

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

1. Affiant, Special Agent Robert Menard, is a Special Agent with the Michigan Department of Attorney General's Criminal Investigations Division and has been employed as a law enforcement officer for thirty-three years. Affiant is currently assigned to the Major Case Section of the Criminal Division. 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 was assigned to investigate allegations made by Rebekah 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. Other special agents of the Michigan Department of Attorney General and detectives with the Michigan State Police were also assigned. Rebekah alleged, among other things, that Lee Chatfield misappropriated money that he raised for political and non-profit purposes and used the money for illegal purposes. During the investigation, it became clear that Robert and Anné Minard, senior staffers for Lee Chatfield, were intimately involved in misappropriation of these funds and others. Robert and Anné Minard each have criminal cases scheduled for preliminary examination in this Court.

3. In 2011, Robert and Anné 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 Anné 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

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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 Anné 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. Anné Minard served as Chatfield's Director of External Affairs during the time Chatfield was Speaker.

5. Lee Chatfield is married to Stephanie Chatfield. Lee Chatfield has several siblings including Paul Chatfield and Aaron Chatfield. Aaron is married to Rebekah Chatfield.
6. Aaron Chatfield worked for the Michigan House of Representatives. When Lee Chatfield became Speaker of the House, he began working for Grand River Strategies. Aaron Chatfield worked for Grand River Strategies through 2019. Even though he was not Lee Chatfield's employee, Aaron Chatfield had a working relationship with Lee Chatfield, where he often served as Lee Chatfield's driver and ran various errands for Lee Chatfield.
7. Paul Chatfield worked for the Michigan House of Representatives in caucus services from 2017–2018. From approximately January of 2020 through July of 2020 Paul worked for the Republican Party doing campaign work.
8. Robert Anderson worked for the House of Representatives in Caucus Services. In 2017 he was hired by Lee Chatfield and Robert Minard to work as his as Lee Chatfield's Constituent Relations Director. Robert Anderson worked in this capacity through 2020.
9. Wilbur Lovitt was a childhood friend of Aaron and Paul Chatfield. He was not one of Lee Chatfield's office employees at the Michigan House of Representatives.
10. Aaron, Paul, and Wilbur helped with Lee's first campaign in 2014. During Lee Chatfield's tenure at the Michigan House of Representatives, Robert Minard, Aaron Chatfield, Paul Chatfield, Robert Anderson, and Wilbur Lovitt frequently accompanied Lee Chatfield during Lee's personal and business-related travel.
11. Throughout this tenure, Robert and Anné 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 Anné Minard maintained and operated their own 501(C)(4) non-profit organization named Lift Up Michigan.

12. 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 committee¹:** 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)
- **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)

13. The Michigan 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.

14. The Michigan 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.

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

- 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.

15. 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.

16. **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 predominantly fund activities related to Lee Chatfield's political office. A Peninsula Fund Board of Directors' Consent Resolution dated June 30, 2017, lists Anné Minard as president, Becky Boyce as vice-president, Jill Larder as secretary/treasurer, and Renae Moore as assistant secretary/treasurer. The Peninsula Fund articles of incorporation state that the president shall be the principal executive officer of the corporation and be subject to the control of the board of directors, shall in general supervise and control all 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.
17. 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 Anné Minard. Renae Moore stated that she often relied upon Anné 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, Anné submitted fewer and fewer receipts which made the reconciliation process extremely difficult.
18. Moore further stated that although Anné Minard submitted a resignation from the Peninsula Fund 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, Anné had access to bank accounts, writing checks, and otherwise coordinating and directing Peninsula Fund expenses. Board members from the Peninsula Fund 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."
19. 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.

20. **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 Anné 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. Anné Minard directed these donations.
21. The following is a list of Independent PACs formed and associated with Lee Chatfield which all list Anné 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
22. On August 25, 2015, Anné Minard, on behalf of Chatfield Majority Fund, filed form 8871, “Political Organization Notice of Section 527 Status” and claimed tax-exempt status for the fund.
23. MCL 750.159i(1) prohibits conducting a criminal enterprise and 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. Racketeering activity includes committing, attempting to commit, conspiring to commit, or aiding and abetting, soliciting, coercing, or intimidating a person to commit an offense for financial gain by obtaining money, property, or any other thing of value. Eligible predicate offenses include, but are not limited to, embezzlement under MCL 750.174 (regardless of whether the principal is a non-profit organization), embezzlement by a public official under MCL 750.175, and larceny under MCL 750.356.
24. MCL 750.174 prohibits embezzlement and 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.

