



DEPARTMENT OF ENVIRONMENTAL QUALITY
POLICY AND PROCEDURES

SUBJECT: REFERRALS OF MATTERS TO THE ATTORNEY GENERAL OR THE OFFICE OF CRIMINAL INVESTIGATIONS **Number:** 09-002
Date: September 4, 1998 **Page 1 of 10**
Revised: October 24, 2001

ISSUE:

Department of Environmental Quality (DEQ) staff often work closely with attorneys on the Attorney General's staff in situations where the DEQ requires legal advice or representation. In order to make the best use of DEQ staff's time and the time of staff of the Department of Attorney General (DAG), and to establish clear lines of communication and authority, it is necessary to establish procedures and criteria for referring matters to the DAG.

DEFINITIONS:

- "Informal Opinion" means a legal opinion provided to the DEQ by the Assistant Attorneys General assigned to the DEQ's program areas. Informal legal opinions may be requested in writing and usually involve legal interpretations of specific regulations administered by the DEQ.

"Formal Opinion" means a legal opinion provided to the DEQ by the Attorney General. A request for a formal legal opinion is made in writing and undergoes a formal review process by the Attorney General's staff and the Attorney General; the resulting opinion is publicized. A formal legal opinion may be requested when a legal issue has the potential to significantly impact DEQ functions or the general public.

"Civil legal issues" includes any referral that is for entry of a judicial consent decree; any referral that is for the filing of a lawsuit; and any request for representation by the DAG at contested cases.

POLICY:

The DEQ supports mutually beneficial DEQ staff contacts with staff of the DAG. In most cases, this means that DEQ staff contact with members of the DAG staff should be limited to those staff who have been specifically designated by their division/office to contact staff of the DAG. In recognition of this, the DEQ procedure for initiating contact with the Attorney General or the DAG staff is as outlined in the following procedure:

NOTE: Other contacts with the DAG that take place in the normal course of conducting business, and that do NOT involve issues that have significant impact on DEQ or DEQ/division/office policy, are not affected by the procedure.

Examples of issues that are considered normal course of conducting business include, but are not limited to, assistance in negotiating administrative orders; reviewing or signing administrative consent orders as to form or content; advice and assistance in gaining court-ordered access to sites; and advice in collecting and preserving evidence.

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In these instances, DEQ staff contact with members of the DAG staff is to be limited to those staff who have been specifically designated by their division/office to contact staff of the DAG. Division/office's requesting assistance gaining court-ordered access shall request such assistance through a memo from the division/office chief to the Assistant in Charge, Natural Resources and Environmental Quality Division, DAG, with a copy to the Deputy Attorney General of the DAG and the Deputy Director for Programs and Regulations of the DEQ.

PROCEDURE A: Requesting an Informal Opinion

Responsibility

Action

Division/Office Staff

- 1 For issues that could have significant impact on the DEQ or DEQ policy, the staff puts a request for written, informal opinion in writing and forwards the request to the division/office chief via the chain of command.

Division/Office Chief

- 2 Reviews request.
 - A. If approved, forwards the request to the Deputy Director for Programs and Regulations.
 - B. If denied, returns the request to staff with reasons for denial.

Deputy Director for Programs
and Regulations

3. Reviews request.
 - A. If approved, forwards request to the Deputy Attorney General.
 - B. If denied, returns request to division/office chief with reasons for denial.

Division/Office Chief

- 4 Notifies staff of the status of the request.

PROCEDURE B: Requesting a Formal Opinion

Responsibility

Action

Division/Office Staff

- 1 Sends a written request through the chain of command to division/office chief requesting formal opinion. Includes complete information about nature of issue, applicable statutes, and specific question(s) to be answered.

