# City of Detroit Office of Inspector General 2014 2<sup>nd</sup> Quarter Report

(April 1, 2014 – June 30, 2014)



October 27, 2014

# **Office of Inspector General Complaints**

The OIG received a total of 208 complaints during the 2<sup>nd</sup> Quarter of 2014.

# Office of Inspector General Initiated Cases

The OIG initiated 169 investigations in the 2<sup>nd</sup> Quarter. The investigations involved 19 different departments or agencies. As the chart below shows, the Human Resources Department had a much higher number of cases initiated than any other department or agency. The reason for this is that the Human Resources Department is currently cooperating with the OIG and the State of Michigan in an ongoing investigation into widespread unemployment insurance fraud. The numbers associated with the Human Resources Department should not be construed as an indication of a continuing problem within the department, but rather as evidence of their partnership in the effort.

Department/Agency	# of Investigations
Human Resources	140
Public Lighting	2
Recreation	1
Mayor's Office	1
DWSD	5
Board of Police Commissioners	1
BSEED	2
Detroit Animal Control	2
Fire Department	3
Retirement System	3
Planning & Development	1
Police Department	1
Office of Inspector General	1
Finance Department	1
Transportation	1
Department of Elections	1
Cable Commission	1
Outside Agency	1
Office of the Emergency Manager	1
Total	169

# Office of Inspector General Closed Cases

A case is considered closed once an OIG file manager completes their investigation and the Inspector General approves a finding. The OIG closed 47 cases during the 2<sup>nd</sup> Quarter. The following is a brief summary of those cases.

## 2012-010

Complainant is the owner of a towing company authorized to provide services for the Detroit Police Department. The complainant alleged that City of Detroit public servants engaged in abusive conduct by preventing his company from receiving its fair share of towing opportunities. The OIG found no evidence supporting complainant's allegations.

#### 2013-019

Complainant alleged a home repair contractor who performed services through the Senior Emergency Repair Program administered by the Planning and Development Department did not properly complete repairs at the complainant's home. The OIG investigated the claims in cooperation with the Planning and Development Department. The repairs were in accordance with program standards. Nonetheless, the department agreed to have another contractor make changes in order to satisfy the complainant.

## 2013-DW-0037

Complainant alleged that the Detroit Police Department had engaged in an inadequate bid process for a new computer aided dispatch system. The OIG found no specific procurement violations.

## 2013-DW-0042

Complainant alleged that the Detroit Building Authority abused its authority when it improperly cancelled complainant's contract to provide moving services for the Detroit Police Department. The OIG closed the case after determining that the cancellation was not the result of fraud, abuse, waste, or corruption.

# 2013-DF-0054

Complainant alleged that the Detroit Water and Sewerage Department conducted a bid opening improperly. The OIG reviewed applicable documents and interviewed DWSD and Purchasing Department officials and found no evidence to substantiate the allegation.

## 2013-DA-0066

Complainant alleged that Buildings, Safety Engineering and Environmental Department inspectors were abusing their authority by unfairly ticketing a local business owner as retaliation for lodging a complaint with the OIG. The OIG was not able to substantiate the allegation.

# 2013-CA-0074

Complainant alleged a contractor double-billed the Detroit Water and Sewerage Department for hours he claimed to have worked on behalf of the department. The OIG found no evidence supporting the allegation.

## 2013-NA-0081

Complainant alleged that public servants in the Department of Public Works abused their authority by improperly denying complainant the ability to take time off under the Family Medical Leave Act. The OIG found no evidence supporting the complainant's allegations.

## 2014-DC-0003

Complainant alleged that public servants in the Buildings, Safety Engineering and Environmental Department abused their authority by improperly disposing of certain building plans and permits. The OIG found no evidence that documents were destroyed in violation of applicable law.

#### 2014-DA-0005

Complainant alleged that she was not evaluated fairly for an open position in the Finance Department-Assessment Division due to departmental abuse. The OIG found no evidence supporting complainant's allegations.

# 2014-DA-0006

The OIG opened an investigation into Detroit City Council President Pro Tem George Cushingberry's actions during a traffic stop by the Detroit Police Department. The investigation focused on whether the councilman abused his authority during his interaction with the police. The OIG determined that there was insufficient evidence to conclude that Councilman Cushingberry abused his authority. (Exhibit A)

#### 2014-DA-0019

Complainant alleged that a City of Detroit public servant made inappropriate sexual advances toward her while she attempted to transact business at a city department. The complainant made her initial complaint through a third party and was unwilling to personally come forward. She eventually requested that the complaint be withdrawn.

## 2014-DA-0023

Complainant alleged that Detroit Animal Control was not following its objectives as described by city ordinance. This included not having a veterinarian on staff and not caring for the health and welfare of animals captured or entrusted to its custody. The OIG found no evidence supporting complainant's allegations.

#### 2014-DA-0028

Complaint alleged that an active Detroit Police Department public servant abused his authority by improperly using his position to promote a private business. The OIG concluded that an abuse occurred and forwarded the matter to the Office of Chief Investigator.

# 2014-NA-0029

Complainant was concerned that a travel reimbursement check made out to her had been fraudulently received and cashed. Since the complainant was an OIG employee, the Inspector General referred the complaint to the Detroit Police Department who determined that the check was mistakenly cashed by an employee with the same name as the complainant.

## 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 36<sup>th</sup> District Court. (Exhibit B)

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 36<sup>th</sup> 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 36<sup>th</sup> 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 36<sup>th</sup> 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 36<sup>th</sup> 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 36<sup>th</sup> 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 36<sup>th</sup> 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 36<sup>th</sup> 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 36<sup>th</sup> 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 36<sup>th</sup> District Court. (Exhibit K)

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 36<sup>th</sup> 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 36<sup>th</sup> 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 36<sup>th</sup> 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 36<sup>th</sup> 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 36<sup>th</sup> 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 36<sup>th</sup> 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 36<sup>th</sup> 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 36<sup>th</sup> 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 36<sup>th</sup> District Court. (Exhibit T)

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 36<sup>th</sup> 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 36<sup>th</sup> District Court. (Exhibit V)

# 2014-NA-0085

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 36<sup>th</sup> District Court. (Exhibit W)

# 2014-NA-0086

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 36<sup>th</sup> District Court. (Exhibit X)

# 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 36<sup>th</sup> District Court. (Exhibit Y)

# 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 36<sup>th</sup> District Court. (Exhibit Z)

# 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 36<sup>th</sup> District Court. (Exhibit AA)

# 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 36<sup>th</sup> District Court. (Exhibit AB)

## 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 36<sup>th</sup> District Court. (Exhibit AC)

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 36<sup>th</sup> District Court. (Exhibit AD)

# 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 36<sup>th</sup> District Court. (Exhibit AE)

# 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 36<sup>th</sup> District Court. (Exhibit AF)

# 2014-DA-0127

The owners of a commercial building alleged that the Detroit Fire Department abused its authority by requiring them to make unnecessary renovations to the building's sprinkler system in order to comply with code. The complainant withdrew its complaint after filing a civil lawsuit in the matter.

# CITY OF DETROIT OFFICE OF INSPECTOR GENERAL

OIG CASE #2014-DA-006

June 19, 2014

Exhibit A 2014-DA-006



JAMES W. HEATH Inspector General

#### I. Introduction

The Office of Inspector General (OIG) opened an investigation into Detroit City Council President Pro Tem George Cushingberry's actions during a traffic stop by the Detroit Police Department on January 7, 2014 to determine whether he abused his authority by attempting to improperly influence the outcome of the stop.<sup>1</sup>

The OIG investigation was limited to whether Councilman Cushingberry used his status as a member of the Detroit City Council in a manner designed to influence the actions of the police officers who initiated the stop. For the reasons stated in this report, the City of Detroit Office of Inspector General concludes that there is insufficient evidence to support a finding that Council President Pro Tem Cushingberry abused his authority during his interaction with members of the City of Detroit Police Department.

# II. Investigation Sources

The Office of Inspector General reviewed a number of written documents, conducted direct interviews, and reviewed interviews conducted by the Internal Affairs Division of the Detroit Police Department. The events described in this report are derived from these sources.

# A. Written Documents consulted by the OIG in the course of investigation:

- Internal Affairs Inter-Office Memorandum regarding the investigation into the traffic stop of Councilman Cushingberry on January 7, 2014.
- Detroit Police Department Activity Logs of Officer Walter Atkins and Officer Alen Ibrahimovic; Officer Nico Hurd and Officer James Covington; Officer Donald Covington and Myron Watkins; and Sgt. William Carter.
- Internal Affairs complaint dated January 9, 2014.
- Detroit Police Department Manual Directive Numbers 202.1 and 203.3.
- 2012 Charter of the City of Detroit.

<sup>&</sup>lt;sup>1</sup> 2012 Detroit City Charter Section 7.5-306. Investigations may be initiated in response to a complaint or on the Inspector General's own initiative in order to detect and prevent waste, abuse, fraud, and corruption.

<sup>2012</sup> Detroit City Charter, Section 2-105 (A)(27) — "Public Servant means the Mayor, members of City Council, City Clerk, appointive officers, any member of a board, commission or other voting body established by either branch of City government or this Charter and any appointee, employee or individual who provides services to the City within or outside of its offices or facilities pursuant to a personal services contract.

