

<b>STATE OF MICHIGAN</b> <b>52-1 JUDICIAL DISTRICT</b> <b>6TH JUDICIAL CIRCUIT</b>	<b>COMPLAINT</b> <b>FELONY</b>	<b>DISTRICT:</b> <b>CIRCUIT:</b> <b>CTN: 96-24900505-01</b> <b>MSP #: 23-32899</b>
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District Court ORI: MI630175J                      Circuit Court ORI: MI630015J                      AG ORI: MI820025A

Defendant's name and address <b>THE PEOPLE OF THE STATE OF MICHIGAN</b> <input checked="" type="checkbox"/> <b>JOSEPH DAVID DOYLE</b> <div style="background-color: black; width: 200px; height: 20px; margin-left: 20px;"></div>	Victim or complainant <b>STATE OF MICHIGAN</b> Complaining Witness <b>DET. DANIELLE TRIGGER</b>
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Co-defendant(s) (If known) <b>BRAYLEN GREEN, KEVIN STEVENSON, ZAMARR JOHNSON</b>	Date: On or about <b>08/02/2023-04/30/2024</b>
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City/Twp./Village <b>NOVI, ALBION, WALLED LAKE, DAVISON, TAYLOR</b>	County in Michigan <b>OAKLAND, GENESSE, WAYNE, CALHOUN</b>	Defendant TCN	Defendant CTN <b>96-24900505-01</b>	Defendant SID
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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
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Police agency report no. <b>23-32899</b>	Charge <b>See below</b>	Maximum penalty <b>See below</b>
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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 OAKLAND**  
 The complaining witness says that on the date above and in the city of Novi, 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 April 26, 2024, in Albion, 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: : STOLEN PROPERTY-RECEIVING & CONCEALING-MOTOR VEHICLE, MCL 750.535(7);

and on or about April 26, 2024, in Albion, 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: STOLEN PROPERTY-RECEIVING & CONCEALING-MOTOR VEHICLE, MCL 750.535(7),

and on or about February 24, 2024, in Walled Lake, 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: STOLEN PROPERTY-RECEIVING & CONCEALING-MOTOR VEHICLE, MCL 750.535(7),

and on or about February 24, 2024, in Walled Lake, 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: STOLEN PROPERTY-RECEIVING & CONCEALING-MOTOR VEHICLE, MCL 750.535(7),

and on or about February 9, 2024, in Davison, 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: STOLEN PROPERTY-RECEIVING & CONCEALING-MOTOR VEHICLE, MCL 750.535(7),

and on or about February 4, 2024, in Taylor, 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: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). [750.15911]

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 Enterprises-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 Grey 2021 Dodge Challenger, 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 2015 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 5: STOLEN PROPERTY - RECEIVING AND CONCEALING - MOTOR VEHICLE**

did buy, receive, possess, conceal, or aid in the concealment of White 2024 Dodge Durango, 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 Grey 2024 Dodge Durango , 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 Green 2021 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 8: STOLEN PROPERTY - RECEIVING AND CONCEALING - MOTOR VEHICLE**

did buy, receive, possess, conceal, or aid in the concealment of White 2019 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).

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>5/9/2024</u> by:  Date
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