

State of Michigan 54B District Court East Lansing, State of Michigan	AFFIDAVIT IN SUPPORT OF COMPLAINT	Case No: 2022-0338639-A District: Circuit:
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THE COMPLAINING WITNESS, ON INFORMATION AND BELIEF, SAYS:

1. Affiant, Special Agent Robert Menard states the following facts. Affiant is a Special Agent with the Michigan Department of Attorney General's Criminal Investigations Division and has been employed as a law enforcement office for thirty-three years. Affiant is currently assigned to the Major Case Section of the Criminal Division. The Affiant has successfully completed the Wayne County Regional Police Academy and has received specialized training in violent crimes, homicide, robbery, Arson Investigation, fugitive apprehensions, financial crimes, narcotics investigations, and Drug Trafficking Organization Conspiracy Investigations. Furthermore, Affiant has over 20 years of specialized investigative experience and has been involved in multiple complex criminal investigations.
2. Affiant states that in January of 2022, he along with other special agents of the Michigan Department of Attorney General and detectives with the Michigan State Police were assigned to investigate allegations made by Rebecca Chatfield, the sister-in-law of former Speaker of the Michigan House of Representatives Lee Chatfield, for misappropriation of non-profit and Political Action Committee money tied to Lee Chatfield when he was an elected public official in Michigan. Rebekah alleged, among other things, that Lee Chatfield misappropriated finances that he raised for political and non-profit purposes and used them for illegal purposes. During the investigation, it became clear that Robert and Anne Minard, senior staffers for Lee Chatfield, were intimately involved in misappropriation of these funds and others.
3. In 2011, Robert and Anne Minard founded a political consulting firm, Victor Strategies. The firm specialized in campaign consulting and fund-raising. In 2013, Robert Minard was introduced to Lee Chatfield as someone who may run for political office in the future. At the time, Robert was employed as a political consultant at his firm Victor Strategies and saw Chatfield as a potential client. Two months after their initial meeting, Robert assisted with Chatfield's campaign for State Representative in the Michigan House of Representatives. Chatfield won the election. Robert and Anne Minard began working for Chatfield in his first term as a State Representative from January 2015 through December 2017.
4. Chatfield was elected for a second term, from January 2017 through December 2018, and held the position of Speaker Pro Tem. This is the number two leadership position in the Michigan House of Representatives. In Chatfield's final term, from January 2019 through December 2020, he held the position of Michigan Speaker of

the House. This is the most powerful position in the Michigan House of Representatives. Robert and Anne Minard continued to be employed in the Michigan House of Representatives throughout Chatfield's tenure in office which culminated in Robert serving as Chatfield's Chief of Staff during the time Chatfield was Speaker. Anne Minard served as Chatfield's Director of External Affairs during the time Chatfield was Speaker.

5. Throughout this tenure, Robert and Anne Minard maintained operation and ownership of Victor Strategies which contracted with Chatfield's candidate committee, Chatfield's Independent Political Action Committees (PACs), 501(C)(4) non-profits associated with Chatfield and the Michigan House Republican Campaign Committee (HRCC), as well as separate independent PACs and candidate committees not associated with Chatfield, among other clients. Additionally, Robert and Anne Minard maintained and operated their own 501(C)(4) non-profit organization named Lift Up Michigan.
6. The Michigan Campaign Finance Act defines, in part, the entities described above in the following ways:
 - **Committee:** A person that receives contributions or makes expenditures for the purposes of influencing or attempting to influence the action of the voters for or against the nomination or election of a candidate, the qualification, passage, or defeat of a ballot question, or the qualification of a new political party, if contributions received total \$500.00 or more in a calendar year or expenditures made total \$500.00 or more in a calendar year. MCL 169.203(4)
 - **Candidate committee:** A committee designated in a candidate's filed statement of organization as that individual's candidate committee. A candidate committee must be under the control and direction of the candidate named in the same statement of organization. MCL 169.203(2)
 - **Independent committee**¹: A committee, other than a political party committee, that before contributing to a candidate committee of a candidate for elective office under section 52(2) or 69(2) files a statement of organization as an independent committee at least 6 months before an election for which it expects to accept contributions or make expenditures in support of or in opposition to a candidate for nomination to or election to an elective office; and receives contributions from at least 25 persons and makes expenditures not to exceed the limitations of section 52(1) in support of or in opposition to 3 or more candidates for nomination to or election to an elective office in the same calendar year. MCL 169.208(3)

¹ Although not defined explicitly in the MI Campaign Finance Act, Independent Committees are referred to in campaign finance filings as PACs.

- **Person:** A business, individual, proprietorship, limited liability company, firm, partnership, joint venture, syndicate, business trust, labor organization, company, corporation, association, committee, or any other organization or group of persons acting jointly. MCL 169.211(2)
7. The MI Department of State Bureau of Elections sends correspondence to any Committee that files a Statement of Organization that identifies itself as an Independent Committee. The boilerplate language of the correspondence indicates that an Independent Committee may give the maximum contribution amounts per election cycle after the criteria listed in MCL 169.208(3) is met.
 8. The MI Campaign Finance Act governs responsibilities for committees, in part, through a multitude of statutes:
 - MCL 169.222 states that “A committee treasurer or other individual designated on the statement of organization is responsible for the committee’s record keeping, report preparation, or report filing shall keep detailed accounts, records, bills, and receipts as required to substantiate the information contained in a statement or report filed pursuant to this act or rules promulgated under this act.
 - MCL 169.233(10) states that “if a candidate, treasurer, or other individual designated as responsible for a committee’s record keeping, report preparation, or report filing knowingly files an incomplete or inaccurate statement or report required by this section, that individual is subject to a civil fine of not more than \$1,000.00.”
 - MCL 169.243 states that “an expenditure shall not be made, other than for overhead or normal operating expenses, by an agent or an independent contractor, including an advertising agency, on behalf of or for the benefit of a person unless the expenditure is reported by the committee as if the expenditure were made directly by the committee, or unless the agent or independent contractor files a report of an independent expenditure as provided in section 51. The agent or independent contractor shall make known to the committee all information required to be reported by the committee. A person who knowingly is in violation of this subsection is guilty of a misdemeanor and shall be punished by a fine of not more than \$1,000.00, or imprisoned for not more than 90 days, or both, and if the person is other than an individual the person shall be fined not more than \$10,000.00.
 9. The IRS.gov website provides in part numerous rules, guidelines, and regulations pertaining to operation of 501(c)(4) non-profit social welfare organizations:
 - To be tax-exempt as a social welfare organization described in Internal Revenue Code (IRC) section 501(c)(4), an organization must not be organized for profit and must be operated exclusively to promote social welfare. The

earnings of a section 501(c)(4) organization may not inure to the benefit of any private shareholder or individual.

- To be operated exclusively to promote social welfare, an organization must operate primarily to further the common good and general welfare of the people of the community (such as by bringing about civic betterment and social improvements).
- Seeking legislation germane to the organization's programs is a permissible means of attaining social welfare purposes. Thus, a section 501(c)(4) social welfare organization may further its exempt purposes through lobbying as its primary activity without jeopardizing its exempt status.
- The promotion of social welfare does not include direct or indirect participation or intervention in political campaigns on behalf of or in opposition to any candidate for public office. However, a section 501(c)(4) social welfare organization may engage in some political activities, so long as that is not its primary activity.
- Every organization exempt from federal income tax under IRC section 501(a) must file an annual information return, form 990, except in part: An exempt organization (other than a private foundation) that normally has annual gross receipts of \$50,000 or less and therefore is ineligible to file an annual election Form 990-N instead of an annual information return.

