

STATE OF MICHIGAN 7thW JUDICIAL DISTRICT 36TH JUDICIAL CIRCUIT

COMPLAINT FELONY

DISTRICT: 18000348 FY CIRCUIT: 18000345 FY

District Court ORI: MI800035J

1007 E. WELLS ST. SOUTH HAVEN, MI 49090 269-637-5258

Circuit Court ORI: MI800015J

AG ORI:

MI820025A

THE PEOPLE OF THE STATE OF MICHIGAN

v

ELENA DANISHEVSKAYA 96-18900356-01 TAMMY JEAN BARNES 96-18900356-02 DOB: 05/26/1968 12/31/1958

212 Paw Paw Street, Paw Paw, MI 49079 269-657-8218

Victim or complainant: STATE OF MICHIGAN	Complaining Witness S/A PETER ACKERLY	Date: On or about 12/01/2014 - 08/31/2015
City/Twp./Village	County in Michigan	
City of Bangor	Van Buren	
Charge(s)		Maximum Penalty
See Below		See Below

#### STATE OF MICHIGAN, COUNTY OF VAN BUREN

The complaining witness says that on the above date range and in City of Bangor, MI, the defendant(s), contrary to law,

### COUNT 1 DEFENDANT (01): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 04/06/2015, stating VIN 1G2ZG558464182922 for applicant/owner H & I Auto Sales of Detroit, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

# COUNT 2 DEFENDANT (01): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 04/06/2015, stating VIN 1J4GL48K14W142227 for applicant/owner H & I Auto Sales of Detroit, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

# COUNT 3 DEFENDANT (01): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 04/06/2015, stating VIN 2G1WT57KX91175033 for applicant/owner H & I Auto Sales of Detroit, MI.

contrary to MCL 750.249. [750.249]

### **COUNT 4 DEFENDANT (01): UTTERING AND PUBLISHING**

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 04/06/2015, stating VIN 1FAHP35N79W147758 for applicant/owner H & I Auto Sales of Detroit, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

# COUNT 5 DEFENDANT (01): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 04/08/2015, stating VIN 1GCDT136768170638 for applicant/owner Henri Adalberto C-S of Detroit, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

### COUNT 6 DEFENDANT (01): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 04/08/2015, stating VIN 19XFA1F55BE030895 for applicant/owner Henri Adalberto C-S of Detroit, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

### COUNT 7 DEFENDANT (01): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 04/08/2015, stating VIN 1HGCM66595A018667 for applicant/owner Jeyson L. of Allen Park, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

# COUNT 8 DEFENDANT (01): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

of good State of Michigan motor vehicle titles, on or about the indicated dates: 04/09/2015, stating VIN 5GAKRCKD3DJ201120 for applicant/owner Infiniti Mötor Group of Redford, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

#### **COUNT 9 DEFENDANT (01): UTTERING AND PUBLISHING**

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 04/09/2015, stating VIN 1G6AU5S86E0125880 for applicant/owner Infiniti Motor Group of Redford, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

# COUNT 10 DEFENDANT (01): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 04/11/2015, stating VIN WAUDH74F08N179301 for applicant/owner Infiniti Motor Group of Redford, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

# COUNT 11 DEFENDANT (01): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 04/14/2015, stating VIN 3VWJP7AT8DM661003 for applicant/owner Metro Auto Sales of Detroit, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

# COUNT 12 DEFENDANT (01): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 04/15/2015, stating VIN WAURFAFR8BA046591 for applicant/owner Star Tec Auto Sales.

contrary to MCL 750.249. [750.249]

### COUNT 13 DEFENDANT (01): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 04/15/2015, stating VIN 1LNHL9DK6DG605949 for applicant/owner Star Tec Auto Sales of Detroit, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

### COUNT 14 DEFENDANT (01): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 04/15/2015, stating VIN 1G6DP567650220557 for applicant/owner Ashley C. of Detroit, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

### COUNT 15 DEFENDANT (01): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 04/18/2015, stating VIN 1GNSKKE76DR243499 for applicant/owner Infiniti Motor Group of Redford, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

### COUNT 16 DEFENDANT (01): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 04/18/2015, stating VIN 1GNSKJE72DR170948 for applicant/owner Infiniti Motor Group of Redford, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

### COUNT 17 DEFENDANT (01): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

of good State of Michigan motor vehicle titles, on or about the indicated dates: 06/06/2015, stating VIN 1GNSKJE71ER217355 for applicant/owner Infiniti Motor Group of Redford, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

### COUNT 18 DEFENDANT (01): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 03/28/2015, stating VIN WBA5B1C59ED479108 for applicant/owner Infiniti Motor Group of Redford, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

#### COUNT 19 DEFENDANT (01): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 03/29/2015, stating VIN 1FAHP2KT0FG132974 for applicant/owner Infiniti Motor Group of Redford, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

# COUNT 20 DEFENDANT (01): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 03/30/2015, stating VIN 3G5DA03E43S584025 for applicant/owner EZ Used Auto Parts of Detroit, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

