

Copy

AG CASE

STATE OF MICHIGAN
53H JUDICIAL DISTRICT
44th JUDICIAL CIRCUIT

COMPLAINT FELONY

DISTRICT:
CIRCUIT: 18-0727FY

District Court ORI: MI470025J
THE JUDICIAL CENTER HOWELL, MI 48843 517-548-1000

Circuit Court ORI: MI470015J
The Judicial Center, Howell, MI 48843 517-546-9816

AG ORI:
MI820025A

THE PEOPLE OF THE STATE OF MICHIGAN
v

TIMOTHY RAY GREENE 96-18900354-01
JOHN FREDERICK GREENE 96-18900354-02
ROBERT J. GREENE 96-18900354-03

DOB:
09/01/1970
09/23/1974
04/22/1943

Victim or complainant: STATE OF MICHIGAN	Complaining Witness S/A PETER ACKERLY	Date: On or about 12/01/2014 - 12/31/2015
City/Twp./Village HAMBURG TOWNSHIP	County in Michigan Livingston	
Charge(s) See Below		Maximum Penalty See Below

STATE OF MICHIGAN, COUNTY OF LIVINGSTON

The complaining witness says that on the above date range and in Hamburg Township, MI, the defendants, contrary to law,

COUNT 1 DEFENDANT (01): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, or other writing, with intent to injure or defraud, knowing said instrument to be false, altered, forged or counterfeit, said instrument more fully described as follows:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 01/05/2015, stating VIN 1GKEV23788J156356 for applicant/owner Big 3 Auto Sales of Detroit, MI.

contrary to MCL 750.249. [750.249]
FELONY: 14 Years

COUNT 2 DEFENDANT (01): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, or other writing, with intent to injure or defraud, knowing said instrument to be false, altered, forged or counterfeit, said instrument more fully described as follows:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 01/05/2015, stating VIN 2G1WW12E649247678 for applicant/owner EZ Used Auto Parts of Detroit, MI.

contrary to MCL 750.249. [750.249]
FELONY: 14 Years

COUNT 3 DEFENDANT (01): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, or other writing, with intent to injure or defraud, knowing said instrument to be false, altered, forged or counterfeit, said instrument more fully described as follows:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance

enter Warrant

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53rd DIST COURT
HOWELL, MI 48843
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of good State of Michigan motor vehicle titles, on or about the indicated dates: 01/05/2015, stating VIN 2G1WT58K379271518 for applicant/owner EZ Used Auto Parts of Detroit, MI..

contrary to MCL 750.249. [750.249]
FELONY: 14 Years

COUNT 4 DEFENDANT (01): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, or other writing, with intent to injure or defraud, knowing said instrument to be false, altered, forged or counterfeit, said instrument more fully described as follows:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 01/05/2015, stating VIN 2G1WC581X69218840 for applicant/owner EZ Used Auto Parts of Detroit, MI..

contrary to MCL 750.249. [750.249]
FELONY: 14 Years

COUNT 5 DEFENDANT (01): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, or other writing, with intent to injure or defraud, knowing said instrument to be false, altered, forged or counterfeit, said instrument more fully described as follows:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 01/12/2015, stating VIN 2C3LA53G08H319670 for applicant/owner Bud's Auto Inc. of Detroit, MI.

contrary to MCL 750.249. [750.249]
FELONY: 14 Years

COUNT 6 DEFENDANT (01): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, or other writing, with intent to injure or defraud, knowing said instrument to be false, altered, forged or counterfeit, said instrument more fully described as follows:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 01/12/2015, stating VIN 2A4RR5D10AR278251 for applicant/owner Bud's Auto Inc. of Detroit, MI.

contrary to MCL 750.249. [750.249]
FELONY: 14 Years

COUNT 7 DEFENDANT (02): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, or other writing, with intent to injure or defraud, knowing said instrument to be false, altered, forged or counterfeit, said instrument more fully described as follows:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 07/01/2015, stating VIN

1G1ZB5E15BF343721 for applicant/owner Greenlight Auto Sales of Detroit, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

COUNT 8 DEFENDANT (02): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, or other writing, with intent to injure or defraud, knowing said instrument to be false, altered, forged or counterfeit, said instrument more fully described as follows:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 07/01/2015, stating VIN 1G2ZG558X64292339 for applicant/owner Greenlight Auto Sales of Detroit, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

COUNT 9 DEFENDANT (02): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, or other writing, with intent to injure or defraud, knowing said instrument to be false, altered, forged or counterfeit, said instrument more fully described as follows:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 07/01/2015, stating VIN 1N4AA5AP1CC863070 for applicant/owner Greenlight Auto Sales of Detroit, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

COUNT 10 DEFENDANT (02): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, or other writing, with intent to injure or defraud, knowing said instrument to be false, altered, forged or counterfeit, said instrument more fully described as follows:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 07/01/2015, stating VIN 2G1WT57K091172366 for applicant/owner Zaks Auto Inc. of Detroit, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

COUNT 11 DEFENDANT (02): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, or other writing, with intent to injure or defraud, knowing said instrument to be false, altered, forged or counterfeit, said instrument more fully described as follows:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 07/01/2015, stating VIN 2G1WU57MX91303690 for applicant/owner Zaks Auto Inc. of Detroit, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