# B. Interviews conducted or reviewed during the course of the investigation:

- Council President Pro Tem George Cushingberry
- Police Officer Walter Atkins
- Police Officer Alen Ibrahimovic
- Sergeant William Carter
- Police Officer Myron Watkins
- Police Officer Donald Covington
- Police Officer James Compton
- Police Officer Nico Hurd
- Richard Clement

# III. Undisputed Account

On January 7, 2014 at approximately 10:15 P.M. Detroit Police Officers Alen Ibrahimovic and Walter Atkins conducted a traffic stop of a vehicle driven by City Council President Pro Tem George Cushingberry. Councilman Cushingberry was driving a privately owned vehicle registered in his name. He was traveling in the area of Livernois Ave and Northfield. Councilman Cushingberry and his passenger, Richard Clement, were the only persons in the vehicle. The officers were driving a fully-marked police vehicle at the time of the stop.

Officers Ibrahimovic and Atkins approached Councilman Cushingberry's vehicle and requested his driver's license, registration, and proof of insurance. Councilman Cushingberry provided his city issued city council identification card and verbally identified himself as a city council member at least once during the stop. The responding officers indicate that they smelled a strong odor of marijuana coming from inside the vehicle as they approached. As a result, the officers ordered Councilman Cushingberry and Mr. Clements to exit the vehicle. The officers frisked Councilman Cushingberry and Mr. Clements and discovered "three (3) to four (4) marijuana blunts" on Mr. Clements. A search of the vehicle revealed a vial of suspected marijuana<sup>2</sup> in the center console and a "partially smoked blunt." Mr. Clement produced a valid Michigan medical marijuana card. Officer Ibrahimovic also discovered an empty or near empty liquor bottle on the passenger side floorboard as well as a half-filled cup of suspected alcohol.

All of the parties described the scene of the stop as tension-filled. Councilman Cushingberry believed that he had been wrongfully detained, and the officers were frustrated by what they believed was his refusal to cooperate fully. As a result, Officers Ibrahimovic and Atkins radioed for assistance. At least five additional police officers arrived at the scene soon after the traffic stop. However, only two, Officer Myron Watkins and Sgt. William Carter, had any significant contact with either passenger.

<sup>&</sup>lt;sup>2</sup> The parties to this incident believe that the substance in question was marijuana; however, no chemical analysis was conducted, so its makeup cannot be confirmed. For purposes of this report, it is considered "suspected marijuana" whether referred to as such or not.

Sgt. Carter was the last DPD member to arrive. As the highest ranking member, he ordered all of the officers except for Ibrahamovic and Atkins to leave the scene. Sgt. Carter evaluated the situation and determined that Councilman Cushingberry was not intoxicated or impaired and that the bottle of liquor was old and had not been consumed that night. He determined that Mr. Clement had less than 2.5 grams of marijuana, an amount he considered consistent with personal use. He instructed the officers to ticket Councilman Cushingberry for "Failure to Signal" and release him. He did not perform his own search of the vehicle and failed to collect any evidence or administer a Breathalyzer test.

None of the events related to the traffic stop were recorded. Police department vehicles are generally equipped with video and audio equipment designed to record certain police action. Of the 3 DPD vehicles which arrived at the scene, none successfully recorded the stop or the subsequent interaction between the officers and Councilman Cushingberry.

# IV. Disputed Accounts

In addition to the facts described above, the central parties<sup>3</sup> give differing accounts concerning several important details surrounding what occurred at the scene. However, two primary areas are of particular relevance to this investigation:

- Whether Councilman Cushingberry attempted to display his city council identification instead of providing his State of Michigan operator's license as requested by police; and
- The extent to which Councilman Cushingberry's statements regarding his status as a member of city council evidenced an effort to improperly influence the outcome of the police investigation

# A. The facts as described by Officers Ibrahamovic and Atkins

Officers Ibrahamovic and Atkins stopped Councilman Cushingberry because he nearly caused an accident with their scout car when he turned out of the Penthouse Lounge without signaling. The officers pulled behind the vehicle with their emergency lights and sirens activated. Councilman Cushingberry pulled his vehicle to the side of the road. But, when the officers got out of their car, Councilman Cushingberry drove an additional 10 to 15 feet. The officers got back into their vehicle and called out over the radio that the vehicle was hesitating to stop, causing additional officers to come to the scene as back-up.

As Officer Ibrahimovic approached the vehicle, Councilman Cushingberry identified himself by holding his city council badge out of his window and asked, "Do you know who I am?" The officers indicated that he also immediately identified himself as being a City Council member. When Officer Ibrahimovic got to the vehicle, he asked Councilman Cushingberry for his driver's license. Instead of producing the license, Councilman Cushingberry attempted to turn on the vehicle and reach for his gear shifter. In response, Officer Atkins opened the passenger side door, removed the keys and placed them on the vehicle's roof.

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<sup>&</sup>lt;sup>3</sup> Officers Ibrahimovic and Atkins; Councilman Cushingberry; Sgt. Carter

Councilman Cushingberry failed to provide a driver's license despite repeated requests by Officer Ibrahamovic and at least one request by Officer Atkins. Additionally, Councilman Cushingberry repeated that he was a city council member, a lawyer, and that his civil rights were being violated. Officer Ibrahamovic felt that this was an attempt at intimidation.

# B. The facts as described by Councilman George Cushingberry

Councilman Cushingberry used his turn signal when leaving the Penthouse Lounge parking lot after consuming only one alcoholic beverage, a water and diet Coke, but the officers may have been unable to see the signal from their vantage point. About a half-mile after he turned out of the parking lot Councilman Cushingberry noticed police lights, but did not hear a siren. He believed that the officers were attempting to drive around him so he pulled over to allow them to drive pass. Next, he believed that he heard an officer tell him to pull closer to the curb. He restarted the vehicle and moved the car forward in order to comply with the police command.

After pulling to the curb Councilman Cushingberry heard an officer say, "You are trying to run away!" He responded that he was not and held his hands in the air. An officer then told him to turn off his vehicle and he complied. Officer Ibrahimovic approached Councilman Cushingberry's door, grabbed him out of his vehicle, and handcuffed him to Mr. Clement after telling them to get out of the vehicle because he smelled marijuana. After he was out of his vehicle, an officer took Councilman Cushingberry's keys out of the ignition and placed them on top of his vehicle.

While standing outside, Officer Ibrahaovic told Councilman Cushingberry to place his driver's license on top of the car. Councilman Cushingberry stated that he either handed his operator's license to Officer Ibrahamovic or placed it on top of the vehicle as he had been instructed. Councilman Cushingberry never got his driver's license back from Officer Ibrahamovic. He claims to have asked Officer Ibrahimovic where his driver's license was during the stop and asked him to return it. Councilman Cushingberry's other items, including his city council badge and registration were returned to him at the scene.

According to Councilman Cushingberry, he placed his city council identification on top of his vehicle around the same time he produced his driver's license. He showed the council identification because he believed that DPD policy required him to identify himself as a public official. He stated that he identified himself as a city council member to the officers one time during the stop.

After approximately 30 minutes, Councilman Cushinberry was allowed to return to his vehicle. He waited there with the engine on while officers conducted their investigation and waited for a supervisor to arrive on the scene. Several different officers arrived while he was waiting for the supervisor.

When the supervisor, Sgt. Carter, arrived, he asked Councilman Cushingberry if he had provided his driver's license to the officers. Councilman Cushingberry answered that he had

done so, but that the officers had not returned it to him. Sgt. Carter asked Councilman Cushingberry whether his license was suspended, and Councilman Cushingberry responded that there had been a hold on the license, but that he had paid some parking tickets one week earlier in order to release the hold.

Councilman Cushingberry did not know that there was marijuana in the center console of the car, but believes that it belonged to his passenger, Mr. Clement - a registered medical marijuana user. With respect to the alcohol bottle, he contends that it was empty and was part of other trash that was in the vehicle. He had not consumed anything from the bottle recently.

Throughout the stop, Councilman Cushingberry repeatedly told officers that they were harassing and racially profiling him in violation of his civil rights and informed them that he was an attorney. Councilman Cushingberry stated that he did not use his authority or position to persuade the officers in any way and does not believe that his actions conveyed that sentiment to the officers.

# C. The facts as described by Sgt. William Carter

Sgt. Carter reported to the traffic stop after receiving a call from one of the responding officers. The officers told Sgt. Carter that they needed him to come to the scene because they had stopped a city council member who had a complaint about the way he was being treated. Upon arriving at the scene, Sgt. Carter learned that Councilman Cushingberry complained of being racially profiled and that the officers had no justification to stop him. There were three police vehicles at the scene when Sgt. Carter arrived. He directed Officers Compton, Hurd, Watkins and Covington to leave after determining that their presence was not necessary.

Sgt. Carter stated that Officers Atkins and Ibrahimovic called out a "jump the gun chase" over the radio. This term describes a situation in which a driver suddenly accelerates after an officer attempts to stop him, but does not drive any substantial distance. Sgt. Carter stated that no actual chase occurred because Councilman Cushingberry did not drive far after the initial stop. Sgt. Carter stated that when he arrived at the scene Officers Ibrahimovic and Atkins advised him that Councilman Cushingberry had an open bottle of alcohol in the vehicle, the vehicle smelled of marijuana, and that Councilman Cushingberry had a suspended license. Councilman Cushingberry told Sgt. Carter that his license was not suspended but that it had been placed "on hold" due to previously unpaid parking tickets that he had recently paid off.

