

STATE OF MICHIGAN 80TH JUDICIAL DISTRICT 55TH JUDICIAL CIRCUIT	COMPLAINT FELONY	DISTRICT: CIRCUIT: CTN: 96-24900561-01 MSP #: MI6397503
District Court ORI: MI260015J	Circuit Court ORI: MI260025J	AG ORI: MI820025A

Defendant's name and address THE PEOPLE OF THE STATE OF MICHIGAN v JONATHAN LAWRENCE ALLEN [REDACTED]	Victim or complainant [REDACTED]			
Co-defendant(s) (If known)	Complaining Witness SA SCOTT CRONIN			
Date: On or about 06/04/2023-07/13/2023				
City/Twp./Village Harrison	County in Michigan CLARE	Defendant TCN	Defendant CTN 96-24900561-01	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
Police agency report no. MI6397503	Charge See below	Maximum penalty See below		
<input type="checkbox"/> 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 CLARE

The complaining witness says that on the date and at Harrison, the defendant, contrary to law,

COUNT 1: CRIMINAL ENTERPRISES - CONDUCTING

being a person employed by or associated with an enterprise, to wit: Rental Fraud Ring, 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:

on or about June 4, 2023, in Harrison, MI, defendant did commit and/or & conspire to commit the following offense for financial gain by obtaining money, property or any thing of value, to wit: FALSE PRETENSES- \$20,000 OR MORE BUT LESS THAN \$50,000, MCL 750.2185A;

and on or about June 27, 2023, in Harrison, MI, defendant did commit and/or conspire to commit the following offense for financial gain by obtaining money, property or any thing of value, to wit: FALSE PRETENSES- \$20,000 OR MORE BUT LESS THAN \$50,000, MCL 750.2185A,

and on or about July 13, 2023, in Harrison, MI, defendant did commit and/or conspire to commit the following offense for financial gain by obtaining money, property or any thing of value, to wit: FALSE PRETENSES- \$20,000 OR MORE BUT LESS THAN \$50,000, MCL 750.2185A,

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

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

CRIMINAL ENTERPRISES - NOTICE OF INTENT TO FORFEIT PROPERTY

Pursuant to MCL 750.159J(5):

(1) Identified proceeds, including but not limited to, currency, retail merchandise, and electronics, obtained through the organized retail crime ring or otherwise resulting from the scheme to commit retail fraud, together with any real, personal, or intangible property in which Jonathan Allen has an interest and that was used in the course of, intended for use in the course of, derived from, or realized through conduct in the scheme to commit retail fraud, including any property constituting an interest in, means of control over, or influence over the organized retail crime ring involved in said scheme and any real, personal, or intangible property constituting proceeds derived from said scheme

COUNT 2: FALSE PRETENSES - \$20,000.00 OR MORE BUT LESS THAN \$50,000.00

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 \$20,000.00 or more but less than \$50,000.00 ; contrary to MCL 750.218(5)(a). [750.2185A].

FELONY: 15 Years and/or \$15,000.00, 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. ____; 132 S. Ct. 2344 (2012) 567 U.S. ____; 132 S. Ct. 2344 (2012).

COUNT 3: FALSE PRETENSES - \$20,000.00 OR MORE BUT LESS THAN \$50,000.00

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 \$20,000.00 or more but less than \$50,000.00 ; contrary to MCL 750.218(5)(a). [750.2185A].

FELONY: 15 Years and/or \$15,000.00, 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. ____; 132 S. Ct. 2344 (2012) 567 U.S. ____; 132 S. Ct. 2344 (2012).

COUNT 4: FALSE PRETENSES - \$20,000.00 OR MORE BUT LESS THAN \$50,000.00

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 \$20,000.00 or more but less than \$50,000.00 ; contrary to MCL 750.218(5)(a). [750.2185A].

FELONY: 15 Years and/or \$15,000.00, 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. ____; 132 S. Ct. 2344 (2012) 567 U.S. ____; 132 S. Ct. 2344 (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 <u>5/22/2024</u> by: <i>Michael Friese</i> Date
Michael Friese (P75541) Assistant Attorney General Criminal Trials & Appeals Division 3030 W. Grand Boulevard Ste 10-200 Detroit, MI 48202 313-456-0180
<input type="checkbox"/> 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.

Complaining Witness Signature

Date