

STATE OF MAINE
PENOBSCOT, ss.

SUPERIOR COURT
CRIMINAL ACTION
DOCKET NO. CR-25- 2271

STATE OF MAINE

CRIMINAL COMPLAINT FOR
VIOLATION OF:

V.

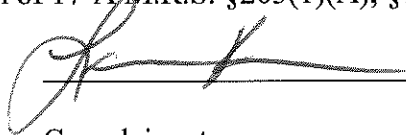
KELLY SANDERS BROWN
DOB: 03/29/1985
Address: 2540 Prescott Road
Havertown, PA 19083
Height: 5'08" Weight: 160 lbs.
Hair: Brown Eyes: Blue

COUNT I
17-A M.R.S. § 203(1)(A), § 1604(7)(A) &
§1804(3)(A)
MANSLAUGHTER
(CLASS A)

ATN No. 565493B
CTN No. 001
Sequence No.: 004248

Detective Lawrence Anderson, Maine State Police- Major Crimes Unit- North, being first
duly sworn, deposes and states upon information and belief that:

On or about August 9, 2025, in the Town of Milford, Penobscot County, State of Maine,
KELLY SANDERS BROWN (DOB: 03/29/1985), did recklessly or with criminal negligence cause
the death of another human being, namely **FIONA BROWN** (DOB: 09/08/2021), a child who had
not, in fact, attained the age of six (6) years at the time the crime was committed and the said
FIONA BROWN was a family or household member of the said **KELLY SANDERS BROWN** as
defined in 19-A M.R.S. §4002(4), all in violation of 17-A M.R.S. §203(1)(A), §1604(7)(A) &
§1804(3)(A).


Complainant

Sworn to before me this ___ day of August 11th, 2025.


CLERK/NOTARY PUBLIC/JUDGE
Ass't

AFFIDAVIT IN SUPPORT OF PROBABLE CAUSE
(M.R. CRIM P.5 (d))

I, Detective Lawrence Anderson, of the Maine State Police, state under oath:

Kelly S. Brown, whose date of birth is **DOB 03-29-1983**, committed the crime of **Maine Criminal Code Title 17-A M.R.S. §203(1)(A), Manslaughter** on the basis of the attached affidavit, attached hereto and incorporated herein by reference, said report being true to the best of your Affiant's knowledge, information and belief.

The facts and circumstances, which lead your Affiant to believe this, are as follows:

SUMMARY OF FACTS

Your affiant, Det. Lawrence Anderson, being duly sworn, depose and say that I have been a law enforcement officer in the State of Maine for the past 22 years. I have been assigned to the Maine State Police, Major Crimes Unit-North, as a Detective for over 9 years. Prior to that, I was a Trooper with the Maine State Police for over 8 years, beginning in May of 2007. Prior to that, I was a Police Officer for the City of Waterville, beginning in January of 2003. I hold a bachelor's degree in law enforcement. As part of my duties with the Maine State Police, I successfully completed the Maine Basic Law Enforcement Training Program and the Maine State Police Basic Training School, which were both conducted by the Maine Criminal Justice Academy in Vassalboro, Maine. I have received specialized training by the Maine State Police Evidence Response Team along with the Maine State Police Crime Laboratory, I have attended Homicide Investigation School and have received training in Search Warrant drafting and preparation, and Interview and Interrogation classes. During my career as a law enforcement officer, I have investigated numerous serious crimes including, but not limited to, Murder, Sexual Assault, Burglary, Felony Theft, Domestic Violence, Death Scenes and Child Abuse. My involvement in criminal investigations has included the preparation and execution of search warrants, the interview and interrogation of suspects and witnesses, and the arrest of persons charged with the above-listed crimes. I have personal knowledge of the facts and circumstances hereinafter as a result of my own investigative efforts and the efforts of other officers.

