

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT	WARRANT FELONY	DISTRICT: CIRCUIT: CTN: 96-23901202-01 MSP #:
District Court ORI: MI820365J	Circuit Court ORI: MI821095J	AG ORI: MI820025A

THE PEOPLE OF THE STATE OF MICHIGAN	Defendant's name and address V DAVID RONALD HOLMAN [REDACTED]	Victim or complainant CITY OF DETROIT
	Co-defendant(s) (If known)	Complaining Witness S/A WILLIE SMITH
City/Twp./Village DETROIT	County in Michigan WAYNE	Defendant TCN 96-23901202-01
Defendant DOB [REDACTED]	Defendant DLN	Defendant CTN 96-23901202-01
Police agency report no 2023-0386918-A.	Charge See below	Defendant SID
	DLN Type:	Defendant Sex M
	Vehicle Type	Defendant Race W
	Maximum penalty See below	

A sample for chemical testing for DNA identification profiling is on file with the Michigan State Police from a previous case.

STATE OF MICHIGAN, COUNTY OF WAYNE
To any peace officer or court officer authorized to make arrest: The complaining witness has filed a sworn complaint in this court stating that on the date and the location described above, the defendant, contrary to law,

COUNT 1: CRIMINAL ENTERPRISES - CONDUCTING
being a person employed by or associated with an enterprise, to wit: Den-Man Contractors, Inc., did knowingly conduct or participate in the affairs of the enterprise directly or indirectly through a pattern of racketeering activity, consisting of two or more of the following incidents of racketeering, to wit:

From 01/2018 to 12/2018, in at approximately 54 various locations, defendant committed the following offense for financial to wit: in violation of MCL 750.218(7)(a) obtained financial gain by committing False Pretenses - \$100,000 or More, upon the Detroit Land Bank Authority and/or Detroit Building Authority by using improper backfill material for HHF Demolition Contracts from 2018 for approximately 54 residential locations and then misrepresented where the backfill material was sourced, resulting in a harm of approximately \$216,000.00 (Reference Count 2.);

From 01/2018 to 12/2018, at approximately 116 various locations within the City of Detroit, defendant committed the following offense for financial gain to wit: in violation of MCL 750.218(7)(a) obtained financial gain by committing False Pretenses - \$100,000 or More, upon the Detroit Land Bank Authority and/or Detroit Building Authority by using improper backfill material for Non-HHF Demolition Contracts from 2018 for approximately 116 residential locations and then misrepresented where the backfill material was sourced resulting in a harm of approximately \$464,000.00 (Reference Count 3.),

From 01/2018 to 12/2018, for various locations within the City of Detroit, defendant committed the following offense for financial gain to wit: in violation of MCL 750.218(7)(a) obtained financial gain by committing False Pretenses - \$100,000 or More, upon the Detroit Land Bank Authority and/or Detroit Building Authority by improperly invoicing for backfill material on HHF Demolition contracts for 2018 and thus receiving approximately \$144,578.00. (Reference Count 4.),

From 01/2018 to 12/2018, for various locations within the City of Detroit, defendant committed the following offense for financial gain, to wit: in violation of MCL 750.218(7)(a) obtained financial gain by committing False Pretenses - \$100,000 or more, upon the Detroit Land Bank Authority and/or Detroit Building Authority by improperly invoicing for backfill material on Non-HHF Demolition contracts for 2018 and thus receiving approximately \$326,670.00 (Reference Count 5.),

From 07/2017 to 12/2017, at approximately 18 various locations within the City of Detroit, defendant committed the following offense for financial gain, to wit: in violation of MCL 750.218(6)(a), obtained financial gain by committing False Pretenses - \$50,000 to \$100,000, upon the Detroit Land Bank Authority and/or Detroit Building

Authority, by using improper backfill material for HHF Demolition Contracts from 2017 for approximately 18 residential locations and then misrepresented where the backfill material was sourced resulting in a harm of approximately \$72,000.00 (Reference Count 6.),

From 07/2017 to 12/2017, at approximately 16 various locations within the City of Detroit, defendant committed the following offense for financial gain, to wit: in violation of MCL 750.218(6)(a) obtained financial gain by committing False Pretenses - \$50,000 to \$100,000, upon the Detroit Land Bank Authority and/or Detroit Building Authority by using improper backfill material for Non-HHF Demolition Contracts from 2017 for approximately 16 residential locations and then misrepresented where the backfill material was sourced resulting in a harm of approximately \$64,000.00 (Reference Count 7).,

From 07/2017 to 12/2017, at various locations within the City of Detroit, defendant committed the following offense for financial gain, to wit: in violation of MCL 750.218(4)(a) obtained financial gain by committing False Pretenses - \$1,000 or more but less than \$20,000, upon the Detroit Land Bank Authority and/or Detroit Building Authority by improperly invoicing for backfill material on HHF Demolition contracts for 2017 and thus receiving approximately \$7,954.34.(Reference Count 8.)

