

State of Michigan 54B District Court East Lansing	<b>AFFIDAVIT          IN SUPPORT OF COMPLAINT</b>  <b>People v. Stephanie Chatfield</b>	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. Additionally, it became clear that Stephanie Chatfield was also involved in misappropriating funds of a 501(C)(4) non-profit organization.
  
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.

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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 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. 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.
7. 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.
8. **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.
  9. 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.
  10. 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.
  11. 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.”

12. 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.
13. 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.
14. 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.
15. 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.
16. 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).
17. 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.

18. 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.
19. 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.
20. 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.
21. Based on paragraphs 1–20, Affiant requests charging Stephanie Chatfield with the additional following counts:<sup>1</sup>

**Count 1, 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 STEPHANIE CHATFIELD did commit the following offense, to wit: being an agent, servant, or employee of the Peninsula Fund, or acting as an aider and abettor with another person who is 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 their relationship with the principal; contrary to MCL 750.174(5)(c).

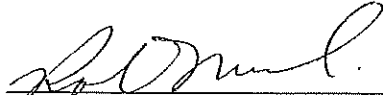
**Count 2, Conspiracy to commit embezzlement from a non-profit organization \$1,000–\$20,000**

On or about February 2020 through April 2021, in the City of East Lansing, defendant STEPHANIE CHATFIELD did unlawfully conspire, combine, confederate, and agree together with LEE 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).

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<sup>1</sup> The facts that support Counts 1 and 2 against Stephanie Chatfield also support Counts 2 and 3 and Predicate 1 in Lee Chatfield's complaint.

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



Affiant

04/15/2024

Date

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

Honorable MAGistrate P73583  
Judge, 54B District Court,  
East Lansing, Michigan