

STATE OF MICHIGAN  
IN THE MICHIGAN SUPREME COURT

IN THE MATTER OF TYLER DIEHL, Minor.  
\_\_\_\_\_ /

PEOPLE OF THE STATE OF MICHIGAN,

Petitioner-Appellant,

-vs-

TYLER DIEHL,  
\_\_\_\_\_ /

Respondent-Appellee.

Supreme Court No.  
160457

Court of Appeals  
No. 345672

Oakland Circuit Court  
Family Division  
No. 2017-855352-DL

**PETITIONER-APPELLANT'S REPLY TO  
APPELLEE'S SUPPLEMENTAL BRIEF**

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## **COUNTER-STATEMENT OF MATERIAL PROCEEDINGS AND FACTS**

In Respondent's supplemental brief, two factually based statements need to be corrected. First, on pages 11-12 of his supplemental brief Respondent alleges that the Prosecutor's attempts to have Respondent detained as a result of his delinquency cases were both "barbaric" and an "example of punishment," however the facts underlying these requests contradict this claim. While Respondent was young when he first entered the family court system, he was initially arrested for physically attacking his mother, causing injuries including various cuts, scrapes and contusions to her arms, legs, and head, and fresh blood running down her legs and arms. Because of his brutal assault, his mother was forced to call 911 to protect herself and her other child from Respondent. (46a) As the record shows, the request to detain Respondent after this assault was not to punish him, but to both protect his family and Respondent himself, as the police had been previously called to their residence five other times to address Respondent's out of control behavior. (54a-55a)

The family court denied Appellant's request to detain Respondent in a residential facility after the first domestic violence delinquency case, and Respondent was released to his mother after the preliminary hearing on the first delinquency case. Less than 24 hours after Respondent's release from custody he was again taken into custody by police for again assaulting his mother. The second domestic violence incident was different than the first, because mother was unable to call the police, after Respondent punched her in the stomach, which knocked her to the ground, and then began kicking/stomping on his mother. Fortunately for the family, a neighbor was outside when the assault occurred, observed Respondent's attack on his mother, and then called the police. (69a) In light of the ongoing (despite court intervention) nature of Respondent's behavior, and the danger that Respondent's behavior posed to his family and himself, Appellant's initial requests to detain Respondent in a secure residential facility were neither barbaric nor punitive, but instead were done in an attempt to protect the health and welfare of both Respondent's family and himself.

The second inaccurate factual statement made by Respondent is the unsupported claim, made on page 32 of his supplemental brief, that there was no point undoing the family court's dismissal of the two delinquency cases subject to the pending appeal because Respondent had been discharged from court supervision with no further contacts with law enforcement; with Respondent specifically (and incorrectly) alleging to this Court that "the juvenile has successfully completed probation on the first adjudicated petition, was not violated and has not had any contact with law enforcement since." *Id.* As the underlying family court record reflects, and as briefly noted in footnote 3 of Appellant's application, the family court still has jurisdiction over Respondent, and Respondent has had numerous contacts with law enforcement since the first delinquency petition case. Since this appeal was filed, Respondent has been arrested and charged via delinquency cases for incidents including another assault on his mother and exposing himself to his therapist. As such, and contrary to Respondent's claims to the contrary, his involvement with the family court remains ongoing.

### **ARGUMENT**

**I. The Juvenile Code does not allow a family court judge to "unauthorize" and revoke a previously ordered authorization of a delinquency petition into the formal family court docket, with or without a prosecutor's objection.**

Respondent's supplemental brief on this issue primarily focuses upon the claim that section 36b of the CVRA, being MCL 780.786b, empowers family courts to dismiss any delinquency case as long as (1) notice is given, and (2) the case involves a crime victim, with an almost ancillary discussion about the Juvenile Code itself. The section of the Juvenile Code identified by Respondent as allegedly conveying to the family court the power to *sua sponte* dismiss any delinquency case formally authorized into the family court docket, for any reason, is the generic language in MCL 712A.1(3), which provides in part that the Juvenile Code should be liberally construed so that the juvenile is provided services and care conducive to the "juvenile's welfare and the best interest of the state." However, this generic language must be read in conjunction with the actual laws and rules

comprising the Juvenile Code enacted by Michigan's Legislative branch.