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PROCEDURE B: Requesting a Formal Opinion (continued)

Responsibility

Action

Division/Office Chief

2. Reviews request.
 - A. If approved, forwards request to Deputy Director for Programs and Regulations with cover memo stating that division/office chief recommends that the matter be forwarded to the DAG for a formal opinion, along with a transmittal memorandum to the Attorney General containing specific question(s) to be addressed in the formal opinion for the Director's signature.
 - B. If not approved, returns request to staff through chain of command with explanation.

Deputy Director for Programs and Regulations

3. Reviews request with the Director and the Legal Division of the Governor's Office.
 - A. If approved, forwards request for formal opinion and transmittal memorandum to Director. Go to Step 5.
 - B. If not approved, returns request to division/office chief with explanation.

Division/Office Chief

4. Receives unapproved request in Step 3., B. Performs Step 2., B.

Director

5. If approved, signs memorandum and sends to Attorney General.

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Procedure C: Referral of Civil Legal Issues to the DAG

NOTE: Please see DEQ Policy and Procedure 09-003 regarding Processing and Receipt of Subpoenas and/or Summons and Complaints in cases where the DEQ or its staff are named or are witnesses in a civil action.

Responsibility

Action

Division/Office Staff

- 1 Finds evidence of apparent civil violation of statute administered by the DEQ.
2. Per division/office procedures, determines if violation should be escalated for enforcement action. If yes, refers information to program Compliance and Enforcement (C&E) staff, through the chain of command.

Program C&E Staff

3. Receives information from Step 2. for escalated violations. Per division/office procedures, determines if civil action is appropriate. If yes, refers information to division/office chief with recommendation that civil action is appropriate. Per DEQ Compliance and Enforcement Policy - 04-003, prepares briefing materials to division/office chief and drafts the referral memo for division/office chief to forward for the Director's signature. See Attachments A, B, C, and D for referral templates.

NOTE: Attachments A, B, C, and D are templates. To access these templates in Microsoft Word:

On the New Document Pane on right side of screen, under "New from template," click on General Templates, and then click on General Tab.

- Select appropriate template as follows:

EQ0183 – Referral Memo to Deputy Director
EQ0184 – Referral Letter to Attorney General
EQ0185 – Referral Letter to Attorney General
for contested cases
EQ0186 – Referral Briefing

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Procedure C: Referral of Civil Legal Issues to the DAG (continued)

Responsibility

Action

Division/Office Chief

4. Considers information and recommendation that civil action be taken against alleged violator.
 - A. If, in the judgment of the division/office chief, a referral to the Attorney General is appropriate, makes recommendation to the Deputy Director for Programs and Regulations.
 - B. If not appropriate, in the judgment of the division/office chief, refers the information back to the C&E staff for further review or clarification.

Deputy Director for Programs and Regulations

5. Considers information and recommendation that civil action be taken against alleged violator.
 - A. If, in the judgment of the Deputy Director, a referral to the Attorney General is appropriate, makes recommendation to the Director.
 - B. If not appropriate, in the judgment of the Deputy Director for Programs and Regulations, refers the information back to division/office chief for further review or clarification.

Director

6. Signs and transmits the referral letter to the Attorney General recommending that civil action be taken against alleged violator if, in the judgment of the Director, this course of action is appropriate.

C&E Staff

7. Provides detailed information from the division's file(s) to the DAG staff once referral is sent.

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Procedure D: Requesting Representation by DAG for Filing a Bankruptcy Claim

Responsibility

Action

Division/Office Staff

1. Receives notification that a bankruptcy petition has been filed with the court.
2. Secures copy of the petition, and any file material relevant to determining whether the DEQ should file a claim in the bankruptcy proceeding. Coordinates with district and other divisions and requests informal advice from DAG staff, as necessary, to assist in the determination of whether to file a claim and the basis and amount of the claim.
3. Prepares briefing materials for division/office chief and drafts the request memo for division/office chief to forward to the Assistant in Charge, Natural Resources and Environmental Quality Division, DAG. The memo should state the name and location of the company/site that the DEQ is requesting that the DAG file a claim in bankruptcy court, the filing deadline for the claim, and a summary of the claim(s) to be filed. The notice of the bankruptcy case and filing deadline and all supporting documentation for the DEQ's claim shall be attached to the memo.

