

CIRCUIT COURT OF [TYPE CO. NAME] COUNTY MISSOURI

STATE OF MISSOURI,)
)
) Plaintiff,)
)
 vs.) Case No.)
)
 [type defendant's name(s)])
 [type address])
 [type city, ST ZIP])
)
 Defendant.)

COMPLAINT

STATE OF MISSOURI)
) ss.
 COUNTY OF [TYPE CO. NAME])

I [type your name], being of lawful age and being duly sworn state the following:

1. I am, and have been at all times material herein, an employee of the [type county health dept. name], a contractor with the Missouri Department of Health and Senior Services.
2. On [type date of complaint], I received a complaint that [type defendant's name(s)] [was/were] [type complaint e.g. discharging sewage effluent from their property] at [type address, city, ST].
3. I investigated the complaint on [type date of investigation], and found it to be true.
4. I spoke with the [type defendant's name(s)] on [type date] regarding their sewage system.
5. I further investigated on [type date of investigation], and found that the nuisance remained.
6. Under the provisions of Section 701.037.1, RSMo, on [type date of NOV], I notified the [type defendant's surname(s)] of the complaint and investigation and issued a written violation notice requiring abatement.
7. The [type date of NOV], Notice of Violation contained a statement of remedial actions required within 30 days (hereinafter "Notice").
8. A complete and accurate copy of the Notice is attached hereto as Exhibit A and is incorporated herein by reference.
9. I further investigated on [type date of (very recent) last inspection], and found the [type defendant's surname(s)] have not abated the [type complaint e.g. discharge of sewage effluent] to date.
10. The [type defendant's surname(s)] have not completed the remedial actions set forth in the Notice.
11. Pursuant to the requirements of Sections 701.037.5, and/or 701.059.1, RSMo, the Missouri Department of Health and Senior Services requests that the County Prosecuting Attorney institute proceedings to compel the [type defendant's surname(s)] to:

- a) Fully comply with all requirements of Chapter 701, RSMo;
- b) Abate the [type complaint e.g. discharge of sewage effluent] from their property;
- c) Complete all required remedial actions set forth in the Notice; and
- d) Pay all administrative penalties assessed by the Missouri Department of Health and Senior Services under Section 701.037.4, RSMo.

Affiant further states that [he/she] has actual personal knowledge of the facts, matters and things above set out and is a competent witness thereto.

[type your name]
Environmental Public Health Specialist
Complainant

Subscribed and sworn to before me this ____ day of _____, 20____. I am commissioned as a notary public within the County of _____, State of Missouri, and my commission expires on _____.

NOTARY PUBLIC