

IN THE CIRCUIT COURT OF THE FOURTEEN JUDICIAL CIRCUIT
OF THE STATE OF FLORIDA IN AND FOR BAY COUNTY
CRIMINAL JUSTICE DIVISION

FILED

2007 MAR 20 A 10 40

HAROLD BAZZEL
CLERK OF CIRCUIT COURT
BAY COUNTY, FLORIDA

STATE OF FLORIDA

CASE NO.: 06-4016CF

v.

HENRY DICKENS
CHARLES ENFINGER

06-4016CFMA

06-4016CFMB

06-4016CFMC

RAYMOND HAUCK

06-4016CFMD

KRISTIN SCHMIDT
JOSEPH WALSH II

06-4016CFMF

06-4016CFMG

06-4016CFMH

STATEMENT OF PARTICULARS

THE STATE OF FLORIDA, by and through the undersigned Assistant State Attorney, hereby provides a Statement of Particulars in this cause. The State alleges that the manner in which the defendants did fail or omit 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, and the manner in which the defendants did fail to make a reasonable effort to protect [REDACTED] from abuse, neglect or exploitation by another person, are as follows:

As to Henry Dickens:

Henry Dickens did fail to allow [REDACTED] to recover from physical exertion.

Henry Dickens did fail to allow [REDACTED] to inhale sufficient oxygen.

Henry Dickens did assist Joseph Walsh II in depriving [REDACTED] of oxygen, by providing Joseph Walsh II with ammonia.

Henry Dickens did fail to protect [REDACTED] from being deprived oxygen by Joseph Walsh II, [REDACTED], Raymond Hauck and [REDACTED]

As to Charles Enfinger:

Charles Enfinger did fail to allow [REDACTED] to recover from physical exertion.

Charles Enfinger did fail to allow [REDACTED] to inhale sufficient oxygen.

Charles Enfinger did assist Joseph Walsh II, Patrick Garrett, Raymond Hauck and [REDACTED] in depriving [REDACTED] of oxygen, by restraining and applying force to [REDACTED]

Charles Enfinger did fail to protect [REDACTED] from being deprived oxygen by Joseph Walsh II, [REDACTED] Raymond Hauck and [REDACTED]

As to [REDACTED]

[REDACTED] did fail to allow [REDACTED] to recover from physical exertion.

[REDACTED] did fail to allow [REDACTED] to inhale sufficient oxygen.

[REDACTED] did assist Joseph Walsh II, Raymond Hauck and [REDACTED] in depriving [REDACTED] of oxygen, by restraining and applying force to [REDACTED]

[REDACTED] did deprive [REDACTED] of oxygen.

[REDACTED] did fail to protect [REDACTED] from being deprived oxygen by Joseph Walsh II, Raymond Hauck and [REDACTED]

As to Raymond Hauck:

Raymond Hauck did allow drill instructors to improperly apply ammonia on juveniles.

Raymond Hauck did fail to allow [REDACTED] to recover from physical exertion.

Raymond Hauck did fail to allow [REDACTED] to inhale sufficient oxygen.

Raymond Hauck did deprive [REDACTED] of oxygen.

Raymond Hauck did fail to protect [REDACTED] from being deprived oxygen by [REDACTED] and [REDACTED]

As to [REDACTED]

[REDACTED] did allow drill instructors to improperly apply ammonia on juveniles.

[REDACTED] did fail to allow [REDACTED] to recover from physical exertion.

[REDACTED] did fail to allow [REDACTED] to inhale sufficient oxygen.

[REDACTED] did fail to protect [REDACTED] from being deprived oxygen by Patrick Garrett and Raymond Hauck

[REDACTED] did deprive [REDACTED] of oxygen.

[REDACTED] did fail to provide medical personnel with information necessary to diagnose and treat [REDACTED].

As to [REDACTED]:

[REDACTED] did fail to allow [REDACTED] to recover from physical exertion.

[REDACTED] did fail to allow [REDACTED] to inhale sufficient oxygen.

[REDACTED] did assist Joseph Walsh II, [REDACTED] and Raymond Hauck in depriving [REDACTED] of oxygen, by restraining and applying force to [REDACTED]

[REDACTED] did fail to protect [REDACTED] from being deprived oxygen by Joseph Walsh II, [REDACTED] Raymond Hauck and [REDACTED]

As to Kristin Schmidt:

Kristin Schmidt did allow drill instructors to improperly apply ammonia on juveniles.

Kristin Schmidt did fail to allow [REDACTED] to recover from physical exertion.

Kristin Schmidt did fail to allow [REDACTED] to inhale sufficient oxygen.

Kristin Schmidt did fail to properly assess the physical and medical needs of [REDACTED]

Kristin Schmidt did assist Joseph Walsh II, [REDACTED], Raymond Hauck and [REDACTED] in depriving [REDACTED] of oxygen, by providing Joseph Walsh II, [REDACTED], Raymond Hauck and [REDACTED] with ammonia.

Kristin Schmidt did fail to properly monitor the physical and medical effects on [REDACTED] of exercise, deprivation of oxygen, and physical interaction with Joseph Walsh II, Charles Enfinger, [REDACTED], Henry Dickens, Raymond Hauck and [REDACTED]

Kristin Schmidt did fail to provide necessary medical care to [REDACTED]

Kristin Schmidt did fail to properly control and supervise the application of ammonia to [REDACTED], and did allow the improper application of ammonia to [REDACTED]

Kristin Schmidt did allow Joseph Walsh II, Patrick G. [REDACTED], Raymond Hauck and [REDACTED] to deprive [REDACTED] of oxygen.

Kristin Schmidt did fail to protect [REDACTED] from being deprived oxygen by Joseph Walsh II, [REDACTED], Raymond Hauck and [REDACTED]

Kristin Schmidt did fail to provide medical personnel with information necessary to diagnose and treat [REDACTED].

As to Joseph Walsh II:

Joseph Walsh II did fail to allow [REDACTED] to recover from physical exertion.

Joseph Walsh II did fail to allow [REDACTED] to inhale sufficient oxygen.

Joseph Walsh II did deprive [REDACTED] of oxygen.

Joseph Walsh II did assist [REDACTED], Raymond Hauck and [REDACTED] in depriving [REDACTED] of oxygen, by restraining and applying force to [REDACTED]

Joseph Walsh II did fail to protect [REDACTED] from being deprived oxygen by [REDACTED], Raymond Hauck and [REDACTED]