

<b>STATE OF MICHIGAN DISTRICT COURT</b>	<b>AFFIDAVIT IN SUPPORT OF COMPLAINT</b>	<b>CASE NO. 2022-0343234-A DISTRICT CT. NO. CIRCUIT CT. NO.</b>
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**THE COMPLAINING WITNESS, ON INFORMATION AND BELIEF, SAYS:**

1. I, Affiant, Howard Shock, am a Special Agent Investigator with the Michigan Department of Attorney General. I have 26 years' experience in law enforcement and criminal investigations. My job duties include the investigation of criminal activity as assigned by the Department.
2. In the regular course of my duties I, along with several other investigators, am involved with the Department of Attorney General's investigation into the 2020 false certificate of votes by Republican candidates for electors submitted to the United States National Archives and President of the United States Senate in support of losing candidates, President Donald J. Trump and Vice President Mike Pence in the 2020 election. I submit this affidavit in support of my request for criminal charges.
3. On December 28, 2022, affiant was assigned as the primary investigator of Department of Attorney General Case 2022-0343234-A. The affiant was assigned to investigate a possible violation of state felony criminal statutes relating to the forgery of a "Certificate of Votes concerning the electors for President and Vice-President of the United States," in violation of MCL 750.248 and MCL 168.933a, which occurred on or about December 14, 2020.
4. MCL 750.248 provides, in relevant part, that any person who falsely makes, alters, forges, or counterfeits a public record with the intent to defraud is guilty of the crime of forgery. A fraudulent "Certificate of Votes," done with the intent to defraud, is probable cause that a violation of this statute has occurred.
5. MCL 168.933a provides that any person who knowingly makes, files, or otherwise publishes a false document for any purpose under the Michigan Election Law, with the intent to defraud, is guilty of election law forgery. The making and publishing of a Certificate of Votes concerning the number of votes cast for each candidate for president and vice-president by the electors is a purpose under the Election Law. Thus, a fraudulent "Certificate of Votes", done with the intent to defraud, is probable cause that a violation of this statute has occurred.
6. MCL 750.249 provides that any person who utters and publishes as true a false, forged, altered, or counterfeit record, instrument, or other writing listed in section 248 knowing it to be false, altered, forged, or counterfeit with intent to injure or defraud is guilty of a felony punishable by imprisonment for not more than 14

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**People of the State of Michigan v Kathleen Berden, Mayra Rodriguez, Meshawn Maddock, John Haggard, Kent Vanderwood, Marian Sheridan, James Renner, Amy Facchinello, Rose Rook, William Choate, Mari-Ann Henry, Clifford Frost Jr., Stanley Grot, Timothy King, Michele Lundgren, Kenneth Thompson**

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<b>STATE OF MICHIGAN DISTRICT COURT</b>	<b>AFFIDAVIT IN SUPPORT OF COMPLAINT</b>	<b>CASE NO. 2022-0343234-A DISTRICT CT. NO. CIRCUIT CT. NO.</b>
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years. The uttering and publishing of a fraudulent “Certificate of Votes,” done with the intent to defraud, is probable cause that a violation of this statute has occurred.

7. MCL 750.157a provides that any person who conspires together with 1 or more persons to commit an offense prohibited by law, or to commit a legal act in an illegal manner, is guilty of the crime of conspiracy. An agreement to gather and sign a fraudulent “Certificate of Votes,” in violation of the statutes listed in paragraphs 4, 5, and 6, is probable cause that a conspiracy to commit the underlying crime existed.
8. The investigation disclosed that a Certificate of Votes of the electors is a public document required by law to be filed with the National Archives and President of the U.S. Senate. Over the course of the investigation, it was discovered that a fraudulent “Certificate of Votes of the 2020 Electors from Michigan” was created; that none of the sixteen signatories to this document were lawfully selected electors for the offices of President and Vice-President; and that the document was made and published with the intent to defraud the National Archives, President of the U.S. Senate, and others.
9. The Constitution of the United States provides in Article II, Section 1 for the procedures by which each State shall select Electors who will elect the persons to serve as the President and Vice President. This constitutional provision provides, in pertinent part:

The Executive Power shall be vested in a President of the United States of America. He shall hold his Office during the Term of four Years, and, together with the Vice President, chosen for the same Term, be elected, as follows:

Each State shall appoint, in such Manner as the Legislature thereof may direct, a Number of Electors, equal to the whole Number of Senators and Representatives to which the State may be entitled in the Congress: but no Senator or Representative, or Person holding an Office of Trust or Profit under the United States, shall be appointed an Elector.