As noted, the Juvenile Code and accompanying Court Rules set forth the manner in which delinquency cases may be handled by a family court, including the options available to the family court to dispose of a delinquency case at the preliminary inquiry/preliminary hearing stage, i.e. *before* it has been formally authorized into the family court docket. These options include denying the authorization of the petition, referring the matter to alternate services under the Juvenile Diversion Act, asking that the juvenile and their parents appear before the court, placing the matter on the consent calendar (with the prosecutor's approval), or authorizing the petition and placing it on the formal family court docket. MCR 3.935(B)(3)&(7); MCR 3.932(A).<sup>1</sup>

After a juvenile delinquency petition case has been authorized, accepted for filing by the clerk of the court, and placed on the family court's formal docket, the juvenile is no longer eligible to participate in the diversionary services available before a petition is authorized. MCL 722.823(1) As such, and much in the same manner as adult criminal cases are handled after a complaint and warrant has been sworn to and authorized by a judge, the *only* procedural options available to the family court under either the Juvenile Code or the Michigan Court Rules to resolve an authorized juvenile delinquency case placed on the formal family court docket are to accept a plea to the petition, MCR 3.941, set the case for trial, MCR 3.942, or transfer the case to the consent calendar if, *and only if*, the prosecutor agrees to have the case transferred to the consent calendar. MCR 3.932(C)(1)&(2); MCL 712A.2f(3). There is *no* provision within the Juvenile Code that expressly

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<sup>1</sup> Respondent's brief makes an argument that MCL 712A.2f(10)(a) supports his claim that the family court may *sua sponte* unauthorize authorized delinquency cases that have been formally authorized onto the formal family court docket. This is not accurate, as this section addresses delinquency cases that are placed on the consent calendar (with the prosecutor's approval) *before* the petition is authorized into the formal family court docket. In that circumstance, if the family court later decides that the consent calendar is not a proper fit for the juvenile, it may transfer the case from the consent calendar to the formal calendar, to determine whether the petition should be authorized into the formal family court docket. The petitions subject to MCL 712A.2f(10)(a) are not yet authorized into the formal family court docket, so this section has no applicability to the present appeal, which addresses cases that were authorized into the formal family court docket before their improper dismissal.

authorizes a family court to “unauthorize” and then dismiss a delinquency case that had been properly authorized onto the formal family court docket, as the family court did, *sua sponte* in the present appeal, after the prosecutor did not agree to the plea bargain requests made (again *sua sponte*) by the family court judge on behalf of the Respondent.

Not only is there no provision in the Juvenile Code authorizing the family court to take such an action, but such an interpretation would directly conflict with provisions of the Code that were enacted by the Michigan Legislature. Specifically, Respondent argues that the two delinquency cases were properly dismissed because the family court already had jurisdiction over Respondent, and therefore no additional services needed to be imposed as a result of the two additional cases. The Michigan Legislature foresaw this exact scenario and included in the Juvenile Code the “warn and dismiss” disposition option contained in MCL 712A.18(1)(a); where a family court simply enters the adjudication into the family court record<sup>2</sup> and then ends the court’s jurisdiction over the juvenile as to the case(s). This section of the Juvenile Code was enacted to provide a dispositional option for family courts faced with the situation where a juvenile offender committed a charged offense but did not need further consequences imposed from the new case, as occurred in the cases underlying the present appeal. The family court erred as a matter of law when it was faced with the specific circumstance for which MCL 712A.18(1)(a) was created, was made aware of this provision of the Juvenile Code, (187a-188a) but chose to disregard and ultimately bypass this Legislatively created dispositional option and instead *sua sponte* dismiss the two formally authorized delinquency cases using the legal fiction of “unauthorizing” the cases.

