

**Complaint Against Glenn Clark,  
Michigan Faith and Freedom Coalition,  
Palazzo Grande and Santorum for President for  
Violations of the Federal Election Campaign Act**

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OFFICE OF GENERAL  
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MUR # 6540

**I. Facts**

Glenn Clark, Troy, MI 48007 is President of the Michigan Faith and Freedom Coalition (MFFC) P.O. Box 4553, Troy, MI 48099, a Michigan nonprofit corporation and he serves as the Statewide Grassroots Coordinator for Santorum for President, P.O. Box 37, Verona, PA 15147.

On Friday, February 17, Palazzo Grande, 54660 Van Dyke, Shelby Twp., MI 48316, a Michigan corporation, donated space for a Santorum for President rally organized by Clark and sponsored by the Michigan Faith and Freedom Coalition.

These facts are detailed in Detroit News articles of February 20 and 23, 2012 attached.

**II. Violations**

**A. Illegal Corporate Contributions to Santorum for President**

Corporations are forbidden from contributing to federal candidates under 2 U.S.C. Section 441b.

By sponsoring the Santorum rally, MFFC made an illegal in-kind contribution of its corporate resources to Santorum for President. By donating space for the rally, Palazzo Grande made an illegal in-kind contribution of its corporate resources to Santorum for President.

**B. Coordination Between MFFC and Santorum for President Resulting in Illegal Corporate Contributions**

Coordination is defined in relevant part in federal regulations:

**Subpart C-Coordination**

**§ 109.20 What does "coordinated" mean?**

(a) *Coordinated* means made in cooperation, consultation or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or a political party committee. For purposes of this subpart C, any reference to a candidate, or a candidate's authorized committee, or a political party committee includes an agent thereof.

(b) Any expenditure that is coordinated within the meaning of paragraph (a) of this section, but that is not made for a coordinated communication under 11 CFR 109.21 or a party


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coordinated communication under 11 CFR 109.37, is either an in-kind contribution to, or a coordinated party expenditure with respect to, the candidate or political party committee with whom or with which it was coordinated and must be reported as an expenditure made by that candidate or political party committee, unless otherwise exempted under 11 CFR part 100, subparts C or E.

11 CFR Section 109.20 (emphasis added).

Under the emphasized portions of the regulation, Clark was an agent of Santorum for President as its Michigan Statewide Grassroots Coordinator. Clearly then, because Clark also simultaneously serves as President of MFFC, all of MFFC's expenditures in connection with the election for President, such as the recent Michigan Republican presidential primary election, are and were being done in "cooperation, consultation or concert with, or at the request or suggestion of" Santorum for President.

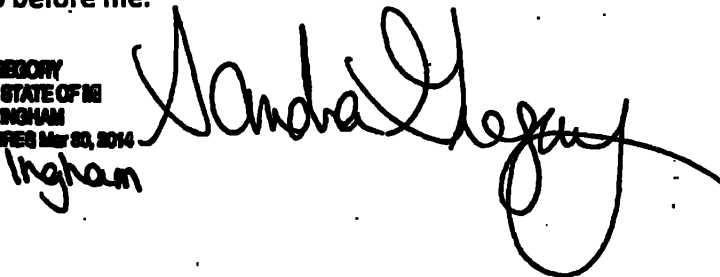
Because all of MFFC's expenditures were coordinated with Santorum for President, those expenditures were in-kind contributions to Santorum for President. Finally, because MFFC is a corporation, those in-kind contributions to Santorum for President were illegal.

  
Joe DiSano  
(address)

Pottsville MI 48076

Signed and sworn to before me.