1. The responding officers told Sgt. Carter that Councilman Cushingberry presented his operator's license to them.

When Sgt. Carter asked Councilman Cushingberry about his operator's license, the councilman told him immediately that the officers had it. Sgt. Carter maintains that Officers Ibrahimovic and Atkins told him that Councilman Cushingberry presented his operator's license to them but that they did not know what happened to it. Sgt. Carter claims that the officers told him that perhaps Officer Compton, an officer who had been dismissed from the scene, still had it. Sgt. Carter stated that he told the officers to contact Officer Compton via radio to retrieve the license while he talked to Councilman Cushingberry; however, he did not know whether the

officers actually contacted Officer Compton. He stated that is aware of past incidents involving multiple scout cars when an officer has mistakenly left with a subject's operator's license.

2. Sgt. Carter did not witness Councilman Cushingberry making abusive comments or attempting to use his position of authority in an inappropriate manner.

Sgt. Carter introduced himself to Councilman Cushingberry as Officers Atkins and Ibrahimovic stood by. Councilman Cushingberry began saying, "I didn't do anything! They are harassing me!" He stated that Councilman Cushingberry also said "Why are you messing with me? What have I done wrong? I'm just leaving the club. Why are they stopping me?" Sgt. Carter also heard Councilman Cushingberry state "I'm an attorney, why would I have alcohol in my car? Why would I have marijuana in my car?" Sgt. Carter described Councilman Cushingberry's demeanor as non-aggressive and non-violent. Sgt. Carter was aware of the councilman's position.

Sgt. Carter asked Councilman Cushingberry why he failed to immediately pull over when the officers attempted to stop him. Councilman Cushingberry stated that he did not see the police car behind him and added that he attempted to place his key back into the ignition to roll up his windows because he was cold and the officers told him to turn off his vehicle.

Sgt. Carter stated that he did not smell the odor of marijuana when he arrived but he noted this was likely due to the fact that the vehicle doors had remained open for approximately an hour prior to his arrival. He did not personally recover any marijuana but was informed of the suspected marijuana by Officer Ibrahimovic. Sgt. Carter determined that the suspected marijuana weighed less than 2.5 grams, which he considered an amount consistent with personal use.

Sgt. Carter asked Councilman Cushingberry to step out of his vehicle because Officers Ibrahimovic and Atkins believed that he had been drinking. Sgt. Carter asked him "common sense questions" which he believed an intoxicated person would not be able to answer. Sgt. Carter's questions included what the boundaries of Councilman Cushingberry's district were and who was the President of the United States. Councilman Cushingberry answered his questions satisfactorily. He did not appear to stagger or stumble while walking.

Sgt. Carter stated that Councilman Cushingberry was upset at the officers and repeatedly complained about their conduct. Sgt. Carter determined that the officers were not discriminating against Councilman Cushingberry. Sgt. Carter heard Mr. Clement attempt to calm Councilman Cushingberry down, saying "just calm down" and "they are just young, overzealous cops."

Sgt. Carter described Councilman Cushingberry as being relatively cooperative. He believed the officers were trying to be authoritative and Councilman Cushingberry was trying to "let them know who he was." Sgt. Carter thought the officers were "taking it personally," as was Councilman Cushingberry, who felt the officers were being overly aggressive.

Sgt. Carter observed an open alcohol bottle lying on the floorboard under the passenger's seat. He looked at the bottle and determined that it was "more than a few days old." Sgt. Carter

stated that he did not see a cup of alcohol inside Councilman Cushingberry's vehicle, though he did not conduct a thorough search. Sgt. Carter notified Officers Ibrahimovic and Atkins that there was not cause to arrest Councilman Cushingberry operating while intoxicated. Sgt. Carter directed Officer Atkins to issue Councilman Cushingberry a ticket for "Failure to Signal." He determined that Councilman Cushingberry's license plate was expired by one day, but he decided to issue him a warning for that. Sgt. Carter believed that Officers Ibrahimovic and Atkins became "frustrated" with his decisions.

# V. Analysis

A. A public servant does not abuse their authority simply by informing investigating officers that he or she is a City of Detroit employee.

The Detroit Police Department has a "Notification Policy" which requires that police officers inform executive level personnel of any "noteworthy incident, major crime, or unplanned event requiring unusual police response..." The policy also requires notification when an officer has cause to arrest a city employee for any serious offense. The notification is intended to move up the DPD chain of command to the Chief of Police if necessary. As noted in the DPD Internal Affairs report, Officers Ibrahimovic and Atkins believed that they were following appropriate policy by reporting this "noteworthy" event involving a city council member to their supervisor, Sgt. Carter.

Councilman Cushingberry offers two explanations regarding why he chose to identify himself as a member of the city council. First, he believed that the DPD notification policy required it. Second, when accused by officers of attempting to run away, he wanted to reassure them that he was not going to flee the scene of the investigation.

Regarding his first contention, Councilman Cushingberry was not required to notify the officers that he was a member of city council. The Office of Inspector General is aware of no rule or city council policy which requires such. The DPD policy places specific responsibilities on officers when they engage in certain police action involving city employees. The notification burden rests solely with officers. However, the existence of the DPD policy makes a public servant's employment status relevant when he or she is involved in a police investigation. In fact, the Internal Affairs investigation cited Sgt. Carter for failing to follow the policy when he failed to notify his supervisors about the incident involving Councilman Cushingberry.

If it is true that employment status places certain notification burdens on officers and their supervisors, it cannot legitimately be argued that a subject necessarily engages in abusive behavior by revealing his status as an active employee. How could officers know that they were dealing with an employee if the subject did not inform them and perhaps provide proof of their position? Officers would not know unless the employee was a well-known and widely recognized figure.

<sup>5</sup> Detroit Police Department Manual, Directive 202.1-9.3(1) (Effective Date February 22, 2012)

<sup>&</sup>lt;sup>4</sup> Detroit Police Department Manual, Directive 203.3 (Effective Date February 22, 2012)

Despite his long history as an elected official in county and state offices, on January 7<sup>th</sup> when the incident occurred, Councilman Cushingberry had only been a member of the Detroit City Council for one week. The initial responding officers indicated that they did not know Councilman Cushingberry and did not necessarily recognize him as being a member of the council until he informed them of such. Therefore, the only way they would know that they had stopped an official, and thereby triggered the notification requirement in keeping with DPD policy, would be if the councilman told them about his position. Criticizing Councilman Cushingberry for providing information which officers need to know would be incongruous with the notification policy, especially if it cannot be shown that he provided the information in a clearly inappropriate manner.

B. The contradictory statements given by DPD officers concerning whether Councilman Cushingberry presented his employee identification instead of an operator's license prevents the OIG from finding that he abused his authority.

City Council members and most City of Detroit employees are issued identification cards. The cards allow employees access to particular areas and information reserved for employees. The cards are "tools of the trade" which support the legitimate functions of the employee. Unreasonably making use of the identification card, or any "tool" given to an employee, for a purpose unrelated to a city function opens the employee to a charge of abuse. This is what makes the question of Councilman Cushingberry's use of his identification card relevant.

The use of the identification card would be considered abusive if the use was unreasonable given the circumstances. However, not every non-work related use of the identification card can be considered automatically unreasonable. Imagine the employee who is asked to produce a second form of identification when cashing a check at a bank. Or, consider an employee who walks out of the house with only her work identification on her person. If asked to identify herself by a third party has she abused her position? In both cases it would seem not.

The relevant question is whether the employee's actions were motivated by a desire to obtain some special, non-employee related benefit by virtue of presenting the identification. For instance, Officers Ibrahimovic's and Atkin's account is that Councilman Cushingberry refused to produce his operator's license as requested, and instead offered his city council identification. It is difficult to imagine any reasonable explanation for using a city-issued identification in such a manner.

However, Councilman Cushingberry, Richard Clement, and Sgt. Carter have a different account. Councilman Cushingberry maintains that he gave either Officer Ibrahimovic or Atkins his operator's license when requested to do so. He maintains that one of the officers misplaced it. This statement is consistent with what he told Officer Watkins when he requested the councilman's operator's license. Councilman Cushingberry's version is supported by his passenger, Mr. Clement, who told OIG investigators that he observed him give the operator's license to the officers.

Councilman Cushingberry's and Mr. Clement's statements are further supported by Sgt. Carter, who maintains that Officers Ibrahimovic and Atkins told him that they had received the license and that another officer might be in possession of it. This is persuasive in supporting the councilman's contention that he did not present his council identification card in lieu of his operator's license. The context surrounding the use of the identification card matters. For purposes of determining abuse, presenting the card *along with* the requested operator's license versus *instead of* the license is substantively different. In the former example, the possibility exists that Councilman Cushingberry was simply providing all of the relevant information he had available. Compare that to offering the identification card *instead of* the license, which is essentially a demand to be dealt with, not on the basis of being a driver on a Michigan roadway, but instead as a high-ranking City of Detroit employee. By any reasonable standard this would constitute abuse.

Admittedly, deciding which version to believe is a close call. It should be noted that the Internal Affairs Division report found no evidence that the operator's license had been presented or lost. However, the differing statements on this important issue, particularly among members of the same department, leaves too much doubt about what actually occurred to support a finding that Councilman Cushingberry presented his identification in an abusive manner.

## C. The lack of video or audio evidence prevents a finding of abuse in this instance.

Detroit Police Department vehicles are supposed to be equipped with operational video and audio equipment. The purpose for this is obvious – to record relevant actions of police personnel and subjects during a police stop. As was noted during interviews and by the Internal Affairs report, none of the three scout cars at the scene recorded the events of the traffic stop. Additionally, none of the conversations between the officers and Councilman Cushingberry were captured the by the officers' "body-mic" audio systems.

