Michigan Department of State Campaign Finance and Financial Disclosure Complaint Form

This complaint form may be used to file a complaint alleging that someone violated the Michigan Campaign Finance Act (MCFA), the Candidate for Office Financial Disclosure Act, or the Public Officers Financial Disclosure Act (financial disclosure acts). Electronic submission of the form to BOERegulatory@michigan.gov is strongly recommended. For instructions on how to complete this form, see the Campaign Finance and Financial Disclosure Complaint Guidebook document. All spaces are required unless otherwise indicated.

Section 1. Complainant

Your name		Daytime telephone number
Julie Grand		(734) 678-7567
Mailing address		
1604 Brooklyn Avenue		
City	State	Zip
Ann Arbor	MI	48104
Email *(recommended)*		
juliebgrand@gmail.com		

Section 2. Alleged Violator (Respondent)

Name		
Yousef Rabhi for Ann Arbor		
Mailing address		
P.O. Box 7096		
City	State	Zip
Ann Arbor	MI	48107
Email *(recommended)*		
CM@Voteyousef.com		
Committee ID *(optional)*		
C-2026-004		

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

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

I allege a violation of the following:

- ✓ MCFA
- ☐ Public officer disclosure
- ☐ Candidate disclosure

Identify the section(s) of the MCFA or relevant financial disclosure act section(s) alleged to be violated and explain how the section(s) were violated:

Please see Attachment A.

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

Exhibit 1 – Ward 2 Mailer Endorsing Teesha Montague
Exhibit 2 – Ward 3 Mailer Endorsing Ryan Bartholomew
Exhibit 3 – Ward 4 Mailer Endorsing Dave Zeglen
Exhibit 4 – Ward 5 Mailer Endorsing Greg Monroe

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 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:

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. MCL 169.215(16).

The financial disclosure acts prohibit a person from filing a complaint with a false certification. MCL 169.313(7); MCL 15.713(7).

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

Attachment A
Section 3 – Allegations

SECTION 3 – ALLEGATIONS

Section(s) of the MCFA violated: MCL 169.244(2); MCL 169.271(2)

Explain how those section(s) were violated: Yousef Rabhi is running to be the next Mayor of Ann Arbor. On January 25, 2026, Mr. Rabhi formed a candidate committee to support his mayoral run—Yousef Rabhi for Ann Arbor.

On or about the week of July 6, 2026, Yousef Rabhi for Ann Arbor mailed literature to electors throughout the City of Ann Arbor. The mailers that landed in Wards 2, 3, 4, and 5 contained special messages—endorsements of candidates for City Council. For example, the mailer sent to electors in Ward 5 included the following language:

> Yousef <u>endorses</u> Greg Monroe for City Council Ward 5
>
> "It's clear Greg cares deeply about our city and is striving for a future we can all share together. He's committed to serving through real engagement and collaboration, pursuing growth that includes households of all incomes and protecting the trees and natural areas that make Ann Arbor a wonderful place to call home. That's the type of leadership Ward 5 deserves, and I'm proud to support him."

Exhibit 4. Each mailer included similar language for the Ward-specific candidate. See Exhibit 1 (endorsing Teesha Montague); Exhibit 2 (endorsing Ryan Bartholomew); Exhibit 3 (endorsing Dave Zeglen).

The Michigan Campaign Finance Act, 1976 PA 388, as amended, MCL 169.201 to 169.282 (the "**MCFA**"), does not consider an endorsement, in and of itself, to have value.[1] The means of disseminating the endorsement may, however, have value and be considered a contribution.[2] The MCFA defines a "contribution" as

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

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[1] Michigan Department of State, Bureau of Elections, *Michigan Campaign Finance Candidate Manual*, p 22 (accessed July 14, 2026) ("An endorsement is not (in and of itself) a contribution under the MCFA.").

[2] *Id.* ("[T]he expense to communicate the endorsement may be considered a contribution to a candidate committee. Therefore, committees and organizations must be in compliance with the MCFA when making expenditures to communicate an endorsement.").

MCL 169.204(1). Relatedly, an "in-kind contribution" is defined as "a contribution . . . other than money." MCL 169.209(4).

The mailers at issue are a donation of something of ascertainable monetary value—the mailers were sent to electors throughout four wards in the City of Ann Arbor that advertised and promoted the endorsements.

These circumstances trigger a prohibition that is contained twice within the MCFA. First, Section 44(2) provides that "[a] candidate committee shall not make a contribution to or an independent expenditure on behalf of another candidate committee." MCL 169.244(2). A single knowing violation of Section 44 results in a misdemeanor punishable by imprisonment of up to 90 days, a fine of up to $1,000.00, or both. MCL 169.244(5).

Second, Section 71(2) provides that "[a] candidate committee shall not make a contribution to another candidate committee." MCL 169.271(2). A single knowing violation of Section 71 holds the same punishment as that of Section 44. See *id.*

In circulating each mailer to four of the five wards within the City of Ann Arbor, Yousef Rabhi for Ann Arbor violated the Michigan Election Law by contributing to each other candidate. Yousef Rabhi for Ann Arbor's mailers constitute in-kind contributions to each of the four City Council candidate committees—they are contributions other than money with ascertainable monetary value, *i.e.*, the amount of money spent to design, print, and send each mailer.

Moreover, because Yousef Rabhi for Ann Arbor funded and circulated a citywide mailer that includes Mr. Rabhi's endorsement of four candidates for City Council, the endorsements were advertised and promoted—they went well beyond mere endorsements, in and of themselves. Yousef Rabhi for Ann Arbor necessarily made contributions to the candidates for City Council that Mr. Rabhi endorsed.