SANDRA GREGORY  
NOTARY PUBLIC, STATE OF MI  
COUNTY OF INGHAM  
MY COMMISSION EXPIRES MAR 23, 2014  
ACTING IN COUNTY OF

  
Ingham

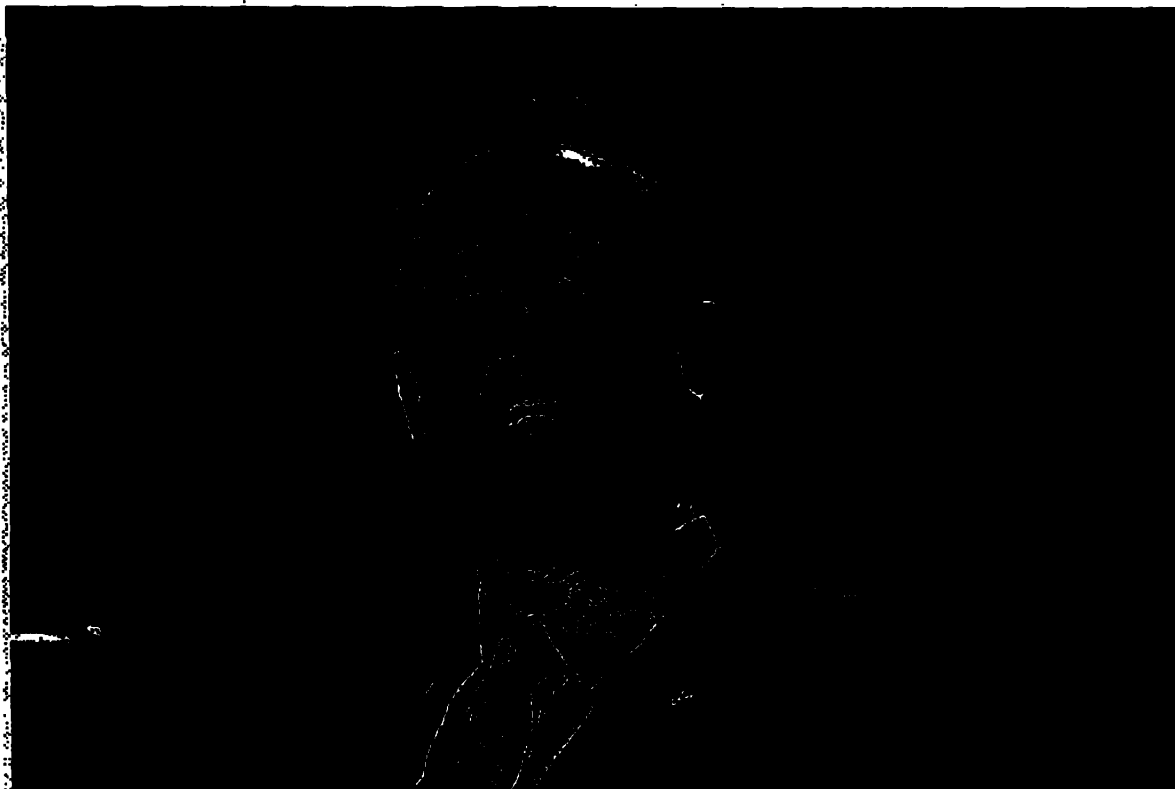
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# Michigan Santorum volunteer under fire after rally

Concerns raised about campaign coordinator for Mich.

- BY MARISA SCHULTZ
- THE DETROIT NEWS

- 7 COMMENTS



Santorum )

Questions have been raised about whether Rick Santorum's Michigan campaign coordinator has a "serious" conflict of interest and has potentially violated federal campaign rules.

Glenn Clark, president of the Michigan Faith and Freedom Coalition who recently became the volunteer coordinator in Michigan for Santorum, organized a packed rally Friday for Santorum in Shelby Township

One of the rally's sponsors was the Michigan Faith and Freedom Coalition, a nonprofit 501(c)(4) organization that promotes socially conservative values of faith, marriage and protecting the dignity

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Also, they directed him to invite all the other candidates to the coalition-sponsored event. Marx said they never heard back from Clark and "assumed he did not" listen.

