

DAILEY LAW FIRM, P.C.

July 30, 2010

Office of General Counsel
Federal Election Commission
999 E Street, NW
Washington DC, 20463
Via Federal Express

RECEIVED
FEDERAL ELECTION
COMMISSION

2010 AUG -5 AM 11:12

OFFICE OF GENERAL
COUNSEL

Re: Complaint against Welday For Congress, et al

MUR #

6342

To Whom It May Concern

Complainant Rocky for Congress (address 34122 Woodward Ave, Birmingham, Michigan 48009) files this complaint against Respondents Paul Welday, Welday for Congress, Michigan Education Network, Joseph Munem and Michael Greiner

Andrew Rocky Raczowski (Rocky) and Paul Welday are opponents for the Republican nomination for Michigan's Ninth Congressional District. Rocky, a former State Representative, and former candidate for United States Senate, has long been leading Welday in the polls and has greater financial resources than Welday. Welday, former Chief of Staff to Congressman Joe Knollenberg, does not have the name recognition or finances to match Rocky.

Rocky has personal knowledge that throughout this campaign, Welday has made numerous false allegations about Rocky. Among them, Welday has falsely accused Rocky of taking money from his various campaign funds and paid those funds over to his private business, Mainline Communications. Specifically, Welday accused the following campaigns of giving money to Mainline Communications:

Citizens for Raczowski	\$41,090.97
Rocky for Senate	\$68,113.66
Raczowski Leadership Fund	\$7,564.04
Michigan Future Fund	\$4,212.00

Attached is a print-out from Welday's website demonstrating these accusations.

Rocky also has personal knowledge that July 29, 2010, the attached literature piece was sent to the voters in the Ninth Congressional District. It makes the same accusations against Rocky and Mainline Communications, even down to the penny.

Citizens for Raczowski	\$41,090.97
Rocky for Senate	\$68,113.66
Raczowski Leadership Fund	\$7,564.04
Michigan Future Fund	\$4,212.00

The address on this literature piece is 29405 Hoover Rd, in Warren, Michigan 48093. This is the office of attorney Michael Greiner. Upon information or belief, Rocky believes that Greiner is an associate of Joseph Munem, who is a self-described "political terrorist." Munem is a long-time political menace, who

28000 WOODWARD AVE, SUITE 201 • ROYAL OAK, MI 48067

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ENCLOSURE

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has for several years made a living by creating phony political action committees, and sending outrageous and slanderous literature pieces and attack ads. Upon information or belief, Michigan Education Network does not actually exist. Rocky has not found any evidence that the Michigan Education Network exists. It is not listed with the State of Michigan, the IRS, or the FEC. Rocky therefore believes that this is merely the latest effort by Munen and Greiner. Attached are newspaper stories about the association between Munen and Greiner, as well as a printout from the State Bar of Michigan's website showing Greiner's address to be 29405 Hoover Rd in Warren, Michigan.

In conclusion, it is Rocky's opinion that this attack piece was paid for by the desperate Welday campaign, who is using shadowy and insidious proxies to attack Rocky's credibility in last days of a contested primary. We ask the FEC to investigate Paul Welday and the Welday for Congress for illegal coordination.

I, Andrew Rocky Raczkowski, am of competent age and legal capacity to attest to the facts as stated above. I swear, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge.

Respectfully Submitted,

Rocky for Congress

Andrew Rocky Raczkowski

Respectfully Submitted,

DAILEY LAW FIRM

Richard C Ambrow
(P63301)

Signed and sworn to before me

DAVID WYNN
NOTARY PUBLIC - MICHIGAN
WAYNE COUNTY
ACTING IN THE COUNTY OF OAKLAND
MY COMMISSION EXPIRES SEPT. 25, 2014

[Signature]

7-30-10

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"Truth or Consequences" - The Raczkowski Record

Representing the people of Michigan's Ninth Congressional District in the U.S. House of Representatives is a high honor judgment, and candor from those who seek the trust of the voters. Those who seek to serve must be prepared to withstand opposition, since the backgrounds and experience of those seeking public office are important campaign issues.

