

STATE OF MICHIGAN  
DEPARTMENT OF ATTORNEY GENERAL



MIKE COX  
ATTORNEY GENERAL

CADILLAC PLACE  
3030 WEST GRAND BOULEVARD  
DETROIT, MICHIGAN 48202

March 24, 2009

VIA FACSIMILE

Kym L. Worthy  
Wayne County Prosecutor  
1441 St. Antoine  
Detroit, MI 48226  
Fx: 313-224-8180

Dear Ms. Worthy:

Re: *People v Karen Plants, et al*—36<sup>th</sup> District Court File 09-057635

Attorney General Cox has asked me to notify you that he has filed a complaint in your county. A copy of the complaint is attached. Should you receive any communications from the court clerk concerning this case, we would appreciate it if you would forward it to the undersigned. Similarly, any media contacts concerning this case should be forwarded to our communications staff at 517-373-8060.

If you have any questions, please feel free to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read 'W. A. Rollstin', with a long horizontal line extending to the right.

William A. Rollstin  
First Assistant Attorney General  
Criminal Division  
Suite 10-350  
(313) 456-0180

Attachment

District Court ORI: MI820615J  
1441 ST. ANTOINE DETROIT, MI 48226

Circuit Court ORI: MI820025J  
1441 St. Antoine, Detroit, Michigan 48226 313-224-2520

AG ORI:  
MI820025A

**THE PEOPLE OF THE STATE OF MICHIGAN**

**09057635**

**KAREN KRISTINA PLANTS 96-09900680-01**  
**ROBERT JOSEPH MCARTHUR 96-09900680-02**  
**SCOTT ALLEN RECHTZIGEL 96-09900680-03**  
**MARY MANDANA WATERSTONE 96-09900680-04**

**DOB:**  
**12/09/1962**  
**02/13/1967**  
**09/27/1970**  
**11/19/1939**

Victim or complainant: <b>STATE OF MICHIGAN</b>		Complaining Witness <b>S/A MICHAEL ONDEJKO</b>	Date: On or about <b>03/11/2005 - 10/06/2005</b>
City/Twp./Village <b>DETROIT</b>		County in Michigan <b>Wayne</b>	
Charge(s) <b>See Below</b>		Maximum Penalty <b>See Below</b>	

**STATE OF MICHIGAN, COUNTY OF WAYNE**

The complaining witness says that on the above date and at City of Detroit, the defendant(s), contrary to law,

**COUNT 1 DEFENDANT(S) (01, 02, 03): CONSPIRACY- To Commit Perjury**  
did unlawfully conspire, combine, confederate and agree together with one another to commit perjury in a court proceeding in the cases of People of the State of Michigan v. Alexander Aceval (3rd Judicial Circuit Court Case No. 05-3228-01) and/or People of the State of Michigan v. Ricardo Pena (3rd Judicial Circuit Court Case No. 05-3228-02) ; contrary to MCL 750.157a. [750.157A]  
**FELONY: Life and/or \$10,000.00 fine**

**COUNT 2 DEFENDANT(S) (02, 03): COMMON LAW OFFENSES**  
did commit Misconduct in Office, an indictable offense at common law, by creating police reports that contained false or misleading information; contrary to MCL 750.505. [750.505-C]  
**FELONY: 5 Years and/or \$10,000.00**

**COUNT 3 DEFENDANT(S) (01): COMMON LAW OFFENSES**  
did commit Misconduct in Office, an indictable offense at common law, by corruptly failing to make required disclosures to the defense or providing the defense false or misleading information; contrary to MCL 750.505. [750.505-C]  
**FELONY: 5 Years and/or \$10,000.00**

**COUNT 4 DEFENDANT(S) (01): COMMON LAW OFFENSES**  
did commit Misconduct in Office, an indictable offense at common law, by corruptly failing to correct false or misleading evidence; contrary to MCL 750.505. [750.505-C]  
**FELONY: 5 Years and/or \$10,000.00**

**COUNT 5 DEFENDANT(S) (01): COMMON LAW OFFENSES**  
did commit Misconduct in Office, an indictable offense at common law, by corruptly engaging in improper ex parte communications with Judge Mary Waterstone on September 8, 2005; contrary to MCL 750.505. [750.505-C]  
**FELONY: 5 Years and/or \$10,000.00**

**COUNT 6 DEFENDANT(S) (01): COMMON LAW OFFENSES**  
did commit Misconduct in Office, an indictable offense at common law, by corruptly engaging in improper ex parte communications with Judge Mary Waterstone on September 19, 2005; contrary to MCL 750.505. [750.505-C]  
**FELONY: 5 Years and/or \$10,000.00**

**COUNT 7 DEFENDANT(S) (01): COMMON LAW OFFENSES**

did commit Misconduct in Office, an indictable offense at common law, by corruptly making false or misleading statements in her objections and arguments before the jury; contrary to MCL 750.505. [750.505-C]  
FELONY: 5 Years and/or \$10,000.00

**COUNT 8 DEFENDANT(S) (02): PERJURY - COURT PROCEEDING**

being lawfully required to depose the truth as a witness in a court proceeding in the case of People of the State of Michigan v. Alexander Aceval (3rd Judicial Circuit Court Case No. 05-3228-01) and/or People of the State of Michigan v. Ricardo Pena (3rd Judicial Circuit Court Case No. 05-3228-02), the case being a capital crime before the 3rd Judicial Circuit Court, did commit perjury on September 16, 2005, by testifying falsely about his surveillance of J-Dubbs Bar in Riverview, Michigan, on March 11, 2005; contrary to MCL 750.422. [750.422-B]  
FELONY: Life

