

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

CITY OF DETROIT,
a Michigan Municipal Corporation

COMPLAINT

Plaintiff,

Hon. Timothy M. Kenny
Case No. _____ CZ

v.

MICHAEL KELLY,
an individual,

Defendant.

City of Detroit Law Department
Charles N. Raimi (P29746)
James D. Nosedo (P52563)
Hallam Stanton (P82319)
Laura Sheehan (P83327)
Attorneys for Plaintiff
2 Woodward Avenue, Suite 500
Detroit, Michigan 48226
(313) 237-5082
stantonh@detroitmi.gov

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.

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 Michael Kelly is a resident of Grosse Pointe Woods, Michigan. He is a licensed real estate broker.

6. Defendant Kelly owns, operates or controls DETROIT PROPERTY EXCHANGE COMPANY, a Michigan Corporation, SUENA HOMES REALTY LLC, a Michigan Limited Liability Company, HOMES OF DETROIT LLC, a Michigan Limited Liability Company, GREATER DETROIT, LLC, a Michigan Limited Liability Company, AMERICAN TAX REFUND LLC, a Michigan Limited Liability Company, MONTLIEU LC, a Michigan Limited Liability Company,

DETROIT LEASING, INC., a Michigan Corporation, SUNRISE HOMES REALTY LLC, a Michigan Limited Liability Company, HOMES OF DETROIT LLC, a Michigan Limited Liability Company, CLEAR SKY REALTY LLC, a Michigan Limited Liability Company, DOBEL PRIZE LLC, a Michigan Limited Liability Company, MIDTOWN HOMES REALTY LLC, a Michigan Limited Liability Company, BELMONT PROPERTIES OF MICHIGAN INC., a Michigan Corporation, WOODLAWN PROPERTIES INC., a Michigan Corporation, DETROIT, MI LLC, a Michigan Limited Liability Company, PARTY CITY LC, a Michigan Limited Liability Company, DAKOTA KIDS GROUP, a Michigan Non-Profit Corporation, ACRE ESTATE LLC, a Michigan Limited Liability Company, 13540 MANSFIELD, LLC, a Michigan Limited Liability Company, CHEROKEE LAND LC, a Michigan Limited Liability Company, 9527 WHITCOMB LLC, a Michigan Limited Liability Company, CHASE LOAN SERVICES, INC., a Michigan Limited Liability Company, BEBA'S BUILDINGS, LLC, a Michigan Limited Liability Company, CHASE DETROIT LLC, a Michigan Limited Liability Company, GOOD HOMES REALTY LLC, a Michigan Limited Liability Company, LATINO HOUSING LLC, a Michigan Limited Liability Company, 15880

ASBURY PARK LLC, a Michigan Limited Liability Company, 18294 AVON LLC, a Michigan Limited Liability Company, 18610 FIVE POINTS LLC, a Michigan Limited Liability Company, 19463 HUNTINGTON LLC, a Michigan Limited Liability Company, 7711 MINOCK LLC, a Michigan Limited Liability Company, ALMA ALMONT LLC, a Michigan Limited Liability Company, AMERICAN EQUITY PARTNERSHIP LLC, a Michigan Limited Liability Company, THE ANGEL GROUP LLC, a Michigan Limited Liability Company, ANGEL HOUSE, A Michigan Non-Profit Corporation, BELMONT PROPERTIES OF DETROIT MICHIGAN INC., a Domestic Profit Corporation, BOIS HOMES LLC, a Michigan Limited Liability Company, DETROIT LAND DEVELOPMENT COMPANY, a Domestic Profit Corporation, DETROIT, MI LLC, a Michigan Limited Liability Company, DETROIT YOUTH GARDENS, A Michigan Non-Profit Corporation, DEVONSHIRE HILLS LC, a Michigan Limited Liability Company, DREAM REALTY COMPANY, a Michigan Profit Corporation, FLORIDA SOUTHERN LC, a Michigan Limited Liability Company, FORD YOUTH GARDEN, A Michigan Non-Profit Corporation, FRENCHY SIROIS LLC, a Michigan Limited Liability Company, GERARD BROTHERS LLC, a Michigan Limited Liability

Company, GRATIOT 100 LC, a Michigan Limited Liability Company, HOMES REALTY LLC, a Michigan Limited Liability Company, JACKSON LAND HOLDINGS, LLC, a Michigan Limited Liability Company, LA CASA GRANDE COMPANY, a Michigan Profit Corporation, LA CASA REAL LC, a Michigan Limited Liability Company, LA CASA REALTY COMPANY, a Michigan Profit Corporation, and REAL TC L.L.C., a Michigan Limited Liability Company.

