

**Michigan Department of State
Campaign Finance Complaint Form**

This complaint form may be used to file a complaint alleging that someone violated the Michigan Campaign Finance Act (the MCFA, 1976 PA 388, as amended; MCL 169.201 *et seq.*).

Please print or type all information.

I allege that the MCFA was violated as follows:

Section 1. Complainant		
Your Name Brett Chittum		Daytime Telephone Number 206-459-6360
Mailing Address 13853 Heritage St		
City Riverview	State MI	Zip 48193

Section 2. Alleged Violator		
Your Name CTE Chuck Norton and Chuck Norton		
Mailing Address 14617 Shenandoah		
City Riverview	State MI	Zip 48193

Section 3. Alleged Violations (Use additional sheet if more space is needed.)

Section(s) of the MCFA violated:

MCFA Section 169.233 Act 388 of 1976

Explain how those sections were violated:

I believe that this candidate, who has a current Reporting Waiver (as of 09/24/2023), has spent over the amount to have this waiver and is in violation of not reporting and having full disclosure and transparency into his finances. He has hundreds of yard signs out in the neighborhood, multiple meet and greets where he provided food, supplied multiple "Vote for Chuck Norton" t-shirts that he handed out, had flyer handout events where he has handed out hundreds of flyers, a booth at local events where there is a banner with his information, and sponsorship of a golf outing. Most if not all, of which happened prior to the primary election.

Evidence that supports those allegations (attach copies of pertinent documents and other information):

Please see attached in email

Section 4. Certification (Required)

I certify that to the best of my knowledge, information, and belief, formed after a reasonable inquiry under the circumstances, each factual contention of this complaint is supported by evidence.

X


Signature of Complainant

09/24/2023

Date

Section 5. Certification without Evidence (Supplemental to Section 4)

Section 15(6) of the MCFA (MCL 169.215) required that the signed certification found in section 4 of this form be included in every complaint. However, if, after a reasonable inquiry under the circumstances, you are unable to certify that certain factual contentions are supported by evidence, you may also make the following certification:

I certify that to the best of my knowledge, information, or belief, there are grounds to conclude that the following specifically identified factual contentions are likely to be supported by evidence after a reasonable opportunity for further inquiry. Those specific contentions are:

X

Signature of Complainant

Date

Section 15(8) of the MCFA provides that a person who files a complaint with a false certification is responsible for a civil violation of the MCFA. The person may be required to pay a civil fine of up to \$1,000.00 and some or all of the expenses incurred by the Michigan Department of State and the alleged violator as a direct result of the filing of the complaint.

Mail or deliver the completed complaint form and evidence to the following address:

Michigan Department of State
Legal and Regulatory Service Administration
Richard H. Austin Building - 4th Floor
430 West Allegan Street
Lansing, Michigan 48918



Riverview Residents Discussion Board - Riverview, Mi - New and Improved



Chuck Norton · Jul 21 ·

Don't make dinner Monday, July 24th. Join us at 6:30 pm at Vreeland park. Come "Chat with Chuck". All you need to bring is a lawn chair. We will have Pizza from Riverview Pizza Place and refreshments.

We are a grassroots campaign. We are a small town, we run our campaign as such. Leg work and volunteer... See more

Your Voice Matters!

Join Us for a Community "Chat with Chuck"

Monday, July 24th | 6:30 pm | Vreeland Park, Riverview, MI

**Enjoy Free Pizza & Refreshments!

Are you tired of the same old politics? Do you feel your concerns are not being addressed?

—Then it's time to ****Meet Your Potential Next Mayor****!

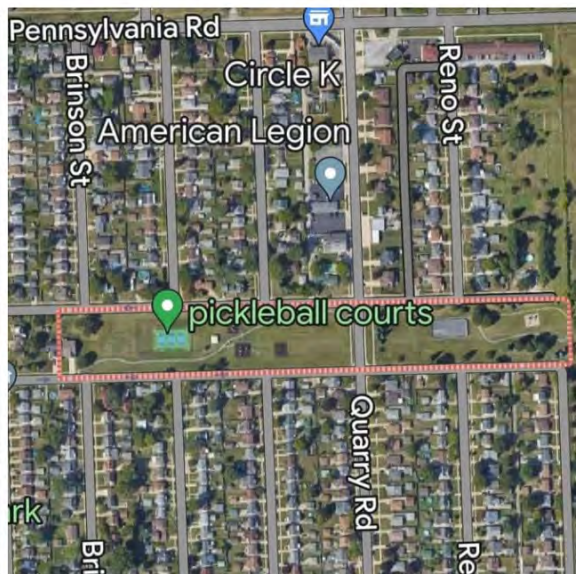
A dedicated ****Grassroots Group**** fighting for a Riverview that works for ****ALL**** of its residents.

