

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

UNITED STATES OF AMERICA : Crim. No. 3:18-mj-611(JAM)
 :
 v. :
 :
 TODD MILLER : July 29, 2021

MOTION TO DISMISS COMPLAINT

Pursuant to Rule 48(a), Fed. R. Crim. P., the Government respectfully moves the Court to dismiss the Complaint that was previously issued in this matter. The government makes this request based upon: (1) expert medical analyses and reports regarding the defendant's prior brain surgery and its continued neurological impacts, which cast doubt upon the requisite legal element of "intent" to commit the charged offense (of what turned out to be a false 911 call); and (2) the defendant having entered agreements both to make full financial restitution for the costs of the law enforcement response to the false 911 call, and to continue a thorough and necessary program of Cognitive Remediation to render any recurrence of such conduct most highly unlikely. Counsel for the defendant does not object to the Court granting this motion.

Respectfully submitted

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CERTIFICATE OF SERVICE

I hereby certify that on July 29, 2021, I filed a copy of foregoing pleading and caused copies of same to be served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System. Copies of the foregoing pleading have also been sent directly by e-mail to counsel for the defendant, Stacey Richman, Esq., at srichmanlaw@msn.com.



Assistant U.S. Attorney

Deadline