The power to “unauthorize” and then dismiss any formally authorized delinquency case (or more accurately, any formally authorized delinquency case involving a crime victim, as will be addressed in the next section) not only is unsupported by the language of the Juvenile Code, but

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<sup>2</sup> Appellant will again note that adjudications in the family court are *not* criminal convictions, so the family court and Respondent’s continued claim that the adjudication of additional delinquency cases would give Respondent a “huge criminal record” is not only incorrect, but demonstrates a fundamental lack of understanding of the nature of juvenile delinquency proceedings.

this erroneous interpretation would empower family courts to bypass the provisions of the Juvenile Code enacted to *limit* the family court's ability to dismiss certain delinquency cases.

Through MCL 712A.2f(3), the Legislature amended the Juvenile Code to allow family courts to divert delinquency cases onto the "consent calendar" in a manner that allows the juvenile to avoid the entry of an adjudication on the case. This law contains a specific check against the family court's power, in that it requires the prosecutor's approval to place the case onto the consent calendar. MCL 712A.2f(3) To read an implied power into the Juvenile Code that empowers family courts to "unauthorize" and then dismiss delinquency cases that have been formally authorized onto the family court docket would allow family courts to bypass the Legislatively established checks and balances in the Juvenile Code. Such a circumstance happened in the cases underlying this appeal, as the family court only decided to "unauthorize" and then dismiss the two delinquency cases *after* the prosecutor would not commit to agreeing to allowing the cases to be placed on the consent calendar, as was requested *sua sponte* by the family court. This action not only was unsupported by the Juvenile Code, but it directly conflicted with the Legislatively enacted options in the Juvenile Code that govern the manner in which the family court should have handled these two delinquency cases.

While Respondent clings to the generic language in MCL 712A.1(3), which focuses on the "juvenile's welfare" and the "best interest of the state," as purported support for this broad dismissal power, it should be noted that no provision of the Juvenile Code even suggests that the entry of juvenile adjudications into the family court record has any impact on the "welfare" of the juvenile. To the contrary, the warn and dismiss option contained in MCL 712A.18(1)(a) addresses the very circumstance where a delinquency adjudication is entered without imposing additional consequences on the juvenile, which would not have been permitted if the entry of these adjudications negatively impacted the juvenile's welfare. The existence of this statutorily created dispositional option belies Respondent's argument that entering delinquency adjudications into the family court record, without imposing consequences for the offenses, is contrary to the Juvenile Code because it would somehow harm the juvenile's "welfare." Further, the second half of the

purpose of the Juvenile Code set forth in MCL 712A.1(3), i.e. that the Code be interpreted in a manner that is also conducive to the “best interest of the state,” is completely ignored by Respondent. However Appellant, as the litigant in these proceedings representing the state, would note that the entry of juvenile adjudications into the family court record furthers several state interests, as these adjudications can impact several state involved actions, including family court dispositions arising from future delinquency cases by the juvenile as well as future adult sentencings involving the Respondent.

**II. The section of the CVRA imposing notification *obligations* on the family courts if they dismiss or divert a delinquency cases involving crime victims does not grant family courts the power to divert and dismiss those juvenile delinquency cases that involve crime victims, while conversely shielding similarly situated delinquency cases that did not victimize individuals from this arbitrary dismissal power.**

As noted in great detail in Appellant’s brief, the CVRA was enacted to enhance the rights of crime victims, consistent with the Const 1963, art 1, § 24. MCL 780.786b was enacted to impose notification obligations upon family courts, in the event that the family court was considering dismissing a delinquency case involving a crime victim. The language addressing the types of dismissals covered by MCL 780.786b was drafted broadly, in light of the unique terminology used in juvenile proceedings, to ensure that the obligation of the court to notify crime victims applied to any type of dismissal of a delinquency case, however that dismissal may be worded. Van Regenmorter, *Crime Victims’ Rights—A Legislative Perspective*, 17 Pepperdine L R 59, 71 (1989)