This is not about us, this is about ****YOU****.

Share your questions, concerns, and ideas. We are here to listen, understand, and make sure your voice is heard at City Hall.

Together, we can build a Riverview that puts its residents first, where decisions are made based on what's best for the community, not the wealthy few.

Paid for by the committee to elect Chuck Norton for Mayor of Riverview



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Riverview Residents Discussion Board - Riverview, Mi - New and Improved



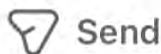
Chuck Norton · Jul 24 · 

"Chat with Chuck" this evening at Vreeland Park at 6:30 pm.

Pizza and refreshment just bring a lawn chair.



8 comments





Riverview Residents Discussion Board - Riverview, Mi - New and Improved



Chuck Norton · Aug 9 · 



Attention supporters of Chuck Norton for Mayor!



We kindly request that you refrain from discarding any campaign signs you may have. If keeping them for the upcoming election poses a storage issue, please know that we are more than willing to personally collect them from you.



As we operate on a tight budget, preserving these signs is of utmost importance to our campaign. Your support in this matter is greatly appreciated.

... See more



16

14 comments



Like



Comment



Send



Riverview Residents Discussion Board - Riverview, Mi - New and Improved



Chuck Norton · Aug 17 · 

Dear esteemed residents of Riverview,

I hope this message finds you well. I wanted to take a moment to inform you that I recently received news that my yard signs are permitted to remain on your private property within your property lines until after the upcoming November election. This includes both residential and commercial properties. However, it is crucial to note that these signs must be taken down after the election.

I am incredibly grateful for the support and enthusiasm that you have shown for the Chuck Norton for... [See more](#)



13



Riverview Residents Discussion Board -



Riverview, Mi - New and Improved

Chuck Norton · 3d · 

Good afternoon Riverview,

With just 53 days until the November 7th election, it's time for you to decide who will represent you as a council member and ultimately serve as the Mayor. I'm thrilled to have this opportunity.

Now is the time to get those Chuck Norton for Riverview Mayor signs back out.

PLEASE KEEP THOSE SIGNS OFF OF THE EASEMENTS.

One of the things that sets our city apart is our form of government, with a City Manager at the helm. As council members, our role is to set policy and approve the City Manager's direction. However, I believe that elected officials should have direct communication with constituents. I value accessibility, accountability, and fostering teamwork among residents. Please consider supporting our grassroots campaign for a better Riverview.

Feel free to call, text, or email any questions you may have.
(734) 512-6625

Nortoncj3339@gmail.com

Chuck Norton



Chuck Norton for Riverview Mayor



1h · 🌐

I hope everyone is having a great weekend!

Thankful for the coming rain tomorrow!

Who's ready for Summerfest starting Thursday. Perfect weather planned for the weekend.

Please stop by our booth!

[Chuck Norton for Riverview Mayor](#)

I want to work for you the residents!

Brian Webb and 5 others

2 comments

Like

Comment

Send



Riverview Residents Discussion Board - Riverview, Mi - New and Improved



Chuck Norton · 2d · 

The Pancakes, Hero's & Cheerios breakfast at Kinghaven has been postponed.
Sorry for the inconvenience.



2



Like



Comment



Send



Riverview Residents Discussion Board - Riverview, Mi - New and Improved



Chuck Norton · Jul 3 · 

Thank you to those residents that took the time to talk with me today.

I won't be out tomorrow. Tomorrow is all about our freedom. I will be at the [American Legion Post 389](#) thanking those that made sure we kept our freedom! Stop up and say hi. It starts at 12:30. The music starts at 1:00 pm.



3



Riverview Residents Discussion Board - Riverview, Mi - New and Improved



Chuck Norton · Jul 17 ·

As a candidate running for the esteemed position of Mayor in the city of Riverview, Michigan, it is my utmost pleasure to inform you that our meticulously developed YouTube channel has been successfully established and is fully operational. Recognizing the logistical challenges that hinder attendance to our "Chat with Chuck" meetings for all interested residents, I have taken the proacti... See more



youtube.com

July 17, 2023

**Riverview Forest Residents**

Chuck Norton · 14m ·

Thank you to all of the residents of the Forest subdivision who came to Young Patriots Park for our Chat with Chuck. I appreciate your questions and input. Together we will make this city better than what it already is. I am humbled by the great turnout tonight.