The Electors shall meet in their respective States, and vote by Ballot for two Persons, of whom one at least shall not be an Inhabitant of the same State with themselves. And they shall make a List of all the Persons voted

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**People of the State of Michigan v Kathleen Berden, Mayra Rodriguez, Meshawn Maddock, John Haggard, Kent Vanderwood, Marian Sheridan, James Renner, Amy Facchinello, Rose Rook, William Choate, Mari-Ann Henry, Clifford Frost Jr., Stanley Grot, Timothy King, Michele Lundgren, Kenneth Thompson**

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for, and of the Number of Votes for each; which List they shall sign and certify and transmit sealed to the Seat of the Government of the United States, directed to the President of the Senate.

The Electors shall meet in their respective States, and vote by Ballot for the office of president and vice-president of the United States. Electors shall then make a list of the persons voted for and the number of votes for each, which they must sign and certify. Two Persons, of whom one at least shall not be an Inhabitant of the same State with themselves, and they shall make a List of all the Persons voted for, and of the Number of Votes for each; which List they shall sign and certify and transmit sealed to the Seat of the Government of the United States, directed to the President of the Senate.

10. The procedure by which Michigan selects Presidential electors is set out in Chapter IV of the Michigan Election Law (MCL 168.41 – MCL 168.47). MCL 168.42 provides, in relevant part, that:

each political party in this state shall choose at its fall state convention a number of candidates for electors of president and vice-president of the United States equal to the number of senators and representatives in congress that this state is entitled to elect. The chairperson and the secretary of the state central committee of each political party shall, within 1 business day after the conclusion of the state convention, forward by registered or certified mail a certificate containing the names of the candidates for electors to the secretary of state. The candidates for electors of president and vice-president who shall be considered elected are those whose names have been certified to the secretary of state by that political party receiving the greatest number of votes for those offices at the next November election.

11. In anticipation of the 2020 General Election, the two major political parties in Michigan met in their respective conventions and selected the persons who would serve as candidates for electors of President and Vice-President of the United States. As required by MCL 168.42, each of those parties forwarded the names of that party's 16 candidates for elector to the Michigan Secretary of State. The persons identified to the Secretary of State as the Republican Party candidates for elector were (1) Kathleen Berden, (2) Mayra Rodriguez, (3) Meshawn Maddock, (4) John Haggard, (5) Kent Vanderwood, (6) Marian Sheridan, (7) Terri Lynn

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**People of the State of Michigan v Kathleen Berden, Mayra Rodriguez, Meshawn Maddock, John Haggard, Kent Vanderwood, Marian Sheridan, James Renner, Amy Facchinello, Rose Rook, William Choate, Mari-Ann Henry, Clifford Frost Jr., Stanley Grot, Timothy King, Michele Lundgren, Kenneth Thompson**

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<b>STATE OF MICHIGAN DISTRICT COURT</b>	<b>AFFIDAVIT IN SUPPORT OF COMPLAINT</b>	<b>CASE NO. 2022-0343234-A DISTRICT CT. NO. CIRCUIT CT. NO.</b>
---	--	---

Land, (8) Amy Facchinello, (9) Rose Rook, (10) William Henry Choate, (11) Mari-Ann Henry, (12) Clifford Frost, Jr., (13) Stanley Grot, (14) Timothy King, (15) Michele Lundgren and (16) Gerald Wall. Michigan Secretary of State representative, Adam Fracassi provided a copy of this document.

12. MCL 168.46 is a provision of the Michigan Election Law concerning the certification of Presidential electors. The provision provides:

As soon as practicable after the state board of canvassers has, by the official canvass, ascertained the result of an election as to electors of president and vice-president of the United States, the governor shall certify, under the seal of the state, to the United States secretary of state, the names and addresses of the electors of this state chosen as electors of president and vice-president of the United States. The governor shall also transmit to each elector chosen as an elector for president and vice-president of the United States a certificate, in triplicate, under the seal of the state, of his or her election.