1. On August 9, 2025, at approximately 9:30 P.M. I was called out by Major Crimes Unit North (MCU-N) Sergeant Greg Mitchell to respond to 12 Main Road in Milford, to help investigate a suspicious death. I was told that a three-year-old child, identified as Fiona Brown (DOB 09-08-2021), was found deceased inside a vehicle in the parking lot and her mother, identified as Kelly Brown (DOB 3-29-1985), was on scene.
2. On August 9, 2025, at approximately 10:28 P.M, I arrived at 12 Main Road in Milford, and made contact with MCU-N Detective Jennifer Fiske, MCU-N Detective Dana Austin and Cpl. Randall Medeiros from the Penobscot County Sheriff's Office.
3. On August 9, 2025, at approximately 11:15 P.M I learned the following from talking to Detective Sgt. Dayerrick Ireland from the Penobscot County Sheriff's Office:

- a. Detective Sgt. Ireland had reviewed surveillance video footage from the back parking lot of Freshies, a convenience store located at 12 Main Road, in Milford, Maine.
 - b. Detective Sgt. Ireland learned from surveillance video footage that on August 9, 2025, at 2:00 A.M. a white Nissan Murano was seen parked in the back parking lot and a female, later identified as Kelly Brown, was seen exiting the driver's side of the vehicle. On August 9, 2025, at 5:56 A.M. Kelly exited the driver's side of the vehicle again and she walked away from the vehicle and disappeared off the screen.
 - c. Det. Sgt. Ireland stated that the vehicle was in the same location throughout the surveillance video footage and was in that location when deputies arrived.
4. On August 9, 2025, while at 12 Main Street in Milford, I made contact with Evidence Response Team Member Sergeant Micah Perkins. I observed the white Nissan Murano parked in the back parking lot of Freshies and the body of Fiona Brown and a dog inside the car. After Sergeant Perkins took scene photos, he and I removed Fiona Brown's body from the car. We placed Fiona Brown's body into a body bag. I observed the following during this process:
 - a. Fiona Brown's body was resting, face down, on the driver's side seat very close to the driver's side door. Her upper torso was resting on the seat cushion, and her knees were resting on the driver's side floor.
 - b. There was a small, deceased dog on the driver's side floor. It was later determined from photographs that the dog's head was resting on Fiona Brown's right foot.
 - c. Both rigor mortis and liver mortis were present in Fiona Brown's body, indicating that Fiona Brown's body had been in that position for some time. The rigor mortis and liver mortis were both consistent with Fiona Brown expiring in the same location and position that she was found in.
 - d. Sergeant Micah Perkins and I examined Fiona Brown's body and observed no indicators of significant blunt force trauma or other obvious causes of Fiona's death, other than her exposure to extreme heat in the locked car. Sgt. Micah Perkins and I secured paper evidence bags around Fiona Brown's hands. Sgt. Micah Perkins secured Fiona Brown's body bag with a plastic, locking evidence tag.
5. On August 10, 2025, at approximately 1:25 A.M. I assisted Birmingham's Funeral Home with the removal of Fiona Brown's body from the scene.