7. Defendant possesses or controls more than 500 properties in the City of Detroit. He regularly conducts business in the City buying, selling, and leasing real property.

8. This Court has personal jurisdiction over Defendant under MCL 600.701 and MCL 600.705.

9. 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.

10. This Court is the proper venue under MCL 600.1621. Defendant conducts business in Wayne County, and Wayne County is the county in which the injury occurred and where his properties are located.

FACTS

11. Over many years, Defendant has acquired a large number of real properties in the City of Detroit. In the process, he has established a series of business entities and transferred ownership of the properties to these companies. Through these entities, Defendant possesses or controls 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.

12. Defendant is in the realty business, and he possesses or controls these properties in pursuit of this trade. He rents some of his properties to generate short-term returns. He holds others vacant. Defendant has been in this business for many years. He is an experienced realtor.

13. Because properties maintained in an unsafe and unsanitary condition affect the public's health and safety, numerous laws regulate Defendant's 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.

14. The Detroit City Code also regulates Defendant’s 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.

15. These housing laws are not new; they have existed for many years. Defendant, an investor with significant experience in the real-estate industry, knows full well that these laws exist. Indeed, Defendant has been cited numerous times by the City for breaking these laws.

16. Nevertheless, Defendant operates his business in violation of these laws. This is because Defendant pursues an invest-and-neglect business strategy.

Defendant is simultaneously a slumlord and a speculator—a large scale real-property owner who, for the sake of profiteering, uses his properties without regard for the laws governing his business. As a result, many of the properties he possesses or controls are maintained in an unsafe and unsanitary condition, wracked with maintenance issues that harm Detroit's residents.

17. At some of Defendant's properties, the list of property maintenance code violations is long. His 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. This list is not exhaustive, and Defendant's properties continue to deteriorate due to a lack of maintenance and repair.

18. 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, Defendant knowingly possesses or controls occupied rental properties without adhering to these requirements.

19. 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, Defendant knowingly possesses or controls vacant properties in violation of these requirements.

20. Rather than comply with the law, Defendant attempts to circumvent it. His business practices include persuading unsophisticated individuals to execute documents which are in substance landlord-tenant leases, but which Defendant characterizes—when convenient for him—as land contracts. Defendant does this to avoid his legal obligations as a landlord while retaining control over his properties. When an individual fails to make a payment mandated by the lease, Defendant evicts them as tenants and starts the process over.

21. Defendant's invest-and-neglect business threatens the public's health and safety. Most damning, perhaps, is Defendant's 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. Defendant's invest-and-neglect business also causes increased blight and crime in Detroit's neighborhoods. Once Defendant's properties deteriorate to such an extent that they no longer serve a useful purpose, he abandons 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, Defendant's behavior negatively affects the quality of life for all Detroiters, not just his 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 Defendant, 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 his activities, the City has fined Defendant on countless occasions. Since 2001, the City has issued approximately 1,500 property maintenance violation notices relating to Defendant's properties. In the last months of 2019 alone, these fines have amounted to thousands of dollars. Defendant is fully aware of these significant maintenance issues. But individual violation notices have done nothing to change his behavior. Of the hundreds of properties owned by Defendant, the City believes that the vast majority are not now and never have been in compliance with applicable housing laws. In some instances, Defendant's properties have been so dilapidated that they have been declared dangerous and demolished. Individual violation notices have proven inadequate to secure Defendant's compliance with the law.

25. The City and its residents are harmed by Defendant's invest-and-neglect business. By failing to comply with lead-safe rental laws, Defendant is 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, Defendant's 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. Defendant's conduct is unreasonable—it is not up to him whether or not to comply with the laws that regulate his business. By choosing to disregard these laws in pursuit of greater profits, he is significantly interfering with the public's health, safety, peace, comfort, and convenience. At a minimum, Defendant knows, or should know, that he is producing a long-lasting significant effect on these rights. Defendant is not engaged in capitalism; his 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. Defendant possesses or controls 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. Defendant is aware of the condition of these properties. These properties are a public nuisance.

