

AG CASE

STATE OF MICHIGAN
65A JUDICIAL DISTRICT
29TH JUDICIAL CIRCUIT

COMPLAINT FELONY

DISTRICT:
CIRCUIT:
CTN: 96-23901248-01
MSP #: 2023-0367117-A

District Court ORI: MI190025J

Circuit Court ORI: MI190015J

AG ORI: MI820025A

THE PEOPLE OF THE STATE OF MICHIGAN	v	Defendant's name and address TAMAL ELAINE FLORE [REDACTED]			Victim or complainant [REDACTED]	
		[REDACTED]			Complaining witness SHERIFF SEAN DUSH	
Co-defendant(s) (If known) Jerry R. Flore, Joel D. Brown, Tammy L. Brown				Date: On or about 11/08/2009 TO 08/01/2023		
City/Twp./Village Clinton County		County in Michigan CLINTON	Defendant TCN	Defendant CTN 96-23901248-01	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	Defendant Race W	
Police agency report no. AG 2023-0367117-A	Charge See below	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: 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 THE PRESENCE OF ANOTHER CHILD

did knowingly or intentionally cause serious mental harm to 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) Jerry 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 750.157a: Child Abuse 2nd Degree, prohibited by 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 750.157a: Child Abuse 2nd Degree, prohibited by MCL 750.136b(3)-(4). [750.136B3] FELONY: 10 Years

COUNT 11: 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 12: 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 13: 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 14: 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 15: 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 16: 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 17: 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 <u>12/01/2023</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.

[Signature]
Complaining Witness Signature
12-4-23
Date

COPY