

# **CRIMINAL REFERRAL**

**DATE:** May 29, 2026

**FROM:**

Patrick J. Colbeck  
Former Michigan State Senator, 7th District  
Citizen Advocate for Election Integrity

**TO:**

**Dan Bishop**

United States Attorney, Middle District of North Carolina  
Justice Department Election-Investigation Leadership  
101 South Edgeworth Street  
Greensboro, NC 27401

**PRIMARY FEDERAL REFERRAL**

**AND TO:**

**United States Department of Justice**

Civil Rights Division  
950 Pennsylvania Avenue, NW  
Washington, D.C. 20530

**SECONDARY FEDERAL CIVIL-RIGHTS REFERRAL**

**AND TO:**

**Michigan Legislature**

Government Oversight and Election Oversight Leadership  
Lansing, Michigan

**SECONDARY LEGISLATIVE REFERRAL**

**RE: Criminal Referral — Jonathan Brater, Director, Michigan Bureau of Elections**

**Potential Violations:**

- Perjury — MCL 750.422

- False Statements in Official Proceedings
- Deprivation of Rights Under Color of Law — 18 U.S.C. § 242
- Conspiracy Against Rights — 18 U.S.C. § 241
- Abuse of Official Capacity / Misconduct in Office

## I. IDENTITY OF SUBJECT

### Jonathan Brater

Director, Michigan Bureau of Elections  
 Michigan Department of State  
 430 W. Allegan St.  
 Lansing, MI 48918

## II. BASIS FOR REFERRAL

I, Patrick J. Colbeck, former Michigan State Senator and long-standing election integrity advocate, submit this criminal referral requesting immediate investigation of Jonathan Brater, Director of the Michigan Bureau of Elections, for materially contradictory sworn testimony across multiple official proceedings, and for the Bureau's systematic use of unlawful, non-APA-compliant directives to threaten, intimidate, and facilitate the prosecution of Michigan citizens, clerks, and attorneys.

This referral is supported by sworn transcripts prepared by Hanson Renaissance Court Reporters (313-567-8100; [hansonreporting.com](http://hansonreporting.com)), synthesized in the evidentiary document *The Brater Contradiction: Authority, Security, and Contradiction*, and corroborated by judicial findings referenced herein.

## III. FACTUAL ALLEGATIONS

### A. Perjury and False Swearing — MCL 750.422

Michigan law prohibits willfully making a false statement in a sworn proceeding. The following material contradictions between Director Brater's 2023 Grand Jury testimony and his 2025 Hillsdale County trial admissions support a probable cause determination that false sworn statements were made in one or both proceedings:

ISSUE	2023 GRAND JURY (SWORN)	2025 HILLSDALE TRIAL (SWORN)
FORCE OF BUREAU DIRECTIVES	Mandatory; legally binding on all clerks	Bypassed APA; lack force of law

<b>LEGAL FOUNDATION</b>	Grounded in statute, case law, tradition	Relies on outdated 1964 case no longer controlling authority
<b>CRIMINAL THREAT LETTERS</b>	Legally rigorous and sound	AG review merely discretionary, not routine
<b>CLERK SUBORDINATION</b>	Clerks must unconditionally follow Bureau instructions	Clerks have independent statutory authority in tension with Bureau directives
<b>TECHNICAL EXPERTISE</b>	Bureau technically rigorous	Admitted lack of knowledge on EPB flash drive data retention

At least one of these sworn accounts is materially false. Investigators are requested to determine which statements were made with knowledge of their falsity.

## **B. Deprivation of Rights Under Color of Law — 18 U.S.C. § 242**

Director Brater, acting under color of his official authority, caused criminal threat letters to be issued to Michigan clerks and contributed to prosecutorial referrals against citizens — all premised on the false assertion that Bureau directives carried the force of law. Because those directives were never subjected to APA rule-making, they were legally incapable of forming the predicate for criminal liability.

The following individuals suffered documented harm as a direct result:

- **Stephanie Scott:** Stripped of her elected duties by the Bureau; charged with four felonies and one misdemeanor. Felony charges dismissed April 2026 after a judge found the lower court committed "an error of law." One misdemeanor remains pending — a charge premised on violation of a directive Brater has now admitted was not a lawful order.
- **Attorneys supporting election fraud investigations:** Attorneys who represented clerks, election-integrity advocates, and citizens seeking independent review of election equipment have faced criminal charges, arrests, professional retaliation, and reputational harm in a legal environment shaped by Bureau directives Brater later admitted lacked the force of law.
- **Sidney Powell:** Subject of sustained professional, legal, and bar disciplinary proceedings connected to her post-2020 election integrity advocacy in Michigan and other states — advocacy conducted in the same legal environment of official intimidation that Brater's Bureau helped create.