25. MCL 750.356 prohibits larceny and states in relevant part that a person who steals the money of another person is guilty of a crime punishable as provided in this section.
26. MCL 750.157a prohibits conspiring to commit a crime and states in relevant part that any person who conspires together with one or more persons to commit an offense prohibited by law is punishable as provided in this section.
27. MCL 750.175 prohibits embezzlement by a public officer and states in relevant part that any person holding any public office in this state, or the agent or servant of any such person, who knowingly and unlawfully appropriates to his own use, or to the use of any other person, the money or property received by him in his official capacity or employment, of the value of 50 dollars or upwards, shall be guilty of a felony, punishable as provided in this section.
28. MCL 400.293 prohibits various actions as to the money of charitable organizations. In relevant part, the section prohibits knowingly diverting or misdirecting contributions to a purpose or organization other than for which the funds were contributed or solicited. "Charitable organization" means a benevolent, educational, philanthropic, humane, patriotic, or eleemosynary organization of persons that solicits or obtains contributions solicited from the public for charitable purposes. The term includes a chapter, branch, area office, or similar affiliate or person soliciting contributions within the state for a charitable organization that has its principal place of business outside the state. MCL 400.272. Offenses are punishable as provided in MCL 400.293.
29. During the investigation, it became clear that Lee Chatfield, Stephanie Chatfield, Anné Minard, and Robert Minard there were converting and stealing non-profit, candidate committee, and/or PAC money. The information supporting these findings is as follows:

Count 1, Criminal Enterprises – Conducting

30. Being a person employed by or associated with an enterprise, to wit: The Michigan House of Representatives and/or the Peninsula Fund and/or Chatfield Majority Fund and/or Chatfield Majority Fund II 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

31. On or about February 2020 through April 2021, in the City of East Lansing, defendant LEE CHATFIELD did commit and/or aid or abet in the commission of the following offense for financial gain, to wit: being an agent, servant, or employee of the Peninsula Fund, a non-profit corporation or charitable organization, did convert to his own use, money or other personal property of his principal, having a value of \$1,000 or more but less than \$20,000, that came into the defendant's possession or under the defendant's charge or control by virtue of his relationship with the principal; contrary to MCL 750.174(5)(c).

32. The following facts support of Predicate 1:²

From February 2020 through April 2021, Lee Chatfield made \$132,000 in purchases on his personal Chase credit card. Peninsula Fund money was used to pay off the entire \$132,000 balance. Numerous charges during this time frame are clearly personal in nature. For example, in November 2020, Lee, Stephanie and their children went on vacation to Universal Studios in Orlando, Florida. While on vacation with his family, Lee's credit card was used to make purchases at the Spider-Man Shop (a Spider-Man themed souvenir shop located in Universal Studios theme park), Three Broomsticks (a Harry Potter themed restaurant in Universal Studios theme park); Honeydukes (a Harry Potter themed candy store in Universal Studios theme park). Additional transactions include grocery and restaurant purchases while on vacation, purchases at wineries, party stores, and restaurants; food delivery purchases through Uber Eats; and reoccurring bills through Apple.com. Transactions also include shopping purchases at Ugg, Coach, and a surf shop in Florida. Transactions of a personal nature during this time frame total at least \$1,700.00. All charges during this time frame were paid using funds from the Peninsula Fund, a social welfare organization.

Lee and Stephanie Chatfield worked together to facilitate using Peninsula Fund money to pay for Lee's personal credit card charges. While Lee appeared to be the person who generally used his personal Chase credit card, Stephanie's role was to monitor the balance and make payments from the Peninsula Fund's accounts. For example, in September of 2020 (less than 4 months before Chatfield would leave office) in a text message exchange between Lee and Stephanie where they discussed the balance on Lee's credit card, Stephanie stated, "I don't want to get caught come January with our tail between our legs and no money in the account to pay it off." This is during a time frame when every dollar charged to the Chase credit card is paid off with money from the Peninsula Fund's accounts. In context, Stephanie is not referring to using their own personal money or money from a permissible source to pay the balance on Lee's personal credit card. Text messages where Stephanie indicates to Lee that she made a payment of the Lee's personal credit card coincide with credit card payments made to Lee's personal credit card directly from Peninsula Fund accounts.

