

20-001894-CZ FILED IN MY OFFICE Cathy M. Garrett WAYNE COUNTY CLERK 2/6/2020 11:40 AM Debra Bynum

**STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE**

CITY OF DETROIT,
a Michigan Municipal Corporation

Plaintiff,

COMPLAINT

Hon. Timothy M. Kenny
Case No. _____ CZ

v.

STEVE AND STEPHEN HAGERMAN,
individuals,

Defendants.

In accordance with the Third Judicial Circuit Court of Michigan Docket Directive 2018-03, Plaintiff respectfully requests that the above-captioned case be assigned to the Hon. Judge Timothy M. Kenny.

There is no pending or unresolved civil action in Court arising out of the transaction or occurrence alleged in the complaint.

City of Detroit Law Department
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COMPLAINT

1. Detroit's real property market is plagued by a persistent problem—slumlords and speculators. These individuals follow an invest and neglect business model. They have acquired hundreds of low-cost residential properties city-wide, and chosen to forego legally required repairs and maintenance in order to maximize profits. Slumlords rent these properties in an unsafe and unsanitary condition, while speculators hold vacant properties in the hope that property prices will rise and generate a windfall profit. In either case, when properties deteriorate to such an extent that they can no longer serve such purposes, these individuals abandon them to foreclosure or demolition. The public is left to pay for the costs of these practices.

2. The problem of slumlords and speculators will continue to persist absent legal action. The activities of slumlords and speculators are cyclical. Slumlords and speculators buy a steady stream of low-cost properties, abandon them, and then buy more low-cost properties to replace them. The properties that are abandoned cause health issues, blight, and crime, which in turn depresses property prices. The presence of abandoned properties thus allows slumlords and speculators to continue to feed their business ambitions.

3. For these reasons and others, the Mayor of Detroit and the Chief Public Health Officer recently declared the invest-and-neglect business pursuit a public nuisance, and directed the City of Detroit Law Department to take all necessary and appropriate measures to abate its presence (see Exhibit 1 – Joint Declaration of a Public Nuisance by the Mayor and the Chief Public Health Officer). This lawsuit is a direct response to that declaration. Without legal intervention, slumlords and speculators will continue to harm Detroit’s residents.

PARTIES, JURISDICTION, AND VENUE

4. Plaintiff the City of Detroit is a Michigan Municipal Corporation.

5. Defendant Stephen Hagerman is a resident of the Charter Township of West Bloomfield, Michigan. He is the Chief Executive Officer of Brick Home Management, a Michigan Limited Liability Company (LLC).

6. Defendant Steve Hagerman is a resident of the Charter Township of West Bloomfield, Michigan. He is the manager of Brick Home Management.

7. Defendants Steve and Stephen Hagerman own, operate or control BRICK HOME RENTALS, LLC, a Michigan LLC, DETROIT MOTOR CITY FUND, LLC, a foreign LLC, MLC RENTALS L.L.C., a Michigan LLC, MOTOWN

RENTALS L.L.C., a Michigan LLC, OWN HOME L.L.C., a Michigan LLC, UNIQUE HOME RENTALS, LLC, a Michigan LLC, and WESTSIDE BRICK, LLC, a Michigan LLC.

8. Defendants possess or control more than 600 properties in the City of Detroit. They regularly conduct business in the City buying, selling, and leasing real property.

9. This Court has personal jurisdiction over Defendants under MCL 600.701 and MCL 600.705.

10. This Court has subject matter jurisdiction to hear this action and award all requested relief under MCL 600.601, MCL 600.605, and MCL 600.2940.

11. This Court is the proper venue under MCL 600.1621. Defendants conduct business in Wayne County, and Wayne County is the county in which the injury occurred and where the properties are located.

FACTS

12. Over many years, Defendants have acquired a large number of real properties in the City of Detroit. In the process, they have established a series of business entities and transferred ownership of the properties to these companies.

Through these entities, Defendants possess or control hundreds of properties city-wide (see Exhibit 2 for a partial list based on information currently available to the City). Due to this convoluted web of ownership, it is hard to establish the exact number. It could be over a thousand.

13. Defendants are in the realty business, and they possess or control these properties in pursuit of this trade. They rent some of their properties to generate short-term returns. They hold others vacant. Defendants have been in this business for many years. They are experienced realtors.

14. Because properties maintained in an unsafe and unsanitary condition affect the public's health and safety, numerous laws regulate Defendants' business. These laws include the Housing Law of Michigan, which sets out minimum property maintenance requirements applicable state-wide. MCL 125.408. The Housing Law regulates water supply, MCL 125.472, fire prevention, MCL 125.482, and overall cleanliness, MCL 125.474, among other things. It was adopted "for the protection of health, welfare and safety of" Michigan residents. MCL 125.408.

15. The Detroit City Code also regulates Defendants' business. Pertinently, Detroit's property maintenance code applies to all properties located within the

City's limits. The property maintenance code sets standards for vacant buildings in addition to rental accommodations. Detroit City Code, § 8-15-81 through § 8-15-100, and § 8-15-113. It regulates the interior and exterior of properties, as well as the surrounding curtilage. § 8-15-101 through 8-15-200. The property maintenance code was enacted to "ensure the public health, safety, and welfare insofar as they are affected by the continued occupancy and maintenance of buildings, premises, and structures within the City." § 8-15-14.