Like



Comment



Send



1

Top comments **Julie Seymour**

It was a very productive experience. I was very impressed with your commitment to transparency, accessibility and accountability.

9m Like Reply



**Riverview Residents Discussion Board -
Riverview, Mi - New and Improved**



Chuck Norton · Aug 5 · 

For those that are interested

[https://youtube.com/
@chucknorton7733](https://youtube.com/@chucknorton7733)



3



Like



Comment



Send



Riverview Residents Discussion Board - Riverview, Mi - New and Improved

Chuck Norton · Jun 16 · 📷

I love our city!

Riverview Mayor is at
Young Patriot's Park.

Just now · 🌐

Thank you to everyone that stopped by our booth today. I am totally humbled by the positive feedback and the amount of residents that shared with me and that I have their support. I truly appreciate all of you. Gina and I will be at our booth tomorrow from noon to close. The Orange tent is our tent. Stop by Chat with [Chuck Norton for](#)



4



Like



Comment



Send



Riverview Residents Discussion Board - Riverview, Mi - New and Improved



Chuck Norton · Jun 18 · 

Happy Father's Day to all of the fathers, step-fathers, and those moms pulling double duty.

I am humbled by the amount of residents that stopped our tent at Summerfest to show their support for me running for Mayor.

God Bless you all.