Division/Office Chief

4. Reviews materials and, if appropriate, sends to the Assistant in Charge, Natural Resources and Environmental Quality Division, DAG, with copy to the Deputy Attorney General, DAG, and Deputy Director for Programs and Regulations, DEQ.

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Procedure E: Referral of Potential Criminal Issues

Responsibility

Action

Employee

- 1 Obtains evidence of suspected criminal violation of statute administered by the DEQ.

NOTE: All suspected felony criminal issues shall be referred to OCI staff.

Suspected misdemeanor criminal issues shall be referred to the district Office of Criminal Investigations (OCI) staff, in accordance with the division/office's compliance and enforcement policy, after notification of initiating staff's immediate supervisor.

For purposes of this directive, suspected criminal issues shall be defined as those issues where it is suspected that the violations were committed knowingly, intentionally, or through gross negligence. If there is a doubt involving what is a suspected criminal issue, consult with your district's OCI enforcement staff for immediate clarification.

- 2 Shares information with immediate supervisor for purposes of notification. Completes Criminal Complaint Investigation Request (Attachment E) and signs.

NOTE: Attachment E is a template. To access this template in Microsoft Word:

On the New Document Pane, click on General Templates, and then click on OCI Tab.

- Select appropriate template as follows:

**EQ9107p – Criminal Complaint Investigation Request
Attachment E**

3. Secures signature of immediate supervisor and refers to district OCI staff.

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Procedure E: Referral of Potential Criminal Issues (continued)

Responsibility

Action

Immediate Supervisor

4. Consults and advises employee. Signs DEQ Criminal Complaint Investigation Request to acknowledge referral of case.
5. Informs division/office chain of command (unit supervisor, section supervisor, district supervisor, field supervisor, C&E Chief, and division/office chief) by forwarding completed Criminal Complaint Investigation Request.
6. Retains a copy of the Criminal Complaint Investigation Request for tracking.

C&E Chief

7. Receives copy of the Criminal Complaint Investigation Request.
8. Within ten days, reviews referral and determines if there are ongoing or pending civil or administrative actions that may effect the referral.
9. If there are no ongoing or pending civil or administrative actions, files Criminal Complaint Investigation Request and tracks referral.
10. If there are ongoing or pending civil or administrative actions, immediately notifies the OCI Chief and provides the division/office chief with written recommendation of what action, if any, the division/office should take on the civil or administrative action.

Division Chief

11. Reviews the recommendation of the C&E Chief and decides on a course of action for the civil and administrative action.
12. If the action is to pursue joint criminal, civil, or administrative remedies, notifies the Deputy Director for Programs and Regulation for concurrence prior to proceeding.

Deputy Director for Programs and Regulations

13. Consults C&E Chief, division/office chief, and OCI Chief and renders decision.

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Procedure E: Referral of Potential Criminal Issues (continued)

Responsibility

Action

OCI Criminal Investigator

14. Conducts preliminary investigative follow-up in accordance with the OCI priority system. Provides action recommendation to the OCI unit supervisor, utilizing the Criminal Complaint Investigation Request. **Response to referring division/office is required within ten working days after original receipt of Criminal Complaint Investigation Request.**

OCI Unit Supervisor

15. Reviews action recommendation from OCI Criminal Investigator.

16. If, in the judgment of the OCI unit supervisor, a criminal investigation is warranted, issues a project number and a case number to the appropriate OCI criminal investigator and establishes an initial case priority number. Proceed to Step 18.

17. If, in the judgment of the OCI unit supervisor, a criminal investigation is not warranted, refers this decision to original referring OCI criminal investigator with reason for denial. Proceeds to Step 22.

