

AG CASE

2024-0396955-A

STATE OF MICHIGAN 35 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT	COMPLAINT FELONY	DISTRICT: 20AG 396955 CIRCUIT: CTN: 96-24900814-01 MSP #: MI6397503
District Court ORI: MI820055J	Circuit Court ORI: MI821095J	AG ORI: MI820025A

THE PEOPLE OF THE STATE OF MICHIGAN	Defendant's name and address v ALI FUAD HABASH [REDACTED]	Victim or complainant STATE OF MICHIGAN
Co-defendant(s) (if known) Ahmed Abdul-Abbas Albahia		Complaining Witness SA TANNER LEWANDOWSKY
City/Twp./Village CANTON TOWNSHIP	County in Michigan WAYNE	Date: On or about 08/01/2020-02/01/2023
Defendant DOB Put DOB in Ref. No. row 1 on MC 97	Defendant DLN Put DLN in Ref. No. row 3 on MC 97	Defendant TCN 96-24900814-01
Police agency report no. MI6397503	Charge See below	Defendant SID
		Defendant Sex M
		Defendant Race
		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 Canton, MI, the defendant, contrary to law,

COUNT 1: CRIMINAL ENTERPRISES - CONDUCTING

being a person employed by or associated with an enterprise, to wit: Amazon Return Scam, 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 August 11, 2020, in Canton, 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 \$1,000 or more but less than \$20,000, MCL 750.2184A;

and on or about October 26, 2021, in Canton, 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 \$1,000 or more but less than \$20,000, MCL 750.2184A,

and on or about October 26, 2021, in Canton, 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 \$1,000 or more but less than \$20,000, MCL 750.2184A,

and on or about April 25, 2023, in Canton, 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 \$1,000 or more but less than \$20,000, MCL 750.2184A,

and on or about April 27, 2024, in Canton, 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 \$1,000 or more but less than \$20,000, MCL 750.2184A,

and on or about January 11, 2023, in Canton, 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 \$1,000 or more but less than \$20,000, MCL 750.2184A,

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 Amazon Return Scam or otherwise resulting from the scheme to commit false pretenses, together with any real, personal, or intangible property in which ALI FUAD HABASH 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 false pretenses, including any property constituting an interest in, means of control over, or influence over the Amazon Return Scam involved in said scheme and any real, personal, or intangible property constituting proceeds derived from said scheme.

COUNT 2: 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 3: 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 4: 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 5: 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 6: 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 7: 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 8: FORGERY

did falsely make, alter, forge or counterfeit a promissory note or an order, acquittance or discharge for money or other property, with intent to injure or defraud, to-wit:

TYPE OF INSTRUMENT: Canton Police Department Police Report Numbered 23-1762
DATE ON INSTRUMENT: February 3, 2023
AMOUNT:
INSTRUMENT DRAWN ON:
PAYEE:
DRAWER OR MAKER:
ENDORSER (IF ANY):

contrary to MCL 750.248. [750.248]

FELONY: 14 Years

COUNT 9: UTTERING AND PUBLISHING

did utter and publish as true, a certain false, forged, altered or counterfeit record, instrument 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:

TYPE OF INSTRUMENT: Canton Police Department Police Report Numbered 23-1762
DATE ON INSTRUMENT: February 3, 2023
AMOUNT:
INSTRUMENT DRAWN ON:
PAYEE:
DRAWER OR MAKER:
ENDORSER (IF ANY):

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>7/16/2024</u> by: _____ <i>Michael Friese</i> Date
Michael Friese (P75541) Assistant Attorney General Criminal Trials 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.

[Signature] # 547
Complaining Witness Signature

7/22/24
Date