


<b>STATE OF MICHIGAN</b> <b>54A JUDICIAL DISTRICT</b> <b>30TH JUDICIAL CIRCUIT</b>	<b>COMPLAINT</b> <b>FELONY</b>	<b>DISTRICT:</b> <b>CIRCUIT:</b> <b>CTN:</b> 96-24900007-01 <b>MSP #:</b> 2022-0355062-A
District Court ORI: MI330075J	Circuit Court ORI: MI330055J	AG ORI: MI820025A

<b>THE PEOPLE OF THE STATE OF MICHIGAN</b>	Defendant's name and address V <b>SANDRA BAXTER</b> 	Victim or complainant <b>STATE OF MICHIGAN</b>
Co-defendant(s) (If known)		Complaining Witness <b>S/A JENNIFER KAPUSHINSKI</b>
City/Twp./Village <b>City of Lansing</b>	County in Michigan <b>INGHAM</b>	Date: On or about <b>03-10-2023</b>
Defendant TCN	Defendant CTN <b>96-24900007-01</b>	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:
Police agency report no. <b>2022-0355062-A</b>	Charge <b>See below</b>	Vehicle Type
		Defendant Sex <b>F</b>
		Defendant Race
		Maximum penalty <b>See below</b>

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

**STATE OF MICHIGAN COUNTY OF INGHAM**

The complaining witness says that on the date above and in Lansing, Michigan, the defendant, contrary to law,

**COUNT 1: PROSECUTORS INVESTIGATIVE SUBPOENAS - PERJURY**

did knowingly make a false statement under oath in an examination conducted by a prosecuting attorney pursuant to a subpoena issued to investigate the commission of Conspiracy to Do a Lawful Act in an Unlawful Manner, by testifying as follows: that she did not have direct contact with Mike Shirkey about helping out with donations for Unlock Michigan; and/or she did not do fundraising for Mike Shirkey; and/or she did not have a working relationship with Mike Shirkey; contrary to MCL 767A.9(1)(a). [767A.91A]

FELONY: 15 Years

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

The complaining witness asks that the defendant be apprehended and dealt with according to law.

Warrant authorized on <u>2/1/2024</u> by: _____ Date
<i>Danielle Hagaman-Clark</i> Danielle Hagaman-Clark (P63017) Assistant Attorney General Criminal Trials & Appeals Division 3030 W. Grand Blvd., Suite 10-300 Detroit, MI 48202 313-456-0180 <input type="checkbox"/> Security for costs posted

I declare under the penalties of perjury that this complaint has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

*Jennifer Kapushinski*  
Complaining Witness Signature  
  
02/21/2024  
Date