

STATE OF MICHIGAN 54A JUDICIAL DISTRICT 30TH JUDICIAL CIRCUIT		COMPLAINT FELONY		DISTRICT: CIRCUIT: CTN: COMPLAINT #: 2023-0382033-A	
District Court ORI: MI330075J		Circuit Court ORI: MI330055J		AG ORI: MI330025A	
THE PEOPLE OF THE STATE OF MICHIGAN		Defendant's name and address V DAVID WAYNE COKER, JR. <div style="background-color: black; width: 200px; height: 30px;"></div>		Victim or complainant COMPLETE HEALTH PARK AND MICHIGAN DEPARTMENT OF HEALTH AND HUMAN SERVICES Complaining Witness S/A JEFF CAMPBELL	
Co-defendant(s) (If known)				Date: On or about 12/19/2022-01/9/2023	
City/Twp./Village CITY OF LANSING	County in Michigan INGHAM	Defendant TCN	Defendant CTN	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: Oper./Chauf	Vehicle Type	Defendant Sex M	Defendant Race W
Police agency report no. 2023-0382033-A	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 INGHAM

The complaining witness says that on the date and location described above, the defendant, contrary to law, through a pattern of racketeering activity committed larceny by false pretenses against the Michigan Department of Health and Human Services (MDHHS) and/or the non-profit Complete Health Park (CHP) and embezzled funds from CHP. The defendant also unlawfully used or mishandled public money on the date and location described above.

In July of 2022, the Michigan State Budget for Fiscal Year 2023 (Act No. 166, Public Acts of 2022) was signed into law. The 2023 Budget included Section 1996 (Sect. 1996), a \$25,000,000.00 grant for a community health campus pilot project. The Sect. 1996 grant was an "earmark," or legislative directed funding for a local project in Clare County Michigan. The Sect. 1996 grant was assigned to MDHHS for administration.

Defendant incorporated Complete Health Park (CHP), a domestic non-profit corporation, on June 2, 2022. Defendant was listed in documents as the "Director and Sole Member" of CHP. CHP's Sect. 1996 grant proposal was submitted to MDHHS on 10/10/2022—no other non-profit corporations submitted proposals. The first CHP Board of Directors' (CHP Board) meeting was held on 10/30/2022 - defendant was present. On 10/30/2022, the CHP Board gave defendant authorization to open bank accounts and/or engage in financial transactions for CHP. On 11/2/2022, the CHP Board voted to approve a contract with the "independent contractor" IW Consulting, LLC (IWC) to manage CHP. Defendant was the owner/registered agent for IWC. Defendant used this business entity to bill CHP for purported consulting and project management services.

CHP's contract agreement with IWC provided compensation for "project management fees" in the amount of 7% of the total project costs for the project and provided hourly compensation for "consulting services and project management fees" of \$200/hour. The Grant Agreement signed by the defendant capped the salary amount that one person can be paid as part of the project to approximately \$212,100.

The Grant Agreement was signed by defendant and MDHHS on 12/15/2022. Defendant was MDHHS' contact person for the project and the CHP representative who handled the distribution of the Sect. 1996 grant money to CHP. Defendant did not disclose to MDHHS that he was the owner/registered agent for IWC or that he would receive any payment from the project through IWC. The "Conflict of Interest and Code of Conduct" section of the grant agreement signed by the defendant and MDHHS required that the grantee abide by and be subject to provisions of 1968 PA 317 ("Contracts of Public Servants with Public Entities Act), as amended, and 2 CFR 200.318 (c)(1). The grant agreement specifically prohibited holding or acquiring an interest that would conflict with the agreement and doing anything that creates the appearance of impropriety with respect to the award of performance of this agreement. This section also references 1973 PA 196 (Michigan State Ethics Act), as amended, which states in relevant part: "(7) Except as provided in section 2a, a public officer or employee shall not participate in the negotiation or execution of contracts, making of loans, granting of subsidies, fixing of rates, issuance of permits or certificates, or other regulation or supervision relating to a business entity in which the public officer or employee has a financial or personal interest. MCL 15.342(7)."

