

<b>STATE OF MICHIGAN 54A JUDICIAL DISTRICT 30TH JUDICIAL CIRCUIT</b>	<b>COMPLAINT FELONY</b>	<b>DISTRICT: CIRCUIT: CTN: 96-24900039-01 AG#: 2022-0355062</b>
District Court ORI: MI330075J	Circuit Court ORI: MI330055J	AG ORI: MI820025A

<b>THE PEOPLE OF THE STATE OF MICHIGAN</b>		v Defendant's name and address <b>HEATHER LOMBARDINI</b> [REDACTED]	Victim or complainant <b>STATE OF MICHIGAN</b>
Co-defendant(s) (If known)			Complaining Witness <b>S/A JENNIFER KAPUSHINSKI</b>
			Date: On or about <b>06/01/2020-05/03/2021</b>
City/Twp./Village <b>City of Lansing</b>	County in Michigan <b>INGHAM</b>	Defendant TCN	Defendant CTN <b>96-24900039-01</b>
Defendant DOB <b>Put DOB in Ref. No. row 1 on MC 97</b>	Defendant DLN <b>Put DLN in Ref. No. row 3 on MC 97</b>	DLN Type:	Defendant Sex <b>F</b>
Police agency report no. <b>AG#: 2022-0355062</b>	Charge <b>See below</b>	Vehicle Type	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 range above and in Lansing, MI, the defendant, contrary to law,

**COUNT 1: CAMPAIGN FINANCE - FAILING TO FILE A STATEMENT OF ORGANIZATION**  
did fail to file a statement of organization for a committee, namely Michigan! My Michigan!, for more than 30 days after such a statement was required to be filed; contrary to MCL 169.224. [169.224]

MISDEMEANOR: \$1,000.00 fine

**COUNT 2: CAMPAIGN FINANCE - FAILING TO FILE A STATEMENT OF ORGANIZATION**  
did fail to file a statement of organization for a committee, namely Michigan Citizens for Fiscal Responsibility, for more than 30 days after such a statement was required to be filed; contrary to MCL 169.224. [169.224]

MISDEMEANOR: \$1,000.00 fine

**COUNT 3: CAMPAIGN FINANCE - BALLOT COMMITTEE - FAILURE TO FILE A CAMPAIGN STATEMENT**  
being the treasurer or other individual designated as responsible for the recordkeeping, report preparation, or report filing of Michigan! My Michigan!, a ballot question committee, did fail to file a campaign statement as required by MCL 169.234(1) for more than 7 days after the filing deadline; contrary to MCL 169.234. [169.234]

MISDEMEANOR: 90 Days and/or \$1,000.00

**COUNT 4: UTTERING AND PUBLISHING**  
did utter and publish as true, a certain false record, instrument, or other writing, with intent to injure or defraud, knowing said instrument to be false, said instrument more fully described as follows: a document titled as an affidavit, signed by Heather Lombardini on September 9, 2020, and submitted to the Michigan Department of State as a response to a complaint filed under MCL 169.215; contrary to MCL 750.249. [750.249]

FELONY: 14 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>02/01/2024</u> by: <u><i>Danielle Hagaman-Clark</i></u> Date
Danielle Hagaman-Clark (P63017) Assistant Attorney General Criminal Trials & Appeals Division Criminal Trials and Appeals Division 3030 W. Grand Blvd., Suite 10-200 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