The context surrounding Councilman Cushingberry's actions is important. The mere mention of his position or even the display of his ID is not enough to conclusively show abuse. Councilman Cushingberry's statements, mannerisms, and demeanor are important factors which must be considered.

Officers Ibrahimovic, Atkins, Watkins, and Sgt. Carter had the most contact with Councilman Cushingberry and were best positioned to observe his behavior. All describe him as being upset about the traffic stop. They all indicated that he complained that he was being harassed, racially profiled, and that his civil rights were being violated. The officers stated that in addition to referring to himself as "Councilman Cushingberry," he repeated several times that he was an attorney and planned to challenge the validity of the stop. Officers Ibrahimovic and Watkins believed that Councilman Cushingberry was attempting to intimidate the officers on the scene by stating his professional and political credentials. However, Sgt. Carter described his demeanor as "non-aggressive, non-violent, and relatively cooperative."

The question is not whether Councilman Cushingberry exhibited model citizen behavior during his encounter with the officers. Rather, it is whether his conduct and statements crossed the line into abusing his authority as a member of city council. The lack of tangible video and

audio evidence documenting the incident makes supporting a finding that Councilman Cushingberry's demeanor and statements crossed this threshold difficult. It is particularly difficult when the department against whom the alleged abuse was directed has the responsibility of maintaining the equipment necessary to record the relevant actions.

# D. The potential criminal violations which arose as a result of the stop do not form the basis for abuse in this instance.

There has been considerable discussion regarding the presence of suspected marijuana and alcohol in Councilman Cushingberry's vehicle, whether he was under the influence of any intoxicating substances, and the status of his operator's license at the time of the stop. These issues were not part of the primary scope of the Office of Inspector General investigation. At their core, these issues represent potential violations of city and state criminal laws.

This office routinely investigates matters which may involve criminal conduct. In fact, the Charter specifically contemplates it. However, the Charter does not grant "law enforcement" powers to the office. It makes clear that the Inspector General shall turn over the results of an investigation to an appropriate law enforcement agency in cases in which the Inspector General determines that probable cause of a crime exists. In most cases, this office conducts an investigation up to a point and turns the results over to either the police or a prosecuting agency in the hopes of having criminal charges issued. However, in this instance, the police concluded that criminal charges were not warranted prior to the Office of Inspector General becoming involved. As a practical matter, re-submitting a request for a criminal investigation would be fruitless.

By failing to collect evidence, conduct formal field sobriety tests, or administer a Breathalyzer test, the police made an affirmative decision not to pursue criminal charges against Councilman Cushingberry. Whether this was the appropriate decision under the circumstances is a matter best left for police department leaders to determine. As Chief Craig has noted, the Internal Affairs Division conducted a review to determine whether the officers' actions complied with department policy and has issued a report detailing their findings. The Office of Inspector General's jurisdiction covers all public servants. This includes uniformed officers. However, the Internal Affairs investigation was comprehensive in its review of the police action and this office accepts those findings. Additionally, the OIG investigation has not found any evidence suggesting that any of the DPD personnel involved in this incident engaged in corrupt, abusive, or fraudulent conduct at any point.

## VI. Conclusion & Recommendations

The Office of Inspector General finds that there is insufficient evidence to conclude that Detroit City Council President Pro Tem George Cushingberry abused his authority during the course of his interaction with members of the Detroit Police Department on January 7, 2014.

<sup>&</sup>lt;sup>6</sup> Councilman Cushingberry was driving his personal vehicle at the time of the stop. The analysis with respect to the contents of the vehicle, the manner in which he operated the vehicle, and his fitness to drive would be more relevant were he driving a city-owned vehicle at the time. Also, the incident occurred outside of normal city work hours.

However, the Office of Inspector General suggests the following recommendations which will perhaps limit the need for future investigations of this type in the future.

# A. The Executive and Legislative branches should formulate guidelines which govern employees' "non-official" interaction with law enforcement and other city personnel.

There have been several reported incidents in the recent past in which high ranking public servants have been accused of attempting to intimidate law enforcement officers by "identifying" themselves in what might be considered an aggressive manner. No rule or policy can cover every type of interaction between city employees, especially those involving police. However, a rule governing the use of city-issued identification and badges is warranted. For instance, the OIG requires that staff members sign a form governing the use of city issued identification materials. Other cities across the nation have similar procedures. The City Council has the authority to issue guidelines covering the manner in which its members and staff interact with police and other city personnel outside of the normal exercise of legislative duties. The mayor has the same authority as it pertains to other city employees. Enacting clear rules will provide much needed guidance to public servants about their responsibilities and assist everyone in determining when an employee has crossed the line.

# B. The Detroit Police Department should review its Notification Policy to ensure that it does not mistakenly create an atmosphere of favoritism.

The Detroit Police Department and the Board of Police Commissioners should review their notification policy to ensure (1) that city employees, especially high ranking public servants, are not afforded special treatment in their dealings with police officers, and (2) that department members understand that their authority to engage in police action is not hampered in any way by the position a potential subject holds. Chief Craig appropriately emphasized both points in his comments on this incident. However, additional thought and discussion on this policy cannot hurt. Police officers should always feel comfortable calling on supervisors in unique police situations. However, any thoughts that arresting or investigating a high ranking official calls for more paperwork or explanation than normal may lead to a situation in which officials are simply given a pass. This is not the intent of the notification policy. A review would insure that it is not an unintended consequence.

# Exhibit B 2014-NA-0062

STATE OF MICHIGA 36 JUDICIAL DISTR 3RD JUDICIAL CIRC	ICT	COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 96-14900544-01 MSP#:
District Court ORI: MI820	)365J Cir	cult Court ORI; MI-MI821095J	AG ORI: MI820025A
THE PEOPLE OF THE	HE STATE OF MICHIGA	N.	Vicilm or complainant:  STATE OF MICHIGAN  UNEMPLOYMENT INS AGENCY
TINA LANAY ANDER 4434 KENNSINGTOI DETROIT, MI 48224	Y AVE		Complaining Witness S/A CHARLES BRADLEY S/A MARK KACHAR
Co-delendant(s)	·		Date: On or about 09/21/2011 - 03/31/2012
City/Twp://illage DETROIT	County in Michigan WAYNE	Defendant SID	Defendant DOB 3/6/1969
Charge(s) See Below			Maximum Penalty See Below

# STATE OF MICHIGAN, COUNTY OF WAYNE

The complaining witness says that on the date above and alfor 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]

The complaining witness asks that defendant be apprehended.	ed and dealt with according to law.
Warrant authorized on 4-22-14 by:	Complaining witness alignature
ma-burt	Subscribed and swom to before me on
Denise M. Hart (P45127) Assistant Attorney General	Uprha
Michigan Department of Attorney General	
Criminal Division	(1h) 271
3030 W. Grand Blvd. Cadillac Place, Suite 10-200   Detroit, MI 48202	1 NACL (1/5/
313-456-0180	Judge/Magistrate/Clerk Bar no.
Security for costs posted	

# Exhibit C 2014-NA-0063

STATE OF MICHIGA 36 JUDICIAL DISTRI 3RD JUDICIAL CIRC	CT	COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 96-14900531-01 MSP#:
District Court ORI: MI820	365J Ctr	cuit Court ORJ. MI- MI821095J	LAG GRE M820025A
THE PEOPLE OF TH	E STATE OF MICHIGA	AN .	Victim or complainant:
v			STATE OF MICHIGAN _UNEMPLOYMENT INS AGENCY
TIFFANY TRISHAWI	N HARDRICK		Complaining Witness
14419 PENROD			S/A MARK KACHAR
DETROIT, MI 48223			S/A CHARLES BRADLEY
Co-defendant(s)			Date: On or about 07/01/2011 - 09/30/2011
City/Twp./Village DETROIT	Gounty in Michigan WAYNE	Defendant SID	Defendant DOB 3/6/1978
Charge(s)	TANDIIAC		Maximum Penelty
See Below			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]

The complaining witness asks that defendant be apprehended	d and dealt with according to law.
Warrant authorized on 4-12-14 by: Date Mart	Complaining witness signature  Subscribed and swom to before me on
Denisa 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	UKR 1761
313-456-0180	Judge/Magistrate/Clerk Bar no.

# Exhibit D 2014-NA-0064

STATE OF MICHIG 36 JUDICIAL DISTE 3RD JUDICIAL CIR	RICT	COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 96-14900558-01 MSP#: 1 5 5 8
District Court ORI; MI82	20365J C	ircuit Court ORI, MI- MI821095J	AG ORI: MI820025A
THE PEOPLE OF T	HE STATE OF MICHIG	AN	Victim or complainant: STATE OF MICHIGAN
V			UNEMPLOYMENT INS AGENCY
LYNETTE MARIE J.			Complaining Witness
20937 EASTWOOD STREET			S/A MARK KACHAR
WARREN, MI 4808:	9		S/A CHARLES BRADLEY
			Date: On or about 05/01/2011 ~ 07/31/2012
City/Twp./Village	County in Michigan	Defendant SID	Defendant DOB
DETROIT	WAYNE		2/24/1966
Charge(s) See Below			Maximum Penalty
DEC DEIDM			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,

The complaining witness asks that defendant he apprehended and dealt with according to favor

# 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]

i //	— ////////////////////////////////////
Warrant authorized on 4-22-14 by	Complaining witness signature
makent	Subscribed and swom to before me on
Denise M. Hart (P45127) Assistant Altomey General	. Daje
Michigan Department of Attorney General	
Criminal Division 3030 W. Grand Blvd Cadillac Place, Suite 10-200	, (MD 1071
Detroit, MI 48202 313-456-0180	Judge/Magistrate/Clerk Bar no
Security for costs posted	14.

