



Ivan Assenov
Scale Campaign
616 439 4102
ivan@scalecampaign.com

OFFICE OF
GENERAL COUNSEL
2020 MAR -9 AM 11:44

February 29 2020

Office of Complaints Examination and Legal Administration

Att: Christal Dennis, Paralegal

CELA@fec.gov

Federal Election Commission
1050 First Street, NE
Washington, DC 20463

Via Paper and via Email

Supplement

RE:MUR 7633

Mrs Christal :

I would like to report an update for MUR 7633 regarding alleged violation from TOM Norton for Congress campaign.
Since I filed the original complain, I filed three separate small claims against Tom Norton for Congress in 63rd district court of Michigan.

For two of them

[D19C06805](#)

[D19C06806](#)

I now have final default judgment in favor of my company Scale Campaign by judge Smolenski. An appeal for both cases was rejected by circuit judge Rossi.

I am including the final decisions for both of them.



Ivan Assenov
Scale Campaign
616 439 4102
ivan@scalecampaign.com

The third small claim is still in process

[D19C07607](#)

In addition I would like to add additional information that came up during the court cases. The defendant Tom Norton for Congress insisted in paper and in front of public hearing that they have different address than what is listed on FEC.GOV and using that managed to add additional hearings, expenses in my way, and even brought it to circuit court by declaring that they never been properly served.

We properly subpoenaed the defendant using the disclosed FEC mailing address as it was listed on his committee: 4208 Pettis Ave Ada, MI

The screenshot shows a web browser window with the URL <https://www.fec.gov/data/committee/C00704270/tab=about+commit>. The page displays the following information:

Committee information	
Committee name:	TOM NORTON FOR CONGRESS
Mailing address:	4208 PETTIS AVE. ADA, MI 48301
Treasurer:	FUSS, JEFF
Committee type:	House
Statement of organization:	Current version (PDF) FEC-1328901 Filed 04/26/2019
Authorizing candidate:	NORTON, THOMAS JOHN House candidate Michigan - 03 Republican Party

Instead, Norton's campaign swear that their mailing address was 1071 Chippewa St, Zeeland MI. I am attaching their statement about the address as well.



Ivan Assenov
Scale Campaign
616 439 4102
ivan@scalecampaign.com

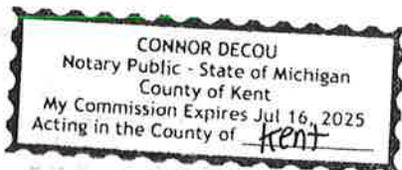
I hope that information will help you during the preliminary procedures

X

Feb 21 2020

Ivan Assenov
Scale Campaign, member

Signed and sworn to before me, Connor DeCou.



The plaintiff has no contract
for compensation with Defendant.

Case # D19C 08594

Improper address used for original
service.

Please send all notifications to :

Jewison ME 49428

Jeff Fress

Tom Nardoni for Congress.

12/31/19

[Signature] 9:56 AM

Received & Filed

DEC 31 2019

63rd DISTRICT COURT

Approved, SCAO

RECEIVED FEB 19 2020

Original - Circuit court
1st copy - District court/agency
2nd copy - Appellant
3rd copy - Appellee

STATE OF MICHIGAN
17TH JUDICIAL CIRCUIT
KENT COUNTY

ORDER DISMISSING APPEAL

CASE NO.
19-11452-AV

Court address
180 OTTAWA AVE NW GRAND RAPIDS, MI 49503

Court telephone no.
(616) 632-5480

Plaintiff's name(s), address(es), and telephone no(s). Appellant
SCALE CAMPAIGN

Defendant's name(s), address(es), and telephone no(s). Appellant
TOM NORTON FOR CONGRESS

4208 PETTIS AVE
ADA, MI 49301

v

Plaintiff's attorney, bar no., address, and telephone no.
THOMAS J. GEZON P24066

Defendant's attorney, bar no., address, and telephone no.

4250 CHICAGO DR SW STE B
GRANDVILLE, MI 49418-1506

THE COURT FINDS:

- 1. The appellant was sent a notice of deficiency on 01/22/2020 after the notice was served. Date and did not remedy the deficiency within 14 days
- 2. The parties stipulated to dismissal of the appeal.
- 3. The appellant filed an unopposed motion to withdraw the appeal.
- 4. The appellant failed to pursue the appeal in conformity with the Michigan Court Rules.
- 5. The appeal was vexatious.
- 6. The court does not have jurisdiction.
- 7. Other: _____

IT IS ORDERED:

- 8. The appeal is dismissed.
- 9. Damages are assessed as follows: _____

FEB 13 2020

Date

J. JOSEPH ROSSI

Judge

Bar no.

CERTIFICATE OF MAILING

I certify that on this date I served a copy of this order on the parties or their attorneys and on the trial court or agency by first-class mail addressed to their last-known addresses as defined by MCR 2.107(C)(3).

