

2024900402
MA

Original - Court
1st copy - Defendant

2nd copy - Prosecutor
3rd copy - Defendant Attorney

STATE OF MICHIGAN
54B JUDICIAL DISTRICT
30L JUDICIAL CIRCUIT

SUMMONS
FELONY

DISTRICT:
CIRCUIT:
CTN: 96-24900402-01
AG #: 2022-0338639-B

District Court ORI: MI330065J

Circuit Court ORI: MI330055J

AG ORI: MI820025A

THE PEOPLE OF THE STATE OF MICHIGAN		Defendant's name and address v LEE CHATFIELD [REDACTED]		Victim or complainant STATE OF MICHIGAN	
Co-defendant(s) Stephanie Chatfield				Complaining Witness S/A ROBERT MENARD	
Date: On or about 12/01/2017-04/30/2021					
City/Twp./Village Ingham County	County in Michigan INGHAM	Defendant TCN	Defendant CTN 96-24900402-01	Defendant SID	
Defendant DOB Put DOB In Ref. No. row 1 on MC 97	Defendant DLN Put DLN In Ref. No. row 3 on MC 97	DLN Type:	Vehicle Type	Defendant Sex M	Defendant Race
Police agency report no. 2022-0338639-B	Charge See below			Maximum penalty See below	

A sample for chemical testing for DNA identification profiling is on file with the Michigan State Police from a previous case.

Witnesses

State of Michigan

S/A Robert Menard

STATE OF MICHIGAN, COUNTY OF Ingham

The complaining has filed a sworn complaint in this court stating that on the date and at the location described, the defendant, contrary to law,

COUNT 1: CRIMINAL ENTERPRISES - CONDUCTING

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, to wit:

Predicate 1, 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);

Predicate 2, on or about November 2, 2020 through 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);

Predicate 3, 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)(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);

Predicate 4, on or about November 27, 2018 through 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);

Predicate 5, on or about November 30, 2018 through 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);

Predicate 6, 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);

Predicate 7, on or about January 29, 2019 through 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;

Predicate 8, on or about February 26, 2019 through 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;

Predicate 9, on or about September 2, 2019 through 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;

Predicate 10, 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);

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).

FELONY: 20 years and/or \$100,000.00; criminal forfeiture of proceeds, substituted proceeds, and instrumentalities of racketeering; pursuant to MCL 750.159j(5), the following property was used in the course of, intended for use in the course of, derived from or realized through the racketeering conduct alleged herein, and upon conviction under MCL 750.159i, is subject to forfeiture: None. [750.159i1]

COUNT 2: EMBEZZLEMENT FROM A NON-PROFIT ORGANIZATION \$1,000 OR MORE BUT LESS THAN \$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 \$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).

FELONY: 10 Years and/or \$15,000.00, or 3 times the amount embezzled, whichever is greater. A consecutive sentence may be imposed for any other conviction if the embezzlement victim was a non-profit, a person 60 years of age or older, or a vulnerable adult. To impose a fine of 3 times the value, the defendant must admit the amount, or it must be determined by the trier of fact at trial. See *Southern Union Co. v United States*, 567 US 343 (2012). [750.1745C]

COUNT 3: CONSPIRACY TO COMMIT EMBEZZLEMENT FROM A NON-PROFIT ORGANIZATION \$1,000 OR MORE BUT LESS THAN \$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).

FELONY: 10 Years and/or \$15,000.00 and \$10,000 additional fine. [750.1745C[C]]

COUNT 4: EMBEZZLEMENT FROM A NON-PROFIT ORGANIZATION \$1,000 OR MORE BUT LESS THAN \$20,000

On or about November 2, 2020 through 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).

FELONY: 10 Years and/or \$15,000.00, or 3 times the amount embezzled, whichever is greater. A consecutive sentence may be imposed for any other conviction if the embezzlement victim was a non-profit, a person 60 years of age or older, or a vulnerable adult. To impose a fine of 3 times the value, the defendant must admit the amount, or it must be determined by the trier of fact at trial. See *Southern Union Co. v United States*, 567 US 343 (2012). [750.1745C]

OR IN THE ALTERNATIVE

COUNT 4: LARCENY \$1,000 OR MORE BUT LESS THAN \$20,000

On or about November 2, 2020 through December 10, 2020, in the City of East Lansing, defendant LEE CHATFIELD 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).

FELONY: 5 Years and/or \$10,000.00, or 3 times value of property stolen, whichever is greater. To impose a fine of 3 times the value, the defendant must admit the amount, or it must be determined by the trier of fact at trial. See *Southern Union Co. v United States*, 567 US 343 (2012). [750.3563A]

COUNT 5: EMBEZZLEMENT FROM A NON-PROFIT ORGANIZATION \$1,000 OR MORE BUT LESS THAN \$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).

FELONY: 10 Years and/or \$15,000.00, or 3 times the amount embezzled, whichever is greater. A consecutive sentence may be imposed for any other conviction if the embezzlement victim was a non-profit, a person 60 years of age or older, or a vulnerable adult. To impose a fine of 3 times the value, the defendant must admit the amount, or it must be determined by the trier of fact at trial. See *Southern Union Co. v United States*, 567 US 343 (2012). [750.1745C]

OR IN THE ALTERNATIVE

COUNT 5: LARCENY \$1,000 OR MORE BUT LESS THAN \$20,000

On or about December 12, 2018, in the City of East Lansing, defendant LEE CHATFIELD 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).

