

City of Detroit
Office of Inspector General
2014 4th Quarter Report

(October 1, 2014 – December 31, 2014)



January 28, 2015

Office of Inspector General (OIG) Complaints

The OIG received a total of 165 complaints during the 4th Quarter of 2014.

Office of Inspector General Initiated Cases

The OIG initiated 156 cases during this quarter. The investigations involved 12 different departments or agencies. Many of the cases initiated by the OIG listed the Human Resources Department as the subject. The Human Resources Department, the State of Michigan, and the OIG are jointly conducting an unemployment insurance fraud investigation involving current and past Detroit public servants. The number of initiated cases does not indicate wrongdoing by the Human Resources Department, but is instead evidence of their partnership in the effort.

Department/Agency	# of Investigations
Human Resources Department	135
Detroit Animal Control	1
Police Department	4
General Services Department	6
Department of Homeland Security OIG	1
Water and Sewerage Department	2
Detroit Transportation Corporation People Mover	2
Transportation Department	1
Office of the Chief Investigator	1
BSEED	1
Law Department	1
Other	1
Total	156

Office of Inspector General Closed Cases

A case is considered closed when an OIG file manager completes their investigation and the Inspector General approves a finding. During the 4th Quarter, the OIG closed 47 cases. The following list provides a brief synopsis of each closed case.

2013-DA-0046

Complainant alleged that employees in the Municipal Parking Department abused their authority by wrongfully ticketing the complainant on numerous occasions. The OIG investigation confirmed that the complainant's disability placard allowed him to park in valid spaces for 24 hours. The OIG notified the Municipal Parking Department of the incorrect tickets and the courts revoked the complainant's tickets.

2014-CW-0011

Complainant alleged that various Park Rite locations were not posting consistent rates and that the vendor was not properly paying the City according to the contract. The OIG combined this case with OIG Case #2013-DF-0082 (Exhibit A).

2014-DA-0015

Complainant, a city contractor, alleged that employees in the General Services Department abused their authority by refusing to pay the contractor \$197,689.55 for sprinkler repair services the complainant had performed. The OIG found no evidence to support the allegation.

2014-NA-0062

OIG determined that a public servant fraudulently collected unemployment benefits while working full time for the City of Detroit. The OIG investigation led to criminal charges being filed against the public servant in the 36th District Court (Exhibit B).

2014-NA-0063

OIG determined that a public servant fraudulently collected unemployment benefits while working full time for the City of Detroit. The OIG investigation led to criminal charges being filed against the public servant in the 36th District Court (Exhibit C).

2014-NA-0064

OIG determined that a public servant fraudulently collected unemployment benefits while working full time for the City of Detroit. The OIG investigation led to criminal charges being filed against the public servant in the 36th District Court (Exhibit D).

2014-NA-0065

OIG determined that a public servant fraudulently collected unemployment benefits while working full time for the City of Detroit. The OIG investigation led to criminal charges being filed against the public servant in the 36th District Court (Exhibit E).

2014-NA-0066

OIG determined that a public servant fraudulently collected unemployment benefits while working full time for the City of Detroit. The OIG investigation led to criminal charges being filed against the public servant in the 36th District Court (Exhibit F).

2014-NA-0067

OIG determined that a public servant fraudulently collected unemployment benefits while working full time for the City of Detroit. The OIG investigation led to criminal charges being filed against the public servant in the 36th District Court (Exhibit G).

2014-NA-0069

OIG determined that a public servant fraudulently collected unemployment benefits while working full time for the City of Detroit. The OIG investigation led to criminal charges being filed against the public servant in the 36th District Court (Exhibit H).

2014-NA-0071

OIG determined that a public servant fraudulently collected unemployment benefits while working full time for the City of Detroit. The OIG investigation led to criminal charges being filed against the public servant in the 36th District Court (Exhibit I).

2014-NA-0072

OIG determined that a public servant fraudulently collected unemployment benefits while working full time for the City of Detroit. The OIG investigation led to criminal charges being filed against the public servant in the 36th District Court (Exhibit J).

2014-NA-0073

OIG determined that a public servant fraudulently collected unemployment benefits while working full time for the City of Detroit. The OIG investigation led to criminal charges being filed against the public servant in the 36th District Court (Exhibit K).

2014-NA-0074

OIG determined that a public servant fraudulently collected unemployment benefits while working full time for the City of Detroit. The OIG investigation led to criminal charges being filed against the public servant in the 36th District Court (Exhibit L).

2014-NA-0075

OIG determined that a public servant fraudulently collected unemployment benefits while working full time for the City of Detroit. The OIG investigation led to criminal charges being filed against the public servant in the 36th District Court (Exhibit M).

2014-NA-0076

OIG determined that a public servant fraudulently collected unemployment benefits while working full time for the City of Detroit. The OIG investigation led to criminal charges being filed against the public servant in the 36th District Court (Exhibit N).

2014-NA-0077

OIG determined that a public servant fraudulently collected unemployment benefits while working full time for the City of Detroit. The OIG investigation led to criminal charges being filed against the public servant in the 36th District Court (Exhibit O).

2014-NA-0078

OIG determined that a public servant fraudulently collected unemployment benefits while working full time for the City of Detroit. The OIG investigation led to criminal charges being filed against the public servant in the 36th District Court (Exhibit P).

2014-NA-0079

OIG determined that a public servant fraudulently collected unemployment benefits while working full time for the City of Detroit. The OIG investigation led to criminal charges being filed against the public servant in the 36th District Court (Exhibit Q).

2014-NA-0080

OIG determined that a public servant fraudulently collected unemployment benefits while working full time for the City of Detroit. The OIG investigation led to criminal charges being filed against the public servant in the 36th District Court (Exhibit R).

2014-NA-0081

OIG determined that a public servant fraudulently collected unemployment benefits while working full time for the City of Detroit. The OIG investigation led to criminal charges being filed against the public servant in the 36th District Court (Exhibit S).

2014-NA-0082

OIG determined that a public servant fraudulently collected unemployment benefits while working full time for the City of Detroit. The OIG investigation led to criminal charges being filed against the public servant in the 36th District Court (Exhibit T).

2014-NA-0083

OIG determined that a public servant fraudulently collected unemployment benefits while working full time for the City of Detroit. The OIG investigation led to criminal charges being filed against the public servant in the 36th District Court (Exhibit U).

2014-NA-0084

OIG determined that a public servant fraudulently collected unemployment benefits while working full time for the City of Detroit. The OIG investigation led to criminal charges being filed against the public servant in the 36th District Court (Exhibit V).

2014-NA-0087

OIG determined that a public servant fraudulently collected unemployment benefits while working full time for the City of Detroit. The OIG investigation led to criminal charges being filed against the public servant in the 36th District Court (Exhibit W).

2014-NA-0088

OIG determined that a public servant fraudulently collected unemployment benefits while working full time for the City of Detroit. The OIG investigation led to criminal charges being filed against the public servant in the 36th District Court (Exhibit X).

2014-NA-0094

OIG determined that a public servant fraudulently collected unemployment benefits while working full time for the City of Detroit. The OIG investigation led to criminal charges being filed against the public servant in the 36th District Court (Exhibit Y).

2014-NA-0095

OIG determined that a public servant fraudulently collected unemployment benefits while working full time for the City of Detroit. The OIG investigation led to criminal charges being filed against the public servant in the 36th District Court (Exhibit Z).

2014-NA-0096

OIG determined that a public servant fraudulently collected unemployment benefits while working full time for the City of Detroit. The OIG investigation led to criminal charges being filed against the public servant in the 36th District Court (Exhibit AA).

2014-NA-0097

OIG determined that a public servant fraudulently collected unemployment benefits while working full time for the City of Detroit. The OIG investigation led to criminal charges being filed against the public servant in the 36th District Court (Exhibit AB).

2014-NA-0100

OIG determined that a public servant fraudulently collected unemployment benefits while working full time for the City of Detroit. The OIG investigation led to criminal charges being filed against the public servant in the 36th District Court (Exhibit AC).

2014-NA-0101

OIG determined that a public servant fraudulently collected unemployment benefits while working full time for the City of Detroit. The OIG investigation led to criminal charges being filed against the public servant in the 36th District Court (Exhibit AD).

2014-NA-0102

OIG determined that a public servant fraudulently collected unemployment benefits while working full time for the City of Detroit. The OIG investigation led to criminal charges being filed against the public servant in the 36th District Court (Exhibit AE).

2014-CA-0182

Complainant alleged that a contractor's fraud conviction might have had an impact on work performed through the City of Detroit's marina contracts. The OIG determined that these previous fraudulent actions were unrelated to the contractor's work performance with the City.

2014-DF-0187

The City of Detroit Finance Department informed the OIG that a City procurement card had been fraudulently used for unauthorized charges. The OIG worked jointly with the Detroit Police Department to identify the responsible City employee. As a result of the investigation, the Office of the Wayne County Prosecutor charged the employee with nine felonies (Exhibit AF).

2014-DA-0194

Complainant alleged general corruption in the Department of Public Works City Engineering Division including payment for incomplete and nonconforming work. The complainant was unable to provide specific information regarding these allegations. As a result, the OIG was unable to substantiate the allegations.

2014-DC-0222

Complainant alleged that two public servants employed by the Finance Department Assessments Division improperly reduced the 2013 taxable values of commercial and residential property for personal gain. Following an investigation, the OIG referred the matter to a law enforcement agency in accordance with the Detroit Charter.

2014-DA-0273

Complainant alleged that a public servant within the Detroit Police Department abused their authority by disclosing the details of a confidential criminal complaint. The OIG found no evidence to substantiate this complaint.

2014-NA-0277

Complainant contacted the OIG regarding the possibility of a conflict of interest involving a Citizens' District Council. The complainant withdrew the complaint following preliminary discussions with the OIG. The OIG found no independent evidence suggesting that the matter should be investigated further.

2014-DC-0278

Complainant alleged that a sergeant with Detroit Police Department Internal Affairs abused her authority by refusing to take a complaint against another DPD sergeant. The OIG was unable to substantiate the allegation.

2014-DA-0280

Complainant alleged that the Detroit Water and Sewerage Department purposely failed to take the required steps to prevent problems with overflow sewage discharge into the Detroit River. The OIG determined that the complaint was without merit.

2014-DA-0281

Complainant, a member of the Detroit City Council, requested an investigation into the actions of Corporation Counsel Melvin Hollowell regarding a statement that he allegedly made to the Emergency Loan Board regarding City Council's involvement in discussions relating to a land transfer. The OIG closed this investigation after the complainant withdrew the complaint.

2014-NA-0343

Complainant alleged that a City towing contractor wrongfully towed his vehicle from in front of his home. The complainant was unable to provide necessary information to investigate the case.

2014-DA-0344

Complainant alleged that public servants with the City of Detroit Office of the Chief Investigator (OCI) had abused their authority by improperly withholding the results of an administrative investigation from him. The OIG referred the complainant to the City of Detroit Board of Police Commissioners, the entity with direct oversight over OCI.

2014-NA-0364

Complainant alleged that a former Detroit Water and Sewerage Department (DWSD) employee had inappropriate relationships with various DWSD contractors. Due to lack of information provided by the complainant, the OIG could not substantiate the allegation.

2014-DA-0376

Complainant alleged that a Detroit Department of Transportation general manager abused his authority by refusing to pay the complainant for overtime worked and denying him the right to participate in the LEAN Process Improvement Team. Complainant filed a union grievance and the OIG closed the investigation.

2014-DA-0397

Complainant alleged that public servants in the Detroit Water and Sewerage Department abused their discretion by laying him off in retaliation for making comments critical of the department. The Office of Inspector General was unable to substantiate the allegations.

Exhibit A

**CITY OF DETROIT CONTRACTOR PARK-RITE
EVALUATION**

CASE#: 2013-DF-0082



**JAMES W. HEATH
INSPECTOR GENERAL**

October 15, 2014

I. Introduction

The Office of Inspector General (OIG) initiated an investigation examining Contract No. 2832603 (“the contract”) between the City of Detroit and Park-Rite Detroit (“Park-Rite”). The purpose of the investigation was to determine whether Park-Rite properly managed and complied with certain aspects of the contract, including minimizing expenses during the term of the contract and requesting reimbursement for only reasonable and necessary operating expenses. The investigation also sought to determine whether the Municipal Parking Department (“MPD”), the city agency charged with monitoring the contract, employed an appropriate level of oversight to ensure Park-Rite’s compliance.

The OIG concludes that Park-Rite committed numerous contract violations including exceeding annual reimbursement limits, co-mingling funds, not properly documenting employee hours, and charging the City of Detroit for manager and employee bonuses. MDP did not sufficiently monitor Park-Rite and ensure that the provisions of the contract were upheld. Park-Rite’s actions resulted in the City of Detroit overpaying Park-Rite a total of \$176,646.39 in 2012 and 2013.

II. Background

a. Contract between the City of Detroit MPD and Park-Rite

MPD provides on-street and off-street public parking services; enforces City of Detroit parking ordinances; and coordinates parking with economic development projects throughout the city. Park-Rite is a provider of parking services and operates lots and garages in Detroit, Ann Arbor and Royal Oak.

The contract required Park-Rite to operate, manage, and maintain the city’s parking facilities. Park-Rite also agreed to provide consulting and advisory services to the city concerning the parking facilities without additional charge, except that the contractor was to be paid for any reimbursable expenses pursuant to the contract. Consulting and advisory services included event planning, a yearly revenue-generating plan, and a cost-saving plan that included monthly maintenance and annual building and equipment inspection schedules.¹

The contract required Park-Rite to “endeavor to minimize expenses during the term of the contract” which commenced at 12:01 am on January 1, 2011 and ended at midnight on December 31, 2013.² The contract stated that compensation for services provided was not to exceed the amount of \$7,499,520.00 for the 36-month term of the contract, inclusive of all reimbursable expenses.³

b. Facilities Managed by Park-Rite

Park-Rite managed the following parking facilities for MPD:

¹ City of Detroit/ Park-Rite Detroit Agreement 2011, pg. 22

² Though this contract has expired, Park-Rite Detroit continued to operate, manage, and maintain the City of Detroit owned parking facilities until October 4, 2014

³ Id at pg. 8.

- Eastern Market Garage- 2727 Riopelle Street, Detroit, MI 48207
- Ford Underground Garage- 30 East Jefferson Avenue, Detroit, MI 48226
- Grand Circus Park Garage- 1600 Woodward Avenue, Detroit, MI 48226
- Millennium Garage- 432 West Congress Street, Detroit, MI 48226
- Premier Underground Garage- 1206 Woodward Avenue, Detroit, MI 48226
- Cadillac-Farmer Lot, 1025 Farmer Street, Detroit, MI 48226⁴

c. Documents Reviewed

- Professional Services Contract between City of Detroit Municipal Parking Department and Park-Rite Detroit.
- Park-Rite Daily Reports
- 2012 and 2013 Park-Rite Timecards
- Park-Rite Cash Handling Procedures
- Park-Rite Bank Deposits and Ticket Retention Procedures
- Rates and Hours of operation.
- Municipal Parking Department Monthly Facility Rate
- Facility Rates
- CBA between Park-Rite Detroit and Teamsters Local Union No. 283
- Contract between the City of Royal Oak and Park-Rite
- Contract between the University of Michigan and Park-Rite
- 2012 and 2013 Municipal Parking Department Finance-Accounts Payable Check Requests
- 2012 and 2013 Park-Rite Total Reimbursable Expenses Request to Municipal Parking Department
- 2014 Remaining Vacation and Sick Time for Park-Rite employees
- 2012, 2013, and 2014 Park-Rite employee list with job classification, facility, and hourly pay rate
- Park-Rite Employee Seniority List
- Park-Rite Employee Handbook
- 2012 and 2013 Park-Rite Custom Time Card Report
- 2012, 2013, and 2014 Park-Rite Payroll List

⁴ As of December 2013, the Cadillac-Farmer Lot is no longer under the control of MPD.

- 2012, 2013, and 2014 Park-Rite Excel Spreadsheet created to input Employee Payroll
- Park-Rite Paycor Payroll System
- Park-Rite Written Job Descriptions
- 2011, 2012, and 2013 Municipal Parking Department Summary of Deposits Made- Revenue Fund
- Photos of Grand Circus, Millennium, Premier, Ford Underground Garage, Eastern Market, and Cadillac Farmer
- 2012 and 2013 Municipal Parking Department reimbursements to Park-Rite
- Videos of Grand Circus

d. Interviews Conducted

- Michael Aubrey, Sr.- Chief Executive Officer of Park-Rite
- Sandra Sobotka- General Manager of Park-Rite
- Theresa Kozak- Manager of Park-Rite
- Benjamin Watkins- Manager of Park-Rite
- Christopher Abousouan- Park-Rite Supervisor
- Cindy David- Park-Rite Cashier at Grand Circus
- Barbara Williams- Park-Rite Cashier at Ford Underground Garage
- Michael Williams- Park-Rite Maintenance at Grand Circus
- Brandon Patton- Park-Rite Attendant / Cashier at Premier
- Jamie Isaac- Park-Rite Cashier at Grand Circus, Eastern Market, Premier, and Millennium
- John Zarves- Park-Rite Maintenance at Premier

III. Analysis

a. Hours worked by Employees

Park-Rite failed to properly document hours worked by Park-Rite employees. As a result, there is no documentation to support a portion of the payroll and payroll taxes submitted by Park-Rite to MPD for reimbursement.