31. Defendant is a slumlord and a speculator—he follows an invest-and-neglect business model to profiteer. He possesses or controls hundreds of properties and fails to maintain these properties in accordance with the laws governing his business—including lead abatement laws. This presents a threat to the public's health, safety, and welfare. Defendant knowingly pursues this invest-and-neglect business strategy. Defendant's 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 Defendant immediately brings his properties into compliance with all applicable laws—and that he be enjoined from engaging in further property speculation until all properties he possesses or controls comply with the law.

RELIEF REQUESTED

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

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

35. An order that Defendant maintains 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 Defendant maintains all vacant properties possessed or controlled in accordance with all applicable laws.

37. An order prohibiting Defendant from directly or indirectly buying, selling, managing, or renting additional properties in Detroit until he adheres to the above orders.

38. An order holding Defendant in contempt if he fails 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 Defendant's expense to carry out the above orders, if Defendant fails 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

Charles N. Raimi (P29746)

James D. Nosedo (P52563)

Hallam Stanton (P82319)

Laura Sheehan (P83327)

Attorneys for Plaintiff

2 Woodward Avenue, Suite 500

Detroit, Michigan 48226

(313) 237-5082

stantonh@detroitmi.gov

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.

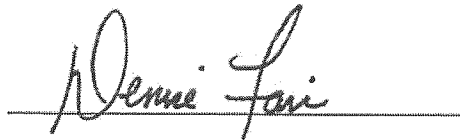
¹² State v. McQueen, 293 Mich. App. 644, 674 (2011).

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
13118 Dexter	48238
13243 LIVERNOIS	48238
1327 Ashland	48215
14041 ROSEMONT	48223
1444 EDISON	48206
1524 GLYNN.	48206
15319 SUSSEX	48227
15717 Griggs	48238
15803 FERGUSON	48227
15816 Linnhurst	48205
1678-80 Glynn Ct	48206
17465 SALEM	48219
19549 W MCNICHOLS	48219
2011 LONGFELLOW	48206
225 Ashland	48215
312 Kenilworth	48202
6128 ROSA PARKS BLVD	48208
6181 AVERY	48208
620 Leicester Ct	48202
6126 HECLA	48208
12520 E SEVEN MILE	48205
3853 PURITAN	48238
5902 Linwood	48208
1444 FERRY PARK	48208
14499 LAMPHERE	48223
1456 Ferry Park	48208
6198 HECLA	48208
20427 Ohio	48221
20484 CONNER	48234
556 E Euclid	48202
10132 W Grand River	48204
8282 Meyers	48228
10006 WARD	48227
10013 WHITCOMB	48227
10030 HUBBELL	48227

Street Address	Zip Code
10046 STRATHMOOR	48227
11361 NOTTINGHAM.	48224
12047 MARLOWE	48227
12611 ABINGTON AVE	48227
12758 SANTA ROSA	48238
12810 APPLETON	48223
12812 MEMORIAL	48227
12857 MEMORIAL	48227
12907 MANSFIELD	48227
13103 PEMBROKE	48235
13558 LONGACRE	48227
13827 E STATE FAIR	48205
13883 EASTBURN	48205
13934 LAUDER	48227
13934 PIEDMONT	48223
14007 Robson	48227
14150 Artesian	48223
14154 RUTHERFORD	48227
14166 MANSFIELD	48227
14177 E STATE FAIR	48205
14376 WARWICK	48223
14377 GREENVIEW	48223
14425 WOODMONT	48227
14432 Piedmont.	48223
14636 WOODMONT	48227
14740 RUTLAND	48227
14829 RUTHERFORD	48227
14855 WINTHROP	48227
14909 MARK TWAIN	48227
14914 LAUDER	48227
14921 BILTMORE	48227
14929 LINDSAY	48227
14935 ARCHDALE	48227
14969 LINDSAY	48227
15015 Stahelin	48223

Street Address	Zip Code
1509 GLYNN CT	48206
15361 PIEDMONT	48223
15697 SARATOGA	48205
15740 LINNHURST	48205
15750 Vaughan	48223
15814 PLAINVIEW.	48223
15860 St. Marys	48227
15875 WHITCOMB	48227
15940 HACKETT	48227
16160 FERGUSON	48235
16195 CHEYENNE.	48235
16227 Marlowe	48235
16444 Liberal	48205
16505 LITTLEFIELD	48235
16515 Westbrook	48219
16527 Ardmore	48235
16827 ASBURY PARK.	48235
16832 Braile	48219
16839 MURRAY HILL	48235
16881 MURRAY HILL	48235
16885 SORRENTO	48235
16919 Littlefield	48235
17164 RUTHERFORD	48235
17174 PENNINGTON	48221
17188 RUNYON	48234
17329 Northlawn	48221
17383 TEPPERT	48234
17401 Patton St.	48219
17534 SUNDERLAND RD	48219
17559 Roselawn	48221
17690 COOLEY	48219
18203 NORTHROP	48219
18213 Lenore	48219
18260 SNOWDEN	48235
18262 STAHELIN	48219

