

STATE OF MICHIGAN 54B JUDICIAL DISTRICT 30TH JUDICIAL CIRCUIT	<b>WARRANT FELONY</b>	DISTRICT: 23-0876 FY CIRCUIT: CTN: 96-23901307-01 MSP #: 2022-0338639-A
District Court ORI: MI330065J	Circuit Court ORI: MI330055J	AG ORI: MI820025A

Defendant's name and address <b>THE PEOPLE OF THE STATE OF MICHIGAN</b> v <b>ROBERT LOUIS MINARD</b> [REDACTED]		Victim or complainant <b>STATE OF MICHIGAN</b>
Co-defendant(s) (if known) Anne Minard		Complaining Witness <b>S/A ROBERT MENARD</b>
Date: On or about <b>06/12/2018-12/31/2021</b>		
City/Twp./Village <b>East Lansing</b>	County in Michigan <b>INGHAM</b>	Defendant TCN <b>96-23901307-01</b>
Defendant DOB [REDACTED]	Defendant DLN	Defendant SID
Police agency report no. <b>2022-0338639-A</b>	Charge <b>See below</b>	Defendant Sex <b>M</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**

To any peace officer or court officer authorized to make arrest: The complaining witness has filed a sworn complaint in this court stating that on the date and the location described above, the defendant, contrary to law,

**COUNT 1: CRIMINAL ENTERPRISES - CONDUCTING**

being a person employed by or associated with an enterprise, to wit: Victor Strategies and/or the Peninsula Fund and/or an organization, association, other legal entity, or a group of persons associated in fact, did knowingly conduct or participate in the affairs of the enterprise directly or indirectly through a pattern of racketeering activity, consisting of two or more of the following incidents of racketeering, to wit:

on or about June 15, 2018 through January 27, 2019, in the City of East Lansing, defendants ROBERT MINARD and ANNE MINARD did commit and/or aid or abet in the commission of the following offense for financial gain, to wit: did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00, contrary to MCL 750.218(4)(a);

and on or about September 7, 2018, in the City of East Lansing, defendant ROBERT MINARD did commit the following offense for financial gain, to-wit: did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00, contrary to MCL 750.218(4)(a);

and on or about June 12, 2019 through December 11, 2019, in the City of Lansing, defendant ANNE MINARD did commit the following offense for financial gain, to wit: being an agent of the Peninsula Fund, a non-profit corporation or charitable organization, did convert to her own use, money of the Peninsula Fund, having a value of more than \$1,000.00 but less than \$20,000, that came into the defendant's possession or under defendant's charge or control by virtue of her relationship with the principal; contrary to MCL 750.174(5)(c);

and on or about August 13, 2019 through October 23, 2019, in the City of Okemos, defendant ANNE MINARD did commit the following offense for financial gain, to-wit: did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00, contrary to MCL 750.218(4)(a);

and on or about September 24, 2019, in the City of Lansing, defendants ROBERT MINARD and ANNE MINARD did commit and/or aid or abet in the commission of the following offense for financial gain, to-wit: did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00, contrary to MCL 750.218(4)(a);

and on or about July 6, 2020 in the City of Lansing, defendant ANNE MINARD did commit the following offense for financial gain, to-wit: did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00, contrary to MCL 750.218(4)(a);

and on or about July 6, 2020 in the City of East Lansing, defendants ROBERT MINARD and ANNE MINARD did commit and/or aid or abet in the commission of the following offense for financial gain, to wit: did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00, contrary to MCL 750.218(4)(a);

and on or about October 1, 2019 through January 1, 2021 in the City of Lansing, defendant ANNE MINARD did commit the following offense for financial gain, to-wit: being an agent of the Peninsula Fund, a non-profit corporation or charitable organization, did convert to her own use, money of the Peninsula Fund, having a value of more than \$1,000.00 but less than \$20,000, that came into the defendant's possession or under defendant's charge or control by virtue of her relationship with the principal; contrary to MCL 750.174(5)(c);

and on or about September 23, 2020 through October 14, 2020, in the City of East Lansing, defendants ROBERT MINARD and ANNE MINARD did commit and/or aid or abet in the commission of the following offense for financial gain, to wit: did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$20,000 or more but less than \$50,000; contrary to MCL 750.218(5)(a);

and on or about October 22, 2020 through November 12, 2020, in the City of East Lansing, defendants ROBERT MINARD and ANNE MINARD did commit and/or aid or abet in the commission of the following offense for financial gain, to wit: being an agent of Working Together for a Better MI, did convert to his/her own use, money of Working Together for a Better Michigan, having a value of \$100,000 or more, that came into defendants' possession or under the defendants' control by virtue of his/her relationship with the principal; contrary to MCL 750.174(7);

Which had the same or a substantially similar purpose, or result, or participant, or victim, or method of commission, and which amount to or pose a threat of continued criminal activity; contrary to MCL 750.159i(1).