² Affiant alleges the facts under Predicate 1 also support Counts 2 and 3 in Lee Chatfield's complaint and Count 1 and 2 in Stephanie Chatfield's complaint.

Additionally, using Peninsula Fund money to pay a credit card balance associated with personal purchases diverted Peninsula Fund money to a purpose other than that for which the funds were contributed or solicited.³

Predicate 2

33. On or about November 2, 2020–December 10, 2020, in the City of East Lansing, defendant LEE CHATFIELD did commit and/or aid or abet in the commission the following offense for financial gain, to wit: being an agent, servant, or employee of the Chatfield Majority Fund, a non-profit corporation or charitable organization, did convert to his own use, money or other personal property of his principal, having a value of \$1,000 or more but less than \$20,000, that came into the defendant's possession or under the defendant's charge or control by virtue of his relationship with the principal; contrary to MCL 750.174(5)(c) OR IN THE ALTERNATIVE did commit the offense of larceny by stealing money that belonged to the Chatfield Majority Fund, the value of the property stolen was \$1,000 or more but less than \$20,000; contrary to MCL 750.356(3)(a).

34. The following facts support Predicate 2:⁴

Predicates 2–6 involve different checks with a common scheme. In general, Lee Chatfield has Anné Minard write a check to either Aaron Chatfield, Paul Chatfield, or Wilbur Lovitt from either the Chatfield Majority Fund or Chatfield Majority Fund 2. With each check, either Lee Chatfield or Anné tells the recipient that that a portion of the money is to be returned to Lee after the check is cashed. There are five checks associated with this scheme: two written from the Chatfield Majority Fund and three written from Chatfield Majority Fund 2. The Chatfield Majority Fund is a section 527 charitable organization, so embezzlement counts and predicates associated with those checks are embezzlements from a non-profit organization. Chatfield Majority Fund 2 is not a non-profit organization. Each check is slightly different.

Predicate 2 involves a \$5,000 check drawn on the Chatfield Majority Fund and written by Anné Minard to Aaron Chatfield. The check is dated November 2, 2020. It is not labeled as wages or a bonus. Additionally, the Chatfield Majority Fund does not have employees. Aaron Chatfield informed investigators that Lee Chatfield gave the check to him and said that Aaron could keep \$1,500 and Lee would take \$3,500 back. Rebekah informed investigators that Anné gave her the check with instructions to give money back to Lee. The check is deposited into Aaron and Rebekah's account a week later, on November 9, 2020. On November 13, 2020, Rebekah withdraws \$3,500 (\$1,500 as a cashier's check to Lee and \$2,000 as cash for Lee). Lee cashed or deposited the check on December 10, 2020. This all occurs leading up to Lee and Stephanie's family vacation to Orlando, Florida, and Universal Studios (Lee Chatfield Predicate 1 and Counts 1 and 2; Stephanie Chatfield Counts 1 and 2) and contemporaneous with an extravagant trip that

³ While a violation of MCL 400.293 is not a predicate for CCE, these facts support Count 13, Charitable Trust Act – Felony Violation.

⁴ Affiant alleges that the facts under Predicate 2 also support Count 4 in Lee Chatfield's complaint.

Lee Chatfield, Rob Minard, Aaron Chatfield, and Paul Chatfield took to Miami, Florida. In context, the evidence supports that Lee directed Anné to write this check.

Additionally, though it does not form the basis of one of our counts, Wilbur Lovitt received a check from the Chatfield Majority Fund 3 on November 2, 2020, the same day Aaron's November 2, 2020, check was written. Wilbur informed investigators that he received the check before the trip to Miami, Florida with Lee, Robert, Aaron, Paul, but he does not recall being told to do anything with the check. Wilbur was not working for the Chatfield Majority Fund 3 at the time.

Predicate 3

35. On or about December 12, 2018, in the City of East Lansing, defendant LEE CHATFIELD did commit and/or aid or abet in the commission of the following offense for financial gain, to wit: being an agent, servant, or employee of the Chatfield Majority Fund, a non-profit corporation or charitable organization, did convert to his own use, money or other personal property of his principal, having a value of \$1,000 or more but less than \$20,000, that came into the defendant's possession or under the defendant's charge or control by virtue of his relationship with the principal; contrary to MCL 750.174(5)(e) OR IN THE ALTERNATIVE did commit the offense of larceny by stealing money that belonged to the Chatfield Majority Fund, the value of the property stolen was \$1,000 or more but less than \$20,000; contrary to MCL 750.356(3)(a).