Street Address	Zip Code
18287 STAHELIN	48219
18308 Sorrento	48235
18312 FENMORE	48235
18314 CODDING	48219
18320 STAHELIN	48219
18419 Sunderland	48219
18425 COYLE	48235
18502 WOODINGHAM	48221
18600 HAMBURG	48205
18601 Oakfield	48235
18631 Hartwell	48235
18639 SAN JUAN	48221
18650 LANCASHIRE	48223
18675 OHIO	48221
18685 BLOOM	48234
18689 Glastonbury	48219
18715 Rutherford	48235
18721 AVON	48219
18750 AVON	48219
19128 WESTMORELAND	48219
19134 Cliff	48234
19161 Tracey St.	48235
19230 CURTIS	48219
19319 ANNCHESTER	48219
19321 HAMBURG	48205
19326 HOOVER	48205
19334 APPOLINE	48235
19340 CONCORD	48234
19341 Marlowe	48235
19350 SCHAEFER HWY	48235
19364 EVERGREEN RD	48219
19409 SCHOENHERR	48205
19436 LAHSER	48219
19495 Livernois	48221
19653 Shields	48234

Street Address	Zip Code
19900 Grandview.	48219
19920 BENTLER	48219
19934 Marx	48203
19940 BURGESS.	48219
19949 Rogge	48234
19990 MARX	48203
20067 CHAPEL	48219
20099 GREYDALE	48219
2019 EDISON	48206
20200 STOUT	48219
20203 BILTMORE	48235
20275 PREVOST	48235
20400 ORLEANS	48203
20431 GODDARD	48234
20441 CHEROKEE	48219
20454 Spencer	48234
20481 LAUDER	48235
20539 Picadilly	48221
22068 CURTIS	48219
22510 LYNDON	48223
22514 RAY	48223
2309 S La Salle Gardens	48206
23519 MARGARETA	48219
2411 Stair St.	48209
2535 CHICAGO	48206
2550 Puritan	48238
2647 OAKMAN CT	48238
2705 OAKMAN CT	48238
2925 OAKMAN CT	48238
4014 THREE MILE DR	48224
4161 E OUTER DRIVE	48234
4260 STURTEVANT	48238
5090 Berkshire	48224
539 KING	48202
6710 Edgeton	48212

Street Address	Zip Code
6829 Edgeton	48212
7647 Warwick	48228
7706 E Seven Mile	48234
7706 W SEVEN MILE	48221
7808 HEYDEN.	48228
7811 Penrod	48228
8050 MIDDLEPOINT	48204
8301 SORRENTO	48228
8322 SCHAEFER	48221
8565 PINEHURST	48204
8858 WARWICK	48228
8900 Birwood	48204
8930 APPOLINE	48228
8984 DAWES	48204
9025 La Salle BLVD	48206
9045 Annapolis	48204
9074 Braile	48228
9125 MANOR	48204
9209 ARTESIAN	48228
9311 MENDOTA	48204
9312 ROSEMONT	48228
9413 MANOR	48204
9534 PATTON	48228
9545 Prest	48227
9567 LAUDER	48227
9623 Ward	48227
9627 ROBSON	48227
9646 MARLOWE	48227
19489 Livernois	48221
10023 Littlefield	48227
10344-46 WEST POINT	48204
11310 WESTWOOD	48228
12083 GLASTONBURY	48228
12875 DALE	48223
13540 MANSFIELD	48227