FELONY: 5 Years and/or \$10,000.00, or 3 times value of property stolen, whichever is greater. To impose a fine of 3 times the value, the defendant must admit the amount, or it must be determined by the trier of fact at trial. See *Southern Union Co. v United States*, 567 US 343 (2012). [750.3563A]

COUNT 6: EMBEZZLEMENT \$1,000 OR MORE BUT LESS THAN \$20,000

On or about November 27, 2018 through 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).

FELONY: 5 Years and/or \$10,000.00, or 3 times the amount embezzled, whichever is greater. A consecutive sentence may be imposed for any other conviction if the embezzlement victim was a non-profit, a person 60 years of age or older, or a vulnerable adult. To impose a fine of 3 times the value, the defendant must admit the amount, or it must be determined by the trier of fact at trial. See *Southern Union Co. v United States*, 567 US 343 (2012). [750.1744A]

OR IN THE ALTERNATIVE

COUNT 6: LARCENY \$1,000 OR MORE BUT LESS THAN \$20,000

On or about November 27, 2018 through December 11, 2018, in the City of East Lansing, defendant LEE CHATFIELD 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).

FELONY: 5 Years and/or \$10,000.00, or 3 times value of property stolen, whichever is greater. To impose a fine of 3 times the value, the defendant must admit the amount, or it must be determined by the trier of fact at trial. See *Southern Union Co. v United States*, 567 US 343 (2012). [750.3563A]

COUNT 7: EMBEZZLEMENT \$1,000 OR MORE BUT LESS THAN \$20,000

On or about November 30, 2018 through 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).

FELONY: 5 Years and/or \$10,000.00, or 3 times the amount embezzled, whichever is greater. A consecutive sentence may be imposed for any other conviction if the embezzlement victim was a non-profit, a person 60 years of age or older, or a vulnerable adult. To impose a fine of 3 times the value, the defendant must admit the amount, or it must be determined by the trier of fact at trial. See *Southern Union Co. v United States*, 567 US 343 (2012). [750.1744A]

OR IN THE ALTERNATIVE

COUNT 7: LARCENY \$1,000 OR MORE BUT LESS THAN \$20,000

On or about November 30, 2018 through December 7, 2018, in the City of East Lansing, defendant LEE CHATFIELD 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).

FELONY: 5 Years and/or \$10,000.00, or 3 times value of property stolen, whichever is greater. To impose a fine of 3 times the value, the defendant must admit the amount, or it must be determined by the trier of fact at trial. See *Southern Union Co. v United States*, 567 US 343 (2012). [750.3563A]

COUNT 8: EMBEZZLEMENT \$1,000 OR MORE BUT LESS THAN \$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).

FELONY: 5 Years and/or \$10,000.00, or 3 times the amount embezzled, whichever is greater. A consecutive sentence may be imposed for any other conviction if the embezzlement victim was a non-profit, a person 60 years of age or older, or a vulnerable adult. To impose a fine of 3 times the value, the defendant must admit the amount, or it must be determined by the trier of fact at trial. See *Southern Union Co. v United States*, 567 US 343 (2012). [750.1744A]

OR IN THE ALTERNATIVE

COUNT 8: LARCENY \$1,000 OR MORE BUT LESS THAN \$20,000

On or about November 2, 2020, in the City of East Lansing, defendant LEE CHATFIELD 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).

FELONY: 5 Years and/or \$10,000.00, or 3 times value of property stolen, whichever is greater. To impose a fine of 3 times the value, the defendant must admit the amount, or it must be determined by the trier of fact at trial. See *Southern Union Co. v United States*, 567 US 343 (2012). [750.3563A]

COUNT 9: EMBEZZLEMENT BY PUBLIC OFFICER OVER \$50

On or about January 29, 2019 through 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.

FELONY: 10 Years and/or \$5,000.00. [750.175]

COUNT 10: EMBEZZLEMENT BY PUBLIC OFFICER OVER \$50

On or about February 26, 2019 through 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.

FELONY: 10 Years and/or \$5,000.00. [750.175]

COUNT 11: EMBEZZLEMENT BY PUBLIC OFFICER OVER \$50

On or about September 2, 2019 through 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.

FELONY: 10 Years and/or \$5,000.00. [750.175]

COUNT 12: EMBEZZLEMENT FROM A NON-PROFIT ORGANIZATION \$1,000 OR MORE BUT LESS THAN \$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).

FELONY: 10 Years and/or \$15,000.00, or 3 times the amount embezzled, whichever is greater. A consecutive sentence may be imposed for any other conviction if the embezzlement victim was a non-profit, a person 60 years of age or older, or a vulnerable adult. To impose a fine of 3 times the value, the defendant must admit the amount, or it must be determined by the trier of fact at trial. See *Southern Union Co. v United States*, 567 US 343 (2012). [750.145C]

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.

FELONY: 5 Years and/or \$20,000. [400.145C]

Court shall order law enforcement to collect a DNA identification profiling sample before sentencing or disposition, if not taken at arrest.

IN THE NAME OF THE PEOPLE OF THE STATE OF MICHIGAN

TAKE NOTICE: YOU ARE SUMMONED TO APPEAR for arraignment on May 2, 2024 @ 9:00am

at , at the address above Zoom arraignment, Michigan,

before the presiding judge. If you fail to appear, a warrant will be issued for your arrest upon the prosecutor's request. This summons expires on the date of hearing. If you require special accommodations to use the court because of disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

MA Greenwell 4/16/24
Judge/Magistrate signature and date. P73583