OCI Criminal Investigator

18. Receives project and case number from OCI unit supervisor.

19. Advises referring DEQ staff that an official investigation is initiated, utilizing the original Criminal Complaint Investigation Request.

20. Conducts a criminal investigation in accordance with the OCI priority system.

21. Prepares a report of investigation and submits to the OCI unit supervisor for review with recommendation for prosecution or closure of case. Proceeds to Step 23.

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Procedure E: Referral of Potential Criminal Issues (continued)

Responsibility

Action

OCI Criminal Investigator (continued)

22. Receives denial of investigation from the OCI unit supervisor. Immediately returns the matter to the original referring staff with written reason for denial of investigation, utilizing the Criminal Complaint Investigation Request.

OCI Unit Supervisor

23. Receives a report of investigation from the OCI Criminal Investigator. Reviews for completeness and accuracy.

24. If the report is complete and accurate, recommends to the OCI Chief an appropriate prosecution method. Proceeds to Step 26.

25. If the report is not complete and accurate, refers back to OCI criminal investigator for corrections or further investigation.

OCI Chief

26. Considers information and recommendation from Step 24 that criminal action be taken against an alleged violator.

27. If, in the judgment of the OCI Chief, a referral is appropriate, refers the information to the Assistant in Charge, Natural Resources and Environmental Quality Division, DAG.

28. If, in the judgment of the OCI Chief, a referral to the county prosecutor is appropriate, refers the information to the appropriate county prosecutor.

29. If, in the judgment of the OCI Chief, a referral to the U.S. Attorney is appropriate, refers the information to the appropriate federal agency.

30. Informs the Deputy Director for Programs and Regulations and the appropriate division/office chief on the referral decision.

Approved: _____

Date: _____

10/26/01

ATTACHMENT A

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

INTEROFFICE COMMUNICATION

[insert date]

TO: Arthur R. Nash Jr., Deputy Director

FROM: **[insert division chief's name]**, Chief, **[insert division name]** Division

SUBJECT: **[insert Site name]**, **[insert County name]** County
[insert Site ID No. or other division identifier]

The attached letter and briefing report are provided for your consideration. Please contact me at **[insert telephone number]** or **[insert name of other division contact/Compliance and Enforcement Chief]** at **[insert telephone number]** if you have questions regarding this matter.

Attachments

cc: **[insert name of other division contact]**, **[insert division acronym]**

EQ 0183 (03/2001)

ATTACHMENT B

STATE OF MICHIGAN



JOHN ENGLER, Governor

DEPARTMENT OF ENVIRONMENTAL QUALITY

"Better Service for a Better Environment"

HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48909-7973

INTERNET: www.deq.state.mi.us

RUSSELL J. HARDING, Director

[insert date]

{This is intended to be a ONE-PAGE letter. Use Arial 12 font, if possible, otherwise Arial 11 font will be accepted. Replace all bold text in brackets with the appropriate information. All information inserted into the document should follow the *Department of Environmental Quality Correspondence Guidelines.*}

ATTORNEY-CLIENT PRIVILEGE

The Honorable Jennifer M. Granholm
Attorney General
Department of Attorney General
P.O. Box 30212
Lansing, Michigan 48909

Dear Attorney General Granholm:

The Department of Environmental Quality (DEQ) requests Department of Attorney General (DAG) assistance in **[insert statement of goal (e.g. negotiating a legally binding agreement)]** related to the **[insert facility/company name]** Facility/Company. **[Briefly define the nature of the violation or other statutory provision that necessitates the referral. Include a reference to the specific statutory provision.]**

