

OCT 15 2019

By: M. Navarro, Clerk
EAST COUNTY DIVISION

1 **LOUNSBERY FERGUSON ALTONA & PEAK LLP**
KRISTEN S. STEINKE, City Attorney/City Prosecutor
2 California State Bar No. 256931
MATTHEW C. STARR, Deputy City Attorney/ Deputy City Prosecutor
3 California State Bar No. 297614
960 Canterbury Place, Suite 300
4 Escondido, California 92025-3870
TEL: 760-743-1201 / FAX: 760-743-9926
5

6 Attorneys for Plaintiffs
7
8

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF SAN DIEGO – EAST COUNTY DIVISION**

11 THE PEOPLE OF THE STATE OF
CALIFORNIA, CITY OF LEMON GROVE,
12 Plaintiffs,
13 v.
14 TERESA ROSIAK
15 Defendant.

Case No.: C390703

COMPLAINT: MISDEMEANOR

17 The undersigned, certifying on information and belief, complains that in the East County
18 Judicial District, County of San Diego, State of California, Defendant Teresa Rosiak (“Defendant”)
19 did willfully and unlawfully commit the following crimes:

20 **CHARGES SUMMARY**

Count	Charge	Issue Type
21 1	LGMC § 9.08.030(B)	Misdemeanor
22 2	LGMC § 9.08.040(B)	Misdemeanor
23 3	LGMC § 9.08.040(C)	Misdemeanor

24 **CHARGES**

25 **COUNT 1 – LGMC § 9.08.030(B) – CAMPAIGN CONTRIBUTIONS**

26 On or before January 31, 2019, in the above-named judicial district, Defendant unlawfully
27 extended credit to her campaign for Lemon Grove City office, Teresa Rosiak for Lemon Grove City
28

1 Council 2019, Identification Number 14093311, in that Defendant extended credit to the campaign
2 for a period of more than thirty (30) days, in violation of Lemon Grove Municipal Code section
3 9.08.030(B), a misdemeanor.

4
5 **COUNT 2 – LGMC § 9.08.040(B) – SUPPLEMENTAL DISCLOSURE REQUIREMENTS**
6 **FOR INDEPENDENT EXPENDITURES**

7 On or before March 11, 2019, in the above-named judicial district, Defendant unlawfully
8 omitted the disclosure of expenditures related to Defendant’s campaign for Lemon Grove City
9 office, Teresa Rosiak for Lemon Grove City Council 2019, Identification Number 14093311, in that
10 Defendant failed to report the total amount of expenditures on California Form 460 campaign
11 statement reports filed with the City of Lemon Grove, during the period the report was made to
12 persons who have received one hundred dollars or more, in violation of LGMC § 9.08.040(B), a
13 misdemeanor.

14
15 **COUNT 3 - LGMC § 9.08.040(C) – SUPPLEMENTAL DISCLOSURE REQUIREMENTS**
16 **FOR INDEPENDENT EXPENDITURES**

17 On or before March 11, 2019, in the above-named judicial district, Defendant unlawfully
18 omitted the disclosure of expenditures related to Defendant’s campaign for Lemon Grove City
19 office, Teresa Rosiak for Lemon Grove City Council 2019, Identification Number 14093311, in
20 that Defendant failed to disclose each person to whom an expenditure of one hundred dollars or
21 more was made on California Form 460 campaign statement reports filed with the City of Lemon
22 Grove, during the period the report was made, in violation of LGMC § 9.08.040(C), a misdemeanor.

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 **DISCOVERY REQUEST**

2 Pursuant to Penal Code Section 1054.5(b), the People are hereby informally requesting that
3 defense counsel provide discovery to the People as required by Penal Code Section 1054.3.

4 Based on information and belief, I declare under penalty of perjury that the following is true
5 and correct and this Complaint consists of three (3) counts.

6 Executed this 2nd day of October, 2019, at Escondido, California, County of San Diego.

7
8 By: 

9 KRISTEN S. STEINKE
10 City Attorney/City Prosecutor
11 City of Lemon Grove
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28