6. On August 10, 2025, Sgt. Micah Perkins advised me that he had secured the white Nissan Murano's doors with evidence tape.
7. On August 10, 2025, I made contact with Detective Sgt. Dayerrick Ireland. Detective Sgt. Ireland informed me that he reviewed Freshies back parking lot surveillance video footage twice and he learned after Kelly Brown walked away from her vehicle at 5:56 A.M. on August 9, 2025, and never returned to the vehicle. Detective Sgt. Ireland informed me that Kelly Brown returned to the parking lot area around 8:30 P.M. on August 9, 2025, after police and EMS had arrived.
8. On August 10, 2025, at approximately 2:40 A.M., I observed as Kelly Brown's Nissan Murano was towed to the Maine State Police Bangor Barracks garage by Bouchard's Towing Service. I followed the tow truck and observed the transfer. Upon arrival at the State Police Barracks garage, 198 Maine Avenue in Bangor, I observed Bouchard's Towing Employee Richard Trennam (DOB 1-10-1991) unload the vehicle from the tow truck. I then ensured the vehicle was secured in the evidence garage bay.
9. On August 10, 2025, I learned the following information from Major Crimes Unit North (MCU-N) Det. Dana Austin:
 - a. On August 9, 2025, at 10:20 P.M. Det. Dana Austin arrived at the Freshies store located at 12 Main Road in Milford. Det. Austin and Major Crimes Unit North (MCU-N) Det. Jennifer Fiske spoke to Cpl. Randall Medeiros of the Penobscot County Sheriff's Office who was the first officer on scene.
 - b. Cpl. Medeiros reported to Det. Austin and Det. Fiske that at approximately 3:30 P.M. Kristin Sanders (DOB 5-28-1958) of Plymouth, Massachusetts reported her daughter, Kelly Brown (DOB 3-29-1985) and her granddaughter Fiona Brown (DOB 9-8-2021) missing.
 - c. Kristin Sanders reported to Cpl. Medeiros that Kelly and Fiona Brown lived in Havertown Pennsylvania, but they would come up every summer for approximately a month to visit family. Kelly Brown, Fiona Brown, and the family dog were believed to have left Pennsylvania on July 30, 2025. Kelly Brown and Fiona Brown stopped at Kristin Sanders residence in Plymouth Massachusetts (July 30, 2025) and stayed the night.
 - d. Kristin Sanders reported to Cpl. Medeiros that Kelly Brown and Fiona Brown left Plymouth and stayed at Kristin Sanders' summer residence located at 51 Hendrickson Lane in Clifton, Maine on July 31, 2025.

- e. Kristin Sanders reported to Cpl. Medeiros that Kelly and Fiona Brown stayed with Kelly Brown's grandmother, Jeanie-Dawn Maddocks, from August 1, 2025, through August 7, 2025, on Ambajejus Lake in northern Penobscot County.
- f. Kristin Sanders reported to Cpl. Medeiros that Kelly Brown and Fiona Brown were supposed to return to 51 Hendrickson Lane in Clifton on August 7, 2025, but they never returned. Kristin Sanders reported to Cpl. Medeiros that she contacted Kelly Brown and spoke to her on the phone. Kelly Brown told Kristin Sanders that she and Fiona Brown were camping along the Penobscot River.
- g. Kristin Sanders reported to Cpl. Medeiros that Kelly Brown had been posting bizarre things on her social media accounts over the last few weeks. Kristin Sanders reported that Kelly Brown told her she (Kelly Brown) had been seeing spirits.
- h. Cpl. Medeiros stated there were some communications with the law enforcement authorities in Pennsylvania about issuing a missing person file. Ultimately it was decided that the Penobscot County Sheriff's Office would issue the missing person file. Cpl. Medeiros stated that they began pinging Kelly Brown's phone number (610-761-5376). Cpl. Medeiros stated the Penobscot County Sheriff's Office received the first ping at 8:12 P.M. The ping was within 1000 meters of the tower near the Freshies Store in Milford.
- i. Cpl. Medeiros stated he ultimately located Kelly Brown's White Nissan Murano bearing Pennsylvania registration MVF7906 backed into a parking spot in the back of the parking lot of the Freshies Store (12 Main Road, Milford).
- j. Cpl. Medeiros looked through the driver's side window and noticed what appeared to be a deceased dog lying on the driver's side floorboard. Cpl. Medeiros continued to look through the driver's side window and he observed a young female child lying partially on the driver's side seat. Cpl. Medeiros stated the doors were locked in the vehicle. Cpl. Medeiros could not tell if the child was alive. Cpl. Medeiros broke out the front passenger side window and made entry into the vehicle. Cpl. Medeiros stated that the dog and child were deceased in the vehicle.
- k. While Cpl. Medeiros was dealing with this incident, Kelly Brown appeared from the back of the Freshies Store. Kelly Brown told Cpl. Medeiros that she had fallen into the Penobscot River. Cpl. Medeiros noted that Kelly Brown did not appear to be wet. Kelly Brown did not ask Cpl. Medeiros what was going on despite several police cruisers and EMS vehicles that had arrived on scene.
- l. Cpl. Medeiros stated that Dep. Christopher Bouchard responded to the Freshies Store on August 9, 2025, at approximately 2:30 A.M. to investigate an unrelated

incident. During that incident, Dep. Bouchard spoke to Kelly Brown who provided Dep. Bouchard with information related to the incident he was investigating. Dep. Bouchard also noticed a small child standing on a seat inside Kelly Brown's White Nissan Murano bearing Pennsylvania registration MVF7906.