16. These housing laws are not new; they have existed for many years. Defendants, investors with significant experience in the real-estate industry, know full well that these laws exist. Indeed, Defendants have been cited numerous times by the City for breaking these laws.

17. Nevertheless, Defendants operate their business in violation of these laws. This is because Defendants pursue an invest-and-neglect business strategy. Defendants are simultaneously slumlords and speculators—large scale real-property owners who, for the sake of profiteering, use their properties without regard for the laws governing their business. As a result, many of the properties they possess or

control are maintained in an unsafe and unsanitary condition, wracked with maintenance issues that harm Detroit's residents.

18. At some of Defendants' properties, the list of property maintenance code violations is long. Their properties feature overgrown gardens and dilapidated fences; cracked windows and broken doors; and unsafe and unsanitary plumbing. The properties are improperly heated and ventilated—an obvious danger during frigid Michigan winters—and have accumulated solid waste. § 8-15-101 through § 8-15-520. The list is not exhaustive, and Defendants' properties continue to deteriorate due to a lack of maintenance and repair.

19. The property maintenance code requires residential landlords to register all rental properties, complete property inspections, obtain lead clearance reports, and secure Certificates of Compliance. § 8-15-81 through § 8-15-83. However, Defendants knowingly possess or control occupied rental properties without adhering to these requirements.

20. The property maintenance code also requires landlords to maintain vacant properties in accordance with minimum standards. § 8-15-113. This includes ensuring that such properties are closed to the elements, secured from trespass, and

do not otherwise present a danger to the public. *Id.* Yet here too, Defendants knowingly possess or control vacant properties in violation of these requirements.

21. Defendants' invest-and-neglect business threatens the public's health and safety. Most damning, perhaps, is Defendants' disregard for lead-safe laws with respect to rental properties. Lead is highly toxic. There is no safe limit in humans, and lead poisoning in children leads to irreversible damage. Lead poisoning in children leads to brain and nervous system damage, slowed growth and development, learning and behavioral issues, hearing and speech problems, reduced IQ, attention deficit disorder, and problems with aggression and anger management. Children who suffer from lead poisoning are more likely to perform poorly in school, require special education, and earn less later in life. They are also more likely to be associated with violent crimes as they grow older. The City's requirement that rental properties obtain a lead clearance before being occupied is a direct response to the public threat posed by lead poisoning.

22. Defendants' invest-and-neglect business also causes increased blight and crime in Detroit's neighborhoods. Once Defendants' properties deteriorate to such an extent that they no longer serve a useful purpose, they abandon them.

Abandoned properties become blighted, and blighted properties become safe havens for unlawful activity such as prostitution and drugs. Abandoned properties are also more likely to catch fire. Thus, Defendants behavior negatively affects the quality of life for all Detroiters, not just their tenants.

23. For these reasons and others, the Mayor of Detroit and the Chief Public Health Officer recently declared the invest-and-neglect business model adopted by slumlords and speculators, like Defendants, a public nuisance and directed the City of Detroit Law Department to take all appropriate and necessary measures to abate its presence (see Exhibit 1 – Joint Declaration of a Public Nuisance by the Mayor and the Chief Public Health Officer). There is also a long-standing City ordinance declaring all properties in violation of the property maintenance code a public nuisance. Detroit City Code § 8-15-46.

24. In an effort to curtail their activities, the City has fined Defendants on countless occasions. In the past year alone, the City issued approximately 250 property maintenance violation notices relating to Defendants' properties. These fines have amounted to thousands of dollars. Defendants are fully aware of these significant maintenance issues. But individual violation notices have done nothing

to change Defendants' behavior. Of the hundreds of properties owned by Defendants, the City believes that the vast majority are not now and never have been in compliance with applicable housing laws. In some instances, Defendants' properties have been so dilapidated that they have been declared dangerous and demolished. Individual violation notices have proven inadequate to secure Defendants' compliance with the law.

25. The City and its residents are harmed by Defendants' invest-and-neglect business. By failing to comply with lead-safe rental laws, Defendants are increasing the number of children with lead poisoning, forcing the City to provide services for these children and their families. Moreover, the City is left to pay for the problems caused by blighted and abandoned buildings, whether through demolition or an increased police and fire presence. Finally, Defendants' actions continue to depress Detroit's property market, as the presence of inadequately maintained, blighted properties depresses the value of nearby homes. Lower property values, in turn, affect the City's property tax base.

26. Defendants' conduct is unreasonable—it is not up to them whether or not to comply with the laws that regulate their business. By choosing to disregard

these laws in pursuit of greater profits, they are significantly interfering with the public's health, safety, peace, comfort, and convenience. At a minimum, Defendants know, or should know, that they are producing a long-lasting significant effect on these rights. They are not engaged in capitalism; their business is exploitation. Detroit's residents deserve better.