36. The following facts support Predicate 3:⁵

Predicate 3 involves a \$5,000 check drawn on the Chatfield Majority Fund and written by Anné Minard to Wilbur Lovitt. The check is dated December 12, 2018, and is labeled "wages" in the memo line. Wilbur informed investigators that he received the check from Aaron or Paul while they were in the Bahamas together. Lee Chatfield, Robert Minard, Aaron Chatfield, Paul Chatfield, Robert Anderson, and Wilbur Lovitt went to the Bahamas together from December 14, 2018–December 17, 2018. The trip cost approximately \$32,000 and was paid for by Robert Minard. While in the Bahamas, Wilbur used \$2,000 of the money from the check himself and gave the remaining \$3,000 back to Lee. Some of the \$3,000 was given back to Lee directly and some was given back to Lee through Lee requesting that Wilbur cover various out-of-pocket expenses in the Bahamas. Wilbur stated that at the time, he was told that it was a "bonus check" for wages for work he had done in the past, but Wilbur knew it wasn't just that, and that he would be giving some of the money back to Lee. Wilbur believes some of this was explained to him by Aaron. Aaron told investigators that he gave Wilbur a check with instructions that money should go back to Lee. Aaron told investigators that Lee or Anné handed him the check to give to Wilbur with instructions to give money back to Lee. In context, it appears that Lee directed Anné to write this check.

⁵ Affiant alleges the facts under Predicate 3 also support Count 5 in Lee Chatfield's complaint.

Predicate 4

37. On or about November 27, 2018–December 11, 2018, in the City of East Lansing, defendant LEE CHATFIELD did commit and/or aid or abet in the commission of the following offense for financial gain, to wit: being an agent, servant, or employee of the Chatfield Majority Fund 2, did convert to his own use, money or other personal property of his principal, having a value of \$1,000 or more but less than \$20,000, that came into the defendant’s possession or under the defendant’s charge or control by virtue of his relationship with the principal; contrary to MCL 750.174(5)(c) OR IN THE ALTERNATIVE did commit the offense of larceny by stealing money that belonged to the Chatfield Majority Fund 2, the value of the property stolen was \$1,000 or more but less than \$20,000; contrary to MCL 750.356(3)(a).

38. The following facts support Predicate 4:⁶

Predicate 4 involves a \$1,645 check drawn from the Chatfield Majority Fund 2 and written by Anné Minard to Aaron Chatfield. The check is dated November 27, 2018. The check is part of a scheme to use PAC money to pay for personal retail and bar expenses incurred by Lee and others while on a trip to Las Vegas, Nevada in May 2018. Lee Chatfield and others improperly used Peninsula Fund money to pay for \$1,645.00 in retail and bar expenses in May of 2018. Anné Minard writes a check to Aaron for \$1,675, the amount of the improper expenses. Days later, Aaron deposits the check and withdraws \$1,645. \$1,645 is deposited into Lee and Stephanie’s account. On December 11, 2018, Anné emails Renee Moore a series of deposits, including a check from Lee and Stephanie to the Peninsula Fund for \$1,645. Anné includes a note that says, “the one from Lee and Stephanie is the reimbursement for the Vegas expense.” Aaron told investigators that it was either Anné or Lee who told him what to do with the check, but that if it was Anné, it would be because Lee told her what to say.

Predicate 5

39. On or about November 30, 2018–December 7, 2018, in the City of East Lansing, defendant LEE CHATFIELD did commit and/or aid or abet in the commission of the following offense for financial gain, to wit: being an agent, servant, or employee of the Chatfield Majority Fund 2, did convert to his own use, money or other personal property of his principal, having a value of \$1,000 or more but less than \$20,000, that came into the defendant’s possession or under the defendant’s charge or control by virtue of his relationship with the principal; contrary to MCL 750.174(5)(c) OR IN THE ALTERNATIVE did commit the offense of larceny by stealing money that belonged to the Chatfield Majority Fund 2, the value of the property stolen was \$1,000 or more but less than \$20,000; contrary to MCL 750.356(3)(a).

⁶ Affiant alleges the facts under Predicate 4 also support Count 6 of Lee Chatfield’s complaint.