# Exhibit E 2014-NA-0065

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT		COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 96-14900548-01 MSP#:	
District Court ORI M182036	5J Girau	it Court ORI MI- MI821095J	AG ORI. MI820025A	
THE PEOPLE OF THE	STATE OF MICHIGAN	V	Victim or complainant.	
v			STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY	
JAMES EARL PARKER			Complaining Witness	
12118 CLOVERLAWN			S/A CHARLES BRADLEY	
DETROIT, MI 48204			S/A MARK KACHAR	
Co-defendant(s)			Date: On or about 05/22/2011 - 05/19/2012	
City/Twp./Village	County In Michigan	Defendant SID	Defendant DOB	
DETROIT	WAYNE		5/17/1974	
Charge(s)			Maximum Penalty	
See Below			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]

The complaining witness asks that defendant be	apprehended and de	lealt with according to law
Warrant authorized on 4/24/14	by	11 MP PAGE
Wallett addictized on	D) [	Complaining wilness signature
TM-lar	_	Subscribed and sworn to before me on 4/24/14
Denise M. Hart (P45127)		Date
Assistant Attorney General		·
Michigan Department of Attorney General		
Criminal Division		140
3030 W. Grand Blvd Cadillac Place, Suite 10-200		T White A Things
Detroit, MI 48202		Judge/Magistrate/Clark / Bar no
313-456-0180		Dai 10
Security for costs posted		_

# Exhibit F 2014-NA-0066

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUI		COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 96-14900545-01 MSP#:
District Court ORI: MI82036	5J Chr	wit Court ORI: MI- MI821095J	AG DRI: MI820025A
THE PEOPLE OF THE	STATE OF MICHIGA	N	Victim or complainant: STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY
KEYLETON LOUIS SMI 18450 LITTLEFIELD DETROIT, MI 48235	TH		Complaining Witness S/A CHARLES BRADLEY S/A MARK KACHAR
Co-defendant(s)			Date: On or about 08/01/2011 - 01/30/2012
City/Twp./Village DETROIT	County in Michigan WAYNE	Defendant SID	Defendant DOB 2/17/1960
Charge(s) See Below			Maximum Penalty See Below

#### STATE OF MICHIGAN, COUNTY OF WAYNE

The complaining witness says that on the date above and alfor 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]

The complaining witness asks that defendant be apprehence	d and deal with according to law
Warrant authorized on 4-22-14 by:  Date  M-42:+	Complaining witness signature
Denise M. Hart (P45127) Assistant Attorney General Michigan Department of Attorney Genera.	Subscribed and swom to before me on
Criminal Division 3030 W. Grand Blvd. Cadillac Place, Suite 10-200 Detroit, MI 48202 313-456-0180	Judge/Magistrate/Clerk Bar no
Security for costs posted	

# Exhibit G 2014-NA-0067

36 JUDICIAL DISTRI 3RD JUDICIAL CIRC	CT	COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 96-1490053.4-01 MSP#.	
District Court OR1 MI820365J C reut Court OR1 MI- MI821095J			AG ORI. MI820025A	
	E STATE OF MICHIGA	ıN	Victim or complainant STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY	
TODD DAMEON TAYLOR 8942 LITTLEFIELD STREET DETROIT, MI 48228			Complaining Witness S/A MARK KACHAR S/A CHARLES BRADLEY	
Co-defendant(s)			Date: On or about 07/01/2011 - 02/29/2012	
City/Twp Millage DETROIT	County in Michigan WAYNE	Defendant SID	Defendant DOB 3/8/1970	
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  The tirt	Complaining witness signature
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	Subscribed and swom to before me on
313-456-0180  Security for costs posted	Judge/Magistrate/Clerk Bar no

# Exhibit H 2014-NA-0069

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT		COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 96-14900535-01 MSP#:
District Court ORI; MI82036	5J Clm	wit Court ORI; MI-MIB21095J	AG ORI: MI820025A
THE PEOPLE OF THE	STATE OF MICHIGA	N	Victim or complainant: STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY
SHARYCE YVONNE HU 2200 MONTCLAIR STR DETROIT, MI 48214			Complaining Witness S/A CHARLES BRADLEY S/A MARK KACHAR
Co-defendant(s)			Date: On or about 02/01/2011 - 09/30/2011
City/Twp:/Villege DETROIT	County in Michigan WAYNE	Defendant SID	Defendant DOB 1/24/1970
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]

The complaining witness asks that defendant be apprehended an	d dealt with according to law.
Warrant authorized on 4-22-14 by:	Malthe
ma levil	Complaining witness signature  Subscribed and swom to before me on
Denise M. Hart (P45127) Assistant Attorney General	Date
Michigan Department of Atlorney General Criminal Division	118/07-1
3030 W. Grand Blvd. Cadillac Place, Suite 10-200 Detroit, MI 48202	Value 61
313-456-0180 Security for costs posted	Judga/Magistrate/Clark Bar no.

Exhibit I 2014-NA-0071

STATE OF MICHIGAN DISTRICT: 36 JUDICIAL DISTRICT CIRCUIT: COMPLAINT 3RD JUDICIAL CIRCUIT CTN: 96-14900533-01 **MISDEMEANOR** MSP#. District Court ORI: MI820365J Circuit Court ORI: MI- MI821095J AG ORI: MI820025A Victim or complainant: THE PEOPLE OF THE STATE OF MICHIGAN STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY **DEAN STORY** Complaining Witness **24060 ITHACA** S/A MARK KACHAR OAK PARK, MI 48237 S/A CHARLES BRADLEY Co-defendant(s) Oale: On or about 11/01/2010 - 09/30/2011 City/Twp\_Village County in Michigan Defendant SID Defendant DOB WAYNE DETROIT 11/25/1956 Charge(s) Maximum Penalty See Below See Below

# STATE OF MICHIGAN, COUNTY OF WAYNE

The complaining witness says that on the date above and after In the City of Detroit, the defendant, contrary to law.

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

1 an 14	
Warrant authorized on 4-22-14 by:	Comptaining witness signature
Denise M. Hart (P45127) Assistant Attorney General Michigan Department of Attorney General	Subscribed and sworn to before me on
Criminal Division, Criminal Division 3030 W. Grand Blvd. Cadillac Place, Suite 10-200 Detroit, Mt 48202	1000
313-456-0180	Judge/Magistrate/Clerk Bar no.

# Exhibit J 2014-NA-0072

STATE OF MICHG 36 JUDICIAL DISTR 3RD JUDICIAL CIRC	RICT	COMPLAINT MISDEMEANOR	DISTRICT CIRCUIT CTN 96-14900557-0 1 MSP#
District Court ORI: MI82	0365J c	Fireuit Court ORI: MI- MI821095J	AG ORI MI820025A
THE PEOPLE OF T	HE STATE OF MICHIG	SAN	STATE OF MICHIGAN
V			UNEMPLOYMENT INS AGENCY
DAROLD WHITEHE			Complaining Witness
3744 GLENDALE STREET			S/A MARK KACHAR
DETROIT, MI 48238			S/A CHARLES BRADLEY
Co-delendant(s)			Date On or about 01/01/2011 - 07/31/2012
City/Twp./Village	County in Michigan	Defendant SID	Defendant DOB
DETROIT	WAYNE		4/13/1964
Charge(s)			Maximum Penalty
See Below			See Below

# STATE OF MICHIGAN, COUNTY OF WAYNE

The complaining witness says that on the date above and affor 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]

The complaining witness asks that defendant be apprehended	d and dealt with according to law
Warrant authorized on 4-22-14 by:  Date  Date	Complaining wilness signature
Denise M. Hart (P45127) Assistant Attorney General	Subscribed and sworn to before me on 1/34/14
Michigan Department of Attorney General Criminal Division 3030 W. Grand Blvd. Cadillac Place, Suite 10-200	(W. (IT74)
Detroit, MI 48202 313-456-0180  Security for costs posted	Judge/Magistrate/Clack Bar no

# Exhibit K 2014-NA-0073

STATE OF MICHIG 36 JUDICIAL DISTR 3RD JUDICIAL CIRC	RICT	COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT. CTN: 96-1490055 9-01 MSP#
District Court ORI: M182	0365J Ci	roust Court ORI: MI-MI821095J	AG ORI MI820025A
THE PEOPLE OF TO	HE STATE OF MICHIG	AN	STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY
RONA ANITA WILSO 19707 SPENCER ST DETROIT, MI 48234	REET		Complaining Witness SIA MARK KACHAR SIA CHARLES BRADLEY
Co-defendant(s)			Date On or about 01/01/2011 - 05/21/2011
City/Twp://illage DETROIT	County in Michigan WAYNE	Defendant SID	Defendant DOB 8/1/1981
Charge(s) See Below			Maximum Penalty See Below

# STATE OF MICHIGAN, COUNTY OF WAYNE

The complaining wilness 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]

The complaining withess asks that detendant be appreciated	d and dealt with according to law,
Warrant authorized on 4-22-14 by	Complaining witness signature
- Date Height	Subscribed and swom to before me on 4-24-14
Denise M. Hart (P45127) Assistant Altorney General Michigan Department of Attorney General	Date
Criminal Division 3030 W. Grand Blvd. Cadillac Place, Suite 10-200 Detroit, MI 48202	CASE STO
313-456-0180	Judge/Magistrate/Clerk Bar no

