

DRB

STATE OF MICHIGAN  
76TH JUDICIAL DISTRICT  
21ST JUDICIAL CIRCUIT

COMPLAINT FELONY  
 AMENDED

CASE NO. and JUDGE

Honorable **22-1505** FY

District Court ORI: MI-370015J  
300 N. MAIN STREET MT. PLEASANT, MI 48858 989-772-0911

Circuit Court ORI: MI-370025J  
300 N. MAIN STREET MT. PLEASANT, MI 48858 989-772-0911

THE PEOPLE OF <input checked="" type="checkbox"/> The State of Michigan	v	Defendant's name and address KENDRA GAIL LICARI	Victim or complainant Sheriff MICHAEL MAIN
		Alias: [REDACTED]	Complaining witness
Codefendant(s) (if known)			Date: On or about 09/13/2021
City/Twp./Village Nottawa Township	County in Michigan ISABELLA	Defendant TCN	Defendant CTN 37-22-001376-01
Defendant SID	Defendant DOB Put DOB in Ref. No. row 1 on MC 97	Police agency report no. 37ICSD 370019622	Charge See below
Maximum penalty See below		Defendant DLN Put DLN in Ref. No. row 3 on MC 97	Vehicle Type.
<input type="checkbox"/> A sample for chemical testing for DNA identification profiling is on file with the Michigan State Police from a previous case.		<input type="checkbox"/> Oper/Chauf. <input type="checkbox"/> CDL	

Witnesses

Dan Boyer	Shawn Paul Licari	B. S.
William Chillman	SA Travis Lloyd	E. S.
Detective Sergeant SCOTT CLARKE	Sheriff MICHAEL MAIN	E. T.
A. C.	Dave McKenny	S. W.
Deputy LEVI DAVIS	Jill McKenny	Craig Wilson
K. H.	O. M.	K. W.
M. J.	Cooper Ray McQueen	Tammy Wilson
L. L.	Ofc Bradley Peter	
	A. R.	

STATE OF MICHIGAN, COUNTY OF ISABELLA

The complaining witness says that on the date and at the location described, the defendant, contrary to law,

COUNT 1: STALKING A MINOR

On or about from September 13, 2021 to February 28, 2022, did engage in a willful course of conduct involving repeated or continuing harassment of Confidential Victim O.M., while being 5 or more years older than Confidential Victim O.M., who was less than 18 years of age at some time during this course of conduct, the conduct being such that would cause a reasonable person to feel harassed, and such conduct did cause Confidential Victim and O.M. to feel harassed; contrary to MCL 750.411h(2)(b). [750.411H2B]

FELONY: 5 Years and/or \$10,000.00; up to 5 years probation

COUNT 2: COMPUTERS - INTERNET - COMMUNICATING WITH ANOTHER TO COMMIT CRIME - MAXIMUM IMPRISONMENT OF 4 YEARS OR MORE BUT LESS THAN 10 YEARS

On or about from September 13, 2021 to February 28, 2022, did use a computer and the Internet to communicate with Confidential Victim O.M. for the purpose of committing MCL 750.411H2B Stalking a Minor, where the victim or intended victim, O.M., was a minor; contrary to MCL 750.145d(2)(d). [750.145D2D]

SORA NOTICE: This is a Tier II Offense under the Sex Offender Registration Act (SORA) if the underlying offense is a violation of MCL 750.145 or 750.520g. It is a Tier III Offense if the Defendant has a prior conviction for a Tier II Offense. MCL 28.722(u) & (v).

FELONY: 10 Years and/or \$5,000.00; reimburse government for expenses incurred in relation to violation in manner indicated by MCL 769.1f (see MCL 750.145d(8)). A consecutive sentence may be imposed for a conviction on the underlying offense.

FILED

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**COUNT 3: STALKING A MINOR**

On or about from September 13, 2021 to February 28, 2022, did engage in a willful course of conduct involving repeated or continuing harassment of Confidential Victim L.L., while being 5 or more years older than Confidential Victim L.L., who was less than 18 years of age at some time during this course of conduct, the conduct being such that would cause a reasonable person to feel harassed, and such conduct did cause Confidential Victim and L.L. to feel harassed; contrary to MCL 750.411h(2)(b). [750.411H2B]

FELONY: 5 Years and/or \$10,000.00; up to 5 years probation

**COUNT 4: COMPUTERS - INTERNET - COMMUNICATING WITH ANOTHER TO COMMIT CRIME - MAXIMUM IMPRISONMENT OF 4 YEARS OR MORE BUT LESS THAN 10 YEARS**

On or about from September 13, 2021 to February 28, 2022, did use a computer and the Internet to communicate with Confidential Victim L. L. for the purpose of committing MCL 750.411H2B Stalking A Minor, where the victim or intended victim, L. L., was a minor; contrary to MCL 750.145d(2)(d). [750.145D2D]

SORA NOTICE: This is a Tier II Offense under the Sex Offender Registration Act (SORA) if the underlying offense is a violation of MCL 750.145 or 750.520g. It is a Tier III Offense if the Defendant has a prior conviction for a Tier II Offense. MCL 28.722(u) & (v).