6



Like



Comment



Send

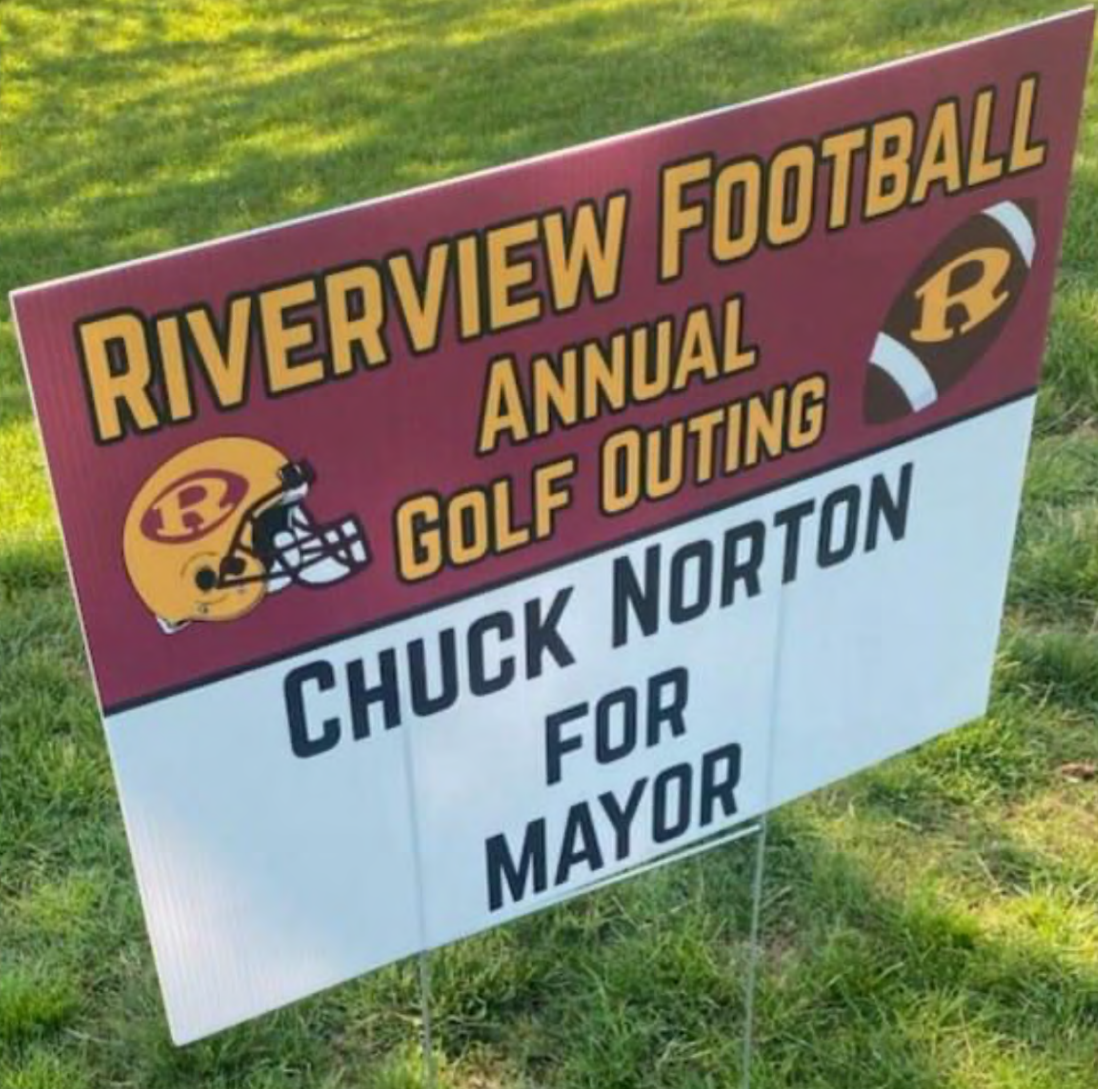


**Riverview Residents Discussion Board -
Riverview, Mi - New and Improved**



Chuck Norton · Jun 4 ·

Great way to start the day! I truly appreciate the support!





Riverview Residents Discussion Board - Riverview, Mi - New and Improved



Chuck Norton · Jun 6 · 

Good morning Riverview. I have been meeting with residents.

If you are intrested to have a "CHAT WITH Chuck Norton for Riverview Mayor "

I want everyone to know that I am willing to sit down and talk to anyone, that is willing to know why I want to be your Mayor.

Give me a call 734-512-6625.



1



Riverview Residents Discussion Board - Riverview, Mi - New and Improved



Chuck Norton · Jun 29 · 

Thank you to everyone that came out tonight for the Townhall meeting. It should be posted online to view soon.



Brian Webb and 10 others

4 comments



Like



Comment



Send



Riverview Residents Discussion Board - Riverview, Mi - New and Improved



Chuck Norton · Jun 30 · 

If I missed getting you a yard sign please let me know. I just found more metal stakes.
I truly appreciate the support.



8



Like



Comment



Send



Riverview Residents Discussion Board - Riverview, MI



Juliann Knowles-Testy · Jul 24 ·

Great turn out for this evenings Chat with Chuck.



33

7 comments

Like

Comment

Send



Riverview Residents Discussion Board - Riverview, Mi - New and Improved



Chuck Norton · Jul 2 · 

I would like to thank everyone that took the time to talk to me and accept my yard sign.
I will be coming to your street soon!

   18

10 comments

 Like

 Comment

 Send

1 Filters

Posts You've Seen

Most Recent

Posted by



7

3 comments



Like



Comment



Send



Riverview Residents Discussion Board - Riverview, Mi - New and Improved



Chuck Norton · Jul 11 ·

Greetings, my fellow citizens and community members of
Glen's Subdivision and all Riverview residents!

*****Thursday 6:00 pm-7:30 pm Glens Park*****

I hope this message finds you all in good spirits. My name is Chuck Norton, and I wanted to take a moment to share with you a few vital ideas that I deeply believe in as I set out on this journey to become your mayor. But before I continue, let me assure you that I am not your typical politician. My intentions are driven solely by a desire to create positive change in our beloved city.

As we are faced with the imminent challenge of our landfill reaching its capacity, I strongly believe that all of us must come together and work towards finding innovative solutions to generate revenue. Here are the three key principles that have guided me throughout this campaign:

1. Teamwork: I am a firm believer in the power of collaboration and unity. No single person holds all the answers, and by working together as a collective force, we can achieve extraordinary outcomes. I am committed to fostering an environment that promotes teamwork at all levels, involving our residents, small businesses, and employees in the decision-making processes that directly impact their lives.

2. Accessibility: One of the greatest issues with politicians today is their detachment from the day-to-day concerns of



Home



Friends



Video



Marketplace



Notifications



Menu



**Riverview Residents Discussion Board -
Riverview, Mi - New and Improved**



Chuck Norton · Jul 13 · 

Thank you to the residents that came out tonight to " Chat with Chuck"@ Glens Park.



13

10 comments



Like



Comment



Send





Jessica's post



Riverview Residents Discussion Board - Riverview, MI



Alyssa Rae · 3h ·

Chuck, my guy, you're making me blush 😊

Hi Neighbors!