10. **Peninsula Fund (PF)** is a 501(c)(4) that was incorporated in and around July 2017 by a law firm. Affiant states that records and interviews indicate after the Peninsula Fund was created, it was used as a tool to predominately fund activities related to Lee Chatfield's political office. A Peninsula Fund Board of Directors' Consent Resolution dated June 30, 2017, lists Anne Minard as President, Becky Boyce as Vice-President, Jill Larder as Secretary/Treasurer, and Renae Moore as Assistant Secretary/Treasurer. The PF articles of incorporation, in part, states the President shall be the principal executive officer of the Corporation and, subject to the control of the Board of Directors, shall in general supervise and control all of the business and affairs of the Corporation. On February 1, 2019, a Board of Directors' Consent Resolution was approved authorizing execution of a Contract for Services between the Peninsula Fund and Victor Strategies for Victor Strategies to serve as consultant.

11. At the time of the Peninsula Fund incorporation, Renae Moore served as a Government Solutions Senior Compliance Specialist with the law firm that incorporated the Peninsula Fund. She maintained this role throughout the existence of the Peninsula Fund which dissolved in April 2021. Renae Moore was interviewed and stated that the communication she relied upon for accurate record-keeping and reconciliation for the Peninsula Fund came from Anne Minard. Renae Moore stated that she often relied upon Anne to vet expenses charged to the

Peninsula Fund including determination on if expenses were legitimate or not. Renae Moore stated over time, especially in 2020, Anne submitted fewer and fewer receipts which made the reconciliation process extremely difficult.

12. Moore further stated that although Anne Minard submitted a resignation from the PF board in March 2019, she maintained the same role in acting as President from that time on while also being paid as a consultant. Throughout the Peninsula Fund's existence, Anne had access to bank accounts, writing checks, and otherwise coordinating and directing Peninsula Fund expenses. Board members from the PF were interviewed and globally agreed they took no active role in approving expenses, managing finances, or otherwise undertaking general oversight. Of note, a policies and procedures document, drafted by the law firm that incorporated the Peninsula Fund, from November 2018 notes in part that "PF expenditures must stay within the scope of the purposes of the entity ... expenses that fall outside the scope of the entity's purpose include dry cleaning, haircuts, personal clothing, satellite radio services, fitness memberships, and other personal expenditures that do not further the purposes of the Fund." Additionally, the document states that "all expense reimbursements and credit card reimbursements must be submitted on Fund forms and submitted with receipts for approval to the President of the Fund."
13. Form 990 tax records for the Peninsula Fund show that in the years 2018, 2019, and 2020 it listed its business address as P.O. Box 1013, East Lansing, MI 48826. This is the same address used by Victor Strategies on its invoices in 2020.
14. **Lift Up Michigan** is a 501(c)(4) incorporated in and around September 2015 by Robert Minard. From its incorporation through 2023, Lift Up Michigan was operated by Robert and Anne Minard. This included maintaining control of Lift Up Michigan banking activities, contributions, and expenditures. Records show that over the course of 2019 and 2020 approximately \$107,500 was donated from the Peninsula Fund into Lift Up Michigan. Anne Minard directed all of these donations.
15. **Protecting MI Future Fund** (PMFF) is a 501(C)(4) incorporated in and around March 2019 by a law firm. Renae Moore served in the same capacity as Compliance Specialist for the PMFF as she did with the Peninsula Fund. Renae Moore stated PMFF was controlled by the House Republican Caucus. Records indicate that Anne and Robert's firm Victor Strategies worked as a consultant for PMFF in 2019 and 2020. Emails and records show Anne coordinated caucus, networking, and outreach events for PMFF that benefited the HRCC. As part of this consultant role, Anne would submit receipts to Renae Moore for reimbursement of business expenses she allegedly incurred.
16. **Make Michigan First** (MMF) is a 501(C)(4) that was originally setup in 2003 by then Speaker of the House Rick Johnson entitled Michigan Promise II. Around 2006, the fund switched its name to MMF and became associated with fundraising for newer officeholders. Dawn Crandall, treasurer for MMF, stated MMF employed Anne Minard and Victor Strategies in 2018 and 2019 for fundraising purposes

because of their relationship with Chatfield and his leadership role in the House. Emails and records show Anne coordinated caucus, networking, and outreach events for MMF that benefited the House Republican Campaign Committee. As part of this role, Anne would submit receipts to Dawn Crandall and MMF for reimbursement of business expenses she allegedly incurred.

17. **Working Together for a Better Michigan (WTFBM)** in an independent PAC that filed its Statement of Organization in and around June 2019. The original Statement of Organization listed Shannon Huver as Treasurer. In 2020, WTFBM began fundraising and met the requirements of serving as an Independent PAC. Shannon Huver was interviewed and indicated she is Anne Minard's sister. Shannon stated Anne called her and asked her to be treasurer. Shannon asked what responsibilities that would entail, and Anne responded that she just needed to put down her name and address and that was it. Shannon stated she took no active role in the PAC and that Anne handled everything. Records show Shannon emailed PNC in and around June 2020 and authorized Anne Minard to oversee banking for WTFBM as its record keeper.
18. The following is a list of Independent PACs formed and associated with Lee Chatfield which all list Anne Minard as the Treasure of the Committee:
 - **Chatfield Majority Fund** – formed in and around August 2015
 - **Chatfield Majority Fund II** – formed in and around December 2017
 - **Chatfield Majority Fund III** – formed in and around April 2019
 - **Chatfield Majority Fund IV** – formed in and around February 2020
19. MCL 750.159i(1) provides that a person employed by, or associated with, an enterprise shall not knowingly conduct or participate in the affairs of the enterprise directly or indirectly through a pattern of racketeering activity. Furthermore, MCL 750.159i(4) states that a person shall not conspire or attempt to violate MCL 750.159i(1).
20. MCL 750.218 states in part that a person, who, with the intent to defraud or cheat makes or uses a false pretense to obtain from a person any money or personal property or the use of any instrument, facility, article, or other valuable thing or service is guilty of a crime punishable as provided in this section. MCL 750.218(8) states the values of land, interest in land, money, personal property, use of the instrument, facility, article, or valuable thing, service, larger amount obtained, or smaller amount sold or disposed of in separate incidents pursuant to a scheme or course of conduct within any 12-month period may be aggregated to determine the total value involved in the violation of this section. MCL 750.218(11) further notes that as used in this section, "false pretense" includes, but is not limited to, a false or fraudulent representation, writing, communication, statement, or message,

communicated by any means to another person, that the maker of the representation, writing, communication, statement, or message knows is false or fraudulent. The false pretense may be a representation regarding a past or existing fact or circumstance or a representation regarding the intention to perform a future event or to have a future event performed.

