

**STATE OF MICHIGAN**  
**IN THE WASHTENAW COUNTY TRIAL COURT**

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THE PEOPLE OF THE STATE OF MICHIGAN,

Case No. 21FB-1656

Plaintiff,

HON.

-v-

RYAN CUONG LE-NGUYEN,

Defendant.

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ELI N. SAVIT (P76528)  
Washtenaw County Prosecuting Attorney  
Attorney for Plaintiff  
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LAW OFFICES OF JOSEPH A. SIMON  
Attorney for Defendant  
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**EMERGENCY MOTION TO REVOKE/VACATE BOND**

COMES NOW Eli N. Savit, Washtenaw County Prosecuting Attorney, through Patricia A. Reiser, First Assistant Prosecuting Attorney, and respectfully requests this Court (1) vacate Defendant's bond, (2) issue an immediate warrant for Defendant's arrest, and (3) set a new bond hearing in which both parties may participate, stating as grounds therefore:

1. Defendant is charged with 4 felonies: Assault with Intent to Murder, contrary to MCL 750.83; Assault with Intent to do Great Bodily Harm, contrary to MCL 750.84; Weapons-Firearms-Discharge in or at a Building, contrary to MCL 750.234b(2); and Weapons-Firearms-Discharge in or at a Building Causing Injury, contrary to MCL 750.234b(3).

2. Defendant and the victim both live on Candlewood Lane in Ypsilanti Township. The victim in this case is a 6-year old child. Other young neighborhood children were also involved. The victim suffered a gunshot wound. On information and belief, prior to the shooting, Defendant threatened the victim and other children with a sledgehammer and/or an axe. The police did not seize a hammer or an axe when they searched Defendant's residence. (Note: the search warrant specified firearms.)
3. According to the police report—and the Defendant's own statements to the police—Defendant has repeatedly engaged in confrontations with children in the neighborhood. Those children range in age from 6-16.
4. On information and belief, Defendant's girlfriend went to Defendant's residence with deputies for civil standby. It is not known if an axe or hammer were taken.
5. At arraignment before Magistrate Fink on Monday, June 7, 2021, Defendant was granted a \$10,000 cash or surety bond, along with the following conditions:
  - No contact with the 6-year-old victim;
  - Do not go to Candlewood Lane (where both the victim and Defendant reside), except civil standby;
  - Do not purchase or possess weapons, firearms, or ammunition.
6. Although Magistrate Fink ordered Defendant not to return to Candlewood Lane, the address to which Defendant was to be released was *apparently nonexistent*. The Court Activity Record indicates an address of "15709 Carrie Drive, Ypsilanti, MI 48197." A search of this address yields no results. (*See attached Court Activity Record.*)
7. Despite the magistrate's order to not go to Candlewood Lane, where the 6-year old victim as well as other involved children in the neighborhood reside, there were no

conditions put in place (such as a GPS tether) to ensure compliance. Mr. Le-Nguyen's address of release being listed as the nonexistent "15709 Carrie Drive" exacerbated this inability to enforce compliance. Given the history of confrontation between Mr. Le-Nguyen and neighborhood children, as well as the fact that an axe/other weapon remains in Mr. Le-Nguyen's home, all of this raises serious public safety concerns, as well as flight risk concerns.

8. Defendant's counsel has represented that, in fact, the address of release should have been listed as "5709" (rather than "15709") "Cary Drive" (rather than "Carrie Drive") All of this, however, speaks to a more fundamental issue: specifically, there is no way to ensure compliance with the "No Go To" condition—and, therefore, no way to ensure the safety of the young victim and other young children on Candlewood Lane—without, at a minimum, (1) a GPS tether restricting Defendant's location and movements to a known residence and/or a known residence with restricted surrounding area, and (2) a specific (and existent) address at which he can reside.
9. Given the serious public safety risks involved in this case, in addition to the flight risks, the People also would request, as a necessary layer of protection, that Mr. Le-Nguyen be released only to a responsible member of the community that can ensure the safety of the public. *See* MCR 6.106(d)(2)(j), (o). That Mr. Le-Nguyen was initially released to a nonexistent address (where public safety obviously could not be ensured) highlights the need for this condition.
10. Accordingly, the People request that this Honorable Court, on an emergency basis, vacate Defendant's bond, issue an immediate warrant for Defendant's arrest, and set a bond hearing in which both parties may participate. At that bond hearing, the People

will advocate for, at minimum, (1) Defendant to remain in custody unless and until a responsible member of the community has been identified with whom he will be required to stay, MCR 6.106(D)(2)(j), and (2) if such a person is identified, for Defendant to be outfitted with a GPS tether to ensure that he remains at a valid address and that he does not return to Candlewood Lane.

WHEREFORE, the People request this Honorable Court to revoke/reconsider bond on an emergency basis, and set a hearing for this Thursday morning, June 10, 2021.

Respectfully submitted,

Eli N. Savit (P76528)  
Washtenaw County Prosecuting Attorney  
By: /s/ Patricia A. Reiser  
Patricia A. Reiser (P52153)  
First Assistant Prosecuting Attorney

Dated: June 9, 2021

PROOF OF SERVICE

The undersigned certifies that the foregoing instrument was served upon all parties to the above cause to each of the attorneys of record herein at their respective addresses disclosed on the pleadings on 6/9/21  
By:  U.S. Mail  Hand Delivered  
 Fax  Interoffice  Email  
Signature: /s/ Patricia A. Reiser