The harm to these individuals' First Amendment rights (to investigate and report on government conduct), Fourth Amendment rights (against unreasonable governmental interference), and Fourteenth Amendment due process rights is well-documented and directly traceable to the exercise of authority that Brater has since admitted was legally unsupported.

### **C. Conspiracy Against Rights — 18 U.S.C. § 241**

The pattern of conduct described herein — including coordinated use of non-APA-compliant directives, criminal referrals, and prosecutorial resources against a defined class of election integrity advocates — warrants investigation under the federal conspiracy against rights statute. The question of whether there was coordinated effort between Bureau of Elections officials, the Attorney General's office, and other state actors to suppress constitutionally protected election oversight activity must be examined.

### **D. Misconduct in Office / Abuse of Official Capacity**

Director Brater appeared before a Grand Jury and provided sworn testimony that overstated his legal authority, the legal foundation of his directives, and the rigor of criminal review processes. That testimony was then used — directly or indirectly — to support prosecutions against citizens and attorneys. His scheduled testimony tomorrow in bar proceedings against Sidney Powell represents a continuation of this pattern of using official credibility, now demonstrably compromised, to suppress election integrity advocacy.

## **IV. JUDICIAL CORROBORATION**

The factual basis of this referral is corroborated by independent judicial findings:

- In **April 2026**, Hillsdale County Circuit Court Judge Sara Lisznyai dismissed felony charges against Stephanie Scott and Stefanie Lambert, ruling the lower court had committed "an error of law" and "abused its discretion" in binding the defendants over for trial.
- In **July 2025**, during the Hillsdale County preliminary examination, Director Brater was cross-examined by defense attorney Kurt Olsen and was forced to admit, under oath, that his Bureau directives did not comply with the Administrative Procedures Act and lacked the force of law.
- Courts have acknowledged the legal tension between Bureau authority and the independent statutory authority of township clerks — directly contradicting Brater's 2023 Grand Jury testimony.

## **V. RELEVANCE TO JONATHAN BRATER'S TESTIMONY AGAINST SIDNEY POWELL**

Director Brater is scheduled to testify today against attorney Sidney Powell in disciplinary proceedings. The undersigned respectfully submits that:

1. A witness who has provided materially contradictory sworn testimony across official proceedings carries a fundamentally compromised evidentiary foundation;

2. Director Brater's official conduct directly contributed to the environment of governmental intimidation in which attorney Powell and other election-integrity advocates operated following the 2020 election;
3. His testimony against Powell appears designed, at least in part, to redirect scrutiny away from his own role in suppressing lawful investigation and in advancing directives he later admitted lacked the force of law;
4. Any reviewing authority evaluating Director Brater's testimony against Sidney Powell should consider this documented record before affording that testimony substantial weight.

## VI. REQUESTED ACTIONS


The undersigned respectfully requests:

1. **Dan Bishop** open or direct the primary federal election-integrity review of Director Brater's contradictory sworn testimony across the 2023 Grand Jury and 2025 Hillsdale trial proceedings, and of any prosecutorial reliance on directives that lacked the force of law;
2. The **U.S. DOJ Civil Rights Division** investigate potential violations of 18 U.S.C. § 242 and § 241 arising from the Bureau's issuance of criminal threats lacking lawful APA authority against identifiable Michigan citizens and their attorneys;
3. The **Michigan Legislature's Government Oversight Committee** subpoena all Bureau of Elections directives, criminal referral letters, and internal communications related to the 2021 tabulator access mandates;
4. Appropriate reviewing authorities examine whether any pending charge premised on a purportedly lawful order remains valid where the underlying directive was not promulgated through APA rulemaking.

## VII. DECLARATION

I submit this referral in good faith, grounded in sworn official transcripts, judicial rulings, and publicly documented prosecutorial records. I submit it in my capacity as a citizen of the State of Michigan, a former elected representative of its people, and as someone who has personally witnessed and documented the culture of official intimidation that Director Brater's Bureau has fostered against those who seek to independently verify the integrity of Michigan elections.