Unsettling issues have been raised in the media for Congress in Michigan's Ninth District about the candor and integrity of a us respect and admire all those who have served in our nation's military, it is legitimate to examine the integrity of the record baseless" about any of the facts brought to light about Mr. Raczkowski's background. These facts have not been exaggerated. If we would not have brought up these facts in the primary, Gary Peters would have certainly used them against him in the these facts have arisen, but that does not make them less relevant to his candidacy.

First, it must be said that no one is perfect, and all of us have our shortcomings. There are pros and cons to every candidate documented facts and the complete truth will be allowed to win the informed discussion based on information verifiable in the Raczkowski are available in the public record and easily searchable online. The evidence presented here, and Mr. Raczkowski carefully now, as it is certain that this information will be topical as long as Mr. Raczkowski is a candidate for any public office.

TROUBLING FACTS: The Law suit

TROUBLING FACTS: The Law Doesn't Seem to Apply to Rocky

Raczkowski has been questioned by state and federal authorities about numerous campaign finance irregularities over the inappropriate campaign spending, failure to file legally required disclosure of donor information and failure to file his own F by the Ethics in Government Act of 1976.

Even in his rebuttal to one portion of these facts, Mr. Raczkowski acknowledges he did not comply with the specifics of the like the fact that his disregard for the law was brought to light by the Welday campaign. But, isn't it true that regardless of

Mr. Raczkowski goes on to say that since he ran a "shoestring" campaign against Sen. Carl Levin (D-MI) in 2002, his sloppy reports should be forgiven. All one has to do is to take a look at these reports to see a disaster that is sure to be brought to Chairman Mark Brewer and his henchmen. Raczkowski has opened and maintained four different federal campaign committees. Contrary to his supporters' claims, questions raised by the Federal Election Commission have never been in Failure to file reports. Thousands in fines to the federal government for questionable activity.

To review just one of the summary pages for the Faculty for Senate committee for yourself, please click here.

Rocky's rebuttal also claims once again that he ran this campaign on a "shoestring." But if that is the case, why did he fail to raised from sincere contributors during the actual campaign against Senator Levin and leave this mess in his account the mail fundraising and personal expenses? Again, questions in need of an answer.

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Additionally, a tremendous amount of the money landed directly in Mr Raczkowski's own pocket. Reports show that Rock Communitations – from which he profited personally. According to reports from the State of Michigan and the Federal Election Commission going to Marlene Communitations include

Citizens for Raczkowski	\$41,080.87
Rocky for Senate	\$68,113.68
Raczkowski Leadership Fund	\$7,584.04
Michigan Future Fund	\$4,212.00
TOTAL	\$120,990.59

Finally, it should be noted that every candidate for Congress must file a report with the Clerk of the House known as the P. was mandated in the Ethics in Government Act of 1976. As of July 8, 2010, Mr Raczkowski had failed to file this report. (neglect regarding the transparency and forthrightness of Mr Raczkowski)

To suggest this so-called "attack" is a diversion from the key issues in the campaign is laughable. What issue is greater than

We hope you will decide whether this is something worth considering as you make your decision about who will be best at

TROUBLING FACTS Is Rocky Standing Up To or Standing Up For Special Interests?

TROUBLING FACTS He says He Works for Us But Apparently Not When He Has a Chance to Climb the Political Ladder

We understand that these are troubling facts for Mr Raczkowski. But they are even more troubling for voters heading to the

Here are some important questions to ponder

- 1 Which candidate is likely to be dogged with questions about their record that will give the Democrats every opportunity this election?
- 2 Which Republican candidate is best able to keep the general election debate on the Obama-Pelosi-Peters big government, free-market, pro-growth economy?
- 3 Who is the candidate best able to focus on the major issues of jobs and the economy?
- 4 Who can best hold Gary Peters accountable for outrageously liberal voting record in Washington, DC?
- 5 Who is the candidate who has a proven track record in business and the experience on Capitol Hill to make a difference?

Facts can be stubborn things. But after examining them, we are confident that the voters of the Ninth District will make the right choice August 3rd

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Rocky Raczkowski's political finances just don't add up!