The contract states that reimbursable expenses include payroll salaries and wages and payroll taxes.⁵ It also states that for each item that is reimbursable, the contractor shall list the type of expense, the date such services were rendered and shall submit the corresponding receipts and approvals together with any other supporting documentation. All contractual expenses of whatever kind are subject to audit by the city.⁶ Park-Rite supervisor, Christopher Abousouan, stated that he entered the time each employee worked into the payroll system. However, this submission is based on employee schedules and not timecards. Park-Rite General Manager, Sandra Sobotka, routinely used the information given to her by Mr. Abousouan to prepare the payroll reimbursement request that was submitted to MPD.

The *Park-Rite Employee Handbook* states that “all employees are required to use a timecard to track their hours worked. Failure to punch in will require the supervisor’s authorization to write work hours on the timecard. If an employee works at five different facilities in a week, the employee will turn in five timecards.”⁷ Also, the Collective Bargaining Agreement (“CBA”) states that “time shall be computed from the time that the employee registers in, as scheduled, and until the time he is effectively released from duty. Meal periods, however, shall not be included.⁸ All employees must punch out whenever they leave their facility for any reason.”⁹

The OIG obtained Park-Rite employee timecards from 2012 and 2013 which were used to support the payroll reimbursement Park-Rite requested from the city. In violation of the contract and their own policy, Park-Rite failed to maintain a complete set of timecards for all employees at Grand Circus, Millennium, Premier, and Eastern Market.¹⁰ For example, in 2013 full-time employee John Zarves, who worked primarily at Millennium, had only 15 timecards out of 52 weeks. However, he was paid for 5,838.75 hours. His son, Michael Zarves, a part-time employee who worked at several garages, only had 3 timecards out of 52 weeks despite being paid for 1701 hours. Employees missing the greatest number of time cards were those who worked a large number of overtime hours compared to other employees with the same classification.

Sandra Sobotka, manages the Grand Circus, Millennium, Premier, and Eastern Market garages. She stated in her interview that some employees did not have timecards because the time clocks did not always function properly. She maintains that full-time employees work set hours so she knew if they were working their assigned shift. However, the problems with the time clock appear to have affected employees working in the same garage differently. For example, in 2013 Harold Johnson, a full-time Millennium employee, had all 52 timecards whereas John Zarves only had 15 timecards.

⁵ Social Security Taxes, Federal Unemployment Taxes and State Unemployment taxes may be reimbursable. An approval tax rate schedule shall be submitted in conjunction with the contractor’s budget for each fiscal year.

⁶ Pg. 33.

⁷ Agreement Between Park-Rite Detroit/ Teamsters Local Union No. 283. 2011, pg. 14; Park-Rite Employee Handbook, pg. 7.

⁸ The CBA is the Agreement between Park-Rite Detroit and Teamsters Local Union No. 283.

⁹ Agreement Between Park-Rite Detroit/ Teamsters Local Union No. 283. 2011, pg. 14.

¹⁰ Park-Rite Employee Handbook, pg. 7. “All employees are required to use a time card to track their hours worked. Failure to punch in will require your supervisor’s authorization to write work hours on the card. If you work at 5 different facilities in a week, you will turn in 5 time cards.

Ms. Sobotka did not account for how part-time employees who did not work set schedules had their time monitored, nor did she explain how employee overtime was monitored and documented. Further, Ms. Sobotka indicated that she spent the majority of her day at the Millennium Garage and was therefore not at the other garages to monitor employees' attendance. Though Benjamin Watkins is the manager assigned to Premier, he spends, on average, less than an hour a day at the garage. Christopher Abousouan monitors special events at Grand Circus but stated that he also works mostly at Millennium. As such, these managers all spent the majority of their time at Millennium and were not monitoring employees at the other parking facilities on a consistent basis.

The only parking structure that had a full set of timecards was Ford Underground Garage. Theresa Kozak, manager of Ford, stated in her interview that all employees are required to punch in and out. She indicated that if the time clock is not working or an employee forgets to punch in, she must be notified immediately so she can sign their timecard. She spends all of her time at Ford.

Park-Rite managers have all stated that their time clocks often malfunction, yet Park-Rite, who is responsible for documenting employee hours, has not replaced the malfunctioning time clocks. Mr. Abousouan stated that the city would not authorize this purchase; however, he did not have documentation that such a request was ever made in writing to MDP. Nevertheless, Park-Rite is responsible for the purchase and maintenance of the time clocks. The contract states that for all purposes, city employees will remain employees of the city and the contractor's employees will remain employees of the contractor.¹¹ Park-Rite is responsible for the preparation of its own payroll¹² and record maintenance.¹³ Further, the city does not reimburse the contractor for the purchase, rental, or maintenance costs for any office equipment.

Park-Rite submits their monthly expenses to MDP for approval. The monthly reimbursement request includes employee payroll including taxes, healthcare, management fee, petty cash, and maintenance costs with supporting documentation. The monthly reimbursement requests for 2012 and 2013 show that employee hours were not properly reported to the City of Detroit. The contract states that "straight time and overtime must be listed separately and overtime will be reimbursed with prior written approval only."¹⁴ Ms. Sobotka, Ms. Kozak, and Mr. Abousouan stated that they did not seek prior approval from MPD before scheduling their employees for overtime.

In the payroll documents reviewed for 2012 and 2013, any hours worked over 40 hours per week were not entered as overtime. Ms. Sobotka stated that she entered the information into Park-Rite's payroll system as she had been instructed and could not specifically state if there was a box for overtime. A review of the system showed that there is a category to distinguish

¹¹ Pg. 7

¹² The Contractor shall be responsible for the preparation of its own payroll, as well as, filing Social Security, Withholding Taxes, and Worker's Compensation for the Contractor's employees.¹²- pg. 31

¹³ Record Maintenance- Costs related to maintenance of Records, Accounts Payable, forms, envelopes, postage and an accrual system of bookkeeping and accounting are not reimbursable expenses.

¹⁴ Pg. 34.

overtime hours from regular hours for each employee that was not utilized by Park-Rite. (Appendix A)

In many cases, Park-Rite listed overtime hours as regular hours and, at times, some employees were listed several times as having worked simultaneously at various garages. Ms. Sobotka was asked why some employees were listed several times but she was unable to provide an explanation. An example of how employee hours were submitted for reimbursement is listed below.

Hours worked by John Zarves for the weeks of August 26, 2013 through September 8, 2013

Garage	Pay Rate	REG Hours	Gross Pay
Grand Circus	12.00	63.5	\$762
Grand Circus	12.00	31.75	\$381
Millennium	12.00	72	\$864
Millennium	12.00	20	\$240
Millennium	12.00	57.5	\$690
Millennium	12.00	8 VAC	\$96
Millennium	12.00	8 BDAY	\$96
	With V/BD	260.75	\$3129
TOTAL		244.75	\$2937

Hours worked by John Zarves for the weeks of September 9, 2013 through September 22, 2013

Garage	Pay Rate	REG Hours	Gross Pay
Millennium	12.00	80	\$960
Millennium	12.00	80	\$960
Millennium	12.00	32	\$384
Millennium	12.00	56	\$672
TOTAL		248	\$2976

Employees are paid every two weeks. A full-time employee who did not work overtime would be paid for 80 hours. Though Mr. Zarves' hours are all noted as regular hours, for the pay period ending September 8, 2013, he worked 164.75 hours over the expected 80 hours and was also paid 8 hours of vacation and 8 hours for his birthday. For the pay period ending September 22, 2013, he worked 168 hours over the typical 40-hour work week.

During the two week pay period ending on September 8, 2013, Mr. Zarves worked an average of 24.475 hours a day if averaged over 10 days or 17.48 hours averaged over 14 days. During the two week pay period ending on September 22, 2013, Mr. Zarves worked an average of 24.8 hours a day if averaged over 10 days or 17.7 hours averaged over 14 days.

Ms. Sobotka stated in her interview that she submits the reimbursable expenses to MPD and personally signs off on the submitted documentation. The payroll information was entered

in, at best, a negligent manner. The most complete payroll documentation¹⁵ indicated that in 2012 Mike Zarves worked 1,718.25 hours, an average of 33 hours per week. The same documentation indicated that in 2013, John Zarves worked 2,080 hours, an average of 40 hours a week. John Zarves was paid \$12 per hour and was paid \$108,203.51 over a two year period. Mike Zarves, a part-time employee, was paid \$13.78 per hour and was paid \$77,543.55 over a two year period. Based on the information provided, between 2012 and 2013, John Zarves was overpaid by \$53,598 and Mike Zarves was overpaid by \$28,955.23 for a total cost to the city of at least \$82,553.23. No documentation was provided to the OIG to verify that these employees worked the additional hours above those indicated by the custom timecards. Therefore Park-Rite should not have been reimbursed for the hours for which no documentation exists.

MPD is responsible for ensuring that they do not reimburse improper requests, and therefore should have more carefully reviewed the documentation. However, Park-Rite also has a duty to fulfill its contractual obligation and list straight time and overtime separately as well as seek prior approval for this expense.

- **Park-Rite's internal payroll information is inconsistent**

The OIG requested complete payroll documentation to verify the hours worked by Park-Rite employees. In response to this request, Park-Rite produced custom timecard printouts, payroll reimbursement requests made to MPD, and physical timecards. The custom timecards reflected payroll information entered by Mr. Abousouan based on employees' schedules. This information was submitted to Ms. Sobotka. She used this information to produce the payroll request submitted to MPD.

The custom timecards did not match the payroll reimbursement requests given to MPD. Also, Park-Rite did not produce a complete copy of physical timecards for 2012 and 2013. The majority of the missing physical timecards belonged to John Zarves and Mike Zarves.

For example, in 2013, the custom timecards produced by Park-Rite indicated that John Zarves worked 2,064 hours and took 16 hours of vacation. However, the payroll information provided by Park-Rite indicated that John Zarves was paid for 5,838.75 hours and took 400 hours of vacation. There is a difference of 3,774.75 hours between the information Ms. Sobotka entered for John Zarves in 2013 and submitted to MPD versus the information she received from Mr. Abousouan. Also, none of these hours match Mr. Zarves physical timecards. Further, a review of the physical timecards revealed that in addition to missing timecards, John Zarves had some timecards indicating overlapping hours at different garages. (Appendix B)

This is all evidence that Park-Rite did not properly document employee hours. Employees were not held accountable for documenting their hours and adequate steps were not taken by Park-Rite to ensure the correctness of the information they submitted to the city. Further, Park-Rite managers failed to ensure correct and complete documentation for hours worked.

¹⁵ The most complete payroll documentation provided by Park-Rite was the custom timecards.

- **Hours worked by John Zarves and Mike Zarves**

The payroll hours listed for Mike Zarves and John Zarves were extreme in comparison to other employees with the same job classification. There is no evidence that MPD approved any overtime for him and the custom and physical timecards do not indicate that he worked over 40 hours a week. Only the payroll reimbursement request submitted by Ms. Sobotka suggested John Zarves worked additional hours. This is problematic because John Zarves did not punch a timecard to verify his hours and his supervisor, who was responsible for entering his time into the payroll software, did not corroborate the hours submitted to MPD by Ms. Sobotka.

The payroll reimbursement requests submitted by Ms. Sobotka indicated that Mike Zarves, a part-time employee, averaged 140 hours biweekly for year 2012. John Zarves, a full-time employee, averaged 216.74 hours biweekly in 2013, which averages 21 hours¹⁶ a day. John Zarves admitted during his interview that he could not have worked those hours consistently over a long period of time.

John Zarves' assigned facility is Millennium Garage where he worked maintenance from 5am to 1pm. He stated during his interview that when he is asked to complete maintenance at another garage, he refuses to do this during his regular work hours. He stated that he tells Ms. Sobotka that he will not go until the end of his shift. He also stated that he is asked to complete tasks that are not part of his job description such as painting, and he should not be expected to perform this duty during regular work hours. John Zarves stated that all of the hours worked after his shift is overtime and paid at time and a half. However, that is not what some of his paychecks indicate. (Appendix C). Another Park-Rite employee stated in her interview that John Zarves "bragged" that he is paid overtime as straight time so his overtime is not noticed by the city.

Ms. Sobotka stated that John Zarves worked overtime painting, power washing and making repairs to the facilities. Mr. Patton and Mr. Watkins stated that Park-Rite power washes the stairwells but not the entire structure. Mr. Patton and Mr. Watkins also indicated that power washing takes approximately four hours to complete with two people. John Zarves stated that power washing takes up to a week to complete, which was contradictory to statements made by other employees.

Ms. Sobotka stated that John Zarves was the only person able to complete these tasks. Conversely, Ms. Kozak stated that any type of painting and maintenance can be given to any employee, including cashiers. Ms. Sobotka stated that she often assisted him with his work and that he, at times, slept in his vehicle. Ms. Sobotka stated that all the hours over 80 that John Zarves worked were overtime hours paid at a rate of 1.5.

Ms. Sobotka's statement was contradictory to the payroll sheet which clearly had John Zarves listed as working regular hours. Ms. Sobotka's explanation for this contradiction was that she entered the time wrong or someone changed it. However, Ms. Sobotka stated that she is the

¹⁶ This average is based on a 5 day work week. If the hours were averaged for a 7 day work week, Mr. Zarves would have had to have an average of 17.356 hours per day (6334.75 hours divided by 365 days).

only person that enters the payroll into Paycor. Additionally, Mr. Abousouan stated that he enters employee hours into a Park-Rite payroll system and sends this information to Ms. Sobotka. Timecards do not exist to support his entries.

Much of the work that Ms. Sobotka and John Zarves stated he was completing during the overtime hours is outlined in the contract between the City and Park-Rite as duties and responsibilities for the maintenance workers. These include daily activities such as picking up trash in all areas, sweeping, emptying waste containers and replacing trash liners, and ensuring that all lights are working in restrooms, elevators and parking areas. Weekly activities include inspecting floor surface for cracks and potholes and inspecting the entire ceiling for concrete deterioration and signs of leaks. Monthly activities include hosing down facility ramps and curbs and scrub with a stiff brush and cleaning expansion joint glands as necessary using a broom or vacuum. Semi-Annual activities include washing down the parking ramps and other areas of the Parking Facility to remove salt, grease and dirt and painting the Parking Facilities including, but not limited to stairwells, elevator lobbies, curbs, equipment and garage walls.¹⁷ This work should have been completed during regular work hours. Also, the contract indicates that the:

“Contractor shall be expected to develop, coordinate, and implement a parking facility maintenance, minor repair and restoration program. This program includes without limitation one annual high-pressure water wash-down, one annual flood rising of all concrete ramp deck surfaces, periodic sealing of concrete deck surfaces, crack caulking, painting, cleaning of drains, bulb replacement, fixture replacement, law maintenance, snow removal, and other seasonal maintenance. The Contractor shall coordinate this maintenance program and no additional compensation shall be given to the Contractor for any costs associated with the oversight of the program or for loss of revenue due to ongoing maintenance, or any future repair and restoration of the Parking Facilities.¹⁸”

Further, Park-Rite has a duty to the City of Detroit to keep expenses at a minimum. Yet John Zarves was allowed to dictate overtime by refusing to complete assigned tasks during his regular work hours. There is no indication that he does not have time during his regular work schedule to complete assigned tasks. Also, his managers did not require him to complete his work duties when he is ordered to do so.