COUNT I – PUBLIC NUISANCE

27. A public nuisance involves the unreasonable interference with a common right enjoyed by all members of the general public. It is not necessary that an entire community be affected, so long as the nuisance interferes with those who come into contact with it in the exercise of a general right. *Sholberg v. Truman*, 496 Mich. 1, 6 (2014). At its core, a public nuisance involves interference with the public's health, safety, and wellbeing. *Bonner v. City of Brighton*, 495 Mich. 209, 229 (2014).

28. A public nuisance arises from the use of property. A person need not be the legal owner of a property to be liable for a public nuisance; a person need only have possession or control of the property and be aware of the nuisance condition or activity. *Sholberg*, 496 Mich. at 6.

29. The City has the authority to declare business pursuits and property conditions that affect the public's health, safety, and welfare a public nuisance. MCL 125.486; Detroit City Code § 16-2-4. The City has declared that properties not in compliance with the property maintenance code are a public nuisance. The City has also declared that the invest-and-neglect business pursuit is a public nuisance.

30. Defendants possess or control hundreds of properties in the City. The vast majority, if not all, are in violation of the property maintenance code and present a threat to the public's health, safety, and welfare. Defendants are aware of the condition of these properties. These properties are a public nuisance.

31. Defendants are slumlords and speculators—they follow an invest-and-neglect business model to profiteer. They possess or control hundreds of properties and fail to maintain these properties in accordance with the laws governing their business—including lead abatement laws. This presents a threat to the public's health, safety, and welfare. Defendants knowingly pursue this invest-and-neglect business strategy. Defendants' business constitutes a public nuisance.

32. With public nuisances, the protection of the public is the paramount concern. This Court has the authority to order these nuisances abated and any other

equitable relief that is just and appropriate. To protect the public's health, safety and welfare, the City asks that Defendants immediately bring their properties into compliance with all applicable laws—and that they be enjoined from engaging in further property speculation until all properties they possess or control comply with the law.

RELIEF REQUESTED

33. A declaration that Defendants' business pursuit constitutes a public nuisance.

34. A declaration that Defendants' portfolio of properties constitutes a public nuisance.

35. An order that Defendants maintain all rental properties in accordance with all applicable laws, including immediately registering any rental properties possessed or controlled; completing lead inspections and risk assessments; obtaining lead clearances; completing building inspections, and obtaining certificates of compliance.

36. An order that Defendants maintain all vacant properties possessed or controlled in accordance with all applicable laws.

37. An order prohibiting Defendants from directly or indirectly buying, selling, managing, or renting additional properties in Detroit until they adhere to the above orders.

38. An order holding Defendants in contempt if they fail to comply with the above orders within a reasonable period, as determined by the Court, and any associated relief that is just and appropriate.

39. An order appointing a receiver at Defendants' expense to carry out the above orders, if Defendants fail to comply within a reasonable period as determined by the Court.

40. Any other relief that is just and appropriate.

JURY DEMAND

41. The City of Detroit requests a jury trial for all triable issues.

Respectfully submitted,

/s/ Hallam Stanton

City of Detroit Law Department

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February 6, 2020

EXHIBIT 1

JOINT DECLARATION OF A PUBLIC NUISANCE BY THE MAYOR AND THE CHIEF PUBLIC HEALTH OFFICER

The Mayor and the Chief Public Health Officer issue the following findings and declaration:

FINDINGS

A. The City of Detroit has a crisis - thousands of children living in the City suffer elevated blood lead levels as a result of living in properties with lead hazards.¹ Federal, state and local laws require property owners to take precautions to protect against childhood lead exposure.² Many landlords do not comply with these laws, and the failure to abate lead hazards has created this crisis. Elevated blood lead levels in children cause developmental issues and are associated with other life-long complications.³ Each case is a tragedy for the child, his or her family, and the City, State and Federal authorities that must provide services for these individuals.⁴

¹ Mich. Department of Health and Human Services, 2017 Provisional Annual Report on Childhood Lead Testing and Elevated Levels 8 (Oct. 2018).

² Detroit City Code § 8-15-91 through § 8-15-98; Mich. Department of Health and Human Services, Lead Poisoning Prevention, Policies and Laws <<https://www.michigan.gov/lead/0,5417,7-310-84215---,00.html>> (accessed on Jan. 13, 2020).

³ Centers for Disease Control and Prevention <<https://www.cdc.gov/features/leadpoisoning/index.html>> (accessed on Jan. 13, 2020).

⁴ Cf. Every \$1 invested to reduce lead hazards benefits society by up to \$221. American Academy of Pediatrics, Prevention of Childhood Lead Toxicity 5 (2016).

B. Several factors have contributed to the crisis. Some property owners have limited resources and cannot afford to implement lead abatement at their properties. The City is investigating avenues for providing assistance to these individuals. However, the City is also aware that many property owners have adequate financial resources to abate the lead hazards in their properties and simply choose not to do so for the sake of profits. These property owners are better known as slumlords,⁵ and they have acquired thousands of properties in the City of Detroit since the early 2000s. Slumlords now own large volumes of property city-wide. Some possess or control portfolios that contain hundreds of properties.⁶

C. Slumlords pursue an invest-and-neglect business strategy. Once acquired, slumlords do not maintain or use their properties in accordance with state and local housing laws.⁷ These laws safeguard the public's health and safety. In violation of these laws, slumlords rent or lease properties for as much money as possible, and do so without regard for

⁵ Black's Law Dictionary (11th ed.) (defining slumlord as a real-property owner who rents substandard housing and allows it to deteriorate for the sake of profit).