FELONY: 20 Years and/or \$100,000.00; criminal forfeiture of proceeds, substituted proceeds, and instrumentalities of racketeering listed on attached notification (see MCL 750.159j(4)); court may order court costs, costs of investigation, and/or costs of prosecution.

**COUNT 2: CRIMINAL ENTERPRISES - CONSPIRACY**

being persons employed by or associated with an enterprise, to wit: Victor Strategies and/or the Peninsula Fund, and/or an organization, association, other legal entity, or a group of persons associated in fact, did conspire together with one and another and/or other diverse persons unknown to knowingly conduct or participate in the affairs of the enterprise directly or indirectly through a pattern of racketeering activity, consisting of two or more of the following incidents of racketeering, to wit:

on or about June 15, 2018 through January 27, 2019, in the City of East Lansing, defendants ROBERT MINARD and ANNE MINARD did commit and/or aid or abet in the commission of the following offense for financial gain, to wit: did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00, contrary to MCL 750.218(4)(a);

and on or about September 7, 2018, in the City of East Lansing, defendant ROBERT MINARD did commit the following offense for financial gain, to-wit: did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00, contrary to MCL 750.218(4)(a);

and on or about June 12, 2019 through December 11, 2019, in the City of Lansing, defendant ANNE MINARD did commit the following offense for financial gain, to wit: being an agent of the Peninsula Fund, a non-profit corporation or charitable organization, did convert to her own use, money of the Peninsula Fund, having a value of more than \$1,000.00 but less than \$20,000, that came into the defendant's possession or under defendant's charge or control by virtue of her relationship with the principal; contrary to MCL 750.174(5)(c);

and on or about August 13, 2019 through October 23, 2019, in the City of Okemos, defendant ANNE MINARD did commit the following offense for financial gain, to-wit: did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00, contrary to MCL 750.218(4)(a);

and on or about September 24, 2019, in the City of Lansing, defendants ROBERT MINARD and ANNE MINARD did commit and/or aid or abet in the commission of the following offense for financial gain, to-wit: did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00, contrary to MCL 750.218(4)(a);

and on or about July 6, 2020 in the City of Lansing, defendant ANNE MINARD did commit the following offense for financial gain, to-wit: did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00, contrary to MCL 750.218(4)(a);

and on or about July 6, 2020 in the City of East Lansing, defendants ROBERT MINARD and ANNE MINARD did commit and/or aid or abet in the commission of the following offense for financial gain, to wit: did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00, contrary to MCL 750.218(4)(a);

and on or about October 1, 2019 through January 1, 2021 in the City of Lansing, defendant ANNE MINARD did commit the following offense for financial gain, to-wit: being an agent of the Peninsula Fund, a non-profit corporation or charitable organization, did convert to her own use, money of the Peninsula Fund, having a value of more than \$1,000.00 but less than \$20,000, that came into the defendant's possession or under defendant's charge or control by virtue of her relationship with the principal; contrary to MCL 750.174(5)(c);

and on or about September 23, 2020 through October 14, 2020, in the City of East Lansing, defendants ROBERT MINARD and ANNE MINARD did commit and/or aid or abet in the commission of the following offense for financial gain, to wit: did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$20,000 or more but less than \$50,000; contrary to MCL 750.218(5)(a);

and on or about October 22, 2020 through November 12, 2020, in the City of East Lansing, defendants ROBERT MINARD and ANNE MINARD did commit and/or aid or abet in the commission of the following offense for financial gain, to wit: being an agent of Working Together for a Better MI, did convert to his/her own use, money of Working Together for a Better Michigan, having a value of \$100,000 or more, that came into defendants' possession or under the defendants' control by virtue of his/her relationship with the principal; contrary to MCL 750.174(7);

Which had the same or a substantially similar purpose, or result, or participant, or victim, or method of commission, and which amount to or pose a threat of continued criminal activity; contrary to MCL 750.159i(1).

FELONY: 20 Years and/or \$100,000.00; criminal forfeiture of proceeds, substituted proceeds, and instrumentalities of racketeering listed on attached notification (see MCL 750.159j(4)); court may order court costs, costs of investigation, and/or costs of prosecution.

**COUNT 3: TAXES - FAILURE TO FILE/FALSE RETURN/PAYMENT**

did, with the intent to defraud or evade the payment of a tax, or part of a tax, make a false or fraudulent income tax return or payment as required by MCL 206.311; contrary to MCL 205.27(1)(a). [205.271A]

FELONY: 5 Years and/or \$5,000.00

**COUNT 4: FALSE PRETENSES - \$1,000.00 OR MORE BUT LESS THAN \$20,000.00**

on or about June 15, 2018 through January 27, 2019, in the City of East Lansing, defendants ROBERT MINARD and ANNE MINARD did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00, contrary to MCL 750.218(4)(a);

FELONY: 5 Years and/or \$10,000.00, or 3 times the value of the money or property involved, whichever is greater. To impose a fine of 3 times the value, the defendant must admit the amount, or it must be determined by the trier of fact at trial. See *Southern Union Co v United States 132 S Ct 2344 (2012)*.