The defendant submitted a Financial Status Report (FSR) dated 12/19/2022 to MDHHS for the time period 12/1/2022 through 12/31/2022 that included invoices showing two transactions between IW Consulting (IWC) and Complete Health Park (CHP): 1) an invoice dated "December-5-2023" for \$182,200.00 from IWC to CHP and 2) an invoice dated "December-31-2023" for \$638,432.00 from IWC to CHP. The defendant did not disclose his role in IWC to MDHHS prior to or at the time of the FSR's submission, thereby defrauding MDHHS. MDHHS relied on this non-disclosure to disburse grant funds.

The defendant defrauded CHP by submitting the two fraudulent invoices for \$182,200.00 and \$638,432.00 for the period 12/1/2022 through 12/31/2022, knowing he did not and could not have performed consulting work amounting to either expense. The defendant approved the invoices/payment to his own company, doing so on the day the FSR was submitted.

On 1/9/23, CHP received the first installment of the funds allocated for the community health park project, in the amount of \$9,941,089.16 from the State of Michigan. Immediately following this deposit into CHP's bank account, defendant wired \$820,632.00 from CHP's account to IWC's account. Following this transaction, Defendant transferred hundreds of thousands of dollars into his personal bank accounts, and the defendant used the money to purchase personal possessions including vehicles, firearm accessories, and precious metals, among other things. Defendant used his position as an agent of CHP to convert money belonging to CHP to his own use, enriching himself at CHP's expense.

COUNT 1: CRIMINAL ENTERPRISES - ACQUIRE/MAINTAIN

did knowingly acquire or maintain an interest in or control of IW Consulting, a limited liability company organized in the State of Michigan, and/or an organization, association, other legal entity, or a group of persons associated in fact, and did so directly or indirectly through a pattern of racketeering activity, consisting of two or more of the following incidents of racketeering, to wit:

1. On or about December 19, 2022, in Ingham, Michigan, defendant did commit and/or aid or abet in the commission of the following offense for financial gain, to wit: did with the intent to defraud or cheat, make or use a false pretense, to wit: the defendant submitted a Financial Status Report (FSR) dated 12/19/2022 to MDHHS that included invoices showing two transactions between IW Consulting and Complete Health Park: 1) an invoice dated "December-5-2023" for \$182,200 from IW Consulting to Complete Health Park and 2) an invoice dated "December-31-2023" for \$638,432 from IW Consulting to Complete Health Park. The defendant approved both invoices on 12/19/2022 but did not disclose his role in IW Consulting to MDHHS prior to, or at the time of the FSR's submission. The defendant used this 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 or more; contrary to MCL 750.218(7)(a). [MCL 750.2187A]
2. And on or about December 19, 2022, in Ingham County, Michigan, the defendant did commit and/or aid or abet in the commission of the following offense for financial gain, to wit: did, with the intent to defraud or cheat, make or use a false pretense, to wit: the defendant submitted an invoice dated "December-5-2023" for \$182,200 from IW Consulting to Complete Health Park, while knowing or having reason to know that IW Consulting had not done \$182,200 worth of services 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 or more; contrary to MCL 750.218(7)(a). [MCL 750.2187A]
3. And on or about December 19, 2022, in Ingham County, Michigan the defendant did commit and/or aid or abet in the commission of the following offense for financial gain, to wit: did, with the intent to defraud or cheat, make or use a false pretense, to wit: the defendant submitted an invoice dated invoice dated "December-31-2023" for \$638,432 from IW Consulting to Complete Health Park while knowing or having reason to know that IW Consulting had not done \$638,432 worth of services 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 or more; contrary to MCL 750.218(7)(a). [MCL 750.2187A]
4. And on or about January 9, 2023, in Ingham County, Michigan, the defendant did commit and/or aid or abet in the commission of the following offense for financial gain, to wit: being an agent, servant, or employee of Complete Health Park, the defendant did convert to his own use, without the consent of his principal, \$182,200, money belonging to his principal, having a value of \$100,000 or more, that came into his possession or under his charge or control by virtue of his relationship with the principal; contrary to MCL 750.174(4).[MCL 750.1744]

