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File Date: 10/20/2021 7:45 AM
Hillsborough Superior Court Southern District
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The State of New Hampshire
SUPERIOR COURT COMPLAINT

Case Number: 226-2021-CR-00944 **Charge ID:** 1916900C

☐ VIOLATION	MISDEMEANOR ☑ CLASS A ☐ CLASS B ☐ UNCLASSIFIED (non-person)
	FELONY ☐ CLASS A ☐ CLASS B ☐ SPECIAL ☐ UNCLASSIFIED (non-person)

You are to appear at the: **Hillsborough Superior Court Southern District**
address: **30 Spring Street Nashua NH 03061**
in: **Hillsborough County**
at: **11:00AM**
on: **October 20, 2021**

Under penalty of law to answer to a complaint charging you with the following offense:

THE UNDERSIGNED COMPLAINS THAT:

Last Name	First Name	Middle
Dauphinais	Danielle	

Address	City	State	Zip
7 Sunset Drive	Merrimack	NH	03054

Sex	Race	Height	Weight	Eye Color	Hair Color
Female	White	5'4"	130	Brown	Brown

DOB	License #:	OP License State
06/12/1986	0605086121	New Hampshire

☐ COMM. VEH. ☐ COMM. DR. LIC. ☐ HAZ. MAT. ☐ 16+ PASSENGER

AT: **7 Sunset Drive Merrimack, NH 03054**

☐ On or about ☑ Between **September 1, and October 14, 2021** in the above county and state, did commit the offense of:

RSA Name: **Endangering the Welfare of a Child or Incompetent**
Contrary to RSA: **639:3(1)**
Inchoate:

And the laws of New Hampshire for which the defendant should be held to answer, in that the defendant did:

knowingly endanger the welfare of E.L., a child under 18 years age, by purposely violating a duty of care by preventing child protective service workers from locating E.L. by encouraging another person to claim that E.L. was with her when he was not, said action occurring when Dauphinais asked Bruce Scherzer and then Tracy Lyn Dauphinais to tell child protective service workers that E.L. was with them when he was not.

☐ Additional allegations are attached.

against the peace and dignity of the State.

Date: **10/20/2021**

Prosecutor's Signature	NH Bar ID #	Printed Name	Prosecuting Attorney's Office
/s/ Susan G. Morrell	1802	Susan G. Morrell	NH Attorney General

Assistant Attorney General

NHJB-2486-S (12/01/2016)

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The State of New Hampshire
SUPERIOR COURT COMPLAINT

Case Number: 226-2021-CR-00944 **Charge ID:** 1916901C

☐ VIOLATION	MISDEMEANOR ☐ CLASS A ☐ CLASS B ☐ UNCLASSIFIED (non-person)
	FELONY ☐ CLASS A ☑ CLASS B ☐ SPECIAL ☐ UNCLASSIFIED (non-person)

You are to appear at the: **Hillsborough Superior Court Southern District**
address: **30 Spring Street Nashua NH 03061**
in: **Hillsborough County**
at: **11:00AM**
on: **October 20, 2021**

Under penalty of law to answer to a complaint charging you with the following offense:

THE UNDERSIGNED COMPLAINS THAT:

Last Name	First Name	Middle
Dauphinais	Danielle	

Address	City	State	Zip
7 Sunset Drive	Merrimack	NH	03054

Sex	Race	Height	Weight	Eye Color	Hair Color
Female	White	5'4"	130	Brown	Brown

DOB	License #:	OP License State
06/12/1986	0605086121	New Hampshire

☐ COMM. VEH. ☐ COMM. DR. LIC. ☐ HAZ. MAT. ☐ 16+ PASSENGER

AT: **7 Sunset Drive Merrimack, NH 03054**

☑ On or about ☐ Between **October 14, 2021** in the above county and state, did commit the offense of:

RSA Name: **Witness Tampering**
Contrary to RSA: **641:5**
Inchoate:

And the laws of New Hampshire for which the defendant should be held to answer, in that the defendant did:

believing an official proceeding or investigation was pending or about to be instituted into the status of children living in her home, knowingly attempt to induce or otherwise cause Bruce Scherzer to testify or inform falsely, and/or to withhold any testimony, information, document or thing, when she asked Bruce Scherzer to lie to a child protective services worker on her behalf and say E.L. was with him, when in fact he was not.

☐ Additional allegations are attached.

against the peace and dignity of the State.

Date: **10/20/2021**

Prosecutor's Signature	NH Bar ID #	Printed Name	Prosecuting Attorney's Office
/s/ Susan G.Morrell	1802	Susan G. Morrell	NH Attorney General

Assistant Attorney General

NHJB-2486-S (12/01/2016)

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The State of New Hampshire
SUPERIOR COURT COMPLAINT

Case Number: 226-2021-CR-00944 **Charge ID:** 1916902C

☐ VIOLATION	MISDEMEANOR ☐ CLASS A ☐ CLASS B ☐ UNCLASSIFIED (non-person)
	FELONY ☐ CLASS A ☑ CLASS B ☐ SPECIAL ☐ UNCLASSIFIED (non-person)

You are to appear at the: **Hillsborough Superior Court Southern District**
address: **30 Spring Street Nashua NH 03061**
in: **Hillsborough County**
at: **11:00AM**
on: **October 20, 2021**

Under penalty of law to answer to a complaint charging you with the following offense:

THE UNDERSIGNED COMPLAINS THAT:

Dauphinais	Danielle	
Last Name	First Name	Middle
7 Sunset Drive	Merrimack	NH 03054
Address	City	State Zip