10. On Sunday, August 10, 2025, I learned the following information from Det. Jennifer Fiske:

- a. She and Det. Dana Austin interviewed Kelly Brown (DOB 03-29-85) on Saturday, August 9, 2025, at 11:51 P.M. at the Major Crimes Unit North Office located at 198 Maine Ave in Bangor, Maine.
- b. During this interview, Kelly Brown reported she lives at 2540 Prescott Road in Havertown, Pennsylvania.
- c. Kelly Brown has a three-year-old daughter named Fiona Brown (DOB 09-08-21).
- d. Kelly Brown has extended family to include her mother, grandmother, and cousins in the State of Maine, whom she visits for approximately 1 month every year.
- e. Kelly Brown's husband, Michael Brown (DOB 01-10-1988) usually accompanies Kelly Brown on her vacation to Maine; however, this year, Michael Brown could not take the time off from work to join Kelly Brown and Fiona Brown on their trip to Maine.
- f. Kelly Brown took Fiona Brown, and their small 13-year-old family dog, Penelope, on the trip to Maine leaving Havertown, PA on Wednesday, July 30, 2025.
- g. Kelly Brown drove her white Nissan Murano with PA registration plates on the trip to Maine.
- h. On their way to Maine, Kelly Brown, Fiona Brown, and Penelope stopped to spend the night at Kristen Sanders' residence located at 21 Shinglewood in Plymouth, Massachusetts. Kristen Sanders is the mother of Kelly Brown and the grandmother of Fiona Brown. Kristen Sanders was home at the time of Kelly Brown's visit on July 30, 2025.
- i. Kristen Sanders also owns a camp located at 51 Hendrickson Road in Clifton, Maine on Springy Pond. Kelly Brown, Fiona Brown, and Penelope drove from Kristen Sanders' home in Plymouth, Massachusetts to Kristen Sanders' camp in Clifton, Maine where they spent the night of Thursday, July 31, 2025.

- j. On Friday, August 1, 2025, Kelly Brown, Fiona Brown, and Penelope drove to the camp of Kelly Brown's grandmother Jeanie-Dawn Maddocks located on Ambajejus Lake near Millinocket, Maine on Fire Lane 18. Kelly Brown, Fiona Brown, and Penelope stayed at Jeanie-Dawn's Millinocket camp from Friday, August 1, 2025, to Thursday, August 7, 2025. Kelly Brown's cousin, Sarah De Preter, Sarah's husband, and Sarah's two daughters were also at Jeanie Dawn Maddocks' camp visiting.
- k. Kelly Brown, Fiona Brown and Penelope left Millinocket on Thursday, August 7, 2025, and worked their way towards Kristen Sanders' camp in Clifton, Maine.
- l. Kelly Brown reported that she, Fiona Brown, and Penelope camped out along the Penobscot River in her Nissan Murano in various unknown locations, boat launches, or rest stops along the way back to Clifton. Kelly Brown stated that they were on the road camping out on Thursday, August 7, Friday, August 8, and Saturday, August 9.
- m. Kelly Brown stated that as they stopped along the way, she noticed a lot of trash at these rest areas and boat landings and decided that she would teach Fiona Brown about nature and how to keep it clean, so they began to pick up and collect the trash.
- n. Kelly Brown, Fiona Brown, and Penelope spent a lot of the day on Friday, August 8, and Saturday, August 9, cleaning up around Freshies (store) because it was such a mess. Kelly Brown stated that Freshies is along the Penobscot River and that on Friday, August 8, 2025, she had spoken with a manager at Freshies who had provided her with gloves and trash bags.
- o. After cleaning on Friday, Kelly Brown told Fiona Brown that they needed to go rest and have a camp out in their car and that they would go back to Freshies the next day.
- p. Kelly Brown, Fiona Brown, and Penelope returned to Freshies during the early morning hours this morning (Saturday, August 9, 2025) and were continuing with their mission of cleaning up. Kelly Brown and Fiona Brown had left trash bags here and there as they were filled up rather than having brought each one immediately to the dumpster behind Freshies.
- q. Kelly Brown put Fiona Brown and Penelope inside her car which was parked along the tree line of the Freshies' parking lot. According to Kelly Brown, both Fiona and Penelope were alive when she left them in the closed locked car.

