

NO. _____

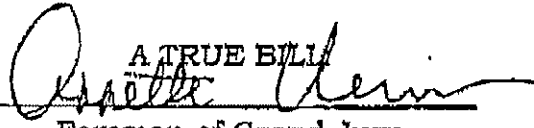
THE STATE OF TEXAS
VS.
GUSTAVO GARZA

INDICTMENT

OFFENSE:

OFFICIAL ABUSE OF OFFICIAL CAPACITY
AND
OFFICIAL OPPRESSION

JUAN ANGEL GUERRA
DISTRICT AND COUNTY ATTORNEY

A TRUE BILL

Foreman of Grand Jury

Filed on _____ 2008

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

By: _____
Deputy

Amount of Bail _____

Bond set by Judge _____

39.02 OFFICIAL ABUSE OF OFFICIAL CAPACITY

39.03 OFFICIAL OPPRESSION

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 2008, A.D. of the 197th Judicial District Court for said County, upon their oaths present in and to said court at said term that GUSTAVO GARZA hereinafter styled Defendant, on or about the 11th day of February 2007, A.D., being the special prosecutor, in and for the County of Willacy, State of Texas, for the 197th Judicial District, did then and there intended to harm the duly elected District Attorney of Willacy County, Texas being the Hon. Juan Angel Guerra, Defendant intentionally or knowingly violated a law relating to the Defendant's office or employment position as a public servant namely, violated Article 2.01 of the Texas Code of Criminal Procedure, and said law relating to Defendant's office, by imposing his primary duty as a special prosecutor to convict and not to see that justice was done and in doing so had the Hon. Juan Angel Guerra arrested by using facts that did not support the charges and said facts indicated a lack of merit to the charges,

COUNT II

AND THE GRAND JURORS aforesaid, upon their oaths in said court present that GUSTAVO GARZA hereinafter styled Defendant, on or about the 11th day of February 2007 A. D., did then and there intentionally subject the Hon. Juan Angel Guerra to an arrest and detention that the Defendant knew was unlawful, and the Defendant was then and there acting under color of his office as a public servant, namely, special prosecutor for the County of Willacy, State of Texas,

COUNT III

AND THE GRAND JURORS aforesaid, upon their oaths in said court present that GUSTAVO GARZA hereinafter styled Defendant, on or about the 21st day of March 2007, A.D., being the special prosecutor, in and for the County of Willacy, State of Texas, for the 197th Judicial District, did then and there intended to harm the duly elected District Attorney of Willacy County, Texas being the Hon. Juan Angel Guerra, Defendant intentionally or knowingly violated a law relating to the Defendant's office or employment position as a

public servant namely, violated Article 2.01 of the Texas Code of Criminal Procedure, and said law relating to Defendant's office, by imposing his primary duty as a special prosecutor to convict and not to see that justice was done and in doing so had the Hon. Juan Angel Guerra indicted by using underlying facts that Defendant knew or should have known did not support the allegations in the indictment and said facts indicated a lack of merit to the charges,

COUNT IV

AND THE GRAND JURORS aforesaid, upon their oaths in said court present that GUSTAVO GARZA hereinafter styled Defendant, on or about the 21st day of March 2007 A. D., did then and there intentionally subject the Hon. Juan Angel Guerra to an arrest and detention that the Defendant knew was unlawful, and the Defendant was then and there acting under color of his office as a public servant, namely, special prosecutor for the County of Willacy, State of Texas,

COUNT V

AND THE GRAND JURORS aforesaid, upon their oaths in said court present that GUSTAVO GARZA hereinafter styled Defendant, on or about the 10th day of February 2007 A. D., did then and there intentionally subject the Hon. Juan Angel Guerra to search or seizure of the Willacy County District Attorney's Office that Defendant knew was unlawful and Defendant was then and there acting under color of his office as a public servant namely, special prosecutor for the Willacy County, Texas, executed a search warrant on Willacy County District Attorney's Office that the Defendant knew or should have known that the judge that issued said warrant had no jurisdiction to issue said warrant,

against the peace and dignity of the State.