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Michigan Election Monitor
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Warren, MI 48090

Publication
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PERMIT NO. 608

THE RACZKOWSKI FAMILY
OR CURRENT RESIDENT
32064 BONNET HILL RD
FARMINGTON HILLS MI 48334-3404

ECRL07-C016

Rocky Raczkowski dumped \$120,980.67 of campaign donations into his own business!

Records on file with the Michigan Secretary of State and the Federal Election Commission prove that Rocky Raczkowski paid his company, Mainline Communications, with money he raised from political donors!

Campaign Donations Rocky Raczkowski paid to his own company, Mainline Communications:

Citizens for Raczkowski	\$41,090.97
Rocky for Senate	\$68,113.66
Raczkowski Leadership Fund	\$ 7,564.04
Michigan Future Fund	\$ 4,212.00
TOTAL:	\$120,980.67

Call Rocky Raczkowski at 248-556-4400 and ask him to explain why he paid his company out of campaign funds



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Results of Campaign Finance Committee Search

Criteria used for the search

- Candidate/Committee Name **"MICHIGAN EDUCATION NETWORK"**
- Include Active/Pending & Dissolved Committees

Click on committee name to view Statement of Organization Information

Results sorted by Committee Name

No records found based on the criteria you entered

Matches 0

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Based on your Search Criteria of

Searching for Form 8871, Form 8872, and Form 880
Organization Name "Michigan"

The following results have been found

891 items found displaying 231 to 240	Page 24 25 26 27 28 29 30 31 Next
Organization Name	EBN
MICHIGAN DISTRICT JUDGES EDUCATION FUND	30-0248418
MICHIGAN DISTRICT JUDGES EDUCATIONAL FUND	30-0250980
MICHIGAN DOCTORS PAC	30-0250004
MICHIGAN DOCTORS POLITICAL ACTION COMMITTEE	30-0250004
MICHIGAN ED ASSN POLITICAL ACTION COMM	30-0250344
MICHIGAN ED ASSOC POLITICAL ACTION COMMITTEE	30-0250344
MICHIGAN ED ASSOC PAC	30-0250344
MICHIGAN EDUCATION ASSOC COMMITTEE	30-0250344
MICHIGAN EDUCATION ASSOCIATION POLITICAL ACTION COMMITTEE	30-0250344
MICHIGAN EDUCATION ASSOCIATION POLITICAL ACTION COMMITTEE	30-0250344

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Based on your Search Criteria of

 Searching for Form 8871 Form 8872 and Form 880
 Organization Name "Michigan"

The following results have been found

Organization Name	Form	25	26	27	28	29	30	31	32	Next
MICHIGAN EDUCATION ASSOCIATION POLITICAL ACTION COUNCIL	8871									
MICHIGAN EDUCATION ASSOCIATION POLI	8871									
MICHIGAN EXCELLENCE IN PUBLIC SERVICE	8871									
MICHIGAN EXCELLENCE PUBLIC SERVICE MEMPH	8871									
MICHIGAN FIREMEN PAC	8871									
MICHIGAN FUNERAL DIRECTORS ASSOC	8871									
MICHIGAN FUNERAL DIRECTORS ASSOC PAC	8871									
MICHIGAN FUNERAL DIRECTORS ASSOC PAC	8871									
MICHIGAN FUNERAL DIRECTORS ASSOC POLITICAL ACTION COM	8871									
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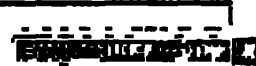
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Michael Anthony Greiner - F68241 (active and in good standing)

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News

Macomb political activists unite to oppose Bouchard, Snyder for governor

Published Wednesday, February 10, 2010

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By Chad Selwiski, Macomb Daily Staff Writer

A newly created nonprofit organization that has launched a campaign that's bashing two Republican candidates for governor is associated with notorious Macomb County political consultants and local political activists who are supporting GOP front-runner Mike Cox.

The Michigan Civic Educational Fund, based in Mount Clemens, is ready to spend tens of thousands of dollars harshly criticizing Oakland County Sheriff Mike Bouchard and Ann Arbor businessman Rick Snyder, two of Attorney General Cox's leading opponents in the August Republican primary.

The campaign, MCEF, was formed in November by attorney Cecil St. Pierre, attorney Mike Gussner and Warren Assistant City Attorney Jeff Schroder, according to state documents. They have hired political consultant Joe Murren to conduct their "educational" activities about Bouchard and Snyder.

