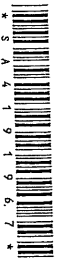


IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, STATE OF FLORIDA



STATE OF FLORIDA,
Plaintiff,

INFORMATION FOR:

1-9. AGGRAVATED MANSLAUGHTER OF
AN ELDERLY PERSON OR DISABLED
PERSON (1F) (L9)

vs.

10-13. TAMPERING WITH EVIDENCE(3F) (L1)

JORGE CARBALLO, (1-9)
SERGO COLIN, (1-9)
TAMIKA MILLER, (1-6, 10-11)
ALTHIA MEGGIE (1-2, 12-13)
Co-Defendants,

_____/

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

COUNT 1

AGGRAVATED MANSLAUGHTER
OF AN ELDERLY PERSON OR DISABLED ADULT

MICHAEL J. SATZ, State Attorney for the Seventeenth Judicial Circuit of Florida, as Prosecuting Attorney for the State of Florida, in the County of Broward, by and through his undersigned Assistant State Attorney, charges that on or about or between September 12, 2017 and September 13, 2017 **JORGE CARBALLO, SERGO COLIN, TAMIKA MILLER, and ALTHIA MEGGIE** did then and there, unlawfully and feloniously, commit aggravated manslaughter of an elderly person or disabled adult, by causing the death of **Betty Hibbard**, an elderly person or disabled adult, by culpable negligence under s. 825.102(3) in that **JORGE CARBALLO, SERGO COLIN, TAMIKA MILLER, and ALTHIA MEGGIE** did by culpable negligence, as a caregiver, neglect **Betty Hibbard**, an elderly person or disabled adult, in that **JORGE CARBALLO, SERGO COLIN, TAMIKA MILLER, and ALTHIA MEGGIE**

- a) failed or omitted to provide **Betty Hibbard** with the care, supervision, and services necessary to maintain **Betty Hibbard's** physical and mental health, including but not limited to, food, nutrition, clothing, shelter, supervision, medicine, and medical services that a prudent person would consider essential for the well-being of **Betty Hibbard**; or

- b) failed to make a reasonable effort to protect **Betty Hibbard** from abuse, neglect, or exploitation by another person

and in doing so caused the death of **Betty Hibbard**, an elderly person or disabled adult, who languished and died on September 13, 2017 by heatstroke due to environmental heat exposure, and **JORGE CARBALLO, SERGO COLIN, TAMIKA MILLER, and ALTHIA MEGGIE** did so without lawful justification and under circumstances in which such killing was not excusable homicide or murder, contrary to Florida Statutes Sections 777.011, 782.07(2) and 825.102(3) (L9), and

COUNT 2

AGGRAVATED MANSLAUGHTER

OF AN ELDERLY PERSON OR DISABLED ADULT

MICHAEL J. SATZ, State Attorney for the Seventeenth Judicial Circuit of Florida, as Prosecuting Attorney for the State of Florida, in the County of Broward, by and through his undersigned Assistant State Attorney, charges that on or about or between September 12, 2017 and September 13, 2017 **JORGE CARBALLO, SERGO COLIN, TAMIKA MILLER, and ALTHIA MEGGIE** did then and there, unlawfully and feloniously, commit aggravated manslaughter of an elderly person or disabled adult, by causing the death of **Carolyn Eatherly**, an elderly person or disabled adult, by culpable negligence under s. 825.102(3) in that **JORGE CARBALLO, SERGO COLIN, TAMIKA MILLER, and ALTHIA MEGGIE** did by culpable negligence, as a caregiver, neglect **Carolyn Eatherly**, an elderly person or disabled adult, in that **JORGE CARBALLO, SERGO COLIN, TAMIKA MILLER, and ALTHIA MEGGIE**

- a) failed or omitted to provide **Carolyn Eatherly** with the care, supervision, and services necessary to maintain **Carolyn Eatherly's** physical and mental health, including but not limited to, food, nutrition, clothing, shelter, supervision, medicine, and medical services that a prudent person would consider essential for the well-being of **Carolyn Eatherly**;
or
- b) failed to make a reasonable effort to protect **Carolyn Eatherly** from abuse, neglect, or exploitation by another person

and in doing so caused the death of **Carolyn Eatherly**, an elderly person or disabled adult, who languished and died on September 13, 2017 by heatstroke due to environmental heat exposure, and