Foreman of the Grand Jury

NO. _____


THE STATE OF TEXAS
VS.
MERVYN MOSBACKER, JR.

INDICTMENT

OFFENSE:

OFFICIAL ABUSE OF OFFICIAL CAPACITY
AND
OFFICIAL OPPRESSION

JUAN ANGEL GUERRA
DISTRICT AND COUNTY ATTORNEY


A TRUE BILL
Foreman of Grand Jury

Filed on _____ 2008

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

By: _____

Deputy

Amount of Bail _____

Bond set by Judge _____

39.02 OFFICIAL ABUSE OF OFFICIAL CAPACITY
39.03 OFFICIAL OPPRESSION

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 2008, A.D. of the 197th Judicial District Court for said County, upon their oaths present in and to said court at said term that MERVYN MOSBACKER, JR. hereinafter styled Defendant, on or about the 21st day of March 2007, A.D., being the special prosecutor, in and for the County of Willacy, State of Texas, for the 197th Judicial District, did then and there intended to harm the duly elected District Attorney of Willacy County, Texas being the Hon. Juan Angel Guerra, Defendant intentionally or knowingly violated a law relating to the Defendant's office or employment position as a public servant namely, violated Article 2.01 of the Texas Code of Criminal Procedure, and said law relating to Defendant's office, by imposing his primary duty as a special prosecutor to convict and not to see that justice was done and in doing so had the Hon. Juan Angel Guerra indicted by using underlying facts that Defendant knew or should have known did not support the allegations in the indictment and said facts indicated a lack of merit to the charges,

COUNT II

AND THE GRAND JURORS aforesaid, upon their oaths in said court present that MERVYN MOSBACKER, JR. hereinafter styled Defendant, on or about the 21st day of March 2007 A. D., did then and there intentionally subject the Hon. Juan Angel Guerra to an arrest and detention that the Defendant knew was unlawful, and the Defendant was then and there acting under color of his office as a public servant, namely, special prosecutor for the County of Willacy, State of Texas,

against the peace and dignity of the State.


Foeman of the Grand Jury

NO. _____

THE STATE OF TEXAS

VS.

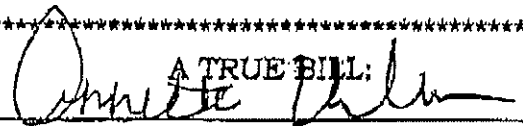
GEO GROUP, INCORPORATED, FORMERLY
WACKENHUT CORRECTIONS CORPORATION
AND DAVID FORREST

INDICTMENT

OFFENSE:

MURDER
AND
MANSLAUGHTER

JUAN ANGEL GUERRA
DISTRICT AND COUNTY ATTORNEY


Foreman of Grand Jury

Filed on _____ 2008

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

By: _____
Deputy

Amount of Bail _____
Bond set by Judge _____

of said facility,

The agent(s) then witnessed the assault on Gregorio De La Rosa, Jr., and failed to act in that such an assault was allowed, thereby causing the death of Gregorio De La Rosa, Jr. and by allowing one or more inmates to physically assault the victim and said inmates using or exhibiting a deadly weapon, to wit: socks with padlocks inside, a deadly weapon or an instrument that by the manner of its use, being capable of causing death, inasmuch as it did cause the death of Gregorio De La Rosa, Jr.,

The agent(s) acts or failure to act allowed 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 Correction Corporation hereinafter styled Defendant, being criminally responsible for a felony offense in that the commission of said offense was authorized, requested, commanded, performed or recklessly tolerated by a high managerial agent acting in behalf of the corporation and within the scope of his office or employment, and said agent was Co-Defendant, David Forrest, who was the warden and he was acting in the capacity of an agent of the Defendant corporation, while acting on behalf of the Defendant corporation, and within the scope of his office or employment, said agent(s), acted or failed to act were in violation of their duties imposed by law,

The acts of Defendant corporation and those of David Forrest, or failure to act allowed 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. On or about the 26th day of April, 2001 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, Defendant did then and there cause the death of Gregorio De La Rosa, Jr., an individual, who was an inmate in said corporation's buildings, duly designated as a prison facility,