⁶ Akers & Seymour, Neighborhood Instability and Blight in Detroit's Neighborhoods, Poverty Solutions at the University of Michigan 7–13 (Jul. 2019).

⁷ MCL 125.401 through 543; Detroit City Code § 8-15-1 through § 8-15-503.

the health, safety, and wellbeing of their tenants. Profiteering is their primary goal, regardless of the consequences.

D. Slumlords are not the only ones to utilize the invest-and-neglect strategy. Property speculators also pursue the same business model. They acquire properties at low cost, hold them vacant, and do not maintain them in accordance with state and local housing laws. Speculators hold these properties in the hope that property prices will rise and deliver a windfall profit when sold. In the meantime, their properties fall into a state of disrepair. As with a slumlord, speculators are fueled by the same motive: profiteering without regard for the risk posed to the public.

E. The invest-and-neglect strategy causes blight and crime—another major problem in Detroit. Property speculators choose not to put their properties into productive use and leave them vacant. The slumlords who rent their properties (in violation of state and local laws) often let them deteriorate to such an extent that they can no longer serve a useful

purpose. At that point, slumlords abandon them.⁸ Vacant and abandoned properties become blighted.⁹

F. Blighted properties, in turn, become dangerous and safe havens for unlawful activity, such as prostitution and drugs.¹⁰ Blighted properties are also at higher risk of catching fire. Whether through demolition or an increased police presence, the City is left to pay to address these problems. Thus, the public has become an unwitting supporter of the invest-and-neglect business model.

DECLARATION OF NUISANCE AND DIRECTION TO ABATE

1. Under § 16-2-4 of the Detroit City Code, and § 125.486 of Michigan's Compiled Laws, the City's Public Health Director and Mayor may declare any business pursuit or property a public nuisance if, in the opinion of the Public Health Director or the Mayor, the business pursuit or property is dangerous or detrimental to the public's health and safety.

2. A public nuisance is a condition or activity that unreasonably interferes with a right common to all members of the public.¹¹ This

⁸ See note 6, *supra*, at 7–13.

⁹ Detroit City Code § 22-1-1.

¹⁰ Detroit Land Bank Authority, Nuisance Abatement, Common Exhibit C <https://s3.us-east-2.amazonaws.com/dlba-production-bucket/Nuisance_Abatement/NAP+Common+Exhibit_C+01182018.pdf> (accessed on Jan. 13, 2020).

¹¹ *Sholberg v. Truman*, 496 Mich. 1, 6 (2014).

includes a business pursuit or property if it significantly interferes with the public's health, safety, peace, comfort, or convenience.¹²


3. In the opinion of the Mayor and the Chief Public Health Officer, the invest-and-neglect business pursuit is a public nuisance. Slumlords who fail to comply with applicable housing laws and regulations, in particular with lead abatement laws and regulations, at the many properties they possess or control, significantly interfere with the public's health, safety, peace, comfort, and convenience. Similarly, property speculators who fail to maintain their properties also significantly interfere with the public's health, safety, peace, comfort, and convenience. The invest-and-neglect business pursuit detrimentally affects the lives of Detroiters throughout the City, including by interfering with Detroiters' health, safety, peace, comfort, and convenience in and about the homes in which they reside.

4. The invest-and-neglect business pursuit presents a danger to the public's health and safety, and is detrimental to the life of Detroit residents. The invest-and-neglect business pursuit is hereby declared a public nuisance.

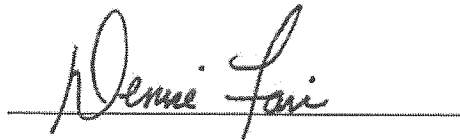
¹² State v. McQueen, 293 Mich. App. 644, 674 (2011).

5. This declaration is given immediate effect. The City of Detroit Law Department is authorized and directed to use all appropriate and necessary measures to abate the nuisance and thereby protect the health and safety of the City's residents.

Approved by:

A handwritten signature in dark ink, appearing to read "MD", is written over a horizontal line.

Mayor Mike Duggan

A handwritten signature in dark ink, appearing to read "Denise Fair", is written over a horizontal line.

Denise Fair
Chief Public Health Officer.

