

NO. _____

THE STATE OF TEXAS

VS.

GEO GROUP, INCORPORATED, FORMERLY
WACKENHUT CORRECTIONS CORPORATION

INDICTMENT

OFFENSE:

MURDER
and
MANSLAUGHTER

JUAN ANGEL GUERRA
DISTRICT AND COUNTY ATTORNEY

A TRUE BILL:

John Rodriguez

Foreman of Grand Jury

File on _____ 2008

GILBERT LOZANO,
Clerk of the District Courts of
Willacy County, Texas

By: _____

Deputy

Amount of Bail _____

Bond set by Judge _____

10-23-08

3:30 PM



19.02 MURDER (b) (1) and (2)
19.03 (a) and (b) MANSLAUGHTER

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

THE GRAND JURY, for the County of Willacy, State of Texas, duly selected, empaneled, sworn, charged, and organized as such at the July Term, A.D., 2008, of the 197th Judicial District Court for said County, upon their oaths present in and to said Court at said term that GEO Group, Incorporated, formerly Wackenhut Corrections Corporation, hereinafter styled Defendant, on or about the 26TH day of April A. D., 2001, and before the presentment of this indictment, in the County and State aforesaid, during the incarceration of Gregorio De La Rosa, Jr., the victim, who at the time of his death, was an inmate at Defendant's facility, and Defendant, through its agents, did then and there intentionally or knowingly cause the death of Gregorio De La Rosa, Jr., an individual, by allowing one or more inmates to physically assault the victim and said inmates used or exhibited a deadly weapon, to wit, socks with padlocks inside, a deadly weapon or an instrument that by the manner of its use, was capable of causing death, inasmuch as it did cause the death of Gregorio De La Rosa, Jr.,

COUNT II

AND THE GRAND JURORS aforesaid, upon their oaths in said court, present that the Defendant, GEO Group, Incorporated, formerly Wackenhut Corrections Corporation, on or about the 26TH day of April, 2001, and before the presentment of this indictment, in the County and State aforesaid, while in the course of incarcerating Gregorio De La Rosa, Jr., the victim, did then and there, while committing a felony, to wit, aggravated assault, by and through its agents, and Defendant's agents intended to cause serious bodily injury and committed acts clearly dangerous to human life, to wit, by allowing one or more inmates to assault victim and said inmates used or exhibited a deadly weapon, a sock with padlocks inside, that by the manner of its use, was capable of causing death, inasmuch as it did cause the death of Gregorio De La Rosa, Jr., an individual,

COUNT III

AND THE GRAND JURORS aforesaid, upon their oaths in said court, present that the Defendant, GEO Group, Incorporated, formerly Wackenhut Corrections Corporation, on or about the 26TH day of April, 2001, and before the presentment of this indictment, in the County and State aforesaid, while in the course of incarcerating Gregorio De La Rosa, Jr., the victim, recklessly did

cause the death of Gregorio De La Rosa, Jr., an individual, by and through its agents, being high managerial agents, acting on behalf of said Defendant, a corporation, and were within the scope of his (their) office or employment, said agents, in violation of their duties imposed by law, allowed such acts and the commission of such of acts were authorized, requested, commanded, performed, or recklessly tolerated by said Defendant corporation in allowing one or more inmates to assault the victim, by using or exhibiting a deadly weapon, to wit, a sock with padlocks, that by the manner of its use, was capable of causing death inasmuch as it did cause the death of Gregorio De La Rosa Jr., an individual,

against the peace and dignity of the State.


Foreman of the Grand Jury