On or about the 26th day of April, 2001 A.D., Defendant, David Forrest, the warden an agent of the Defendant corporation, while acting on behalf of the Defendant corporation, and within the scope of his office and employment, being a high managerial agent and acting in the scope of his office or employment, said

agent(s), 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 David Forrest, acting as agent of Defendant corporation in allowing one or more inmates to assault the victim, Gregorio De La Rosa, Jr., failed to stop an assault on victim by other inmates. The said agents operated the jail-type facility and were entrusted with all aspects of said facility,

The agent(s) then witnessed the assault on Gregorio De La Rosa, Jr., and failed to act in that such an assault was allowed, thereby causing the death of Gregorio De La Rosa, Jr. and by allowing one or more inmates to physically assault the victim and said inmates using or exhibiting a deadly weapon, to wit: socks with padlocks inside, a deadly weapon or an instrument that by the manner of its use, being capable of causing death, inasmuch as it did cause the death of Gregorio De La Rosa, Jr.,

The agent(s) acts or failure to act allowed one or more inmates attempted to commit a felony, to wit, an aggravated assault and thereby committed an act dangerous to human life, thereby the inmates began 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 III

AND THE GRAND JURORS aforesaid, upon their oaths in said court, present that the Defendant GEO Group, Incorporated, formerly Wackenhut Correction Corporation hereinafter styled Defendant, being criminally responsible for a felony offense in that the commission of said offense was authorized, requested, commanded, performed or recklessly tolerated by a high managerial agent acting in behalf of the corporation and within the scope of his office or employment, and said agent was Co-Defendant, David Forrest, who was the warden and he was acting in the capacity of an agent of the Defendant corporation, while acting on behalf of the Defendant corporation, and within the scope of his office or employment, said agent(s), acted or failed to act were in violation of their duties imposed by law,

The acts of Defendant corporation and those of David Forrest, or failure to act allowed 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. On or about the 26th day of April, 2001 A.D., 2001, and before the presentment of this indictment, in the County and State aforesaid, during the incarceration of

NO. _____


THE STATE OF TEXAS
VS.
EDDIE LUCIO, JR.

INDICTMENT

OFFENSE:

ACCEPTANCE OF HONORARIUM

JUAN ANGEL GUERRA
DISTRICT AND COUNTY ATTORNEY

A TRUE BILL:

Foreman of Grand Jury

Filed on _____ 2008

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

By: _____
Deputy

Amount of Bail _____
Bond set by Judge _____

36.07 ACCEPTANCE OF HONORARIUM

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 2008, A.D. of the 197th Judicial District Court for said County, upon their oaths present in and to said court at said term that **EDDIE LUCIO, JR.** hereinafter styled Defendant, from on or about the 1st day of January 2005 through 1st day of September 2008, A.D., did then and there as a public servant, being the senator for Willacy County, Texas in the Legislative of the State of Texas, District 27, as duly elected, accepted an honorarium, to wit; U. S. Currency in consideration for acting on behalf of Management and Training Corporation, as a consultant, said Defendant would not have been requested to provide but for said Defendant's official position. Said consultant services that Defendant provided on behalf of Management and Training Corporation included but not limited to Willacy County, Texas,

Defendant has, with this action, made a personal profit as a result of his holding said office as a Texas State Senator for District 27,

COUNT II

AND THE GRAND JURORS aforesaid, upon their oaths in said court present that **EDDIE LUCIO, JR.** hereinafter styled Defendant, from on or about the 1st day of January 2005 through 1st day of September 2008, A.D., did then and there as a public servant, being the senator for Willacy County, Texas in the Legislative of the State of Texas, District 27, as duly elected, accepted an honorarium, to wit; U. S. Currency in consideration for acting on behalf of CorPlan Corrections, as a consultant, said Defendant would not have been requested to provide but for said Defendant's official position. Said consultant services that Defendant provided on behalf of CorPlan Corrections included but not limited to Willacy County, Texas.

