

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  
3:30pm  
^

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 197<sup>th</sup> 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 26<sup>TH</sup> 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 26<sup>TH</sup> 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 26<sup>TH</sup> 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