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ATTORNEY CLIENT PRIVILEGED INFORMATION

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

Reset 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 Daniel C. Devine, Jr.	Daytime Telephone Number 248-892-7803	
Mailing Address 4511 Lakeview Ct.		
City Bloomfield Hills	State MI	Zip 48301

Section 2. Alleged Violator		
Name Leo C. Savoie		
Mailing Address 3883 S. Miller Way		
City Bloomfield Hills	State MI	Zip 48301

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

Section(s) of the MCFA violated: Section 169.254, Sec 54, (1) and Section 169.254 and Sec. 54 (2), Section 169.254, Sec. 54, (4) and under Appendices, Appendix O Prohibited Contributions as explained therein.

Explain how those sections were violated:

More than 30 business days have elapsed since the time of the donation without any documentation to evidence return of same.

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

See attachments

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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

Daniel C. DeWitt
Signature of Complainant

08/15/14

Date

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

Section 15(6) of the MCFA (MCL 169.215) requires 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:

See attached statement

X

Daniel C. DeWitt
Signature of Complainant

08/15/14

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
Bureau of Elections
Richard H. Austin Building – 1st Floor
430 West Allegan Street
Lansing, Michigan 48918

Statement in support of factual contentions made under Section 5 of the attached Michigan Department of State Campaign Finance Complaint Form:

On Friday, May 9, 2014, the Committee to Retain Leo Savoie Bloomfield Township Supervisor, Committee I.D. Number 95490, filed with the Elections Division of the Oakland County Clerk's office, received a contribution in the amount of \$2,500.00 from a corporation: Hubbell, Roth & Clark, Inc., P.O. Box 824, Bloomfield Hills, MI 48303.

The tender and receipt of said contribution was intended to improperly influence the sponsorship and passage of a controversial and procedurally improper award of a sewer contract for the Upper Long Lake Estates Long Pointe Drive Sanitary Sewer Extension which was placed on the Monday, May 12, 2014 Bloomfield Township Board of Trustees meeting agenda by Bloomfield Township Supervisor Leo C. Savoie whose candidate committee was the recipient of said contribution the immediate Friday before the meeting.

Bids for said contract were solicited by Bloomfield Township's Engineering Department with the assistance and review of the donor of said contribution, Hubbell, Roth & Clark, Inc., without prior knowledge or authorization of the Bloomfield Township Board of Trustees in violation of past practice and procedure and in violation of Bloomfield Township's Purchasing Policy. (See attached policy)

The award of said sewer contract was finally approved on a split vote by the Bloomfield Township Board of Trustees at a subsequent meeting held on June 23, 2014 after many members of the public spoke both in favor and in opposition of the sewer project.

Allegations of wrongdoing were leveled by the public against members of the Bloomfield Township Board of Trustees, the Engineering Department and Hubbell, Roth & Clark at the time of the initial meeting on the topic, subsequent public meetings and throughout the final Bloomfield Township Board of Trustees meeting on the topic held on July 14, 2014. All of these public meetings are available for viewing in their entirety on video through the Bloomfield Township website.

Throughout the entire controversy, Bloomfield Township Supervisor Leo C. Savoie claimed that there was no wrongdoing on his part and that all he wanted to do was to do something nice for some people.

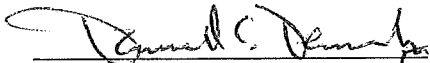
Supervisor Savoie never disclosed the fact that his campaign committee had received a \$2,500.00 contribution a mere 3 days before he brought forward the sewer contract for approval wherein the donor, Hubbell, Roth & Clark, Inc. stood to gain monetary reward from their scope as consulting engineers on the sewer project. Supervisor Savoie is not even up for election until 2016 so the timing of the contribution is even more suspect and he was surprised that he had to file a campaign committee statement by July 25, 2014 as required by the amended campaign laws. Otherwise the contribution would not have been disclosed to the public until January 31, 2015 as per the old law. The dust would have settled by then and the sewer project would have been completed.

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Bloomfield Township Supervisor Savoie had ample time to reconsider the receipt of the campaign contribution in order to return it within 30 days of receipt. At a minimum, Supervisor Savoie had a duty to disclose to the Bloomfield Township Board of Trustees and to the public his receipt of the contribution and to recuse himself from any vote on the topic of the sewer project. He had ample time and opportunity to do so throughout the several public meetings on the issue. He chose rather to deny any improper conduct and continued to advocate for the award of the sewer contract until he finally had the bare majority votes of the Bloomfield Township Board of Trustees necessary to proceed with the sewer project.

On the face of the facts, it appears that a bribe was tendered by Hubbell, Roth & Clark, Inc. and received by Bloomfield Township Supervisor Leo C. Savoie through his campaign committee in order to secure passage of approval for the Long Pointe Drive Sewer project in contravention of the statutes of the State of Michigan and in violation of the public trust.

I respectfully request that the Secretary of State and the Attorney General for the State of Michigan investigate these matters to determine the extent of wrongdoing, if any, by Bloomfield Township Supervisor Leo C. Savoie, his campaign committee and Hubbell, Roth & Clark, Inc. and to render the appropriate civil and/or criminal justice required by law and expected by the public.


DANIEL C. DEVINE, JR.
Signature of Complainant

08/14/15