2-17-2020

Date

AMY MOILANEN

Signature

Approved, SCAO

Original - Circuit court
1st copy - Appellant
2nd copy - Appellee

STATE OF MICHIGAN
JUDICIAL DISTRICT
17TH JUDICIAL CIRCUIT

NOTICE OF INTENT TO DISMISS APPEAL

RECEIVED
JAN 27 2020

CASE NO.
19-11452-AV

Court address
180 OTTAWA AVE NW STE 2400 GRAND RAPIDS, MI 49503

Court telephone no.
(616) 632-5480

Plaintiff's name, address, and telephone no. Appellant
SCALE CAMPAIGN

Defendant's name, address, and telephone no. Appellant
TOM NORTON FOR CONGRESS
4208 PETTIS AVE
ADA, MI 49301

Plaintiff's attorney, bar no., address, and telephone no.
THOMAS J. GEZON P24066
4250 CHICAGO DR SW STE B
GRANDVILLE, MI 49418-1506

Defendant's attorney, bar no., address, and telephone no.

TO THE APPELLANT:

Your appeal is deficient for failure to file the following within the time required by the Michigan Court Rules, and the court has not entered an order to extend that time.

- Transcript
- Proof of service
- Brief
- Other: _____

Rec'd & Filed
JAN 22 2020
KENT COUNTY
CIRCUIT COURT

Your appeal will be dismissed unless you file the required documents with this court within 14 days of the date this notice was mailed.

January 22, 2020
Date

Amy Milanen
Deputy Court Clerk

CERTIFICATE OF MAILING

I certify that on this date I served a copy of this notice on the parties or their attorneys by first-class mail addressed to their last-known addresses as defined in MCR 2.107(C)(3).

January 22, 2020
Date

Amy Milanen
Signature

SCALE CAMPAIGN LLC// v TOM NORTON FOR CONGRES CASE#: D19C06806 PAGE: 2

DATE	ACTIONS, JUDGMENTS, CASE NOTES	INITIALS
	MOTION FEE PAID \$20.00 RCPT # D295732	JAZ
	CHANGING JUDGE OF RECORD TO GO ALONG WITH CASE NUMBER D19C06805 FOR UPCOMING HEARING.	CEH
	JUDGE OF RECORD/MAGISTRATE CHANGED	CEH
	FROM: 38789 O'HARA, JEFFREY J	CEH
	TO: 35119 SMOLENSKI, SARA J	CEH
ALL	MOTION TO SET ASIDE DEFAULT JUD SCHEDUSMOLENSKI, SARA P-35119	CEH
	12/31/19 09:00A	
	D01 PREV. 4208 PETTIS AVE	CEH
	ADDR: ADA MI 49301	CEH
	D01 PREV. 1091 CHIPPEWA ST	CEH
	ADDR: JENISON MI 49428	CEH
12/09/19		
P01		
12/31/19	APPEARANCE FILED (W/POS)	GEZON, THOMAS J. P-24066 ALF
ALL		
ALL		
	MOTION TO SET ASIDE DEFAULT JUD HELD	ALF
	HEARING AMANDA DUBAY, CER#5136 HELD	ALF
	DEFS MTN TO SET ASIDE RESPECTFULLY DENIED	ALF
	ATTNY GEZON TO PREPARE ORDER	ALF
	CIVIL-OTHER PAID \$25.00 RCPT # D298018	JAZ
	TRUST POSTED \$200.00 RCPT # D298018	JAZ
	CREDIT CARD TENDERED	JAZ
01/06/20		
	DEF FILED CLAIM OF APPEAL-FILE IN OPEN	ALF
	WAITING FOR TRANSCRIPTS TO SEND TO CIRCUIT	ALF
01/13/20		
	NOTICE OF SUB UNDER 7DAY FILED-ORDER DENYING	ALF
	MTN TO SET ASIDE DEFLT	ALF
	NOTICE SEVEN DAY RULE FILED	ALF
P01		
01/29/20		
D01		
02/05/20	ORDER TO SET ASIDE DEFAULT JUD DENIED	ALF
	POS FOR ORDER DENYING MTN TO SET ASIDE DEFLT	ALF
	FILED	ALF
02/20/20		
	ORDER DISMISSING APPEAL FILED FROM CIRCUIT	ALF
02/26/20		
	ORDER ON APP FOR LEAVE TO APPEAL DENIED	ALF

***** END OF REGISTER OF ACTIONS ***** 02/27/20 08:51

STATE OF MICHIGAN 63RD JUDICIAL DISTRICT	REGISTER OF ACTIONS	CASE NO: D19C06805 GC STATUS: CLSD
Court Address 1950 E BELTLINE AVE NE GRAND RAPIDS MI 49525		Court Telephone (616) 632-7770 P-35119
JUDGE OF RECORD: SMOLENSKI, SARA J.,		

