STATE OF MICHIGAN 65A JUDICIAL DISTRICT 29TH JUDICIAL CIRCUIT	COMPLAINT FELONY	DISTRICT: CIRCUIT: CTN: 96-23901250-01 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: **JERRY RONALD FLORE** [redacted]

Victim or complainant: [redacted]

Complaining Witness: **SHERIFF SEAN DUSH**

Co-defendant(s) (If known): Tamal E Flore, Joel D. Brown, 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**		**96-23901250-01**	

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: 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 3: 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 4: 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 5: 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 6: 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 7: CHILD ABUSE FIRST DEGREE – COMMITTED IN PRESENCE OF ANOTHER CHILD
Did knowingly or intentionally cause serious mental harm to a child in the presence of another child; contrary to MCL 750.136d(1)(a). [750.136D1A]
FELONY: Life or any term of years

COUNT 8: CONSPIRACY TO COMMIT CHILD ABUSE - SECOND DEGREE
did unlawfully conspire, combine, confederate and agree together with (1) Tamal E. Flore, Joel Brown, 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[C]]
FELONY: 10 Years

COUNT 9: CHILD ABUSE - SECOND DEGREE
did knowingly or intentionally commit an act likely to cause serious physical or mental harm to a child by continually emotionally abusing child, isolating child, verbal abuse, and/or excessive discipline; contrary to MCL 750.136b(3)-(4). [750.136B3]
FELONY: 10 Years

COUNT 10: CHILD ABUSE - SECOND DEGREE
did knowingly or intentionally commit an act likely to cause serious physical or mental harm to a child by continually emotionally abusing child, isolating child, verbal abuse, and/or excessive discipline; contrary to MCL 750.136b(3)-(4). [750.136B3]
FELONY: 10 Years

COUNT 11: 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

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.

Complaining Witness Signature

12-4-23
Date

COPY