The CVRA in general, and MCL 780.786b in particular, exists to enhance the rights and protections of crime victims. MCL 780.786b creates an obligation upon family courts to notify crime victims in certain circumstances; prohibiting the dismissal (regardless of the juvenile terminology used to describe the dismissal) unless the notification obligations are met. This law does not independently empower the family court to dismiss delinquency cases (or at least, delinquency cases involving a crime victim). Such an interpretation would render an absurd result by achieving the opposite of the goal intended by the Legislature, because instead of enhancing victim rights it would victimize these victims by subjecting cases involving crime victims to *sua sponte* dismissal by the courts for any

reason, while shielding similarly situated delinquency cases that did not involve crime victims from this arbitrary power. *Piccalo v Nix*, 466 Mich 861; 643 NW2d 233 (2002); *McAuley v GMC*, 457 Mich 513, 519; 578 NW2d 282 (1998). And while Respondent alleges at page 21 of his brief that this absurd result “simply does not bear out,” at pages 11-12 of Respondent’s brief he specifically argued that the family court’s dismissal of the two cases was proper, under MCL 780.786b, because the two cases involved victims and therefore were offenses subject to the CVRA.

**III. The trial court’s decision to “unauthorize” and dismiss the two delinquency cases, after the prosecutor did not agree to the plea bargain suggested by the trial court on behalf of the Respondent, encroached upon the prosecutor’s executive branch authority to make discretionary litigation decisions on the cases, and therefore violated the separation of powers doctrine.**

Respondent’s argument regarding the separation of powers doctrine appears to focus upon the claim that if section 36b of the CVRA, being MCL 780.786b, empowers the family court to dismiss the two juvenile delinquency cases over the prosecutor’s objections, then no violation of the separation of powers doctrine occurred. However, as addressed in Appellant’s supplemental brief, MCL 780.786b does *not* provide family courts with the affirmative authority to dismiss juvenile delinquency cases subject to the CVRA, i.e. delinquency cases involving crime victims. Absent such authority, the family court’s *sua sponte* dismissal of the two formally authorized delinquency cases constituted a violation of the separation of powers doctrine.

The prosecutor is a constitutional officer whose duties are as provided by law. Const 1963, art 7, § 4. This Court has recognized that “[t]he prosecution has an equal, though different [from the charged offender], constitutional interest at stake insofar as it is constitutionally entrusted with authority to charge defendants.” *People v Siebert*, 450 Mich 500; 537 NW2d 891 (1995), *citing Genesee Prosecutor v Genesee Circuit Judge* (‘*Genesee I*’), 386 Mich 672, 683-684; 194 NW2d 693 (1972). This includes a constitutionally protected right of access to the court system to resolve the cases it has charged. *People v Williams*, 186 Mich App 606; 465 NW2d 376 (1990); Const 1963, art 1, § 13.

The prosecutor, an official of the executive branch of government, exercises its discretionary authority to enforce the laws by determining which charges should be brought against an individual in a particular situation and how the cases should be litigated, so that the public interest is best served. *People v Ford*, 417 Mich 66, 91-92; 331 NW2d 878 (1982), *See People v McCracken*, 124 Mich App 711, 715; 335 NW2d 131 (1983). Courts have very limited authority to review a prosecutor's discretionary litigation decisions, the court cannot "second-guess whether a prosecutor has a 'rational basis' or 'good reason'" for the prosecutorial decision, but instead such a decision is reviewed by the court under an "abuse of power" standard, where the court limits the inquiry to "whether a prosecutor has acted in contravention of the constitution or the law." *People v Barksdale*, 219 Mich App 484, 488; 556 NW2d 521 (1996), *citing People v Morrow*, 214 Mich App 158, 161; 542 NW2d 324 (1995).

In the present case, before the family court *sua sponte* "unauthorized" and then dismissed the two formally authorized delinquency cases subject to this appeal, it began engaging in what can only be termed advocacy on behalf of Respondent. As noted even in Respondent's supplemental brief, the family court began attempting to strike a deal for Respondent, and the record is replete with requests by the family court to the prosecutor to offer a plea bargain on the cases. (182a, 184a-185a, 187a, 188a) When the family court disagreed with the discretionary decisions made by the prosecutor on the cases (i.e. refusing to commit to agreeing to allow the two cases to be placed on the consent calendar), the court simply overrode these discretionary decisions and *sua sponte* dismissed the two delinquency cases. The lower court record is clear that neither the plea bargain requests nor the dismissal of the two delinquency cases was done at the request of Respondent, but instead they were all initiated *sua sponte* by the family court judge. These dismissals fall squarely into the caselaw prohibiting courts from stepping into the shoes of the prosecutor and overriding the discretionary decisions of the executive branch prosecutor. *People v Venticinque*, 459 Mich 90, 100-101; 586 NW2d 732 (1998); *US v Batchelder*, 443 US 114, 124; 99 SCt 2198; 60 Led 2d