From 01/2019 to 12/2019, at 8088 Roselawn in the City of Detroit, defendant committed the following offense for financial gain, to wit: in violation of MCL 750.218(4)(a), obtained financial gain by committing False Pretenses - \$1,000 or more but less than \$20,000, upon the Detroit Land Bank Authority and/or Detroit Building Authority by improperly invoicing for backfill material on HHF Demolition contracts for 2019 and thus receiving approximately \$2,540.00 (Reference Count 9.),

From 07/2017 to 12/2017, at various locations within the City of Detroit, defendant committed the following offense for financial gain, to wit: in violation of MCL 750.218(4)(a) obtained financial gain by committing False Pretenses \$1,000 or more but less than \$20,000, upon the Detroit Land Bank Authority and/or Detroit Building Authority by improperly invoicing for backfill material on Non-HHF Demolition contracts for 2017 and thus receiving approximately \$15,813.50 (Reference Count 10.),

From 01/2018 to 12/2018, at various locations within the City of Detroit, defendant committed the following offense for financial gain, to wit: in violation of MCL 750.218(4)(a) obtained financial gain by committing False Pretenses \$1,000 or more but less than \$20,000, upon the Detroit Land Bank Authority and/or Detroit Building Authority by improperly invoicing for backfill material on Non-HHF Commercial Demolition contracts for 2018 and thus receiving approximately \$10,368.50 (Reference Count 11.).,

From 01/2019 to 12/2019, at various locations within the City of Detroit, defendant committed the following offense for financial gain, to wit: in violation of MCL 750.218(4)(a) obtained financial gain by committing False Pretenses - \$100,000 or More, upon the Detroit Land Bank Authority and/or Detroit Building Authority by improperly invoicing for backfill material on HHF Demolition contracts for 2019 and thus receiving approximately \$266,702.02 (Reference Count 12.).,

which had the same or a substantially similar purpose, participant(s), victims or method of commission, and which amount to or pose a threat of continued criminal activity; contrary to MCL 750.159i(1). [750.159i1]

NOTICE: Pursuant to MCL 750.159j(5), the following property was used in the course of, intended for use in the course of, derived from or realized through the racketeering conduct alleged herein, and upon conviction under MCL 750.159i, is subject to criminal forfeiture:

- (1) Real and Personal Property located at 4321 Blood Road, Metamora Township, MI with a legal description of Sec 15 T06N R10E The NE-NW-SW-SE of the SW QTR.

FELONY: 20 Years and/or \$100,000.00; criminal forfeiture of proceeds, substituted proceeds, and instrumentalities of racketeering listed on attached notification (see MCL 750.159j(4)); court may order court costs, costs of investigation, and/or costs of prosecution

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: 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 6: FALSE PRETENSES - \$50,000.00 OR MORE BUT LESS THAN \$100,000.00

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 \$72,000.00; contrary to MCL 750.218(6)(a). [750.2186A].

FELONY: 15 Years and/or \$25,000.00, 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 7: FALSE PRETENSES - \$50,000.00 OR MORE BUT LESS THAN \$100,000.00

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 \$64,000.00; contrary to MCL 750.218(6)(a). [750.2186A].

FELONY: 15 Years and/or \$25,000.00, 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 8: 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 9: 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 10: 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 11: 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 12: 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).

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

THE COURT FINDS probable cause to believe defendant committed the offense(s) set forth and that the following circumstance(s) apply:

- the complaint is for an assaultive crime or an offense involving domestic violence, as defined in MCL 764.1a.
- there is a reason to believe from the complaint that the person against whom the complaint is made will not appear on a summons
- the issuance of a summons poses a risk to public safety. the prosecutor has requested an arrest warrant.

THEREFORE, IN THE NAME OF THE PEOPLE OF THE STATE OF MICHIGAN, I order you to arrest and bring defendant before the **36** District Court immediately.