¹⁷ Pg. 29

¹⁸ Pg. 23.

b. Other Improper Reimbursements

• **Vacation Benefits**

The CBA and *Park-Rite Employee Handbook* state that all full-time employees with more than one year of service receive vacation with full pay at the employee's current wage rate. Vacations cannot be postponed and allowed to accumulate from year to year but must be completed each year. Preference for vacation periods shall be granted to senior employees. All vacations earned must be taken by employees and no employee shall be entitled to vacation pay in lieu of vacation except by mutual agreement between the employee and the employer.¹⁹

Length of Service	Vacation
Less than one year	None
Between 1 and 2 years	1 week
Between 2 and 8 years	2 weeks
Between 8 and 15 years	3 weeks
Over 15 years	4 weeks

Although the policy specifically states that vacations cannot be postponed and allowed to accumulate from year to year, John Zarves was reimbursed for 280 hours of vacation totaling \$3,290 in 2012 and reimbursed for 400 hours of vacation totaling \$4,800 in 2013. His custom timecards revealed that he took one vacation day in 2013. Ms. Sobotka was unable to state why he had received pay for so many vacation hours. (Appendix E)

• **Bonuses**

Park-Rite requested and received reimbursement for employee bonuses as well as manager bonuses. These represent non-reimbursable expenses per the contract. Expenses, fees, and awards in connection with arbitration proceedings under a labor agreement or in the negotiation and preparation of a labor contract involving parking operations are not reimbursable.²⁰ Despite this, MPD reimbursed Park-Rite for employees' bonuses in 2012 totaling \$2,200; \$1,600 in 2013; and \$700 in 2014. Mr. Aubrey and Ms. Sobotka both stated that Park-Rite does not seek reimbursement for manager bonuses. However, the reimbursement requests submitted to MPD show that MPD paid Park-Rite for managers' bonuses in 2012 totaling \$4,935 and \$1,000 in 2013.

The CBA provides that all full-time employees who have both no property damage claims and who lose no work time due to on the job injuries for a six month consecutive period shall receive a \$100 bonus. Such bonus shall be paid for the periods of January through June 30 and July 1 through December 31. For the 2011 contract year, the bonus shall be paid for the

¹⁹ CBA, pg. 17; Employee Handbook, pg. 3

²⁰ Pg. 34

period of July 1 through December 31 only. The bonus shall be included in the employee's regular paycheck after the close of the six month period. Park-Rite management indicated that all employees receive the bonuses and suggested that they do not take into account the provision regarding property damage claims and on the job injuries.

The provision for employee bonuses was not added to the CBA until 2011. The contract between the City of Detroit and Park-Rite went into effect on January 1, 2011. It is not disputed that Park-Rite has a right to give their employees bonuses. However, this is an expense that Park-Rite must pay on its own and not seek reimbursement from the city.

c. Yearly Reimbursement Amounts Exceeded

Park-Rite was obligated to minimize expenses during the term of the contract. The contract states that in no event shall the annual reimbursable expenses for each year during the term of the contract exceed the Annual Total amounts listed below:²¹

Garage	Not-to-Exceed Annual Reimbursement Cost
Eastern Market Garage	\$76,815
Ford Underground Garage	\$435,900
Grand Circus Garage	\$340,857
Millennium Garage	\$287,759
Premier Garage	\$282,309
Cadillac-Farmer Lot	\$85,207
Total	\$1,508,847

The above limits do not constitute pre-approval of any reimbursable expenses. The contractor shall be solely responsible for any expenses which would otherwise be reimbursable beyond the total annual amounts for each year, with an exception for reimbursable expenses resulting from additional services required by the City.²²

In 2012, Park-Rite exceeded the annual total amount of reimbursable expenses at Grand Circus and Cadillac Farmer by \$37,277.87. Finally, in 2013, Park-Rite exceeded the annual total amount of reimbursable expenses at Grand Circus, Millennium, Ford, and Cadillac Farmer by a total of \$78,106.69.²³

A review of the payroll expenses at Eastern Market for the period ending December 16, 2012 revealed that Park-Rite was reimbursed for \$15,652.79 whereas the payroll ending December 2, 2012 was \$237.80 and December 30, 2012 was \$137.80. The payroll

²¹ Pg. 32.

²² Pg. 33.

²³ Documentation was requested regarding all reimbursable expenses. However, MPD and Park-Rite failed to produce this information for Grand Circus, Premier, Millennium, Eastern Market, Ford, and Cadillac Farmer for March 2012; Ford for October 2013; and Cadillac Farmer for June 2013 and December 2013. Therefore an average for reimbursable expenses was determined at each garage to determine an approximation of requested reimbursable expenses.

documentation submitted for December 16, 2012 was for Grand Circus and should have been submitted under that garage. The employees and number of hours for which reimbursement was sought align with Grand Circus and not Eastern Market. Eastern Market has limited December hours and two employees. When the payroll is attributed to the proper garage, for the December 16, 2012 payroll, Grand Circus exceeded its annual total amount by an additional \$15,652.79, bringing the total amount exceeded in 2012 to \$52,930.66.

This occurred again in December 2013. A portion of Grand Circus' payroll was shifted to Premier and Eastern Market. A portion of the Premier payroll documentation submitted for December 11, 2013 and December 15, 2013 was for Grand Circus and should have been submitted under that garage. The December 29, 2013 payroll for Grand Circus was shifted to Eastern Market, though it should have been included in Grand Circus' monthly reimbursement request. Including those three December 2013 payrolls, Grand Circus exceeded its annual total amount by an additional \$16,638.68. For 2013, the total amount exceeded was \$94,745.37.

A portion of Cadillac Farmer's payroll was shifted to Eastern Market for the payroll ending December 1, 2013 totaling \$4,313.05. This portion should have been included in Cadillac Farmer's reimbursable expense request. Including this payroll, Cadillac Farmer exceeded its annual total amount by an additional \$4,313.05, bringing the total amount for 2013 to (\$94,745.37 + 4,313.05) \$99,058.42.

By shifting payroll to other garages, Park-Rite hid or minimized overruns. By limiting the overruns in such a way, it appeared Park-Rite was closer to the not-to-exceed annual reimbursement costs put in place by MPD. Also, at Grand Circus, Millennium, and Premier, where the greatest overruns occurred, certain employees were paid for working undocumented overtime hours.

Additionally, Ford was reimbursed for several non-reimbursable expenses including office supplies. Therefore, the costs of these overages were not due to additional services required by the City but to Park-Rite's inability to minimize expenses at these garages. Therefore, the exceeding amounts should be the sole responsibility of Park-Rite.

d. Contract Violations

Managers told OIG staff that they had not read the contract and were not familiar with its contents. However, Park-Rite CEO, Michael Aubrey, Sr. indicated that Ms. Sobotka is responsible for the contract's fulfillment. It appears that no one at Park-Rite is being held accountable to both know the contents of the agreement and to monitor compliance.

- **Managers not properly assigned to garages**

Park-Rite was responsible for designating on-site management to facilitate the operation of the parking garages. The contract states that a report must be submitted to the city which includes the names of the managers, the city parking facilities to which they are assigned, and their hours at each parking facility. According to the contract, each manager can manage no more than three city parking facilities. The designated employee performing on-site management must be on site for a minimum of 1,040 hours per year, which shall be documented

by Park-Rite with a verifiable actual schedule on a weekly basis. The salary of Park-Rite's off-site management is not a reimbursable expense. Park-Rite may utilize other management personnel to assist the designated employee in operating the parking facilities. However, the cost of such additional assistance for off-site management shall also be a non-reimbursable expense.²⁴

Park-Rite managers do not have a verifiable schedule. Reimbursements do not coincide with managers' stated assigned facility responsibilities. Ms. Kozak is only assigned to Ford but she received a salary at 3 different garages. Ms. Sobotka received pay for two garages at equal reimbursement but did not work equally at each garage. She stated during her interview that she actually oversees four garages (Premier, Millennium, Grand Circus, and Eastern Market) but works mostly at Millennium. Mr. Watkins received a salary for Premier and Grand Circus but stated in his interview that he oversees Premier but works mostly at Millennium. Mr. Abousouan, who is an hourly supervisor, also works at Millennium as well as oversees Grand Circus.

- **Co-Mingled Funds**

The contract states that the "Contractor shall be responsible for the development and implementation of revenue control and cash handling procedures and shall instruct its personnel to comply with same."²⁵ It further states that the contractor shall not co-mingle its funds with city funds in the required Revenue Account or Expense Account.²⁶ If such a violation occurs, the contractor shall be subject to "a penalty of ten percent (10%) of the Contractor's monthly management fee at the facility in question for each violation of revenue control or cash handling procedures."²⁷

Park-Rite is required to "deposit daily, on forms provided by the City, all receipts of said parking operations into a bank account established by the City for all of the Parking Facilities."²⁸ The Daily Reports submitted by Park-Rite to MPD show that on several occasions various Park-Rite employees, including Ms. Sobotka, cashed both personal checks and payroll checks out of the daily revenue to be deposited into city bank accounts. For example, on April 17, 2012 a Park-Rite employee cashed a \$1,000 personal check made out to cash from the daily revenue. On August 16, 2012, a Park-Rite employee cashed a \$200 Park-Rite check made out to cash. On July 18, 2012, a Park-Rite employee cashed a \$771.40 payroll check. On June 27, 2013, Park-Rite employees cashed payroll checks totaling \$1,747.65 and a \$50 Park-Rite check made out to cash.

A review of a random sampling of daily reports revealed co-mingling of funds occurred at Grand Circus and Millennium parking facilities. At Grand Circus in 2012, of 31 daily reports reviewed, 6 showed a co-mingling of funds. In 2013, 5 daily reports out of 33 reviewed indicated a co-mingling of funds. At Millennium Garage in 2012, of 31 daily reports reviewed, 5

²⁴ Pg. 26

²⁵ Pg. 28

²⁶ Pg. 36

²⁷ Pg. 28

²⁸ Pg. 36

showed a co-mingling of funds. In 2011, 1 daily reports out of 3 reviewed indicated a co-mingling of funds.

This is a clear violation of the contract and Park-Rite should be subject to the 10% penalty of the monthly management fee at Grand Circus and Millennium for each violation. The monthly management fee at Grand Circus is \$2,800 and \$2,700 at Millennium. Therefore, based on the random sampling, for each violation at Grand Circus, Park-Rite should pay a total penalty of \$3080. The penalty for co-mingling funds at Millennium should be \$1620. A thorough review of all daily reports submitted to MPD should be completed to determine the total number of violations and resulting penalty.

- **Improper petty cash reimbursements**

Park-Rite requested and received reimbursement for various petty cash purchases. However, not all petty cash purchases were reimbursable expenses. Reimbursable expenses include the following:

Payroll-Salaries & Wages; Payroll Taxes; Medical Insurance net cost Supervisor Fees; The cost of one full-time supervisor for up to three Parking Facilities; Parking Facility Maintenance including pest control, snow removal, and debris removal are included; Facility Repair; Garage/ Lot Equipment and Equipment Maintenance; Telephones excluding personal calls, cellular telephones, pages and associated maintenance expenses are non-reimbursable; Revenue Control Access Equipment and Maintenance; Security; Lot License Fee; and On-site Management Fees.²⁹

Non-reimbursable expenses include:

Worker's Compensation, pension costs, 401K plan costs, retirement costs and life insurance costs; Off-site Management Fees; Office Supplies; Printing and Photocopying of Required Reports; Office Equipment Purchase, Maintenance and Supplies; Postage & Freight; Bond Fees & Insurance Premiums; Bank Charges; Vehicle Maintenance; Uniforms; Record Maintenance; and Accounts Receivable.³⁰

To obtain reimbursement Park-Rite must list the type of expense, the date such services were rendered and attach any corresponding receipts and approvals together with any other information or supporting documentation deemed necessary. Per the contract reimbursable expenses are reasonable and necessary operating expenses of Park-Rite for the parking facilities, and they are subject to pre-approval by the city. Payment for reimbursable expenses is contingent upon the city's receipt of an invoice itemizing each expense for which Park-Rite seeks reimbursement.³¹

²⁹ Pg. 34-35

³⁰ Pg. 35-36.

³¹ Pg. 5.

Park-Rite requested and received reimbursement for various petty cash purchases that were non-reimbursable expenses. MPD reimbursed for such non-reimbursable items as office supplies, chairs, and stamps. MPD also approved petty cash reimbursements for items that lack documentation despite the contract specifically stating this is required. Some of these purchases may have been appropriate. However the OIG was unable to verify the cost and actual purchase of the items because they lacked supporting documentation. For 2012, MPD reimbursed Park-Rite for petty cash expenses that lacked documentation totaling \$7,555.25. MPD also reimbursed Park-Rite for either non-reimbursable items or items that lacked documentation totaling \$34,601.36.³² For 2013, MPD reimbursed Park-Rite for petty cash expenses that lacked documentation totaling \$6,651. MPD also reimbursed Park-Rite for either non-reimbursable items or items that lacked documentation totaling \$34,850.55.

e. Conclusion

MPD entered into a contract with Park-Rite for their expertise in providing parking services. Park-Rite has operated and managed parking lots and garages in Detroit, Ann Arbor, and Royal Oak. In 2012, Park-Rite sought and received reimbursement for expenses that were not properly documented, including payroll and petty cash. The amount of reimbursement sought in 2013 increased greatly as outlined above. As a result of the City of Detroit overpaid Park-Rite \$176,646.39.

1. Park-Rite sought the following improper reimbursements:
 - a. Unverifiable vacation hours to John Zarves in 2012 and 2013, totaling 624 hours and \$7,488.
 - b. Payroll reimbursed for John Zarves for which no documentation exists totaling \$53,598.
 - c. Payroll reimbursement for Michael Zarves for which no documentation exists totaling \$28,955.23.
 - d. Park-Rite Managers' bonuses in 2012 totaling \$4,935 and \$1,000 in 2013.
 - e. Park-Rite for employees' bonuses in 2012 totaling \$2,200, \$1,600 in 2013 and \$700 in 2014.
 - f. Petty Cash reimbursements of non-reimbursable expenses totaling \$83,658.16.
2. Park-Rite should have been assessed the following penalty:
 - a. A 10% penalty of Park-Rite's monthly management fee at the facility where cash handling violations occurred.

³² MPD did not provide any documentation for Park-Rite's reimbursement request for March 2012.

- MDP and the City of Detroit Law Department should review this matter to determine what recourse the City of Detroit has in terms of recovering overpayments.

Appendix A

Employee Profile + Add Earning					
Code	Description	Required	Rate	Hours	Amount
Reg	Regular	13000	0.000000		2,348.0000
OT	Overtime Hours @ 1.5	13000	0.000000		
Salary	Salary	13000	0.000000		
Vac	Vacation	13000	0.000000		

Calculate

Appendix B

No.	IN	OUT	Notes
6/4	IN	5:00 PM	SOP
	OUT	1:00 PM	
6/5	IN	5:00 PM	SOP
	OUT	1:00 PM	
6/6	IN	5:00 PM	SOP
	OUT	1:00 PM	
6/7	IN	5:00 PM	SOP
	OUT	1:00 PM	
6/8	IN	5:00 PM	SOP
	OUT	1:00 PM	
6/9	IN	5:00 PM	SOP
	OUT	1:00 PM	
6/10	IN	5:00 PM	SOP
	OUT	1:00 PM	

No.	IN	OUT	Notes
6/4	IN	5:00 PM	SOP
	OUT	1:00 PM	
6/5	IN	5:00 PM	SOP
	OUT	1:00 PM	
6/6	IN	5:00 PM	SOP
	OUT	1:00 PM	
6/7	IN	5:00 PM	SOP
	OUT	1:00 PM	
6/8	IN	5:00 PM	SOP
	OUT	1:00 PM	
6/9	IN	5:00 PM	SOP
	OUT	1:00 PM	
6/10	IN	5:00 PM	SOP
	OUT	1:00 PM	

4222

John Jones

DATE	4/6	IN	OUT	TIME
		OUT	IN	1:00 P.M.
		OUT	IN	5:00 P.M.
		OUT	IN	1:00 P.M.
	4/7	OUT	IN	7:00 P.M.
		OUT	IN	1:00 P.M.
	4/8	OUT	IN	5:00 P.M.
		OUT	IN	1:00 P.M.
	4/11	OUT	IN	8:00 P.M.
		OUT	IN	1:00 P.M.
	4/20	OUT	IN	7:00 P.M.
		OUT	IN	1:00 P.M.
	4/21	OUT	IN	10:00 P.M.
		OUT	IN	11:30 P.M.
	4/22	OUT	IN	
		OUT	IN	

4222

John Jones

DATE	4/6	IN	OUT	TIME
		OUT	IN	5:00 P.M.
		OUT	IN	1:00 P.M.
		OUT	IN	5:00 P.M.
		OUT	IN	1:00 P.M.
	4/8	OUT	IN	5:00 P.M.
		OUT	IN	1:00 P.M.
	4/11	OUT	IN	5:00 P.M.
		OUT	IN	1:00 P.M.
	4/20	OUT	IN	1:00 P.M.
		OUT	IN	1:00 P.M.
		OUT	IN	1:00 P.M.
		OUT	IN	1:00 P.M.
		OUT	IN	1:00 P.M.
		OUT	IN	1:00 P.M.
		OUT	IN	1:00 P.M.