# Exhibit L 2014-NA-0074

STATE OF MICHIGAN 36 JUDICIAL DISTRICT			IDICTD:07
		COMPLAINT	DISTRICT: CIRCUIT:
3RD JUDICIAL CIRC	TIUC		CTN: 96-14900532-01
		MISDEMEANOR	MSP#:
District Court ORI MI820	)365J	Circuit Court ORF MI- MI821095J	AG ORI: MI820025AD
			Victim or complainant.
THE PEOPLE OF TH	HE STATE OF MICHIO	GAN	visual semplanda
v			STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY
<b>JOY ALEXIS PATILL</b>	.0		Complaining Witness
11591 MEADOWS COURT			S/A CHARLES BRADLEY
BELLEVILLE, MI 48	111		S/A MARK KACHAR
Co-defendant(s)			Dale: On or about
City City A City	7 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -	To a series	02/01/2011 - 01/31/2012
City/Twp./Village	County in Michigan	Defendant SID	Defendant DOB
DETROIT	WAYNE		9/12/1974
Charge(s) See Below			Maximum Penalty
SEE DEIDA			See Below

# STATE OF MICHIGAN, COUNTY OF WAYNE

The complaining witness says that on the date above and allor 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]

The complaining witness asks that defendant be apprehended and	dealt with according to law.
Warrant authorized on 4-22-14 by	Complaining wilness signature
1000 Burt	Subscribed and sworn to before me on
Denise M. Hart (P45127) Assistant Attorney General	/ Coate
Michigan Department of Attorney General	
Criminal Division 3030 W. Grand Blvd Cadillac Place, Suite 10-200 Detroit, Mt 48202	CULOZ 5767
313-456-0180	Judge/Magistrate/Clerk Bar no
Security for costs posted	

# Exhibit M 2014-NA-0075

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT	r	COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 96-14900556-01 MSP#:
District Court ORI: M1820365	oJ Cin	mit Court ORI MI- MI821095J	AG ORI: M/820025A U U Z
THE PEOPLE OF THE	STATE OF MICHIGA	N	Victim or complainant.
v			STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY
DOMINIQUE SHANNAR 19704 HEALY STREET	D ALSTON		Comptaining Witness
DETROIT, MI 48234			S/A MARK KACHAR S/A CHARLES BRADLEY
Co-defandant(s)			Date On or about 01/30/2008 - 08/31/2012
City/Twp://illage DETROIT	County in Michigan WAYNE	Defendant SID	Defendant DOB 8/23/1985
Charge(s) See Below			Maximum Penalty See Below

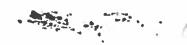
STATE OF MICHIGAN, COUNTY OF WAYNE

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]

The complaining witness asks that defendant be apprehended	and dealt with according to law.
Warrant authorized on 4-22-14 by:	· Of White
Date Date	Complaining Witness signature
Denise M. Hart (P45127)	Subscribed and sworn to before me on
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	Judge/Magistrate/Clerk Bar no
Security for costs posted	



# Exhibit N 2014-NA-0076

STATE OF MICHIG. 36 JUDICIAL DISTR 3RD JUDICIAL CIRC	RICT	COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 96-14900547-01 MSP#:
District Court ORI; MI82	0365J C	ircuit Court ORI MI- MIB21095J	AG ORI: MI820025A
THE PEOPLE OF T	HE STATE OF MICHIG	AN	Victim or complanant.
v			STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY
KENNETH FASHAW 11709 FORRER STE	REET		Complaining Witness
DETROIT, MI 48219			S/A MARK KACHAR S/A CHARLES BRADLEY
Co-defendant(s)			Date On or about 08/01/2008 -09 30/2012
City/Twp Millage DETROIT	County in Michigan	Delendant SID	Defendant DOB 12/13/1981
Charge(s) See Below			Maximum Penalty See Below

## STATE OF MICHIGAN, COUNTY OF WAYNE

The complaining witness says that on the date above and allor 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]

The complaining witness asks that defendant be apprehended and o	tealt with according to law.
Warrant authorized on 4-22-14 by:	Silliffich
Date	Complaining witness signature
Tyra lout	Subscribed and swom to before me on
Denise M. Hart (P45127)	Date
Assistant Attorney General	\ \ \
Michigan Department of Attorney General	, '
Criminal Division 3030 W. Grand Blvd. Cadillac Place, Suite 10-200	1161 500
Detroit, MI 48202	VNA 13 (D)
313-456-0180	Judge/Magistrate/Clerk Bar no
Security for costs posted	

# Exhibit O

## 2014-NA-0077

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUI		COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 96-14900552-01 MSP#:
District Court ORt: M182036	5J Circu	t Court ORI; MI- MI821095J	AG ORI: MI820029A 0 3 7 5
THE PEOPLE OF THE	STATE OF MICHIGAN	1	Victim or comptainant:
v			STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY
MAMIE BROWN 12674 RACINE STREET DETROIT, MI 48205	r 		Completning 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 12/22/1947
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]

The comparing winess asks that detendant be appreciation and	dealt with according to law.
Warrant authorized on 4-27-14 by:	Complaining witness signature
makert	Subscribed and swom to before me on
Denise M. Hart (P45127) Assistant Attorney General	Oqte /
Michigan Department of Attorney General Criminal Division 3030 W. Grand Blvd. Cadillac Place, Suite 10-200	11/10 DN1
Detroit, MI 48202 313-458-0180	Judge/Magistrale/Clark Bar no.
Security for costs posted	

# Exhibit P

2014-NA-0078

STATE OF MICHIGAN		DISTRICT:		
36 JUDICIAL DISTRICT		COMPLAINT		
3RD JUDICIAL CIRCUIT	CUIT		CIRCUIT:	
		MISDEMEANOR	CTN: 96-14900553-01 MSP#:	
District Court ORI: MI82	0365J C	ircuit Court ORI: Mt- MI821095J	AS OFIL! NTB20023AC)	
			سام ما سر باش بيگ بيش بيگ مانيد باش بيگ مانيد بيش بيگ بيش	
THE PEOPLE OF T	HE STATE OF MICHIG	AN	Victim or complainant:	
V			STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY	
RANDALL CHARLE			Complaining Witness	
19157 GABLE STRE	EET		S/A MARK KACHAR	
DETROIT, MI 4820	5		S/A CHARLES BRADLEY	
Co-defendant(s)			Date: On or about	
			01/01/2008 - 06/30/2012	
City/Twp_Valage	County in Michigan	Defendant SID	Defendant DOB	
DETROIT	WAYNE		8/31/1974	
Charge(s)			Meximum Penalty	
See Below			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]

The complaining witness asks that defendant be apprehended and	d dealt with according to law.
Warrant authorized on 4-22-14 by:	Complaining witness signature
Danise M. Hart (P45127)	Subscribed and swom to before me on
Assistant Attorney General Michigan Department of Attorney	Oals
Criminal Division 3030 W. Grand Blvd. Cadillac Place, Suite 10-200 Detroit, MI 48202	(UII) STOOL
313-456-0180	Judge/Magistrate/Clerk Bar no

# Exhibit Q 2014-NA-0079

36 JUDICIAL DISTRI 3RD JUDICIAL CIRC	ICT	COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 96-14900529-01 MSP# 1. C = 3 3 \$ 1
District Court ORI: M1820	365J Ci	cult Court ORI: Mr- MI821095J	AG OR! MI820025A
THE PEOPLE OF TH	HE STATE OF MICHIGA	AN	STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY
STARR ROCHELLE 4636 DUDLEY STRE DETROIT, MI 48205	ET	-	Complaining Witness S/A CHARLES BRADLEY S/A MARK KACHAR
Co-defendant(s)			Date: On or about 10/01/2008 - 06/30/2011
City/Twp./Village DETROIT	County in Michigan WAYNE	Defendant SID	Defendant DOB 7/6/1963
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]

Warrant authorized on 4-22-14 by:	MATAN
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	Complaining witness signature  bed and swom to before me on

# Exhibit R 2014-NA-0080

STATE OF MICHIGA 36 JUDICIAL DISTR 3RD JUDICIAL CIRC	NCT	COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 96-14900550-01 MSP#:
District Court ORI; M182	0365J Circ	uit Court ORI: MJ-MI821095J	AG ORI, MI820025A 5 5 5 7 7
THE PEOPLE OF T	HE STATE OF MICHIGA	N	STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY
DARIUS ANTWON-1 16868 CARLISLE S' DETROIT, MI 48234	TREET		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	Defendant DOB 5/10/1990
Charge(s) See Below			Maximum Penalty See Below

#### STATE OF MICHIGAN, COUNTY OF WAYNE

The complaining witness says that on the date above and affor 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 \$25,600; contrary to MCL 421.54(b)(ii)(A). [421.54BIIA]

The complaining witness asks that defendant be apprehended	ed and dealt with according to lay
Warrant authorized on 4-12-14 by	Complaining witness signature
Denise M. Hart (P45127)	Subscribed and sworm to before me on
Assistant Attorney General Michigan Department of Attorney General Criminal Division 3030 W. Grand Blvd., Cadillac Place, Suite 10-200	[ [4] 0] 177
Detroit, MI 48202 313-456-0180  Disecurity for costs posted	Judge/Magistrate/Clerk Bar no

