

STATE OF INDIANA )  
 ) SS:  
ST. JOSEPH COUNTY )

IN THE ST. JOSEPH SUPERIOR COURT

CAUSE NO. 71 D0 8-1307-FA-000017

STATE OF INDIANA )  
 )  
VS. )  
 )  
PURVI PATEL )  
DOB: XX-XX-1980 )

INFORMATION FOR NEGLECT OF A  
DEPENDENT, CLASS A FELONY

**FILED -**  
JUL 17 2013  
Clerk  
St. Joseph Superior Court

MICHAEL A.DVORAK, upon information and belief, affirms under the penalty of perjury that:

On or about the 13<sup>th</sup> day of July, 2013, in St. Joseph County, State of Indiana, PURVI PATEL, who is more than eighteen (18) years old, and having the care of a dependent, did knowingly place that dependent in a situation that endangered the dependent's life or health by failing to provide any medical care for that dependent immediately after the dependent's birth, resulting in the death of that dependent, who was less than fourteen (14) years old.

All of which is contrary to the form of the statute in such cases made and provided, to-wit: Indiana Code 35-46-1-4(b)(3), and against the peace and dignity of the State of Indiana.

I affirm under the penalties for perjury, that the foregoing representations are true.

*Michael A. Dvorak*  
MICHAEL A. DVORAK  
PROSECUTING ATTORNEY

Probable cause found. Arrest warrant ordered issued. Bond set at \$ 100,000

Corporate surety or \$ 10,000 cash in lieu thereof.

*Plus Defendant surrender passport via her counsel to Ellen Stolte, Probation and report daily to Ms. Stolte until 2 P.M. monitoring in place and not leave state of Indiana.*

*[Signature]*  
JUDGE, ST. JOSEPH SUPERIOR COURT

WITNESSES:

Det. Galen Pelletier, CMHU

Det. Brian Cook, CMHU

Det. Tom Cameron, CMHU

Det. Alex Arendt, CMHU

Det. Ken Cornelis, CMHU

Det. Tony Bontrager, CMHU

Det. James Taylor, CMHU

Det. James Andrews, CMHU

Dr. Kelly McGuire

Dr. Tracy Byrne

Medical personnel

Laboratory personnel

Dr. Joseph Prahlow

Telephone personnel

Responding Officers

Anyone else mentioned in the discovery,

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SUPPLEMENTAL AFFIDAVIT IN  
SUPPORT OF PROBABLE CAUSE

**FILED**

JUL 17 2013

St. Joseph  
Clerk  
Court

GALEN PELLETIER, upon information and belief, affirms under the penalty of perjury  
that:

I am a Police Officer with the South Bend Police Department and have been so employed  
for seventeen (17) years. Currently, I am assigned as an investigator with the County Metro  
Homicide Unit. I have been with the County Metro Homicide Unit for three (3) years. On July 13,  
2013, I was assigned to investigate a dead body located in a dumpster. I make this affidavit based  
upon my own personal observations and those of other law enforcement officers. All events  
occurred in St. Joseph County, Indiana.

On July 13, 2013, at approximately 9:24 p.m., PURVI PATEL presented to the emergency  
room at St. Joseph Hospital in Mishawaka, Indiana. PURVI PATEL was bleeding from her vaginal  
area. The emergency personnel believed that she had recently delivered a child. However, PURVI  
PATEL denied doing so. PURVI PATEL was transported to the Maternity Floor for further  
diagnosis and treatment.

Dr. Tracy Byrne, M.D., was the treating Obstetrician and examined PURVI PATEL. She  
found that PURVI PATEL was bleeding from her vaginal region and an umbilical cord was  
protruding. It was Dr. Byrne's opinion that PURVI PATEL had just delivered a child.

Dr. Byrne again advised PURVI PATEL that she had just delivered a baby. PURVI  
PATEL again denied that she had even been pregnant. Because PURVI PATEL was adamant that

she had not even been pregnant, Dr. Byrne requested a second (2<sup>nd</sup>) opinion. Dr. Kelly McGuire was brought in from his home and also examined PURVI PATEL. After his examination, Dr. McGuire was positive that PURVI PATEL had just delivered a child.

Concerned for the child's welfare, doctors continued to question PURVI PATEL of the whereabouts of the child. Eventually, PURVI PATEL told the medical staff that she had delivered a baby in her home in Granger, Indiana. She further told the medical staff that she did not see the child breathing or moving and believed it to be dead. PURVI PATEL told the medical staff that she put the dead body in a bag and placed it in a dumpster behind the Super Target. She further told medical personnel that she was roughly two (2) months along and had a miscarriage.

It was the doctors' professional opinion that Ms. Patel was much further along than two (2) months. Based upon their examination of PURVI PATEL, doctor's believed that she had been twenty eight (28) to thirty (30) weeks postfertilization.

Fearing for the child, Dr. McGuire then drove to the Super Target and began searching in the dumpsters. He also called the St. Joseph County Police, who joined in the search. After searching numerous dumpsters, officers located the body in a dumpster behind Moe's Southwest Grill. Dr. McGuire examined the body and determined that it was deceased. After examining the body, Dr. McGuire's opinion was that the child was pre-mature and roughly thirty (30) weeks from conception. His external examination noted no reason why the child would not have survived, but cautioned that it was based only upon an external examination.

The County Metro Homicide Unit was then activated.

On July 15, 2013, Forensic Pathologist, Dr. Joseph Prahlow began the autopsy and performed a physical examination of the body. He found that the body was 12.2" long and weighed 1.46 pounds. However, he noted the weight was not the weight at the time of birth because the body was emptied of much of the blood since the umbilical cord had not been closed or clamped.

He further determined that the child was pre-mature but at least twenty eight (28) weeks from conception. Dr. Prahlow further concluded that in his opinion, the child had been born alive and had taken a breath. Further testing and investigation are pending.

Officers secured a search warrant for the phone of PURVI PATEL. Det. Chad Goblen, a South Bend Police officer with extensive training in examining electronic devices, was able to download the text messages of PURVI PATEL. In reviewing those messages, officers discovered that PURVI PATEL discussed her pregnancy with at least one (1) friend.

In her text messages, officers found that on June 19, 2013, PURVI PATEL admitted to this friend that she was over sixty (60) days pregnant. PURVI PATEL also admitted that she had obtained two (2) drugs from Hong Kong, in an attempt to abort the child. PURVI PATEL told this friend that she began taking the drugs on July 10, 2013.

According to Dr. McGuire, one of those drugs that PURVI PATEL admitted taking would induce labor, thereby ending her pregnancy. The other drug was designed to end the life of a fetus, but only if it was within nine (9) weeks old. Dr. McGuire advised officers that this second drug would have no effect on a fetus that was twenty-eight (28) or more weeks along.

Dr. Prahlow was able to determine that the fetus was alive before PURVI PATEL began taking the drugs.

All the incidents herein happened in St. Joseph County, Indiana.

I affirm under the penalties for perjury, that the foregoing representations are true.

 #2012  
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GALEN PELLETIER  
DETECTIVE, COUNTY METRO HOMICIDE UNIT