The MCEF first appeared on the political radar screen last week when they launched a highway billboard on a busy section of I-75 near M-59 that questions Bouchard's track record. The nonprofit group has also set up Web sites raising numerous questions about Bouchard and Snyder.

But it's the tone of the group's radio ads, which are just getting started in southeast Michigan and western Michigan, that will raise eyebrows in political circles across Michigan. One compares Bouchard to the exploits of former Detroit Mayor Kwame Kilpatrick and another claims that Snyder was responsible for the "explosion" of his former company.

A spokesman for the Cox campaign has said the candidate is not "in any way" connected to the MCEF.

But campaign finance records show that Schroder has contributed \$550 to Cox's gubernatorial campaign and St. Pierre has donated \$250 to the attorney general. Election documents also suggest other shadowy connections between the MCEF and the attorney general.

Because MCEF is a 501(c)(4) nonprofit, under Internal Revenue Service rules it does not have to report the names of its contributors, unlike a political committee that must issue financial documents on a regular basis. The group can engage in political advocacy, as long as it does not favor one candidate.

Greiner said the group consists of "very, very concerned citizens" who want to ensure that Michigan voters have information about gubernatorial candidates that goes beyond the typical public relations sales pitches. The Warren-based attorney would not release a list of contributors.

"There are lots of people who are the money behind this. I'm one of them. Cecil St. Pierre is one of them. And the list goes on," he said.

As for a perceived connection to Cox, Greiner said the group expects to raise less than \$100,000 from a wide variety of sources.

"Yeah, there are people in the group who support Cox. But there are a lot of people who don't," Greiner said.

All of the known players involved have deep connections to Warren city politics.

Munem and Greiner, sometimes working in partnership, became infamous over the past decade for hardball, negative campaigns they orchestrated.

Munem has made his dislike for Snyder well known in a weekly podcast the consultant co-hosts and in a Web site he created, npoffnick.com. Three weeks ago Munem paid for automated phone calls to voters criticizing Snyder.

St. Pierre, who has been a Democrat, a Republican and has also run as a nonpartisan candidate, is a former Warren city councilman. He has also thrown his hat into the ring for a few gubernatorial appointments to judicial seats.

Greiner is a Democrat but said he is intervening in the Republican gubernatorial campaign because he is motivated by "my loyalty to my state." Greiner said he and other MCEF members are dismayed by the failures of the Granholm administration over the past years.

The Bouchard campaign has dismissed the billboard and Web site, oaklandsheriff.net, as "gutter politics." But the radio ads go beyond the Web site material.

The MCEF's anti-Bouchard ad implies that he had an affair with a government employee and walked out of a deposition related to a lawsuit claiming he had engaged in sexual harassment. The ad does not mention Kwame Kilpatrick but it compares Bouchard's behavior to the 2009 scandal that rocked Detroit city hall.

The anti-Snyder ad said that his tenure as a Gateway Computers executive resulted in the company sending 19,000 jobs overseas, losing 90 percent of its corporate value, and then providing Snyder with a "golden parachute" exit. In a radio interview on Monday, Greiner called Snyder "possibly one of the worst CEOs in America."

Meanwhile, Cox has devoted considerable time campaigning in Macomb County. Warren Mayor Jim Fouts has latched onto Cox in recent months, with both calling for stronger ethics rules in government. In addition, the mayor and the AG appeared together at a spaghetti dinner fundraiser last week in Warren.

Fouts did not return a phone call seeking comments.

Among the other findings by The Macomb Daily, based on campaign finance records:

An obscure political action committee called Macomb Business United is run by one of Fouts' appointees, Warren deputy public service director, Gus Ghanam. The PAC gave \$16,850 to the Cox campaign. The PAC's address is listed as the same location as for MCEF — St. Pierre's Crocker Boulevard law office in Mount Clemens. Greiner said he is not aware of any connection between Ghanam and the MCEF.