In other words, Yousef Rabhi for Ann Arbor—a candidate committee—made contributions to the following candidate committees: (1) Montague for A2; (2) Committee to Elect Ryan Bartholomew; (3) Dave Zeglen for the People; and (4) Greg Monroe for City Council.

Yousef Rabhi for Ann Arbor's contributions explicitly violate Sections 44(2) and 71(2) of the MCFA. A candidate committee may not make a contribution to another candidate committee. This is precisely what occurred here.

I respectfully ask that the Department of State find that there may be reason to believe that Yousef Rabhi for Ann Arbor violated Sections 44(2) and 71(2) of the MCFA on at least four occasions.

Evidence that supports those allegations:

Exhibit 1 – Ward 2 Mailer Endorsing Teesha Montague

Exhibit 2 – Ward 3 Mailer Endorsing Ryan Bartholomew

Exhibit 3 – Ward 4 Mailer Endorsing Dave Zeglen

Exhibit 4 – Ward 5 Mailer Endorsing Greg Monroe

Exhibit 1
Ward 2 Mailer Endorsing
Teesha Montague

VOTE ON OR BEFORE TUESDAY AUGUST 4TH

YOUSEF RABHI

DEMOCRAT for MAYOR

Get involved: Donate:

As Mayor, Yousef will focus on what matters most:

COST OF LIVING

Ann Arbor is too expensive. Property taxes, rent, and rates keep going up, but residents aren't getting the city services they pay for. Yousef will fight to protect affordability, reinvest tax dollars into public services, and make sure working families, seniors, and young people can build a future here.

PUT THE PEOPLE BACK IN CHARGE

For too long, City Hall has put developers and consultants ahead of residents. Taxpayer dollars should strengthen public services, not fund giveaways for special interests. Yousef will give the people a real seat at the table and make City Hall answer to the community. No more rubber stamps.

SMALL BUSINESSES

The local businesses that are the backbone of Ann Arbor are dying. Rising costs and policies that favor corporations are threatening the shops, restaurants, and small businesses that make our city special. Yousef will communicate with and advocate for local businesses and reverse the policies that are pushing them out of our community.

Learn more at voteyousef.com

@VoteRabhi @yousefrabhi_a2 @voteyousef

ITS TIME FOR A NEW MAYOR IN ANN ARBOR

YOUSEF RABHI DEMOCRAT for MAYOR

YOUSEF WILL PUT PEOPLE FIRST!

Endorsed by:

AFSCME Michigan

United Auto Workers Region IA

U.S Senator Bernie Sanders

The Ann Arbor Education Association

International Brotherhood of Teamsters Local 243

Graduate Employee's Organization

Democratic Socialists of America Huron Valley

Huron Valley Area Labor Federation

Ann Arbor Tenants Union

Ann Arbor Indivisible

Yousef endorses Teesha Montague for City Council Ward 2

"I support Teesha Montague for Ward 2 because she has a proven record of serving our community and advocating for residents. Teesha has been doing the work for years, whether through affordable housing advocacy, public service, community leadership, or neighborhood engagement.

She listens to people, asks tough questions, and understands the challenges facing working families, seniors, and longtime residents. I know she will bring integrity, transparency, and a strong commitment to community-centered leadership on City Council."

Paid for by Yousef Rabhi for Ann Arbor | P.O. Box 7096 Ann Arbor, MI 48107

YOUSEF RABHI DEMOCRAT for MAYOR

Or Current Resident

Ann Arbor MI 48105-3657

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Exhibit 2
Ward 3 Mailer Endorsing
Ryan Bartholomew

VOTE ON OR BEFORE TUESDAY AUGUST 4TH

YOUSEF RABHI

DEMOCRAT for MAYOR

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- International Brotherhood of Teamsters Local 243
- Graduate Employee's Organization
- Democratic Socialists of America Huron Valley
- Huron Valley Area Labor Federation
- Ann Arbor Tenants Union
- Ann Arbor Indivisible

Yousef endorses Ryan Bartholomew for City Council Ward 3

"I've worked with Ryan on meaningful progressive policy and watched him consistently show up for our community. I'm proud to support him for City Council in Ward 3 and excited by his bold ideas to make life more affordable for Ann Arbor's working families."

Paid for by Yousef Rabhi for Ann Arbor | P.O. Box 7096 Ann Arbor, MI 48107

YOUSEF RABHI DEMOCRAT for MAYOR

Or Current Resident
[redacted]
Ann Arbor MI 48104-6433

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Exhibit 3
Ward 4 Mailer Endorsing
Dave Zeglen

VOTE ON OR BEFORE TUESDAY AUGUST 4TH

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- Democratic Socialists of America Huron Valley
- Huron Valley Area Labor Federation
- Ann Arbor Tenants Union
- Ann Arbor Indivisible

Yousef endorses Dave Zeglen for City Council Ward 4

"I am proud to support Dave Zeglen for City Council in Ward 4. Dave's proven advocacy for working people and dedication to grassroots community organizing demonstrate his commitment to real progressive change in our city. His passion and integrity are why Ann Arbor can count on him to fight for a city that works for everyone."

Paid for by Yousef Rabhi for Ann Arbor | P.O. Box 7096 Ann Arbor, MI 48107

YOUSEF RABHI DEMOCRAT for MAYOR

Or Current Resident
Ann Arbor MI 48103-5744

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Exhibit 4
Ward 5 Mailer Endorsing
Greg Monroe

VOTE ON OR BEFORE TUESDAY AUGUST 4TH

YOUSEF RABHI

DEMOCRAT for MAYOR

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Paid for by Yousef Rabhi for Ann Arbor | P.O. Box 7096 Ann Arbor, MI 48107

YOUSEF RABHI DEMOCRAT for MAYOR

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