- r. Kelly Brown was just going to retrieve one of the trash bags and throw it away while Fiona Brown and Penelope were in the car and then they were going to leave.
- s. Kelly Brown left Fiona Brown and Penelope inside the car while she went to the dumpster across the parking lot to throw the trash bag away. Kelly intended on quickly throwing the bag away and then getting in the car with Fiona Brown and Penelope and leaving.
- t. Kelly Brown estimated that this had occurred at about 2:00 PM on August 9, 2025
- u. While carrying the bag to the opposite side of the parking lot, Kelly Brown noticed that some trash had strewn out of the bag. Kelly Brown went to fetch a couple of the pieces of trash. Kelly Brown reached down to grab the trash that had blown down on the embankment, not realizing that it was as steep as it was. Kelly Brown's feet slipped out from under her and she slid down the embankment and ended up in the river, getting all scratched up.
- v. Kelly Brown reported that the river was rocky and scary and before she knew it, she got caught up in the riptide, was being whipped around and fighting to stay above the water. The water was shallow, and Kelly Brown was thrown all around and repeatedly hit the rocks
- w. Kelly Brown swam as hard as she could to get to the other side of the river because the water pulled her toward the center of the river. Kelly managed to get to the other side of the river, underneath the bridge.
- x. Kelly Brown was shaken up but realized that she had to get back to Fiona Brown and Penelope.
- y. Kelly Brown sat there for a moment to recuperate and catch her breath for a bit. Kelly Brown fought her way back up to the train trestle and was in so much pain.
- z. By the time Kelly Brown got back to Freshies parking lot she noticed that there were cops and an ambulance there, and she didn't know what was going on. Kelly Brown believed that Fiona Brown had been taken to the hospital.
- aa. Kelly Brown was approached by one of the officers who asked if the Nissan Murano was her vehicle. Kelly Brown advised that the whole time she was gone she was desperate to get back because she knew Fiona Brown and Penelope were in the car and she did not know how ventilated the car was as she had not cracked any windows for them. Kelly Brown was thankful that it had been a cooler day and did not recall what the temperature had been.

- bb. Kelly Brown spoke to the officer who asked her where she had been and why she had left the dog and the child alone in the car. Kelly Brown did not know how long she had gone but thought it had been hours.
 - cc. Kelly Brown reported that the clothing she had on during the interview was the same clothing she had been wearing when she fell into the water. Kelly Brown advised that her clothes were no longer wet as it had been hours since she had allegedly fallen in the river.
 - dd. Kelly Brown had left Fiona Brown and Penelope in the front seat of the car as they were going to have a quick snack before they left to go back to her mother's camp in Clifton.
 - ee. Kelly Brown was told that Fiona Brown and Penelope had not survived. Kelly Brown had not realized that Fiona Brown and Penelope were dead and began to scream. Kelly Brown stated that Fiona Brown and Penelope were her world, and she didn't know what to do.
 - ff. Kelly Brown allowed Det. Fiske to photograph numerous scratches and bruises on both her lower arms and lower legs. Kelly Brown claimed that the injuries had occurred when she fell down the embankment and into the Penobscot River.
 - gg. Kelly Brown provided Det. Fiske with the clothing she was wearing and was given a set of scrub pants, shirt, and booties to wear.
 - hh. Kelly Brown was transported to Northern Light EMMC to be medically cleared.
 - ii. Kelly Brown was then arrested for Manslaughter and transported to Penobscot County Jail where she was held without bail.
11. On August 10, 2025, I learned the following information from Major Crimes Unit-North (MCU-N) Det. Matthew Rose:
- a. On August 10, 2025, at 1:02 P.M., Det. Matthew Rose spoke with Sgt. Gavin Endre of the Maine State Police in reference to obtaining License Plate Reader (LPR) data to check if the vehicle belonging to Kelly Brown had registered in Maine dating back to August 1, 2025. Kelly Brown's vehicle displayed PA registration plate MVF7906.
 - b. Sgt. Endre was able to obtain the data and provided me with an LPR printout. The printout showed an image of a white Nissan SUV bearing PA registration MVF7906. The vehicle registered on the Maine Penobscot Nation Police Department reader on Down Street on Indian Island Maine on August 1, 2025, at