21. MCL 750.174 states in part that a person who as the agent, servant, or employee of another person, governmental entity within this state, or other legal entity or who as the trustee, bailee, or custodian of the property of another person, governmental entity within this state, or other legal entity fraudulently disposes of or converts to his or her own use, or takes or secretes with the intent to convert to his or her own use without the consent of his or her principal, any money or other personal property of his or her principal that has come to that person's possession or that is under his or her charge or control by virtue of his or her being an agent, servant, employee, trustee, bailee, or custodian, is guilty of embezzlement. The statute prescribes additional punishment if the victim is a nonprofit corporation or charitable organization. MCL 750.174(8) states that except as otherwise provided in this subsection, the values of money or other personal property embezzled in separate incidents pursuant to a scheme or course of conduct within any 12-month period may be aggregated to determine the total value of money or personal property embezzled. If the scheme or course of conduct is directed against only 1-person, governmental entity within this state, or other legal entity, no time limit applies to aggregation under this subsection.
22. During the investigation, it became clear that there were substantial amounts of non-profit, candidate committee, and PAC money that was being controlled and/or directed by Robert and Anne Minard. The evidence established that Robert and Anne Minard converted hundreds of thousands of dollars of this money to their own personal use by engaging in a sophisticated scheme of fraudulent reimbursements, double-billing, misrepresenting expenses, and falsifying records. In addition, records show that Anne and Robert Minard falsely reported their 2020 income tax returns by underreporting their adjusted gross income by over \$600k. The below is a factual synopsis of the information supporting these findings:

Count 1: Criminal Enterprises – Conducting

23. Being a person employed by or associated with an enterprise, to wit: Victor Strategies and/or the Peninsula Fund and/or an organization, association, other legal entity, or a group of persons associated in fact, did knowingly conduct or participate in the affairs of the enterprise directly or indirectly through a pattern of racketeering activity, consisting of two or more of the following incidents of racketeering, which had the same or substantially similar purpose, or result, or participant, or victim, or method of commission, and which amount to or pose a threat of continued criminal activity; contrary to MCL 750.159i(1)

Predicate 1

24. On or about June 15, 2018 through January 27, 2019, in the City of East Lansing, defendants ROBERT MINARD and ANNE MINARD did commit and/or aid or abet in the commission of the following offense for financial gain, to wit: did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00, contrary to MCL 750.218(4)(a).

25. The following facts are alleged in support of this predicate offense²:

- On June 6, 2018, Anne Minard submitted an email to Bret Marr (President of Make Michigan First) and Dawn Crandall (Treasurer of Make Michigan First) seeking reimbursement for costs incurred relative to an Enterprise Rental Agreement. Anne coordinated an enterprise rental for volunteers to canvass and door knock in support of HRCC caucus activities. The rental agreement is titled 2HWGRV and shows two costs: (1) total estimated charge - \$126.20 and (2) authorized payment - \$376.20. On June 7, 2018, Anne Minard was provided a check for \$376.20 from Make Michigan First with memo line RA 2HWGRV signed by Dawn Crandall. The check was subsequently deposited into Anne Minard's bank account via mobile deposit on 6/15/18. Anne's personal Chase credit card shows she incurred an expense on 6/7/18 via enterprise for \$126.20, the original total estimated charge. Anne did not return any money to Make Michigan First, thus on 6/15/20 Anne received **\$250** that she was not entitled and deposited into her own personal account.
- In July 2018, Anne submitted numerous emails to Dawn Crandall for expenses she allegedly incurred personally related to MMF work. The emails have various attachments which included credit card screenshots and receipts. Anne sent a subsequent email where she outlined all the expenses in two screenshots of a journal ledger. There were 27 different transactions that Anne outlined in the journal which added up to \$9,552.56. Anne was subsequently written a check on 7/23/2018 for \$9,552.56 from MMF that was signed by Dawn Crandall. The check was deposited into Anne's personal bank account on 7/26/2018 and then a subsequent payment of \$9,553 was made on her credit card on 7/28/18.
 - i. Two of the outlined expenses are for enterprise rental vans each costing \$628.59 on June 26, 2019. To support the costs, Anne submitted a screenshot of her Chase credit card account which showed the two expenses as costing \$628.59; however, this screenshot appeared to reflect pending charges and not the actual cost incurred.

² Affiant alleges the facts under Predicate 1 also support Count 4 in both Robert and Anne Minard's complaint.

This was because her actual Chase credit card statement for the relevant time period showed each rental actually cost \$504.78. Thus, Anne received an additional **\$247.62** for an expense she did not occur.

- ii. Records show that Anne additionally submitted receipts for eight other transactions for Subway, gas, and ice which totaled \$502.71. Peninsula Fund bank records shows that each of these expenses were covered from the Peninsula Fund and not Anne's personal accounts. Thus, based on these transactions, Anne received an additional **\$502.71** in money that was paid for by the Peninsula Fund.
- iii. Anne also submitted a \$108.47 receipt for prepaid visa cards through Marathon gas station in Levering, MI. Anne requested \$100 as part of the journal ledger for this expense. Bank records show this expense was actually incurred by Lift Up Michigan, thus Anne received **\$100** for an expense she did not incur.
- On December 14, 2018, Anne submitted an email to Brett Marr and Dawn Crandall at 3:13 p.m. which contained an invoice from the Inn at Bay Harbor for meetings held with the GOP House Leadership Conference. The invoice included receipts for rooms and banquets that were utilized during the meetings from 12/8/18-12/10/18. The total of the invoice showed a balance due of \$15,535.57. The invoice also showed that a \$500 deposit was made for the reservation on an AmEx card ending in 1009. Anne requested a reimbursement check for Robert indicating that he paid the invoice on his card. MMF wrote a check to Robert Minard on 12/21/18 for \$16,035.57. He subsequently deposited the check into the Minard's joint checking account and then made a \$16,035.57 payment on his Chase credit card. Emails show that on 12.14.18, at approximately 1:56 p.m., Anne received an email from the accounting supervisor from the Inn at Bay Harbor with the invoice that Anne subsequently sent to Bret Marr and Dawn Crandall. Anne confirmed with the employee the total amount due was \$15,535.57 per the invoice and that the deposit made on a separate 1009 card covered the \$500. On 12/18/2018, Anne emailed the employee from the Inn at Bay Harbor again and stated that a certain piece of the invoice will be put on the AmEx card on file ending in 1009. This additional amount was \$1082.88 which corresponded with one of the banquet room rentals contained in the original invoice. The employee emailed Anne back and confirmed that \$14,452.69 was owed and that the \$500 deposit and the \$1082.88 for banquet rental have been charged on the AmEx ending in 1009. Robert Minard's Chase credit card records showed a payment for \$14,452.69 to the Inn at Bay Harbor on 12/20/18. There are no credit card records for the Minards that show them making the other \$1582.88 payment. In fact, both of them have AmEx cards neither of which match the 1009 number. At this point, it is unknown who covered the cost for the deposit and the other banquet room rental. Robert however collected the full reimbursement for \$16,035.57 and made a payment on his

Chase credit card in the same amount. The Minards did not reimburse any other individuals for that payment. Thus, Robert received **\$1,582.88** for an expense he did not incur based on misrepresentations of him paying the full invoice amount.

- On January 21, 2019, Anne Minard submitted an email to Bret Marr and Dawn Crandall which contained subject line “Receipt/reimbursement” and included a JPEG image. The body of the email says: “Hi Dawn, Can I please get a reimbursement check for this print job of posters for the swearing-in lunch we put on with the Dems and Senate?” The attached receipt is from Insty Prints and is for \$533.93. The next day, 1/22/2019, Dawn Crandall wrote Anne Minard a check for \$533.93 with memo line “bi-part swearing in.” Anne subsequently deposits the check into her bank account and then makes a \$533.93 payment on her Chase credit card. Bank records show that the Peninsula Fund incurred the \$533.93 expense on 1/9/19, not Anne. Thus, Anne was not entitled to the reimbursement and instead obtained **\$533.93** for an expense she did not incur via misrepresenting who covered the cost.
- In total, from June 15, 2018, through January 22, 2019, Anne and Robert Minard were wrongfully reimbursed approximately \$3,217.14 via checks that were subsequently deposited into the Minards’ Fifth Third checking account. The facts show a repeated pattern of Anne submitting costs for reimbursement for expenses she did not incur, employees at MMF relying on these representations, MMF writing the Minards’ checks and MMF suffering loss. The separate reimbursements are aggregated because they are part of the same scheme to defraud MMF via fraudulent misrepresentations. The evidence supports including Robert into this count as an aider and abettor because he received one of the checks that was for an amount that exceeds any payment he made. Robert did not question the fact he was receiving more money than he was owed and in fact Robert subsequently deposited the check and paid off his personal credit card in full amount of the check. This comes mere days after the relevant transaction, which is \$1,582.88 less than the check, is posted to his account.
- Relevant checks deposited:
 - i. Anne Minard - \$376.20 on 6/15/18 via Fifth Third bank mobile deposit
 - ii. Anne Minard - \$9,552.56 on 7/26/18 via Fifth Third bank deposit at 1427 W Saginaw, East Lansing, MI 48823
 - iii. Robert Minard - \$16,035.57 on 12/26/18 via Fifth Third bank deposit at 1427 W Saginaw, East Lansing, MI 48823
 - iv. Anne Minard - \$533.93 on 1/27/19 via Fifth Third bank mobile deposit
 - v. **Total fraud alleged = \$3,217.14**