13. The 2020 General Election was held on November 3, 2020. On November 23, 2020, the Michigan Board of State Canvassers met and certified the election results. The Board certified that Democratic Party nominees Joseph Biden and Kamala Harris had respectively received the greatest number of votes for President and Vice-President. That same day, pursuant to MCL 168.46, Michigan Governor Gretchen Whitmer signed and issued an “Amended Certificate of Ascertainment of the Electors of the President and Vice President of the United States,” which determined that the Democratic electors in the Presidential election won approximately 2.8 million votes, while the Republican party won about 2.65 million votes during the Presidential election. Specifically, the certificate stated that the “persons nominated by the Democratic Party, each having received 2,804,040 votes, were duly elected as Electors.” Each of the Democratic Party Electors listed as “duly elected” was sent a certificate, under seal, attesting to his or her election.

14. Governor Whitmer’s “Amended Certificate of Ascertainment of the Electors of the President and Vice President of the United States,” which determined that the Democratic electors were the duly elected electors, listed the Republican nominees as having received 2,649,852 votes. The Republican nominees were not the duly elected Presidential electors and had no legal authority to act as duly elected Presidential electors.

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**People of the State of Michigan v Kathleen Berden, Mayra Rodriguez, Meshawn Maddock, John Haggard, Kent Vanderwood, Marian Sheridan, James Renner, Amy Facchinello, Rose Rook, William Choate, Mari-Ann Henry, Clifford Frost Jr., Stanley Grot, Timothy King, Michele Lundgren, Kenneth Thompson**

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<b>STATE OF MICHIGAN DISTRICT COURT</b>	<b>AFFIDAVIT IN SUPPORT OF COMPLAINT</b>	<b>CASE NO. 2022-0343234-A DISTRICT CT. NO. CIRCUIT CT. NO.</b>
---	--	---

15. MCL 168.47 is a provision of the Michigan Election Law concerning the convening of presidential electors. The provision provides:

The electors of president and vice-president shall convene in the senate chamber at the capitol of the state at 2 p.m., eastern standard time, on the first Monday after the second Wednesday in December following their election. At any time before receipt of the certificate of the governor or within 48 hours thereafter, an elector may resign by submitting his written and verified resignation to the governor. Failure to so resign signifies consent to serve and to cast his vote for the candidates for president and vice-president appearing on the Michigan ballot of the political party which nominated him. Refusal or failure to vote for the candidates for president and vice-president appearing on the Michigan ballot of the political party which nominated the elector constitutes a resignation from the office of elector, his vote shall not be recorded, and the remaining electors shall forthwith fill the vacancy. The ballot used by the elector shall bear the name of the elector. If at the time of convening there is any vacancy caused by death, resignation, refusal, or failure to vote, neglect to attend, or ineligibility of any person elected, or for any other cause, the qualified electors of president and vice-president shall proceed to fill such vacancy by ballot, by a plurality of votes. When all the electors appear and the vacancy shall be filled, they shall proceed to perform the duties of such electors, as required by the constitution and laws of the United States. If congress hereafter fixes a different day for such meeting, the electors shall meet and give their votes on the day designated by act of congress.

16. On December 14, 2020, pursuant to federal and state law, the lawfully designated Electors met at the Capitol in Lansing, Michigan and cast their votes for the Democratic Party nominees for President and Vice-President. Pursuant to federal law, certificates of votes were transmitted to the President of the Senate, the Archivist of the United States, the Secretary of the State of Michigan and the Chief Judge of the US District Court for the Western District of Michigan. See, Title 3 US Code Sec. 11; MCL 168.47

17. Notwithstanding the certification by the Michigan Board of State Canvassers that the Democratic Party nominees had received the greatest number of votes for president and vice-president, a group of persons identifying themselves as the “Republican Party Electors” appeared at the grounds of the Michigan Capitol on

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**People of the State of Michigan v Kathleen Berden, Mayra Rodriguez, Meshawn Maddock, John Haggard, Kent Vanderwood, Marian Sheridan, James Renner, Amy Facchinello, Rose Rook, William Choate, Mari-Ann Henry, Clifford Frost Jr., Stanley Grot, Timothy King, Michele Lundgren, Kenneth Thompson**

**Affidavit in Support of Complaint**

<b>STATE OF MICHIGAN DISTRICT COURT</b>	<b>AFFIDAVIT IN SUPPORT OF COMPLAINT</b>	<b>CASE NO. 2022-0343234-A DISTRICT CT. NO. CIRCUIT CT. NO.</b>
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December 14, 2020, and asserted the right to cast ballots as electors of the president and vice-president. They were turned away by Michigan State Police and were not admitted to the Capitol building.