**COUNT 9 DEFENDANT(S) (02): PERJURY - COURT PROCEEDING**

being lawfully required to depose the truth as a witness in a court proceeding in the case of People of the State of Michigan v. Alexander Aceval (3rd Judicial Circuit Court Case No. 05-3228-01) and/or People of the State of Michigan v. Ricardo Pena (3rd Judicial Circuit Court Case No. 05-3228-02), the case being a capital crime before the 3rd Judicial Circuit Court, did commit perjury on September 19, 2005 by testifying falsely about the phone possessed by Mr. Chad Povish; contrary to MCL 750.422. [750.422-B]  
FELONY: Life

**COUNT 10 DEFENDANT(S) (03): PERJURY - COURT PROCEEDING**

being lawfully required to depose the truth as a witness in a court proceeding in the case of People of the State of Michigan v. Alexander Aceval (3rd Judicial Circuit Court Case No. 05-3228-01) and/or People of the State of Michigan v. Ricardo Pena (3rd Judicial Circuit Court Case No. 05-3228-02), the case being a capital crime before the 3rd Circuit Court, did commit perjury by testifying falsely on September 6, 2005, about his relationship with Mr. Chad Povish; contrary to MCL 750.422. [750.422-B]  
FELONY: Life

**COUNT 11 DEFENDANT(S) (03): PERJURY - COURT PROCEEDING**

being lawfully required to depose the truth as a witness in a court proceeding in the case of People of the State of Michigan v. Alexander Aceval (3rd Judicial Circuit Court Case No. 05-3228-01) and/or People of the State of Michigan v. Ricardo Pena (3rd Judicial Circuit Court Case No. 05-3228-02), the case being a capital crime before the 3rd Circuit Court, did commit perjury by testifying falsely on September 14, 2005, about his relationship with Mr. Chad Povish; contrary to MCL 750.422. [750.422-B]  
FELONY: Life

**COUNT 12 DEFENDANT(S) (04): COMMON LAW OFFENSES**

did commit Misconduct in Office, an indictable offense at common law, by willfully neglecting her judicial duties by permitting or considering an improper ex parte communication on September 8, 2005 and concealing that communication from the defendants in the case of People of the State of Michigan v. Alexander Aceval and/or People of the State of Michigan v. Ricardo Pena; contrary to MCL 750.505. [750.505-C]  
FELONY: 5 Years and/or \$10,000.00

**COUNT 13 DEFENDANT(S) (04): COMMON LAW OFFENSES**

did commit Misconduct in Office, an indictable offense at common law, by willfully neglecting her judicial duties by permitting or considering an improper ex parte communication on September 19, 2005 and concealing that communication from the defendants in the case of People of the State of Michigan v. Alexander Aceval and/or People of the State of Michigan v. Ricardo Pena; contrary to MCL 750.505. [750.505-C]  
FELONY: 5 Years and/or \$10,000.00

**COUNT 14 DEFENDANT(S) (04): COMMON LAW OFFENSES**

did commit misconduct in Office, an indictable offense at common law, by willfully neglecting her judicial duties by concealing perjured testimony from the defendants in the case of People of the State of Michigan v. Alexander Aceval and/or People of the State of Michigan v. Ricardo Pena by her rulings and orders; contrary to MCL 750.505. [750.505-C]

FELONY: 5 Years and/or \$10,000.00

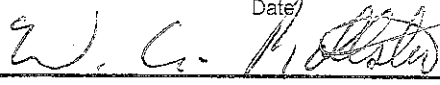
**COUNT 15 DEFENDANT(S) (04): COMMON LAW OFFENSES**

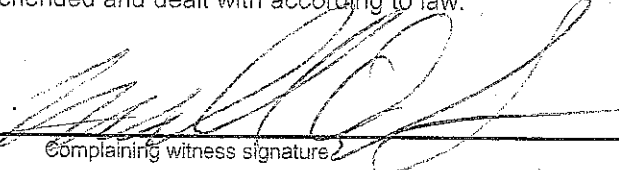

did commit Misconduct in Office, an indictable offense at common law, by willfully neglecting her judicial duties by allowing perjured testimony be heard by the jury in the case of People of the State of Michigan v. Alexander Aceval and/or People of the State of Michigan v. Ricardo Pena; contrary to MCL 750.505. [750.505-C]

FELONY: 5 Years and/or \$10,000.00

Upon conviction of a felony or an attempted felony court shall order law enforcement to collect DNA identification profiling samples.

The complaining witness asks that defendant(s) be apprehended and dealt with according to law.

Warrant authorized on <u>3-23-09</u> by: <small>Date/</small>  William Rolistin (P40771) First Assistant Attorney General Michigan Department of Attorney General Criminal Division Cadillac Place - 10th Floor 3030 W. Grand Boulevard Detroit, MI 48202 313-456-0180
--

 Complainant witness signature
Subscribed and sworn to before me on <u>3/24/09</u> <small>Date</small>
 Judge/Magistrate/Clerk
Bar no.

CHIEF MAGISTRATE  
STEVE LOCKHART