Predicate 2

26. On or about September 7, 2018, in the City of East Lansing, defendant ROBERT MINARD did commit the following offense for financial gain, to-wit: did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00, contrary to MCL 750.218(4)(a)

27. The following facts are alleged in support of this predicate offense:³

- In August 2018, Anne and Robert Minard, among others, attended a seminar in Hawaii which was partially hosted by the group Institute for Research on Presidential Elections – a group that advocates for the National Popular Vote. Following the trip, Robert Minard submitted an expense reimbursement form to Larry Lessler from the Institute for Research on Presidential Elections seeking reimbursements for two flights (him and Lee Chatfield) as well as two taxi's and one parking receipt. The total for the reimbursement was \$2,563.98.
- Bank records and receipts show that four of these expenses were paid of Peninsula Fund money and one expense was paid out of Lift Up Michigan funds. Robert however collected the full reimbursement, and subsequently deposited the check into the Minard MSUFCU account. The facts show Robert submitted an expense reimbursement for expenses he did not incur, IRPE relied on those representations, issued him a check, and suffered loss because of the reliance. Robert did not refund the Peninsula Fund or Lift Up Michigan for the funds received.
- Relevant check deposit:
 - i. Robert Minard - \$2,563.98 via MSUFCU mobile deposit credited on 9/13/18 to MSUFCU branch located at 3777 West Rd., East Lansing, MI
 - ii. **Total fraud alleged = \$2,563.98**

Predicate 3

28. On or about June 12, 2019 through December 11, 2019, in the City of Lansing, defendant ANNE MINARD did commit the following offense for financial gain, to wit: being an agent of the Peninsula Fund, a non-profit corporation or charitable organization, did convert to her own use, money of the Peninsula Fund, having a value of more than \$1,000.00 but less than \$20,000, that came into the defendant's

³ Affiant alleges the facts under Predicate 2 also support Count 5 in Robert Minard's complaint.

possession or under defendant's charge or control by virtue of her relationship with the principal; contrary to MCL 750.174(5)(c);

29. The following facts are alleged in support of this predicate offense:⁴

- On June 11, 2019, Anne Minard submitted two reimbursement forms to Renae Moore detailing costs for reimbursement related to the Detroit Regional Chamber Conference, business, and policy meetings. On one reimbursement, she requested a grand total of \$1,796.26 for expenses allegedly incurred and the other reimbursement form she requested \$5,798.73 for expenses allegedly incurred. Anne concurrently wrote herself a check for \$7,594.99 for all the costs.
 - i. The first reimbursement form for \$1796.26 included three expenses that Anne did not pay for herself. One is for \$9.09 at Bigby coffee which is paid for from Lift Up Michigan funds; one is for \$39.87 at Kewpee Burgers which is paid for on the Peninsula Fund debit card; and one is \$392.20 at Chick-Fil-A which is paid for on an unknown card number. Emails showed that the day before the Chick-Fil-A purchase, Anne Minard emailed the order confirmation to Chris Horack, a lobbyist for Comcast, and listed the names of numerous state legislators. Thus, it appears that the lobbyist firm covered the expense and Anne was emailing the names of legislators, as lobbyists have reporting requirements for purchasing food and beverage for elected officials. In total, the evidence supports the fact Anne was reimbursed **\$441.16** for expenses paid from other entities.
 - ii. The second reimbursement form for \$5,798.73 outlined eleven different transactions that Anne allegedly incurred at the Inn at Bay Harbor for hotel rooms for herself and Robert Minard, Lee Chatfield, and various Chatfield staffers. Anne submitted hotel invoices for each room to justify the reimbursement and highlighted the various costs for each room and included those on the reimbursement form. The largest expense is \$2,945.03 which was an advance deposit that Anne put down for the rooms. The key here however is that the hotel invoices showed that the \$2945.03 deposit was used by the hotel as an advance deposit on each of the rooms that Anne booked. Anne made it appear that she covered all these different costs by submitting multiple different hotel invoices even though they show the same expenses being covered. When comparing the reimbursement amounts with Anne's actual Chase credit card bank statements, Anne represented that she paid \$5798.73 for everything when her actual Chase credit card statement showed that she only incurred \$2,731.07 in expenses.

⁴ Affiant alleges the facts under Predicate 3 also support Count 5 in Anne Minard's complaint.

Anne falsely represented she paid much more than she did. In total, Anne received \$3,067.66 from the PF for costs she did not incur. Thus, in total Anne received **\$3,508.82** for expenses she did not incur via a check she concurrently writes herself on the same day, 6/11/19, as the emails to Renae Moore.

- On November 4, 2019, Anne emailed Renae Moore with memo line “PF Reimbursement” and in the body of the email notes, in part, “Check 1127 - \$702.81 reimbursement ... See attached form and receipts.” The reimbursement form contained nine transactions which add up to \$702.81. Records show that four of the nine transactions were paid for using Lift Up Michigan funds. These expenses totaled \$447.62 thus Anne received **\$447.62** for expenses she did not incur via a check she concurrently wrote herself at the time of the emails.
- On December 2, 2019, and December 10, 2019, Anne submitted two emails to Renae Moore for Enterprise rental agreements alleging reimbursement for car rental for Chatfield business meetings. She attached the agreements which showed total authorized charges of \$278.28 and \$289.49. Anne wrote herself a check on 12/10/19 for \$567.77 from the PF which was the total of the two authorized charges. Anne’s Chase credit card showed she actually spent \$223.27 on the Enterprise rentals which was the total estimated charges. Thus, Anne reimbursed herself an additional **\$344.50** for expenses she did not incur.
- In sum, Anne submitted reimbursement forms, emails, and receipts for numerous transactions for expenses she did not incur. Unlike the previous factual scenarios, where Robert and Anne are submitting reimbursements and a separate entity is writing them a check, Anne submits the reimbursement forms and unilaterally writes the checks to herself because she has control of PF banking activities. The records do not indicate Renae Moore approved the reimbursements as evidenced by the fact Anne wrote the checks at the same time, she submitted the reimbursements. Renae Moore served solely in a record keeping function for these reimbursements. Thus, Anne used her position as an agent of the Peninsula Fund to convert its funds to her own use when she was not otherwise entitled to them. The expenses are aggregated because it follows the same scheme employed to obtain the funds and the sole victim is the Peninsula Fund. The facts show Anne’s repeated misrepresentations support an intent to defraud.
- Relevant checks deposited:
 - i. Anne Minard – \$7,594.99 on 6/12/19 via Fifth Third deposit at 500 E Michigan Ave, Suite 100, Lansing, MI 48912
 - ii. Anne Minard - \$702.81 on 11/5/2019 via Fifth Third mobile deposit
 - iii. Anne Minard - \$567.77 on 12/11/19 via Fifth Third mobile deposit

iv. Total alleged fraud = \$4,300.94

Predicate 4

30. On or about August 13, 2019 through October 23, 2019, in the City of Okemos, defendant ANNE MINARD did commit the following offense for financial gain, to-wit: did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00, contrary to MCL 750.218(4)(a);