Female	White	5'4"	130	Brown	Brown
Sex	Race	Height	Weight	Eye Color	Hair Color

06/12/1986	0605086121	New Hampshire
DOB	License #:	OP License State

☐ COMM. VEH. ☐ COMM. DR. LIC. ☐ HAZ. MAT. ☐ 16+ PASSENGER

AT: **7 Sunset Drive Merrimack, NH 03054**

☑ On or about ☐ Between **October 10, 2021** in the above county and state, did commit the offense of:

RSA Name: **Witness Tampering**
Contrary to RSA: **641:5**
Inchoate:

And the laws of New Hampshire for which the defendant should be held to answer, in that the defendant did:

believing an official proceeding or investigation was pending or about to be instituted into the status of children living in her home, knowingly attempt to induce or otherwise cause Joanne Stapf to testify or inform falsely, and/or to withhold any testimony, information, document or thing, when she asked Joanne Stapf not to talk to a child protective service worker about E.L.

☐ Additional allegations are attached.

against the peace and dignity of the State.

Date: **10/20/2021**

/s/ Susan G. Morrell	1802 Susan G. Morrell	NH Attorney General
Prosecutor's Signature	NH Bar ID # Printed Name	Prosecuting Attorney's Office

Assistant Attorney General

NHJB-2486-S (12/01/2016)

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The State of New Hampshire
SUPERIOR COURT COMPLAINT

Case Number: 226-2021-CR-00944 **Charge ID:** 1916903C

☐ VIOLATION	MISDEMEANOR ☐ CLASS A ☐ CLASS B ☐ UNCLASSIFIED (non-person)
	FELONY ☐ CLASS A ☑ CLASS B ☐ SPECIAL ☐ UNCLASSIFIED (non-person)

You are to appear at the: **Hillsborough Superior Court Southern District**
address: **30 Spring Street Nashua NH 03061**
in: **Hillsborough County**
at: **11:00AM**
on: **October 20, 2021**

Under penalty of law to answer to a complaint charging you with the following offense:

THE UNDERSIGNED COMPLAINS THAT:

Last Name	First Name	Middle
Dauphinais	Danielle	

Address	City	State	Zip
7 Sunset Drive	Merrimack	NH	03054

Sex	Race	Height	Weight	Eye Color	Hair Color
Female	White	5'4"	130	Brown	Brown

DOB	License #:	OP License State
06/12/1986	0605086121	New Hampshire

☐ COMM. VEH. ☐ COMM. DR. LIC. ☐ HAZ. MAT. ☐ 16+ PASSENGER

AT: **7 Sunset Drive Merrimack, NH 03054**

☑ On or about ☐ Between **October 14, 2021** in the above county and state, did commit the offense of:

RSA Name: **Witness Tampering**
Contrary to RSA: **641:5**
Inchoate:

And the laws of New Hampshire for which the defendant should be held to answer, in that the defendant did:

believing an official proceeding or investigation was pending or about to be instituted into the status of children living in her home, knowingly attempt to induce or otherwise cause Tracy Lyn Dauphinais to testify or inform falsely, and/or to withhold any testimony, information, document or thing, when she asked Tracy Lyn Dauphinais to lie to child protective service worker about E.L.

☐ Additional allegations are attached.

against the peace and dignity of the State.

Date: **10/20/2021**

Prosecutor's Signature	NH Bar ID #	Printed Name	Prosecuting Attorney's Office
/s/ Susan G. Morrell	1802	Susan G. Morrell	NH Attorney General

Assistant Attorney General

NHJB-2486-S (12/01/2016)

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The State of New Hampshire
SUPERIOR COURT COMPLAINT

Case Number: **226-2021-CR-00944** **Charge ID:** 1916899C

☐ VIOLATION	MISDEMEANOR ☑ CLASS A ☐ CLASS B ☐ UNCLASSIFIED (non-person)
	FELONY ☐ CLASS A ☐ CLASS B ☐ SPECIAL ☐ UNCLASSIFIED (non-person)

You are to appear at the: **Hillsborough Superior Court Southern District**
address: **30 Spring Street Nashua NH 03061**
in: **Hillsborough County**
at: **11:00AM**
on: **October 20, 2021**

Under penalty of law to answer to a complaint charging you with the following offense:

THE UNDERSIGNED COMPLAINS THAT:

Dauphinais — Last Name
Danielle — First Name
Middle

7 Sunset Drive — Address
Merrimack — City
NH — State
03054 — Zip

Female — Sex
White — Race
5'4" — Height
130 — Weight
Brown — Eye Color
Brown — Hair Color

06/12/1986 — DOB
0605086121 — License #:
New Hampshire — OP License State

☐ COMM. VEH. ☐ COMM. DR. LIC. ☐ HAZ. MAT. ☐ 16+ PASSENGER

AT: **7 Sunset Drive Merrimack, NH 03054**

☐ On or about ☑ Between **September 1, and October 14, 2021** in the above county and state, did commit the offense of:

RSA Name: **Endangering the Welfare of a Child or Incompetent**
Contrary to RSA: **639:3 (1)**
Inchoate:

And the laws of New Hampshire for which the defendant should be held to answer, in that the defendant did:

knowingly endanger the welfare of E.L., a child under 18 years age, by purposely violating a duty of care by preventing child protective service workers from locating E.L. by failing to report him missing.

☐ Additional allegations are attached.

against the peace and dignity of the State.

Date: **10/20/2021**

/s/ Susan G. Morrell — Prosecutor's Signature
1802 — NH Bar ID #
Susan G. Morrell — Printed Name
NH Attorney General — Prosecuting Attorney's Office

Assistant Attorney General

NHJB-2486-S (12/01/2016)