JORGE CARBALLO, SERGO COLIN, TAMIKA MILLER, and ALTHIA MEGGIE did so without lawful justification and under circumstances in which such killing was not excusable homicide or murder, contrary to Florida Statutes Sections 777.011, 782.07(2) and 825.102(3) (L9), and

COUNT 3

AGGRAVATED MANSLAUGHTER

OF AN ELDERLY PERSON OR DISABLED ADULT

MICHAEL J. SATZ, State Attorney for the Seventeenth Judicial Circuit of Florida, as Prosecuting Attorney for the State of Florida, in the County of Broward, by and through his undersigned Assistant State Attorney, charges that on or about or between September 12, 2017 and September 13, 2017 **JORGE CARBALLO, SERGO COLIN, and TAMIKA MILLER** did then and there, unlawfully and feloniously, commit aggravated manslaughter of an elderly person or disabled adult, by causing the death of **Manuel Mendieta**, an elderly person or disabled adult, by culpable negligence under s. 825.102(3) in that **JORGE CARBALLO, SERGO COLIN, and TAMIKA MILLER** did by culpable negligence, as a caregiver, neglect **Manuel Mendieta**, an elderly person or disabled adult, in that **JORGE CARBALLO, SERGO COLIN, and TAMIKA MILLER**

- a) failed or omitted to provide **Manuel Mendieta** with the care, supervision, and services necessary to maintain **Manuel Mendieta's** physical and mental health, including but not limited to, food, nutrition, clothing, shelter, supervision, medicine, and medical services that a prudent person would consider essential for the well-being of **Manuel Mendieta**;
or
- b) failed to make a reasonable effort to protect **Manuel Mendieta** from abuse, neglect, or exploitation by another person

and in doing so caused the death of **Manuel Mendieta**, an elderly person or disabled adult, who languished and died on or about September 13, 2017 due to environmental heat exposure, and **JORGE CARBALLO, SERGO COLIN, and TAMIKA MILLER** did so without lawful justification and under circumstances in which such killing was not excusable homicide or murder, contrary to Florida Statutes Sections 777.011, 782.07(2) and 825.102(3) (L9), and

COUNT 4
AGGRAVATED MANSLAUGHTER
OF AN ELDERLY PERSON OR DISABLED ADULT

MICHAEL J. SATZ, State Attorney for the Seventeenth Judicial Circuit of Florida, as Prosecuting Attorney for the State of Florida, in the County of Broward, by and through his undersigned Assistant State Attorney, charges that on or about or between September 12, 2017 and September 13, 2017 **JORGE CARBALLO, SERGO COLIN, and TAMIKA MILLER** did then and there, unlawfully and feloniously, commit aggravated manslaughter of an elderly person or disabled adult, by causing the death of **Bobby Owens**, an elderly person or disabled adult, by culpable negligence under s. 825.102(3) in that **JORGE CARBALLO, SERGO COLIN, and TAMIKA MILLER** did by culpable negligence, as a caregiver, neglect **Bobby Owens**, an elderly person or disabled adult, in that **JORGE CARBALLO, SERGO COLIN, and TAMIKA MILLER**

- c) failed or omitted to provide **Bobby Owens** with the care, supervision, and services necessary to maintain **Bobby Owens's** physical and mental health, including but not limited to, food, nutrition, clothing, shelter, supervision, medicine, and medical services that a prudent person would consider essential for the well-being of **Bobby Owens**; or
- d) failed to make a reasonable effort to protect **Bobby Owens** from abuse, neglect, or exploitation by another person

and in doing so caused the death of **Bobby Owens**, an elderly person or disabled adult, who languished and died on or about September 13, 2017 due to environmental heat exposure, and **JORGE CARBALLO, SERGO COLIN, and TAMIKA MILLER** did so without lawful justification and under circumstances in which such killing was not excusable homicide or murder, contrary to Florida Statutes Sections 777.011, 782.07(2) and 825.102(3) (L9), and