# COUNT 21 DEFENDANT (01): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 04/01/2015, stating VIN 1GKKVREDXCJ359983 for applicant/owner Elrayes Auto Sales, Inc. of Detroit, MI.

contrary to MCL 750.249. [750.249]

### COUNT 22 DEFENDANT (01); UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 04/01/2015, stating VIN 1HGCM56417A181088 for applicant/owner James Lee S. of Lincoln Park, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

### COUNT 23 DEFENDANT (01): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 04/01/2015, stating VIN 1LNHL9DR1AG612686 for applicant/owner James Lee S. of Lincoln Park, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

# COUNT 24 DEFENDANT (01): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 04/02/2015, stating VIN 2FMDK3JCOBBA42218 for applicant/owner Startec Auto Service, Inc. of Detroit, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

# COUNT 25 DEFENDANT (01): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 04/02/2015, stating VIN 1FTFW1EF3EKD72052 for applicant/owner Startec Auto Service, Inc. of Detroit, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

# COUNT 26 DEFENDANT (02): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

of good State of Michigan motor vehicle titles, on or about the indicated dates: 08/01/2015, stating VIN 2G1WT58K8811302214 for applicant/owner YMN Group of Melvindale, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

### COUNT 27 DEFENDANT (02): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 08/01/2015, stating VIN 2GNA1DEK2C6133472 for applicant/owner YMN Group of Melvindale, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

# COUNT 28 DEFENDANT (02): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 08/02/2015, stating VIN 1G11H5SL7EF271085 for applicant/owner SI Auto Sales of Detroit, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

# COUNT 29 DEFENDANT (02): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 08/02/2015, stating VIN 1G1AK18F387270445 for applicant/owner YMN Auto Group of Melvindale, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

# COUNT 30 DEFENDANT (02): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 08/02/2015, stating VIN 1G8AL58F772109587 for applicant/owner SI Auto Sales of Detroit, MI.

contrary to MCL 750.249. [750.249]

### COUNT 31 DEFENDANT (02): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 08/02/2015, stating VIN 5TETX2ZN862175361 for applicant/owner YMN Auto Group of Melvindale, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

#### COUNT 32 DEFENDANT (02): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 07/03/2015, stating VIN 5NPET46F28H381140 for applicant/owner YMN Auto Group of Melvindale, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

# COUNT 33 DEFENDANT (02): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 07/10/2015, stating VIN 2C4RC1BG4CR212487 for applicant/owner Platinum Company of Detroit, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

# **COUNT 34 DEFENDANT (02): UTTERING AND PUBLISHING**

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 07/12/2015, stating VIN 1FMFK165X8LA13261 for applicant/owner Rockwood LC of Detroit, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

# COUNT 35 DEFENDANT (02): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

of good State of Michigan motor vehicle titles, on or about the indicated dates: 07/12/2015, stating VIN 1J4RR6GT8BC701316 for applicant/owner SI Auto Sales of Detroit, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

#### COUNT 36 DEFENDANT (02): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 07/12/2015, stating VIN 1ZVBP8EM8C5287056 for applicant/owner Metro Detroit Auto Sales of Detroit, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

#### **COUNT 37 DEFENDANT (02): UTTERING AND PUBLISHING**

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 06/29/2015, stating VIN 3N1CN7AP2CL844490 for applicant/owner KJ Auto Sales of Redford, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

# COUNT 38 DEFENDANT (02): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 06/30/2015, stating VIN 1J4FA59S51P307532 for applicant/owner KJ Auto Sales of Redford, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

# COUNT 39 DEFENDANT (02): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 06/14/2015, stating VIN WAULL44E16N012863 for applicant/owner Syeed C. of Hamtramck, MI.

contrary to MCL 750.249. [750.249]

#### COUNT 40 DEFENDANT (02): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 05/23/2015, stating VIN 1G1AB5F51A7120339 for applicant/owner YMN Group of Melvindale, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

#### COUNT 41 DEFENDANT (02): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 05/23/2015, stating VIN 1G1PG5S84D7296653 for applicant/owner Mario O. of Fenton, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

#### COUNT 42 DEFENDANT (02): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 05/24/2015, stating VIN 1G2ZG58B674184857 for applicant/owner Big 3 Auto Sales of Detroit, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

#### COUNT 43 DEFENDANT (02): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, 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:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 05/24/2015, stating VIN 1GYFK66867R396035 for applicant/owner SI Auto Sales of Detroit, MI.

contrary to MCL 750.249. [750.249]

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 be apprehended and dealt with according to law.

Warrant authorized on クネ/ユロ/コロ/8	Vet T. Ack
by:	Date Complaining witness signature  Subscribed and sworn to before me on.
Michael G. Frezza (P46949) Section Head, Public Integrity Unit Michigan Department of Attorney General, Cadillac Place, 3030 W. Grand Blvd., Suite 10-200	Date
Detroit, MI 48202 (313) 456-0180	Judge/Magistrate/Cjerk Bar no.