COUNT 12 DEFENDANT (02): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, or other writing, with intent to injure or defraud, knowing said instrument to be false, altered, forged or counterfeit, said instrument more fully described as follows:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 07/01/2015, stating VIN 2G4WB52K1W1439717 for applicant/owner Zaks Auto Inc. of Detroit, MI.

contrary to MCL 750.249. [750.249]
FELONY: 14 Years

COUNT 13 DEFENDANT (02): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, or other writing, with intent to injure or defraud, knowing said instrument to be false, altered, forged or counterfeit, said instrument more fully described as follows:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 07/01/2015, stating VIN 1G2ZH358064266284 for applicant/owner Metro Auto Sales of Detroit, MI.

contrary to MCL 750.249. [750.249]
FELONY: 14 Years

COUNT 14 DEFENDANT (03): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, or other writing, with intent to injure or defraud, knowing said instrument to be false, altered, forged or counterfeit, said instrument more fully described as follows:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 01/19/2015, stating VIN 1FAHP35N18W270583 for applicant/owner Metro Auto Sales of Detroit, MI.

contrary to MCL 750.249. [750.249]
FELONY: 14 Years

COUNT 15 DEFENDANT (03): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, or other writing, with intent to injure or defraud, knowing said instrument to be false, altered, forged or counterfeit, said instrument more fully described as follows:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 01/19/2015, stating VIN 2CNDL037286309470 for applicant/owner Metro Auto Sales of Detroit, MI.

contrary to MCL 750.249. [750.249]
FELONY: 14 Years

COUNT 16 DEFENDANT (03): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, or other writing, with intent to injure or defraud, knowing said instrument to be false, altered, forged or counterfeit, said instrument more fully described as follows:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 01/19/2015, stating VIN 1C3CC4FBXAN103049 for applicant/owner Hende Auto Parts of Detroit, MI.

contrary to MCL 750.249. [750.249]
FELONY: 14 Years

COUNT 17 DEFENDANT (03): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, or other writing, with intent to injure or defraud, knowing said instrument to be false, altered, forged or counterfeit, said instrument more fully described as follows:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 01/19/2015, stating VIN 3N1BC13E47L382918 for applicant/owner Adams Auto Sales of Detroit, MI.

contrary to MCL 750.249. [750.249]
FELONY: 14 Years

COUNT 18 DEFENDANT (03): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, or other writing, with intent to injure or defraud, knowing said instrument to be false, altered, forged or counterfeit, said instrument more fully described as follows:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 01/19/2015, stating VIN 1G2ZG558164266454 for applicant/owner Exotic Auto Sales Inc. of Detroit, MI.

contrary to MCL 750.249. [750.249]
FELONY: 14 Years

COUNT 19 DEFENDANT (03): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, or other writing, with intent to injure or defraud, knowing said instrument to be false, altered, forged or counterfeit, said instrument more fully described as follows:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 01/19/2015, stating VIN 1G1ZH57B79F102077 for applicant/owner Ultra Motors of Detroit, MI.

contrary to MCL 750.249. [750.249]
FELONY: 14 Years

COUNT 20 DEFENDANT (03): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, or other writing, with intent to injure or defraud, knowing said instrument to be false, altered, forged or counterfeit, said instrument more fully described as follows:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 01/20/2015, stating VIN 1J4GL48K35W719566 for applicant/owner EZ Used Auto Parts of Detroit, MI.

contrary to MCL 750.249. [750.249]
FELONY: 14 Years

COUNT 21 DEFENDANT (03): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, or other writing, with intent to injure or defraud, knowing said instrument to be false, altered, forged or counterfeit, said instrument more fully described as follows:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 01/20/2015, stating VIN 1FADP3F2XEL212973 for applicant/owner Big 3 Auto Sales of Detroit, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

COUNT 22 DEFENDANT (03): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, or other writing, with intent to injure or defraud, knowing said instrument to be false, altered, forged or counterfeit, said instrument more fully described as follows:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 01/19/2015, stating VIN 1HGCP2F35CA021108 for applicant/owner Noor Used Car Sales of Detroit, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

COUNT 23 DEFENDANT (03): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, or other writing, with intent to injure or defraud, knowing said instrument to be false, altered, forged or counterfeit, said instrument more fully described as follows:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 01/19/2015, stating VIN WDDGF8BB3AR090080 for applicant/owner Chase Auto Sales of Detroit, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

COUNT 24 DEFENDANT (03): UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit public record, instrument, certification, attestation, or other writing, with intent to injure or defraud, knowing said instrument to be false, altered, forged or counterfeit, said instrument more fully described as follows:

Michigan Department of State (aka Secretary of State) TR-13B document concerning and permitting issuance of good State of Michigan motor vehicle titles, on or about the indicated dates: 01/20/2015, stating VIN 1FTNE14W68DA07583 for applicant/owner Whole Sale Motor Auto Sales of Detroit, MI.

contrary to MCL 750.249. [750.249]

FELONY: 14 Years

Upon conviction of a felony or an attempted felony court shall order law enforcement to collect DNA identification profiling samples.

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

Warrant authorized on 03/20/2018
by: [Signature]
Date

[Signature]
Complaining witness signature

Michael G. Frezza (P46949)
Section Head, Public Integrity Unit
Michigan Department of Attorney General,
Cadillac Place, 3030 W. Grand Blvd., Suite 10-200
Detroit, MI 48202
(313) 456-0180

Subscribed and sworn to before me on 3-20-18
Date

[Signature]
Judge/Magistrate/Clerk

044603
Bar no.