7:34 P.M. UTC time. The GPS coordinates associated with the vehicle's location is 44.942554, -68.652235.

12. On August 10, 2025, I learned the following information from Det. Matthew Rose after he interviewed Kristin Sanders (DOB 05-28-1958), the mother of Kelly Brown:

- a. On August 9, 2025, at 02:17 A.M., Kristin Sanders sent text messages to Kelly Brown asking her where she was and why she wasn't staying at her camp. Kelly Brown told her that she was parked in a gas station and had lost her phone but had found it and everything was okay.
- b. Kelly Brown had begun posting videos to her Facebook account "Health Coach Brown" that Kristin described as "disturbing." Kelly began posting these videos around July 25, 2025. Kristin Sanders advised Kelly Brown's behavior changed significantly from her normal behavior.
- c. Kelly Brown reported to Kristin Sanders that she had been hallucinating, was hearing voices of shamans, and seeing people that weren't there. Kelly Brown also said that the voices she was hearing were telling her what to do.

13. On August 10, 2025, I learned the following information from Maine State Police Special Investigator David Simmons.

- a. On August 10, 2025, Investigator Simmons interviewed Ryan Lucey (DOB 12-26-1980) and his wife Sarah De Preter (DOB 10-11-1983) on the telephone. The conversation was concerning their interactions with Kelly Brown (DOB 3-29-1985) while at the family camp on Ambajejus Lake. Sarah De Preter and Ryan Lucey both said that they noticed a change in Kelly Brown. Ryan Lucey said that he noticed Kelly Brown had a higher level of spiritual change. Sarah De Preter mentioned that Kelly Brown was quite emotional and had been talking about Norse Gods and Deities. It was also mentioned that Kelly Brown had been performing rituals described as urinating on rocks in public places. Sarah De Preter said that Kelly Brown had been an alcoholic and had recovered. Sarah De Preter was certain Kelly Brown had not relapsed. Sarah De Preter also said that she thought Kelly Brown was off her prescribed medication for her anxiety. Sarah De Preter said that Kelly Brown may have been using marijuana.
- b. Ryan Lucey said that during their time on Ambajejus Lake, Fiona Brown appeared to be a happy and healthy little girl.