Dated: January 30, 2020

EXHIBIT 2

Street Address	Zip Code
22233 LYNDON	48223
19446 ASBURY PARK	48235
10655 MEUSE	48224
4427 CASPER	48210
19958 BRAILE	48219
19447 HUNTINGTON	48219
17335 WINSTON	48219
12089 ELMDALE	48213
4631 FRENCH RD	48213
2658 HARDING	48214
10675 STRATMANN	48224
3994 TOWNSEND	48214
19516 ASHTON	48219
3789 MONTCLAIR	48214
5720 FISCHER	48213
19378 EDINBOROUGH	48219
3831 FAIRVIEW	48214
3778 GARLAND	48214
11711 GRAYTON	48224
19336 STRASBURG	48205
4797 BELVIDERE	48214
7729 E CANFIELD	48214
14176 BENTLER	48223
15330 PATTON	48223
9535 PREST	48227
12395 ROSELAWN	48238
5230 NEFF	48224
14920 LONGVIEW	48213
4774 HURLBUT	48213
3473 FAIRVIEW	48214
4840 CRANE	48213
15350 GREYDALE	48223
19350 ROSEMONT	48219
19323 GLASTONBURY	48219
18775 GRANDVILLE	48219

Street Address	Zip Code
18590 HUNTINGTON	48219
12763 ILENE	48238
5283 CHALMERS	48213
14287 WILSHIRE	48213
18776 SUNDERLAND RD	48219
15344 PINEHURST	48238
12030 WISCONSIN	48204
11929 RIAD	48224
20161 GALLAGHER	48234
14256 OHIO	48238
18551 APPLETON	48219
14463 BRAMELL	48223
19460 BRAILE	48219
19450 PACKARD	48234
4380 BEACONSFIELD	48224
19625 CONCORD	48234
13551 PENROD	48223
15104 STEEL	48227
14625 INDIANA	48238
4546 LODEWYCK	48224
18925 MAINE	48234
19137 GLASTONBURY	48219
12707 STRATHMOOR	48227
5581 WAYBURN	48224
17813 BRADFORD	48205
20246 HELEN	48234
14176 PLAINVIEW	48223
11938 PAYTON	48224
9781 CAMLEY	48224
14801 SPRING GARDEN	48205
16878 LENORE	48219
11708 FORRER	48227
17395 SALEM	48219
18257 WARWICK	48219
20501 BLOOM	48234

Street Address	Zip Code
18247 FIELDING	48219
19455 DWYER	48234
16847 MURRAY HILL	48235
5530 MARSEILLES	48224
11752 NASHVILLE	48205
20479 GREELEY	48203
13990 ROSELAWN	48238
12779 STRATHMOOR	48227
3651 BUCKINGHAM	48224
20307 PELKEY	48205
20172 ROGGE	48234
19338 GABLE	48234
20155 REVERE	48234
12200 LANSDOWNE	48236
13119 GLENFIELD	48213
10841 LAKEPOINTE	48224
13895 FORDHAM	48205
14839 WISCONSIN	48238
12644 CORBETT	48213
2950 ELECTRIC	48217
14494 TROESTER	48205
4890 DEVONSHIRE	48224
15338 MANSFIELD	48227
16535 ASBURY PARK	48235
16559 ASBURY PARK	48235
16751 FORRER	48235
18215 BILTMORE	48235
20210 BILTMORE	48235
19962 ASBURY PARK	48235
11410 WAYBURN	48224
11268 LAKEPOINTE	48224
16433 MANNING	48205
16071 MANNING	48205
16201 LIBERAL	48205
16293 LIBERAL	48205

Street Address	Zip Code
14817 ROSEMARY	48213
19945 WESTPHALIA	48205
19934 WESTPHALIA	48205
20064 WESTPHALIA	48205
18716 WESTPHALIA	48205
20553 PELKEY	48205
18481 WESTPHALIA	48205
17694 TEPPERT	48234
17211 TEPPERT	48234
20112 REVERE	48234
19363 FIELDING	48219
9257 GRANDVILLE	48228
9075 GRANDVILLE	48228
12690 GRANDMONT	48227
6784 ARTESIAN	48228
6808 ARTESIAN	48228
6387 GRANDMONT	48228
7344 FAUST	48228
9540 ASBURY PARK	48227
16845 ARDMORE	48235
14312 ARDMORE	48227
14820 ARDMORE	48227
14885 APPOLINE	48227
11336 ROXBURY	48224
4683 THREE MILE DR	48224
19399 WALTHAM	48205
18096 RUNYON	48234
19032 CHICAGO	48228
16058 ELLSWORTH	48227
9300 CHEYENNE	48227
3159 EWALD CIRCLE	48238
19338 BRAILE	48219
13530 CLOVERLAWN	48238
14565 CLOVERLAWN	48238
5222 NEFF	48224

Street Address	Zip Code
9625 MCKINNEY	48224
11627 RIAD	48224
15116 GLENWOOD	48205
19200 STRASBURG	48205
19682 FLEMING	48234
13620 SANTA ROSA	48238
18264 FORRER	48235
19700 HARLOW	48235
20236 OAKFIELD	48235
19745 ARCHDALE	48235
4250 PASADENA	48238
10231 MCKINNEY	48224
12636 KELLY RD	48224
3231 TYLER	48238
2653 LESLIE	48238
3381 KENDALL	48238
5274 CHATSWORTH	48224
4642 BERKSHIRE	48224
10276 GREENSBORO	48224
15485 CEDARGROVE	48205
15419 EASTWOOD	48205
15238 SEYMOUR	48205
15582 E SEVEN MILE	48205
15826 E STATE FAIR	48205
15662 MANNING	48205
15880 PETOSKEY	48221
15820 MUIRLAND	48221
14455 FRANKFORT	48224
14773 FLANDERS	48205
13406 LONGVIEW	48213
13418 KILBOURNE	48213
14019 EDMORE DR	48205
14074 FAIRMOUNT DR	48205
14031 E STATE FAIR	48205
14023 FAIRMOUNT DR	48205