The residents here at RC are standing together to have our voices heard and report the conditions here.
We want CHANGE and we want housing that is safe for our families!

If you have outstanding work orders, safety concerns, maintenance problems, issues with heat or leaks please call us so that we can document this with the City and clean this place up!

We are working with City council members to brainstorm on how to move forward.

Please report conditions in your home!
Call Chuck @ (734) 512-6625
Call or Text Melissa @ (734)341-0599

We invite you to meet with us, Tuesday 9-19-23 @ 6:30pm at the park on-site!

Pizza, soda, and water will be provided by Chuck! He wants to answer questions and listen to the resident's concerns.

51

12 comments



Like



Comment



Send



Chriss Knight



2h ·

Posts

Photos



Chuck Norton

Jul 21 · 🌐

Don't make dinner Monday, July 24th. Join us at 6:30 pm at Vreeland park. Come "Chat with Chuck". All you need to bring is a lawn chair. We will have Pizza from Riverview Pizza Place and refreshments.

We are a grassroots campaign. We are a small town, we run our campaign as such. Leg work and volunteers. Bring your questions and I will be more than happy to answer them.

If you haven't registered to vote yet. There is a QR code below. You can also request an absentee ballot.

📢 Your Voice Matters!

Join Us for a Community "Chat with Chuck"

Monday, July 24th | 6:30 pm | 📍 Vreeland Park, Riverview, NJ

— 🍕 **Enjoy Free Pizza & Refreshments! ** 🍕

Are you tired of the same old politics? Do you feel your concerns are not being addressed?

—Then it's time to **Meet Your Potential Next Mayor**!

A dedicated **Grassroots Group** fighting for a Riverview that works for ****ALL**** of its residents.

👤 This is not about us, this is about ****YOU****.

Ask your questions, concerns, and ideas. We are here to listen, understand, and make sure your voice is heard at City Hall.

Together, we can build a Riverview that puts its residents first, where decisions are made by the people.

USE THE QR CODE TO REGISTER

Home

Friends

9+

Video

Groups

4

Notifications

Menu



Samantha Richards is with **Chuck Norton**.



Jul 24 ·

Chat with Chuck at Vreeland park



55

2 comments





Riverview Residents Discussion Board - Riverview, MI



Chuck Norton · May 5 · 

Yard signs are ordered. Let us know if you would like one. Once they arrive we will personally deliver them to you.

VOTE FOR

Chuck Norton

Riverview Mayor

 Brenda Franzel-Valire and 13 others

35 comments

 Like

 Comment

 Send



Riverview Residents Discussion Board -

Riverview, MI

Kristie Pugh · Aug 11 ·

Go Chuck! for making it more affordable for the ice creams trucks to come to Riverview



Dave Pray and 157 others

45 comments



Like



Comment



Send



Holly Koslowski is at Vreeland Park.



Admin Jul 24 · Riverview · 

Chuck Norton speaking at Vreeland Park 7/24/23.




  53

29 comments


 Like

 Comment

 Send



Juliann Knowles-Testy

Top contributor 2h · 

Good Evening Forest Neighbors. Please note there will be a Chat with [Chuck](#) Session tomorrow Sept 21 at 6:30. Young Patriots Park. Look for the orange tent. Enjoy free pizza and beverages while sharing your comments, questions or concerns with Chuck Norton for Riverview Mayor. Please bring a lawn chair.


1. ACCOUNTABILITY 2. TEAMWORK 3. TRANSPARENCY

Vote

CHUCK

NORTON

FOR RIVERVIEW MAYOR







Riverview Residents Discussion Board - Riverview, Mi - New and Improved



Chuck Norton · Jun 20 · 

Yard signs have arrived today!
Chuck Norton for Riverview Mayor.
Let us know if you would like one.

Nortonforriverviewmayor.com



nortonforriverviewmayor.com

Home | Norton For Riverview



1 comment



Riverview Residents Discussion Board - Riverview, Mi - New and Improved



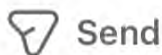
Chuck Norton · Jul 24 · 

"Chat with Chuck" this evening at Vreeland Park at 6:30 pm.

Pizza and refreshment just bring a lawn chair.



