


<b>STATE OF MICHIGAN</b> <b>17 JUDICIAL DISTRICT</b> <b>3RD JUDICIAL CIRCUIT</b>	<b>COMPLAINT</b> <b>FELONY</b>	<b>DISTRICT:</b> <b>CIRCUIT:</b> <b>CTN:</b> 96-24900508-01 <b>MSP #:</b> 2332899
District Court ORI: MI820125J	Circuit Court ORI: MI821095J	AG ORI: MI820025A

<b>THE PEOPLE OF THE STATE OF MICHIGAN</b>	Defendant's name and address V <b>DEJHON TREVON BUSH</b> 	Victim or complainant <b>STATE OF MICHIGAN</b>			
	Complaining Witness <b>DET. DANIELLE TRIGGER</b>				
Co-defendant(s) (If known) <b>DESMOND WILSON</b>	Date: On or about <b>08/02/2023-04/30/2024</b>				
City/Twp./Village <b>REDFORD, DETROIT</b>	County in Michigan <b>WAYNE</b>	Defendant TCN	Defendant CTN <b>96-24900508-01</b>	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 <b>M</b>	Defendant Race
Police agency report no. <b>23-32899</b>	Charge <b>See below</b>		Maximum penalty <b>See below</b>		

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 in the Township of Redford, and elsewhere, the defendant, contrary to law:

**COUNT 1: CRIMINAL ENTERPRISES - CONDUCTING**

being a person employed by or associated with an enterprise, to wit: Buyers and Grabbers car theft crime 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 January 30, 2024, in Detroit, MI, defendant did commit and/or conspire to commit the following offense for financial gain by obtaining money, property or anything of value, to wit: **STOLEN PROPERTY-RECEIVING & CONCEALING-MOTOR VEHICLE, MCL 750.535(7);**

and on or about January 30, 2024, in Detroit, MI, defendant did commit and/or conspire to commit the following offense for financial gain by obtaining money, property or anything of value, to wit: **STOLEN PROPERTY-RECEIVING & CONCEALING-MOTOR VEHICLE, MCL 750.535(7),**

and on or about December 4, 2023, in Redford, MI, defendant did commit and/or conspire to commit the following offense for financial gain by obtaining money, property or anything of value, to wit: **STOLEN PROPERTY-RECEIVING & CONCEALING-MOTOR VEHICLE, MCL 750.535(7);**

and on or about December 4, 2023, in Detroit, MI, defendant did commit and/or conspire to commit the following offense for financial gain by obtaining money, property or anything of value, to wit: **STOLEN PROPERTY-RECEIVING & CONCEALING-MOTOR VEHICLE, MCL 750.535(7);**

and on or about November 29, 2023, in Detroit, MI, defendant did commit and/or conspire to commit the following offense for financial gain by obtaining money, property or anything of value, to wit: **STOLEN PROPERTY-RECEIVING & CONCEALING-MOTOR VEHICLE, MCL 750.535(7),**

and on or about November 29, 2023, in Redford, MI, defendant did commit and/or conspire to commit the following offense for financial gain by obtaining money, property or anything of value, to wit: **STOLEN PROPERTY-RECEIVING & CONCEALING-MOTOR VEHICLE, MCL 750.535(7),**

and on or about August 26, 2023, in Detroit, MI, defendant did commit and/or conspire to commit the following offense for financial gain by obtaining money, property or anything of value, to wit: **STOLEN PROPERTY-RECEIVING & CONCEALING-MOTOR VEHICLE, MCL 750.535(7),**

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

**COUNT 2: COMPUTERS - USING TO COMMIT A CRIME - MAXIMUM IMPRISONMENT OF 20 YEARS OR MORE OR LIFE**

did use a computer program, computer, computer system, or computer network to commit, attempt to commit, conspire to commit, or solicit another to commit CRIMINAL ENTERPRISE - CONDUCTING, MCL 750.159I; contrary to MCL 752.796, and MCL 752.797(3)(f). [752.7973F]

FELONY: 20 Years and/or \$20,000.00; reimburse government for expenses incurred in relation to violation in manner indicated by MCL 769.1f (see MCL 752.797(7)). A consecutive sentence may be imposed for the underlying conviction.