*Respectfully submitted,*



**Patrick J. Colbeck**

Former Michigan State Senator, 7th District

Aerospace Engineer | Microsoft Certified Small Business Specialist

Citizen Advocate for Election Integrity

PH: (734)262-9721

*Attachments:*

- *The Brater Contradiction: Authority, Security, and Contradiction* (Hanson Renaissance Court Reporters transcript synthesis)
- Hillsdale County Circuit Court Order — April 2026 (Scott/Lambert felony dismissal)

STATE OF MICHIGAN  
IN THE CIRCUIT COURT FOR THE COUNTY OF HILLSDALE

File No. 25-49-6230 FH

Hon. Sara S. Lisznyi

Plaintiff,

STATE OF MICHIGAN,

vs.

STEPHANIE SCOTT,

Defendant.

David A. Kallman (P34200)  
Attorney for Defendant  
5600 W. Mt. Hope Highway  
Lansing, MI 48917  
(517) 322-3207

Richard Cunningham (P29735)  
Assistant Attorney General  
3030 W Grand Blvd. Suite 10-354  
Detroit, MI 48202  
(517) 881-4509

STATE OF MICHIGAN  
IN THE CIRCUIT COURT FOR THE COUNTY OF HILLSDALE

File No. 25-49-6229 FH

Hon. Sara S. Lisznyi

Plaintiff,

STATE OF MICHIGAN,

vs.

STEFANIE LYNN JUNTILA,

Defendant.

Stefanie Lambert Junttila (P71303)  
In Pro Per  
400 Renaissance Center, 26<sup>th</sup> Floor  
Detroit, MI 49243  
(313) 410-6872

Richard Cunningham (P29735)  
Assistant Attorney General  
3030 W Grand Blvd. Suite 10-354  
Detroit, MI 48202  
(517) 881-4509

ORDER GRANTING MOTION TO QUASH BINDOVER

At a session of said Court, held in the Circuit Court for the  
City and County of Hillsdale, State of Michigan, on the

30th day of April, 2026

PRESENT: THE HONORABLE SARA S. LISZNYI, CIRCUIT JUDGE

This matter having come before the Court for a hearing on Defendant, Stephanie Scott's Motion to Quash Bindover, Assistant Attorney General Richard Cunningham appearing for the People of the State of Michigan, Defendant Stephanie Scott appearing with her attorney David Kallman, and Defendant Stefanie Junttila appearing, *in pro per*. The Court heard oral argument, allowed Defendant Junttila additional time to file a concurrence with the Motion to Quash Bindover, and took the matter under advisement.

The Court having now had an opportunity to review the transcripts, the pleadings and file, and Defendant Junttila having now joined in Defendant Scott's Motion to Quash Bindover through her unopposed motion dated April 15, 2026, and the Court being otherwise fully advised in the premises finds as follows:

1. That on December 18, 2024, July 11, 2025, August 11, 2025 and August 12, 2025 a preliminary examination was held in these matters in the Hillsdale County District Court.
2. That on November 26, 2025 Hillsdale District Court Judge Megan Stiverson bound Defendant, Stephanie Scott over to Circuit Court on all charges on the Complaint to include:

a. **Count 1** Computer-Unauthorized Access. This is a felony carrying a potential penalty of five (5) years imprisonment and/or a \$10,000.00; reimburse government for expenses incurred in relation to violation in manner indicated by MCL 769.1f.

b. **Count 2** Conspiracy to Commit Computers-Unauthorized Access. This is a felony carrying a potential penalty of five (5) years imprisonment and/or a \$10,000.00 and \$10,000.00 additional fee.

c. **Count 3** Computers-Using to Commit a Crime-Maximum Imprisonment of 4 Years or More but Less Than 10 Years. This is a felony carrying a potential penalty of seven (7) years and/or \$5,000.00; reimburse government for expenses incurred in relation to violation in manner indicated by MCL 769.1f. A consecutive sentence may be imposed for the underlying conviction.

d. **Count 4** Common Law Offenses. This is a felony carrying a potential penalty of five (5) years imprisonment and/or \$10,000.00.

3. On November 26, 2025 Hillsdale District Court Judge Megan Stiverson bound Defendant Stefanie Junttila over to Circuit Court on all charges on the Complaint to include:

a. **Count 1** Computer-Unauthorized Access. This is a felony carrying a potential penalty of five (5) years imprisonment and/or a \$10,000.00; reimburse

government for expenses incurred in relation to violation in manner indicated by MCL 769.1f.

b. **Count 2** Conspiracy to Commit Computers-Unauthorized Access. This is a felony carrying a potential penalty of five (5) years imprisonment and/or a \$10,000.00 and \$10,000.00 additional fee.

c. **Count 3** Computers-Using to Commit a Crime-Maximum Imprisonment of 4 Years or More but Less Than 10 Years. This is a felony carrying a potential penalty of seven (7) years and/or \$5,000.00; reimburse government for expenses incurred in relation to violation in manner indicated by MCL 769.1f. A consecutive sentence may be imposed for the underlying conviction.