Street Address	Zip Code
13636 PINWOOD	48205
14470 FORDHAM	48205
5853 NORCROSS	48213
20248 DRESDEN	48205
19333 BARLOW	48205
20115 BARLOW	48205
19957 ALCOY	48205
20521 WALTHAM	48205
12421 E STATE FAIR	48205
18046 HICKORY	48205
19957 HICKORY	48205
19300 PELKEY	48205
19216 HICKORY	48205
5372 GARLAND	48213
5386 GARLAND	48213
12025 KENNEBEC	48205
18686 BARLOW	48205
18915 HAMBURG	48205
18653 RUNYON	48234
5846 CRANE	48213
5421 FISCHER	48213
19340 PACKARD	48234
19440 CLIFF	48234
19154 SHERWOOD	48234
19230 CARRIE	48234
19383 SUNSET	48234
18456 SUNSET	48234
19230 MITCHELL	48234
17152 ARLINGTON	48212
17248 ARLINGTON	48212
18860 ST AUBIN	48234
19387 FLEMING	48234
17167 LUMPKIN	48212
19624 GREELEY	48203
20453 ANDOVER	48203

Street Address	Zip Code
20418 ANDOVER	48203
20150 HANNA	48203
18086 RIOPELLE	48203
7644 PIEDMONT	48228
8238 PIEDMONT	48228
11342 MINOCK	48228
13981 RUTHERFORD	48227
15756 ROBSON	48227
15446 MARLOWE	48227
9616 WHITCOMB	48227
15475 ARDMORE	48227
15777 ARDMORE	48227
8611 MARK TWAIN	48228
15087 CRUSE	48227
14878 WARD	48227
14884 WARD	48227
11641 WARD	48227
14927 APPOLINE	48227
15055 MONTE VISTA	48238
15032 PINEHURST	48238
15823 MANOR	48221
14274 ILENE	48238
12771 MANOR	48238
13151 MANOR	48238
14810 INDIANA	48238
15476 INDIANA	48238
15501 OHIO	48238
15717 WOODINGHAM	48238
16665 SAN JUAN	48221
16611 LILAC	48221
16184 STOEPEL	48221
14907 TULLER	48238
16036 LIBERAL	48205
2928 KENDALL	48238
15893 PARKSIDE	48221

Street Address	Zip Code
9354 TERRY	48227
5922 HOLCOMB	48213
4680 BUCKINGHAM	48224
5177 BEWICK	48213
11336 PIEDMONT	48228
14606 KENTUCKY	48238
15268 LAPPIN	48205
10814 NOTTINGHAM	48224
11369 NOTTINGHAM	48224
16077 LIBERAL	48205
16244 LIBERAL	48205
16245 LIBERAL	48205
16237 LIBERAL	48205
16298 ROSSINI DRIVE	48205
16229 LIBERAL	48205
4700 SOMERSET	48224
3985 SOMERSET	48224
14432 WILSHIRE	48213
15835 NOVARA	48205
15661 LIBERAL	48205
15714 LIBERAL	48205
14481 HAZELRIDGE	48205
14319 ROSEMARY	48213
13121 LONGVIEW	48213
14250 HOUSTON-WHITTIER	48205
14221 JANE	48205
14564 MADDELEIN	48205
18438 PELKEY	48205
19539 PELKEY	48205
20219 PELKEY	48205
19598 GOULBURN	48205
12020 ROSEMARY	48213
12039 PROMENADE	48213
10991 LONGVIEW	48213
11822 ROSEMARY	48213

Street Address	Zip Code
19703 ROWE	48205
19335 HOOVER	48205
11346 GREINER	48234
6048 HOLCOMB	48213
8222 KNOELL	48213
18668 ST LOUIS	48234
19180 HARNED	48234
19315 MITCHELL	48234
18162 MITCHELL	48234
17140 LUMPKIN	48212
20021 LUMPKIN	48234
19266 GREELEY	48203
20545 HAMBURG	48205
17359 HAMBURG	48205
4109 CLEMENTS	48238
3821 PASADENA	48238
3013 LESLIE	48238
5548 FARMBROOK	48224
5985 WOODHALL	48224
19410 CORDELL	48205
15276 TACOMA	48205
5024 WAYBURN	48224
5963 WAYBURN	48224
16111 EDMORE DR	48205
14882 TROESTER	48205
5804 DICKERSON	48213
14215 HAMPSHIRE	48213
13421 HAMPSHIRE	48213
14268 CORBETT	48213
14736 WILFRED	48213
12299 CHELSEA	48213
12265 WILSHIRE	48213
19313 HAMBURG	48205
20520 JOANN	48205
19779 WALTHAM	48205

