

AG CASE

STATE OF MICHIGAN
65A JUDICIAL DISTRICT
29TH JUDICIAL CIRCUIT

COMPLAINT
FELONY

DISTRICT:
CIRCUIT:
CTN: 96-23901252-01
MSP #: 2023-0367117-A
AG ORI: MI820025A

District Court ORI: MI190025J

Circuit Court ORI: MI190015J

Defendant's name and address
THE PEOPLE OF THE V TAMMY LYNN BROWN

Victim or complainant

STATE OF MICHIGAN

Complaining Witness
SHERIFF SEAN DUSH

Co-defendant(s) (If known)
Tamal E. Flore, Jerry R. Flore, Joel D. Brown

Date: On or about
11/08/2009-08/01/2023

City/Twp./Village Clinton County	County in Michigan CLINTON	Defendant TCN 96-23901252-01	Defendant CTN 96-23901252-01	Defendant SID
Defendant DOB Put DOB in Ref. No. row 1 on MC 97	Defendant DLN Put DLN in Ref. No. row 3 on MC 97	DLN Type:	Vehicle Type	Defendant Sex F
Police agency report no. AG 2023-0367117-A	Charge See below			Defendant Race W
				Maximum penalty 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, Joel Brown, and/or Tamal Flore 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 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)]

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 <u>12/3/2023</u> by: <u>Melissa Palepu</u> Date
Melissa Palepu (P74121)
Criminal Trials & Appeals Division 3030 W. Grand Blvd., Suite 10-300 Detroit, MI 48202 313-456-0180 <input type="checkbox"/> 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

Date

12/4/23

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