The DEQ requests that the DAG **[briefly describe the type(s) of action we are requesting the DAG to take (e.g. obtain site access or injunctive relief, negotiate a voluntary Administrative Order by Consent, provide counsel to an administrative action (DEQ UAO), file a complaint in an adversarial proceeding, etc.) Specify the specific statutory authority for that action (NREPA citation) and the specific elements that need to be addressed by the action (e.g. securing implementation of response activities, reimbursement of state costs, assessment of fines and penalties, assessment of natural resource damages, placement of a lien, etc.) [If appropriate, insert: If a voluntary agreement cannot be reached in a timely manner, we also request that the DAG take all necessary legal actions, including the filing of a lawsuit, to compel [insert name of person/entity] to comply with [specify provisions]**

ATTORNEY-CLIENT PRIVILEGE

The Honorable Jennifer M. Granholm

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[insert date]

[If applicable, insert: Assistant Attorney General [insert name] has previously assisted the DEQ in [action] concerning this site.] A briefing report is attached for your information. If you have any questions, please contact **[insert division chief's name]**, Chief, **[insert division name]** Division, at **[insert telephone number]**, or you may contact me.

Sincerely,

Russell J. Harding
Director
517-373-7917

Attachment

cc/att: Mr. A. Michael Leffler, DAG

Mr./Ms. **[insert Assistant Attorney General's name, if mentioned in closing paragraph]**, DAG

Mr. Arthur R. Nash Jr., Deputy Director, DEQ

Mr./Ms. **[insert division chief's name]**, DEQ

EQ0184 (3/2001)

ATTACHMENT C

STATE OF MICHIGAN



JOHN ENGLER, Governor

DEPARTMENT OF ENVIRONMENTAL QUALITY

"Better Service for a Better Environment"

HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48909-7973

INTERNET: www.deq.state.mi.us

RUSSELL J. HARDING, Director

[insert date]

{This is intended to be a ONE-PAGE letter. Use Arial 12 font, if possible, otherwise Arial 11 font will be accepted. Replace all bold text in brackets with the appropriate information. All information inserted into the document should follow the *Department of Environmental Quality Correspondence Guidelines with the exception of the closing paragraph (do not use "or you may contact me.")*}

ATTORNEY-CLIENT PRIVILEGE

The Honorable Jennifer M. Granholm
Attorney General
Department of Attorney General
P.O. Box 30212
Lansing, Michigan 48909

Dear Attorney General Granholm:

The **[insert division name and acronym]** is requesting Department of Attorney General (DAG) assistance in representing the **[insert division acronym] [insert statement of goal (e.g. "at an administrative hearing related to the denial of an application for permit for . . .")]**. The petitioner, **[insert name of petitioner]**, **[insert information pertaining to the case]**.

The **[insert division acronym]** requests that the DAG provide representation during the administrative hearing process because the petitioner is being represented by **[insert name of petitioner's counsel if available or "represented by counsel."]**. Therefore, we request assistance from the DAG in representing the **[insert division acronym]** during settlement discussions for both cases and throughout the hearing process.

ATTORNEY-CLIENT PRIVILEGE

The Honorable Jennifer M. Granholm

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[insert date]

[If applicable, insert: Assistant Attorney General [insert name] has previously assisted the [insert division acronym] concerning this site.] A briefing report is attached for your information. If you have any questions, please contact [insert division chief's name], Chief, [insert division acronym], at [insert telephone phone number].

Sincerely,

Russell J. Harding
Director
517-373-7917

Attachment

cc/att: Mr. A. Michael Leffler, DAG

Mr./Ms. **[insert Assistant Attorney General's name, if mentioned in closing paragraph]**, DAG

Mr. Arthur R. Nash Jr., Deputy Director, DEQ

Mr./Ms. **[insert division chief name]**, DEQ

EQ0185 (3/2001)

ATTACHMENT D

BRIEFING REPORT

[insert company/individual's name]
[insert facility/company street address]
[insert city name, county name] County, Michigan
Site ID No. [insert number]

{This briefing report is intended to follow the *Department of Environmental Quality (DEQ) Correspondence Guidelines* (page 52) for a Briefing Paper. Use Arial 12 font. If briefing is for a contested case referral, use the division name rather than department name.}