2222

John Jones

DATE		IN	OUT	TIME
		OUT	IN	8:00 P.M.
		OUT	IN	11:00 P.M.
		OUT	IN	
		OUT	IN	
		OUT	IN	
		OUT	IN	
		OUT	IN	3:00 P.M.
		OUT	IN	11:00 P.M.
		OUT	IN	7:00 P.M.
		OUT	IN	11:00 P.M.
		OUT	IN	
		OUT	IN	
		OUT	IN	
		OUT	IN	
		OUT	IN	

2222

Grand Child

DATE	7/7	IN	OUT	TIME
		OUT	IN	4:00 P.M.
		OUT	IN	12:00 P.M.
	7/17	OUT	IN	4:00 P.M.
		OUT	IN	7:00 P.M.
	8/8	OUT	IN	12:00 P.M.
		OUT	IN	11:00 P.M.
		OUT	IN	11:00 P.M.
	8/22	OUT	IN	4:00 P.M.
		OUT	IN	7:00 P.M.
	8/25	OUT	IN	1:00 P.M.
		OUT	IN	12:00 P.M.
	9/9	OUT	IN	9:00 P.M.
		OUT	IN	1:00 P.M.

Appendix C

PARL-RITE DETROIT LLC
400 FIVE COLLARS
DETROIT MI 48226

Check # 1506283
Date 07/05/2013
Valid After 180 Days

Pay to the Order of

FIVE HUNDRED EIGHTY-EIGHT & SIXTY DOLLARS

\$*****588.66

JOHN ZARVES
[Redacted]

FIFTH THIRD BANK
CINCINNATI OH

AW/CP
Paycor, Inc.

PARL-RITE DETROIT LLC
400 FIVE COLLARS
DETROIT MI 48226

Check # 1506283
Date 07/05/2013
Valid After 180 Days

Pay to the Order of

FIVE HUNDRED EIGHTY-EIGHT & SIXTY DOLLARS

\$*****588.66

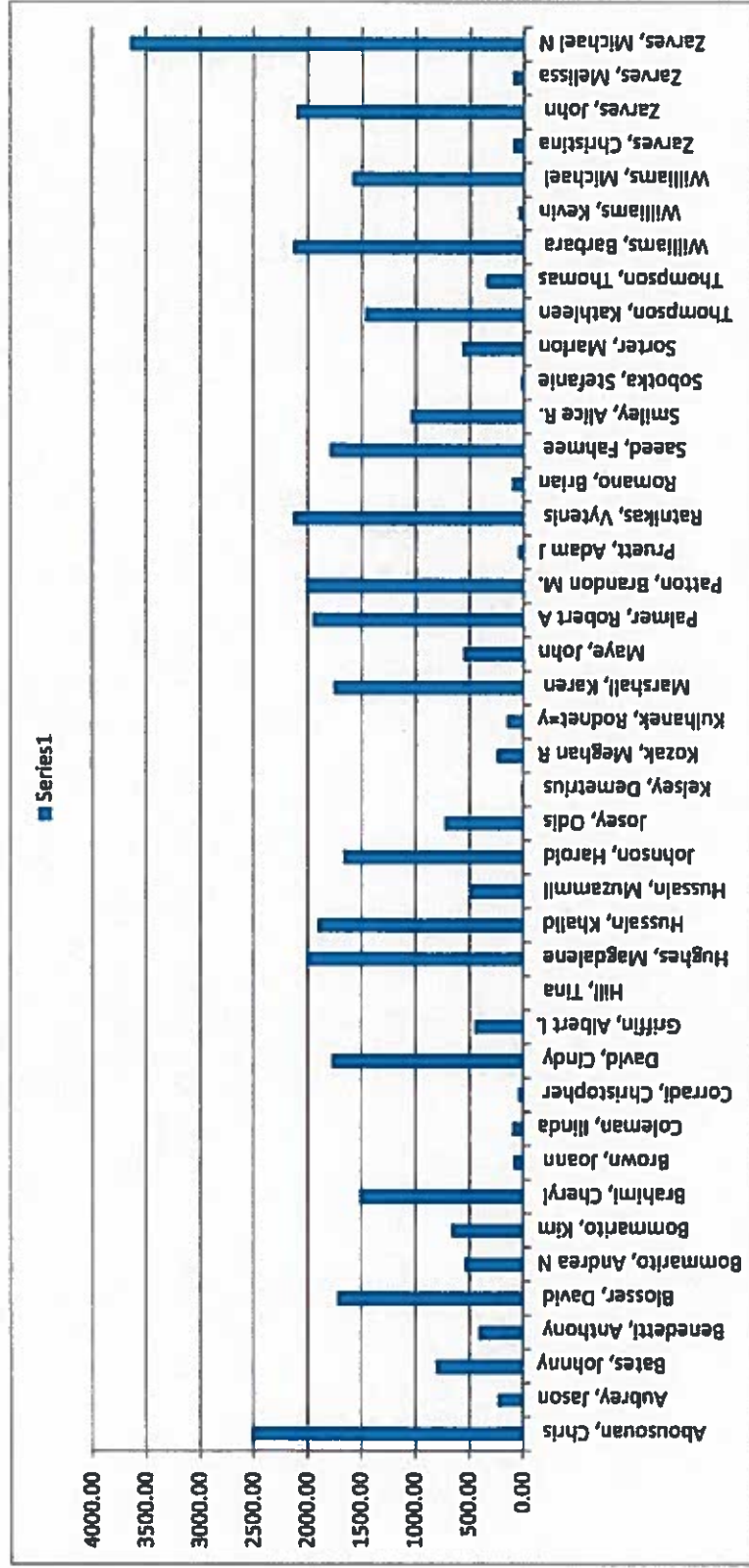
JOHN ZARVES
[Redacted]

FIFTH THIRD BANK
CINCINNATI OH

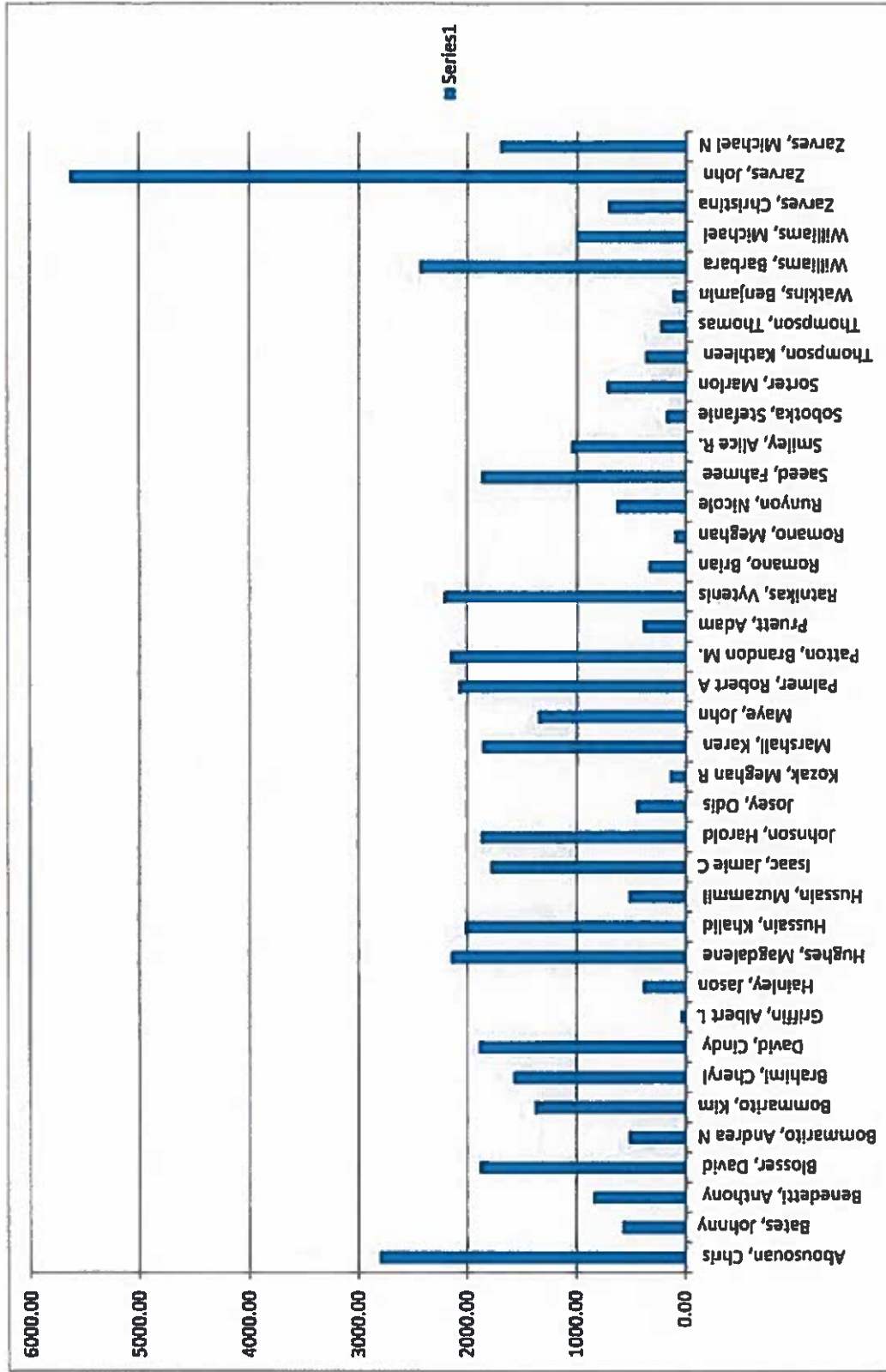
AW/CP
Paycor, Inc.

Appendix D

Hours worked by Park Rite employee for 2012

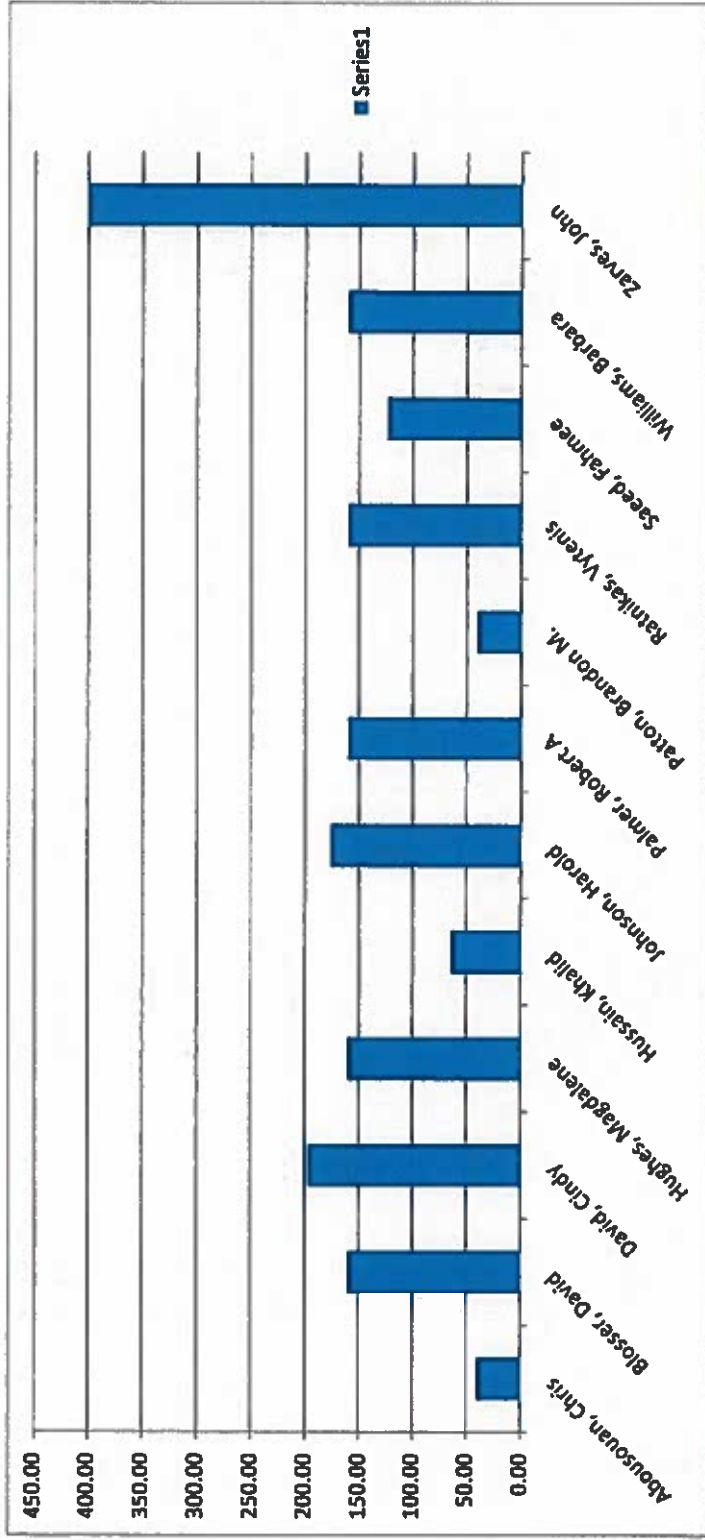


Hours worked by Park Rite employee for 2013



Appendix E

Paid vacation time for Park Rite employee for 2013 (managers not included)



Paid vacation time for Park Rite employee for 2012 (managers not included)

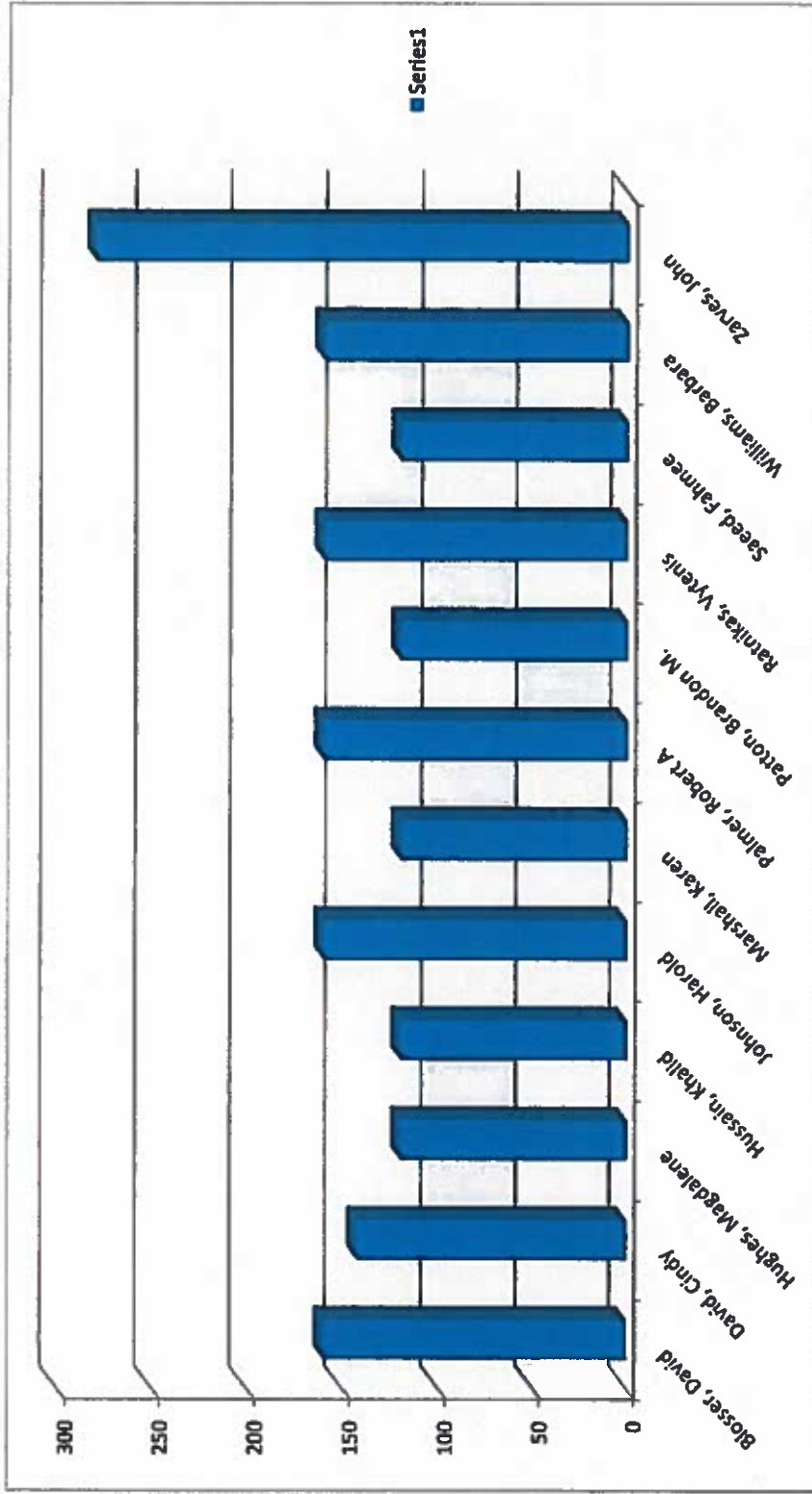


Exhibit B

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT		COMPLAINT MISDEMEANOR		DISTRICT: CIRCUIT: CTN: 96-14900644-01 MSP#: 11020001
District Court ORI: MIB20385J		Circuit Court ORI: MI- MIB21095J		AG ORI: MIB20025A
THE PEOPLE OF THE STATE OF MICHIGAN			Victim or complainant	
v			STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY	
TINA LANAY ANDERSON [REDACTED]			Complaining Witness S/A CHARLES BRADLEY S/A MARK KACHAR	
Co-defendant(s)			Date: On or about 09/21/2011 - 03/31/2012	
City/Twp./Village DETROIT	County in Michigan WAYNE	Defendant SID		Defendant DOB [REDACTED]
Charge(s) See Below			Maximum Penalty See Below	

