

On January 5, 2006, the victim, [REDACTED] age 14, was committed to the custody of the Department of Juvenile Justice, and placed in the Bay County Boot Camp program in Bay County, Florida. On the morning of January 5, 2006, the victim underwent a physical assessment consisting of two minutes of push-ups, two minutes of sit-ups, and a run of approximately 1.5 miles. After completing approximately two-thirds of the run, the victim fell to the ground. This occurred at approximately 0909 hours. The victim was restrained by the guards at the boot camp, and was subjected to multiple uses of force, including take-downs, knee strikes to the legs, hammer strikes to the forearms, wrist compressions, and pressure point applications. Drill instructors at the boot camp forced the victim to inhale ammonia, and covered the victim's mouth while doing so. At least three separate episodes of forced ammonia inhalation occurred, two lasting over 50 seconds and one lasting in excess of five minutes. The victim became unresponsive during the last forced application of ammonia. An ambulance was called at 0931 hours. The defendant was transported by ambulance to Bay Medical Center, and was later transported to Sacred Heart Hospital in Pensacola. The victim was unable to be revived through emergency medical care. The victim was pronounced dead on January 6, 2006, at 0152 hours, at Sacred Heart Hospital.

Dr. Charles Siebert, the Medical Examiner for the 14th District, in Panama City, performed an autopsy on January 6, 2006. Dr. Siebert found that the victim died a natural death due to complications of sickle cell trait. A second autopsy has been performed by Dr. Vernard Adams, the Medical Examiner for the 13th District, in Tampa. Dr. Adams found that the victim died from suffocation due to occlusion of the mouth combined with forced inhalation of ammonia. The autopsies and medical evidence have been reviewed by other medical experts who have found that the victim's death was caused by oxygen deprivation.

The defendant and co-defendants were working at the Bay County Boot Camp on January 5, 2006. All defendants were caregivers for the victim and were responsible for his well being while he was in the custody of the Bay County Boot Camp. All defendants through culpable negligence failed to provide the victim with the care necessary to maintain the victim's physical and mental health, and failed to make reasonable efforts to protect the victim from abuse or neglect by other boot camp personnel. All defendants had contact with [REDACTED] between the time he fell at approximately 0909 hours and the time 911 was called at 0931 hours. All defendants were involved in the fatal incident by covering the victim's mouth and forcing inhalation of ammonia or assisting others in doing so. All defendants had the opportunity to protect the victim from prolonged oxygen deprivation and failed to do so. Through their culpable negligence, all defendants caused the death of [REDACTED].

The incident was captured and recorded on videotape. The defendant and co-defendants have admitted to their participation in the incident and can be identified on the videotape.

*[Handwritten signature]*  
Sworn before me on 11-28-06  
WIT [Signature]  
Circuit Judge

NITE 2 state his information to  
me @ same time.

IN THE CIRCUIT COURT, FOURTEENTH JUDICIAL CIRCUIT  
OF THE STATE OF FLORIDA, IN AND FOR BAY COUNTY

**STATE OF FLORIDA,**  
Plaintiff,

vs.

**Henry Dickens**  
Black/Male, DOB 10/27/46,  
SSN [REDACTED],  
Defendant,

**Charles Enfinger**  
White/Male, DOB 03/11/73,  
SSN [REDACTED],  
Defendant,

**SEALED**

Defendant,  
**Raymond Hauck**  
White/Male, DOB 06/15/58,  
SSN [REDACTED],  
Defendant,

**SEALED**

Defendant,  
**SEALED**

Defendant,  
**Kristin Schmidt**  
White/Female, DOB 09/19/53,  
SSN [REDACTED],  
Defendant,

**Joseph Walsh II**  
White/Male, 07/05/71,  
SSN [REDACTED],  
Defendant,

**INFORMATION CHARGING:**

Count I: Aggravated Manslaughter  
of a Person Under 18  
782.07(3) & 827.03(3)  
1<sup>st</sup> Degree Felony

Case No.: 06-4014 CFM  
GO

HAROLD BAZZEL  
CLERK OF CIRCUIT COURT  
BAY COUNTY, FLORIDA

2006 NOV 28 1 A 9 54

FILED

IN THE NAME AND BY AUTHORITY OF THE STATE OF FLORIDA:

Mark A. Ober, State Attorney for the Thirteenth Judicial Circuit of the State of Florida, assigned to discharge the duties of the State Attorney for the Fourteenth Judicial Circuit of the State of Florida pursuant to Executive Order 06-36 and Amended Executive Order 06-37, prosecuting for said State of Florida, in the name of and by the authority of the State of Florida, in the County of Bay, under oath, informs the Court that

Count I

Henry Dickens, Charles Enfinger, SEALED Raymond Hauck, SEALED  
SEALED, Kristin Schmidt, and Joseph Walsh II, on or about the 5<sup>th</sup> day of  
January, 2006, within the County of Bay and the State of Florida, being caregivers of  
[REDACTED] a person under the age of eighteen, did cause the death of [REDACTED]  
[REDACTED] by culpable negligence, without lawful justification or excuse, by  
neglecting [REDACTED] by failure or omission to provide [REDACTED]  
with the care, supervision or services necessary to maintain his physical or mental health  
that a prudent person would consider essential for the well-being of a child, or by failure  
to make a reasonable effort to protect [REDACTED] from abuse, neglect, or  
exploitation by another person, in violation of §782.07(3) and §827.03(3), Florida  
Statutes, contrary to the form of the statute in such cases made and provided, and against  
the peace and dignity of the State of Florida.

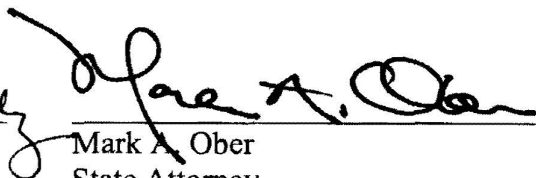
Mark A. Ober, State Attorney for the Thirteenth Judicial Circuit of the State of Florida, assigned to discharge the duties of the State Attorney for the Fourteenth Judicial Circuit of the State of Florida pursuant to Executive Order 06-36 and Amended Executive Order 06-37, under oath, states that the allegations set forth in the INFORMATION are based on facts that have been sworn to as true, under oath, by material witnesses, and which, if true, would constitute the offense(s) therein charged, and this INFORMATION is filed in good faith.

Sworn to and subscribed before me this 27<sup>th</sup>  
day of November, 2006, by Mark A. Ober,  
who is personally known to me.

  
Notary Public – State of Florida



Robin M. Menendez  
MY COMMISSION # DD245351 EXPIRES  
August 20, 2007  
BONDED THRU TROY FAIN INSURANCE, INC.

  
Mark A. Ober

State Attorney  
Florida Bar #230804  
800 E. Kennedy Blvd.  
Tampa, Florida 33602  
(813)272-5400  
Executive Assignment 06-36 &  
Amended Executive Assignment 06-37