ATTORNEY-CLIENT PRIVILEGE

Issue

{State the issue in a clear and concise manner. This can be accomplished in a few sentences or greater detail, if necessary, to describe the issue.}

This briefing report has been prepared to support the referral of the **[insert facility/company name]** Facility/Company (Facility/Company) to the Department of Attorney General (DAG) for **[very briefly state the goal/objective of the referral (e.g. assistance in seeking site access or injunctive relief, negotiating a voluntary agreement, filing a complaint in an adversarial proceeding, etc.) and state the relief sought (e.g. to seek implementation of response activities, reimbursement of costs, placement of a lien, etc.)]**.

Background

{This section is intended to provide a basis or foundation to further describe the issue. Provide a summary of the RELEVANT site/company history to the issue at hand.}

[Include such information as:

- ◆ **Type of business conducted as it relates to the environmental problem.**
- ◆ **Location of the facility/company.**
- ◆ **Relative size of the environmental issue/facility or company.**
- ◆ **Names of liable parties (LP).**
- ◆ **Dates of ownership and/or operation of facility/company by LP along with supporting evidence.**
- ◆ **Factual basis to support the determination that there is/was a violation, or release or threatened release of hazardous substances, which exceeds an applicable discharge standard/cleanup criteria, including information that links the discharge/release or threatened release to the LP's activity that caused the discharge/release or threatened release. (*This may need to be tailored to each program area.*)**

ATTORNEY-CLIENT PRIVILEGE

Briefing Report

[insert company/individual name]

Page 2

- ◆ The nature and extent of response activities conducted to date, who conducted those response activities, and the results of investigations into the nature and extent of contamination. Include specific information regarding the performance of Remedial Investigation/Feasibility Study activities, interim response actions, or other response activities at the facility/company. Provide information on the documented concentrations of contaminants as compared to appropriate criteria in order to establish magnitude of problem.
- ◆ Summary of additional response activities that need to be performed at the facility/company.
- ◆ Use of affected properties - industrial, commercial, residential, etc.
- ◆ If applicable, impact on and/or damage to natural resources.
- ◆ Summary of response activities taken by the DEQ, if any, and the approximate costs incurred by the state to date.
- ◆ Describe other regulatory considerations, if applicable.]

Conclusion

[Describe the reasons why a referral is necessary, including a demonstration that the division has exhausted its administrative options or reasons why the problem is so egregious or of the nature that requires immediate referral to the DAG. For example, summarize relevant dates and types of actions initiated by the DEQ and the LP's response, both positive and negative, to DEQ requests, including DEQ requests that LP take response actions at the facility/company, and the LP's responses to information requests, notice letters, demand letters, attempted consensual agreement negotiation, etc. If the DEQ has had no recent contact with the LP, an effort should be made to determine the LP's current position regarding compliance/noncompliance prior to the referral being made (unless the violation is egregious).]

Recommendation

[Provide specific suggestions for resolution of the issue or problem including the relevant statutory remedies (and citations). Also describe why voluntary/DEQ compliance has not/will not be obtained and why DAG assistance is necessary. Include specific justification.]

Staff Contacts

{Revise this section as appropriate for each division.}

ATTORNEY-CLIENT PRIVILEGE

Briefing Report

[insert company/individual name]

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[insert project manager's name] is the project manager assigned to this Facility/Company and may be reached at **[insert telephone number]**. **[insert district enforcement coordinator's name]** is the district enforcement coordinator and may be reached at **[insert telephone number]**. We request that the attorney assigned to this case by **[insert Assistant in Charge]**, Assistant in Charge, contact **[insert compliance and enforcement chief's name]**, Chief, Compliance and Enforcement Section, **[insert name of division]**. **[insert compliance and enforcement chief's name]** will coordinate a team meeting at which a case strategy will be formulated and staff assignments will be made.

