## State of New York Local Criminal Court

County of Albany Town of Guilderland

The People of the State of New York)

- Vs.-Tod J Mell COMPLAINT

BE IT KNOWN THAT, by this complaint, Sr/Investigator Thomas H Funk as complainant herein, stationed at the Guilderland Police Department Guilderland, NY accuses the above mentioned defendant, with having committed the Class A Misdemeanor of ENDANGERING THE WELFARE OF A CHILD, in violation of section 260.10, sub-division 1 of the Penal Law of the State of New York.

That between October 2010 and June 2011at Lynnwood Elementary School, 8 Regina Dr, in the Town of Guilderland, County of Albany, and State of New York the defendant did intentionally, knowingly and unlawfully commit the crime of Endangering the welfare of a child. A person is guilty of endangering the welfare of a child when: He knowingly acts in a manner likely to be injurious to the physical, mental or moral welfare of a child less than seventeen years old or directs or authorizes such child to engage in an occupation involving a substantial risk of danger to his life or health.

To Wit; the said defendant did between the above said dates and at the above location intentionally, knowingly and unlawfully engage in unlawful physical contact with a known juvenile female with a DOB: who at the time was less than seventeen years old. All contrary to the provisions of the statute in such case made and provided.

The above allegations of fact are made by the complainant herein upon information and belief, with the sources of complainant's information and the grounds for belief being conversations with a known juvenile female with a date of birth of during the Criminal Investigation by members of the Guilderland Police.

In a written instrument, any person who knowingly makes a false written statement which such person does not believe to be true has committed a crime under the laws of the State of New York punishable as a Class A Misdemeanor. (PL 210.45)

Affirmed under penalty of perjury This 4<sup>th</sup> day of October 2018.

SK/Am Our

Complainant