

STATE OF MICHIGAN 52-1 JUDICIAL DISTRICT 6TH JUDICIAL CIRCUIT	COMPLAINT FELONY	DISTRICT: CIRCUIT: CTN: 96-24900504-01 MSP #: 23-32899
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District Court ORI: MI630175J Circuit Court ORI: MI630015J AG ORI: MI820025A

THE PEOPLE OF THE STATE OF MICHIGAN	Defendant's name and address ✓ ZAMARR TERRELL JOHNSON 	Victim or complainant STATE OF MICHIGAN Complaining Witness DET. DANIELLE TRIGGER
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Co-defendant(s) (If known) BRAYLEN GREEN, JOSEPH DOYLE III, KEVIN STEVENSON, JR.	Date: On or about 08/02/2023-04/30/2024
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City/Twp./Village NOVI, DETROIT, FENTON, WALLED LAKE, DUNDEE, ROSEVILLE, LIVONIA	County in Michigan OAKLAND, WAYNE, GENESEE, MACOMB	Defendant TCN 	Defendant CTN 96-24900504-01	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 M	Defendant Race
Police agency report no. 23-32899	Charge See below	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 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 28, 2024, in Detroit, 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 3, 2024, in Fenton, 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 3, 2024, in Walled Lake, 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 March 28, 2024, in Detroit, 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 March 23, 2024, in Dundee, 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 March 10, 2024, in Roseville, 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 3, 2024, in Detroit, 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 3, 2024, in Detroit, 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 3, 2024, in Detroit, 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 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 any thing 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 any thing of value, to wit: STOLEN PROPERTY-RECEIVING CONCEALING-MOTOR VEHICLE, MCL 750.535(7),

and on or about January 23, 2024, in Livonia, 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). [750.159I1]

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 White Chevrolet Corvette C7, 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 Blue 2017 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 5: STOLEN PROPERTY - RECEIVING AND CONCEALING - MOTOR VEHICLE

did buy, receive, possess, conceal, or aid in the concealment of 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 2022 BMW X3, 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 Red 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 8: STOLEN PROPERTY - RECEIVING AND CONCEALING - MOTOR VEHICLE

did buy, receive, possess, conceal, or aid in the concealment of Red 2020 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 9: STOLEN PROPERTY - RECEIVING AND CONCEALING - MOTOR VEHICLE

did buy, receive, possess, conceal, or aid in the concealment of Blue 2022 Ford F-350, 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 10: STOLEN PROPERTY - RECEIVING AND CONCEALING - MOTOR VEHICLE

did buy, receive, possess, conceal, or aid in the concealment of Grey Ford Bronco, 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 11: STOLEN PROPERTY - RECEIVING AND CONCEALING - MOTOR VEHICLE

did buy, receive, possess, conceal, or aid in the concealment of Blue 2015 Lincoln MKS, 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 12: 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 13: STOLEN PROPERTY - RECEIVING AND CONCEALING - MOTOR VEHICLE

did buy, receive, possess, conceal, or aid in the concealment of Black 2024 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 14: STOLEN PROPERTY - RECEIVING AND CONCEALING - MOTOR VEHICLE

did buy, receive, possess, conceal, or aid in the concealment of White 2016 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 15: POLICE OFFICER - FLEEING - FOURTH DEGREE - VEHICLE CODE

being the driver of a motor vehicle to whom was given a visual or audible signal by hand, voice, emergency light, or siren by P.O. Ballard and/or P.O. Hussein, a police officer who was in uniform and the officer's vehicle was identified as an official police vehicle, acting in the lawful performance of his/her duty, directing the defendant to bring his/her motor vehicle to a stop, did wilfully fail to obey such direction by increasing the speed of the motor vehicle, or attempting to flee or elude the officer; contrary to MCL 257.602a(2). [257.602A2]

FELONY: 2 Years and/or \$500.00; Secretary of State shall suspend license for 1 year. (MCL 257.319).

COUNT 16: POLICE OFFICER - FLEEING - FOURTH DEGREE - VEHICLE CODE

being the driver of a motor vehicle to whom was given a visual or audible signal by hand, voice, emergency light, or siren by Sgt. Gruenwald, a police officer who was in uniform and the officer's vehicle was identified as an official police vehicle, acting in the lawful performance of his/her duty, directing the defendant to bring his/her motor vehicle to a stop, did wilfully fail to obey such direction by increasing the speed of the motor vehicle, or attempting to flee or elude the officer; contrary to MCL 257.602a(2). [257.602A2]

FELONY: 2 Years and/or \$500.00; Secretary of State shall suspend license for 1 year. (MCL 257.319).

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>5/10/2024</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