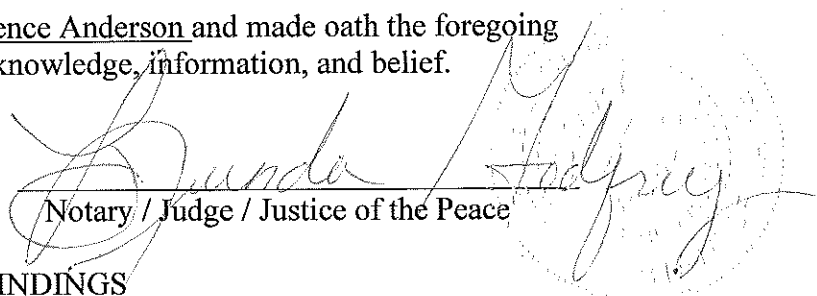
- c. Sarah De Preter said her last communications with Kelly Brown were two text messages at 12:26 A.M. and 12:27 A.M. on August 9, 2025, and a Facebook Messenger message at 6:36 P.M. on August 9, 2025.
14. On August 10, 2025, I learned the following information from Major Crimes Unit-North (MCU-N) Det. Cpl. Andrew Peirson:
 - a. Det. Cpl. Peirson visited <https://www.wunderground.com/> Internet website to obtain historical weather data for August 9, 2025, for Milford, Maine. Det. Cpl. Peirson learned that Weather Underground is a commercial weather service known for providing real-time, hyperlocal weather information via the internet. Det. Cpl. Peirson entered zip code 04461 into the search location bar. The weather location defaulted to the Bangor International Airport Station in Bangor, Maine.
 - b. Det. Cpl. Peirson observed that the low temperature recorded on August 9, 2025, was 59 degrees Fahrenheit and the high temperature was recorded as 82 degrees Fahrenheit.
 - c. Det. Cpl. Peirson conducted research online about how temperatures inside closed vehicles rise on hot days. Det. Cpl. Peirson advised me that based on his research and his own experience of entering a closed vehicle on a hot day, the interior temperature of the vehicle is dangerously higher than the ambient temperature outside.
15. On August 11, 2025, I consulted with Deputy Chief Medical Examiner Dr. Liam Funte of the Office of Chief Medical Examiner regarding the autopsy results for Fiona Brown. Dr. Funte advised that Fiona Brown's cause and manner of death are pending additional studies, however hyperthermia is consistent with the symptoms presented and is the most likely cause of death at this time.
16. This affidavit had been reviewed by Assistant Attorney General Leanne Robbin who has been a prosecutor for several years and has reviewed hundreds of search warrants.

CONCLUSION

Investigation revealed:

- 1) At approximately 09:25 P.M on August 9, 2025, The Maine State Police Major Crimes Unit-North was called to investigate the death of three-year-old Fiona Brown (DOB 09-08-2021) in the Town of Milford, Maine while in the care of her mother, Kelly Brown (DOB 03-29-1985). The death of three-year-old Fiona Brown was discovered by law enforcement without the assistance of Kelly Brown.

- 2) Kelly Brown acted recklessly while being aware of and consciously disregarding the substantial risk of injury or death that would occur when she left her three-year-old daughter, Fiona Brown alone, locked inside her parked 2017 Nissan Murano, with all the windows closed on an extremely hot August day when the temperature reached approximately 82 degrees and resulted in the death of Fiona Brown.
- 3) Kelly Brown's alternative explanation for abandoning her daughter and dog in the locked closed car on a hot August day contradicts the surveillance video and the observations of the law enforcement officers when she appeared on the scene and was later interviewed.
- 4) Finally, I further believe that Kelly Brown's conduct was a gross deviation from the standard of conduct that a reasonable and prudent person would observe in the same situation, as in the standard of care that would have prevented the unnecessary death of 3-year-old Fiona Brown from being left alone in an overheated, parked car.
- 5) After reviewing the available evidence, I believe that Kelly Brown, as the sole caretaker and person responsible for the welfare of three-year-old Fiona Brown, recklessly, or with criminal negligence, caused the death of another human being, being 3-year-old Fiona Brown at 12 Main Road, Town of Milford, County of Penobscot, State of Maine on August 9, 2025, in violation of **Maine Criminal Code Title 17-A M.R.S. §203(1)(A), Manslaughter.**

Dated: 8/11/25
Maine State Police- Det. Lawrence AndersonSTATE OF MAINE
NEWPORT, SS.Then personally appeared Det. Lawrence Anderson and made oath the foregoing statements are true to the best of his knowledge, information, and belief.Dated: 8-11-25
Notary / Judge / Justice of the PeaceFINDINGSOn the basis of this affidavit and materials incorporated herein I **find probable cause.**
M.R. CRIM. P. (5) (d) complied with.Dated: 8/11/25
Judge / Justice of the Peace

On the basis of this affidavit and materials incorporated herein, I **do not find probable cause**.
M.R. CRIM. P. (5) (d) complied with.

Dated: _____

Judge / Justice of the Peace