755 (1979); *People v Robinson (In re Robinson)*, 180 Mich App 454, 458; 447 NW2d 765 (1989); *People v Wilson (In re Wilson)*, 113 Mich App 113, 122-123; 317 NW2d 309 (1982); *People v Carey (In re Carey)*, 241 Mich App 222, 230; 615 NW2d 742 (2000). As such, the family court's dismissals should be reversed.

**IV. The trial court's *sua sponte* dismissal of the two formally authorized delinquency cases, when the prosecutor did not agree to the plea bargain suggested and advocated by the trial judge on behalf of the Respondent, constituted reversible error.**

A harmless error finding is applied when a court comes to the right result for the wrong reason, or when the error is not decisive to the outcome of the case. *Ypsilanti Fire Marshall v Kircher*, 273 Mich App 496, 529; 730 NW2d 481 (2007); *Hawkins v Department of Corrections*, 218 Mich App 523, 528; 557 NW2d 138 (1996). Respondent's argument regarding reversible error seems to focus upon the decision in *People v Lee (In re Lee)*, 282 Mich App 90; 761 NW2d 432 (2009). The *Lee* case does provide a good example of harmless error, but it does not support Respondent's position.

In the *Lee* case, the family court failed to fulfill all of the technical notification requirements imposed through MCL 780.786b, before the court held a hearing to determine whether the cases should be placed on the consent calendar (and therefore potentially be dismissed). The Court of Appeals found that while the technical requirements of MCL 780.786b were not met, each of the two victims had received notice of the hearing (with one attending the hearing and the other choosing not to attend the hearing). Further, both victims had discussed their position with the prosecutor, who advocated their positions at the hearing. In light of this, the Court of Appeals held that the error in failing to comply with the technical requirements of MCL 780.786b was harmless, because the victims were aware of the hearing, the positions of the victims were advocated to the court at the hearing, and therefore the result of the hearing would not have changed had the family court satisfied all of the specific requirements of MCL 780.786b. *Lee*, 282 Mich App at 99-100, 101-102.

While the error addressed in the *Lee* case did not change the outcome of the *Lee* case(s), the error by the family court in the present appeal unequivocally changed the outcome of the two delinquency cases underlying the present appeal, as both cases were improperly *dismissed* by the family court.

Regardless of whether additional consequences might be imposed upon Respondent as a result of these cases, the family court's dismissal of the cases prevented the prosecutor, as the representative of the state in these proceedings, from litigating the matters and securing adjudications on these cases in the family court record, something that has the potential to impact both future juvenile cases involving the Respondent as well as adult sentencings, if the state is forced to bring adult criminal charges against Respondent in the future. *See People v Nelson*, 66 Mich App 60, 66; 238 NW2d 201 (1975); *People v Smith*, 496 Mich 133, 136 & 140-141, 144; 852 NW2d 127 (2014)(The absence of additional consequences arising from the two judicially dismissed cases does not render the improper dismissals harmless). As such, the error committed by the family court, when it *sua sponte* dismissed the two formally authorized juvenile delinquency cases, was not harmless.

WHEREFORE, Jessica R. Cooper, Prosecuting Attorney in and for the County of Oakland, by Jeffrey M. Kaelin, Assistant Prosecuting Attorney, respectfully requests that this Honorable Court grant the relief requested in Appellant's application. Because this Court allowed the University of Michigan Juvenile Justice Clinic to file an amicus brief after both parties filed their supplemental briefs, and after Appellant filed the present reply to Appellee's supplemental brief, Appellant would also ask permission to file a supplemental reply brief to respond to any issues raised in their amicus brief.

Respectfully submitted,

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