18. On December 14, 2020, 14 of the 16 the Republican Party candidates for elector met at the Michigan Republican Party Headquarters located at 520 Seymour Ave., Lansing 48933, and executed a document entitled, "Certificate of The Votes Of The 2020 Electors From Michigan." Among those signing the document were 14 of the elector candidates who had been selected at the Republican party convention. Candidates Terri Lynn Land and Gerald Wall did not attend the meeting. Kenneth Thompson was selected to replace Terri Lynn Land, and James Renner was selected to replace Gerald Wall. Both Thompson and Renner signed the document. Neither Land nor Wall signed the document.
19. Notwithstanding the fact that the Democratic Party nominees had been certified by the Michigan Board of State Canvassers as having received the greatest number of votes for President and Vice-President, the 16 persons who signed the "Certificate of The Votes of the 2020 Electors from Michigan" falsely asserted that they were the duly elected and qualified Electors for president and vice president from the State of Michigan. They falsely asserted they met in the State Capital on December 14, 2020, at 2:00PM. The documents identified as "Certificates of Filling Vacancy of the 2020 Electors from Michigan" were signed by Kathleen Berden, the purported Chairperson, and Mayra Rodriguez, the purported Secretary. The document has two signature pages, each signed by all 16 persons.
20. Also on December 14, 2020, Republican Candidate for Elector, Michele Lundgren, Meshawn Maddock, Marian Sheridan, Kenneth Thompson, State Representative Daire Rendon, and others appeared at the State Capitol building. The group was denied entry by the Michigan State Police, F/Lt. Darren Green. Representative Rendon said the "electors" were there to cast their votes. An individual who identified himself as an attorney, Ian Northon, presented a manila envelope that was of the size appropriate to the "2020 Certificate of Votes" and attempted to deliver the envelope to the Michigan Senate. Northon cited MCL 168.47 as requiring the electoral votes to be delivered to the senate chamber at 2:00PM. Northon further claimed to have the Republican electoral votes in the envelope. This incident was captured on video, uploaded to YouTube, and preserved by the Michigan Department of Attorney General.

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**People of the State of Michigan v Kathleen Berden, Mayra Rodriguez, Meshawn Maddock, John Haggard, Kent Vanderwood, Marian Sheridan, James Renner, Amy Facchinello, Rose Rook, William Choate, Mari-Ann Henry, Clifford Frost Jr., Stanley Grot, Timothy King, Michele Lundgren, Kenneth Thompson**

**Affidavit in Support of Complaint**

STATE OF MICHIGAN DISTRICT COURT	AFFIDAVIT IN SUPPORT OF COMPLAINT	CASE NO. 2022-0343234-A DISTRICT CT. NO. CIRCUIT CT. NO.
-------------------------------------	---	--

21. On January 5th, 2021, the National Archives and Records Administration received by registered mail (tracking RE 041 878 637 US) the original copy of the “Certificate of The Votes of The 2020 Electors From Michigan.” The document received by this federal agency was of the size appropriate for the manila envelope that the group’s representative, Ian Northon, was trying to deliver at the Michigan Capitol. It had the return address of “Kathleen Berden, Chair of the Michigan Republican Electoral College.” The Director of Legal Affairs and Policy for the National Archives, Katerina Horska, sent a copy of the document and the envelope to the Michigan Department of Attorney General.
22. Inside the envelope received by the National Archivist of the United States on January 5, 2021, was a document entitled, “Certificate Of The Votes Of The 2020 Electors From Michigan.” The document indicates that it is regarding “Michigan’s Electoral Votes for President and Vice President,” and it is signed by 16 Republicans who falsely claim they were the “duly elected and qualified Electors for President and Vice President of the United States of America from the State of Michigan.” The signers also “certify” that “we convened and organized in the State Capitol, in the City of Lansing, Michigan, and at 2:00 p.m. Eastern Standard Time on the 14th day of December 2020, performed the duties enjoined upon us,” and that “we proceeded to vote by ballot, and balloted first for President and then for Vice President, by distinct ballots,” with 16 votes for both “DONALD J. TRUMP” and “MICHAEL R. PENCE.” They also certify “[t]hat the following are two distinct lists, one, of all the votes for President; and the other, of all the votes for Vice President, so cast as aforesaid.”
23. Also, inside the envelope were two “Certificate of Filling Vacancy of the 2020 Electors from Michigan.” These documents stated: “By a nomination duly made and seconded,” Ken Thompson (for Terri Lynn Land) and James Renner (for Gerald Wall) were “elected by the Electors present, as an Elector of President and Vice President of the United States of America for the State of Michigan to fill the vacancy in the manner provided by law.” The “Certificate of Filling Vacancy” also states, “This Elector participated in the proceedings as set forth in the record of the Electoral College.” This certificate is signed by Kathleen Berden and Mayra Rodriguez. The document is addressed to the President of the Senate, Archivist of the United States, Secretary of State, and the Chief Judge of the U.S. District Court in the Western District of Michigan. Notably, the document includes addresses for the above offices and indicates that “two duplicate originals” were enclosed. It also indicates that the documents were sent “By Registered Mail” to the “President of the Senate” and the Archivist of the United States, and “By