FELONY: 10 Years and/or \$5,000.00; reimburse government for expenses incurred in relation to violation in manner indicated by MCL 769.1f (see MCL 750.145d(8)). A consecutive sentence may be imposed for a conviction on the underlying offense.

**COUNT 5: OBSTRUCTION OF JUSTICE**

On or about from September 13, 2021 to February 28, 2022, did commit the crime of obstruction of justice by attempting to frame another student for the crime during the stalking investigation.; contrary to MCL 750.505. [750.505-A]

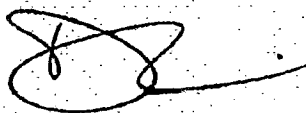
NOTE: This is a common law crime - the classic example is preventing a witness from testifying (see People v Somma, 123 Mich App 658).

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

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

Warrant authorized on December 8, 2022 by:

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.



Prosecuting Official David R. Barberi P77651

Complaining witness signature

12-12-22  
Date

DRB

<b>STATE OF MICHIGAN</b> <b>76TH JUDICIAL DISTRICT</b> <b>21ST JUDICIAL CIRCUIT</b>	<b>BINDOVER/TRANSFER AFTER</b> <b>PRELIMINARY EXAMINATION</b> <b>FELONY</b>	<b>CASE NO. and JUDGE</b>  <b>Honorable</b>
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District Court ORI: MI-370015J 300 N. MAIN STREET MT. PLEASANT, MI 48858 989-772-0911	Circuit Court ORI: MI-370025J 300 N. MAIN STREET MT. PLEASANT, MI 48858 989-772-0911
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<b>THE PEOPLE OF</b> <input checked="" type="checkbox"/> The State of Michigan	v	Defendant's name and address <b>KENDRA GAIL LICARI</b> Alias: <div style="background-color: black; width: 100px; height: 15px;"></div>	Victim or complainant <b>Sheriff MICHAEL MAIN</b>  Complaining witness
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Codefendant(s) (if known)	Date: On or about <b>09/13/2021</b>
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City/Twp./Village	County in Michigan	Defendant TCN	Defendant CTN	Defendant SID	Defendant DOB Put DOB in Ref. No. row 1 on MC 97
<b>3711 Nottawa Township</b>	<b>ISABELLA</b>		<b>37-22-001376-01</b>		

Police agency report no. <b>371CSD 370019622</b>	Charge <b>See below</b>	Maximum penalty <b>See below</b>
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<input type="checkbox"/> A sample for chemical testing for DNA identification profiling is on file with the Michigan State Police from a previous case.	<input type="checkbox"/> Oper/Chauf. <input type="checkbox"/> CDL	Vehicle Type	Defendant DLN Put DLN in Ref. No. row 3 on MC 97
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Date: \_\_\_\_\_ District judge: \_\_\_\_\_

Reporter/Recorder	Cert. no.	Represented by counsel	Bar no.
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**EXAMINATION WAIVER**

1. I, the defendant, understand:
  - a. I have a right to employ an attorney.
  - b. I may request a court-appointed attorney if I am financially unable to employ one.
  - c. I have a right to a preliminary examination where it must be shown that a crime was committed and probable cause exists to charge me with the crime.
2. I voluntarily waive my right to a preliminary examination and understand that I will be bound over to circuit court on the charges in the complaint and warrant (or as amended).

Defendant attorney	Bar no.	Defendant
I consent to this waiver:		P77651
Prosecuting attorney	Bar no.	

**ADULT BINDOVER**

3. Examination was waived on \_\_\_\_\_ Date
4. Examination was held on \_\_\_\_\_ and it was found that probable cause exists to believe both that an offense not cognizable by the district court has been committed and that the defendant committed the offense.
5. The defendant is bound over to circuit court to appear on \_\_\_\_\_ at \_\_\_\_\_ Date \_\_\_\_\_ Time \_\_\_\_\_
- on the charge(s) in the complaint.
- on the amended charge(s) of \_\_\_\_\_

<input type="checkbox"/> 6. Bond is set in the amount of \$ _____	MCL/PACC Code _____	Type of bond: _____	<input type="checkbox"/> Posted
_____ Judge signature and date			

