

<b>STATE OF MICHIGAN</b> <b>47TH JUDICIAL DISTRICT</b> <b>6TH JUDICIAL CIRCUIT</b>	<b>COMPLAINT</b> <b>FELONY</b>	<b>DISTRICT: 2626400618</b> <b>CIRCUIT:</b> <b>CTN: [REDACTED]</b> <b>COMPLAINT #: 2024-0400618-A</b>
District Court ORI: MI630055J	Circuit Court ORI: MI630015J	AG ORI: MI330025A

<b>THE PEOPLE OF THE STATE OF MICHIGAN</b>	Defendant's name and address V <b>FAY BEYDOUN</b> [REDACTED]	Victim or complainant <b>Global Link International</b>
Co-defendant(s) (If known)		Complaining Witness <b>S/A KYLE KOLKA</b>
City/Twp./Village <b>FARMINGTON HILLS</b>		Date: On or about <b>4/1/2023-1/1/2025</b>
Defendant DOB Put DOB in Ref. No. row 1 on MC 97	County in Michigan <b>OAKLAND</b>	Defendant TCN [REDACTED]
Defendant DLN Put DLN in Ref. No. row 3 on MC 97	Defendant CTN [REDACTED]	Defendant SID [REDACTED]
Police agency report no. <b>2024-0400618-A</b>	DLN Type: [REDACTED]	Vehicle Type [REDACTED]
Charge <b>See below</b>	Defendant Sex <b>F</b>	Defendant Race [REDACTED]
Maximum penalty <b>See below</b>	<input type="checkbox"/> A sample for chemical testing for DNA identification profiling is on file with the Michigan State Police from a previous case.	

Witnesses  
**S/A Kyle Kolka**

**STATE OF MICHIGAN COUNTY OF OAKLAND**

The complaining witness says that on or between April 1, 2023, and January 1, 2025, and in the county of Oakland, State of Michigan, the defendant, contrary to law,

**COUNT 1: CRIMINAL ENTERPRISES - CONDUCTING**

being a person employed by or associated with an enterprise, to wit: Ayman Beydoun, the board of directors for Global Link International, LLC, and/or W. Chaz Murray and/or Rhonda Faycurry and/or another organization, association, other legal entity, or a group of persons associated in fact, 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:

Predicate 1, on or about January 1, 2024 to May 24, 2024, in Oakland County, Michigan, defendant did commit the following offense for financial gain by obtaining money, property or any thing of value, to wit: did, being a person to whom money had been delivered, embezzle or fraudulently convert to his/her own use that property, which belonged to Global Link International, the value of the property was \$1,000.00 or more but less than \$20,000.00; contrary to MCL 750.362. [750.3622A];

Predicate 2, on or about July 1, 2023 to December 31, 2023, in Oakland County, Michigan, defendant did commit the following offense for financial gain by obtaining money, property or any thing of value, to wit: did, being a person to whom money had been delivered, embezzle or fraudulently convert to his/her own use that property, which belonged to Global Link International, the value of the property was \$1,000.00 or more but less than \$20,000.00; contrary to MCL 750.362. [750.3623A],

Predicate 3, on or about August 1, 2023 to December 31, 2023, in Oakland County, Michigan, defendant did commit the following offense for financial gain by obtaining money, property or any thing of value, to wit: did, being a person to whom money had been delivered, embezzle or fraudulently convert to his/her own use that property, which belonged to Global Link International, the value of the property was \$1,000.00 or more but less than \$20,000.00 ; contrary to MCL 750.362. [750.3623A],

Predicate 4, on or about June 1, 2023 to December 31, 2023, in Oakland County, Michigan, defendant did commit the following offense for financial gain by obtaining money, property or any thing of value, to wit: did, being a person to whom money had been delivered, embezzle or fraudulently convert to his/her own use that property, which belonged to Global Link International, the value of the property was \$1,000.00 or more but less than \$20,000.00; contrary to MCL 750.362. [750.3623A],

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Predicate 5, on or about August 1, 2023 to December 31, 2023, in Oakland County, Michigan, defendant did commit the following offense for financial gain by obtaining money, property or any thing of value, to wit: did, being a person to whom money had been delivered, embezzle or fraudulently convert to his/her own use that property, which belonged to Global Link International, the value of the property was \$1,000.00 or more but less than \$20,000.00; contrary to MCL 750.362. [750.3623A],

Predicate 6, on or about July 1, 2023 to December 31, 2023, in Oakland County, Michigan, defendant did commit the following offense for financial gain by obtaining money, property or any thing of value, to wit: did, being a person to whom money had been delivered, embezzle or fraudulently convert to his/her own use that property, which belonged to Global Link International, the value of the property was \$1,000.00 or more but less than \$20,000.00; contrary to MCL 750.362. [750.3623A],

Predicate 7, on or about July 1, 2023 to December 31, 2023, in Oakland County, Michigan, defendant did commit the following offense for financial gain by obtaining money, property or any thing of value, to wit: did, being a person to whom money had been delivered, embezzle or fraudulently convert to his/her own use that property, which belonged to Global Link International, the value of the property was \$1,000.00 or more but less than \$20,000.00; contrary to MCL 750.362. [750.3623A],

which had the same or a substantially similar victim, 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

**COUNT 2: FORGERY**

on or about April 1, 2024 to May 24, 2024, in Oakland County, Michigan, defendant did commit the following offense: did falsely make, alter, forge or counterfeit an invoice for legal services submitted to Michigan Economic Development Corporation to justify a fraudulent expense, with intent to injure or defraud, to-wit: defendant submitted an invoice for legal services in order to pay her personal legal expenses using Global Link International funds; contrary to MCL 750.248. [750.248]