Defendant has, with this action, made a personal profit as a result of his holding said office as a Texas State Senator for District 27,

COUNT III

AND THE GRAND JURORS aforesaid, upon their oaths in said court present that **EDDIE LUCIO, JR.** hereinafter styled Defendant, from on or about the 1st day of January 2005 through 1st day of September 2008, A.D., did then

and there as a public servant, being the senator for Willacy County, Texas in the Legislative of the State of Texas, District 27, as duly elected, accepted an honorarium, to wit; U. S. Currency in consideration for acting on behalf of Aguirre, Inc., as a consultant, said Defendant would not have been requested to provide but for said Defendant's official position. Said consultant services that Defendant provided on behalf of Aguirre, Inc included but not limited to Willacy County, Texas,

Defendant has, with this action, made a personal profit as a result of his holding said office as a Texas State Senator for District 27,

COUNT IV

AND THE GRAND JURORS aforesaid, upon their oaths in said court present that EDDIE LUCIO, JR. hereinafter styled Defendant, from on or about the 1st day of January 2005 through 1st day of September 2008, A.D., did then and there as a public servant, being the senator for Willacy County, Texas in the Legislative of the State of Texas, District 27, as duly elected, accepted an honorarium, to wit; U. S. Currency in consideration for acting on behalf of Hale Mills Corporation, as a consultant, said Defendant would not have been requested to provide but for said Defendant's official position. Said consultant services that Defendant provided on behalf of Hale Mills Corporation included but not limited to Willacy County, Texas,

Defendant has, with this action, made a personal profit as a result of his holding said office as a Texas State Senator for District 27,

COUNT V

AND THE GRAND JURORS aforesaid, upon their oaths in said court present that EDDIE LUCIO, JR. hereinafter styled Defendant, from on or about the 1st day of January 2005 through 1st day of September 2008, A.D., did then and there as a public servant, being the senator for Willacy County, Texas in the Legislative of the State of Texas, District 27, as duly elected, accepted an honorarium, to wit; U. S. Currency in consideration for acting on behalf of TEDSI Infrastructure Group, Inc., as a consultant, said Defendant would not have been requested to provide but for said Defendant's official position. Said consultant services that Defendant provided on behalf of TEDSI Infrastructure Group, Inc., included but not limited to Willacy County, Texas,

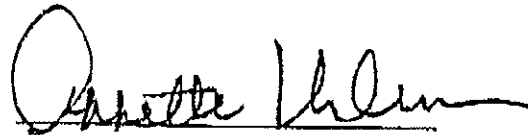
Defendant has, with this action, made a personal profit as a result of his holding said office as a Texas State Senator for District 27,

COUNT VI

AND THE GRAND JURORS aforesaid, upon their oaths in said court present that EDDIE LUCIO, JR. hereinafter styled Defendant, from on or about the 1st day of January 2005 through 1st day of September 2008, A.D., did then and there as a public servant, being the senator for Willacy County, Texas in the Legislative of the State of Texas, District 27, as duly elected, accepted an honorarium, to wit; U. S. Currency in consideration for acting on behalf of Dannenbaum Engineering Corporation as a consultant, said Defendant would not have been requested to provide but for said Defendant's official position. Said consultant services that Defendant provided on behalf of Dannenbaum Engineering Corporation included but not limited to Willacy County, Texas.

Defendant has, with this action, made a personal profit as a result of his holding said office as a Texas State Senator for District 27,

against the peace and dignity of the State.


Foreman of the Grand Jury

NO. _____

THE STATE OF TEXAS
VS.
JANET LEAL

INDICTMENT

OFFENSE:

OFFICIAL ABUSE OF OFFICIAL CAPACITY
AND
OFFICIAL OPPRESSION

JUAN ANGEL GUERRA
DISTRICT AND COUNTY ATTORNEY

A TRUE BILL:

Foreman of Grand Jury

Filed on _____ 2008

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

By: _____
Deputy

Amount of Bail _____

Bond set by Judge _____

39.02 OFFICIAL ABUSE OF OFFICIAL CAPACITY

39.03 OFFICIAL OPPRESSION

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 2008, A.D. of the 197th Judicial District Court for said County, upon their oaths present in and to said court at said term that HON. JUDGE JANET LEAL hereinafter styled Defendant, on or about the 10th day of February 2007, A.D., being the District Judge, in and for the County of Cameron, State of Texas, for the 103th Judicial District, did then and there intended to harm the duly elected District Attorney of Willacy County, Texas being the Hon. Juan Angel Guerra, Defendant intentionally or knowingly violated a law relating to the Defendant's office or employment position as a public servant namely, violated Article 18.01 of the Texas Code of Criminal Procedure, and said law relating to Defendant's office, by the Defendant issuing a search warrant to be served in a county outside of her jurisdiction, and said search warrant was to search or seizure of the Willacy County District Attorney's office,

COUNT II

AND THE GRAND JURORS aforesaid, upon their oaths in said court present that HON. JUDGE JANET LEAL hereinafter styled Defendant, on or about the 10th day of February 2007 A. D., did then and there intentionally subject the Hon. Juan Angel Guerra to search or seizure of the Willacy County District Attorney's Office that Defendant knew was unlawful and Defendant was then and there acting under color of her office as a public servant namely, 103th Judicial District Judge in and for County of Cameron, State of Texas, issued a search warrant that the Defendant knew or should have known that the Defendant had no jurisdiction to issue said search warrant,

COUNT III

AND THE GRAND JURORS aforesaid, upon their oaths in said court present that HON. JUDGE JANET LEAL hereinafter styled Defendant, on or about the 10th day of February 2007, A.D., being the District Judge, in and for the County of Cameron, State of Texas, for the 103rd Judicial District, did then and there intended to harm the duly elected District Attorney of Willacy County, Texas being the Hon. Juan Angel Guerra, Defendant intentionally or knowingly

violated a law relating to the Defendant's office or employment position as a public servant namely, violated Article 18.01 of Texas Code of Criminal Procedure in that the Defendant issued a warrant for an implement or instrument of a crime that the Defendant knew or should have known that the possession of said instruments was not illegal for the Hon. Juan Angel Guerra to have in his possession to wit;

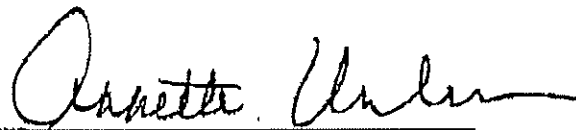
computers, hard drives, flash drives, floppy discs, and any other computer device that will store information electronically, all financial records, all receipts books and any and all records books of seized property and records of expenditures of forfeited funds, including files, tapes, videos and recordings

COUNT IV

AND THE GRAND JURORS aforesaid, upon their oaths in said court present that HON. JUDGE JANET LEAL hereinafter styled Defendant, on or about the 10th day of February 2007 A. D., did then and there intentionally subject the Hon. Juan Angel Guerra to search or seizure, that the Defendant knew was unlawful, and the Defendant was then and there acting under color of her office as a public servant namely, 103th Judicial District Judge in and for County of Cameron, State of Texas, Defendant illegally issued a search warrant of the office of District Attorney of Willacy County, Texas in that said warrant was for an implement or instrument of a crime that the Defendant knew or should have known that the possession of said property or instruments were not prohibited by law for the Hon. Juan Angel Guerra to have in his possession to wit;

computers, hard drives, flash drives, floppy discs, and any other computer device that will store information electronically, all financial records, all receipts books and any and all records books of seized property and records of expenditures of forfeited funds, including files, tapes, videos and recordings

against the peace and dignity of the State.



