

STATE OF MICHIGAN 17 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT	COMPLAINT FELONY	DISTRICT: CIRCUIT: CTN: 96-24900507-01 MSP #: 2332899
District Court ORI: MI820125J	Circuit Court ORI: MI821095J	AG ORI: MI820025A

THE PEOPLE OF THE STATE OF MICHIGAN	Defendant's name and address ✓ DESMOND MAURICE WILSON [REDACTED]	Victim or complainant STATE OF MICHIGAN
Co-defendant(s) (If known) Dejhon Bush		Complaining Witness DET. DANIELLE TRIGGER
City/Twp./Village REDFORD, ROYAL OAK, SOUTHFIELD, DEARBORN HEIGHTS, LIVONIA	County in Michigan WAYNE, OAKLAND	Date: On or about 08/02/2023-04/30/2024
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 96-24900507-01
Police agency report no. 23-32899	Charge See below	Defendant CTN 96-24900507-01
		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 above 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 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: RECIEVING AND CONCEALING MOTOR VEHICLE CONTRARY TO MCL 750.535(7);

and on or about February 17, 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: RECIEVING AND CONCEALING MOTOR VEHICLE CONTRARY TO MCL 750.535(7),

and on or about January 1, 2024, in Southfield, 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: RECIEVING AND CONCEALING MOTOR VEHICLE CONTRARY TO MCL 750.535(7),

and on or about December 4, 2024, in Redford, MI, defendant did commit the following offense for financial gain by obtaining money, property or any thing of value, to wit: RECIEVING AND CONCEALING MOTOR VEHICLE CONTRARY TO 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 any thing of value, to wit: RECIEVING AND CONCEALING MOTOR VEHICLE CONTRARY TO 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 any thing of value, to wit: RECIEVING AND CONCEALING MOTOR VEHICLE CONTRARY TO 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 any thing of value, to wit: RECIEVING AND CONCEALING MOTOR VEHICLE CONTRARY TO MCL 750.535(7),

and on or about September 23, 2023, in Dearborn Heights, 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: RECEIVING AND CONCEALING MOTOR VEHICLE CONTRARY TO MCL 750.535(7),

and on or about August 2, 2023, 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: RECEIVING AND CONCEALING MOTOR VEHICLE CONTRARY TO 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 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: BREAKING & ENTERING - A BUILDING WITH INTENT

did break and enter a store, located at 16901 Mack Ave., Detroit, MI, with the intent to commit the crime of larceny therein; contrary to MCL 750.110. [750.110]

FELONY: 10 Years

COUNT 4: 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 5: STOLEN PROPERTY - RECEIVING AND CONCEALING - MOTOR VEHICLE

did buy, receive, possess, conceal, or aid in the concealment of vehicle from Bob Maxey Ford, 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 Black 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 7: STOLEN PROPERTY - RECEIVING AND CONCEALING - MOTOR VEHICLE

did buy, receive, possess, conceal, or aid in the concealment of Dark Blue 2012 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 8: STOLEN PROPERTY - RECEIVING AND CONCEALING - MOTOR VEHICLE

did buy, receive, possess, conceal, or aid in the concealment of White 2013 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 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 10: STOLEN PROPERTY - RECEIVING AND CONCEALING - MOTOR VEHICLE

did buy, receive, possess, conceal, or aid in the concealment of Black 2014 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 11: STOLEN PROPERTY - RECEIVING AND CONCEALING - MOTOR VEHICLE

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

did buy, receive, possess, conceal, or aid in the concealment of Black 2016 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>5/10/2024</u> by: <u>Eric Sterbis</u> 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