8 comments





STATE OF MICHIGAN
JOCELYN BENSON, SECRETARY OF STATE
DEPARTMENT OF STATE
LANSING

October 3, 2023

CTE Chuck Norton c/o Chuck Norton
14617 Shenandoah
Riverview, MI 48193

Re: *Chittum v. Committee to Elect Chuck Norton*
Campaign Finance Complaint No. 23-075

Dear Committee to Elect Chuck Norton:

The Department of State (Department) has received a formal complaint filed against you by Brett Chittum alleging that you violated the Michigan Campaign Finance Act (MCFA or Act). Specifically, the complaint alleges that you have not filed the appropriate financial statements after spending more than \$1,000 in expenditures on yard signs, banners, flyers, events, and other campaign events. A copy of the complaint is included with this notice.

The MCFA requires committees file contributions and expenditures with the appropriate filing official by specific dates. MCL 169.233(1) – (3). The Act requires a committee that receives or expends more than \$1,000 during any election to file campaign finance reports in compliance with the act. MCL 16.233(6). A person who knowingly omits or underreports expenditures required to be disclosed by the Act is subject to a civil fine of not more than \$1,000 or the amount of the expenditures omitted or underreported, whichever is greater. MCL 169.233(11).

The Department has independently verified that, as of September 26, 2023, no campaign finance statements have been filed or posted on the Wayne County campaign finance website.

The purpose of this letter is to inform you of the Department's examination of these matters and your right to respond to the allegations before the Department proceeds further. It is important to understand that the Department is neither making this complaint nor accepting the allegations as true. The investigation and resolution of this complaint is governed by section 15 of the Act and the corresponding administrative rules, R 169.51 *et seq.* An explanation of the process is included in the Department's campaign finance complaint [guidebook](#).

If you wish to file a written response to this complaint, you are required to do so within 15 business days of the date of this letter. Your response may include any written statement or additional documentary evidence you wish to submit. Materials may be emailed to BOERegulatory@michigan.gov or mailed to the Department of State, Bureau of Elections, Richard H. Austin Building, 1st Floor, 430 West Allegan Street, Lansing, Michigan 48918. If you

fail to submit a response, the Department will render a decision based on the evidence furnished by the complainant.

A copy of your answer will be provided to Brett Chittum, who will have an opportunity to submit a rebuttal statement to the Department. After reviewing the statements and materials provided by the parties, the Department will determine whether “there may be reason to believe that a violation of [the MCFA] has occurred [.]” MCL 169.215(10). Note that the Department’s enforcement powers include the possibility of entering a conciliation agreement, conducting an administrative hearing, or referring this matter to the Attorney General for enforcement.

If you have any questions concerning this matter, you may contact the Regulatory Section of the Bureau of Elections at BOERegulatory@Michigan.gov.

Sincerely,

Regulatory Section
Bureau of Elections
Michigan Department of State

Enclosure
c: Brett Chittum

JAMES J. MAKOWSKI

Attorney & Counselor

Makowski Legal Group, PLC
6528 Schaefer Road
Dearborn, MI 48126
313.434.3900 phone
734.638.6000 fax

October 13, 2023

Via Electronic Mail BOERegulatory@michigan.gov

Michigan Department of State
Bureau of Elections
Richard H. Austin Building, 1st Floor
430 W. Allegan Street
Lansing, MI

Re: *Chittum v. Committee to Elect Chuck Norton*
Campaign Finance Complaint 23-075

To Whom It May Concern:

Please be advised I represent the Committee to Elect Chuck Norton in reference to the above referenced campaign finance complaint.

As you are aware, MCL 169.204(3)(b) exempts from contributions, "Food and beverages, not to exceed \$1,000.00 in value during a calendar year, that are donated by an individual and for which reimbursement is not given." There have been four (4) events in which pizza and soft drinks were served. The pizzas and soft drinks for each event were donated by individuals and the sum total spent was less than \$500.00 upon information and belief.

Mr. Norton has not exceeded the disclosure limit of \$1,000.00 on his campaign. If, at some point, my client does exceed this amount, he will most assuredly file the appropriate reports and disclosures.

Please feel free to contact this office if you have any further questions.

Very truly yours,



James J. Makowski

CC: Mr. Chuck Norton



STATE OF MICHIGAN
JOCELYN BENSON, SECRETARY OF STATE
DEPARTMENT OF STATE
LANSING

October 31, 2023

Brett Chittum
13853 Heritage St
Riverview, MI 48193

Re: *Chittum v. Norton*
Campaign Finance Complaint No. 23-075

Dear Mr. Chittum:

The Department of State received a response from James Makowski on behalf of Mr. Norton to the complaint you filed against him alleging a violation of the Michigan Campaign Finance Act, 1976 P.A. 388, MCL 169.201 *et seq.* A copy of the response is provided as an enclosure with this letter.