40. The following facts support Predicate 5:⁷

Predicate 5 involves a \$1,000 check drawn from the Chatfield Majority Fund 2 and written to Aaron Chatfield by Anné Minard. The check is dated November 30, 2018 (three days after the check in Predicate 4/Count 6 and shortly before the December 2018 Bahamas trip). As to this check, Aaron Chatfield told investigators that Lee said, "I'm going to give you a check. You're going to give me a certain amount back. And then maybe the rest if needed." Aaron said the same thing happened with Wilbur (appearing to refer to Predicate 3/Count 4). In context, this check was not Aaron's wages, and its entire amount is the amount embezzled or stolen.

Predicate 6

41. On or about November 2, 2020, in the City of East Lansing, defendant LEE CHATFIELD did commit and/or aid or abet in the commission of the following offense for financial gain, to wit: being an agent, servant, or employee of the Chatfield Majority Fund 2, did convert to his own use, money or other personal property of his principal, having a value of \$1,000 or more but less than \$20,000, that came into the defendant's possession or under the defendant's charge or control by virtue of his relationship with the principal; contrary to MCL 750.174(5)(c) OR IN THE ALTERNATIVE did commit the offense of larceny by stealing money that belonged to the Chatfield Majority Fund 2, the value of the property stolen was \$1,000 or more but less than \$20,000; contrary to MCL 750.356(3)(a).

42. The following facts support Predicate 6:⁸

Predicate 6 involves a \$5,000 check drawn from the Chatfield Majority Fund 2, written by Anné Minard to Paul Chatfield. The check is dated November 2, 2020, the same day as Aaron's \$5,000 check in Predicate 2/Count 4. Again, this all occurs leading up to Lee and Stephanie's family vacation to Universal Studios in Orlando, Florida and contemporaneously with Lee Chatfield, Paul Chatfield, Aaron Chatfield, Bob Anderson, and Wilbur Lovitt's November 2020 trip to Miami, Florida. Paul told investigators that he remembers receiving a \$5,000 check and Lee requested "maybe \$1,000" back. Paul could not remember if this occurred before the 2018 Bahamas trip, or in 2020 before the Miami trip. Paul told investigators that if they (Lee and Anné) asked for money back, Paul assumed that it would be used to cover the cost of the trips. In context, this check appears designed to provide both Paul and Lee with spending money for their trips and does not appear to be associated with wages.

⁷ Affiant alleges the facts under Predicate 5 also support Count 7 in Lee Chatfield's complaint.

⁸ The facts alleged under Predicate 6 also support Count 8 in Lee Chatfield's complaint.

Predicate 7

43. On or about January 29, 2019–March 1, 2019, in the City of Lansing, defendant LEE CHATFIELD did commit and/or aid or abet in the commission of the following offense for financial gain, to wit: did, being a person holding public office in this state, knowingly and unlawfully appropriate to his/her own use or to the use of any other person, money or property received by him in his official capacity or employment, to wit; money in the form of mileage reimbursement, of the value of \$50.00 or more; contrary to MCL 750.175.

44. The following facts support Predicate 7:⁹

As a member of the Michigan House of Representatives, Chatfield was entitled to receive a travel reimbursement each week for one round trip between Lansing, Michigan and his home district, Michigan's 107th district. One round trip from Lansing, Michigan to Chatfield's home district is 448 miles. He was also entitled to receive travel reimbursements for any miles driven within his district for official legislative business. Each month, Chatfield submitted paperwork showing which days he claimed to have traveled to/from district and how many in-district miles were traveled, if any. The round trip and in-district gas and travel reimbursements pay \$0.58 per mile in 2019 and \$0.575 in 2020.

During his time as the Michigan Speaker of the House, Lee Chatfield sought travel reimbursements from the State of Michigan through the State Officers Compensation Commission. From January 2019 through December 2020, Lee Chatfield received over \$30,000 in reimbursement for gas and travel expenses. Per Michigan House of Representative Guidelines and Policies, "Reimbursement at the State Standardized mileage rate for one round trip per week between the legislature's home district and the state capitol shall continue as a separate expense reimbursement. The trip must be made to qualify for reimbursement." However, Chatfield's calendar indicates that many of the times he sought travel reimbursements, a trip from Lansing to his home district was not made. Of the 42,337 miles Chatfield sought reimbursement for, approximately 21,280 miles appear to be associated with trips not actually taken. This amounts to approximately \$12,299.84 that was improperly reimbursed.