4. On March 20, 2026 Stephanie Scott, through her attorneys, Kallman Legal Group timely filed her Motion to Quash and Dismiss pursuant to MCR 2.119.

5. On March 30, 2026 the People filed an Answer to Defendant's Motion to Quash.

6. On April 13, 2026 this Court heard oral argument on Defendant Scott's Motion to

Quash and Dismiss, and ordered that Defendant Junttila would have an additional

period of time to join the Motion to Quash.

7. On April 15, 2026 Defendant Junttila filed her Unopposed Motion to Join Defendant

Ms. Scott's March 20, 2026 Motion to Quash and Dismiss.

8. That the standard of proof for a bind over to circuit court is that probable cause exists that defendant committed the crime charged. *People v Duncan* 388 Mich 489, 201 NW2d 629 (1972).
9. A challenge to the District Court's interpretation of law applied to the facts presented at the exam is reviewed by the Circuit Court *de novo*. *People v Waltonen*, 272 Mich App 6787, 728 NW2d 881 (2006).
10. A court by definition abuses its discretion when it makes an error of law. *People v Giovannini*, 271 Mich App 409, 722 NW2d 237 (2006).
11. The People have taken the position that the felony charges bound over against both Defendants are based upon MCL 168.509g(1) being interpreted as having a confidentiality requirement that was violated by both Defendants.
12. MCL 168.509g is contained in Chapter XXIII Registration of Electors, is titled, "Information Exempt from the Freedom of Information Act" and section one reads as follows: (1) Subject to subsection (3), the information described in this subsection that is contained in a registration record is exempt from disclosure under the freedom of information act (FOIA), 1976 PA 442, MCL 15.231 to 15.246. The secretary of state, a designated voter registration agency, or a county, city, township, or village clerk shall not release a copy of that portion of a registration record that contains any of the following: (a) The record that an individual declined to register to vote. (b) The office that received a registered elector's application. (c) A registered elector's driver license or state personal identification card number. (d) The month and day of birth of a registered elector. (e) The telephone number that is provided by a registered elector. (f) The digitized signature of an elector that is captured or reproduced and transmitted to the qualified voter file by the secretary of state or a county, city, or township clerk under section 509h or by the secretary of state under section 307 of the Michigan vehicle code, 1949 PA 300, MCL 257.307.
13. The People have stated that this statute "must be viewed in the disjunctive", however no authority for this position is cited.

14. Additionally, the People's brief states that MCL 168.509g(1) imposes a duty on Defendants to not release that specific information, whether in response to the FOIA request **or otherwise** (emphasis added).
15. Defendants have taken the position that MCL 168.509g(1) is a declaration that the information listed cannot be disclosed pursuant to a FOIA request.
16. When interpreting a statute, courts "use the fair reading standard, where the text, context and statutory history are consulted to construe a statute as a reasonable reader would do." *Egan v Detroit*, 2025 Mich App LEXIS 2025.
17. In discerning legislative intent, a court must give effect to every word, phrase, and clause in a statute...and consider both the plain meaning of the critical word or phrase as well as its placement and purpose in the statutory scheme. The statutory language must be read and understood in its grammatical context, unless it is clear that something different was intended. If the language of a statute is unambiguous, the Legislature must have intended the meaning clearly expressed, and that statute must be enforced as written." *Shinholster v Annapolis Hosp.*, 471 Mich 540, 549, 685 NW2d 275 (2004).
18. "A necessary corollary...is that a court may read nothing into an unambiguous statute that is not within the manifest intent of the Legislature as derived from the words of the statute itself. *SBC Health Midwest, Inc. v City of Kentwood*, 500 Mich 65, 894 NW2d 535 (2017).
19. Contrary to the People's assertion, MCL 168.509g(1) does not contain additional language, such as "or otherwise".
20. Also contrary to the People's assertion, confidentiality is not imposed by MCL 168.509g(1) and the term "confidential" is not in this section.
21. MCL 168.509g(2) discusses the last four (4) digits of a registered elector's social security number being exempt from disclosure under a FOIA request.
22. Unlike MCL 168.509g(1), MCL 168.509g(2) does contain additional language "and must not be used or released for any other purpose."

