

STATE OF MICHIGAN 52-1 JUDICIAL DISTRICT 6TH JUDICIAL CIRCUIT	COMPLAINT FELONY	DISTRICT: CIRCUIT: CTN: 96-24900502-01 MSP #: 23-32899
District Court ORI: MI630175J	Circuit Court ORI: MI630015J	AG ORI: MI820025A

THE PEOPLE OF THE STATE OF MICHIGAN	Defendant's name and address ✓ KEVIN LAMONT STEVENSON JR. <div style="background-color: black; width: 150px; height: 20px; margin-top: 5px;"></div>	Victim or complainant STATE OF MICHIGAN
		Complaining Witness DET. DANIELLE TRIGGER
Co-defendant(s) (If known) BRAYLEN GREEN, JOSEPH DOYLE, ZAMARR JOHNSON		Date: On or about 8/2/2023 - 4/30/2024
City/Twp./Village	County in Michigan	Defendant TCN
NOVI, PONTIAC, FENTON, WALLED LAKE, CHESTERFIELD, NORTHVILLE TWP., ROYAL OAK, CLINTON TWP., MELVINDALE	OAKLAND, WAYNE, MACOMB, GENESEE	96-24900502-01
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
Police agency report no. 23-32899	Charge See below	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 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 3, 2024, in Pontiac, 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, 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 24, 2024, in Chesterfield, 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 24, 2024, in Northville Twp., 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 14, 2024, in Royal Oak, 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 25, 2024, in Novi, 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 November 2, 2023, in Clinton Twp., 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 October 2 and October 3, 2023, in Melvindale, 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 Maroon 2018 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 4: 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 5: 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 6: STOLEN PROPERTY - RECEIVING AND CONCEALING - MOTOR VEHICLE

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

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

did buy, receive, possess, conceal, or aid in the concealment of White 2024 Chevrolet Camaro, 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 Purple 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).

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

did buy, receive, possess, conceal, or aid in the concealment of Orange 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 10: STOLEN PROPERTY - RECEIVING AND CONCEALING - MOTOR VEHICLE

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

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

HABITUAL OFFENDER - THIRD OFFENSE NOTICE

Take notice that the defendant was twice previously convicted of a felony or an attempt to commit a felony in that on or about May 10, 2022, he or she was convicted of the offense of STOLEN PROPERTY - RECEIVING AND CONCEALING - MOTOR VEHICLE in violation of MCL 750.535(7) in the 3rd Circuit Court, Court for Wayne County, State of Michigan;


And on or about May 10, 2022, he or she was convicted of the offense of POLICE OFFICER - FLEEING - 3RD DEGREE in violation of MCL 750.479A in the 3rd Circuit Court, Court for Wayne County, State of Michigan.

Therefore, defendant is subject to the penalties provided by MCL 769.11. [769.11]

PENALTY: Twice the maximum sentence on primary offense or a lesser term. The maximum penalty cannot be less than the maximum term for a first conviction.

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:

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