One Lansing-area Democrat is lodging a complaint against Clark with the Federal Election Commission and the Internal Revenue Service for alleged violations of election law and the group's tax exempt status.

"I was shocked he came out in a leadership position with the Santorum campaign given his role with the" coalition, said Joe DiSano of Pottsville, a Democratic political consultant, who believes Clark's role puts the nonprofit status of the coalition at risk and it could be subject to fines by the FEC.

If the complaint falls under the FEC purview, the commission has to vote first to initiate an investigation. Under federal laws, corporations are prohibited from making contributions of money or anything of value to a candidate, including expenditures for communications that are made in contact with the candidate.

If violations are found, fines could be levied.

If someone is working in a dual capacity for the campaign and a nonprofit that's not supposed to coordinate strategy, what's preventing the person from passing along the information that's prohibited under the law? said Kathy Kiely of the Sunlight Foundation.

"It's created the appearance of a potential impropriety," said Kiely, managing editor at the nonpartisan organization that promotes government openness and transparency.

"I can see why the Faith and Freedom Coalition would be concerned," she added.

Friday's rally was sponsored by the Michigan Faith and Freedom Coalition, the Macomb County Republican Party, Metropolitan Detroit Freedom Coalition Tea Party, Romeo Area Tea Party and the Southeast Michigan 9.12 Tea Party, according to a news announcement sent out by Clark.

It noted, "sponsorship does not imply endorsement."

The event drew about 1,500 people and Clark introduced himself as president of the coalition and Santorum backer.

Paul Welday, a GOP political consultant, said Clark's role with the campaign is "problematic," especially for the Faith and Freedom Coalition. He questions whether the mailing list of the nonprofit would be put to use for Santorum.

#### **'Deserves a second look'**

"I think it's probably a little more cozy than it should be under federal campaign law," said Welday, who's not affiliated with a presidential campaign but personally supports Romney. "It raises enough concern; it deserves a second look."

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## The Detroit News

FEBRUARY 23, 2012

# Group pushing for Santorum's Mich. campaign coordinator to quit post

BY MARISA SCHULTZ / THE DETROIT NEWS

The national Faith and Freedom Coalition is pushing for Rick Santorum's state campaign coordinator to step down from his post with its Michigan affiliate over concerns about violations to federal election law.

Gary Marx, executive director of the national group, recommended the Michigan board place president Glenn Clark on an immediate leave of absence pending an internal investigation.

The Detroit News reported this week Clark is facing a complaint with the Federal Elections Commission over allegations his work with Michigan Faith and Freedom Coalition and with Santorum's campaign violates campaign law that prohibits non-profits from donating to campaigns and coordinating communications with them.

Clark has denied his dual roles violate any rules. He declined to comment Wednesday about the recent recommendation he step down.

The national Faith and Freedom Coalition, a conservative non-profit, has chosen not to endorse a candidate and invites all candidates to its functions. The Michigan affiliate sponsored a rally for Santorum last Friday in Shelby Township that Clark organized. The banquet hall space was donated for the event at no charge.

"We are not paying a dime for today," Clark said at the time. "How is that possible? These people love Rick Santorum. They like me. But they love him."

The national group believes invitations should have gone out to other candidates for the Friday event.

"An invitation will be going to the (Newt) Gingrich, (Mitt) Romney, and (Ron) Paul campaigns from the national office inviting them to speak on a Michigan-only tele-town hall with FFC supporters across the state prior to the primary election," Marx said.

The telephone town hall will be Saturday afternoon with Gingrich, Romney and national chairman Ralph Reed. All the candidates were invited.

The complaint with the FEC is expected to be filed this week by Democratic strategist Joe DiSano, who believes Clark's role violates campaign rules and could put the tax status of the non-profit in jeopardy.

Santorum's campaign has batted down concerns over Clark's position, saying he's a volunteer with the campaign who is expressing his individual liberty in supporting the former Pennsylvania senator.

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