23. In contrast to the information listed in section one, section two information is both "must not be used or released for any other purpose" and not subject to disclosure under FOIA.

24. MCL 168.509gg(3) is the only section of the statute to use the additional term "confidential" and it specifically refers to information contained in an individual's preregistration record. In contrast to the information listed in section one, section three information is both "confidential" and not subject to disclosure under the Freedom of Information Act.

25. There has been no claim by the People that MCL 168.509gg(2) or MCL 168.509gg(3) apply to the criminal charges at issue in this matter, but this Court notes that the Legislature treated the information referenced in those sections differently than it did the information in MCL 168.509gg(1), causing the section two and three information to be "must not be used or released for any other purpose" or "confidential" and not subject to disclosure under FOIA.

26. This Court must give effect to every word, phrase and clause, and may not read into an unambiguous statute.

27. Had the Legislature intended for MCL 169.509gg(1) to do more than exempt from disclosure under FOIA the information listed therein, it would have included additional language to do so. It did not.

28. Given all of the foregoing a fair reading of MCL 168.509gg(1) is that the listed information is not to be copied and released following a FOIA request. No additional requirement for nondisclosure or confidentiality is stated and none is found.

29. By finding that there was a basis to bind over the felony charges against both Defendants, the Hillsdale District Court made the finding that MCL 168.509gg(1) had a confidentiality requirement.

30. This Court finds that for the reasons stated herein, that was an error of law and by definition it abused its discretion.

**IT IS HEREBY ORDERED** that since the district court read MCL 168.509gg(1) as

having a confidentiality requirement that this Court finds does not exist, there is no longer a basis for one of the elements required to bind over Defendant Scott on Count I. Probable cause cannot be found that Defendant Scott accessed the computer without or exceeding her authority.

**IT IS FURTHER ORDERED** that for the same reasons, there is no longer a basis for

one of the elements required to bind over Defendant Scott on Count II. Probable cause cannot be found that Defendant Scott accessed the computer without or exceeding her authority, and therefore probable cause cannot be shown that she conspired to do so.

**IT IS FURTHER ORDERED** that because Counts I and II against Defendant Scott fail,

and because Count III is based upon a finding of probable cause that Defendant Scott committed either Count I or Count II, it too must be dismissed as lacking an element

required for bind over.

**IT IS HEREBY ORDERED** that since the district court read MCL 168.509gg(1) as

having a confidentiality requirement that this Court finds does not exist, there is no longer a basis for one of the elements required to bind over Defendant Junttila on Count I.

Probable cause cannot be found that Defendant Junttila accessed the computer without or exceeding her authority.

**IT IS FURTHER ORDERED** that for the same reasons, there is no longer a basis for

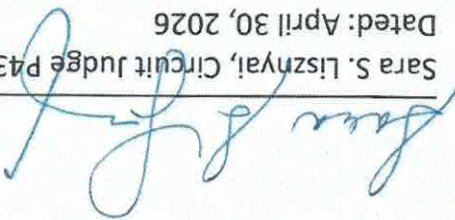
one of the elements required to bind over Defendant Junttila on Count II. Probable cause cannot be found that Defendant Junttila accessed the computer without or exceeding her authority, and therefore probable cause cannot be shown that she conspired to do so.

**IT IS FURTHER ORDERED** that because Counts I and II against Defendant Junttila

fail, and because Count III is based upon Defendant committed either Count I or Count II, it too must be dismissed as lacking an element required for bind over.

**IT IS FURTHER ORDERED** that the misdemeanor charge against Defendant Scott is remanded to the Hillisdale District Court for further proceedings. This was included in the bindover, but this Court does not have jurisdiction without the pending felony matters.

**IT IS FURTHER ORDERED** that any and all previous orders not in conflict with the foregoing shall remain in full force and effect.

  
Sara S. Lisznay, Circuit Judge P43799  
Dated: April 30, 2026

Proof of Service

On April 30, 2026, I did provide a true copy of this order to the Attorney General, Defendant and/or their attorneys, with the original being filed in the Hillisdale County Circuit Court.

  
Chelsea Jambly

## Conflicts Between Jonathan Brater's Grand Jury and Hilsdale Testimony

### 1. Authority and Legal Force of Instructions

- **Grand Jury Testimony:** Brater asserted that the Secretary of State and Bureau of Elections have supervisory control over local election officials, whose instructions *must* be followed. He presented the Bureau's instructions as mandatory, implying binding legal force compliant with Michigan law<sup>11</sup>.