COUNT 5
AGGRAVATED MANSLAUGHTER
OF AN ELDERLY PERSON OR DISABLED ADULT

MICHAEL J. SATZ, State Attorney for the Seventeenth Judicial Circuit of Florida, as Prosecuting Attorney for the State of Florida, in the County of Broward, by and through his undersigned Assistant State Attorney, charges that on or about or between September 12, 2017 and

September 13, 2017 **JORGE CARBALLO, SERGO COLIN, and TAMIKA MILLER** did then and there, unlawfully and feloniously, commit aggravated manslaughter of an elderly person or disabled adult, by causing the death of **Gail Nova**, an elderly person or disabled adult, by culpable negligence under s. 825.102(3) in that **JORGE CARBALLO, SERGO COLIN, and TAMIKA MILLER** did by culpable negligence, as a caregiver, neglect **Gail Nova**, an elderly person or disabled adult, in that **JORGE CARBALLO, SERGO COLIN, and TAMIKA MILLER**

- e) failed or omitted to provide **Gail Nova** with the care, supervision, and services necessary to maintain **Gail Nova's** physical and mental health, including but not limited to, food, nutrition, clothing, shelter, supervision, medicine, and medical services that a prudent person would consider essential for the well-being of **Gail Nova**; or
- f) failed to make a reasonable effort to protect **Gail Nova** from abuse, neglect, or exploitation by another person

and in doing so caused the death of **Gail Nova**, an elderly person or disabled adult, who languished and died on or about September 13, 2017 by heatstroke due to environmental heat exposure, and **JORGE CARBALLO, SERGO COLIN, and TAMIKA MILLER** did so without lawful justification and under circumstances in which such killing was not excusable homicide or murder, contrary to Florida Statutes Sections 777.011, 782.07(2) and 825.102(3) (L9), and

COUNT 6

AGGRAVATED MANSLAUGHTER

OF AN ELDERLY PERSON OR DISABLED ADULT

MICHAEL J. SATZ, State Attorney for the Seventeenth Judicial Circuit of Florida, as Prosecuting Attorney for the State of Florida, in the County of Broward, by and through his undersigned Assistant State Attorney, charges that on or about or between September 12, 2017 and September 13, 2017 **JORGE CARBALLO, SERGO COLIN, and TAMIKA MILLER** did then and there, unlawfully and feloniously, commit aggravated manslaughter of an elderly person or disabled adult, by causing the death of **Miguel Franco**, an elderly person or disabled adult, by culpable negligence under s. 825.102(3) in that **JORGE CARBALLO, SERGO COLIN, and TAMIKA MILLER** did by culpable negligence, as a caregiver, neglect **Miguel Franco**, an elderly person or disabled adult, in that **JORGE CARBALLO, SERGO COLIN, and TAMIKA MILLER**

- g) failed or omitted to provide **Miguel Franco** with the care, supervision, and services necessary to maintain **Miguel Franco's** physical and mental health, including but not limited to, food, nutrition, clothing, shelter, supervision, medicine, and medical services that a prudent person would consider essential for the well-being of **Miguel Franco**; or
- h) failed to make a reasonable effort to protect **Miguel Franco** from abuse, neglect, or exploitation by another person

and in doing so caused the death of **Miguel Franco**, an elderly person or disabled adult, who languished and died on or about September 13, 2017 due to environmental heat exposure, and **JORGE CARBALLO, SERGO COLIN, and TAMIKA MILLER** did so without lawful justification and under circumstances in which such killing was not excusable homicide or murder, contrary to Florida Statutes Sections 777.011, 782.07(2) and 825.102(3) (L9), and

COUNT 7

AGGRAVATED MANSLAUGHTER

OF AN ELDERLY PERSON OR DISABLED ADULT

MICHAEL J. SATZ, State Attorney for the Seventeenth Judicial Circuit of Florida, as Prosecuting Attorney for the State of Florida, in the County of Broward, by and through his undersigned Assistant State Attorney, charges that on or about or between September 12, 2017 and September 13, 2017 **JORGE CARBALLO and SERGO COLIN** did then and there, unlawfully and feloniously, commit aggravated manslaughter of an elderly person or disabled adult, by causing the death of **Estella Hendricks**, an elderly person or disabled adult, by culpable negligence under s. 825.102(3) in that **JORGE CARBALLO and SERGO COLIN** did by culpable negligence, as a caregiver, neglect **Estella Hendricks**, an elderly person or disabled adult, in that **JORGE CARBALLO and SERGO COLIN**