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**People of the State of Michigan v Kathleen Berden, Mayra Rodriguez, Meshawn Maddock, John Haggard, Kent Vanderwood, Marian Sheridan, James Renner, Amy Facchinello, Rose Rook, William Choate, Mari-Ann Henry, Clifford Frost Jr., Stanley Grot, Timothy King, Michele Lundgren, Kenneth Thompson**

**Affidavit in Support of Complaint**

<b>STATE OF MICHIGAN DISTRICT COURT</b>	<b>AFFIDAVIT IN SUPPORT OF COMPLAINT</b>	<b>CASE NO. 2022-0343234-A DISTRICT CT. NO. CIRCUIT CT. NO.</b>
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Certified Mail” to the “Secretary of State” and the Chief Judge, U.S. District Court for the Western District of Michigan.

24. On May 16th, 2023, Michigan Attorney General Special Agent Gentry Shelby viewed a second document at the United States Senate Archives. The document was received by priority registered mail (tracking RE 041 878 623 US). The document appeared to be the same as the document received by the National Archives. The document received by this federal department was of the size appropriate for the manila envelope that the group’s representative was trying to deliver to the Michigan Capitol on December 14, 2020. It had the return address of “Kathleen Berden, Chair of the Michigan Republican Electoral College.” The document also indicates on its face that it was sent by registered mail to the President of the United States Senate and the Archivist of the United States, and by certified mail to the Michigan Secretary of State and the Chief Judge of the US District Court for the Western District of Michigan. It was signed by 16 people who identified themselves as “the duly elected and qualified Electors for President and Vice President of the United States of America from Michigan.” The document also states the electors convened and organized in the State Capitol, in the City of Lansing, Michigan at 2:00PM on the 14th day of December.
25. Special Agent Edwardo Torres, in conjunction with US Postal Inspector James Van de Putte, confirmed that two envelopes were mailed from the East Lansing, Michigan Post Office on December 15, 2020. Kathleen Berden’s name, address, and title is printed on the envelope next to the word “From.”
26. On November 29, 2020, Republican candidate for electors: Timothy King, Marian Sheridan, and John Haggard filed a complaint in US District Court for the Eastern District of Michigan alleging voter fraud. These plaintiffs filed a motion for “Emergency Motion for Declaratory, Emergency, and Permanent Injunctive Relief,” which sought decertification of the results of the election and a “permanent injunction prohibiting the Governor and Secretary of State from transmitting the currently certified results to the Electoral College based on the overwhelming evidence of election tampering.” Plaintiffs also asked the Court to require “Governor Whitmer to transmit certified election results that state that President Donald Trump is the winner of the election.” The Court denied plaintiff’s motion on December 7, 2020. In her opinion and order, Eastern District Judge Linda Parker stated, “Plaintiffs ask this Court to ignore the orderly statutory scheme established to challenge elections and to ignore the will of

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**People of the State of Michigan v Kathleen Berden, Mayra Rodriguez, Meshawn Maddock, John Haggard, Kent Vanderwood, Marian Sheridan, James Renner, Amy Facchinello, Rose Rook, William Choate, Mari-Ann Henry, Clifford Frost Jr., Stanley Grot, Timothy King, Michele Lundgren, Kenneth Thompson**

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<b>STATE OF MICHIGAN DISTRICT COURT</b>	<b>AFFIDAVIT IN SUPPORT OF COMPLAINT</b>	<b>CASE NO. 2022-0343234-A DISTRICT CT. NO. CIRCUIT CT. NO.</b>
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millions of voters. This, the Court cannot, and will not, do. The People have spoken.”