Ghanam, a longtime fixture in Warren politics, personally contributed \$550 to Cox. The Ghanam PAC's largest contributor in 2009, by far, was not anyone associated with the Macomb County business community. Macomb

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Business United received \$10,000 from a PAC that is controlled by GOP state Sen Bruce Patterson. Patterson is from Canton Township, which is far from Macomb County, but the senator is a close political ally of Cox.

Patterson's group, which focuses on keeping a Republican majority in the state Senate, had already donated the maximum allowed for a PAC to Cox's campaign, \$34,080. Then this "Commander's Majority Fund" made its \$10,000 contribution to Macomb Business United on Dec 31 — the same day that the business PAC, in turn, contributed \$6,600 to the attorney general's gubernatorial effort.

Beyond the distribution of money, Macomb Business United held a fundraiser for Cox on Nov 4 at the White House Wedding Chapel in Warren. Just 20 people attended and the event lost \$1,700.

Comments

The following are comments from the readers. In no way do they represent the view of macombdaily.com.

Bob wrote on Feb 10, 2010 6 45 AM

"Obama brought Chicago politics to Washington. Now, Cox wants to bring Warren politics to Lansing. Can things get worse?"

Report Abuse

Enough of this wrote on Feb 10, 2010 6 54 AM

"Munem, Greiner, St Pierre need to read a newspaper or watch TV. The voters are tired of this kind of political hatchet job.

Make Cox for Governor, let's see former Wayne County prosecutor, then attorney general, now wants to run the state. No business experience, no executive experience, only a lawyer and political machine hack.

Is this a rerun of Granholm? I've seen enough of this, and then throw in Cox's coverup of the Kwame party rumors and there is enough there for me to vote for a Democrat."

Report Abuse

I like the name wrote on Feb 10, 2010 7 00 AM

"Rick Snyder has no political baggage. Mike Cox and Sheriff Bouchard. Throw in sheriff hackel their all in it together.
Rick Snyder for Governor."

Report Abuse

Do Doot Do Doot wrote on Feb 10, 2010 7 09 AM

"Do Doot Do Doot Do Doot, just when you thought it was safe to go back into the water. The political sharks are coming back out. The Mark Stunkberg toadie trio of Pee-air, Grinder, & Pew-numb are back at it. Please men (?), go back under whatever rock you crawled out from."

Report Abuse

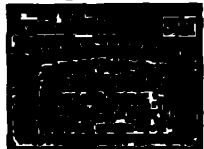
This should be fun wrote on Feb 10, 2010 7 15 AM

"Wow, what a great article. Let's watch the right wing crazies on the blog beat each other up for a change! Yeh!"

Report Abuse

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Shadowy group resurfaces, pays for new Cox ads

Published Friday, July 23, 2010

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By Chad Selweski, Macomb Daily Staff Writer

PAC tied to Warren political players

A shadowy political group apparently run by Warren political activists is raising questions again after it came up with approximately \$180,000 to finance a TV ad campaign that praises gubernatorial candidate Mike Cox and slams one of Cox's Republican foes, Pete Hoekstra.

The ads launched Thursday are financed by Mount Clemens-based Michigan Business United, a political action committee led by one of Warren Mayor James Ford's appointees, Assistant Public Services Director Gus Ghanam. The group reported no money raised or spent as recently as April but is fully financing the new ad campaign, airing on all three of metro Detroit's broadcast affiliates.

Critics say the advertising effort flies in the face of Cox's repeated calls for more transparency and higher ethics in the gubernatorial contest and in state government.

Another candidate in the Aug. 3 GOP primary election, Rick Snyder, immediately pounced on the news that Ghanam, a Cox supporter, was financing the new ads.

"We urge the Macomb and Wayne County Prosecutor's Offices to fully investigate this matter and ensure that state laws are being abided by," said Jake Suski, a Snyder campaign spokesman. "Just yesterday (Wednesday) Mike Cox was talking about transparency. He has a chance here to walk the walk. Yet, it would be an 'urban legend' to expect the attorney general to investigate this incident and the likely coordination between his campaign and Michigan Business United."

Cox campaign spokesman Stu Sandler could not be reached for comment. But he has consistently said that it is "absolute nonsense" to claim the candidate has any direct ties to political groups led by Ghanam and other Warren allies.

