STATE OF MICHIGAN 65A JUDICIAL DISTRICT 29TH JUDICIAL CIRCUIT	COMPLAINT FELONY	DISTRICT: CIRCUIT: CTN: 96-23901251-01 MSP #: 2023-0367117
District Court ORI: MI190025J	Circuit Court ORI: MI190015J	AG ORI: MI820025A

THE PEOPLE OF THE STATE OF MICHIGAN	V Defendant's name and address JOEL DAVID BROWN [redacted]	Victim or complainant [redacted] Complaining Witness SHERIFF SEAN DUSH
Co-defendant(s) (If known) Tamal E Flore, Jerry R. Flore, Tammy L. Brown		Date: On or about 11/08/2009-08/01/2023

City/Twp./Village	County in Michigan	Defendant TCN	Defendant CTN	Defendant SID
Clinton County	CLINTON		96-23901251-01	

Defendant DOB	Defendant DLN	DLN Type:	Vehicle Type	Defendant Sex	Defendant Race
Put DOB in Ref. No. row 1 on MC 97	Put DLN in Ref. No. row 3 on MC 97			M	W

Police agency report no.	Charge	Maximum penalty
AG 2023-0367117	See below	See below

[ ] A sample for chemical testing for DNA identification profiling is on file with the Michigan State Police from a previous case.

STATE OF MICHIGAN COUNTY OF CLINTON

The complaining witness says that on the date and at Clinton County, the defendant, contrary to law,

COUNT 1: CHILD ABUSE - FIRST DEGREE
did knowingly or intentionally cause serious mental harm to a child; contrary to MCL 750.136b(2). [750.136B2]
FELONY: Life or any term of years

COUNT 2: CONSPIRACY TO COMMIT CHILD ABUSE - SECOND DEGREE
did unlawfully conspire, combine, confederate and agree together with (1) Jerry Flore, Tamal Flore, and/or Tammy Brown and/or other unknown person to commit the following listed offense; contrary to MCL 750.157a: Child Abuse 2nd Degree, prohibited by MCL 750.136b(3)-(4). [750.136B3]
FELONY: 10 Years

COUNT 3: CHILD ABUSE - 3RD DEGREE
did knowingly or intentionally cause physical harm to a child; contrary to MCL 750.136b(5). [750.136B4]
FELONY: 2 Years or probation for up to 5 years [See MCL 771.2a(3)]

COUNT 4: INTERFERING WITH CRIME REPORT
✓ did through the unlawful use of physical force, prevent or attempt to prevent another person from reporting a crime committed or attempted by another person; contrary to MCL 750.483a(2)(a). [750.483A2A]
MISDEMEANOR: 1 Year and/or $1,000.00

COUNT 5: CHILDREN - ABUSE - FAILURE TO REPORT
did, knowingly fail to report suspected child abuse or neglect; contrary to MCL 722.633(2). [722.6332]
MISDEMEANOR: 93 Days and/or $100.00

Court shall order law enforcement to collect a DNA identification profiling sample before sentencing or disposition, if not taken at arrest.

The complaining witness asks that the defendant be apprehended and dealt with according to law.

Warrant authorized on 12/01/2023 by:
Date
Melissa Palepu

Melissa Palepu (P74121)
Criminal Trials & Appeals Division
3030 W. Grand Blvd., Suite 10-300
Detroit, MI 48202
313-456-0180

☐ Security for costs posted

I declare under the penalties of perjury that this complaint has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

701
Complaining Witness Signature

12-4-23
Date

☐ COPY