STATE OF MICHIGAN, COUNTY OF WAYNE

The complaining witness says that on the date above and at/or in the City of Detroit, the defendant, contrary to law,

COUNT 1: UNEMPLOYMENT COMPENSATION FRAUD - FALSE STATEMENT/MISREPRESENTATION - LOSS OF \$1,000 TO \$25,000

did make a false statement or representation knowing it to be false in order to obtain or increase a benefit or other payment under the Michigan Employment Security Act for herself, the amount improperly obtained, being \$1,000 or more but less than \$25,000; contrary to MCL 421.54(b)(ii)(A). [421.54BIIA]

MISDEMEANOR: 4 times the amount of fraud and 1 Year, or community service for up to 1 Year but not to exceed 2,080 hours, or a combination of imprisonment and community service not to exceed 1 Year

The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on 4-22-14 by: _____
Date
DMH

Denise M. Hart (P45127)
Assistant Attorney General
Michigan Department of Attorney General
Criminal Division
3030 W. Grand Blvd. Cadillac Place, Suite 10-200
Detroit, MI 48202
313-458-0180

Security for costs posted

[Signature]
Complaining witness signature

Subscribed and sworn to before me on 4/24/14
Date

[Signature]
Judge/Magistrate/Clerk

Bar no. _____

Exhibit C

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT	COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 96-14900631-01 MSPA:
District Court ORI: MI820365J	Circuit Court ORI: MI- MI821095J	Ad ORI: MI820925A
THE PEOPLE OF THE STATE OF MICHIGAN v TIFFANY TRISHAWN HARDRICK XXXXXXXXXX XXXXXXXXXX Co-defendant(s)		Victim or complainant: STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY Complaining Witness S/A MARK KACHAR S/A CHARLES BRADLEY
City/Twp./Village DETROIT	County in Michigan WAYNE	Defendant SID XXXXXXXXXX
Charge(s) See Below		Date: On or about 07/01/2011 - 09/30/2011 Defendant DOB XXXXXXXXXX Maximum Penalty See Below

STATE OF MICHIGAN, COUNTY OF WAYNE

The complaining witness says that on the date above and at/or in the City of Detroit, the defendant, contrary to law,

COUNT 1: UNEMPLOYMENT COMPENSATION FRAUD - FALSE STATEMENT/MISREPRESENTATION - LOSS OF \$1,000 TO \$25,000

did make a false statement or representation knowing it to be false in order to obtain or increase a benefit or other payment under the Michigan Employment Security Act for herself, the amount improperly obtained, being \$1,000 or more but less than \$25,000; contrary to MCL 421.54(b)(II)(A). [421.54BIIA]

MISDEMEANOR: 4 times the amount of fraud and 1 Year, or community service for up to 1 Year but not to exceed 2,080 hours, or a combination of imprisonment and community service not to exceed 1 Year

The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on <u>4-12-14</u> by: _____ Date <u>D.M.Hart</u>
Denise M. Hart (P45127) Assistant Attorney General Michigan Department of Attorney General Criminal Division 3030 W. Grand Blvd. Cadillac Place, Suite 10-200 Detroit, MI 48202 313-466-0180 <input type="checkbox"/> Security for costs posted

Complaining witness signature

Subscribed and sworn to before me on 4/24/14
Date

Judge/Magistrate/Clerk Bar no.

Exhibit D

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT		COMPLAINT MISDEMEANOR		DISTRICT: CIRCUIT: CTN: 96-1490055 8-01 MSP#: <u>14058388</u>
District Court ORI: MI820365J		Circuit Court ORI: MI- MI821095J		AG ORI: MI820025A
THE PEOPLE OF THE STATE OF MICHIGAN v LYNETTE MARIE JACKSON [REDACTED] [REDACTED] Co-defendant(s)			Victim or complainant: STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY Complaining Witness S/A MARK KACHAR S/A CHARLES BRADLEY	
City/Twp/Village DETROIT		County in Michigan WAYNE		Defendant SID [REDACTED]
Charge(s) See Below		Date: On or about 05/01/2011 - 07/31/2012		Defendant DOB [REDACTED]
		Maximum Penalty See Below		

STATE OF MICHIGAN, COUNTY OF WAYNE

The complaining witness says that on the date above and at/or in the City of Detroit, the defendant, contrary to law,

COUNT 1: UNEMPLOYMENT COMPENSATION FRAUD - FALSE STATEMENT/MISREPRESENTATION - LOSS OF \$1,000 TO \$25,000

did make a false statement or representation knowing it to be false in order to obtain or increase a benefit or other payment under the Michigan Employment Security Act for herself, the amount improperly obtained, being \$1,000 or more but less than \$25,000; contrary to MCL 421.54(b)(ii)(A). [421.54BIIA]

MISDEMEANOR: 4 times the amount of fraud and 1 Year, or community service for up to 1 Year but not to exceed 2,080 hours, or a combination of imprisonment and community service not to exceed 1 Year

The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on 4-22-14 by: _____
Date

DM Hart
Denise M. Hart (P45127)
Assistant Attorney General
Michigan Department of Attorney General
Criminal Division
3030 W. Grand Blvd. Cadillac Plaza, Suite 10-200
Detroit, MI 48202
313-458-0180

Security for costs posted

[Signature]
Complaining witness signature

Subscribed and sworn to before me on 4/24/14
Date

[Signature]
Judge/Magistrate/Clerk Bar no

Exhibit E

STATE OF MICHIGAN 35 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT	COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 98-14900548-01 MSP#:
District Court ORI: MI820385J	Circuit Court ORI: MI- MI821095J	AG ORI: MI820026A' 0552

THE PEOPLE OF THE STATE OF MICHIGAN		Victim or complainant
v		STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY
JAMES EARL PARKER [REDACTED]		Complaining Witness S/A CHARLES BRADLEY S/A MARK KACHAR
Co-defendant(s)		Date: On or about 05/22/2011 - 05/19/2012
City/Twp./Village DETROIT	County in Michigan WAYNE	Defendant DOB [REDACTED]
Charge(s) See Below		Maximum Penalty See Below

STATE OF MICHIGAN, COUNTY OF WAYNE

The complaining witness says that on the date above and at/or in the City of Detroit, the defendant, contrary to law,

COUNT 1: UNEMPLOYMENT COMPENSATION FRAUD - FALSE STATEMENT/MISREPRESENTATION - LOSS OF \$1,000 TO \$25,000

did make a false statement or representation knowing it to be false in order to obtain or increase a benefit or other payment under the Michigan Employment Security Act for himself, the amount improperly obtained, being \$1,000 or more but less than \$25,000; contrary to MCL 421.54(b)(ii)(A). [421.54BIIA]

MISDEMEANOR: 4 times the amount of fraud and 1 Year, or community service for up to 1 Year but not to exceed 2,080 hours, or a combination of imprisonment and community service not to exceed 1 Year

The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on 4/24/14 by: _____
Date
DMH

Denise M. Hart (P45127)
Assistant Attorney General
Michigan Department of Attorney General
Criminal Division
3030 W. Grand Blvd. Cadillac Place, Suite 10-200
Detroit, MI 48202
313-458-0180

Security for costs posted

[Signature]
Complaining witness signature

Subscribed and sworn to before me on 4/24/14 Date

[Signature]
Judge/Magistrate/Clerk Bar no.

Exhibit F

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT		COMPLAINT MISDEMEANOR		DISTRICT: CIRCUIT: CTN: 98-14900545-01 MSP#:
District Court ORI: MI820385J		Circuit Court ORI: MI- MI821095J		AG ORI: MI820025A
THE PEOPLE OF THE STATE OF MICHIGAN			Victim or complainant:	
v			STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY	
KEYLETON LOUIS SMITH [REDACTED] [REDACTED] Co-defendant(s)			Complaining Witness S/A CHARLES BRADLEY S/A MARK KACHAR	
City/Twp./Village DETROIT			Date: On or about 08/01/2011 - 01/30/2012	
County in Michigan WAYNE			Defendant DOB [REDACTED]	
Charge(s) See Below			Maximum Penalty See Below	

STATE OF MICHIGAN, COUNTY OF WAYNE

The complaining witness says that on the date above and at/or in the City of Detroit, the defendant, contrary to law,

COUNT 1: UNEMPLOYMENT COMPENSATION FRAUD - FALSE STATEMENT/MISREPRESENTATION - LOSS OF \$1,000 TO \$25,000

did make a false statement or representation knowing it to be false in order to obtain or increase a benefit or other payment under the Michigan Employment Security Act for himself, the amount improperly obtained, being \$1,000 or more but less than \$25,000; contrary to MCL 421.54(b)(3)(A). [421.54B(1A)]

MISDEMEANOR: 4 times the amount of fraud and 1 Year, or community service for up to 1 Year but not to exceed 2,080 hours, or a combination of Imprisonment and community service not to exceed 1 Year

The complaining witness asks that defendant be apprehended and dealt with according to law

Warrant authorized on 4-22-14 by: _____
Date
DMH

Denise M. Hart (P45127)
Assistant Attorney General
Michigan Department of Attorney Genera.
Criminal Division
3030 W. Grand Blvd. Cadillac Place, Suite 10-200
Detroit, MI 48202
313-456-0180

Security for costs posted

[Signature]
Complaining witness signature

Subscribed and sworn to before me on 4/24/14 Date

[Signature]
Judge/Magistrate/Clerk Bar no.

Exhibit G

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT		COMPLAINT MISDEMEANOR		DISTRICT: CIRCUIT: CTN: 96-1490053 4-01 MSP#: 1.00000000
District Court ORI: MI820365J		Circuit Court ORI: MI- MI821095J		AG ORI: MI820025A
THE PEOPLE OF THE STATE OF MICHIGAN v TODD DAMEON TAYLOR [REDACTED] [REDACTED] Co-defendant(s)			Victim or complainant STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY Complaining Witness S/A MARK KACHAR S/A CHARLES BRADLEY Date: On or about 07/01/2011 - 02/28/2012	
City/Twp./Village DETROIT	County in Michigan WAYNE	Defendant SID	Defendant DOB [REDACTED]	
Charge(s) See Below			Maximum Penalty See Below	

STATE OF MICHIGAN, COUNTY OF WAYNE

The complaining witness says that on the date above and at/or in the City of Detroit, the defendant, contrary to law,

COUNT 1: UNEMPLOYMENT COMPENSATION FRAUD - FALSE STATEMENT/MISREPRESENTATION - LOSS OF \$1,000 TO \$25,000

did make a false statement or representation knowing it to be false in order to obtain or increase a benefit or other payment under the Michigan Employment Security Act for himself, the amount improperly obtained, being \$1,000 or more but less than \$25,000; contrary to MCL 421.54(b)(ii)(A). [421.54BIIA]

MISDEMEANOR: 4 times the amount of fraud and 1 Year, or community service for up to 1 Year but not to exceed 2,080 hours, or a combination of imprisonment and community service not to exceed 1 Year

The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on 4/24/14 by:
Date
Denise M. Hart

Denise M. Hart (P45127)
Assistant Attorney General
Michigan Department of Attorney General
Criminal Division
3030 W. Grand Blvd. Cadillac Place, Suite 10-200
Detroit, MI 48202
313-456-0180

Security for costs posted

[Signature]
Complaining witness signature

Subscribed and sworn to before me on _____ Date

Judge/Magistrate/Clerk Bar no

Exhibit H

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT	COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 96-14900535-01 MSP#: 357
District Court ORI: MI820385J	Circuit Court ORI: MI- MI821095J	AG ORI: MI820825A
THE PEOPLE OF THE STATE OF MICHIGAN v SHARYCE YVONNE HUNT [REDACTED] [REDACTED] Co-defendant(s)		Victim or complainant: STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY Complaining Witness S/A CHARLES BRADLEY S/A MARK KACHAR
City/Twp./Village DETROIT	County in Michigan WAYNE	Defendant SID [REDACTED]
Charge(s) See Below	Date: On or about 02/01/2011 - 09/30/2011	Defendant DOB [REDACTED] Medium Penalty See Below

STATE OF MICHIGAN, COUNTY OF WAYNE

The complaining witness says that on the date above and at/or in the City of Detroit, the defendant, contrary to law,

COUNT 1: UNEMPLOYMENT COMPENSATION FRAUD - FALSE STATEMENT/MISREPRESENTATION - LOSS OF \$1,000 TO \$25,000

did make a false statement or representation knowing it to be false in order to obtain or increase a benefit or other payment under the Michigan Employment Security Act for herself, the amount improperly obtained, being \$1,000 or more but less than \$25,000; contrary to MCL 421.54(b)(ii)(A). [421.54BIIA]

MISDEMEANOR: 4 times the amount of fraud and 1 Year, or community service for up to 1 Year but not to exceed 2,080 hours, or a combination of imprisonment and community service not to exceed 1 Year

The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on <u>4-22-14</u> by: Date
<u>Denise M. Hart</u>
Denise M. Hart (P45127) Assistant Attorney General Michigan Department of Attorney General Criminal Division 3030 W. Grand Blvd. Cadillac Place, Suite 10-200 Detroit, MI 48202 313-458-0180 <input type="checkbox"/> Security for costs posted



 Complaining witness signature
Subscribed and sworn to before me on <u>4/24/14</u> Date
 Judge/Magistrate/Clerk
Bar no.

Exhibit I

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT	COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 98-14900533-01 MSP#:
District Court OR: MI820365J	Circuit Court OR: MI- MI821095J	AG OR: MI820025A- 000

THE PEOPLE OF THE STATE OF MICHIGAN		Victim or complainant
v		STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY
DEAN STORY		Complaining Witness S/A MARK KACHAR S/A CHARLES BRADLEY
[REDACTED]		Date: On or about 11/01/2010 - 09/30/2011
Co-defendant(s)		Defendant DOB [REDACTED]
City/Twp./Village DETROIT	County in Michigan WAYNE	Defendant SID
Charge(s) See Below		Maximum Penalty See Below

STATE OF MICHIGAN, COUNTY OF WAYNE
The complaining witness says that on the date above and at/or in the City of Detroit, the defendant, contrary to law,

COUNT 1: UNEMPLOYMENT COMPENSATION FRAUD - FALSE STATEMENT/MISREPRESENTATION - LOSS OF \$1,000 TO \$25,000
did make a false statement or representation knowing it to be false in order to obtain or increase a benefit or other payment under the Michigan Employment Security Act for himself, the amount improperly obtained, being \$1,000 or more but less than \$25,000; contrary to MCL 421.54(b)(ii)(A). [421.54BIIA]
MISDEMEANOR: 4 times the amount of fraud and 1 Year, or community service for up to 1 Year but not to exceed 2,080 hours, or a combination of imprisonment and community service not to exceed 1 Year

The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on <u>4-22-14</u> by:
Date <i>DM Hart</i>
Denise M. Hart (P45127) Assistant Attorney General Michigan Department of Attorney General Criminal Division, Criminal Division 3030 W. Grand Blvd. Cadillac Place, Suite 10-200 Detroit, MI 48202 313-456-0160
<input type="checkbox"/> Security for costs posted

[Signature]
Complaining witness signature

Subscribed and sworn to before me on 4/22/14 Date

[Signature]
Judge/Magistrate/Clerk

Bar no.