One improper reimbursement is associated with a trip Lee Chatfield claimed he took on January 29, 2019. Calendar entries and financial transactions reflect that Lee Chatfield was in Ann Arbor, Michigan on January 29, 2019, and that he flew from the Detroit (DTW) airport to Phoenix, Arizona on January 30, 2019. On March 1, 2019, Lee Chatfield signed a reimbursement form that claimed he made a trip from Lansing to Levering and back on January 29, 2019. It does not appear that this trip occurred. By falsely claiming that it did and seeking reimbursement, Lee Chatfield embezzled public funds in the amount of \$259.84.

⁹ The facts alleged under Predicate 7 also support Count 9 in Lee Chatfield's complaint.

Predicate 8

45. On or about February 26, 2019–March 1, 2019, in the City of Lansing, defendant LEE CHATFIELD did commit and/or aid or abet in the commission of the following offense for financial gain, to wit: did, being a person holding public office in this state, knowingly and unlawfully appropriate to his/her own use or to the use of any other person, money or property received by him in his official capacity or employment, to wit; money in the form of mileage reimbursement, of the value of \$50.00 or more; contrary to MCL 750.175.

46. The following facts support Predicate 8:¹⁰

Paragraph 47 is incorporated by reference. Another improper reimbursement is associated with a trip Lee Chatfield claimed he took on February 26, 2019. Calendar entries, financial transactions, and other records reflect that Lee Chatfield was in Puerto Rico from February 23, 2019, to February 25, 2019, and flew from Puerto Rico to the Detroit (DTW) airport on February 26, 2019. Additionally, records reflect that Lee Chatfield had meetings in Lansing on February 26, 2019, and stayed overnight in Detroit on February 26, 2019. On March 1, 2019, Lee Chatfield signed a reimbursement form that claimed he made a trip from Lansing to Levering and back on February 26, 2019. This trip did not occur. By falsely claiming that it did, and seeking reimbursement, Lee Chatfield embezzled public funds in the amount of \$259.84.

Predicate 9

47. On or about September 2, 2019–October 2, 2019, in the City of Lansing, defendant LEE CHATFIELD did commit and/or aid or abet in the commission of the following offense for financial gain, to wit: did, being a person holding public office in this state, knowingly and unlawfully appropriate to his/her own use or to the use of any other person, money or property received by him in his official capacity or employment, to wit; money in the form of mileage reimbursement, of the value of \$50.00 or more; contrary to MCL 750.175.

48. The following facts support Predicate 9:¹¹

Paragraph 47 is incorporated by reference. Another improper reimbursement is associated with a trip Lee Chatfield claimed that he took on September 2, 2019. Calendar entries, financial transactions, and other records reflect that Lee Chatfield on September 2, 2019, did not drive to his home district, but instead flew there, landing at the Pellston, Michigan airport in the afternoon on September 2, 2019. Lee Chatfield signed a reimbursement form that claimed he made a trip from Lansing to Levering and back on October 2, 2019. This trip did not occur. By falsely claiming that it did, and seeking reimbursement, Lee Chatfield embezzled public funds in the amount of \$259.84. While only three instances of improper reimbursement were selected to form the basis of

¹⁰ The facts alleged under Predicate 8 also support Count 10 in Lee Chatfield's complaint.

¹¹ The facts alleged under Predicate 9 also support Count 11 in Lee Chatfield's complaint.

predicate offenses and criminal charges, there are numerous trips that fit this general pattern, and it appears that Lee Chatfield embezzled approximately \$12,299.84 through this scheme.

Predicate 10

49. On or about December 2017 through December 2019, in the City of Lansing, defendant LEE CHATFIELD did commit and/or aid or abet in the commission of the following offense for financial gain, to wit: being an agent, servant, or employee of the Peninsula Fund, a non-profit corporation or charitable organization, did convert to his own use, money or other personal property of his principal, having a value of \$1,000 or more but less than \$20,000, that came into the defendant's possession or under the defendant's charge or control by virtue of his relationship with the principal; contrary to MCL 750.174(5)(c).