Street Address	Zip Code
13610 GRANDMONT	48227
13616 ARCHDALE	48227
13987 PREVOST	48227
14201 Greenview	48223
14206 PREVOST	48227
14430 GLASTONBURY	48223
14836 BEAVERLAND	48223
14891 GRANDMONT	48227
14910 STAHELIN RD	48223
14922 WESTWOOD	48223
14967 Ardmore	48227
15300 Fordham	48205
15478 WISCONSIN	48238
15500 MAPLERIDGE	48205
15506 Seymour	48205
15619 Eastwood	48205
15660 Eastwood	48205
15705 MINOCK	48223
15719 KENTUCKY	48238
15753 WASHBURN	48238
15829 ARCHDALE	48235
15845 Fordham	48205
15845 ROBSON	48227
15880 BILTMORE	48227
16145 Prevost	48227
16202 W SEVEN MILE	48235
16261 SORRENTO	48235
16476 Bringard	48205
16527 Prest	48235
16550 Lauder	48235
16565 STRATHMOOR	48235
16590 Stahelin	48219
16624 Burt Rd	48219
16700 Ferguson	48235
16784 BLACKSTONE	48219

Street Address	Zip Code
16850 Ardmore	48235
17127 ASHTON.	48219
17190 RUTHERFORD	48235
17343 MIDLAND	48227
17672 TEPPERT	48234
1775 E OUTER DRIVE	48234
18000 St Marys	48235
18046 ALGONAC	48234
18067 KENTUCKY	48221
18183 Dequindre	48203
18215 Beaverland	48219
18294 Avon	48219
18318 SUNDERLAND RD	48219
18410 Winthrop	48235
18411 FAUST.	48219
18440 Algonac	48234
18488 Sussex	48235
18514 PREST	48235
18577 Joseph Campau	48234
18610 Five Points	48240
18620 FERGUSON	48235
18665 SALEM	48219
18669 Greenview	48219
18717 WARWICK	48219
18776 Faust	48219
18783 FAUST	48219
19003 CURTIS	48219
19021 SHIAWASSEE.	48219
19136 Joy Rd	48228
19141 HICKORY	48205
1915 GLYNN CT	48206
19446 EDINBOROUGH.	48219
19463 HUNTINGTON	48219
19520 James Couzens	48235
19672 Dean	48234

Street Address	Zip Code
19672 Yonka	48234
19690 CARRIE	48234
19710 EDINBOROUGH	48219
19776 HOOVER	48205
19784 EDINBOROUGH	48219
1991 Lawrence	48206
19944 Gallagher	48234
19961 WESTBROOK	48219
20033 SNOWDEN	48235
20036 Rogge	48234
20052 Kingsville	48236
20087 Dean	48234
20127 Littlefield	48235
20230 RIOPELLE	48203
20255 Riopelle	48203
20435 Packard	48234
20444 AUDREY	48235
20531 GILCHRIST	48235
2235 Glynn Ct	48206
22424 ACACIA ST.	48223
23623 W MCNICHOLS	48219
2424 GLYNN CT.	48206
2436 W GRAND BLVD	48208
24485 Frisbee	48219
2464 Glynn Ct	48206
2480 GLADSTONE	48206
2901 Oakman Ct.	48238
3001 Puritan	48227
3469 Three Mile Dr	48224
3735 LESLIE	48238
3982 THREE MILE DR	48224
4417 COURVILLE	48224
4651 THREE MILE DR.	48224
4908 Cortland	48204
5827 Loraine	48208

Street Address	Zip Code
6363 Penrod	48228
6442 Penrod	48228
6889 Stahelin	48228
7430 Brentwood	48234
7697 STOUT	48228
7711 Minock	48228
8097 Indiana	48204
8236 KENTUCKY	48204
8236 NORTHLAWN	48204
8248 Coyle	48228
8534 Indiana	48204
8859 DAWES	48204
8877 WESTWOOD	48228
8957 GRIGGS	48204
9027 PIEDMONT	48228
9046 STAHELIN	48228
9100 Beverly Ct	48204
9115 Hartwell	48228
9227 APPOLINE	48228
9252 ROSEMONT	48228
9262 WESTWOOD	48228
9325 Mendota	48204
9351 Birwood	48204
9606 PREST	48227
9608 HEYDEN	48228
12945 Forrer	48227
12954 METTETAL	48227
13906 ARCHDALE	48227
14830 Prevost	48227
15062 Mettetal	48227
17635 CHESTER	48224
18660 Lindsay	48235
18814 CURTIS	48219
19391 SUNSET	48234
19401 GRANDVILLE	48219