5. And on or about January 9, 2023, in Ingham County, Michigan, the defendant did commit and/or aid or abet in the commission of the following offense for financial gain, to wit: being an agent, servant, or employee of Complete Health Park, the defendant did convert to his own use, without the consent of his principal, \$638,432, money belonging to his principal, having a value of \$100,000 or more, that came into his possession or under his charge or control by virtue of his relationship with the principal; contrary to MCL 750.174(4). [MCL 750.1744] which had the same or a substantially similar purpose, result, participant, victim, and method of commission, and which amount to or pose a threat of continued criminal activity; contrary to MCL 750.159i(1)(2). [750.159I2] 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), 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. Vehicles owned by or registered to David Coker, specifically including:
 - a. 2023 Honda ORV, VIN #####00109
 - b. 2015 Buick Lacrosse, VIN #####32210
 - c. 2016 Ram 3500, VIN #####3885
 - d. 2024 Chevrolet Trax, VIN #####3582
2. Coins and precious metals purchased from Kaps Koins on 1/18/23, including:
 - a. (1) 10oz silver bar (Engelhard)
 - b. (1) 10oz silver bar (Engelhard poured)
 - c. (1) 100oz silver bar
 - d. (60) 1oz silver rounds
 - e. (1) 1/10oz proof American Gold Eagle
 - f. (3) 1oz platinum bars
 - g. (2) 50oz silver bars
 - h. (5) 1/10oz RCM gold bars
3. Items purchased from JM Bullion on 1/17/23, including:
 - a. (1) 2020 1 oz American Gold Buffalo Coin (SKU GCAB120)
 - b. (1) 2021 1 oz American Gold Buffalo Coin (BU) (SKU GCAB121)
 - c. (1) 2022 1 oz American Platinum Eagle Coin (BU) (SKU PCAE122)
 - d. (1) 100 oz SilverTowne Pony Silver Bar (New) (SKU SBSTPONY100)
 - e. (50) 1 oz American Silver Eagle Coin (Random Year) (SKU SCASEZ01VAR)
 - f. (1) 1 oz Silver Bullet (.45 Caliber, New) (SKU SSTBLT1)
 - g. (1) 2 oz Silver Bullet (.308 Caliber, New) (SKU SSTBLT2)
 - h. (1) 5 oz Silver Bullet (12 Gauge, New) SKU (SSTBLT5)
4. Items purchased by David Coker from Sig Sauer on 1/16/23, including:
 - a. Sierra6bdx rifle scope, 5-30x56mm, 34mm, SFP, BDX-R2 digital ballistic reticle, 0.25 MOA, black in color, SKU #SOSBDX65111
 - b. Bravo Battle Pack - bravo4 4x32mm, horseshoe dot illum reticle, 0.5 moa adj, Romeo zero, 3 MOA, black in color, SKU #sob44005 556-762
 - c. ECH03 thermal reflex sight, 2-12X, M1913, SKU # SOEC32001
 - d. Bravo5 battle sight, 5x32mm, 556-762 horseshoe dot illum reticle, 0.5 moa adj, black, SKU # SOB53101
5. U.S. Currency in the possession of David Wayne Coker Jr. or found at the location or vehicles listed.
6. The balance and securities of any/all Horizon accounts as well as any safety deposit boxes associated with any and all individual accounts for David Wayne Coker, Jr, joint accounts for David and Sarah Coker, Complete Health Park business account, and IW Consulting LLC business and checking accounts including:
 - a. Complete Health Park business account ending in 7376
 - b. IW Consulting LLC business account ending in 8142
 - c. IW Consulting LLC business checking account ending in 8155
 - d. David and Sarah Coker personal account ending in 8168

7. The balance and securities of any/all Michigan State University Federal Credit Union (MSUFCU) accounts as well as any safety deposit boxes associated with any and all individual accounts for David Wayne Coker, Jr, joint accounts for David Wayne Coker, Jr. and Sarah Coker, and IW Consulting LLC business and checking accounts including:
 - a. David and Sarah Coker personal account ending in 5033
 - b. David and Sarah Coker personal account ending in 8835
 - c. IW Consulting, LLC business account ending in 6394
8. Any additional items or accounts that become known during the course of investigation and/or search and/or arrest regarding the listed location and individual.