Street Address	Zip Code
20202 WALTHAM	48205
20244 HAMBURG	48205
20252 HAMBURG	48205
11936 HAMBURG	48205
19201 WESTPHALIA	48205
12202 KILBOURNE	48213
10960 WILSHIRE	48213
12208 WILFRED	48213
5278 HARDING	48213
5565 FAIRVIEW	48213
5571 FAIRVIEW	48213
5532 FIELD	48213
2477 WAVERLY	48238
20287 SYRACUSE	48234
19639 SYRACUSE	48234
18084 JUSTINE	48234
19703 KEATING	48203
9301 VAUGHAN	48228
7727 PLAINVIEW	48228
9253 AUBURN	48228
14225 WINTHROP	48227
14859 MARLOWE	48227
15756 STRATHMOOR	48227
11422 HARTWELL	48227
15110 FREELAND	48227
15374 HUBBELL	48227
14961 STRATHMOOR	48227
14616 STRATHMOOR	48227
15796 HARTWELL	48227
18624 HAMBURG	48205
8271 DESOTO	48238
14271 ROSEMARY	48213
9343 FIELDING	48228
9408 CHEYENNE	48227
14509 SNOWDEN	48227

Street Address	Zip Code
4733 LAKEPOINTE	48224
11843 PROMENADE	48213
11380 ROXBURY	48224
12061 LAING	48224
11191 BALFOUR	48224
17207 MUNICH	48224
5224 HEREFORD	48224
5234 HEREFORD	48224
5203 DEVONSHIRE	48224
5759 BUCKINGHAM	48224
3900 SOMERSET	48224
4835 BERKSHIRE	48224
11130 WAYBURN	48224
11327 WHITEHILL	48224
9320 BEDFORD	48224
11766 PAYTON	48224
10320 ROXBURY	48224
5258 ALTER	48224
5203 BEACONSFIELD	48224
5916 LAKEPOINTE	48224
14906 CHELSEA	48213
5766 LAKEVIEW	48213
13045 WADE	48213
13428 WILSHIRE	48213
13354 WILSHIRE	48213
13000 PROMENADE	48213
14825 WILFRED	48213
14288 KILBOURNE	48213
14302 PROMENADE	48213
13300 WILSHIRE	48213
14260 WILSHIRE	48213
13114 GLENFIELD	48213
13130 KILBOURNE	48213
13116 KILBOURNE	48213
13120 GLENFIELD	48213

Street Address	Zip Code
12388 CAMDEN	48213
12235 WILSHIRE	48213
12524 MAIDEN	48213
12782 CORBETT	48213
12630 LONGVIEW	48213
12580 MAIDEN	48213
12713 CORBETT	48213
12511 ROSEMARY	48213
19385 BARLOW	48205
20561 ALCOY	48205
18097 ALCOY	48205
18983 ALCOY	48205
19546 ALCOY	48205
12026 KILBOURNE	48213
11083 WILSHIRE	48213
5082 BEWICK	48213
8405 MAXWELL	48213
5103 MAXWELL	48213
7149 VARJO	48212
19210 CONLEY	48234
15785 PINEHURST	48238
15208 BRINGARD DR	48205
14788 ROSSINI DRIVE	48205
11529 NASHVILLE	48205
13537 SANTA ROSA	48238
19492 BILTMORE	48235
5740 BEDFORD	48224
13245 MANNING	48205
20110 STOTTER	48234
16301 LIBERAL	48205
16277 LAPPIN	48205
15226 FAIRCREST	48205
15451 FAIRCREST	48205
15226 FORDHAM	48205
15886 NOVARA	48205

Street Address	Zip Code
15652 LIBERAL	48205
15706 NOVARA	48205
15864 EASTBURN	48205
15024 TROESTER	48205
15066 MAYFIELD	48205
15053 MAYFIELD	48205
14117 MANNING	48205
14111 MANNING	48205
13895 SARATOGA	48205
13833 FORDHAM	48205
13991 PARK GROVE	48205
13646 SARATOGA	48205
14418 LAPPIN	48205
14966 MADDELEIN	48205
20258 JOANN	48205
20300 JOANN	48205
20105 WESTPHALIA	48205
12410 HAMBURG	48205
19140 GOULBURN	48205
18480 WALTHAM	48205
18652 WALTHAM	48205
19576 JOANN	48205
19129 FAIRPORT	48205
19600 WESTPHALIA	48205
19510 WALTHAM	48205
11851 COLLEGE	48205
12031 ST PATRICK	48205
12001 CHRISTY	48205
11835 CHRISTY	48205
11770 MINDEN	48205
17184 DRESDEN	48205
11861 COLLEGE	48205
19387 BELAND	48234
11226 MINDEN	48205
11114 ENGLSIDE	48205

Street Address	Zip Code
11227 MINDEN	48205
8035 QUINN	48234
7434 QUINN	48234
19317 GABLE	48234
20551 BUFFALO	48234
19157 MOENART	48234
18861 HASSE	48234
19450 EUREKA	48234
19343 HARNED	48234
19975 ST AUBIN	48234
19144 RIOPELLE	48203
18539 HULL	48203
18157 CARDONI	48203
19933 HULL	48203
18879 GREELEY	48203
18148 HULL	48203
268 W MONTANA	48203
5202 MARLBOROUGH	48224
4874 COURVILLE	48224
5211 NOTTINGHAM	48224
20039 BLOOM	48234
15261 MAPLERIDGE	48205
14494 CHELSEA	48213
15303 LIBERAL	48205
15905 LAPPIN	48205
13412 WADE	48213
13106 HAMPSHIRE	48213
13370 WILSHIRE	48213
13859 LINNHURST	48205
14932 LIBERAL	48205
18039 HICKORY	48205
12559 FAIRPORT	48205
11240 PROMENADE	48213
12310 JANE	48205
9204 ERWIN	48213