P01 PLAINTIFF SCALE CAMPAIGN LLC// 3168 BECKIE DR SW WYOMING MI 49418 (616) 394-4102	(CLSD)	Attorney P-24066 GEZON, THOMAS J., 4250 CHICAGO DR SW STE B GRANDVILLE MI 49418 (616) 667-2217
D01 DEFENDANT TOM NORTON FOR CONGRESS// 1071 CHIPPEWA ST JENISON MI 49428 (616) 813-1198	(CLSD)	

TRUST HISTORY:

PTY	RCPT DT	NO.	ACTION	TYPE	CHECK	AMOUNT	STAT	CLRK
D01	12/31/19	D298019	12/31/19	TRUST/ESCROW		200.00	OPEN	JAZ
DATE	ACTIONS, JUDGMENTS, CASE NOTES							INITIALS
08/02/19	P01		AFFDV & CLM FILED					DLM
			P01 PREV. NAME:					DLM
			SCAKE CANOAUGB LLC//					DLM
			FILING FEE PAID	\$30.00	RCPT # D285188			DLM
			CHECK TENDERED 1015					DLM
08/06/19			JUDGE OF RECORD/MAGISTRATE CHANGED					DLM
			FROM: 35119 SMOLENSKI, SARA J					DLM
			TO: 36374 MILROY, MICHAEL J					DLM
	P01		AFFDV & CLM SMALL CLAIMS ISSUED			\$574.88		DLM
	ALL		HEARING SMALL CLAIMS SCHEDULED (KO)			ATE MILR # 2635		DLM
			09/10/19 09:00A					
08/22/19	ALL		HEARING SMALL CLAIMS ADJOURNED					DLM
			09/10/19 09:00A					DLM
	ALL		HEARING SMALL CLAIMS SCHEDULED					DLM
			09/26/19 09:30A					DLM
	D01		NOTICE TO APPEAR ISSUED					DLM
08/25/19	D01		AFFDV & CLM PERSONALLY SERVED			\$35.57		DLM
09/23/19	D01		JUDGMENT SMALL CLAIMS ISSUED					KMO
09/25/19			P01 PREV. NAME:					DLM
			SCALE CANOAUGB LLC//					DLM
	D01		JUDGMENT SMALL CLAIMS ISSUED					DLM
09/26/19	ALL		ORDER FOR REMOVAL TO GEN CIVIL ENTERED					DLM
09/27/19			JUDGE OF RECORD/MAGISTRATE CHANGED					DLM
			FROM: 36374 MILROY, MICHAEL J					DLM

SCALE CAMPAIGN LLC// v TOM NORTON FOR CONGRES CASE#: D19C06805 PAGE: 2

DATE	ACTIONS, JUDGMENTS, CASE NOTES	INITIALS
	TO: 35119 SMOLENSKI, SARA J	
	TRANSFERRED FROM CASE # D19C05433	DLM
10/11/19		DLM
D01	DEFAULT ISSUED	
11/01/19		KMO
D01	JUDGMENT BY DEFAULT ENTERED	
11/25/19		CEH
D01		\$640.45
11/26/19	MOTION TO SET ASIDE DEFAULT JUD FILED	CEH
	MOTION FEE PAID \$20.00 RCPT # D295731	JAZ
ALL	MOTION TO SET ASIDE DEFAULT JUD SCHEDUSMOLENSKI, SARA P-35119	CEH
	12/31/19 09:00A	
	D01 PREV. 4208 PETTIS AVE	CEH
	ADDR: ADA MI 48301	CEH
12/10/19		
P01	APPEARANCE FILED	
12/31/19		GEZON, THOMAS J. P-24066
ALL		CEH
ALL	MOTION TO SET ASIDE DEFAULT JUD HELD	ALF
	HEARING AMANDA DUBAY, CER#5136 HELD	ALF
	DEFS MTN TO SET ASIDE RESPECTFULLY DENIED	ALF
	ATTNY GEZON TO PREPARE ORDER	ALF
	CIVIL-OTHER PAID \$25.00 RCPT # D298019	JAZ
	TRUST POSTED \$200.00 RCPT # D298019	JAZ
	CREDIT CARD TENDERED	JAZ
01/06/20		
	CLAIM OF APPEAL FILED	
01/08/20		CEH
	CASE LOCATED IN "CASE UNDER ADVISEMENT" DRAWER	
	UNTIL TRANSCRIPT IS RECEIVED	CEH
01/13/20		CEH
P01	MOTION SEVEN DAY RULE FILED (1/20/20)	
01/29/20		CEH
P01	MOTION SEVEN DAY RULE GRANTED	
D01	MOTION TO SET ASIDE DEFAULT JUD DENIED	CEH
02/03/20		CEH
	POS	
02/20/20		CEH
	RECEIVED ORDER DISMISSING APPEAL FROM CIRCUIT	CEH
	COURT. "THE APPELLANT WAS SENT A NOTICE OF	CEH
	DEFICIENCY ON 1/22/20 AND DID NOT REMEDY THE	CEH
	DEFICIENCY WITHIN 14 DAYS AFTER THE NOTICE	CEH
	WAS SERVED	CEH

***** END OF REGISTER OF ACTIONS ***** 02/27/20 08:50