27. The affiant knows that the Michigan Republican Party shared this information between leadership and committees. The affiant has gathered evidence to suggest the candidate for electors were also following media coverage of the events. Prior to December 14, 2020, Senate Majority Leader Mike Shirkey and Speaker of the House Lee Chatfield announced there was no evidence of voter fraud sufficient to affect the results of the election, and that the House and Senate would not be taking action to contest the electoral vote. The candidates for elector and the MIGOP leadership knew prior to their meeting on December 14, 2020, there was no legal reason to create an alternate slate of electors.
  
28. The affiant interviewed several MIGOP employees who confirmed that MIGOP Chairperson Laura Cox and the Republican National Committee organized a meeting of the 16 Republican electors on December 14, 2020, at the Republican headquarters building in Lansing. The affiant interviewed MIGOP staffers Tony Zammit and Troy Hudson, who were present on December 14, 2020. They stood at the entrance, allowing only the “Republican candidates for electors” inside. A film crew with attorney Ian Northon was outside in the parking lot but denied entry. Spouses, including Meshawn Maddock’s husband Representative Matt Maddock, were not permitted to enter. False electors were told no recording equipment was permitted inside. They asked the candidates to surrender their cell phones to prevent recording of the incident. The cell phones went into a box away from the false electors. GOP staff directed the false electors into the basement. Mr. Zammit and Mr. Hudson specifically recall seeing Kathleen Berden, Mayra Rodriguez, Meshawn Maddock, Marian Sheridan, and Kenneth Thompson, in the headquarters on December 14, 2020.
  
29. The affiant interviewed MIGOP employee, Henrietta Tow, who saw John Haggard at the headquarters building on December 14, 2020. The affiant interviewed MIGOP employee, Stuart Foster, who admitted calling some of the Republican candidates for elector to invite them to the headquarters on December 14, 2020. Mr. Foster spoke to Kathleen Berden, Kent Vanderwood, Mayra Rodriguez, Mari-Ann Henry, and Hank Choate after December 14, 2020, and they admitted to having been involved.
  
30. Michigan State Police Forensic Scientist McKenzie Weyh confirmed the signatures of: (1) Kathleen Berden, (2) William Choate, (3) Kent Vanderwood, (4) Clifford Frost, (5) Mari-Ann Henry, (6) Rose Rook, (7) Timothy King, and (8)

**People of the State of Michigan v Kathleen Berden, Mayra Rodriguez, Meshawn Maddock, John Haggard, Kent Vanderwood, Marian Sheridan, James Renner, Amy Facchinello, Rose Rook, William Choate, Mari-Ann Henry, Clifford Frost Jr., Stanley Grot, Timothy King, Michele Lundgren, Kenneth Thompson**

James Renner on the Certificate of the Votes of the 2020 Electors from Michigan as a match to their known signatures.

31. The affiant interviewed Michele Lundgren. Ms. Lundgren confirmed signing the “Certificate of the Votes of the 2020 Electors” from Michigan on December 14, 2020, at the Republican headquarters building. Mrs. Lundgren also confirmed she signed the document with Amy Facchinello. On March 5, 2023, the affiant served a search warrant upon Thumb Cellular to obtain call detail records from Kathleen Berden’s cellular phone for the period November 1, 2020, through January 8, 2021. Thumb Cellular was able to produce text message content and provided data that indicates text messages were sent and received during this period. Thumb Cellular produced the following text message sent on December 14, 2020, from Kathleen Berden’s cell number to Republican Candidate for Elector, John Haggard’s cell number: “I see Meshawn posted on facebook even though we were all asked to keep silent as to not draw attention to what the other states were doing similar to ours!” Haggard responded, “I am not a big fan in facebook or have a computer at home. Was she not told at the meeting to keep quite [sic].” Berden said, “Yes we all were,” and Haggard added, “Right. If she can’t keep quite [sic] after taking the oath what would she do as vice chair?”
32. On or about December 15, 2020, Meshawn Maddock and Marian Sheridan appeared on the Right-Side Broadcasting News program. Both admitted convening at the Republican building in Lansing on December 14, 2020. Both admitted casting their vote for President Trump with the 14 other “electors.” They carried their electoral ballot to the Michigan Capitol building in an effort to deliver it to the Senate Chambers but were denied entry. Marian Sheridan said copies of this document were sent to the proper locations and people.
33. On or about December 15, 2020, Meshawn Maddock and Marian Sheridan were interviewed about their involvement on December 14, 2020. Maddock admitted that the 16 Republican candidates for elector gathered, “held our caucus,” and “certified their ballots for Donald Trump and Mike Pence.” She also admitted that they went to the state Capitol, introduced themselves as “electors,” but were denied entrance. Sheridan said they were blocked from the Michigan Capitol.
34. Detroit News reporter M.L. Elrick published an article on October 9, 2022. Mr. Elrick confirmed he interviewed Stanley Grot, who admitted signing the document pledging support for President Trump. Daily News reporter Elisabeth Waldon published an article on August 9, 2022. Ms. Waldon confirmed she interviewed Kenneth Thompson, who admitted signing the document.