- i) failed or omitted to provide **Estella Hendricks** with the care, supervision, and services necessary to maintain **Estella Hendricks's** physical and mental health, including but not limited to, food, nutrition, clothing, shelter, supervision, medicine, and medical services that a prudent person would consider essential for the well-being of **Estella Hendricks**; or
- j) failed to make a reasonable effort to protect **Estella Hendricks** from abuse, neglect, or exploitation by another person

and in doing so caused the death of **Estella Hendricks**, an elderly person or disabled adult, who languished and died on or about September 13, 2017 by heatstroke due to environmental heat exposure, and **JORGE CARBALLO**, and **SERGO COLIN** did so without lawful justification and under circumstances in which such killing was not excusable homicide or murder, contrary to Florida Statutes Sections 777.011, 782.07(2) and 825.102(3) (L9), and

COUNT 8

AGGRAVATED MANSLAUGHTER

OF AN ELDERLY PERSON OR DISABLED ADULT

MICHAEL J. SATZ, State Attorney for the Seventeenth Judicial Circuit of Florida, as Prosecuting Attorney for the State of Florida, in the County of Broward, by and through his undersigned Assistant State Attorney, charges that on or about or between September 12, 2017 and September 28, 2017 **JORGE CARBALLO** and **SERGO COLIN** did then and there, unlawfully and feloniously, commit aggravated manslaughter of an elderly person or disabled adult, by causing the death of **Dolores Biamonte**, an elderly person or disabled adult, by culpable negligence under s. 825.102(3) in that **JORGE CARBALLO** and **SERGO COLIN** did by culpable negligence, as a caregiver, neglect **Dolores Biamonte**, an elderly person or disabled adult, in that **JORGE CARBALLO** and **SERGO COLIN**

- k) failed or omitted to provide **Dolores Biamonte** with the care, supervision, and services necessary to maintain **Dolores Biamonte's** physical and mental health, including but not limited to, food, nutrition, clothing, shelter, supervision, medicine, and medical services that a prudent person would consider essential for the well-being of **Dolores Biamonte**; or
- l) failed to make a reasonable effort to protect **Dolores Biamonte** from abuse, neglect, or exploitation by another person

and in doing so caused the death of **Dolores Biamonte**, an elderly person or disabled adult, who languished and died on or about September 28, 2017 by adult failure to thrive due to complications of neuronal ceroid lipofuscinosis complicated by environmental heat exposure, and **JORGE CARBALLO** and **SERGO COLIN** did so without lawful justification and under circumstances in which such killing was not excusable homicide or murder, contrary to Florida Statutes Sections 777.011, 782.07(2) and 825.102(3) (L9), and

COUNT 9
AGGRAVATED MANSLAUGHTER
OF AN ELDERLY PERSON OR DISABLED ADULT

MICHAEL J. SATZ, State Attorney for the Seventeenth Judicial Circuit of Florida, as Prosecuting Attorney for the State of Florida, in the County of Broward, by and through his undersigned Assistant State Attorney, charges that on or about or between September 12, 2017 and September 19, 2017 **JORGE CARBALLO and SERGO COLIN** did then and there, unlawfully and feloniously, commit aggravated manslaughter of an elderly person or disabled adult, by causing the death of **Carlos Canal**, an elderly person or disabled adult, by culpable negligence under s. 825.102(3) in that **JORGE CARBALLO and SERGO COLIN** did by culpable negligence, as a caregiver, neglect **Carlos Canal**, an elderly person or disabled adult, in that **JORGE CARBALLO and SERGO COLIN**

- m) failed or omitted to provide **Carlos Canal** with the care, supervision, and services necessary to maintain **Carlos Canal's** physical and mental health, including but not limited to, food, nutrition, clothing, shelter, supervision, medicine, and medical services that a prudent person would consider essential for the well-being of **Carlos Canal**; or
- n) failed to make a reasonable effort to protect **Carlos Canal** from abuse, neglect, or exploitation by another person

and in doing so caused the death of **Carlos Canal**, an elderly person or disabled adult, who languished and died on or about September 19, 2017 by complications of environmental heat exposure and atherosclerotic and hypertensive cardiovascular disease, and **JORGE CARBALLO and SERGO COLIN** did so without lawful justification and under circumstances in which such killing was not excusable homicide or murder, contrary to Florida Statutes Sections 777.011, 782.07(2) and 825.102(3) (L9), and