31. The following facts are alleged in support of this predicate offense:⁵

- In August and October 2019, Anne submitted multiple reimbursement forms to Renae Moore to receive reimbursement checks from the **Protecting MI Future Fund** for costs allegedly incurred related to House GOP caucus activities, meetings, and events.
 - i. The first reimbursement form was submitted on 8/6/19 for a total of \$4599.17. Anne subsequently received and deposited this check. This included two Enterprise rental expenses – one for \$976.16 and one for \$696.41. Records showed these are the authorized amounts put on her Chase credit card however her Chase credit card statements showed she actually spends \$726.16 on the first rental and \$596.35 on the second rental. Thus, Anne received **\$350.06** for expenses she did not incur.
 - ii. The second reimbursement check stems from two reimbursement forms that Anne submitted, one on 10/14/19 and one on 10/21/19. There were 21 transactions combined on the two reimbursement forms and that added up to \$7,561.93. Anne subsequently received a check from PMFF, written and signed by Renae Moore, for this amount. Anne deposited the check and immediately made a \$7562 payment on her Chase credit card. Banking records showed that Anne requested reimbursement for **\$1,366.76** on these forms for expenses she did not incur. These expenses were paid for by Lift Up Michigan and/or included an improper reimbursement amount.
- In total, Anne received \$1,716.82 from the two checks for expenses she did not incur. She received this money by submitting misrepresented reimbursement forms to Renae Moore and PMFF, they relied upon her representations, issued her a check, and suffered loss. Anne deposited the

⁵ Affiant alleges the facts under Predicate 4 also support Count 6 of Anne Minard's complaint.

check, did not pay back Lift Up Michigan or PMFF, and used the money to pay off her credit card.

- Relevant checks deposited:
 - i. Anne Minard - \$4,599.17 on 8/13/19 via Fifth Third Bank mobile deposit
 - ii. Anne Minard - \$7,561.93 on 10/23/19 via Fifth Third Bank deposit 4815 Okemos Rd., Okemos, MI 48864
 - iii. **Total alleged fraud = \$1,716.82**

Predicate 5

32. On or about September 24, 2019, in the City of Lansing, defendants ROBERT MINARD and ANNE MINARD did commit and/or aid or abet in the commission of the following offense for financial gain, to-wit: did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00, contrary to MCL 750.218(4)(a);

33. The following facts are alleged in support of this predicate offense:⁶

- In September 2019, Anne coordinated an order and delivery for lanyards related to the MI Republican Party and Lee Chatfield. On 9/17/19, she emailed Robert a copy of the invoice for the order which shows the cost of the lanyards to be \$4,753.26. Victor Strategies via Robert Minard created an invoice for the lanyards including the price of the lanyards plus an additional fee. The invoice also requested payment for fundraising and consulting in the amount of \$15,500. Robert sends Anne the updated Victor Strategies invoice who subsequently submits the invoice that same day to the Peninsula Fund including \$6,453 for “Lanyards for Republican Conference” as well as the fundraising consulting fee.

⁶ Affiant alleges the facts under Predicate 5 also support Count 7 in Anne Minard’s complaint and Count 6 in Robert Minard’s complaint.



VICTOR Strategies, LLC
PO Box 1013
East Lansing MI 48826
billing@victorstrategies.com

INVOICE

INVOICE #1091
DATE: SEPTEMBER 17, 2019

TO:
PENINSULA FUND

DESCRIPTION	HOURS	RATE	AMOUNT
Lanyards for Republican Policy Conference			\$6,453
Fundraising consulting			\$15,500

- In total, the invoice requested payment of \$21,953. Records show that Victor Strategies LLC. accepted payment for this invoice and then did not pay the company that charges them for the lanyards. Instead, a few months later Anne submitted the original invoice of \$4,753.26 to the Peninsula Fund, from the lanyard company, and requested that Peninsula Fund issue a check to pay the invoice. PF, via Renae Moore, subsequently pays invoice.
- In sum, the facts show that Anne and Robert Minard orchestrated a scheme to order lanyards, bill the PF for the cost of the lanyards as well as an additional fee, and then collect the money without paying the original cost of the lanyards. Instead, they resubmit the invoice a few months later and PF in essence pays for the same expense twice because the Minards double bill them. Thus, the Minards misrepresented the fact they paid for the lanyards to collect money they are not entitled to. The PF relied on this representation and paid them for an invoice for an expense the Minards did not incur.
- Relevant check deposit:
 - i. Victor Strategies - \$21,953.00 on 9/24/19 via Fifth Third bank deposit at 500 E. Michigan Ave, Suite 100, Lansing, MI 48912.
 - ii. **Total alleged fraud amount = \$4,753.26**

Predicate 6

34. On or about July 6, 2020 in the City of Lansing, defendant ANNE MINARD did commit the following offense for financial gain, to-wit: did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00, contrary to MCL 750.218(4)(a);

35. The following facts are alleged in support of this predicate offense:⁷

- On June 6, 2020, Chatfield and his senior staff have a dinner at Vernales restaurant in Harbor Springs, MI. The dinner cost \$2,160.87 per receipt. The dinner is paid for on the Peninsula Fund debit card. Three weeks after the dinner, on 6.29.2020, Anne Minard received a check from the lobbyist firm Public Affairs Associates for \$2,160.87. The check is written from the PAA address located at 120 N. Washington Square, Suite 1050, Lansing, MI 48933. The memo line of the check said: “Vernale’s reimb 6/6/20” Anne subsequently deposits the check into the Minards checking account and then made a \$2,160.87 payment on her Chase credit card. Thus, the evidence shows Anne represented to PAA that she incurred the cost of the Vernales dinner, they relied on her representation and paid her for the dinner, she accepted the check, deposited it, and kept the money without paying the Peninsula Fund back. Thus, Anne receives **\$2,160.87** for costs she did not incur and is not otherwise entitled to.
- Relevant check deposit:
 - i. Anne Minard - \$2,160.87 on 7/6/2020 via Fifth Third mobile deposit.
 - ii. **Total alleged fraud amount = \$2,160.87**

Predicate 7

36. On or about July 6, 2020 in the City of East Lansing, defendants ROBERT MINARD and ANNE MINARD did commit and/or aid or abet in the commission of the following offense for financial gain, to wit: did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00, contrary to MCL 750.218(4)(a);

37. The following facts are alleged in support of predicate offense:⁸

- In late June 2020, Anne submitted a batch of hotel invoices to Renae Moore for hotel costs that Robert Minard covered on his personal credit card for a policy workshop at the Inn at Bay Harbor. The hotel costs added up to \$15,770.06 and are supported via the invoices and Rob’s credit card statements. On July 1, 2020, a few days after submitting the hotel invoices, Anne sends an email to Renae Moore that said “they didn’t give me the receipt this is the cc transaction for dinner” ... the email contained a

⁷ The facts alleged under Predicate 6 also support Count 8 in Anne Minard’s complaint.