In a brief phone interview with The Macomb Daily on Thursday, Ghanam offered no explanation for the source of the funds spent by his obscure PAC

"I'll have to find out what my reaction is going to be and get back to you," he said. He did not call back.

According to state and county records, Michigan Business United morphed from a previous PAC known as Macomb Business United, both of which were based at the Mount Clemens law office of Cecil St. Pierre, a former Warren councilman.

St. Pierre said he has no connections to Michigan Business United and had little involvement with Macomb Business United.

"I was with Macomb Business United. I formed it and I can't remember if I was the treasurer or something like that," he said. "We didn't do much."

Asked how the new version of the PAC, Michigan Business United, could afford a six-figure ad campaign, St. Pierre replied, "I don't have a clue."

The ads criticize Congressman Hoekstra for supporting the federal bank bailout and missing votes on a health care reform bill that, according to congressional opponents, might allow taxpayer-funded abortions. The second half of the commercial praises Cox, in his role as attorney general, for waging court fights against the new health care law and opposing attempts to make abortion more accessible.

The funding controversy marks the second time in five months that Cox has been accused of orchestrating a stealth campaign to boost his candidacy.

In February, a nonprofit group associated with St. Pierre paid for websites that criticized Snyder and another Republican contender in the governor's race, Oakland County Sheriff Michael Bouchard. The Michigan Civic Educational Fund also blasted Bouchard in a billboard located at one of Oakland County's busiest intersections.

The group, formed in November, also financed a series of sharply worded radio ads. One compared Bouchard to the explosion of former Detroit Mayor Kwame Kilpatrick and another claimed that Snyder was responsible for the "explosion" of his former company.

The Michigan Civic Educational Fund, also based at St. Pierre's Crocker Boulevard's law office, is not required to report the names of its contributors because it is not a PAC. The Educational Fund was quietly formed last November by St. Pierre, former Warren deputy mayor Mike Greiner and Warren assistant city attorney Jeff Schroder. St. Pierre and Schroder donated a combined \$800 in political contributions to Cox just before and after the group was created.

As for Ghanam, a longtime fixture in Warren politics, he personally contributed \$550 to Cox last year. The Ghanam PAC's largest contributor in 2009, by far, was not from anyone associated with the Macomb County business community but rather state Sen. Bruce Patterson, a Canton Township Republican whose PAC chipped in \$10,000.

When Ghanam's PAC, in turn, donated more than \$16,000 to Cox over a period of two days, county and state elections officials notified Ghanam that he must revise his group's status from a local PAC to a state PAC.

That resulted in the transformation to the new name, Michigan Business United, apparently without St Pierre's knowledge

St Pierre said that the nonprofit group and the two PACs all operate separate from each other

Ghanam's old PAC held a sparsely attended fundraiser for Cox in 2009 and Ghanam, as recently as last weekend's Italian-American Festival in Warren, has been seen ushering the attorney general at local events

When the Snyder campaign received word Wednesday that Ghanam's new PAC was financing upcoming Cox ads, a small group of Snyder campaign volunteers confronted him in the Warren City Hall parking structure. In a video of the incident posted on YouTube, Ghanam is seen repeatedly saying, "You're not taking my picture." He also appears to grab the arm of one Snyder volunteer to prevent him from videotaping the conversation.

Comments

The following are comments from the readers. In no way do they represent the view of macombdaily.com

Grossbeck Gary wrote on Jul 23, 2010 12:46 AM

"Ghanam is a close personal friend of Stu Sandler! How's that for a direct-enough tie between the PAC and the campaign! The alarming thing is that these are the people who could be running our state if Cox wins. More bad news for Michigan if that happens."

Report Abuse

Hangman wrote on Jul 23, 2010 4:12 AM

"If we vote Cox in we're getting more of the same old same old, time to get rid of the trash!"

PS: How many favors did he get for the "Urban Legend" decision?"

Report Abuse

Stan wrote on Jul 23, 2010 5:29 AM

"Yeah how about some investigative reporting please?"

Report Abuse

Amazing wrote on Jul 23, 2010 6:47 AM

"Just by reading the headline you are able to identify the author."

Report Abuse

Slim Pickings wrote on Jul 23, 2010 7:24 AM

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