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

did with the intent to defraud or cheat, make or use a false pretense to wit: the defendant submitted a Financial Status Report (FSR) dated 12/19/2022 to MDHHS that included invoices showing two transactions between IW Consulting and Complete Health Park: 1) an invoice dated "December-5-2023" for \$182,200 from IW Consulting to Complete Health Park and 2) an invoice dated "December-31-2023" for \$638,432 from IW Consulting to Complete Health Park. Defendant did not disclose his role in IW Consulting to MDHHS prior to, or at the time of the FSR's submission. The defendant used this 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 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

did with the intent to defraud or cheat, make or use a false pretense, to wit: the defendant submitted an invoice dated "December-5-2023" for \$182,200 from IW Consulting to Complete Health Park, while knowing or having reason to know that IW Consulting had not done \$182,200 worth of services 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 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

did with the intent to defraud or cheat, make or use a false pretense, to wit: did, with the intent to defraud or cheat, make or use a false pretense, to wit: the defendant submitted an invoice dated "December-31-2023" for \$638,432 from IW Consulting to Complete Health Park, while knowing or having reason to know that IW Consulting had not done \$638,432 worth of services 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 or more; contrary to MCL 750.218(7)(a). [750.2187A].

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 5: EMBEZZLEMENT - \$100,000.00 OR MORE

being an agent, servant, or employee of Complete Health Park, did convert to his own use, without the consent of his principal, \$182,200, money belonging to his principal, having a value of \$100,000 or more, that came into his possession or under his charge or control by virtue of his relationship with the principal; contrary to MCL 750.174(7). [750.1747]

FELONY: 20 Years and/or a fine up to \$50,000.00, or 3 times the amount embezzled, whichever is greater. A consecutive sentence may be imposed for any other conviction if the embezzlement victim was a non-profit, a person 60 years of age or older, or a vulnerable adult. 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: EMBEZZLEMENT - \$100,000.00 OR MORE

being an agent, servant, or employee of Complete Health Park, did convert to his own use, without the consent of his principal, \$638,432, money belonging to his principal, having a value of \$100,000 or more, that came into his possession or under his charge or control by virtue of his relationship with the principal; contrary to MCL 750.174(7). [750.1747]

FELONY: 20 Years and/or a fine up to \$50,000.00, or 3 times the amount embezzled, whichever is greater. A consecutive sentence may be imposed for any other conviction if the embezzlement victim was a non-profit, a person 60 years of age or older, or a vulnerable adult. 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).

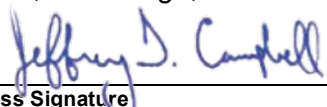
COUNT 7: PUBLIC MONEY - SAFE KEEPING

did commingle public moneys with his own; and/or under a pretext, use, or allowed to be used public moneys for a purpose other than that allowed by the December 2022 Grant Agreement; and/or willfully or corruptly draw or issue a warrant, order, or certificate for the payment of public money in excess of the amount authorized by the Grant Agreement or for a purpose not authorized by the Grant Agreement; contrary to MCL 750.490. [750.490]

HIGH COURT MISDEMEANOR: 2 Years 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 the defendant be apprehended and dealt with according to law.

Warrant authorized on <u>05/09/2025</u> by: _____ Date	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.
Kelli Megyesi (P66349) Assistant Attorney General Financial Crimes Division 3030 W Grand Blvd, 10th Floor Detroit, MI 48202 (313) 456-3885 <input type="checkbox"/> Security for costs posted	 _____ Complaining Witness Signature 5/9/25 _____ Date