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**People of the State of Michigan v Kathleen Berden, Mayra Rodriguez, Meshawn Maddock, John Haggard, Kent Vanderwood, Marian Sheridan, James Renner, Amy Facchinello, Rose Rook, William Choate, Mari-Ann Henry, Clifford Frost Jr., Stanley Grot, Timothy King, Michele Lundgren, Kenneth Thompson**

<b>STATE OF MICHIGAN DISTRICT COURT</b>	<b>AFFIDAVIT IN SUPPORT OF COMPLAINT</b>	<b>CASE NO. 2022-0343234-A DISTRICT CT. NO. CIRCUIT CT. NO.</b>
---	--	---

35. On February 22, 2022, Mayra Rodriguez was interviewed by the January 6th Select Committee pursuant to an investigative subpoena about this document. She testified that Republican Candidates for electors met in the basement of the republican headquarters. Trump campaign aide, Shawn Flynn, spoke to the “Republican candidate for electors” at the Republican Headquarters in Lansing about an “alternate slate of electors.”

36. None of the 16 people who signed the document entitled “Certificate Of The Votes Of The 2020 Electors From Michigan” and was sent certified mail to the National Archives and Records Administration and the United States Senate Archives were legally elected or qualified as the 2020 Michigan Electors for President and Vice-President. The persons who signed the above document have been identified as: (1) Kathleen Berden, (2) Mayra Rodriguez, (3) Meshawn Maddock, (4) John Haggard, (5) Kent Vanderwood, (6) Marian Sheridan, (7) James Renner, (8) Amy Facchinello, (9) Rose Rook, (10) Hank Choate, (11) Mari-Ann Henry, (12) Clifford Frost, (13) Stanley Grot, (14) Timothy King, (15) Michele Lundgren, and (16) Kenneth Thompson.<sup>37</sup>

37. Based on the information contained in Paragraphs 1-31, I am seeking a warrant charging (1) Kathleen Berden, (2) Mayra Rodriguez, (3) Meshawn Maddock, (4) John Haggard, (5) Kent Vanderwood, (6) Marian Sheridan, (7) James Renner, (8) Amy Facchinello, (9) Rose Rook, (10) Hank Choate, (11) Mari-Ann Henry, (12) Clifford Frost, (13) Stanley Grot, (14) Timothy King, (15) Michele Lundgren, and (16) Kenneth Thompson with the following:

**Count 1 – Conspiracy to Commit Forgery**

38. On or about December 14, 2020, the above named individuals did unlawfully conspire, combine, confederate and agree together with Kathleen Berden, Mayra Rodriguez, Meshawn Maddock, and other persons to falsely make, alter, forge, or counterfeit a public record, with intent to injure or defraud, contrary to MCL 750.248, to-wit: Certificate of Votes of the 2020 Electors from Michigan; contrary to MCL 750.157a, a 14 year felony.

**Count 2 – Forgery**

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**People of the State of Michigan v Kathleen Berden, Mayra Rodriguez, Meshawn Maddock, John Haggard, Kent Vanderwood, Marian Sheridan, James Renner, Amy Facchinello, Rose Rook, William Choate, Mari-Ann Henry, Clifford Frost Jr., Stanley Grot, Timothy King, Michele Lundgren, Kenneth Thompson**

**Affidavit in Support of Complaint**

<b>STATE OF MICHIGAN DISTRICT COURT</b>	<b>AFFIDAVIT IN SUPPORT OF COMPLAINT</b>	<b>CASE NO. 2022-0343234-A DISTRICT CT. NO. CIRCUIT CT. NO.</b>
---	--	---

39. On or about December 14, 2020, the above-named individuals did falsely make, alter, forge, or counterfeit a public record, to wit President, with intent to injure or defraud, to-wit: Certificate of Votes of the 2020 Electors from Michigan; contrary to MCL 750.248 a 14-year felony.