Foreman of the Grand Jury

NO. _____

THE STATE OF TEXAS
VS.
GILBERT LOZANO

INDICTMENT

OFFENSE:

OFFICIAL ABUSE OF OFFICIAL CAPACITY
AND
OFFICIAL OPPRESSION

JUAN ANGEL GUERRA
DISTRICT AND COUNTY ATTORNEY

A TRUE BILL:

Foreman of Grand Jury

Filed on _____ 2008

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

By: _____

Deputy

Amount of Bail _____

Bond set by Judge _____

39.02 OFFICIAL ABUSE OF OFFICIAL CAPACITY
39.03 OFFICIAL OPPRESSION

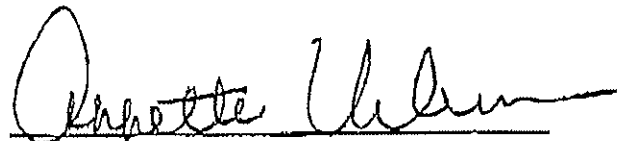
IN THE NAME AND BY THE AUTHORITY OF THE STATE OF TEXAS:

THE GRAND JURY, for the County of Willacy, State of Texas, duly selected, empaneled, sworn, charged, and organized as such at the July Term 2008, A.D. of the 197th Judicial District Court for said County, upon their oaths present in and to said court at said term that GILBERT LOZANO hereinafter styled Defendant, on or about the 22nd day of March 2007, A.D., being the district clerk, duly elected, in and for the County of Willacy, State of Texas, as district clerk for the 197th Judicial District, did then and there intended to harm the duly elected District Attorney of Willacy County, Texas being the Hon. Juan Angel Guerra, Defendant intentionally or knowingly violated a law relating to the Defendant's office as a public servant namely, violated Article 23.03 of the Texas Code of Criminal Procedure, and said law relating to Defendant's office, by issuing capias on Cause No. 2007-CR008A and 2007-CR-009A to have the Hon. Juan Angel Guerra arrested without first having the indictments presented, after bail has been set or denied by the judge of the court,

COUNT II

AND THE GRAND JURORS aforesaid, upon their oaths in said court present that GILBERT LOZANO hereinafter styled Defendant, on or about the 22ND day of March 2007 A. D., did then and there intentionally subject the Hon. Juan Angel Guerra to an arrest and detention in Cause No. 2007-CR-0010A that the Defendant knew was unlawful, in that no judge had either set or denied bail, as mandated to wit; violated Article 23.03 (a) of the Texas Code of Criminal Procedure and the Defendant was then and there acting under color of his office as a public servant, namely, Willacy County District Clerk,

against the peace and dignity of the State.



Foreman of the Grand Jury

NO. _____

THE STATE OF TEXAS
VS.
RICHARD B. CHENEY
and
ALBERTO GONZALES

INDICTMENT

OFFENSE:

ENGAGING IN ORGANIZED CRIMINAL ACTIVITY

JUAN ANGEL GUERRA
DISTRICT AND COUNTY ATTORNEY

A TRUE BILL:



Foreman of Grand Jury

Filed on _____ 2008

GILBERT LOZANO

Clerk of the District Courts of
Willacy County, Texas

By: _____

Deputy

Amount of Bail _____

Bond set by Judge _____

71.02 ENGAGING IN ORGANIZED CRIMINAL ACTIVITY

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 2008, A.D. of the 197th Judicial District Court for said County, upon their oaths present in and to said court at said term that **RICHARD B. CHENEY**, Vice President for the United States of America, **ALBERTO GONZALES**, formerly the Attorney General for the United State of America AND **PRISON FOR PROFIT CORPORATIONS**, to include but not limited to Corrections Corporation of America, aka C.C.A., Geo Group Inc., formerly Wackenhut Correction Corporation and Cornell Companies Inc., **CO-ACTOR BUT NOT CO-DEFENDANTS**, hereinafter styled Defendants, on or about the 23rd day of April 2001, A.D. and through the present date November 17, 2008, did then and there with the intent to establish, maintain or participate in a combination or in the profits of a combination, each Defendant committed the crime of neglect of United States Citizen prisoners, federal prisoners and federal detainees and that said neglect included but not limited of allowing assault to inmates and/or detainees by other inmates and/or detainees and that said acts amount to at least acts punishable as a class A. misdemeanor assaults,

By working through corporations as prisons for profit, Defendant **RICHARD B. CHENEY** has committed at least misdemeanor assaults of our inmates and/or detainees through allowing some of the inmates and/or detainees to commit such assaults on our other inmates and/or detainees.