STATE OF MICHIG 36 JUDICIAL DISTF 3RD JUDICIAL CIRC	RICT	COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 96-14900551-01 MSP#:
District Court ORI: M182	0365J C	roult Court ORI: MI- MI821095J	AG ORI: MI820025A 3 3 0 7
THE PEOPLE OF T	HE STATE OF MICHIG	AN	Victim or complainant:
v			STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY
JOSEPH MATTHEW QUINN 25955 MACKINAC STREET ROSEVILLE, MI 48066			Complaining Witness S/A MARK KACHAR S/A CHARLES BRADLEY
Co-defendant(s)			Date: On or about 08/01/2010 - 12/31/2012
City/Twp.//filage DETROIT	County in Michigan WAYNE	Defendant SID	Defendant DOB 2/1/1966
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). [421.54BIA]

Warrant authorized on $4 - 22 - 14$ by:	- Man Scotland to term.
Warrant authorized on 4 - 11-14 by:	Complaining witness Signature
Date  Denise M. Hart (P45127)  Assistant Attorney General  Michigan Department of Attorney General	Subscribed and swom to before ma on
Criminal Division 3030 W. Grand Blvd. Cadillac Place, Suite 10-200 Detroit, MI 48202 313-456-0180	Judge/Magistrale/Clerk Bar no.
Security for costs posted	

# Exhibit T 2014-NA-0082

STATE OF MICHIGAN 36 JUDICIAL DISTRIC 3RD JUDICIAL CIRCU	т	COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 96-14900554-01 MSP#:
District Court ORI: MI820365J Circuit Court ORI: MI- MI821095J			AG ORI: MIB20025A
THE PEOPLE OF THE	STATE OF MICHIGA	N	Victim or complainant
V		STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY	
ROMAND CLINY SMIT 23237 PROVIDENCE D SOUTHFIELD, MI 480	OR APT 202	Complaining Witness S/A MARK KACHAR S/A CHARLES BRADLEY	
Co-defendant(s)			Date: On or about 10/01/2007 - 06/30/2012
City/Twp /Village DETROIT	County in Michigan WAYNE	Defendant SID	Defendant DOB 3/3/1987
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]

The complaining witness asks that defendant be apprehe	ended and dealt with according to law
Warrant authorized on 4-22-14 by.	Complaining witness signature
Denise M. Hart (P45127) Assistant Attorney General Michigan Department of Attorney General	Subscribed and sworn to before me on
Criminal Division 3030 W. Grand Blvd Cadillac Place, Suite 10-200 Detroit, MI 48202 313-456-0180	Judge/Magistrate/Clerk Bar no
Security for costs posted	

### Exhibit U 2014-NA-0083

STATE OF MICHIGAN				DISTRICT:
36 JUDICIAL DISTRICT		WARRAN	г	CIRCUIT:
3RD JUDICIAL CIRCUIT		MISDEMEAN	-	CTN: 96-14900527-01
				MSP#:
District Court ORI; MI820365.	J Clrs	zilt Court ORI; Mi- MI82109	5J	AG ORI: MI829025A 3 7 5
THE PEOPLE OF THE S	TATE OF MICHIGA	N .	· · · · · · · · · · · · · · · · · · ·	Victim or complainant,
				STATE OF MICHIGAN
V				UNEMPLOYMENT INS AGENCY
TIA NAVE TUBBS 2747 CALVERT STREET				
DETROIT, MI 48238				Complaining Witness
				S/A MARK KACHAR
Haight: Weight:	Hair Color: Eye	Color: Race:	Sex	S/A CHARLES BRADLEY  Date: On or about
		Unknown	F	04/01/2009 - 04/31/2012
City/Twp./Village DETROIT	County in Michigan WAYNE	Defendant SID		Defendant DOB 2/8/1980
Charge(s) See Below				Maximum Penalty See Below
OF \$1,000 TO \$25,000 did make a false statem payment under the Mich more but less than \$25.	ent or represental nigan Employment 000; contrary to M es the amount of	tion knowing it to be fa Security Act for herse ICL 421.54(b)(ii)(A). [4 fraud and 1 Year, or co	ise in order to if, the amount 21.54BIIA] ommunity sen	ENT/MISREPRESENTATION - LOSS obtain or increase a benefit or other timproperly obtained, being \$1,000 or vice for up to 1 Year but not to exceed exceed 1 Year
there is probable cause	to believe that def	fendant committed the	offense(s). T	ed has/have been committed and that HEREFORE, IN THE NAME OF THE endant before the 36 District Court
The defendant may	be released before	е аггаignment if \$		is posted as interim bail
by Date	·			
Date 444	(SEAL)	ludas/Maciete	JAK	Mar no

### Exhibit V 2014-NA-0084

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT		COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 96-1490053 0-01 MSP#
District Court ORt. M1820365	J Cin	cult Court ORI; MI- MI821095J	AG ORI - MI820026A
THE PEOPLE OF THE S	TATE OF MICHIGA	N	STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY
JUSTIN VIRGIL-JONATH 4413 JOHN R. STREET, I DETROIT, MI 48201 Co-defendants)			Complaining Witness S/A CHARLES BRADLEY S/A MARK KACHAR
	<b>1</b>		Dale On or about 10/01/2007 - 02/29/2013
OETROIT	County in Michigan WAYNE	Defendant SID	Defendant DOB 11/17/1983
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]

The complaining witness asks that defendant be apprehended and o	lealt with according to law.
Warrant authorized on 4-22-20/4 by:	- The Male
Date	Complaining witness signalure
makent.	Subscribed and sworn to before me on
Denise M Harl (P45127)	Date
Assistant Attorney General	
Michigan Department of Attorney General	
Criminal Division	0/4 1
3030 W. Grand Blvd Cadillac Place, Suite 10-200	
Detroit, MI 48202	Judge/Magistrate/Clady V/I
313-456-0180	Judge/Magistrate/Clerk Bar no
Security for costs posted	

# Exhibit W 2014-NA-0085

STATE OF MICHIG 36 JUDICIAL DISTF 3RD JUDICIAL CIRC	RICT	COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT CTN: 96-14900541-01 MSP#.
District Court ORI: MI82	0365J ci	cuit Court ORI, MI- MI821095J	AG ORI MI820025A 2 / 3
THE PEOPLE OF T	HE STATE OF MICHIGA	AN	Victim or complainant
v	•		STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY
LAKITA KENYETTA	MILLER		Complaining Witness
133 STANLEY AVE MARYVILLE, TN 37	7803		S/A MARK KACHAR S/A CHARLES BRADLEY
Co-defendant(s)			Date: On or about 07/01/2011 - 01/31/2012
Cily/Twp./Village DETROIT	County In Michigan WAYNE	Defendant SID	Defendant DOB 9/27/1976
Charge(s) See Below			Maximum Penalty See Below

### STATE OF MICHIGAN, COUNTY OF WAYNE

The comptaining witness says that on the date above and allor 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). [421.54BilA]

The complaining witness asks that defendant be apprehended a	nd dealt with according to law
Warrant authorized on <u>1/22/14</u> by:	Complaining witness signature
MA-burt	Subscribed and sworn to before me on
Denise M. Hart (P45127) Assistant Attomey General	pate /
Michigan Department of Attorney General	611/ ··· - 1
3030 W. Grand Blvd Cadillac Place, Suite 10-200	WECTI 191
Detroil, MI 48202 313-456-0180	Judge/Magistrate/Clerk Bar no
Security for costs posted	

# Exhibit X 2014-NA-0086

STATE OF MICHIGA 36 JUDICIAL DISTR 3RD JUDICIAL CIRC	CUIT	COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 95-14900549-01 MSP#:
District Court ORI M1820	0365J Circ	zu4 Court ORI: MI- MI821095J	AG ORI: "M/820025A / U
	HE STATE OF MICHIGA	N	Victim or complainant: STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY
AISHA DELANE WIL 26428 FRANKLIN PO SOUTHFIELD, MI 48	DINTE DR	Complaining Witness S/A CHARLES BRADLEY S/A MARK KACHAR	
Co-defendant(s)			Date On or about 02/28/2009 - 07/31/2012
City/Twp.//illage DETROIT	County in Michigan WAYNE	Defendant SID	Defendant DOB 4/14/1979
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]

The complaining wilness asks that defendant be apprehended a	and dealt with according to law.
Warrant authorized on 4-22-14 by:	Complaining witness signature
my-terrt	Subscribed and swom to before me pn
Denise M. Hart (P45127) Assistant Attorney General	(Date
Michigan Department of Attorney General	
Criminal Division 3030 W. Grand Blvd Cadillac Place, Suite 10-200	1 (MATI 1771
Detroit, MI 48202 313-456-0180	Judge/Magistrale/Clark Bai no
Security for costs posted	

# Exhibit Y 2014-NA-0087

STATE OF MICHIG 36 JUDICIAL DISTF 3RD JUDICIAL CIR	RICT	COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 96-14900528-01 MSP#:
District Court ORI: M182	0365J Cir	cuil Court ORI MI-MI821095J	AG ORI: MI820025A
THE PEOPLE OF T	HE STATE OF MICHIGA	AN	Victim or complainant.
V			STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY
DAMIEN WILLIAMS 8971 MILNER STRE DETROIT, MI 4821:	ET		Complaining Wilness S/A CHARLES BRADLEY S/A MARK KACHAR
Co-defendant(s)			Date: On or about 07/01/2011 - 02/28/2012
City/Twp /Village DETROIT	County In Michigan WAYNE	Defendant SID	Defendant BOB 3/19/1974
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). [421.54BilA]