Exhibit J

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT	COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 96-14900557-01 MSP#: 11-6-2000
District Court ORI: MI820365J	Circuit Court ORI: MI- MI821095J	AG ORI: MI820025A 0 1

THE PEOPLE OF THE STATE OF MICHIGAN		Victim or complainant:
v		STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY
DAROLD WHITEHEAD [REDACTED]		Complaining Witness S/A MARK KACHAR S/A CHARLES BRADLEY
Co-defendant(s)		Date: On or about 01/01/2011 - 07/31/2012
City/Twp./Village DETROIT	County in Michigan WAYNE	Defendant SID [REDACTED]
Charge(s) See Below		Maximum Penalty See Below

STATE OF MICHIGAN, COUNTY OF WAYNE
The complaining witness says that on the date above and a/or in the City of Detroit, the defendant, contrary to law,
COUNT 1: UNEMPLOYMENT COMPENSATION FRAUD - FALSE STATEMENT/MISREPRESENTATION - LOSS OF \$1,000 TO \$25,000
did make a false statement or representation knowing it to be false in order to obtain or increase a benefit or other payment under the Michigan Employment Security Act for himself, the amount improperly obtained, being \$1,000 or more but less than \$25,000; contrary to MCL 421.54(b)(ii)(A). [421.54B(1A)]
MISDEMEANOR: 4 times the amount of fraud and 1 Year, or community service for up to 1 Year but not to exceed 2,080 hours, or a combination of imprisonment and community service not to exceed 1 Year

The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on 4-22-14 by: _____
Date
DMH

Denise M. Hart (P45127)
Assistant Attorney General
Michigan Department of Attorney General
Criminal Division
3030 W. Grand Blvd. Cadillac Place, Suite 10-200
Detroit, MI 48202
313-456-0180

Security for costs posted

[Signature]
Complaining witness signature

Subscribed and sworn to before me on 4/24/14 Date

[Signature]
Judge/Magistrate/Clerk Bar no

Exhibit K

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT		COMPLAINT MISDEMEANOR		DISTRICT: CIRCUIT: CTN: 96-14900559-01 MSP#: <u>11.050395</u>
District Court ORI: M1820365J		Circuit Court ORI: MI-M1821095J		AG ORI: M1820025A
THE PEOPLE OF THE STATE OF MICHIGAN			Victim or complainant: STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY	
v RONA ANITA WILSON XXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXXXXXX			Complaining Witness S/A MARK KACHAR S/A CHARLES BRADLEY	
Co-defendant(s)			Date: On or about 01/01/2011 - 05/21/2011	
City/Twp./Village DETROIT	County in Michigan WAYNE	Defendant SID XXXXXXXXXX		Defendant DOB XXXXXXXXXX
Charge(s) See Below		Maximum Penalty See Below		

STATE OF MICHIGAN, COUNTY OF WAYNE

The complaining witness says that on the date above and at/or in the City of Detroit, the defendant, contrary to law,

COUNT 1: UNEMPLOYMENT COMPENSATION FRAUD - FALSE STATEMENT/MISREPRESENTATION - LOSS OF \$1,000 TO \$25,000

did make a false statement or representation knowing it to be false in order to obtain or increase a benefit or other payment under the Michigan Employment Security Act for herself, the amount improperly obtained, being \$1,000 or more but less than \$25,000; contrary to MCL 421.54(b)(ii)(A). [421.54B1A]

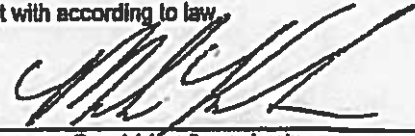
MISDEMEANOR: 4 times the amount of fraud and 1 Year, or community service for up to 1 Year but not to exceed 2,080 hours, or a combination of imprisonment and community service not to exceed 1 Year

The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on 4-22-14 by: _____
Date
Denise M. Hart


Denise M. Hart (P45127)
Assistant Attorney General
Michigan Department of Attorney General
Criminal Division
3030 W. Grand Blvd. Cadillac Place, Suite 10-200
Detroit, MI 48202
313-458-0180

Security for costs posted



Complaining witness signature _____

Subscribed and sworn to before me on 4-24-14 Date



Judge/Magistrate/Clerk _____ Bar no _____

Exhibit L

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT		COMPLAINT MISDEMEANOR		DISTRICT: CIRCUIT: CTN: 98-14900532-01 MSP#:
District Court ORI: MI820365J		Circuit Court ORI: MI- MI821095J		AG ORI: MI820026A 0 0 0 4
THE PEOPLE OF THE STATE OF MICHIGAN			Victim or complainant:	
v			STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY	
JOY ALEXIS PATILLO			Complaining Witness S/A CHARLES BRADLEY S/A MARK KACHAR	
Co-defendant(s)			Date: On or about 02/01/2011 - 01/31/2012	
City/Twp./Village DETROIT	County in Michigan WAYNE	Defendant SID		Defendant DOB
Charge(s) See Below			Maximum Penalty See Below	

STATE OF MICHIGAN, COUNTY OF WAYNE

The complaining witness says that on the date above and al/or in the City of Detroit, the defendant, contrary to law,

COUNT 1: UNEMPLOYMENT COMPENSATION FRAUD - FALSE STATEMENT/MISREPRESENTATION - LOSS OF \$1,000 TO \$25,000

did make a false statement or representation knowing it to be false in order to obtain or increase a benefit or other payment under the Michigan Employment Security Act for herself, the amount improperly obtained, being \$1,000 or more but less than \$25,000; contrary to MCL 421.54(b)(ii)(A). [421.54BIIA]

MISDEMEANOR: 4 times the amount of fraud and 1 Year, or community service for up to 1 Year but not to exceed 2,080 hours, or a combination of imprisonment and community service not to exceed 1 Year

The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on 4-22-14 by: _____
Date
Tom Hart

Denise M. Hart (P45127)
Assistant Attorney General
Michigan Department of Attorney General
Criminal Division
3030 W. Grand Blvd. Cadillac Place, Suite 10-200
Detroit, MI 48202
313-456-0180

Security for costs posted

[Signature]
Complaining witness signature

Subscribed and sworn to before me on 4/24/14 Date

[Signature]
Judge/Magistrate/Clerk Bar no.

Exhibit M

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT		COMPLAINT MISDEMEANOR		DISTRICT: CIRCUIT: CTN: 98-14900556-01 MSP#: 11850302
District Court ORI: MI820365J		Circuit Court ORI: MI-MI821095J		AG ORI: MI820025A 302
THE PEOPLE OF THE STATE OF MICHIGAN v DOMINIQUE SHANNARD ALSTON [REDACTED] [REDACTED]			Victim or complainant: STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY Complaining Witness S/A MARK KACHAR S/A CHARLES BRADLEY	
Co-defendant(s)			Date: On or about 01/30/2008 - 08/31/2012	
City/Twp./Village DETROIT	County in Michigan WAYNE	Defendant SID [REDACTED]		Defendant DOB [REDACTED]
Charge(s) See Below			Maximum Penalty See Below	

STATE OF MICHIGAN, COUNTY OF WAYNE

The complaining witness says that on the date above and at/or in the City of Detroit, the defendant, contrary to law,

COUNT 1: UNEMPLOYMENT COMPENSATION FRAUD - FALSE STATEMENT/MISREPRESENTATION - LOSS OF \$1,000 TO \$25,000

did make a false statement or representation knowing it to be false in order to obtain or increase a benefit or other payment under the Michigan Employment Security Act for himself, the amount improperly obtained, being \$1,000 or more but less than \$25,000; contrary to MCL 421.54(b)(ii)(A). [421.54B(1)(A)]

MISDEMEANOR: 4 times the amount of fraud and 1 Year, or community service for up to 1 Year but not to exceed 2,080 hours, or a combination of imprisonment and community service not to exceed 1 Year

The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on 4-22-14 by: _____
Date

DM Hart

Denise M. Hart (P45127)
Assistant Attorney General
Michigan Department of Attorney General
Criminal Division
3030 W. Grand Blvd. Cadillac Place, Suite 10-200
Detroit, MI 48202
313-456-0180

Security for costs posted

[Signature]
Complaining witness signature

Subscribed and sworn to before me on 4/24/14
Date

[Signature]
Judge/Magistrate/Clerk Bar no.

Exhibit N

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT	COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 96-14900547-01 MSP#: 058996
District Court ORI: MI820365J	Circuit Court ORI: MI- MI821095J	AG ORI: MI820025A

THE PEOPLE OF THE STATE OF MICHIGAN		Victim or complainant:
v		STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY
KENNETH FASHAWN ALSTON		Complaining Witness
		S/A MARK KACHAR S/A CHARLES BRADLEY
Co-defendant(s)		Date: On or about 08/01/2008 -09.30/2012
City/Twp./Village DETROIT	County in Michigan WAYNE	Defendant DOB
Charge(s) See Below		Maximum Penalty See Below

STATE OF MICHIGAN, COUNTY OF WAYNE
The complaining witness says that on the date above and at/or in the City of Detroit, the defendant, contrary to law,
COUNT 1: UNEMPLOYMENT COMPENSATION FRAUD - FALSE STATEMENT/MISREPRESENTATION - LOSS OF \$1,000 TO \$25,000
did make a false statement or representation knowing it to be false in order to obtain or increase a benefit or other payment under the Michigan Employment Security Act for himself, the amount improperly obtained, being \$1,000 or more but less than \$25,000; contrary to MCL 421.54(b)(1)(A). [421.54B1A]
MISDEMEANOR: 4 times the amount of fraud and 1 Year, or community service for up to 1 Year but not to exceed 2,080 hours, or a combination of imprisonment and community service not to exceed 1 Year

The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on 4-22-14 by: _____
Date
DM Hart

Denise M. Hart (P45127)
Assistant Attorney General
Michigan Department of Attorney General
Criminal Division
3030 W. Grand Blvd. Cadillac Place, Suite 10-200
Detroit, MI 48202
313-456-0180

Security for costs posted

[Signature]
Complaining witness signature

Subscribed and sworn to before me on 4/24/14
Date

[Signature] 55767
Judge/Magistrate/Clerk Bar no

Exhibit O

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT		COMPLAINT MISDEMEANOR		DISTRICT: CIRCUIT: CTN: 96-14900552-01 MSP#: <u>11050075</u>
District Court ORI: MI820365J		Circuit Court ORI: MI-MI821095J		AG ORI: MI820029A
THE PEOPLE OF THE STATE OF MICHIGAN				Victim or complainant:
v				STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY
MAMIE BROWN 12074 PIONEER STREET DETROIT, MI 48202				Complaining Witness S/A MARK KACHAR S/A CHARLES BRADLEY
Co-defendant(s)				Date: On or about 04/01/2009 - 09/30/2012
City/Twp./Village DETROIT	County in Michigan WAYNE	Defendant SID	Defendant DOB 01/15/1978	
Charge(s) See Below				Maximum Penalty See Below

STATE OF MICHIGAN, COUNTY OF WAYNE

The complaining witness says that on the date above and a/or in the City of Detroit, the defendant, contrary to law,

COUNT 1: UNEMPLOYMENT COMPENSATION FRAUD - FALSE STATEMENT/MISREPRESENTATION - LOSS OF \$1,000 TO \$25,000

did make a false statement or representation knowing it to be false in order to obtain or increase a benefit or other payment under the Michigan Employment Security Act for herself, the amount improperly obtained, being \$1,000 or more but less than \$25,000; contrary to MCL 421.54(b)(ii)(A). [421.54BIIA]

MISDEMEANOR: 4 times the amount of fraud and 1 Year, or community service for up to 1 Year but not to exceed 2,080 hours, or a combination of imprisonment and community service not to exceed 1 Year

The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on <u>A-22-14</u> by:
Date
<u>DMH</u>
Denise M. Hart (P45127) Assistant Attorney General Michigan Department of Attorney General Criminal Division 3030 W. Grand Blvd. Cadillac Place, Suite 10-200 Detroit, MI 48202 313-456-0180
<input type="checkbox"/> Security for costs posted

[Signature]
Complaining witness signature

Subscribed and sworn to before me on 4/24/14
Date

[Signature]
Judge/Magistrate/Clerk

Bar no. _____

Exhibit P

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT	COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 98-14900553-01 MSP#:
District Court ORI: MI820385J	Circuit Court ORI: MI- MI821095J	As of: MI820028AO

THE PEOPLE OF THE STATE OF MICHIGAN			Victim or complainant:
v			STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY
RANDALL, CHARLES GUY			Complaining Witness S/A MARK KACHAR S/A CHARLES BRADLEY
Co-defendant(s)			Date: On or about 01/01/2008 - 06/30/2012
City/Twp./Village DETROIT	County in Michigan WAYNE	Defendant SID	Defendant DOB
Charge(s) See Below			Maximum Penalty See Below

STATE OF MICHIGAN, COUNTY OF WAYNE

The complaining witness says that on the date above and at/or in the City of Detroit, the defendant, contrary to law,

COUNT 1: UNEMPLOYMENT COMPENSATION FRAUD - FALSE STATEMENT/MISREPRESENTATION - LOSS OF \$1,000 TO \$25,000

did make a false statement or representation knowing it to be false in order to obtain or increase a benefit or other payment under the Michigan Employment Security Act for himself, the amount improperly obtained, being \$1,000 or more but less than \$25,000; contrary to MCL 421.54(b)(1)(A). [421.54B(1)(A)]

MISDEMEANOR: 4 times the amount of fraud and 1 Year, or community service for up to 1 Year but not to exceed 2,080 hours, or a combination of imprisonment and community service not to exceed 1 Year

The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on <u>4-22-14</u> by:
Date
<u>Denise M. Hart</u>
Denise M. Hart (P45127) Assistant Attorney General Michigan Department of Attorney Criminal Division 3030 W. Grand Blvd. Cadillac Place, Suite 10-200 Detroit, MI 48202 313-456-0180
<input type="checkbox"/> Security for costs posted

[Signature]
Complaining witness signature

Subscribed and sworn to before me on 4/22/14
(Date)

[Signature]
Judge/Magistrate/Clerk Bar no.

Exhibit Q

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT	COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 98-14900529-01 MSP#: <u>163380</u>
District Court OR: MI820385J	Circuit Court OR: MI-MI821095J	AG OR: MI820025A

THE PEOPLE OF THE STATE OF MICHIGAN		Victim or complainant:
v		STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY
STARR ROCHELLE GUY [REDACTED] [REDACTED] Co-defendant(s)		Complaining Witness S/A CHARLES BRADLEY S/A MARK KACHAR
City/Twp./Village DETROIT		Date: On or about 10/01/2008 - 08/30/2011
County in Michigan WAYNE	Defendant SID [REDACTED]	Defendant DOB [REDACTED]
Charge(s) See Below		Maximum Penalty See Below

STATE OF MICHIGAN, COUNTY OF WAYNE
 The complaining witness says that on the date above and at/or in the City of Detroit, the defendant, contrary to law,
COUNT 1: UNEMPLOYMENT COMPENSATION FRAUD - FALSE STATEMENT/MISREPRESENTATION - LOSS OF \$1,000 TO \$25,000
 did make a false statement or representation knowing it to be false in order to obtain or increase a benefit or other payment under the Michigan Employment Security Act for herself, the amount improperly obtained, being \$1,000 or more but less than \$25,000; contrary to MCL 421.54(b)(ii)(A). [421.54BIIA]
MISDEMEANOR: 4 times the amount of fraud and 1 Year, or community service for up to 1 Year but not to exceed 2,080 hours, or a combination of imprisonment and community service not to exceed 1 Year

The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on 4-22-14 by: _____
 Date
 Denise M. Hart (P45127)
 Assistant Attorney General
 Michigan Department of Attorney General
 Criminal Division, Criminal Division
 3030 W. Grand Blvd. Cadillac Place, Suite 10-200
 Detroit, MI 48202
 313-456-0180
 Security for costs posted

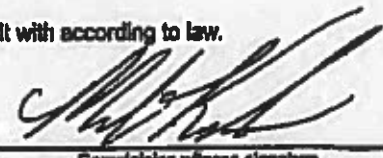
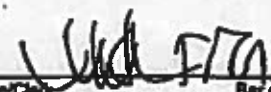

 Complaining witness signature
 Subscribed and sworn to before me on 4/14/14 (Date)

 Judge/Magistrate/Clerk Bar no.

Exhibit R

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT	COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 98-14900550-01 MSP#: <u>11058377</u>
District Court ORI: MI820365J	Circuit Court ORI: MI- MI821095J	AG ORI: MI820025A

THE PEOPLE OF THE STATE OF MICHIGAN		Victim or complainant: STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY
v DARIUS ANTWON-LEWIS MCGLORY XXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXXXXXX		Complaining Witness S/A MARK KACHAR S/A CHARLES BRADLEY
Co-defendant(s)		Date: On or about 10/31/2009 - 10/31/2012
City/Twp./Village DETROIT	County in Michigan WAYNE	Defendant SID XXXXXXXXXX
Charge(s) See Below		Defendant DOB XXXXXXXXXX
		Maximum Penalty See Below

STATE OF MICHIGAN, COUNTY OF WAYNE
The complaining witness says that on the date above and at/or in the City of Detroit, the defendant, contrary to law,
COUNT 1: UNEMPLOYMENT COMPENSATION FRAUD - FALSE STATEMENT/MISREPRESENTATION - LOSS OF \$1,000 TO \$25,000
did make a false statement or representation knowing it to be false in order to obtain or increase a benefit or other payment under the Michigan Employment Security Act for himself, the amount improperly obtained, being \$1,000 or more but less than \$25,000; contrary to MCL 421.54(b)(ii)(A). [421.54BIIA]
MISDEMEANOR: 4 times the amount of fraud and 1 Year, or community service for up to 1 Year but not to exceed 2,080 hours, or a combination of imprisonment and community service not to exceed 1 Year

The complaining witness asks that defendant be apprehended and dealt with according to law

Warrant authorized on 4-22-14 by: _____
Date
DM Hart

Denise M. Hart (P45127)
Assistant Attorney General
Michigan Department of Attorney General
Criminal Division
3030 W. Grand Blvd. Cadillac Place, Suite 10-200
Detroit, MI 48202
313-458-0180

Security for costs posted

[Signature]
Complaining witness signature

Subscribed and sworn to before me on 4-1 4/22/14
Date

[Signature]
Judge/Magistrate/Clerk Bar no.