You may file a rebuttal statement after reviewing the enclosed response. If you elect to file a rebuttal statement, you are required to do so within 10 business days of the date of this letter. The rebuttal statement may be emailed to BOERegulatory@Michigan.gov or mailed to the Department of State, Bureau of Elections, Richard H. Austin Building, 1st Floor, 430 West Allegan Street, Lansing, Michigan 48918.

Sincerely,

Regulatory Section
Bureau of Elections
Michigan Department of State

Enclosure
c: Chuck Norton c/o James Makowski

Brett M Chittum
Concerned Citizen of Riverview, MI

Brett M Chittum
13853 Heritage St
Riverview, MI 48193

November 4, 2023

Via Electronic Mail BOERegulatory@michigan.gov

Michigan Department of State
Bureau of Elections
Richard H. Austin Building, 1st Floor
430 W. Allegan Street
Lansing, MI 48918

Re: Chittum v. Committee to Elect Chuck Norton
Campaign Finance Complaint 23-075

To The Michigan Department of State,

My original complaint, dated 9/24/23, noted that the violation that was committed was from *MFCA Section 169.233 Act 388 of 1976* and stated this: *"I believe that this candidate, who has a current Reporting Waiver (as of 09/24/2023), has spent over the amount to have this waiver and is in violation of not reporting and having full disclosure and transparency into his finances. He has hundreds of yard signs out in the neighborhood, multiple meet and greets where he provided food, supplied multiple "Vote for Chuck Norton" t-shirts that he handed out, had flyer handout events where he has handed out hundreds of flyers, a booth at local events where there is a banner with his information, and sponsorship of a golf outing. Most if not all, of which happened prior to the primary election."*

The letter notifying the *Committee to Elect Chuck Norton*, dated 10/3/23, reiterated my complaint and stated the same MCFA MCL number that I had cited on the original complaint. A letter from you, dated 11/31/23, in response to the original complaint, stated the rebuttal from the attorney of Mr. Norton only addressed *"Michigan Campaign Finance Act, 1976 P.A. 388, MCL 169.201 et seq"*, which was not what my original complaint was even about. Mr. Norton's attorney stated in that letter *"As you are aware, MCL 169.204(3)(b) exempts from contributions, "Food and beverages, not to exceed \$1,000.00 in value during a calendar year, that are donated by an individual and for which reimbursement is not given." There have been four (4) events in which pizza and soft drinks were served. The pizzas and soft drinks for each event were donated by individuals and the sum total spent was less than \$500.00 upon information and belief."* Which does not even address the complaint in its entirety and goes on to say; *"Mr. Norton has not exceeded the disclosure limit of \$1,000.00 on his campaign. If, at some point, my client does exceed this amount, he will most assuredly file the appropriate reports and disclosures."*

My original complaint was concerning the "Reporting Waiver" on Mr. Norton's Candidate Committee Statement, which is still active as of the date of this letter, in where his campaign will not have expenditures of over \$1000, and at the time he does go over, he will then file an amendment. I would like to thank Mr. Norton's attorney for at least giving potential monetary value on the money spent on

some of his events, but as of the date of his letter, there have really been 6 events, none the less, thank you for giving some account.

But the matter of this is not just the food, but all that is included in Mr. Norton's campaign, which would include "All" expenditures, including food. Based on Mr. Norton's attorney admission, there was at least \$500 spent on food for events. I have personally driven around the city and counted his signs, which are still over 75 signs as of the date of this letter. But to add to his sign count, on Facebook it was announced that there were 50 signs missing from residences and a report was filed with the Riverview City Police Department stating *"10/11/2023 : 16:45:43 bbemis4 Narrative: political signs stolen from private property, Vote for Norton.. caller states he has lost approximately 50 signs, from various locations, since the campaign started.. unknow suspect."* With this information I would derive that there are at least 125 signs that were purchased. Along with the flyers, t-shirts, banners, sponsorships, business cards, and others, it is inconceivable that Mr. Norton and his campaign have not spent over \$1000 to date, most prior to the primary election.

