

STATE OF MICHIGAN  
IN THE MICHIGAN SUPREME COURT

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PEOPLE OF THE STATE OF MICHIGAN,  
Plaintiff-Appellee,

-vs-

Michigan Supreme Court No. 159346

JACQUES JEAN KABONGO,  
Defendant-Appellant.

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Court of Appeals No. 338733  
Wayne County Circuit Court No. 16-010745-01-FH

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PLAINTIFF-APPELLEE'S ANSWER OPPOSING  
DEFENDANT-APPELLANT'S  
APPLICATION FOR LEAVE TO APPEAL

KYM L. WORTHY  
Prosecuting Attorney  
County of Wayne

JASON W. WILLIAMS  
Chief of Research, Training,  
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The People of the State of Michigan – through Kym L. Worthy, Prosecuting Attorney, County of Wayne, Jason W. Williams Chief of Research, Training, and Appeals, Deborah K. Blair, Assistant Prosecuting Attorney – hereby ask this Honorable Court to deny the Defendant-Appellant's application for leave to appeal.

1. The Defendant's application for leave to appeal relies on the same arguments made in the Michigan Court of Appeals.
2. The People's brief to the Michigan Court of Appeals adequately addresses these issues, and is incorporated in this answer.<sup>1</sup>
3. The Michigan Court of Appeals did not clearly err in rejecting the Defendant's arguments and affirming his convictions.<sup>2</sup>

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1. See Appendix 1.  
2. MCR 7.302(B)(5).

4. The Defendant's application for leave to appeal does not demonstrate any of the other grounds for granting leave to appeal.<sup>3</sup>
5. In sum, the Defendant's application for leave to appeal raises no issues worthy of this Honorable Court's review, and it should be denied.

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3. MCR 7.302(B)(1)-(3).

**RELIEF REQUESTED**

THEREFORE, the People respectfully request that this Honorable Court deny the Defendant-Appellant's application for leave to appeal.

Respectfully submitted,

KYM L. WORTHY  
Prosecuting Attorney  
County of Wayne

JASON W. WILLIAMS  
Chief of Research, Training,  
and Appeals

*/s/ Deborah K. Blair*

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Dated: April 8, 2019

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PEOPLE OF THE STATE OF MICHIGAN,  
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-vs-

Michigan Supreme Court No. 159346

JACQUES JEAN KABONGO,  
Defendant-Appellant.

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Court of Appeals No. 338733  
Third Circuit Court No. 16-010745-01-FH

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Appendix 1  
The People's Brief to the Michigan Court of Appeals

KYM L. WORTHY  
Prosecuting Attorney  
County of Wayne

JASON W. WILLIAMS  
Chief of Research, Training,  
and Appeals

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