

20060911

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT	<b>COMPLAINT FELONY</b>	DISTRICT: CIRCUIT: CTN: 96-20900959-01 MSP #:
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District Court ORI: MI820365J      Circuit Court ORI: MI821095J      AG ORI: MI820025A

THE PEOPLE OF THE STATE OF MICHIGAN		Victim or complainant
v		[REDACTED]
JOHN MACAULEY BURKMAN		Complaining Witness
[REDACTED]		S/A JEFF CAMPBELL
ARLINGTON, VA 22209		Date: On or about
Co-defendant(s) Jacob Alexander Wohl		08/26/2020
City/Twp./Village	County in Michigan	Defendant SID
DETROIT	Wayne	[REDACTED]
Charge(s)	Maximum Penalty	
See Below	See Below	

STATE OF MICHIGAN, COUNTY OF WAYNE  
The complaining witness says that on the date and in the Detroit, Wayne County, the defendant, contrary to law,

**COUNT 1: ELECTION LAW - BRIBING/INTIMIDATING VOTERS**  
did attempt by means of menace and/or the corrupt means of presenting false and misleading statements about mail-in voting in a telephone message, either directly or indirectly, to deter [REDACTED] and/or other Detroit area electors, in giving his or her vote at any election held in this state; contrary to MCL 168.932(a). [168.932A]

FELONY: 5 Years and/or \$1,000.00 (see MCL 168.935)

**COUNT 2: CONSPIRACY TO COMMIT ELECTION LAW - BRIBING/INTIMIDATING VOTERS**  
did unlawfully conspire, combine, confederate and agree together with Jacob Alexander Wohl and/or other unknown person to commit the following listed offense; contrary to MCL 750.157a: ELECTION LAW - BRIBING/INTIMIDATING VOTERS, prohibited by MCL 168.932(a). [168.932A][C]

FELONY: The same 5 year and/or \$1,000 fine for Election Law-Bribing/ Intimidating Voter, plus a \$10,000 additional fine.

**COUNT 3: COMPUTERS - USING TO COMMIT A CRIME - MAXIMUM IMPRISONMENT OF 4 YEARS OR MORE BUT LESS THAN 10 YEARS**  
did use a computer program, computer, computer system, or computer network to commit, attempt to commit, conspire to commit, or solicit another to commit Election Law-Bribing/Intimidating Voters, in violation of MCL 168.932(a); contrary to MCL 752.796, and MCL 752.797(3)(d). [752.7973D]

FELONY: 7 Years and/or \$5,000.00; reimburse government for expenses incurred in relation to violation in manner indicated by MCL 769.1f (see MCL 752.797(7)). A consecutive sentence may be imposed for the underlying conviction.

**COUNT 4: COMPUTERS - USING TO COMMIT A CRIME - MAXIMUM IMPRISONMENT OF 4 YEARS OR MORE BUT LESS THAN 10 YEARS**  
did use a computer program, computer, computer system, or computer network to commit, attempt to commit, conspire to commit, or solicit another to commit Conspiracy to Commit Election Law-Bribing/Intimidating Voters, in violation of MCL 750.157a and MCL 168.932(a); contrary to MCL 752.796, and MCL 752.797(3)(d). [752.7973D]

FELONY: 7 Years and/or \$5,000.00; reimburse government for expenses incurred in relation to violation in

manner indicated by MCL 769.1f (see MCL 752.797(7)). A consecutive sentence may be imposed for the underlying conviction.

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 defendant be apprehended and dealt with according to law.

Warrant authorized on <u>10-1-2020</u>	Date
by: 	
Richard Cunningham (P29735) Assistant Attorney General Criminal Trials & Appeals Division 3030 W. Grand Blvd. Ste. 10-200 Detroit, MI 48202 313-456-0204	
<input type="checkbox"/> Security for costs posted	

<u>Jeffrey D. Campbell</u>	10/1/2020
Complaining witness signature	
Subscribed and sworn to before me on <u>10/1/2020 12:48 pm.</u>	
<u>Malaika Ramsey-Heath P63114</u>	
Judge/Magistrate/Clerk	Bar no.

PC Hearing conducted at 11:55 a.m.

20060910

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT	<b>COMPLAINT FELONY</b>	DISTRICT: CIRCUIT: CTN: 96-20900961-01 MSP #:
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District Court ORI: MI820365J

Circuit Court ORI: MI821095J

AG ORI: MI820025A

<b>THE PEOPLE OF THE STATE OF MICHIGAN</b> v		Victim or complainant: [REDACTED]
<b>JACOB ALEXANDER WOHL</b> [REDACTED] <b>LOS ANGELES, CA 90046</b>		Complaining Witness S/A JEFF CAMPBELL
Co-defendant(s) John Macauley Burkman		Date: On or about 08/26/2020
City/Twp./Village DETROIT	County in Michigan Wayne	Defendant SiD [REDACTED]
Charge(s) See Below		Maximum Penalty See Below

20050910

**STATE OF MICHIGAN, COUNTY OF WAYNE**

The complaining witness says that on the date and in Detroit, Wayne County, the defendant, contrary to law,

**COUNT 1: ELECTION LAW - BRIBING/INTIMIDATING VOTERS**

did attempt by means of menace and/or the corrupt means of presenting false and misleading statements about mail-in voting in a telephone message, either directly or indirectly, to deter [REDACTED] and/or other Detroit area electors, in giving his or her vote at any election held in this state; contrary to MCL 168.932(a). [168.932A]

FELONY: 5 Years and/or \$1,000.00 (see MCL 168.935)

**COUNT 2: CONSPIRACY TO COMMIT ELECTION LAW - BRIBING/INTIMIDATING VOTERS**

did unlawfully conspire, combine, confederate and agree together with John Macauley Burkman and/or other unknown person to commit the following listed offense; contrary to MCL 750.157a: ELECTION LAW - BRIBING/INTIMIDATING VOTERS, prohibited by MCL 168.932(a). [168.932A][C]

FELONY: The same 5 year and/or \$1,000 fine for Election Law- Bribing/Intimidating Voter, plus a \$10,000 additional fine.

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Warrant authorized on <u>10-1-2020</u>	<u>Jeffrey D. Campbell</u> 10/1/2020
by: <u>[Signature]</u>	Complaining witness signature
Richard Cunningham (P29735) Assistant Attorney General Criminal Trials & Appeals Division 3030 W. Grand Blvd. Ste. 10-200 Detroit, MI 48202 313-456-0204	Subscribed and sworn to before me on <u>10/1/2020 12:50 pm</u> heard at <u>12:04</u>  <u>Malaika Ramsey-Heath P68114</u> Judge/Magistrate/Clerk Bar no.
<input type="checkbox"/> Security for costs posted	