The complaining witness asks that defendant be apprehended and d	lealt with according to law
Warrant authorized on 4-22-14 by.  Date  The hart	Complaining writness signature
Denise M. Hart (P45127) Assistant Attorney General	Subscribed and sworn to before me on
Michigan Department of Attorney General Criminal Division 3030 W. Grand Blvd. Cadillac Place, Suite 10-200 Detroit, MI 48202	Chl (5791
313-456-0180  Discourity for costs posted	Judge/Magistrate/Clerk Bar no

### Exhibit Z 2014-NA-0088

36 JUDICIAL DISTR 3RD JUDICIAL CIRC	ICT	COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT. CTN: 96-14900571-01 MSP#:
District Court ORI: MI820	)365J Cin	cuit Court ORI MI-MI821095J	AG ORI MI820025A
THE PEOPLE OF TH	HE STATE OF MICHIGA	N	STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY
TANYA RENEE WOO 2190 VERNIER ROA GROSSE POINTE W	D		Complaining Witness S/A MARK KACHAR S/A CHARLES BRADLEY
Co-defendant(s)			Date On crabout 04/01/2011 - 01/30/2012
City/Twp:/Village DETROIT	County in Michigan WAYNE	Defendant SID	Defendant DOB 3/15/1960
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]

The complaining witness asks that defendant be apprehend	ed and dealt with according to law
Warrant authorized on 4/24/14 by:  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  Decurity for costs posted	Complaining witness signature  Subscribed and sworn to before me on
La Security for costs posted	

### Exhibit AA 2014-NA-0094

		2014-NA-0094	
STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT		COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 96-14900567-01 MSP#.
District Court ORI: MI820365	J Circu	it Court ORI MI-MI821095J	AG ORI : MI820025AJ J 9
THE PEOPLE OF THE S	TATE OF MICHIGAN		Victim or complainant: STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY
ROSALIND KAY MILLS 16267 ROSSINI DRIVE DETROIT, MI 48224			Complaining Witness S/A CHARLES BRADLEY S/A MARK KACHAR
Co-detendani(s)	1		Date, On or about 11/01/2007 - 09/30/2012
City/Twp://illage DETROIT	County in Michigan WAYNE	Defendant SID	Defendant DOS 6/25/1971
Charge(s) See Below			Maximum Penalty See Below
STATE OF MICHIGAN, C The complaining witness s	OUNTY OF WAYNE says that on the date :	above and at/or in the City of Detro	pit, the defendant, contrary to law,
OF \$1,000 TO \$25,000			TEMENT/MISREPRESENTATION - LOSS
payment under the Mich more but less than \$25,	nigan Employment ( 000; contrary to MC	Security Act for herself, the am CL 421,54(b)(ii)(A). [421,54BH/	er to obtain or increase a benefit or other ount improperly obtained, being \$1,000 or A}
MISDEMEANOR: 4 tim	es the amount of fr	aud and 1 Year, or community	service for up to 1 Year but not to exceed

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

2,080 hours, or a combination of imprisonment and community service not to exceed 1 Year

Warrant authorized on 4/34/14 by TMH/WY

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

Complaining witness signature

Subscribed and sworn to before me on.

Judge/Magistrate/Clerk

# Exhibit AB 2014-NA-0095

STATE OF MICHIGA 36 JUDICIAL DISTRI 3RD JUDICIAL CIRC	СТ	COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 96-14900574-01 MSP#,
District Court ORI, MI820	365J Ckc	ult Court ORI, MI- MI821095J	AG ORI MI820025A
THE PEOPLE OF TH	E STATE OF MICHIGA	N	STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY
SHAYLA LINDSEY B 12675 MONTE VISTA DETROIT, MI 48236			Complaining Witness S/A MARK KACHAR S/A CHARLES BRADLEY
Co-defendani(s)			Date On or about 01/30/2011 - 09/30/2012
Cily/Twp Millage DETROIT	County in Michigan WAYNE	Defendant SID	Defendant DOB 12/5/1976
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]

The complaining withess asks that defendant be apprehended	ed and dealt with according to law.
Warrant authorized on HIHH by:  Denise M. Hart (P45127) Assistant Attorney General Michigan Department of Altorney General 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

# Exhibit AC 2014-NA-0096

STATE OF MICHIG 36 JUDICIAL DISTR 3RD JUDICIAL CIRC	RICT	COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 96-14900565-01 MSP#:
District Court ORI: MI82	0365J Cir	cuit Court DRI: MI- MI821095J	AG ORI: MI820025A
THE PEOPLE OF T	HE STATE OF MICHIGA	AN	STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY
CAMMIE CALVIN RI 18628 BUFFALO ST DETROIT, MI 48234	REET		Complaining Witness S/A MARK KACHAR S/A CHARLES BRADLEY
Co-delendant(s)			Date: On or about 04/01/2009 -07/31/2012
City/Twp /Village DETROIT	County in Michigan WAYNE	Defendant SID	Defendant DOB 8/26/1980
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). [421.54BIA]

The compaining witness asks that delendant be apprehende	d and dealt with according to law
Warrant authorized on 4/34/14 by:	· Mahly
Date	Complaining witness signature /
M4 tur	Subscribed and sworn to before me on 44444
Denise M. Hart (P45127)	(Date
Assistant Attorney General	
Michigan Department of Attorney General	1 / A
Criminal Division	
3030 W. Grand Blvd. Cadillac Place, Suite 10-200	
Detroit, Mt 48202	Judge/Magistrate/Clerk Bar nd
313-456-0180	A2-11-2-11-2-11-2-11-11-11-11-11-11-11-
Security for costs posted	

### Exhibit AD 2014-NA-0097

STATE OF MICHIGA 36 JUDICIAL DISTRI 3RD JUDICIAL CIRC	CT	COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 96-14900575-01 MSP#:
District Court ORI MI820	0365J Cin	cuit Court ORI MI-MI821095J	AG ORI: MI820025A
THE PEOPLE OF TH	IE STATE OF MICHIGA	N	STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY
LASEAN LAVAYE M 103 LAKE VILLAGE DEARBORN, MI 481 Co-defendant(s)	BLVD APT 206 DEARE	ORN	Complaining Wilness 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	Defendant DOB 4/25/1972
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]

The complaining witness asks that defendant be apprehended	and dealt with according to law
Warrant authorized on 4/7-4/14 by:	Complaining witness signature
Denise M. Hart (P45127) Assistant Attorney General Michigan Department of Attorney General Criminal Division	Subscribed and sworn to before me on
3030 W. Grand Blvd. Cadillac Place, Suite 10-200 Detroit, MI 48202 313-456-0180  Security for costs posted	Judge/Magistrate/Clerk Bar no

### Exhibit AE 2014-NA-0101

STATE OF MICHIGAN DISTRICT: 36 JUDICIAL DISTRICT COMPLAINT CIRCUIT: 3RD JUDICIAL CIRCUIT CTN: 96-14900573-01 MISDEMEANOR MSP#: District Court ORI: MI820365J Circuit Court ORI MI- MIB21095J AG ORI: MI820025A Victim or complainant: THE PEOPLE OF THE STATE OF MICHIGAN STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY MARK ALAN JACKSON Complaining Witness **52104 NOTTINGHAM CT** S/A CHARLES BRADLEY CHESTERFIELD, MI 48051 S/A MARK KACHAR Co-defendant(s) Date: On or about 01/01/2010 - 06/30/2012 City/Twp./Village County in Michigan Defendant SID Defendant DOB DETROIT WAYNE 5/21/1967 Charge(s) Maximum Penalty See Below 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]

The complaining witness asks that defendant be apprehended	od and dealt with according to law.
Warrant authorized on 4/24/14 by:	· Gladella
mars	Complaining witness signature  Subscribed and swom to before me on
Denise M. Hart (P45127) Assistant Altomay General	Data
Michigan Department of Attorney General Criminal Division	(, 0,
3030 W. Grand Blvd Cadillac Place, Suite 10-200 Detroit, MI 48202	La Car
313-456-0180	Judge/Magistrate/Clerk Bar no
Security for costs posted	

### Exhibit AF 2014-NA-0102

STATE OF MICHIGA 36 JUDICIAL DISTR 3RD JUDICIAL CIRC	ICT	COMPLAINT MISDEMEANOR	DISTRICT: CIRCUIT: CTN: 96-14900569-01 MSP#:
District Court OFU: M1820	0365J CI	rcuit Court ORI: MI- MI821095J	AG ORI: MI820025A
THE PEOPLE OF THE STATE OF MICHIGAN			Victim or comptainant:
v			STATE OF MICHIGAN UNEMPLOYMENT INS AGENCY
<del>-JUANITA ELAINE AUSTIN-</del> JACKSON 14020 NORTHLAWN STREET			Complaining Witness
DETROIT, MI 48238 Co-defendant(s)			S/A CHARLES BRADLEY S/A MARK KACHAR
			Date: On or about 12/01/2010 - 12/31/2011
City/Twp_Millage DETROIT	County in Michigan WAYNE	Defendant SiD	Defendant DOB 5/24/1958
Charge(s) See Below			Maximum Peneky 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]

The complaining witness asks that defendant be apprehended an	d dealt with according to law.
Warrant authorized on 4/24/14 by:	- Alphyling
Dala May	Comptaining witness signature  4/44//
Denise M. Hart (P45127) Assistant Attorney General Michigan Department of Attorney General	Subscribed and sworn to before me on
Criminal Division 3030 W. Grand Blvd. Cadillac Place, Suite 10-200 Detroit, MI 48202	- CIRC TITES
313-456-0180  Disecurity for costs posted	Judge/Magistrate/Clark Bar no.