The defendant may be released before arraignment if \$ _____ is posted as interim bail

by _____
Date

11-27-23

Date

(SEAL)

William T. Burton, Jr.

Judge/Magistrate

P59190

Bar no.

See return on next page.

MC 200w (9/22) FELONY SET, Warrant (PACC-PAAM Replacement)

MCL 764.1 et seq., MCL 766.1 et seq., MCL 767.1 et seq., MCR 6.102

RETURN

As ordered in this warrant, the defendant was arrested on _____ at _____
Date Time

at _____
Place of arrest

Date

Peace officer

PROSECUTION TO BE HANDLED BY:

Melissa Palepu (P74121)

Criminal Trials & Appeals Division
3030 W. Grand Blvd., Suite 10-300
Detroit, MI 48202
313-456-0180

AG CASE
23060160

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT	COMPLAINT FELONY	DISTRICT: CIRCUIT: CTN: 96-23901202-01 MSP #:
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District Court ORI: MI820365J	Circuit Court ORI: MI821095J	AG ORI: MI820025A
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THE PEOPLE OF THE STATE OF MICHIGAN	Defendant's name and address v DAVID RONALD HOLMAN [REDACTED]	Victim or complainant CITY OF DETROIT
		Complaining Witness S/A WILLIE SMITH

Co-defendant(s) (If known)	Date: On or about 07/01/2017 THRU 12/31/2019
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City/Twp./Village DETROIT	County in Michigan WAYNE	Defendant TCN	Defendant CTN 96-23901202-01	Defendant SID	
Defendant DOB Put DOB in Ref. No. row 1 on MC 97	Defendant DLN Put DLN in Ref. No. row 3 on MC 97	DLN Type:	Vehicle Type	Defendant Sex M	Defendant Race W
Police agency report no. 2023-0386918-A	Charge See below			Maximum penalty See below	

[] A sample for chemical testing for DNA identification profiling is on file with the Michigan State Police from a previous case.

STATE OF MICHIGAN COUNTY OF WAYNE

The complaining witness says that on the date and at City of Detroit, the defendant, contrary to law,
COUNT 1: CRIMINAL ENTERPRISES - CONDUCTING
 being a person employed by or associated with an enterprise, to wit: Den-Man Contractors, Inc., did knowingly conduct or participate in the affairs of the enterprise directly or indirectly through a pattern of racketeering activity, consisting of two or more of the following incidents of racketeering, to wit:

From 01/2018 to 12/2018, in at approximately 54 various locations, defendant committed the following offense for financial to wit: in violation of MCL 750.218(7)(a) obtained financial gain by committing False Pretenses - \$100,000 or More, upon the Detroit Land Bank Authority and/or Detroit Building Authority by using improper backfill material for HHF Demolition Contracts from 2018 for approximately 54 residential locations and then misrepresented where the backfill material was sourced, resulting in a harm of approximately \$216,000.00 (Reference Count 2.);

From 01/2018 to 12/2018, at approximately 116 various locations within the City of Detroit, defendant committed the following offense for financial gain to wit: in violation of MCL 750.218(7)(a) obtained financial gain by committing False Pretenses - \$100,000 or More, upon the Detroit Land Bank Authority and/or Detroit Building Authority by using improper backfill material for Non-HHF Demolition Contracts from 2018 for approximately 116 residential locations and then misrepresented where the backfill material was sourced resulting in a harm of approximately \$464,000.00 (Reference Count 3.),

From 01/2018 to 12/2018, for various locations within the City of Detroit, defendant committed the following offense for financial gain to wit: in violation of MCL 750.218(7)(a) obtained financial gain by committing False Pretenses - \$100,000 or More, upon the Detroit Land Bank Authority and/or Detroit Building Authority by improperly invoicing for backfill material on HHF Demolition contracts for 2018 and thus receiving approximately \$144,578.00. (Reference Count 4.),

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From 07/2017 to 12/2017, at approximately 18 various locations within the City of Detroit, defendant committed the following offense for financial gain, to wit: in violation of MCL 750.218(6)(a), obtained financial gain by committing False Pretenses - \$50,000 to \$100,000, upon the Detroit Land Bank Authority and/or Detroit Building Authority, by using improper backfill material for HHF Demolition Contracts from 2017 for approximately 18 residential locations and then misrepresented where the backfill material was sourced resulting in a harm of approximately \$72,000.00 (Reference Count 6.),