FELONY: 14 Years

**COUNT 3: UTTERING AND PUBLISHING**

on or about April 1, 2024 to May 24, 2024, in Oakland County, Michigan, defendant did commit the following offense: did utter and publish as true, a certain false, forged, altered or counterfeit public record, with intent to injure or defraud, knowing said instrument to be false, altered, forged or counterfeit, said instrument more fully described as follows: a forged invoice for legal services, submitted to Michigan Economic Development Corporation to justify a \$11,325 expense; contrary to MCL 750.249. [750.249]

FELONY: 14 Years

**COUNT 4: LARCENY BY CONVERSION - \$1,000.00 OR MORE BUT LESS THAN \$20,000.00**

on or about January 1, 2024 to May 24, 2024, in Oakland County, Michigan, defendant did commit the following offense: did, being a person to whom money had been delivered, embezzle or fraudulently convert to his/her own use that property, which belonged to Global Link International, the value of the property was \$1,000.00 or more but less than \$20,000.00 (\$11,325 – Epic Law invoice); contrary to MCL 750.362. [750.3623A]

FELONY: 5 Years and/or \$10,000.00, or 3 times the value of the property stolen, whichever is greater (see MCL 750.356(3)(a)). 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).

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**COUNT 10: UTTERING AND PUBLISHING**

on or about June 1, 2023 to December 31, 2023, in Oakland County, Michigan, defendant did commit the following offense: did utter and publish as true, a certain false, forged, altered or counterfeit public record, with intent to injure or defraud, knowing said instrument to be false, altered, forged or counterfeit, said instrument more fully described as follows: a false description for a political dinner held at defendant's home submitted to Michigan Economic Development Corporation to justify a \$1,870 expense; contrary to MCL 750.249. [750.249]

FELONY: 14 Years

**COUNT 11: LARCENY BY CONVERSION - \$1,000.00 OR MORE BUT LESS THAN \$20,000.00**

on or about August 1, 2023 to December 31, 2023, in Oakland County, Michigan, defendant did commit the following offense: did, being a person to whom money had been delivered, embezzle or fraudulently convert to his/her own use that property, which belonged to Global Link International, the value of the property was \$1,000.00 or more but less than \$20,000.00 [\$1,535 for 8/14/23]; contrary to MCL 750.362. [750.3623A]

FELONY: 5 Years and/or \$10,000.00, or 3 times the value of the property stolen, whichever is greater (see MCL 750.356(3)(a)). 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 12: UTTERING AND PUBLISHING**

on or about August 1, 2023 to December 31, 2023, in Oakland County, Michigan, defendant did commit the following offense: did utter and publish as true, a certain false, forged, altered or counterfeit public record, with intent to injure or defraud, knowing said instrument to be false, altered, forged or counterfeit, said instrument more fully described as follows: a false description for a political dinner held at defendant's home submitted to Michigan Economic Development Corporation to justify a \$1,535 expense; contrary to MCL 750.249. [750.249]

FELONY: 14 Years

**COUNT 13: LARCENY BY CONVERSION - \$1,000.00 OR MORE BUT LESS THAN \$20,000.00**

on or about July 1, 2023 to December 31, 2023, in Oakland County, Michigan, defendant did commit the following offense: did, being a person to whom money had been delivered, embezzle or fraudulently convert to his/her own use that property, which belonged to Global Link International, the value of the property was \$1,000.00 or more but less than \$20,000.00 [\$5,557 to Royce Lighting]; contrary to MCL 750.362. [750.3623A]

FELONY: 5 Years and/or \$10,000.00, or 3 times the value of the property stolen, whichever is greater (see MCL 750.356(3)(a)). 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 14: LARCENY BY CONVERSION - \$1,000.00 OR MORE BUT LESS THAN \$20,000.00**

on or about July 1, 2023 to December 31, 2023, in Oakland County, Michigan, defendant did commit the following offense: did, being a person to whom money had been delivered, embezzle or fraudulently convert to his/her own use that property, which belonged to Global Link International, the value of the property was \$1,000.00 or more but less than \$20,000.00 [\$1,483.36 for Great Lakes Ace Hardware]; contrary to MCL 750.362. [750.3623A]

FELONY: 5 Years and/or \$10,000.00, or 3 times the value of the property stolen, whichever is greater (see MCL 750.356(3)(a)). 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).

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**COUNT 15: UTTERING AND PUBLISHING**

on or about January 1, 2024 to January 1, 2025, in Oakland County, Michigan, defendant did commit the following offense: did utter and publish as true, a certain false, forged, altered or counterfeit public record, with intent to injure or defraud, knowing said instrument to be false, altered, forged or counterfeit, said instrument more fully described as follows: an expense report required by law to be submitted to Michigan Economic Development Corporation with false descriptions of Global Link International activity in order to induce continued salary payments; contrary to MCL 750.249. [750.249]

FELONY: 14 Years

**COUNT 16: UTTERING AND PUBLISHING**

on or about January 1, 2024 to January 1, 2025, in Oakland County, Michigan, defendant did commit the following offense: did utter and publish as true, a certain false, forged, altered or counterfeit public record, with intent to injure or defraud, knowing said instrument to be false, altered, forged or counterfeit, said instrument more fully described as follows: an expense report required by law to be submitted to Michigan Economic Development Corporation with false descriptions of Global Link International activity in order to induce continued salary payments; contrary to MCL 750.249. [750.249]

FELONY: 14 Years

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>5-4-26</u> by: _____ Date
Matthew K. Payok (P64776) Assistant Attorney General Financial Crimes Division PO Box 30755 Lansing, MI 48909 (517) 335-7560 <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.

[Signature]  
Complaining Witness Signature

5/4/26  
Date

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