50. The following facts support Predicate 10:¹²

From December 2017-December 2019 Lee Chatfield rented an apartment from Walnut Tree Properties, a company that was owned by the Michigan Automobile Dealers Association, a lobbying firm that is run by Terry Burns. Lee Chatfield's lease was from February 2015-January 2016 and appears to have converted to a month-to-month arrangement thereafter. From December 2017-December 2019, Lee Chatfield's monthly rent was \$775.00 and was paid for by the Peninsula Fund. Lee Chatfield subleased one of the bedrooms in the apartment to Gerald Sullivan for \$250.00 per month. Sullivan paid Lee Chatfield directly via check, and Lee Chatfield did not reimburse Peninsula Fund for the profit he made by subleasing a portion of the apartment. While it remains questionable whether financing Lee Chatfield's Lansing apartment is genuinely related to Peninsula Fund's social welfare purpose, providing Lee Chatfield with a subleasing income stream is not related to the fund's purpose. Lee Chatfield embezzled \$6,225.00 from the Peninsula Fund by failing to reimburse the fund for the money that they spent on the apartment.

Additional Counts

51. The facts alleged in Paragraphs 1-50 are herein incorporated by reference. Based on these facts, Affiant requests charging Lee Chatfield with the additional following counts:

Count 2, Embezzlement from a non-profit organization \$1,000-\$20,000

On or about February 2020 through April 2021, in the City of East Lansing, defendant LEE CHATFIELD did commit the following offense, to wit: being an agent, servant, or employee of the Peninsula Fund, a non-profit corporation or charitable organization, did convert to his own use, money or other personal property of his principal, having a value of

¹² The facts alleged under Predicate 10 also support Count 12 in Lee Chatfield's complaint.

\$1,000 or more but less than \$20,000, that came into the defendant's possession or under the defendant's charge or control by virtue of his relationship with the principal; contrary to MCL 750.174(5)(c).

Count 3, Conspiracy to commit embezzlement from a non-profit organization \$1,000-\$20,000

On or about February 2020 through April 2021, in the City of East Lansing, defendant LEE CHATFIELD did unlawfully conspire, combine, confederate, and agree together with STEPHANIE CHATFIELD and/or other known or unknown persons to commit the following listed offense; contrary to MCL 750.157a: Embezzlement from a non-profit organization \$1,000-\$20,000, MCL 750.174(5)(c).

Count 4, Embezzlement from a non-profit \$1,000-\$20,000 or in the alternative larceny \$1,000-\$20,000

On or about November 2, 2020–December 10, 2020, in the City of East Lansing, defendant LEE CHATFIELD did commit the following offense, to wit: being an agent, servant, or employee of the Chatfield Majority Fund, a non-profit corporation or charitable organization, did convert to his own use, money or other personal property of his principal, having a value of \$1,000 or more but less than \$20,000, that came into the defendant's possession or under the defendant's charge or control by virtue of his relationship with the principal; contrary to MCL 750.174(5)(c)

OR IN THE ALTERNATIVE

did commit the offense of larceny by stealing money that belonged to the Chatfield Majority Fund, the value of the property stolen was \$1,000 or more but less than \$20,000; contrary to MCL 750.356(3)(a).

Count 5, Embezzlement from a non-profit \$1,000-\$20,000 or in the alternative larceny \$1,000-\$20,000

On or about December 12, 2018, in the City of East Lansing, defendant LEE CHATFIELD did commit the following offense, to wit: being an agent, servant, or employee of the Chatfield Majority Fund, a non-profit corporation or charitable organization, did convert to his own use, money or other personal property of his principal, having a value of \$1,000 or more but less than \$20,000, that came into the defendant's possession or under the defendant's charge or control by virtue of his relationship with the principal; contrary to MCL 750.174(5)(c)

OR IN THE ALTERNATIVE

did commit the offense of larceny by stealing money that belonged to the Chatfield Majority Fund, the value of the property stolen was \$1,000 or more but less than \$20,000; contrary to MCL 750.356(3)(a).

**Count 6, Embezzlement from a non-profit \$1,000–\$20,000
or in the alternative larceny \$1,000–\$20,000**

On or about November 27, 2018–December 11, 2018, in the City of East Lansing, defendant LEE CHATFIELD did commit the following offense, to wit: being an agent, servant, or employee of the Chatfield Majority Fund 2, did convert to his own use, money or other personal property of his principal, having a value of \$1,000 or more but less than \$20,000, that came into the defendant’s possession or under the defendant’s charge or control by virtue of his relationship with the principal; contrary to MCL 750.174(5)(c)

OR IN THE ALTERNATIVE

did commit the offense of larceny by stealing money that belonged to the Chatfield Majority Fund 2, the value of the property stolen was \$1,000 or more but less than \$20,000; contrary to MCL 750.356(3)(a).