[Optional: The DAG staff time should be charged to Index Code No. **[insert number index code number]**, PCA No. **[insert PCA number]**, and Project Code No. **[insert project code number]**].

Prepared by: **[insert name and title]**
[insert district/section name]
[insert division name] Division
Department of Environmental Quality
[insert date]

EQ0186 (03/2001)

ATTACHMENT E



MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF CRIMINAL INVESTIGATIONS

CRIMINAL COMPLAINT INVESTIGATION REQUEST

INSTRUCTIONS: Any Department of Environmental Quality (DEQ) employee should immediately complete Section 1 upon receipt of information indicating that a felony criminal violation of any DEQ-administered regulation has occurred. This form is also to be used for referring suspected misdemeanor violations for criminal investigation in accordance with division/office priorities. Forward this form to your local DEQ Office of Criminal Investigations (OCI) Investigator for completion of Section 2. If you have questions about completion of this form, contact your district OCI Investigator or the OCI Headquarters at 517-335-3434.

***NOTIFY YOUR IMMEDIATE SUPERVISOR OF ALL CRIMINAL INVESTIGATION REFERRALS.**

SECTION 1 (to be completed by DEQ employee receiving complaint information) COMPLAINT INFORMATION		
1. COMPLAINANT NAME (person originally reporting incident to DEQ)		
2. COMPLAINANT ADDRESS (street, city, state, zip code)		3. COMPLAINANT TELEPHONE NUMBER (include area code) () -
4. DATE COMPLAINT RECEIVED	5. TIME COMPLAINT RECEIVED	6. COUNTY OF COMPLAINT LOCATION
7. COMPLAINT LOCATION (including street address, if known)		
8. NATURE OF COMPLAINT		
DID YOUR DIVISION RESPOND TO THIS COMPLAINT? <input type="checkbox"/> YES <input type="checkbox"/> NO IF YES, COMPLETE BOX 9; IF NO, SKIP BOX 9.		
9. PROVIDE INFORMATION ABOUT YOUR RESPONSE		
A. NAME AND TELEPHONE NUMBER OF STAFF RESPONDING		
B. SITE OBSERVATIONS (attach another sheet if necessary)		
10. VIOLATION(S) SUSPECTED (place justification for violation(s) on a separate sheet) <input type="checkbox"/> PART NUMBER _____ <input type="checkbox"/> MCL _____		
11. I REQUEST THE OCI TO: (Use additional sheets if necessary)		
12. NAME OF DEQ EMPLOYEE COMPLETING SECTION 1 (type or print)		13. DIVISION
14. SIGNATURE OF EMPLOYEE'S IMMEDIATE SUPERVISOR		15. DATE
SECTION 2 (to be completed by the OCI) OCI FOLLOW-UP AND INVESTIGATOR RECOMMENDATION		
16. DATE COMPLAINT RECEIVED BY OCI		17. TIME COMPLAINT RECEIVED BY OCI
18. COMPLAINANT CONTACTED (name, or anonymous ID number)		
19. COMPLAINANT'S ADDRESS (if anonymous, leave blank)		
20. COMPLAINANT'S PHONE NUMBER () -	21. DATE OF CONTACT	22. TIME OF CONTACT
23. LOCATION		
24. OBSERVATIONS		
25. NAME OF OCI INVESTIGATOR COMPLETING FORM (type or print)		26. DATE OCI RETURNED FORM TO DIVISION
27. DOES THIS MATTER WARRANT FURTHER ACTIVITY BY OCI? <input type="checkbox"/> YES <input type="checkbox"/> NO IF YES, COMPLETE BOX 28; IF NO, COMPLETE BOX 29.		28. CASE # ASSIGNED (if you answered "yes" in Box 27)
29. EXPLAIN WHY NO FURTHER ACTIVITY IS NECESSARY (if you answered "no" in Box 27) (use additional sheets if necessary)		