Street Address	Zip Code
8115 Strathmoor.	48228
9225 PENROD	48228
9525 GOODWIN	48211
10009 Strathmoor	48227
11390 TERRY	48227
11400 EVERGREEN	48228
11700 HUBBELL	48227
12012 Whitcomb	48227
12038 LAUDER	48227
12069 SUSSEX	48227
12100 Duchess	48224
12850 St Marys	48227
14000 ROBSON	48227
14509 ROSSINI DRIVE	48205
14514 Grandville	48223
14538 Grandville	48223
14575 PREVOST	48227
15257 Eastwood	48205
15338 SUSSEX	48227
15375 SUSSEX	48227
15416 CARLISLE	48205
15422 Mapleridge	48205
15440 Archdale Ave	48227
15462 BILTMORE	48227
15627 CORAM	48205
15720 Biltmore	48227
16076 CORAM	48205
17126 WARD	48235
17346 DRESDEN	48205
18215 WOODBINE	48219
18498 St Marys	48235
18508 SCHAEFER	48235
18611 TEPPERT	48234
18619 Steel	48235
18692 GILCHRIST	48235

Street Address	Zip Code
18928 Teppert	48234
19004 Margareta	48219
19165 Danbury	48203
19321 GREENFIELD	48235
19376 Spencer	48234
19498 SUNDERLAND RD	48219
19507 PIERSON	48219
19626 Helen	48234
19659 Rogge	48234
19705 Dean	48234
19718 WHITCOMB	48235
19925 PREVOST	48235
19951 ASBURY PARK	48235
19969 CUSHING	48205
20091 AVON	48219
20095 Dean	48234
20210 TERRELL	48234
20257 Ryan	48234
20440 GRANDVIEW	48219
20450 ROSELAWN	48221
20490 Klinger	48234
20517 WARD	48235
20550 Lindsay	48235
21322 PEMBROKE	48219
5024 OAKMAN BLVD	48204
6811 E NEVADA	48234
7443 CLAYBURN	48228
8063 Rolyat	48234
8063 Yolanda	48234
8130 CLOVERLAWN	48204
8317 Sussex	48228
8601 STRATHMOOR	48228
9075 PIEDMONT	48228
9106 Brace	48228
9233 STAHELIN	48228

Street Address	Zip Code
9238 WESTWOOD	48228
9258 Cheyenne	48228
9370 Ward	48228
9412 Steel	48228
9527 WHITCOMB	48227
9559 PATTON	48228
16165 Cruse	48235
9330 Manor	48204
15880 ASBURY PARK	48235
3991 Three Mile Dr	48224
2440 GLYNN CT	48206
15860 Ohio	48238
13986 Coyle	48227
20125 Snowden	48235
20442 Wyoming	48221
8167 House	48234
9368 WYOMING	48204
19682 Carrie	48234
15293 Mapleridge	48205
11801 Linwood	48206
12608 SANTA ROSA	48238
12651 METTETAL	48227
12679 GRANDMONT	48227
14369 Mark Twain	48227
14559 WILDEMERE	48238
14572 BEAVERLAND	48223
14636 Freeland	48227
14834 Cruse	48227
15506 WISCONSIN	48238
15810 VAUGHAN	48223
16511 STRATHMOOR	48235
16565 Kentucky Apt 2	48221
16826 TRACEY	48235
17565 SCHAEFER	48235
18843 LANCASHIRE	48223

Street Address	Zip Code
18937 FERGUSON	48235
19309 WESTMORELAND	48219
19350 BINDER	48234
19767 STRATHMOOR	48235
19805 Rutherford	48235
20090 LAHSER	48219
20135 TIREMAN	48228
2362 SHARON	48209
8070 Wisconsin	48204
8167 MARLOWE	48228
8310 Suzanne	48234
8331 PINEHURST	48204
8835 Coyle	48228
9393 Cloverlawn	48204
9942 MINOCK	48228
1679 LEMAY	48214
14434 Asbury Park	48227
14615 ARCHDALE	48227
14644 Mark Twain	48227
15470 Greenfield lower	48227
16177 Monte Vista	48221
16808 Murray Hill	48235
17570 WISCONSIN	48221
18344 GRAYFIELD	48219
18643 Mansfield	48235
18717 BILTMORE	48235
19001 CONANT ST	48234
19625 GALLAGHER	48234
19937 Chapel	48219
20538 Dean	48234
3936 COURVILLE	48224
502 LEICESTER CT	48202
8227 Coyle St	48228
8246 Hubbell	48228
8945 Wisconsin	48204

Street Address	Zip Code
9574 CHEYENNE	48227
18910 MARGARETA	48219