**COUNT 5: FALSE PRETENSES - \$1,000.00 OR MORE BUT LESS THAN \$20,000.00**

on or about September 7, 2018, in the City of East Lansing, defendant ROBERT MINARD did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00, contrary to MCL 750.218(4)(a);

FELONY: 5 Years and/or \$10,000.00, or 3 times the value of the money or property involved, whichever is greater. To impose a fine of 3 times the value, the defendant must admit the amount, or it must be determined by the trier of fact at trial. See *Southern Union Co v United States 132 S Ct 2344 (2012)*.

**COUNT 6: FALSE PRETENSES - \$1,000.00 OR MORE BUT LESS THAN \$20,000.00**

on or about September 24, 2019, in the City of Lansing, defendants ROBERT MINARD and ANNE MINARD did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00, contrary to MCL 750.218(4)(a);

FELONY: 5 Years and/or \$10,000.00, or 3 times the value of the money or property involved, whichever is greater. To impose a fine of 3 times the value, the defendant must admit the amount, or it must be determined by the trier of fact at trial. See *Southern Union Co v United States 132 S Ct 2344 (2012)*.

**COUNT 7: FALSE PRETENSES - \$1,000.00 OR MORE BUT LESS THAN \$20,000.00**

on or about July 6, 2020, in the City of East Lansing, defendants ROBERT MINARD and ANNE MINARD did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00, contrary to MCL 750.218(4)(a);

FELONY: 5 Years and/or \$10,000.00, or 3 times the value of the money or property involved, whichever is greater. To impose a fine of 3 times the value, the defendant must admit the amount, or it must be determined by the trier of fact at trial. See *Southern Union Co v United States 132 S Ct 2344 (2012)*.

**COUNT 8: FALSE PRETENSES - \$20,000.00 OR MORE BUT LESS THAN \$50,000.00**

on or about September 23, 2020 through October 14, 2020, in the City of East Lansing, defendants ROBERT MINARD and ANNE MINARD did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$20,000 or more but less than \$50,000; contrary to MCL 750.218(5)(a);

FELONY: 15 Years and/or \$15,000.00, or 3 times the value of the money or property involved, whichever is greater. To impose a fine of 3 times the value, the defendant must admit the amount, or it must be determined by the trier of fact at trial. See *Southern Union Co v United States 132 S Ct 2344 (2012)*.

**COUNT 9: EMBEZZLEMENT - \$100,000.00 OR MORE**

on or about October 22, 2020 through November 12, 2020, in the City of East Lansing, defendants ROBERT MINARD and ANNE MINARD being an agent of Working Together for a Better MI, did convert to his/her own use, money of Working Together for a Better Michigan, having a value of \$100,000 or more, that came into defendants' possession or under the defendants' control by virtue of his/her relationship with the principal; contrary to MCL 750.174(7);

FELONY: 20 Years and/or a fine up to \$50,000.00, or 3 times the amount embezzled, whichever is greater. A consecutive sentence may be imposed for any other conviction if the embezzlement victim was a non-profit, a person 60 years of age or older, or a vulnerable adult. To impose a fine of 3 times the value, the defendant must admit the amount, or it must be determined by the trier of fact at trial. Southern Union Co. v United States 567 US \_\_; No 11-94 (2012).

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

**THE COURT FINDS** probable cause to believe defendant committed the offense(s) set forth and that the following circumstance(s) apply:

- the complaint is for an assaultive crime or an offense involving domestic violence, as defined in MCL 764.1a.
- there is a reason to believe from the complaint that the person against whom the complaint is made will not appear on a summons
- the issuance of a summons poses a risk to public safety.  the prosecutor has requested an arrest warrant.

**THEREFORE, IN THE NAME OF THE PEOPLE OF THE STATE OF MICHIGAN**, I order you to arrest and bring defendant before the **54B** District Court immediately.

The defendant may be released before arraignment if \$ \$15,000 / PR is posted as interim bail

by \_\_\_\_\_  
Date

DEC 21 2023  
Date

(SEAL)

Molly Hennessey Greenlee  
Judge/Magistrate  
Bar no. P13583

**See return on next page.**  
MC 200w (9/22) FELONY SET, Warrant (PACC-PAAM Replacement)

MCL 764.1 et seq., MCL 766.1 et seq., MCL 767.1 et seq., MCR 6.102

**RETURN**

As ordered in this warrant, the defendant was arrested on \_\_\_\_\_ at \_\_\_\_\_  
Date Time

at \_\_\_\_\_  
Place of arrest

\_\_\_\_\_  
Date

\_\_\_\_\_  
Peace officer

**PROSECUTION TO BE HANDLED BY:**

Gage Wakula (P83866)  
Assistant Attorney General  
Criminal Trials & Appeals Division  
3030 W. Grand Blvd.  
Detroit, MI 48202  
[REDACTED]