

STATE OF INDIANA) IN THE JEFFERSON CIRCUIT COURT
) SS:
COUNTY OF JEFFERSON)

FILED
OCT 13 2016

Sharon Palm
Clerk Jefferson Superior Circuit Court

STATE OF INDIANA) INFORMATION
) COUNT: I
 V.) BATTERY, Level 4 Felony
) I.C. 35-42-2-1
 SHARON BACK)

) COUNTS: II - VII
 W/F DOB 12/2/1951) BATTERY, Level 5 Felony
 SSN 400-76-8678) I.C. 35-42-2-1

) COUNTS: VIII
) STRANGULATION, Level 6 Felony
) I.C. 35-42-2-9

CAUSE NO. 39601-16010-F4-

I the undersigned affiant, being duly sworn on my oath or
~~having affirmed, say that in Jefferson County, Indiana:~~

COUNT I

On or about, December 31, 2014, in Jefferson County, State of Indiana, SHARON BACK, having the care of L.J., a person with a physical or mental disability; knowingly touched L.J. in a rude, insolent or angry manner, to wit: stomped on his ankle with her foot; resulting in serious bodily injury to L.J., to wit: a complex, obliquely oriented fracture of his ankle.

COUNT II

On or between August 21, 2014 and September 5, 2015, in Jefferson County, State of Indiana, SHARON BACK, having the care of L.J., a person with a physical or mental disability; knowingly

touched L.J. in a rude, insolent or angry manner, to wit: slapped his face, saying that she was going to, "slap the black off of [him];" resulting in bodily injury to L.J., to wit: pain.

COUNT III

On or between August 21, 2014 and September 5, 2015, in ~~Jefferson County, State of Indiana, SHARON BACK, having the care~~ of L.J., a person with a physical or mental disability; knowingly touched L.J. in a rude, insolent or angry manner, to wit: dragged him across the floor by his clothing, saying that he should be euthanized; resulting in bodily injury to L.J., to wit: pain.

COUNT IV

On or about August 31, 2015, in Jefferson County, State of Indiana, SHARON BACK, having the care of D.K., a person with a physical or mental disability; knowingly touched D.K. in a rude, insolent or angry manner, to wit: angrily grabbed his face and poured a drink down his throat; resulting in bodily injury to D.K., to wit: causing him pain and causing him to cough and gag.

COUNT V

On or between August 21, 2014 and September 5, 2015, in Jefferson County, State of Indiana, SHARON BACK, having the care of L.A., a person with a physical or mental disability; knowingly touched L.A. in a rude, insolent or angry manner, to wit: angrily poured a drink down his throat, while calling him a "sissy;"

resulting in bodily injury to L.A., to wit: causing him pain and causing him to cough and gag.

COUNT VI

On or between August 21, 2014 and September 5, 2015, in Jefferson County, State of Indiana, SHARON BACK, having the care of L.A., a person with a physical or mental disability; knowingly touched L.A. in a rude, insolent or angry manner, to wit: leaned on him and pinned his arms down in his bed, while calling him an "idiot;" resulting in bodily injury to L.A., to wit: pain.

COUNT VII

On or between August 21, 2014 and September 5, 2015, in Jefferson County, State of Indiana, SHARON BACK, having the care of R.S., a person with a physical or mental disability; knowingly touched R.S. in a rude, insolent or angry manner, to wit: roughly pushed or pulled him out of his chair in the dining room and left him lying on the floor during a meal; resulting in bodily injury to R.S., to wit: pain.

COUNT VIII

On or about September 4, 2015, in Jefferson County, State of Indiana, SHARON BACK knowingly applied pressure to the neck or throat of D.K. in a rude, insolent or angry manner, that impeded his normal breathing or blood circulation.

all of which is contrary to statute and against the peace and dignity of the State of Indiana.

I swear (affirm), under penalty of perjury as specified by IC 35-44-2-1 that the foregoing representations are true as I am informed and believe.

10/12/14
Date

Wendy Shake
Wendy Shake, Investigator
Indiana Medicaid Fraud Control Unit
Affiant

Maween M Devlin
Attorney, # 18607-49

STATE'S WITNESSES:

Wendy Shake, MFCU
~~Jessica Jones, MFCU~~
Debora Woodfill, R.N.
Connie Adams, R.N.
Cherokee Gunter
Cathy Sue Daugherty
Rachelle Shepherd
Amy Gambrell
Helen Miller, L.P.N.
Jennifer Rowlett, R.N.
James Fleenor, L.P.N.
David Brewer, M.D.
Vincent Porter, M.D.
Raymonda Stevens, M.D.
Travis Clegg, M.D.