I stand by my original statement, and the evidence presented even more so with what I have presented in this letter. Mr. Norton and his campaign still refuse to follow the law, even when presented with the evidence and a letter from the Department of State, he still denies these allegations. Per Campaign Finance Regulations, a candidate, even when under Waiver, must keep records of all expenditures. I ask that you continue this investigation and please investigate his financial accounts. With his persistent denial of this complaint, I ask that there be no lenience given, and that he is prosecuted to the full extent of the law.

Thank You,

A handwritten signature in black ink, appearing to read "Brett M Chittum", with a long horizontal flourish extending to the right.

Brett M Chittum

From: [Brett Chittum](#)
To: [MDOS-BOERegulatory](#)
Subject: Re: Chittum v. Norton Campaign Finance Complaint No. 23-075
Date: Saturday, November 4, 2023 4:34:03 PM

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

And to add to this, Mr. Norton has hired an attorney which should also be considered under his expenditures.

Sent from my iPhone

Brett Chittum

On Nov 4, 2023, at 10:00 AM, Brett M Chittum <bchittum1@comcast.net> wrote:

Please see attached, my rebuttal to Mr. Norton and the Department of State.

Brett Chittum
bchittum1@comcast.net
206-459-6360 cell

From: [MDOS-BOERegulatory](#)
Sent: Tuesday, October 31, 2023 3:35 PM
Subject: Chittum v. Norton Campaign Finance Complaint No. 23-075

Please see the attached.

Bureau of Elections, Regulatory Section
Michigan Department of State
Secretary of State Jocelyn Benson
P.O. Box 20126
Lansing, Michigan 48901

<2023-11-4 Rebuttal Letter Mr Chittum.pdf>



STATE OF MICHIGAN
JOCELYN BENSON, SECRETARY OF STATE
DEPARTMENT OF STATE
LANSING

January 23, 2024

James J. Makowski
6528 Schaefer Rd.
Dearborn, MI 48126

CTE Chuck Norton c/o Chuck Norton
14617 Shenandoah
Riverview, MI 48193

Re: *Chittum v. Committee to Elect Chuck Norton* Campaign Finance Complaint No. 23-075

Dear Mr. Makowski:

The Department of State (Department) has finished investigating the campaign finance complaint filed against Mr. Norton by Mr. Chittum alleging a violation of the Michigan Campaign Finance Act (MCFA or Act). This letter concerns the disposition of that complaint.

The complaint alleged that Mr. Norton spent an amount in excess of \$1,000 and was required to file campaign finance statements with the county.

You responded to the complaint. In your response, you claimed Mr. Norton didn't spend in excess of the \$1,000 but subsequent receipts submitted by Mr. Norton showed that he exceeded the \$1,000 and should have filed a campaign finance statement.

Mr. Chittum provided a rebuttal statement. In that statement, he reasserted his complaint that he believes Mr. Norton exceeded \$1,000 in his campaign.

The MCFA requires committees file contributions and expenditures with the appropriate filing official by specific dates. MCL 169.233(1) – (3). The Act requires a committee that receives or expends more than \$1,000 during any election to file campaign finance reports in compliance with the act. MCL 16.233(6). A person who knowingly omits or underreports expenditures required to be disclosed by the Act is subject to a civil fine of not more than \$1,000 or the amount of the expenditures omitted or underreported, whichever is greater. MCL 169.233(11).

The Department has reviewed the evidence submitted in this matter and finds that sufficient evidence has been presented to support a finding of a potential violation of the MCFA. The receipts that Mr. Norton submitted exceed the \$1,000 threshold that requires filing campaign finance statements. Additionally, the sponsorship for the Riverview Community High School

Chuck Norton

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Football Booster would be considered an in-kind contribution that needs to be filed when you file your campaign statements.

This letter serves to notify you and your clients that the Department has determined that Mr. Norton has violated by MCFA by not filing campaign finance statements. If Mr. Norton files the appropriate campaign finance reports with the county then the Department will consider a warning sufficient and consider this matter resolved. "If, after 90 business days, Mr. Norton's campaign finance statements remain unfiled, the secretary of state shall do either of the following:

- (a) Refer the matter to the attorney general for the enforcement of any criminal penalty provided by this act.
- (b) Commence a hearing as provided in subsection (11) for enforcement of any civil violation." MCL 169.215(11).

Please contact the undersigned at BOERegulatory@Michigan.gov when the appropriate campaign finance statements have been filed with the county.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jimmy Biehl". The signature is written in a cursive, flowing style.

Jimmy Biehl, Regulatory Attorney
Regulatory Section
Bureau of Elections
Michigan Department of State

c: Brett Chittum