### **Count 3 – Forgery**

40. On or about December 14, 2020, the above-named individuals did falsely make, alter, forge, or counterfeit a public record, to wit Vice-President, with intent to injure or defraud, to-wit: Certificate of Votes of the 2020 Electors from Michigan; contrary to MCL 750.248, a 14-year felony.

### **Count 4 – Conspiracy to Commit Uttering and Publishing**

41. On or about December 14, 2020, the above named individuals did unlawfully conspire, combine, confederate, and agree together with Kathleen Berden, Mayra Rodriguez, Meshawn Maddock, and other persons, to, contrary to MCL 750.249, utter and publish as true, a certain false, forged, altered or counterfeit record, instrument, or other writing, with intent to injure or defraud, knowing said instrument to be false, altered, forged or counterfeit, said instrument more fully described as follows: Certificate of Votes of the 2020 Electors from Michigan; contrary to MCL 750.157a, a 14-year felony.

### **Count 5 – Uttering and Publishing**

42. On or about December 14, 2020, the above-named individuals did utter and publish as true, a certain false, forged, altered or counterfeit record, instrument, or other writing, with intent to injure or defraud, knowing said instrument to be false, altered, forged or counterfeit, said instrument more fully described as follows: Certificate of Votes of the 2020 Electors from Michigan; contrary to MCL 750.249, a 14-year felony.

### **Count 6 – Conspiracy to Commit Election Law - Forgery**

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**People of the State of Michigan v Kathleen Berden, Mayra Rodriguez, Meshawn Maddock, John Haggard, Kent Vanderwood, Marian Sheridan, James Renner, Amy Facchinello, Rose Rook, William Choate, Mari-Ann Henry, Clifford Frost Jr., Stanley Grot, Timothy King, Michele Lundgren, Kenneth Thompson**

**Affidavit in Support of Complaint**

43. On or about December 14, 2020, the above-named individuals did unlawfully conspire, combine, confederate, and agree together with Kathleen Berden, Mayra Rodriguez, Meshawn Maddock, and other persons, to knowingly make, file or otherwise publish a false document with the intent to defraud; contrary to MCL 168.933a, conspire to commit Election Law Forgery, contrary to MCL 750.157a, a 5-year felony.

**Count 7 – Election Law - Forgery**

44. On or about December 14, 2020, the above-named individuals did knowingly make, file or otherwise publish a false document with the intent to defraud; contrary to MCL 168.933a, a 5-year felony.

**Count 8– Election Law - Forgery**

45. On or about December 14, 2020, the above-named individuals did knowingly make, file or otherwise publish a false document with the intent to defraud; contrary to MCL 168.933a, a 5-year felony.

WHEREFORE, the facts and circumstances developed during an investigation demonstrate probable cause to believe that each of the 16 Michigan residents named herein committed criminal offenses under Michigan Law.

Howard Shock  
Affiant



Reviewed on 18 July 2023

Michigan Department of Attorney General  
LaDonna Logan, P69715  
Assistant Attorney General  
Criminal Trials & Appeals Division

**People of the State of Michigan v Kathleen Berden, Mayra Rodriguez, Meshawn Maddock, John Haggard, Kent Vanderwood, Marian Sheridan, James Renner, Amy Facchinello, Rose Rook, William Choate, Mari-Ann Henry, Clifford Frost Jr., Stanley Grot, Timothy King, Michele Lundgren, Kenneth Thompson**

**Affidavit in Support of Complaint**

<b>STATE OF MICHIGAN DISTRICT COURT</b>	<b>AFFIDAVIT IN SUPPORT OF COMPLAINT</b>	<b>CASE NO. 2022-0343234-A DISTRICT CT. NO. CIRCUIT CT. NO.</b>
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3030 W. Grand Blvd., Suite 10-200  
Detroit, MI 48202

Subscribed and Sworn before me on: \_\_\_\_\_

**Honorable** \_\_\_\_\_  
Judge/Magistrate –54A District Court

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**People of the State of Michigan v Kathleen Berden, Mayra Rodriguez, Meshawn Maddock,  
John Haggard, Kent Vanderwood, Marian Sheridan, James Renner, Amy Facchinello,  
Rose Rook, William Choate, Mari-Ann Henry, Clifford Frost Jr., Stanley Grot, Timothy  
King, Michele Lundgren, Kenneth Thompson**

**Affidavit in Support of Complaint**