⁸ The facts alleged under Predicate 7 also support Count 9 in Anne Minard’s complaint and Count 7 in Robert Minard’s complaint.

screenshot for a \$2,783.24 expense at the Depot Dining Club on 6/6/20. Records obtained from PF showed that Renae Moore added the hotel invoices together as well as the \$2,783.24 depot dining club expenses and then issued a check to Robert Minard for **\$18,553.30** on 7/2/2020. Concurrent Chase credit card records for Anne Minard showed that Robert did not in fact incur the Depot Dining Club expense, Anne did. On 6/14/20, Anne made an online payment of \$12,090.63 on her Chase credit card which covered the entire Depot Dining Club dinner expense she incurred on 6/6/20. This \$12,090.63 payment was made using Peninsula Fund money. Thus, Robert is reimbursed \$2,783.24 for the depot dining club expense as part of the \$18,553.30 check even though it had already been paid for using PF money. This check is subsequently deposited by Robert into his and Anne's MSUFCU money management savings account.

- In sum, the evidence shows that Anne represented to Renae Moore and the Peninsula Fund that Robert incurred the Depot Dining Club expense when he did not. Anne incurred the expense and already used separate PF money to pay for it. Renae Moore relied on this representation and issued a check to Robert Minard for an amount including the \$2,783.23. Robert deposited the check into a joint MSUFCU account with Anne Minard and no money was provided back to the Peninsula Fund. Robert aided and abetted the wrongful reimbursement via accepting the check and depositing it knowing he did not in fact incur the expense. Thus, the Minards double bill the Peninsula Fund for the same expense to collect an additional \$2,783.23.
- Relevant check deposit:
 - i. Rob Minard - \$18,553.30 on 7/6/20 via e-deposit ... amount credited to account at 3777 West Rd., East Lansing, MI MSUFCU branch.
 - ii. **Total alleged fraud = \$2,783.24**

Predicate 8

38. On or about October 1, 2019 through January 1, 2021 in the City of Lansing, defendant ANNE MINARD did commit the following offense for financial gain, to-wit: being an agent of the Peninsula Fund, a non-profit corporation or charitable organization, did convert to her own use, money of the Peninsula Fund, having a value of more than \$1,000.00 but less than \$20,000, that came into the defendant's possession or under defendant's charge or control by virtue of her relationship with the principal; contrary to MCL 750.174(5)(c);

39. The following facts are alleged in support of this predicate offense:⁹

⁹ Affiant alleges the facts under Predicate 8 also support Count 10 in Anne Minard's complaint.

- Starting in October 2019 and going through December 2020, Anne Minard regularly made unilateral payments on her personal Chase credit card from the Peninsula Fund online banking account. The payments totaled well over \$100k during this period. For some of the payments, Anne submitted copies of her credit card statements to Renae Moore where certain transactions were crossed off. She represented that the crossed off transactions were personal expenses, and the remaining expenses were business expenses. Even while submitting these statements, a simple accounting of the crossed off statements compared to payments from the PF showed that personal expenses (per Anne's own admission) were covered using non-profit funds.
- Eventually, in and around spring 2020 Anne stopped submitting credit card statements or receipts for business expenses and just started making unilateral payments on her Chase credit card. It became clear throughout summer 2020 and into fall 2020 that Anne covered tens of thousands of dollars in personal expenses using non-profit money.
- Affiant states that in December 2020, Minard directed money from the Peninsula Fund to make the following payments to her personal Chase credit card:

\$4,000.00	12/4/2020
\$4,859.88	12/5/2020
\$20,000.00	12/6/2020
\$16,696.28	12/17/2020

Total \$45,556.16

- Affiant further states that during the months of November and December of 2020 Anne Minard made the following purchases on her Chase credit card that were personal in nature and payments to the credit card account from the Peninsula Fund covered these expenses. The transactions are listed below:

Date	Purchase	Amount
11.28.20	Spanx Inc	\$391.76
12.3.20	Lululemon.com	\$41.34
12.6.20	Lululemon.com	\$187.62
	Sparrow Heath	
12.8.20	Lansing	\$25.08
12.8.20	Lilly Pulitzer	\$1,382.24
12.10.20	AAA Insurance	\$119.34
12.12.20	Paypal Gucci	\$7,806.90
12.12.20	Paypal Hugo Boss	\$111.30
12.13.20	Lululemon.com	\$311.64

12.15.20	Target.com	\$195.99
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Total		\$10,573.21
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- Unlike the previous instances which involved submitting misrepresented expenses and receiving checks, now in December 2020, Anne unilaterally has taken to making payments directly from the Peninsula Fund bank account onto her personal credit card. This scheme was separate from the other fraud related to the Peninsula Fund, as no checks were written and instead this was Anne using her position as agent of the Peninsula Fund to convert non-profit money into her own personal use. Anne was not entitled to taking this money and records indicate the expenses were personal in nature supporting the element of intent to defraud given the Peninsula Fund rules and regulations against personal expenditures. Thus, the evidence supports charging Anne with embezzlement over \$1k from a non-profit organization.

Predicate 9

40. On or about September 23, 2020 through October 14, 2020, in the City of East Lansing, defendants ROBERT MINARD and ANNE MINARD did commit and/or aid or abet in the commission of the following offense for financial gain, to wit: did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$20,000 or more but less than \$50,000; contrary to MCL 750.218(5)(a);

41. The following facts are alleged in support of this predicate offense:¹⁰

- Working Together for a Better Michigan (WTFBM) in an independent PAC that filed its Statement of Organization in and around June 2019. The original Statement of Organization listed Shannon Huver as Treasurer and Anne Minard as designated recordkeeper. In 2020, WTFBM began fundraising and met the requirements of serving as an Independent PAC. Shannon Huver was interviewed and indicated she is Anne's Minard's sister. Shannon stated Anne called her and asked her to be treasurer. Shannon asked what responsibilities that would entail, and Anne responded that she just needed to put down her name and address and that was it.
- Shannon stated she took no active role in the PAC and that Anne handled everything. Records show Shannon emailed PNC in and around June 2020 and authorized Anne Minard to oversee banking for WTFBM as record keeper. Records also show Anne Minard handled all fundraising, check-

¹⁰ Affiant alleges the facts under Predicate 9 also support Count 11 in Anne Minard's complaint and Count 8 in Robert Minard's complaint.

writing, and submission of campaign finance documents relative to WTFBM. Although Anne Minard maintained these responsibilities, campaign finance filings continued to list Shannon Huver as Treasurer through 2021.

- Records show WTFBM was created to fundraise and support HRCC races in the November 2020 general election for the MI State House. In total, the PAC raised over 1.5 million dollars of which 1.25 million came from the various Chatfield Majority Fund PACs via checks written by Anne Minard.
- A large portion of the WTFBM spending was on political mailing literature that went to the company WAM print. WAM created the literature, submitted an invoice to Victor Strategies (who acted on behalf of WTFBM), and then sent out the mailers to support various House GOP candidates. To pay for the mailing, WTFBM, via Anne Minard, wrote WAM print four separate checks:
 - i. **9/12/20 - \$300k**
 - ii. **9/30/20 - \$180k**
 - iii. **10/8/20 - \$102k**
 - iv. **10/15/20 - \$115k**
- Affiant interviewed employees from WAM print who stated that the checks were cashed and served as deposits for future mailing costs. Employees from WAM print indicated that of all the accounts they handled, only Victor Strategies paid up front deposits. WAM provided investigators a spreadsheet showing how the money was deposited and then invoices would be subtracted from the deposit. WAM employees stated all invoices went through Robert Minard and he coordinated mailers, expenses, and generally handling business activity between WAM, WTFBM, and Victor Strategies.
- Records show that the above-referenced deposits totaling \$697k were used to pay for approximately 60 invoices submitted from WAM print to Victor Strategies. Of those 60 invoices, three of them were for sets of mailers for Julie Alexander for State Rep – a candidate committee. The invoices showed that WTFBM covered approximately \$16,526.14 in mailing costs for campaign literature associated with Julie Alexander for State Rep. Records showed that Victor Strategies had a contractual agreement with Julie Alexander for State Rep which included being paid for mailing. Records also showed that in September and October 2020, Victor Strategies charged Julie Alexander approximately \$26,876 for mailing costs relative to the WAM invoices. Victor Strategies collected the money and deposited it into its business account.