Exhibit S

STATE OF MICHIGAN 38 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT		COMPLAINT MISDEMEANOR		DISTRICT: CIRCUIT: CTN: 98-1490055 1-01 MSP#:
District Court ORI: MI820385J		Circuit Court ORI: MI- MI821096J		AG ORI: MI820026A 11-20-2007
THE PEOPLE OF THE STATE OF MICHIGAN v JOSEPH MATTHEW QUINN XXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXXXXXX Co-defendant(s)			Victim or complainant STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY Complaining Witness S/A MARK KACHAR S/A CHARLES BRADLEY Date: On or about 08/01/2010 - 12/31/2012 Defendant DOB XXXXXXXXXX Maximum Penalty See Below	
City/Twp./Village DETROIT	County in Michigan WAYNE	Defendant SID		
Charge(s) See Below				

STATE OF MICHIGAN, COUNTY OF WAYNE

The complaining witness says that on the date above and at/or in the City of Detroit, the defendant, contrary to law,

COUNT 1: UNEMPLOYMENT COMPENSATION FRAUD - FALSE STATEMENT/MISREPRESENTATION - LOSS OF \$1,000 TO \$25,000

did make a false statement or representation knowing it to be false in order to obtain or increase a benefit or other payment under the Michigan Employment Security Act for himself, the amount improperly obtained, being \$1,000 or more but less than \$25,000; contrary to MCL 421.54(b)(ii)(A). [421.54B(1A)]

MISDEMEANOR: 4 times the amount of fraud and 1 Year, or community service for up to 1 Year but not to exceed 2,080 hours, or a combination of imprisonment and community service not to exceed 1 Year

The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on 4-22-14 by: _____
Date

DM Hart

Denise M. Hart (P45127)
Assistant Attorney General
Michigan Department of Attorney General
Criminal Division
3030 W. Grand Blvd. Cadillac Place, Suite 10-200
Detroit, MI 48202
313-458-0180

Security for costs posted

[Signature]
Complaining witness Signature

Subscribed and sworn to before me on 4/24/14 Date

[Signature]
Judge/Magistrate/Clerk

1567
Ser. no.

Exhibit T

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT	COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 96-14900554-01 MSP#: 14008372
District Court ORI: MI820365J	Circuit Court ORI: MI- MI821095J	AG ORI: MI820025A

THE PEOPLE OF THE STATE OF MICHIGAN		Victim or complainant:
v		STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY
ROMAND CLINY SMITH		Complaining Witness
[REDACTED]		S/A MARK KACHAR
[REDACTED]		S/A CHARLES BRADLEY
Co-defendant(s)		Date: On or about
		10/01/2007 - 08/30/2012
City/Twp./Village	County in Michigan	Defendant DOB
DETROIT	WAYNE	[REDACTED]
Charge(s)	Defendant SID	Maximum Penalty
See Below		See Below

STATE OF MICHIGAN, COUNTY OF WAYNE

The complaining witness says that on the date above and a/or in the City of Detroit, the defendant, contrary to law,

COUNT 1: UNEMPLOYMENT COMPENSATION FRAUD - FALSE STATEMENT/MISREPRESENTATION - LOSS OF \$1,000 TO \$25,000

did make a false statement or representation knowing it to be false in order to obtain or increase a benefit or other payment under the Michigan Employment Security Act for himself, the amount improperly obtained, being \$1,000 or more but less than \$25,000; contrary to MCL 421.54(b)(ii)(A). [421.54BIIA]

MISDEMEANOR: 4 times the amount of fraud and 1 Year, or community service for up to 1 Year but not to exceed 2,080 hours, or a combination of imprisonment and community service not to exceed 1 Year

The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on <u>4-22-14</u> by:
Date
<u>DM Hart</u>
Denise M. Hart (P45127) Assistant Attorney General Michigan Department of Attorney General Criminal Division 3030 W. Grand Blvd. Cadillac Place, Suite 10-200 Detroit, MI 48202 313-456-0180
<input type="checkbox"/> Security for costs posted

[Signature]
Complaining witness signature

Subscribed and sworn to before me on 4/22/14
(Date)

[Signature]
Judge/Magistrate/Clerk Bar no.

Exhibit U

STATE OF MICHIGAN 38 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT	WARRANT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 98-14900527-01 MSP#:
District Court ORI: MI820385J	Circuit Court ORI: MI- MI821095J	AG ORI: MI820025A 379

THE PEOPLE OF THE STATE OF MICHIGAN v TIA NAVE TUBBS XXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXXXXXX	Victim or complainant: STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY
---	--

Height:	Weight:	Hair Color:	Eye Color:	Race: Unknown	Sex: F	Complaining Witness S/A MARK KACHAR S/A CHARLES BRADLEY
City/Twp./Village DETROIT	County in Michigan WAYNE	Defendant SID	Date: On or about 04/01/2009 - 04/31/2012	Defendant DOB XXXXXXXXXX	Maximum Penalty See Below	
Charge(s) See Below						

STATE OF MICHIGAN, COUNTY OF WAYNE
To any peace officer or court officer authorized to make arrest: The complaining witness has filed a sworn complaint in this court stating:

COUNT 1: UNEMPLOYMENT COMPENSATION FRAUD - FALSE STATEMENT/MISREPRESENTATION - LOSS OF \$1,000 TO \$25,000
did make a false statement or representation knowing it to be false in order to obtain or increase a benefit or other payment under the Michigan Employment Security Act for herself, the amount improperly obtained, being \$1,000 or more but less than \$25,000; contrary to MCL 421.54(b)(II)(A). [421.54BIIA]
MISDEMEANOR: 4 times the amount of fraud and 1 Year, or community service for up to 1 Year but not to exceed 2,080 hours, or a combination of imprisonment and community service not to exceed 1 Year

Upon examination of the complaining witness, I find that the offense(s) charged has/have been committed and that there is probable cause to believe that defendant committed the offense(s). THEREFORE, IN THE NAME OF THE PEOPLE OF THE STATE OF MICHIGAN, I order you to arrest and bring defendant before the 38 District Court immediately.

The defendant may be released before arraignment if \$ _____ is posted as interim bail
by _____
Date

Date 4/24/14 (SEAL) [Signature] Judge/Magistrate Bar no. _____

Exhibit V

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT		COMPLAINT MISDEMEANOR		DISTRICT: CIRCUIT: CTN: 96-14900530-01 MSP#:	
District Court ORI: MI820365J		Circuit Court ORI: MI- MI821095J		AG ORI- MI820026A 14050303	
THE PEOPLE OF THE STATE OF MICHIGAN				Victim or complainant:	
v				STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY	
JUSTIN VIRGIL-JONATHAN WALKER [REDACTED] [REDACTED]				Complaining Witness S/A CHARLES BRADLEY S/A MARK KACHAR	
Co-defendant(s)				Date: On or about 10/01/2007 - 02/29/2013	
City/Twp./Village DETROIT	County in Michigan WAYNE	Defendant SID		Defendant DOB [REDACTED]	
Charge(s) See Below				Maximum Penalty See Below	

STATE OF MICHIGAN, COUNTY OF WAYNE

The complaining witness says that on the date above and a/or in the City of Detroit, the defendant, contrary to law,

COUNT 1: UNEMPLOYMENT COMPENSATION FRAUD - FALSE STATEMENT/MISREPRESENTATION - LOSS OF \$1,000 TO \$25,000

did make a false statement or representation knowing it to be false in order to obtain or increase a benefit or other payment under the Michigan Employment Security Act for himself, the amount improperly obtained, being \$1,000 or more but less than \$25,000; contrary to MCL 421.54(b)(ii)(A). [421.54BIIA]

MISDEMEANOR: 4 times the amount of fraud and 1 Year, or community service for up to 1 Year but not to exceed 2,080 hours, or a combination of imprisonment and community service not to exceed 1 Year

The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on 4-22-2014 by: _____
Date

Denise M. Hart
Denise M. Hart (P45127)
Assistant Attorney General
Michigan Department of Attorney General
Criminal Division
3030 W. Grand Blvd. Cadillac Place, Suite 10-200
Detroit, MI 48202
313-458-0180

Security for costs posted

[Signature]
Complaining witness signature

Subscribed and sworn to before me on 4/14/14 Date

[Signature]
Judge/Magistrate/Clerk Bar no.

Exhibit W

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT		COMPLAINT MISDEMEANOR		DISTRICT: CIRCUIT: CTN: 98-14900549-01 MSP#: 10000070
District Court ORI: MI820365J		Circuit Court ORI: MI- MI821096J		AG ORI: MI829025A 70
THE PEOPLE OF THE STATE OF MICHIGAN v AISHA DELANE WILLIAMS [REDACTED] [REDACTED] Co-defendant(s)			Victim or complainant: STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY Complaining Witness S/A CHARLES BRADLEY S/A MARK KACHAR	
City/Twp./Village DETROIT		County in Michigan WAYNE	Defendant SID	Date: On or about 02/28/2009 - 07/31/2012
Charge(s) See Below				Defendant DOB [REDACTED]
				Maximum Penalty See Below

STATE OF MICHIGAN, COUNTY OF WAYNE

The complaining witness says that on the date above and at/or in the City of Detroit, the defendant, contrary to law,

COUNT 1: UNEMPLOYMENT COMPENSATION FRAUD - FALSE STATEMENT/MISREPRESENTATION - LOSS OF \$1,000 TO \$25,000

did make a false statement or representation knowing it to be false in order to obtain or increase a benefit or other payment under the Michigan Employment Security Act for herself, the amount improperly obtained, being \$1,000 or more but less than \$25,000, contrary to MCL 421.54(b)(II)(A). [421.54BIIA]

MISDEMEANOR: 4 times the amount of fraud and 1 Year, or community service for up to 1 Year but not to exceed 2,080 hours, or a combination of imprisonment and community service not to exceed 1 Year

The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on 4-22-14 by: _____
Date

Denise M. Hart

Denise M. Hart (P45127)
Assistant Attorney General
Michigan Department of Attorney General
Criminal Division
3030 W. Grand Blvd. Cadillac Place, Suite 10-200
Detroit, MI 48202
313-456-0180

Security for costs posted

[Signature]
Complaining witness signature

Subscribed and sworn to before me on 4/24/14
Date

[Signature]
Judge/Magistrate/Clerk

Bar no. _____

Exhibit X

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT	COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 98-14900528-01 MSP#: 11050000
District Court ORI: MI820365J	Circuit Court ORI: MI- MI821095J	AG ORI: MI820025A

THE PEOPLE OF THE STATE OF MICHIGAN		Victim or complainant:
v		STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY
DAMIEN WILLIAMS [REDACTED] [REDACTED] [REDACTED] Co-defendant(s)		Complaining Witness S/A CHARLES BRADLEY S/A MARK KACHAR
City/Twp./Village DETROIT		Date: On or about 07/01/2011 - 02/28/2012
County in Michigan WAYNE	Defendant SID	Defendant DOB
Charge(s) See Below		Maximum Penalty See Below

STATE OF MICHIGAN, COUNTY OF WAYNE
The complaining witness says that on the date above and a/or in the City of Detroit, the defendant, contrary to law,
COUNT 1: UNEMPLOYMENT COMPENSATION FRAUD - FALSE STATEMENT/MISREPRESENTATION - LOSS OF \$1,000 TO \$25,000
did make a false statement or representation knowing it to be false in order to obtain or increase a benefit or other payment under the Michigan Employment Security Act for himself, the amount improperly obtained, being \$1,000 or more but less than \$25,000; contrary to MCL 421.54(b)(ii)(A). (421.54B1A)
MISDEMEANOR: 4 times the amount of fraud and 1 Year, or community service for up to 1 Year but not to exceed 2,080 hours, or a combination of imprisonment and community service not to exceed 1 Year

The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on 4-22-14 by: _____
Date
DMA
Denise M. Hart (P45127)
Assistant Attorney General
Michigan Department of Attorney General
Criminal Division
3030 W. Grand Blvd. Cadillac Place, Suite 10-200
Detroit, MI 48202
313-458-0180
 Security for costs posted

Complaining witness signature
Subscribed and sworn to before me on 4/22/14
Date

Judge/Magistrate/Clerk
Bar no.

Exhibit Y

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT		COMPLAINT MISDEMEANOR		DISTRICT: CIRCUIT: CTN: 96-14900571-01 MSP#: 11.058131
District Court ORI: MI820365J		Circuit Court ORI MI- MI821095J		AG ORI: MI820025A
THE PEOPLE OF THE STATE OF MICHIGAN v TANYA RENEE WOODS [REDACTED] GROSSE POINTE WOODS, MI 48236 Co-defendant(s)			Victim or complainant: STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY	
City/Twp./Village DETROIT			Complaining Witness S/A MARK KACHAR S/A CHARLES BRADLEY	
County in Michigan WAYNE			Date: On or about 04/01/2011 - 01/30/2012	
Defendant SID			Defendant DOB [REDACTED]	
Charge(s) See Below			Maximum Penalty See Below	

STATE OF MICHIGAN, COUNTY OF WAYNE

The complaining witness says that on the date above and at/or in the City of Detroit, the defendant, contrary to law,

COUNT 1: UNEMPLOYMENT COMPENSATION FRAUD - FALSE STATEMENT/MISREPRESENTATION - LOSS OF \$1,000 TO \$25,000

did make a false statement or representation knowing it to be false in order to obtain or increase a benefit or other payment under the Michigan Employment Security Act for herself, the amount improperly obtained, being \$1,000 or more but less than \$25,000; contrary to MCL 421.54(b)(ii)(A). [421.54BIIA]

MISDEMEANOR: 4 times the amount of fraud and 1 Year, or community service for up to 1 Year but not to exceed 2,080 hours, or a combination of imprisonment and community service not to exceed 1 Year

The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on 4/24/14 by: _____
Date
Denise M. Hart

Denise M. Hart (P45127)
Assistant Attorney General
Michigan Department of Attorney General
Criminal Division
3030 W. Grand Blvd. Cadillac Place, Suite 10-200
Detroit, MI 48202
313-456-0180

Security for costs posted

[Signature]
Complaining witness signature

Subscribed and sworn to before me on _____ Date

[Signature]
Judge/Magistrate/Clerk Bar no. _____

Exhibit Z

STATE OF MICHIGAN 38 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT	COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 88-14900587-01 MSP#: 11673399
District Court ORI: MI820385J	Circuit Court ORI MI- MI821095J	AG ORI: MI820025A 59

THE PEOPLE OF THE STATE OF MICHIGAN		Victim or complainant: STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY
v		Complaining Witness S/A CHARLES BRADLEY S/A MARK KACHAR
ROSALIND KAY MILLS [REDACTED] [REDACTED] Co-defendant(s)		Date. On or about 11/01/2007 - 09/30/2012
City/Twp./Village DETROIT	County in Michigan WAYNE	Defendant DOB [REDACTED]
Charge(s) See Below	Defendant STD	Maximum Penalty See Below

STATE OF MICHIGAN, COUNTY OF WAYNE

The complaining witness says that on the date above and at/or in the City of Detroit, the defendant, contrary to law,

COUNT 1: UNEMPLOYMENT COMPENSATION FRAUD - FALSE STATEMENT/MISREPRESENTATION - LOSS OF \$1,000 TO \$25,000

did make a false statement or representation knowing it to be false in order to obtain or increase a benefit or other payment under the Michigan Employment Security Act for herself, the amount improperly obtained, being \$1,000 or more but less than \$25,000; contrary to MCL 421.54(b)(ii)(A). [421.54B1A]

MISDEMEANOR: 4 times the amount of fraud and 1 Year, or community service for up to 1 Year but not to exceed 2,080 hours, or a combination of imprisonment and community service not to exceed 1 Year

The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on <u>4/24/14</u> by _____ Date <i>DMH/law</i>
Danise M. Hart (P45127) Assistant Attorney General Michigan Department of Attorney General Criminal Division 3030 W. Grand Blvd. Cadillac Plaza, Suite 10-200 Detroit, MI 48202 313-456-0180 <input type="checkbox"/> Security for costs posted

[Signature]
Complaining witness signature

Subscribed and sworn to before me on 4/24/14
Date

[Signature]
Judge/Magistrate/Clerk Bar no.