**Count 7, Embezzlement from a non-profit \$1,000–\$20,000
or in the alternative larceny \$1,000–\$20,000**

On or about November 30, 2018–December 7, 2018, in the City of East Lansing, defendant LEE CHATFIELD did commit the following offense, to wit: being an agent, servant, or employee of the Chatfield Majority Fund 2, did convert to his own use, money or other personal property of his principal, having a value of \$1,000 or more but less than \$20,000, that came into the defendant’s possession or under the defendant’s charge or control by virtue of his relationship with the principal; contrary to MCL 750.174(5)(c)

OR IN THE ALTERNATIVE

did commit the offense of larceny by stealing money that belonged to the Chatfield Majority Fund 2, the value of the property stolen was \$1,000 or more but less than \$20,000; contrary to MCL 750.356(3)(a).

**Count 8, Embezzlement from a non-profit \$1,000–\$20,000
or in the alternative larceny \$1,000–\$20,000**

On or about November 2, 2020, in the City of East Lansing, defendant LEE CHATFIELD did commit the following offense, to wit: being an agent, servant, or employee of the Chatfield Majority Fund 2, did convert to his own use, money or other personal property of his principal, having a value of \$1,000 or more but less than \$20,000, that came into the defendant’s possession or under the defendant’s charge or control by virtue of his relationship with the principal; contrary to MCL 750.174(5)(c)

OR IN THE ALTERNATIVE

did commit the offense of larceny by stealing money that belonged to the Chatfield Majority Fund 2, the value of the property stolen was \$1,000 or more but less than \$20,000; contrary to MCL 750.356(3)(a).

Count 9, Embezzlement by Public Officer over \$50

On or about January 29, 2019–March 1, 2019, in the City of Lansing, defendant LEE CHATFIELD did commit the following offense, to-wit: did, being a person holding public office in this state, knowingly and unlawfully appropriate to his/her own use or to the use of any other person, money or property received by him in his official capacity or employment, to wit; money in the form of mileage reimbursement, of the value of \$50.00 or more; contrary to MCL 750.175.

Count 10, Embezzlement by Public Officer over \$50

On or about February 26, 2019–March 1, 2019, in the City of Lansing, defendant LEE CHATFIELD did commit the following offense, to-wit: did, being a person holding public office in this state, knowingly and unlawfully appropriate to his/her own use or to the use of any other person, money or property received by him in his official capacity or employment, to wit; money in the form of mileage reimbursement, of the value of \$50.00 or more; contrary to MCL 750.175.

Count 11, Embezzlement by Public Officer over \$50

On or about September 2, 2019–October 2, 2019, in the City of Lansing, defendant LEE CHATFIELD did commit the following offense, to-wit: did, being a person holding public office in this state, knowingly and unlawfully appropriate to his/her own use or to the use of any other person, money or property received by him in his official capacity or employment, to wit; money in the form of mileage reimbursement, of the value of \$50.00 or more; contrary to MCL 750.175.

Count 12, Embezzlement from a non-profit organization \$1,000–\$20,000

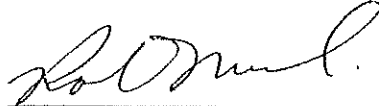
On or about December 2017 through December 2019, in the City of Lansing, defendant LEE CHATFIELD did commit the following offense, to wit: being an agent, servant, or employee of the Peninsula Fund, a non-profit corporation or charitable organization, did convert to his own use, money or other personal property of his principal, having a value of \$1,000 or more but less than \$20,000, that came into the defendant's possession or under the defendant's charge or control by virtue of his relationship with the principal; contrary to MCL 750.174(5)(c).

Count 13, Charitable Trust Act-Felony Violation

On or about February 2020 through April 2021, in the City of East Lansing, defendant LEE CHATFIELD did commit the following offense, to wit: did knowingly divert or misdirect contributions to a purpose or organization other than for which the funds were

contributed or solicited, and the aggregate amount of money solicited exceeded \$1,000.00; contrary to MCL 400.293.

WHEREFORE, the facts and circumstances developed during this investigation demonstrate probable cause to believe that Lee Chatfield committed criminal offenses under Michigan Law.

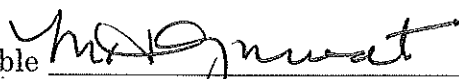


04/15/2024

Affiant

Date

Subscribed and Sworn before me on: 4/16/24
Date

Honorable  P73583

Judge, 54B District Court,
East Lansing, Michigan