COUNT 10
TAMPERING WITH OR FABRICATING PHYSICAL EVIDENCE

MICHAEL J. SATZ, State Attorney for the Seventeenth Judicial Circuit of Florida as Prosecuting Attorney for the State of Florida, in the County of Broward, by and through his undersigned Assistant State Attorney, charges that on or about September 14, 2017, in the County

and State aforesaid, **TAMIKA MILLER** did then and there knowing that a criminal trial or proceeding or an investigation by a duly constituted prosecuting authority, law enforcement agency, grand jury or legislative committee of this state was pending or was about to be instituted, to wit: the Hollywood Police Department's investigation of the deaths at the Rehabilitation Center at Hollywood Hills; did make, present, or use any record, document, or thing, knowing it to be false to-wit:

- a) the 7:42 pm, September 14, 2017 late entry progress note on the medical records of **Manuel Mendieta** describing the September 13, 2017 activity:

"Patient received at 11:15 p.m resting in bed,no distress noted. respiration even and non labored. blood pressure within normal limits , afebrile. Remains in stable condition.", and/or

- b) the 7:54 pm, September 14, 2017 late entry progress note on the medical records of **Betty Hibbard** describing the September 13, 2017 activity:

"approximately 4:00 p.m patient noted cardiac arrests with shallow breathing BP: 90/56,RR:15,P:52, Non rebreather applied ,heart rate ceased CPR initiated 911 called rescue arrived pronounced resident death.",

contrary to Florida Statutes Sections 918.13(1)(a) and 918.13(2), (L1), and

COUNT 11

TAMPERING WITH OR FABRICATING PHYSICAL EVIDENCE

MICHAEL J. SATZ, State Attorney for the Seventeenth Judicial Circuit of Florida as Prosecuting Attorney for the State of Florida, in the County of Broward, by and through his undersigned Assistant State Attorney, charges that on or about September 14, 2017, in the County and State aforesaid, **TAMIKA MILLER** did then and there knowing that a criminal trial or proceeding or an investigation by a duly constituted prosecuting authority, law enforcement agency, grand jury or legislative committee of this state was pending or was about to be instituted, to wit: the Hollywood Police Department's investigation of the deaths at the Rehabilitation Center at Hollywood Hills; did make, present, or use any record, document, or thing, knowing it to be false to-wit:

- a) the 8:18 pm, September 14, 2017 late entry progress note on the medical records of **Bobby Owens** describing the September 13, 2017 activity:

“Resident received at 11:15 resting bed Respiration even, unlabored. Peg tube intact. Vital signs taken, Safety and comfort provided. Call light within reach.”

contrary to Florida Statutes Sections 918.13(1)(a) and 918.13(2), (L1), and

COUNT 12

TAMPERING WITH OR FABRICATING PHYSICAL EVIDENCE

MICHAEL J. SATZ, State Attorney for the Seventeenth Judicial Circuit of Florida as Prosecuting Attorney for the State of Florida, in the County of Broward, by and through his undersigned Assistant State Attorney, charges that on or about September 14, 2017, in the County and State aforesaid, **ALTHIA MEGGIE** did then and there knowing that a criminal trial or proceeding or an investigation by a duly constituted prosecuting authority, law enforcement agency, grand jury or legislative committee of this state was pending or was about to be instituted, to wit: the Hollywood Police Department’s investigation of the deaths at the Rehabilitation Center at Hollywood Hills; did make, present, or use any record, document, or thing, knowing it to be false to-wit:

- a) the 7:43 pm, September 14, 2017 late entry progress note on the medical records of **Betty Hibbard** describing the September 13, 2017 activity:

“Reported on duty at 7pm. Observed resident Betty Hibbard sitting up in bed, in the hallway with O2 continuous oxygen in stable condition with portable air condition on. Resident displayed no signs of respiratory distress, or A-febrile. Resident is alert and oriented x 3. RR (respiratory rate) even and unlabored. Vital signs assess and **stable**. Fluids offered and tolerated well. No c/o (complaints of) pain voiced. Resident remains in the hallway by the nurses station with routine monitoring.”, and/or

- b) the 8:17 pm, September 14, 2017 late entry progress note on the medical records of **Betty Hibbard** describing the September 13, 2017 activity:

"At around about 3am Resident observed in respiratory distress. Assessment reveal and vitals BP 128/68, P 120, O2 sat on room air 80% with 15 liters via non breather

mask, O2 sat increase to 92% lungs sound with rhonchi, blood sugar 198. Iv heparin started with 22 gauge. given. New orders received to transfer resident to Memorial Hospital for respiratory for evaluation. Resident left via fire rescue in stable condition. MD made aware and call family member no answer left a message via voice mail.",

contrary to Florida Statutes Sections 918.13(1)(a) and 918.13(2), (L1), and

COUNT 13

TAMPERING WITH OR FABRICATING PHYSICAL EVIDENCE

MICHAEL J. SATZ, State Attorney for the Seventeenth Judicial Circuit of Florida as Prosecuting Attorney for the State of Florida, in the County of Broward, by and through his undersigned Assistant State Attorney, charges that on or about September 14, 2017, in the County and State aforesaid, **ALTHIA MEGGIE** did then and there knowing that a criminal trial or proceeding or an investigation by a duly constituted prosecuting authority, law enforcement agency, grand jury or legislative committee of this state was pending or was about to be instituted, to wit: the Hollywood Police Department's investigation of the deaths at the Rehabilitation Center at Hollywood Hills; did make, present, or use any record, document, or thing, knowing it to be false to-wit:

- a) the 8:05 pm, September 14, 2017 late entry progress note on the medical records of **Carolyn Eatherly** describing the September 13, 2017 activity:

"Reported on duty at 7pm observe resident Carolyn Eatherly sitting in her wheelchair, in the hallway in stable condition with portable air condition on. Resident displayed no signs of respiratory distress, Reported that resident had a temp 99.9 and PA ordered labs work and Tylenol for elevated temp around 8pm. Tylenol given as ordered."

contrary to Florida Statutes Sections 918.13(1)(a) and 918.13(2), (L1).

vs.

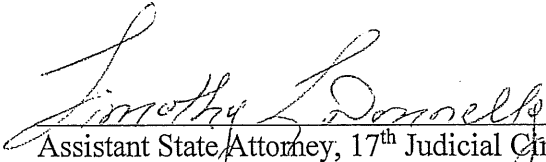
IDENTIFYING INFORMATION

JORGE CARBALLO,
SERGO COLIN,
TAMIKA MILLER,
ALTHIA MEGGIE

W/M – D.O.B. 12/12/1957
B/M – D.O.B. 02/06/1974
B/F – D.O.B. 11/16/1982
B/F – D.O.B. 12/08/1987

COUNTY OF BROWARD
STATE OF FLORIDA

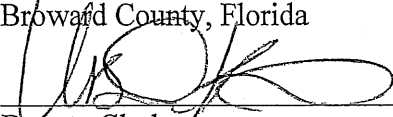
Personally appeared before me TIMOTHY L. DONNELLY, duly appointed as an Assistant State Attorney of the 17th Judicial Circuit of Florida by MICHAEL J. SATZ, State Attorney of said Circuit and Prosecuting Attorney for the State of Florida in the County of Broward, who being first duly sworn, certifies and says that the testimony has been received under oath from the material witness or witnesses for the offense(s), and the allegations as set forth in the foregoing Information would constitute the offense(s) charged, and that this prosecution is instituted in good faith.


Assistant State Attorney, 17th Judicial Circuit

SWORN TO AND SUBSCRIBED before me this 16th day of September, A.D. 2019.

BRENDA D. FORMAN
Clerk of the Circuit Court,
17th Judicial Circuit,
Broward County, Florida

BY:


Deputy Clerk

To the within Information, Defendant pleaded _____

BRENDA D. FORMAN
Clerk of the Circuit Court,
17th Judicial Circuit,
Broward County, Florida

BY: _____