Exhibit AA

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT		COMPLAINT MISDEMEANOR		DISTRICT: CIRCUIT: CTN: 96-14900574-01 MSP#: 10000000
District Court ORI: MI820365J		Circuit Court ORI: MI- MI821095J		AG ORI: MI820025A
THE PEOPLE OF THE STATE OF MICHIGAN v SHAYLA LINDSEY BLACK [REDACTED] [REDACTED] Co-defendant(s)			Victim or complainant: STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY Complaining Witness S/A MARK KACHAR S/A CHARLES BRADLEY	
City/Twp./Village DETROIT		County in Michigan WAYNE	Defendant SID	Date On or about 01/30/2011 - 09/30/2012
Charge(s) See Below		Defendant DOB [REDACTED]		Maximum Penalty See Below

STATE OF MICHIGAN, COUNTY OF WAYNE

The complaining witness says that on the date above and a/or in the City of Detroit, the defendant, contrary to law,

COUNT 1: UNEMPLOYMENT COMPENSATION FRAUD - FALSE STATEMENT/MISREPRESENTATION - LOSS OF \$1,000 TO \$25,000

did make a false statement or representation knowing it to be false in order to obtain or increase a benefit or other payment under the Michigan Employment Security Act for herself, the amount improperly obtained, being \$1,000 or more but less than \$25,000; contrary to MCL 421.54(b)(ii)(A). [421.54BIIA]

MISDEMEANOR: 4 times the amount of fraud and 1 Year, or community service for up to 1 Year but not to exceed 2,080 hours, or a combination of imprisonment and community service not to exceed 1 Year

The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on 4/24/14 by: DMH

Date

Denise M. Hart (P45127)
Assistant Attorney General
Michigan Department of Attorney General
Criminal Division
3030 W. Grand Blvd. Cadillac Place, Suite 10-200
Detroit, MI 48202
313-456-0180

Security for costs posted

[Signature]
Complaining witness signature

Subscribed and sworn to before me on _____ Date

[Signature]
Judge/Magistrate/Clerk

Bar no. _____

Exhibit AB

STATE OF MICHIGAN 38 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT	COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 96-14900565-01 MSP#: 14038400
District Court ORI: MI820365J	Circuit Court ORI: MI- MI821095J	AG ORI: MI820025A

THE PEOPLE OF THE STATE OF MICHIGAN		Victim or complainant
v		STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY
GAMMIE CALVIN RUCKER [REDACTED]		Complaining Witness S/A MARK KACHAR S/A CHARLES BRADLEY
Co-defendant(s)		Date: On or about 04/01/2009 -07/31/2012
City/Twp./Village DETROIT	County in Michigan WAYNE	Defendant SID
Charge(s) See Below		Defendant DOB [REDACTED]
		Maximum Penalty See Below

STATE OF MICHIGAN, COUNTY OF WAYNE

The complaining witness says that on the date above and at/or in the City of Detroit, the defendant, contrary to law,

COUNT 1: UNEMPLOYMENT COMPENSATION FRAUD - FALSE STATEMENT/MISREPRESENTATION - LOSS OF \$1,000 TO \$25,000

did make a false statement or representation knowing it to be false in order to obtain or increase a benefit or other payment under the Michigan Employment Security Act for himself, the amount improperly obtained, being \$1,000 or more but less than \$25,000; contrary to MCL 421.54(b)(ii)(A). [421.54BIIA]

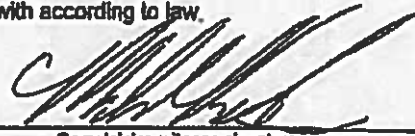
MISDEMEANOR: 4 times the amount of fraud and 1 Year, or community service for up to 1 Year but not to exceed 2,080 hours, or a combination of imprisonment and community service not to exceed 1 Year

The complaining witness asks that defendant be apprehended and dealt with according to law.

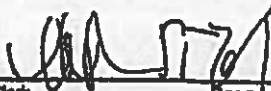
Warrant authorized on 4/24/14 by: _____
Date MAH

Denise M. Hart (P45127)
Assistant Attorney General
Michigan Department of Attorney General
Criminal Division
3030 W. Grand Blvd. Cadillac Place, Suite 10-200
Detroit, MI 48202
313-458-0180

Security for costs posted


Complaining witness signature

Subscribed and sworn to before me on 4/24/14 Date


Judge/Magistrate/Clerk

Bar no _____

Exhibit AC

STATE OF MICHIGAN 38 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT		COMPLAINT MISDEMEANOR		DISTRICT: CIRCUIT: CTN: 96-14900575-01 MSP#:	
District Court ORI: MI820365J		Circuit Court ORI: MI- MI821095J		AG ORI: MJ820025A 33	
THE PEOPLE OF THE STATE OF MICHIGAN v LASEAN LAVAYE MCCARY-BRANTLEY [REDACTED] [REDACTED] [REDACTED] Co-defendant(s)				Victim or complainant: STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY	
				Complaining Witness S/A MARK KACHAR S/A CHARLES BRADLEY	
				Date: On or about 12/01/2011 - 08/31/2012	
City/Twp./Village DETROIT		County in Michigan WAYNE		Defendant SID [REDACTED]	
Charge(s) See Below				Maximum Penalty See Below	

STATE OF MICHIGAN, COUNTY OF WAYNE

The complaining witness says that on the date above and at/or in the City of Detroit, the defendant, contrary to law,

COUNT 1: UNEMPLOYMENT COMPENSATION FRAUD - FALSE STATEMENT/MISREPRESENTATION - LOSS OF \$1,000 TO \$25,000
 did make a false statement or representation knowing it to be false in order to obtain or increase a benefit or other payment under the Michigan Employment Security Act for herself, the amount improperly obtained, being \$1,000 or more but less than \$25,000; contrary to MCL 421.54(b)(ii)(A). [421.54BIIA]
MISDEMEANOR: 4 times the amount of fraud and 1 Year, or community service for up to 1 Year but not to exceed 2,080 hours, or a combination of imprisonment and community service not to exceed 1 Year

The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on <u>4/24/14</u> by:
Date <u>[Signature]</u>
Denise M. Hart (P45127) Assistant Attorney General Michigan Department of Attorney General Criminal Division 3030 W. Grand Blvd. Cadillac Place, Suite 10-200 Detroit, MI 48202 313-458-0180
<input type="checkbox"/> Security for costs posted

[Signature]
Complaining witness signature

Subscribed and sworn to before me on _____ Date

[Signature]
Judge/Magistrate/Clerk Bar no.

Exhibit AD

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT		COMPLAINT MISDEMEANOR		DISTRICT: CIRCUIT: CTN: 96-14900573-01 MSP#:
District Court ORI: MI820385J		Circuit Court ORI: MI- MI821095J		AG ORI: MI820025A <u>000000</u>
THE PEOPLE OF THE STATE OF MICHIGAN			Victim or complainant:	
v			STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY	
MARK ALAN JACKSON XXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXXXXXX Co-defendant(s)			Complaining Witness S/A CHARLES BRADLEY S/A MARK KACHAR	
City/Twp./Village	County in Michigan	Defendant SID	Date: On or about	
DETROIT	WAYNE		01/01/2010 - 06/30/2012	
Charge(s)			Defendant DOB	
See Below			XXXXXXXXXX	
			Minimum Penalty	
			See Below	

STATE OF MICHIGAN, COUNTY OF WAYNE
The complaining witness says that on the date above and a/or in the City of Detroit, the defendant, contrary to law,
COUNT 1: UNEMPLOYMENT COMPENSATION FRAUD - FALSE STATEMENT/MISREPRESENTATION - LOSS OF \$1,000 TO \$25,000
did make a false statement or representation knowing it to be false in order to obtain or increase a benefit or other payment under the Michigan Employment Security Act for himself, the amount improperly obtained, being \$1,000 or more but less than \$25,000; contrary to MCL 421.54(b)(ii)(A). [421.54BIIA]
MISDEMEANOR: 4 times the amount of fraud and 1 Year, or community service for up to 1 Year but not to exceed 2,080 hours, or a combination of imprisonment and community service not to exceed 1 Year

The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on 4/24/14 by: _____
Date
DMH

Denise M. Hart (P45127)
Assistant Attorney General
Michigan Department of Attorney General
Criminal Division
3030 W. Grand Blvd. Cadillac Place, Suite 10-200
Detroit, MI 48202
313-458-0180
 Security for costs posted

[Signature]
Complaining witness signature

Subscribed and sworn to before me on 4/24/14
Date

[Signature]
Judge/Magistrate/Clerk Bar no. _____

Exhibit AE

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT	COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 86-14900589-01 MSP#:
District Court ORI: MI820385J	Circuit Court ORI: MI- MI821095J	AG ORI: MI820025A : 433432

THE PEOPLE OF THE STATE OF MICHIGAN

v

~~JUANITA ELAINE AUSTIN-JACKSON~~
~~12345 N. BROADWAY STREET~~
~~DETROIT, MI 48202~~

Co-defendant(s)

City/Twp./Village DETROIT	County in Michigan WAYNE	Defendant SID
Charge(s) See Below		

Victim or complainant:
**STATE OF MICHIGAN
UNEMPLOYMENT INS AGENCY**

Complaining Witness
**S/A CHARLES BRADLEY
S/A MARK KACHAR**

Date: On or about
12/01/2010 - 12/31/2011

Defendant DOB
~~12/12/1988~~
Maximum Penalty
See Below

STATE OF MICHIGAN, COUNTY OF WAYNE

The complaining witness says that on the date above and at/or in the City of Detroit, the defendant, contrary to law,

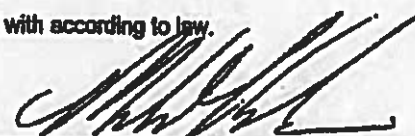
COUNT 1: UNEMPLOYMENT COMPENSATION FRAUD - FALSE STATEMENT/MISREPRESENTATION - LOSS OF \$1,000 TO \$25,000

did make a false statement or representation knowing it to be false in order to obtain or increase a benefit or other payment under the Michigan Employment Security Act for herself, the amount improperly obtained, being \$1,000 or more but less than \$25,000; contrary to MCL 421.54(b)(ii)(A). [421.54B1A]

MISDEMEANOR: 4 times the amount of fraud and 1 Year, or community service for up to 1 Year but not to exceed 2,080 hours, or a combination of imprisonment and community service not to exceed 1 Year

The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on <u>4/24/14</u> by: Date <u>DMH</u>
Denise M. Hart (P45127) Assistant Attorney General Michigan Department of Attorney General Criminal Division 3030 W. Grand Blvd. Cadillac Place, Suite 10-200 Detroit, MI 48202 313-458-0180 <input type="checkbox"/> Security for costs posted


Complaining witness signature

Subscribed and sworn to before me on 4/24/14
Date

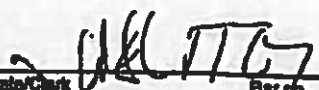

Judge/Magistrate/Clerk Bar no.

Exhibit AF

STATE OF MICHIGAN

2014717963

38TH DISTRICT COURT DETROIT
3rd Judicial Circuit

COMPLAINT
FELONY

CASE NO: 2014717963

The People of the State of Michigan

Offense Information
Police Agency / Report No. 14062799
82DPIA IA-PI 14-23
Date of Offense
05/12/2014
Place of Offense
8449 GRINNELL, DETROIT
Complainant or Victim
CITY OF DETROIT
Complaining Witness
INFO & BELIEF

vs

RUDOLPH WASHINGTON 82-14717963-01

STATE OF MICHIGAN, COUNTY OF WAYNE

The complaining witness says that on the date and the location stated above, the defendant, contrary to law,

COUNT 1: EMBEZZLEMENT - \$1,000.00 OR MORE BUT LESS THAN \$20,000.00 FROM A NON-PROFIT OR CHARITABLE ORGANIZATION

being an agent, servant, or employee of City of Detroit Public Lighting Dept, a non-profit corporation or charitable organization, did convert to his/her own use and/or take or secrete with intent to convert to his/her own use, without the consent of his/her principal, a Mastercard credit card, money, or personal property of his/her principal, having a value of more than \$1,000.00 but less than \$20,000.00, that came into the defendant's possession or under the defendant's charge or control by virtue of his/her relationship with the principal; contrary to MCL 750.174(5)(c). [750.1745C]

FELONY: 10 Years and/or \$15,000.00, or 3 times the amount embezzled, 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)

COUNT 2: LARCENY BY CONVERSION - \$1,000.00 OR MORE BUT LESS THAN \$20,000.00

did, being a person to whom GE Street Lamp Luminaries (8) and four foot fluorescent light bulbs (86) had been delivered, embezzle or fraudulently convert to his/her own use and/or secrete with intent to embezzle that property, which belonged to City of Detroit Public Lighting Dept, the value of the property was \$1,000.00 or more but less than \$20,000.00; contrary to MCL 750.362. [750.3623A]

FELONY: 5 Years and/or \$10,000.00, or 3 times the value of the property stolen, whichever is greater (see MCL 750.356(3)(a)) 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)

COUNT 3: LARCENY - \$1,000.00 OR MORE BUT LESS THAN \$20,000.00

did commit the offense of larceny by stealing GE Street Lamp Luminaries (8) and four foot fluorescent light bulbs (86) , that belonged to City of Detroit Public Lighting Dept, the value of the property stolen was \$1,000.00 or more but less than \$20,000.00; contrary to MCL 750.356(3)(a). [750.3563A]

FELONY: 5 Years and/or \$10,000.00, or 3 times value of property stolen, 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)

COUNT 4: STOLEN PROPERTY - RECEIVING AND CONCEALING - \$1,000.00 OR MORE BUT LESS THAN \$20,000.00

did buy, receive, possess, conceal, or aid in the concealment of GE Street Lamp Luminaries (8) and four foot fluorescent light bulbs (86) , stolen, embezzled, or converted property, knowing or having reason to know or reason to believe that the property was stolen, embezzled, or converted, and the value of the property was \$1,000.00 or more but less than \$20,000.00; contrary to MCL 750.535(3)(a). [750.5353A]

FELONY: 5 Years and/or \$10,000.00 or 3 times the value of the property, 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)

COUNT 5: STOLEN PROPERTY - RECEIVING AND CONCEALING - \$1,000.00 OR MORE BUT LESS THAN \$20,000.00

did buy, receive, possess, conceal, or aid in the concealment of various items purchased with Mastercard ending with 70-254, stolen, embezzled, or converted property, knowing or having reason to know or reason to believe that the property was stolen, embezzled, or converted, and the value of the property was \$1,000.00 or more but less than \$20,000.00; contrary to MCL 750.535(3)(a). [750.5353A]

FELONY: 5 Years and/or \$10,000.00 or 3 times the value of the property, 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)

COUNT 6: LARCENY IN A BUILDING

did, commit the crime of larceny in a an office, located at 8449 Grinnel, Detroit by stealing a Mastercard credit card; contrary to MCL 750.360. [750.360]

FELONY: 4 Years and/or \$5,000.00

COUNT 7: FINANCIAL TRANSACTION DEVICE - STEALING/RETAINING WITHOUT CONSENT

did, steal, knowingly take or knowingly remove a financial transaction device from City of Detroit Public Lighting Dept, the deviceholder and/or knowingly retain, knowingly possess, knowingly secrete or knowingly use a financial transaction device without the consent of City of Detroit Public Lighting Dept, the deviceholder; contrary to MCL 750.157n(1). [750.157N1]

FELONY: 4 Years and/or \$5,000.00

COUNT 8: FINANCIAL TRANSACTION DEVICE - ILLEGAL SALE/USE

did, use a financial transaction device knowing the device to have been obtained or held under circumstances proscribed under MCL 750.157n and/or 750.157p; contrary to MCL 750.157q. [750.157Q]

FELONY: 4 Years and/or \$5,000.00

COUNT 9: FINANCIAL TRANSACTION DEVICE - POSSESSION

did, have in possession, or under control, or receive from another person, a financial transaction device issued by Mastercard and/or Comerica Park, with the intent to use, deliver, circulate or sell the same, or to permit, cause or procure the same to be used, delivered, circulated or sold, knowing such possession, control or receipt to be without consent of the deviceholder; contrary to MCL 750.157p. [750.157P]

FELONY: 4 Years and/or \$5,000.00

Upon conviction of a felony or an attempted felony court shall order law enforcement to collect DNA identification profiling samples.

The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on <u>9/9/14</u> by:
<u>[Signature]</u> Date
Kelly Marsh Casper P89012

[Signature]
Complaining witness signature

Subscribed and sworn to before me on 9/9/14
Date

[Signature]
Judge/Magistrate/Clerk

P559728
Ser no.

13f