Street Address	Zip Code
8291 E BRENTWOOD	48234
18859 HELEN	48234
19131 FENELON	48234
18082 CONLEY	48234
18031 ALBANY ST	48234
3614 STOCKTON	48234
19350 KEATING	48203
20111 ANDOVER	48203
15771 PIERSON	48223
15379 PATTON	48223
9036 STOUT	48228
8310 VAUGHAN	48228
11640 FORRER	48227
12866 LAUDER	48227
14375 COYLE	48227
16170 STRATHMOOR	48235
16176 STRATHMOOR	48235
15010 WARD	48227
15779 MENDOTA	48238
20235 OAKFIELD	48235
11707 NOTTINGHAM	48224
11078 WAYBURN	48224
9717 EVERTS	48224
18836 MORANG	48205
9906 HAYES	48213
10631 BONITA	48224
15841 CORAM	48205
15822 WILDEMERE	48221
14694 CEDARGROVE	48205
5051 CHALMERS	48213
14245 CAMDEN	48213
14517 WILFRED	48213
14229 WILSHIRE	48213
13400 CORBETT	48213
14227 EASTWOOD	48205

Street Address	Zip Code
12730 WADE	48213
12624 WADE	48213
20552 WALTHAM	48205
19393 PELKEY	48205
11758 CHRISTY	48205
11208 CHARLEMAGNE	48213
19380 ANNOTT	48205
5025 PENNSYLVANIA	48213
8181 BLISS	48234
9136 ISHAM	48213
11201 COLLEGE	48205
17811 DWYER	48234
19222 ST LOUIS	48234
19333 MOENART	48234
20203 MOENART	48234
18855 JUSTINE	48234
19270 BINDER	48234
17809 CHAREST	48234
977 E BRENTWOOD	48203
1523 E NEVADA	48203
222 W HOLLYWOOD	48203
11360 GRANDMONT	48227
9367 ROBSON	48227
14243 CRUSE	48227
15753 HARTWELL	48227
15781 STEEL	48227
15860 HARTWELL	48235
15050 PINEHURST	48238
15010 MANOR	48238
15788 PINEHURST	48238
15802 MANOR	48221
14607 ROSELAWN	48238
15777 OHIO	48238
20012 SANTA BARBARA	48221
6144 PROCTOR	48210

Street Address	Zip Code
18687 ALBION	48234
19163 MITCHELL	48234
15524 WINTHROP	48227
18291 RUTHERFORD	48235
18299 RUTHERFORD	48235
19418 ST MARYS	48235
4390 NOTTINGHAM	48224
15295 CEDARGROVE	48205
16211 ROSSINI DRIVE	48205
19941 JOANN	48205
19988 JOANN	48205
19555 WESTPHALIA	48205
11800 KILBOURNE	48213
11825 MINDEN	48205
11519 KENMOOR	48205
19215 CARRIE	48234
19400 KEYSTONE	48234
19408 KEYSTONE	48234
19690 BUFFALO	48234
8890 TRINITY	48228
7373 ARTESIAN	48228
6735 ARTESIAN	48228
10016 RUTLAND	48227
7340 RUTHERFORD	48228
13527 RUTHERFORD	48227
15356 ROBSON	48227
9558 ROBSON	48227
15775 STEEL	48227
16144 SNOWDEN	48235
20001 SANTA ROSA	48221
19134 SUSSEX	48235
11264 KENMOOR	48205
13955 RUTHERFORD	48227
18040 INDIANA	48221
19661 HULL	48203

Street Address	Zip Code
16559 FERGUSON	48235
20145 TERRELL	48234
9955 COYLE	48227
20038 MANOR	48221
16622 E STATE FAIR	48205
14078 CARLISLE	48205
20138 STOTTER	48234
6403 STAHELIN	48228
16519 SORRENTO	48235
12436 RIAD	48224
11392 NOTTINGHAM	48224
11176 ROXBURY	48224
19975 REVERE	48234
9262 PLAINVIEW	48228
16164 WARD	48235
15714 STRATHMOOR	48227
18477 ARDMORE	48235
15512 MENDOTA	48238
4061 GRAND	48238
16426 LIBERAL	48205
19325 GABLE	48234
19347 MOENART	48234
19311 KEYSTONE	48234
19344 HARNED	48234
12115 RUTHERFORD	48227
15426 ROBSON	48227
10004 WHITCOMB	48227
14622 HUBBELL	48227
15417 SNOWDEN	48227
19940 BIRWOOD	48221
15833 NORTHLAWN	48221
16833 SANTA ROSA	48221
16315 CORAM	48205
6044 WARWICK	48228
14331 ARDMORE	48227