

STATE OF MICHIGAN 37A JUDICIAL DISTRICT 16TH JUDICIAL CIRCUIT	COMPLAINT FELONY	DISTRICT: CIRCUIT: CTN: 96-21900164-01 MSP #:
District Court ORI: MI500025J	Circuit Court ORI: MI500015J	AG ORI: MI820025A

THE PEOPLE OF THE STATE OF MICHIGAN v KEVIN GORDON WOODS [REDACTED] HARRISON TOWNSHIP, MI 48045 Co-defendant(s)			Victim or complainant: STATE OF MICHIGAN
			Complaining Witness S/A PETE ACKERLY
City/Twp./Village WARREN	County in Michigan Macomb	Defendant SID	Date: On or about 03/01/2015-12/30/2019
Charge(s) See Below			Defendant DOB [REDACTED]
			Maximum Penalty See Below

STATE OF MICHIGAN, COUNTY OF MACOMB

The complaining witness says that on the date range above and in the City of Warren, Michigan, the defendant, contrary to law,

COUNT 1: FALSE PRETENSES - \$100,000.00 OR MORE

with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$100,000.00 or more; contrary to MCL 750.218(7)(a). [750.2187A].

FELONY: 20 Years and/or \$35,000.00, or 3 times the value of the money or property involved, whichever is greater. To impose a fine of 3 times the value, the defendant must admit the amount, or it must be determined by the trier of fact at trial. See *Southern Union Co. v United States* 567 U.S. ____; No. 11-94 (2012).

COUNT 2: FALSE PRETENSES - \$100,000.00 OR MORE

with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$100,000.00 or more; contrary to MCL 750.218(7)(a). [750.2187A].

FELONY: 20 Years and/or \$35,000.00, or 3 times the value of the money or property involved, whichever is greater. To impose a fine of 3 times the value, the defendant must admit the amount, or it must be determined by the trier of fact at trial. See *Southern Union Co. v United States* 567 U.S. ____; No. 11-94 (2012).

COUNT 3: FALSE PRETENSES - \$100,000.00 OR MORE

with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$100,000.00 or more; contrary to MCL 750.218(7)(a). [750.2187A].

FELONY: 20 Years and/or \$35,000.00, or 3 times the value of the money or property involved, whichever is greater. To impose a fine of 3 times the value, the defendant must admit the amount, or it must be determined by the trier of fact at trial. See *Southern Union Co. v United States* 567 U.S. ____; No. 11-94 (2012).

COUNT 4: FALSE PRETENSES - \$100,000.00 OR MORE

with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$100,000.00 or more; contrary to MCL 750.218(7)(a). [750.2187A].

FELONY: 20 Years and/or \$35,000.00, or 3 times the value of the money or property involved, whichever is greater. To impose a fine of 3 times the value, the defendant must admit the amount, or it must be determined by the trier of fact at trial. See *Southern Union Co. v United States* 567 U.S. ___; No. 11-94 (2012).

COUNT 5: MONEY LAUNDERING - 2ND DEGREE

did knowingly conduct, attempt to conduct, or participate in conducting or attempting to conduct a financial transaction involving a monetary instrument or other property of a value of \$10,000 or more, that constituted the proceeds or substituted proceeds of the crime of False Pretenses, while having prior actual knowledge that the monetary instrument or property represented the proceeds or substituted proceeds of a criminal offense, and that the financial transaction is designed in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds or to avoid a transaction reporting requirement under state or federal law, with the intent to conceal or disguise the nature, location, source, ownership, or control of said proceeds; contrary to MCL 750.411k and MCL 750.411n. [750.411N]

FELONY: 10 Years and/or \$100,000.00 or twice the value of the proceeds, whichever amount is greater

COUNT 6: FALSE PRETENSES - \$1,000.00 OR MORE BUT LESS THAN \$20,000.00

did, with the intent to defraud or cheat, make or use a false pretense to obtain from a person money, personal property, or the use of an instrument, facility, article, or other valuable thing or service, having a value of \$1,000.00 or more but less than \$20,000.00; contrary to MCL 750.218(4)(a). [750.2184A]

FELONY: 5 Years and/or \$10,000.00, or 3 times the value of the money or property involved, whichever is greater. To impose a fine of 3 times the value, the defendant must admit the amount, or it must be determined by the trier of fact at trial. See *Southern Union Co. v United States* 132 S. Ct. 2344 (2012).



COUNT 7: BRIBERY - AGENT/EMPLOYEE

did give, offer or promise a commission, gift, or gratuity to Aradondo Haskins with intent to influence the action of Aradondo Haskins, the agent or employee of Adamo Group, in relation to his or her principal's or employer's business; contrary to MCL 750.125. [750.125]

MISDEMEANOR: 1 Year and/or \$1,000.00

Court shall order law enforcement to collect a DNA identification profiling sample before sentencing or disposition, if not taken at arrest.

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

Warrant authorized on <u>2/22/2021</u>	
by: <u>Melissa Palepu</u>	Complaining witness signature
Melissa Palepu (P74121) Criminal Trials & Appeals Division 3030 W. Grand Blvd., Suite 10-300 Detroit, MI 48202 313-456-0180	Subscribed and sworn to before me on <u>Feb 23, 2021</u>
<input type="checkbox"/> Security for costs posted	Judge/Magistrate/Clerk  Bar no. <u>P-40733</u>