v. Build A Better Michigan.
4. Any documents which demonstrate that the Secretary of State complied with the 45 business day requirement of MCL 169.215(10) with respect to Daunt v. Build A Better Michigan.



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Michigan and/or Pero v. Build A Better Michigan. If no such documents exist, please so specify.

5. Any documents that allow the Secretary of State to fail to comply with the 45 business day requirement of MCL 169.215(10). If no such documents exist, please so specify.
6. Any documents that relate to any extensions granted to any respondent in Daunt v. Build A Better Michigan and/or Pero v. Build A Better Michigan. If no such documents exist, please so specify.
7. Any documents that allow the Secretary of State to grant an extension to a respondent of a campaign finance complaint absent a written request. If no such documents exist, please so specify.
8. Any documents which provide the legal justification to allow the Secretary of State to consolidate the cases of Daunt v. Build A Better Michigan and/or Pero v. Build A Better Michigan pursuant to the October 22, 2018 letter signed by Adam Fracassi. If no such documents exist, please so specify.
9. Any documents where the Secretary of State determined whether or not there may be reason to believe that a violation of the Michigan Campaign Finance Act has occurred in Daunt v. Build A Better Michigan and/or Pero v. Build A Better Michigan. If no such documents exist, please so specify.
10. Any documents that allow the Secretary of State to issue written correspondence to a respondent of a campaign finance complaint, while not copying or providing a copy of such correspondence to the complainant of a campaign finance complaint. If no such documents exist, please so specify.

Please forward the requested information to the address indicated above. The requests described above should be considered ongoing and include any and all future documents or correspondence meeting any of the aforementioned criteria.

I am aware that reasonable fees associated with complying with this request can be charged to me. If there is such a fee, please contact me so that I may arrange for payment. I can be reached at 517-618-1589 or [tony@michiganfreedomfund.com](mailto:tony@michiganfreedomfund.com).

Please note the time limitations found under Section 5 of the Michigan Freedom of Information Act, being MCL 15.235. In the event that not all public records may be located and searched



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within the five-day statutory period, please contact the undersigned to arrange for delivery of any records that can be obtained within the five-day statutory period.

If you deny any or all of this request, or redact any portions of a public record, please list what information was exempted or redacted, and cite each specific exemption you feel justifies the refusal to release said information. I also wish to be notified of the appeal procedures available to me under the law with regard to any potential denials and/or redactions.

Thank you for your assistance in this matter. Your prompt response is appreciated.

Sincerely,

A handwritten signature in black ink that reads "Tony Daunt". The signature is written in a cursive, flowing style.

Tony Daunt  
Executive Director  
Michigan Freedom Fund