**COUNT 3: STOLEN PROPERTY - RECEIVING AND CONCEALING - MOTOR VEHICLE**

did buy, receive, possess, conceal, or aid in the concealment of Black 2021 Ford Mustang , a stolen motor vehicle, knowing or having reason to know or reason to believe that the motor vehicle was stolen, embezzled, or converted; contrary to MCL 750.535(7). [750.5357]

FELONY: 5 Years and/or \$10,000.00 or 3 times the value of the motor vehicle, 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). Court may order reimbursement to state or local government for expenses incurred in relation to the incident including but not limited to expenses for emergency response and prosecution. (MCL 769.1f).

**COUNT 4: STOLEN PROPERTY - RECEIVING AND CONCEALING - MOTOR VEHICLE**

did buy, receive, possess, conceal, or aid in the concealment of White 2024 Ford Explorer , a stolen motor vehicle, knowing or having reason to know or reason to believe that the motor vehicle was stolen, embezzled, or converted; contrary to MCL 750.535(7). [750.5357]

FELONY: 5 Years and/or \$10,000.00 or 3 times the value of the motor vehicle, 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). Court may order reimbursement to state or local government for expenses incurred in relation to the incident including but not limited to expenses for emergency response and prosecution. (MCL 769.1f).

**COUNT 5: STOLEN PROPERTY - RECEIVING AND CONCEALING - MOTOR VEHICLE**

did buy, receive, possess, conceal, or aid in the concealment of 2012 Dark Blue Dodge Charger, a stolen motor vehicle, knowing or having reason to know or reason to believe that the motor vehicle was stolen, embezzled, or converted; contrary to MCL 750.535(7). [750.5357]

FELONY: 5 Years and/or \$10,000.00 or 3 times the value of the motor vehicle, 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). Court may order reimbursement to state or local government for expenses incurred in relation to the incident including but not limited to expenses for emergency response and prosecution. (MCL 769.1f).

**COUNT 6: STOLEN PROPERTY - RECEIVING AND CONCEALING - MOTOR VEHICLE**

did buy, receive, possess, conceal, or aid in the concealment of 2013 White Chrysler 300, a stolen motor vehicle, knowing or having reason to know or reason to believe that the motor vehicle was stolen, embezzled, or converted; contrary to MCL 750.535(7). [750.5357]

FELONY: 5 Years and/or \$10,000.00 or 3 times the value of the motor vehicle, 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). Court may order reimbursement to state or local government for expenses incurred in relation to the incident including but not limited to expenses for emergency response and prosecution. (MCL 769.1f).

**COUNT 7: STOLEN PROPERTY - RECEIVING AND CONCEALING - MOTOR VEHICLE**

did buy, receive, possess, conceal, or aid in the concealment of Black 2019 Dodge Ram , a stolen motor vehicle, knowing or having reason to know or reason to believe that the motor vehicle was stolen, embezzled, or converted; contrary to MCL 750.535(7). [750.5357]

FELONY: 5 Years and/or \$10,000.00 or 3 times the value of the motor vehicle, 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). Court may order reimbursement to state or local government for expenses incurred in relation to the incident including but not limited to expenses for emergency response and prosecution. (MCL 769.1f).

**COUNT 8: STOLEN PROPERTY - RECEIVING AND CONCEALING - MOTOR VEHICLE**

did buy, receive, possess, conceal, or aid in the concealment of 2014 Black Chrysler 300, a stolen motor vehicle, knowing or having reason to know or reason to believe that the motor vehicle was stolen, embezzled, or converted; contrary to MCL 750.535(7). [750.5357]

FELONY: 5 Years and/or \$10,000.00 or 3 times the value of the motor vehicle, 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). Court may order reimbursement to state or local government for expenses incurred in relation to the incident including but not limited to expenses for emergency response and prosecution. (MCL 769.1f).

**COUNT 9: STOLEN PROPERTY - RECEIVING AND CONCEALING - MOTOR VEHICLE**

did buy, receive, possess, conceal, or aid in the concealment of 2019 Black Jeep Grand Cherokee, a stolen motor vehicle, knowing or having reason to know or reason to believe that the motor vehicle was stolen, embezzled, or converted; contrary to MCL 750.535(7). [750.5357]

FELONY: 5 Years and/or \$10,000.00 or 3 times the value of the motor vehicle, 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). Court may order reimbursement to state or local government for expenses incurred in relation to the incident including but not limited to expenses for emergency response and prosecution. (MCL 769.1f).

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>05/10/2024</u> by: <u>Eric Sterbis</u> <small>Date</small>
Eric Sterbis (P69689) Assistant Attorney General Criminal Trials Division 3030 W. Grand Blvd., Suite 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