- **Hilsdale Testimony:** Brater acknowledged many instructions/orders to local clerks had *not* gone through the required Administrative Procedures Act (APA), and thus lacked the "force of law." He admitted that rules not promulgated under the APA cannot result in criminal sanctions—contradicting the impression of binding legal effect given in his grand jury testimony<sup>12</sup>.

### 2. Basis for Binding Authority

- **Grand Jury:** Brater emphasized case law and Bureau tradition as the basis for issuing instructions and claimed authority based on statute.

- **Hilsdale:** He conceded that some cited case law (e.g., *Secretary of State v. Berrien County* from 1964) was outdated and not valid as an authority for current practices, since statutes and requirements for rule-making have changed since then. He admitted to relying on this outdated case law for authority in his official communications<sup>12</sup>.

### 3. Legal Review and Threat of Criminal Penalties

- **Grand Jury:** Brater portrayed the Bureau's procedures as rigorous, with instructions and penalties carefully aligned to legal requirements and subject to review.
- **Hilsdale:** He admitted uncertainty about whether legal advice from the Attorney General's office was always sought before sending letters threatening criminal penalties to clerks. He also admitted that Attorney General review of such instructions was discretionary, not routine, and implied there was potential for improper legal threats to be sent without proper review<sup>12</sup>.

#### 4. Technical Expertise and Data Retention

- **Grand Jury:** Brater presented himself as knowledgeable about election systems, security procedures, and data retention, emphasizing the Bureau's robust training and guidance to clerks.
- **Hillsdale:** He stressed that he is *not* a technical expert and showed uncertainty about data retention and deletion on election equipment, including not knowing if the Bureau's data deletion directives were fully compliant with state and federal law. He acknowledged that EPB (electronic poll book) flash drives contained original data not fully replicated elsewhere, and deletion could impact audits—an area in which his own directions may have contravened records retention requirements<sup>121</sup>.

#### 5. Local Clerk Authority

- **Grand Jury:** Brater stated local clerks must always follow Secretary of State/Bureau instructions and did not highlight independent clerical authority.
- **Hillsdale:** He admitted that township clerks have independent statutory authority for certain investigations, including voter registration, and are not strictly subordinate in those domains. He acknowledged statute gives clerks autonomy in some matters, sometimes in tension with Bureau directives<sup>121</sup>.

#### 6. Criminal Liability for Instructions

- **Grand Jury:** Brater implied that failure to follow Secretary of State instructions could result in criminal liability, as these were viewed as mandatory under state law.
- **Hillsdale:** He clarified that only "lawful" instructions, properly promulgated, could carry such liability and that any instruction not supported by law or not promulgated through the APA does *not* result in criminal penalties. He agreed that unlawful or improperly issued directives cannot be the legal basis for criminal prosecution<sup>121</sup>.

#### 7. Assumptions in Prosecution Materials

- **Grand Jury:** Brater asserted confidence that prosecution actions (e.g., affidavits of probable cause) rested on lawful instructions from his office.
- **Hillsdale:** He admitted the affidavits and probable cause determinations "assumed" the lawfulness of his instructions but that he could not definitively assert their legality, given the acknowledged procedural/APA deficiencies and legal uncertainties involved<sup>121</sup>.

**Summary Table: Key Assertion Conflicts**

Topic	Grand Jury Assertion	Hillsdale County Contradiction
Force of Law for Instructions	Binding, must be followed	Not binding without APA process
Criminal Liability for Non-Compliance	Failure can be criminally prosecuted	Only if instruction is lawful/APA-compliant
Legal Authority Basis	Case law and statute cited	Relled on outdated/invalid case law
Technical & Legal Clarity	Knowledgeable, well-reviewed process	Uncertain, sometimes no legal/tech review
Local Clerk Autonomy	Strictly subordinate to Bureau	Clerks have independent legal obligations
Prosecution Foundation	Bureau's authority presumed lawful	Lawfulness not assured, assumptions made

**Conclusion:**

Brater's grand jury testimony framed Bureau guidance as authoritative, routine, and reliably grounded in law and technical standards. His Hillsdale County testimony, under extensive examination, included admissions of legal and procedural uncertainty, lack of statutory support for some assertions, and recognition that many actions or instructions lacked the force of law or proper legal review—points which directly conflict with his prior broad claims of authority and rigor<sup>[2]</sup> [1].

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1. Brater\_Grand\_Jury\_Testimony.pdf

2. 2025.07.11-P-vs-Scott-Lambert-transcript.pdf