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

2007 SEP 25 P 2551

STATE OF FLORIDA

vs.

CASE NO.: 06-4016CF HAROLD BAZZEL CLERK CIRCUIT COURT BAY COUNTY FLORIDA

HENRY DICKENS CHARLES ENFINGER

RAYMOND HAUCK

HENRY MCFADDEN, JR. KRISTIN SCHMIDT JOSEPH WALSH II 06-4016CFMA 06-4016CFMB 06-4016CFMD 06-4016CFMF 06-4016CFMG 06-4016CFMH

ÿ

JOINT STIPULATION OF FACTS

The State of Florida and Henry Dickens, Charles Enfinger, Patrick Garrett, Raymond Hauck, Charles Helms, Jr., Henry McFadden, Jr., Kristin Schmidt and Joseph Walsh II, stipulate to the following:

- 1. Henry McFadden, Jr., is also known as Ray McFadden, Jr.
- 2. Joseph Walsh II is also known as Joe Walsh.
- 3. Henry Dickens, Charles Enfinger, Patrick Garrett, Raymond Hauck,

Henry McFadden, Jr., Kristin Schmidt and Joseph Walsh II, were caregivers for Martin Lee Anderson.

4. The Bay Boot Camp was a juvenile commitment program for the Department of Juvenile Justice. The Bay County Sheriff's Office contracted with the Department of Juvenile Justice to provide the Bay Boot Camp as a commitment program for the Department of Juvenile Justice. The Bay Boot Camp was staffed and operated by the Bay County Sheriff's Office.

1

- The defendants were employees of the Bay County Sheriff's Office and worked at the Bay Boot Camp.
- Martin Lee Anderson was committed to the custody of the Department of Juvenile Justice on November 3, 2005.
- The Department of Juvenile Justice placed Martin Lee Anderson in the Bay Boot Camp. Martin Lee Anderson began the Bay Boot Camp program on January 5, 2006.
- 8. The defendants did not know that Martin Lee Anderson had sickle cell trait.

The undersigned counsel for the State of Florida and counsel for defendants Henry Dickens, Charles Enfinger, Patrick Garrett, Raymond Hauck, Charles Helms Tr., Henry McFadden, Jr., Kristin Schmidt and Joseph Walsh II, have agreed or an and F entered into the foregoing stipulations.

ma Michael C. Sinacore

Assistant State Attorney

MV

Hoot Crawford Attorney for Henry Dickens

Auct

Walter B. Smith Attorney for Charles Enfinger

Robert Sombathy Attorney for Patrick Garrett

nes H. White,

Attorney for Raymond Hauck



Jonathan Dingus Attorney for Henry McFadden, Jr.

Ashley Benedik Attorney for Kristin Schmidt

Robert Pell,

Attorney for Joseph Walsh II

Stipulations entered and filed with the court in Bay County, Florida, on this 25^{H} day of September, 2007.

2001 SEP 25 P 2: 20 FILED