From 07/2017 to 12/2017, at approximately 16 various locations within the City of Detroit, defendant committed the following offense for financial gain, to wit: in violation of MCL 750.218(6)(a) obtained financial gain by committing False Pretenses - \$50,000 to \$100,000, upon the Detroit Land Bank Authority and/or Detroit Building Authority by using improper backfill material for Non-HHF Demolition Contracts from 2017 for approximately 16 residential locations and then misrepresented where the backfill material was sourced resulting in a harm of approximately \$64,000.00 (Reference Count 7.),

From 07/2017 to 12/2017, at various locations within the City of Detroit, defendant committed the following offense for financial gain, to wit: in violation of MCL 750.218(4)(a) obtained financial gain by committing False Pretenses - \$1,000 or more but less than \$20,000, upon the Detroit Land Bank Authority and/or Detroit Building Authority by improperly invoicing for backfill material on HHF Demolition contracts for 2017 and thus receiving approximately \$7,954.34.(Reference Count 8.)

From 01/2019 to 12/2019, at 8088 Roselawn in the City of Detroit, defendant committed the following offense for financial gain, to wit: in violation of MCL 750.218(4)(a), obtained financial gain by committing False Pretenses - \$1,000 or more but less than \$20,000, upon the Detroit Land Bank Authority and/or Detroit Building Authority by improperly invoicing for backfill material on HHF Demolition contracts for 2019 and thus receiving approximately \$2,540.00 (Reference Count 9.),

From 07/2017 to 12/2017, at various locations within the City of Detroit, defendant committed the following offense for financial gain, to wit: in violation of MCL 750.218(4)(a) obtained financial gain by committing False Pretenses \$1,000 or more but less than \$20,000, upon the Detroit Land Bank Authority and/or Detroit Building Authority by improperly invoicing for backfill material on Non-HHF Demolition contracts for 2017 and thus receiving approximately \$15,813.50 (Reference Count 10.),

From 01/2018 to 12/2018, at various locations within the City of Detroit, defendant committed the following offense for financial gain, to wit: in violation of MCL 750.218(4)(a) obtained financial gain by committing False Pretenses \$1,000 or more but less than \$20,000, upon the Detroit Land Bank Authority and/or Detroit Building Authority by improperly invoicing for backfill material on Non-HHF Commercial Demolition contracts for 2018 and thus receiving approximately \$10,368.50 (Reference Count 11.).,

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which had the same or a substantially similar purpose, participant(s), victims or method of commission, and which amount to or pose a threat of continued criminal activity; contrary to MCL 750.159i(1). [750.159I1]

NOTICE: Pursuant to MCL 750.159j(5), the following property was used in the course of, intended for use in the course of, derived from or realized through the racketeering conduct alleged herein, and upon conviction under MCL 750.159i, is subject to criminal forfeiture:

- (1) Real and Personal Property located at 4321 Blood Road, Metamora Township, MI with a legal description of Sec 15 T06N R10E The NE-NW-SW-SE of the SW QTR.

FELONY: 20 Years and/or \$100,000.00; criminal forfeiture of proceeds, substituted proceeds, and instrumentalities of racketeering listed on attached notification (see MCL 750.159j(4)); court may order court costs, costs of investigation, and/or costs of prosecution

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].

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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].

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COUNT 5: FALSE PRETENSES - \$100,000.00 OR MORE

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COUNT 6: FALSE PRETENSES - \$50,000.00 OR MORE BUT LESS THAN \$100,000.00

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 \$72,000.00; contrary to MCL 750.218(6)(a). [750.2186A].

FELONY: 15 Years and/or \$25,000.00, 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 7: FALSE PRETENSES - \$50,000.00 OR MORE BUT LESS THAN \$100,000.00

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FELONY: 15 Years and/or \$25,000.00, 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 8: FALSE PRETENSES - \$1,000.00 OR MORE BUT LESS THAN \$20,000.00

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

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COUNT 10: 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 11: 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 12: 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).

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 the defendant be apprehended and dealt with according to law.

Warrant authorized on 11/20/2023 by:
Melissa Palepu
Date
Melissa Palepu (P74121)
Criminal Trials & Appeals Division
3030 W. Grand Blvd., Suite 10-300
Detroit, MI 48202
313-456-0180
 Security for costs posted

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.

SA Millie Smith
Complaining Witness Signature

11-27-23
Date