

STATE OF MICHIGAN 67th JUDICIAL DISTRICT 7th JUDICIAL CIRCUIT	COMPLAINT FELONY	CASE NO. 167F-1685 P DISTRICT CIRCUIT
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District Court ORI: MI-

Circuit Court ORI: MI-

THE PEOPLE OF THE STATE OF MICHIGAN	Defendant's name and address CORINNE MILLER 411 West Washington St. Dewitt, Michigan 48820-8925	Victim or complainant J. SEIPENKO
Codefendant(s) (if known) Robert Scott, Nancy Peeler		Complaining witness J. SEIPENKO
		Date: On or about April 2014 through November 2015
City/Twp./Village City of Flint	County in Michigan Genesee	Defendant TCN
		Defendant CTN
		Defendant SID
		Defendant DOB 08/23/1950
Police agency report no.	Charge Misconduct in Office, Conspiracy, Neglect of Duty	Maximum penalty 5 years
<input type="checkbox"/> A sample for chemical testing for DNA identification profiling is on file with the Michigan State Police from a previous case.	<input type="checkbox"/> Oper./Chauf. <input type="checkbox"/> CDL	Vehicle Type M
		Defendant DLN M

Witnesses
S/A J. Seipenko
S/A W. Cousins
S/A A. Wimmer
Miguel Del Toral
Marc Edwards
Dr. Mona Hanna-Attisha
James Henry
Brian Steglitz
LeeAnne Walters
Brent Wright
Victor Yu
Sarah Lyon-Callo
Cristin Larder

STATE OF MICHIGAN, COUNTY OF Genesee

The complaining witness says that on the date and at the location described, the defendant, contrary to law, COUNT 1 - COMMON LAW OFFENSES - MISCONDUCT IN OFFICE did, on or about April 2014 through on or about August 2015, said dates being approximate, commit misconduct in office, an indictable offense at common law, by willfully and knowingly instructing employees of the Department of Health and Human Services to ignore valid reports of the increase in blood lead levels of children in Genesee County; in violation of her duty to promote and protect the health of the citizens of the County of Genesee, State of Michigan; contrary to MCL 750.505. [750.505] FELONY: 5 Years and/or \$10,000.00

COUNT 2 - CONSPIRACY did unlawfully conspire, combine, confederate and agree with others, both known and unknown to the People of the State of Michigan, to commit an offense prohibited by law, to wit: Misconduct in Office as alleged in Count 1; contrary to MCL 750.157a. [750.505C] FELONY: 5 Years and/or \$10,000.00

COUNT 3 - PUBLIC OFFICER - WILLFUL NEGLECT OF DUTY did willfully neglect to perform the duty of promoting and protecting the health of the citizens of the County of Genesee, State of Michigan enjoined upon her by the Michigan Public Health Code, MCL 333.5111(1), MCL 333.5111(2)(f) and MCL 333.20531 and the Critical Health Problems Reporting Act, MCL 325.71, et seq.; contrary to MCL 750.478. [750.478] MISDEMEANOR: 1 Year and/or \$1,000.00

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

Warrant authorized on <u>7-29-16</u> by:	Date
	<u>7/29/16</u>
Prosecuting official	
<input type="checkbox"/> Security for costs posted	

	Complaining witness signature
Subscribed and sworn to before me on <u>7/29/16</u>	Date
	Judge/Magistrate/Clerk
	Bar no.

7-29-16