Defendant Richard B. Cheney exerts a tremendous amount of influence on U.S. Immigration and Customs Enforcement, hereinafter referred as ICE which is in charge of the well being and safe keeping of our detainees. Billions of dollars in contracts have been awarded by ICE to prison for profit corporations, to include but not limited to Corrections Corporation of America, aka C.C.A., Geo Group Inc., formerly Wackenhut Correction Corporation and Cornell Companies Inc to house federal inmates and/or detainees and/or contract with counties such as Willacy County Texas for the detention and care of aliens (thereafter referred to as detainees) who in turn contract with said prisons for profit corporations. ICE Inspectors periodic inspections of said facilities to assure detainee's civil rights are not being violated are not adequate,

After hearing the testimony of numerous witnesses such as experts from throughout our country of the private prisons for profit corporations, state legislatures from Texas and from other states and from families of inmates that

have died in said private prisons it is apparent that numerous civil rights violations are occurring inside the private prison walls. Many of the deaths have been attributed to the lack of medical attention of those in custody,

It was apparent that no government officials made efforts to properly investigate the death of Gregorio De La Rosa, Jr., on April 26, 2001 while being detained inside a private prison in Willacy County, Texas. This was due to the fact of the money being made by the private prison companies and to include government officials,

In the case of our Vice President the money trail can easily be traced. First, most of the stocks that are reported in Defendant, Richard B. Cheney's, income tax are in the Vanguard Group. Defendant, Richard B. Cheney, has over 85 million dollars invested in said company. The Vanguard Group appears on the top ten list of companies that have investments in the top three companies that house our Federal detainees that are being rounded up by ICE officials. This is a direct conflict of interest with regard to Defendant, Richard B. Cheney because as previously mentioned, Defendant, Richard B. Cheney exerts a tremendous amount influence on ICE and has a say in as to how much ICE will pay the said private prison per diem to house our detainees, which currently average about \$80.00 per day per detainee. The conflict is that the more money ICE agree to pay to the private prison companies, the more profit the said companies make and in turn make more profit for their share holders which includes Vanguard Group where Defendant, Richard B. Cheney, has millions of investments,

While it is obvious that private prisons companies prioritize their profits over the needs of those in their custody, it is appalling to find that numerous elected officials from different levels of our government throughout our country to our U.S. Vice President Richard B. Cheney, Defendant, are profiting from depriving human beings of their liberty. This is inherently unethical in that these are the same elected officials that should be looking out for the well being of our state and/or federal prisoners or detainees. It should be the role of our state and federal government to house and maintain custody of our inmates and/or detainees and not contract them out to private prisons in which their fiduciary duty is to make a profit to their stockholders and not for the well being of those in their custody. If this trend continues the number of death of inmates and/or detainees in prisons for profit will continue to escalate. If you want to see how a nation treats its own citizens one must look no further than to see how said nation is treating its prisoners.

By personally investing and having stocks in private prisons corporations such as Corrections Corporation of America, aka C.C.A., Geo Group Inc., formerly Wackenhut Correction Corporation and Cornell Companies Inc., the same private prisons for profit that house our detainees and/or inmates and that contract with

Immigration and Custom Enforcement (ICE), Defendant Richard B. Cheney our Vice President is illegally profiting contrary to our Texas Constitution article III, section 18 which its proscription is intended to prevent an office holder from personally profiting as a result of holding said office,

Defendant Alberto Gonzales while acting as the Attorney General for the United State of America participated by further having used his position as United States Attorney General on or about the 22nd of November, A.D. to stop the investigations as to the wrong doings which includes the assaults committed in the prison for profit in Willacy County, Texas,

WE THE GRAND JURY OF WILLACY COUNTY TEXAS duly selected and empaneled, and with great sadness, concerned and because we love our country have no choice but to move to indict our sitting Vice President Richard B. Cheney and Alberto Gonzales, formerly the United State Attorney General of **ENGAGING IN ORGANIZED CRIMINAL ACTIVITY,**

against the peace and dignity of the State.


Foreman of the Grand Jury