- The facts show that Victor Strategies represented to Julie Alexander it incurred certain mailing costs and in turn charged Alexander for those mailing costs, when WTFBM covered the mailings. Alexander relied on those representations and paid Victor Strategies for mailing costs they never incurred. This is another situation where Victor Strategies was submitting an invoice for an expense they claim to incur when they did not. Alexander was interviewed and indicated she relied upon their invoices to pay the amounts. In total, Victor Strategies collected **\$16, 526.14** for mailing costs which are paid for by WTFBM from Julie Alexander for State Rep.
- The same scheme occurred for the Friends of Jim Lilly candidate committee. WAM produced a set of mailers for him that are covered using WTFBM deposits. The total cost of the mailings was \$6,988.32. Victor Strategies submitted an invoice to Jim Lilly for the cost of the mailing. He paid the invoice to Victor Strategies not knowing that a separate entity had already covered the cost of his mailers. Thus, Victor Strategies was falsely representing that they were receiving payment for mailers when the payment had already been made by a separate entity. Jim Lilly's campaign committee relied on this representation and suffered loss in the amount of **\$6,988.32**.
- In sum, Victor Strategies collected \$23,514.46 in mailing costs from the Alexander and Lilly campaigns, notwithstanding what they collected as separate profit, even though the mailing costs were covered by WTFBM. Each of these entities suffered loss based on fraudulent representations contained in invoices made by Victor Strategies i.e., Anne and Robert Minard. As a result of those representations, VS received more than \$20k in improperly paid funds.
- Relevant deposited checks:
 - i. 9/23/2020 - \$27500 Victor Strategies via Fifth Third deposit at 1427 West Saginaw, East Lansing, MI 48823
 - ii. 10/14/2020 – \$14,376.60 Victor Strategies via Fifth Third deposit 1427 West Saginaw, East Lansing, MI 48823
 - iii. 10/14/2020 - \$9,988.32 Victor Strategies via Fifth Third deposit at 1427 West Saginaw, East Lansing, MI 48823
 - iv. **Total alleged fraud = \$23,514.16**

Predicate 10

42. On or about October 22, 2020 through November 12, 2020, in the City of East Lansing, defendants ROBERT MINARD and ANNE MINARD did commit and/or aid or abet in the commission of the following offense for financial gain, to wit: being

an agent of Working Together for a Better MI, did convert to his/her own use, money of Working Together for a Better Michigan, having a value of \$100,000 or more, that came into defendants' possession or under the defendants' control by virtue of his/her relationship with the principal; contrary to MCL 750.174(7).

43. The initial alleged facts discussed in predicate 9 are herein incorporated by reference. The additional alleged facts supporting this predicate offense are as follows:¹¹

- Records from WAM, including the spreadsheet provided to investigators, showed that WAM submitted 60 invoices to Victor Strategies between 9/23/20 and 10/21/20. WAM subtracted the cost of each of these invoices from the initial deposit amounts from WTFBM. The deposits totaled \$697,000.00 as noted above.
- As of 10/22/20, there was a remaining balance of \$151,658.87 based on the deposits previously made minus the costs of all the invoices. On the same day, 10/22/20, WAM print issued a check to Victor Strategies for the remaining balance amount of \$151,658.87.
- Because WTFBM is an independent PAC, they are required to file quarterly campaign finance statements. On 10/26/20, WTFBM submitted to the Bureau of Elections its October 2020 Quarterly Campaign Statement which covered the time period of 7/21/20 to 10/20/20 and detailed WTFBM's purported expenses during the same time period. WTFBM reported to the Bureau of Elections that it spent \$697,000.00 in campaign expenses to WAM print on behalf of various candidates. A copy of the condensed version of relevant expenses that WTFBM reported spending to WAM printing is below:

"Expense" date:	Amount:	Candidate:
9.3.20	104325.45	Roth - 104
9.3.20	102531.01	Tisdell - 45
9.3.20	101080.81	Ptashnik - 19
9.3.20	100840.45	Glenn - 98
9.3.20	98333.2	Berman - 39
9.3.20	65056.9	Turner - 38
9.3.20	55502.1	Beson - 96
9.3.20	40230.08	Johnson - 72
9.3.20	29,100	Wendzel - 79
	697,000	

¹¹ Affiant alleges the facts under Predicate 10 also support Count 12 in Anne Minard's complaint and Count 8 in Robert Minard's complaint.

- The \$697,000 amount is the exact amount of the four WTFBM checks paid to WAM printing however the fact that Victor Strategies collected \$151,658.87 is omitted. The campaign finance document is an entirely false representation of the actual costs that WTFBM paid to WAM. The below table represents what WTFBM actually paid for the 60 invoices using records from WAM:

Candidate:	Wam Cost
Roth	74,183.25
Tisdell	45,348.49
Ptashnik	70,482.61
Glenn	56,410.85
Berman	58,719.84
Turner	55,373.90
Beson	28,419.69
Johnson	41,844.44
Wendzel	34,589.40
Alexander	16,526.14
Lilly	6,988.32
Poe	56,454.20
	545,341.13

- The records show that Anne Minard via WTFBM was submitting inaccurate campaign finance reports to the Bureau of Elections to cover up the fact that Victor Strategies was paid almost \$152k. Certain campaign mailers were completely omitted while the costs for others are completely inaccurate. Overall, the campaign finance report was submitted in a way so that it masked the fact any payment went back to Victor Strategies.
- Following the initial 60 invoices, WAM print submitted three more invoices to Victor Strategies for political mailers. One was for Bryan Posthumus dated 10/26/20 for \$9,619.65 and one was for Timothy Beson dated 10/27/20 for \$9,473.23. Each of these was paid on Robert Minard's AmEx card with a 3% service charged added. The third invoice was for a Lee Chatfield mailer dated 12/11/20 that was also paid via Robert Minard's AmEx card for \$12,442. Victor Strategies submitted an invoice to the Peninsula Fund to cover the cost of the Chatfield mailer. Thus, in total, Robert incurred an additional \$19,665.66 in costs for invoices not paid by another entity.
- Records show that on 11/10/20, as opposed to Robert being reimbursed from WTFBM for the \$19,665.66 in costs for invoices he paid from his personal credit card, WTFBM wrote Victor Strategies a check for **\$338,762.10** with no memo line. The check was signed by Anne Minard. The subsequent January Quarterly Campaign Statement for the time period of 10/21/20 through

12/31/20, submitted on 2/1/2020, reported that WTFBM paid the following costs to WAM print:

11.10.20		48505.4	Poe - 23	
11.10.20		29128.39	Roth - 104	Oppose Dan O'Neil
11.10.20		28510.8	Beson - 96	Oppose Sarah Schulz
11.10.20		26701.11	Poe - 23	Oppose Darrin Camilleri
11.10.20		25,532.08	Tisdell - 45	Oppose Barb Anness
11.10.20		25022.1	Berman - 39	Oppose Julia Pulver
11.10.20		23900.43	Turner - 38	Oppose Kelly Breen
11.10.20		22750.75	Ptashnik - 19	Oppose Laurie Pohutsky
11.10.20		20200.95	Johnson - 72	
11.10.20		18910.36	Wendzel - 79	Oppose Chokwe Pitchford
11.10.20		18575.81	Beson - 96	Oppose Brian Elder
11.10.20		18499.22	Johnson - 72	Oppose Lilly Cheng-Schulting
11.10.20		17626.5	Posthumus - 73	
11.10.20		14898.2	Beson - 96	
		338762.1		

- The campaign finance statement referenced above provides a completely inaccurate representation of the actual payments made to WAM printing from WTFBM. In fact, only two expenses reported are supported, in part, via invoices from WAM. The remaining expenses are all money that goes to Victor Strategies and are not supported via invoices.
- In total, Anne and Robert Minard paid their political consulting firm Victor Strategies approximately \$470,755.30 from WTFBM funds. Affiant believes that these payments are evidence of embezzlement. First, all contributions made to WTFBM belonged to the Independent PAC and no specific individual. Anne maintained a relationship of trust with WTFBM because she served as record keeper and had complete access/control over its accounts and funds. Robert, via his business relationship with WAM, facilitated invoices and payments which were used to justify WTFBM's expenditures. Anne and Robert converted \$470,755.30 of WTFBM money to their own use by depositing the payments into the Victor Strategies bank account and then from Victor Strategies into their personal bank account. No money was paid back to WTFBM.
- There are numerous facts that support Anne and Robert's intention to defraud WTFBM upon depositing the money into the Victor Strategies' account. To date, Affiant has located no contractual agreements between Victor Strategies and WTFBM that support the payments. Affiant has located no invoices from Victor Strategies to WTFBM that request payment for services rendered. Affiant spoke with the WTFBM treasurer, Shannon Huver, who stated she was told all she needed to do was list her name and address and Anne would take care of everything even though Shannon continued to be listed as treasurer. Finally, and most importantly, Affiant has reviewed the relevant campaign finance records which inaccurately

report payments made from WTFBM to WAM. These are campaign finance reports submitted by Anne Minard which falsely represent WTFBM's expenses to cover up the hundreds of thousands of dollars paid to Victor Strategies.

- Relevant check deposits:
 - i. 10/22/20 – Victor Strategies for \$151,658.87 via Fifth Third bank deposit at 4460 Cascade Rd., SE, Grand Rapids, MI 49546
 - ii. 11/12/2020 - Victor Strategies for \$338,762.10 via Fifth Third Bank deposit at 1427 West Saginaw, East Lansing, MI 48823
 - iii. **Total alleged fraud = \$470,755.30.**

Count 2: Criminal Enterprise – Conspiracy

44. Being persons employed by or associated with an enterprise, to wit: Victor Strategies and/or the Peninsula Fund, and/or an organization, association, other legal entity, or a group of persons associated in fact, did conspire together with one and another and/or other diverse persons unknown to knowingly conduct or participate in the affairs of the enterprise directly or indirectly through a pattern of racketeering activity, consisting of two or more of the incidents of racketeering, which had the same or substantially similar purpose, or result, or participant, or victim, or method of commission, and which amount to or pose a threat of continued criminal activity in violation of MCL 750.159i; contrary to MCL 750.159i(4)
45. The facts alleged in paragraphs 1-43 are herein incorporated by reference. Affiant additionally alleges that the facts show that over the course of multiple years, Robert and Anne Minard engaged in a repeated scheme to defraud Make Michigan First, Protecting Michigan Future Fund, the Peninsula Fund, and Working Together for a Better for a Michigan, among other legal entities. The money they accepted was repeatedly deposited into their personal bank accounts and then used to pay off credit cards or other personal expenses. Both individuals engaged in submitting false documents and/or receiving fraudulently obtained money. Each of the false representations resulted in the Minard's receiving money they were not entitled to and then deposited into their joint bank accounts. This was a sophisticated scheme involving hundreds of thousands of dollars and Affiant believes the facts show that an agreement was in place between the Minards to conduct this scheme and enrich themselves.

Count 3: Taxes – Failure to File/False Return/Payment

46. Did, with the intent to defraud or evade the payment of a tax, or part of a tax, make a false or fraudulent income tax return or payment as required by MCL 206.311; contrary to MCL 205.27(1)(a).

47. Records were submitted to Sarah Johnson, a State of Michigan employee in the Treasury Division as an auditor and investigator. Mrs. Johnson compared state and federal tax returns filed in 2020 by the Minards with gross receipts into their bank and business accounts. Adjustments were made per deposits, reimbursements, transfers of funds, deductions, and capital gains, among other things. For the year 2020, the focus of this charge, Johnson opined that their reported AGI of \$ [REDACTED] was false. Based on adjustments made, Johnson opined their total AGI increased by approximately \$ [REDACTED] for the year 2020. This adjustment resulted in an additional tax owed of approximately \$ [REDACTED] notwithstanding additional penalties and interest. The adjustments were made based on review of certified bank records and certified tax filings submitted personally by Anne and Robert Minard.

Additional Counts

48. The facts alleged in Paragraphs 1-43 are herein incorporated by reference. Based on these facts, Affiant requests charging Robert Minard with the additional following counts:

Count 4: False pretenses - \$1,000.00 or more but less than \$20,000.00

49. On or about June 15, 2018 through January 27, 2019, in the City of East Lansing, defendants ROB MINARD and ANNE MINARD did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00, contrary to MCL 750.218(4)(a)

Count 5: False pretenses - \$1,000.00 or more but less than \$20,000.00

50. On or about September 7, 2018, in the City of East Lansing, defendant ROBERT MINARD did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00, contrary to MCL 750.218(4)(a)

Count 6: False pretenses - \$1,000.00 or more but less than \$20,000.00

51. On or about September 24, 2019, in the City of Lansing, defendants ROBERT MINARD and ANNE MINARD did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00, contrary to MCL 750.218(4)(a)

Count 7: False pretenses - \$1,000.00 or more but less than \$20,000.00

52. On or about July 6, 2020 in the City of East Lansing, defendants ROBERT MINARD and ANNE MINARD did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00, contrary to MCL 750.218(4)(a)

Count 8: False Pretenses - \$20,000.00 or more but less than \$50,000.00

53. On or about September 23, 2020 through October 14, 2020, in the City of East Lansing, defendants ROBERT MINARD and ANNE MINARD did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$20,000 or more but less than \$50,000; contrary to MCL 750.218(5)(a)

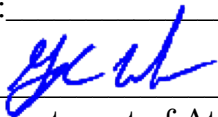
Count 9: Embezzlement over \$100,000.00

54. On or about October 22, 2020 through November 12, 2020, in the City of East Lansing, defendants ROBERT MINARD and ANNE MINARD being an agent of Working Together for a Better MI, did convert to his/her own use, money of Working Together for a Better Michigan, having a value of \$100,000 or more, that came into defendants' possession or under the defendants' control by virtue of his/her relationship with the principal; contrary to MCL 750.174(7);

WHEREFORE, the facts and circumstances developed during this investigation demonstrate probable cause to believe that each of the two Michigan residents named herein committed criminal offenses under Michigan Law.

Reviewed on: _____

/s/



(Affiant)

Michigan Department of Attorney General

Assistant Attorney General Gage Wakula

3030 W. Grand Blvd., Detroit MI 48206

Subscribed and Sworn before me on: _____

Date

Honorable _____

Judge/Magistrate – 54B District Court, East Lansing, State of Michigan