

Count I only

\$ 10,000	<input checked="" type="checkbox"/> STRY	<input type="checkbox"/> PR
Pretrial Release	<input type="checkbox"/>	
Elect. Monitor	<input type="checkbox"/>	
6-6 Curfew	<input type="checkbox"/>	
No Contact w/victim	<input type="checkbox"/>	
Other-See Probation	<input type="checkbox"/>	

**Charge:**  
 ABANDONING/ENDANGERING  
 CHILD  
 10 COUNTS  
 Article 22.041(c) Texas Penal Code  
**Degree-Each Count:**  
 State Jail Felony

CAUSE NO. 2024-06-16368-CR

THE STATE OF TEXAS                    §            IN THE DISTRICT COURT

V.    §            38<sup>TH</sup> JUDICIAL DISTRICT

PETE ARREDONDO                    §            UVALDE COUNTY, TEXAS

DOB: 04/11/1972

████████████████████

Uvalde, Texas 78801

*Counts II - X*

\$ 10,000	<input type="checkbox"/> STRY	<input checked="" type="checkbox"/> PR
Pretrial Release	<input type="checkbox"/>	
Elect. Monitor	<input type="checkbox"/>	
6-6 Curfew	<input type="checkbox"/>	
No Contact w/victim	<input type="checkbox"/>	
Other-See Probation	<input type="checkbox"/>	

**INDICTMENT**

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

**COUNT I**

THE GRAND JURY, for the County of Uvalde, State of Texas, duly selected impaneled, sworn, charged, and organized as such at the JANUARY Term A.D. 2024 of the 38<sup>th</sup> Judicial District Court for said County, and State upon their oaths present in and to said court at said term that **PETE ARREDONDO** hereinafter styled the Defendant, on or about the 24<sup>th</sup> day of May, 2022, and before the presentment of this indictment, in the County and State aforesaid, as a peace officer and Police Chief of Uvalde Consolidated Independent School District, and while incident commander of an incident involving an active shooter on a school campus which was under his control, to wit: Robb Elementary School in Uvalde, Texas, by act and omission, intentionally, knowingly, recklessly and with criminal negligence placed Noah Oscar Orona, a child younger than 15 years of age, in imminent danger of bodily injury, death, physical

impairment and mental impairment, by engaging in one or more of the following acts or omissions:

- a. After hearing shots being fired in a room at Robb Elementary School, failed to identify the incident as an active shooter incident, failed to respond as trained to an active shooter incident, and instead called for SWAT thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- b. After hearing shots being fired in a room at Robb Elementary School and after being advised that a teacher had been shot, failed to identify the incident as an active shooter incident and failed to respond as trained to an active shooter incident, and instead called for SWAT thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- c. After being advised that a child or children were injured in a class at Robb Elementary School failed to identify the incident as an active shooter incident and failed to respond as trained to an active shooter incident and instead directed law enforcement officers to evacuate the wing before confronting the shooter thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- d. Failing to enforce an active shooter response plan developed by the Uvalde Consolidated Independent School District by evacuating students before stopping an active shooter thereby delaying the response by law enforcement officers to an active

- shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- e. Failing to follow active shooter training he received by deciding and declaring to others to delay breaching a room occupied by a gunman at Robb Elementary School until classrooms were evacuated thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
  - f. Deciding to negotiate and attempting to negotiate with a gunman in Rooms 111 and 112 of Robb Elementary School while the gunman was engaged in an active shooter incident thereby delaying the response by law enforcement officers to a gunman who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
  - g. Failing to determine if the door to classroom 111 at Robb Elementary School was locked thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
  - h. Failing to timely provide keys and breaching tools to enter classrooms 111 and 112 of Robb Elementary School, thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
  - i. Failing to follow an active shooter response policy developed by the Uvalde Consolidated Independent School District by failing to establish a command center and failing to direct others to establish a command center thereby leaving law

enforcement officers and Border Patrol agents without clear information or direction regarding the active shooter incident at Robb Elementary School, thereby delaying the response by law enforcement officers and Border Patrol agents to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.

- j. Failing to develop an immediate action plan, direct others to develop an immediate action plan, and communicate to others an immediate action plan to respond to a gunman in the event the gunman resumed shooting in rooms 111 and 112 of Robb Elementary School thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Rooms 111 and 112 at Robb Elementary School.

And the said Defendant did not voluntarily deliver the child or children named above to a designated emergency infant care provider under Section 262.302, Family Code.

## **COUNT II**

AND IT IS FURTHER PRESENTED that **PETE ARREDONDO** hereinafter styled the Defendant, on or about the 24<sup>th</sup> day of May, 2022, and before the presentment of this indictment, in the County and State aforesaid, as a peace officer and Police Chief of Uvalde Consolidated Independent School District, and while incident commander of an incident involving an active shooter on a school campus which was under his control, to wit: Robb Elementary School in Uvalde, Texas, by act and omission, intentionally, knowingly, recklessly and with criminal negligence placed Khloie Melinda Torres, a child younger than 15 years of age, in imminent danger of bodily injury, death, physical impairment and mental impairment, by engaging in one or more of the following acts or omissions:

- a. After hearing shots being fired in a room at Robb Elementary School, failed to identify the incident as an active shooter incident, failed to respond as trained to an active shooter incident, and instead called for SWAT thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- b. After hearing shots being fired in a room at Robb Elementary School and after being advised that a teacher had been shot, failed to identify the incident as an active shooter incident and failed to respond as trained to an active shooter incident, and instead called for SWAT thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- c. After being advised that a child or children were injured in a class at Robb Elementary School failed to identify the incident as an active shooter incident and failed to respond as trained to an active shooter incident and instead directed law enforcement officers to evacuate the wing before confronting the shooter thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- d. Failing to enforce an active shooter response plan developed by the Uvalde Consolidated Independent School District by evacuating students before stopping an active shooter thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.

- e. Failing to follow active shooter training he received by deciding and declaring to others to delay breaching a room occupied by a gunman at Robb Elementary School until classrooms were evacuated thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- f. Deciding to negotiate and attempting to negotiate with a gunman in Rooms 111 and 112 of Robb Elementary School while the gunman was engaged in an active shooter incident thereby delaying the response by law enforcement officers to a gunman who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- g. Failing to determine if the door to classroom 111 at Robb Elementary School was locked thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- h. Failing to timely provide keys and breaching tools to enter classrooms 111 and 112 of Robb Elementary School, thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- i. Failing to follow an active shooter response policy developed by the Uvalde Consolidated Independent School District by failing to establish a command center and failing to direct others to establish a command center thereby leaving law enforcement officers and Border Patrol agents without clear information or direction regarding the active shooter incident at Robb Elementary School, thereby delaying



the response by law enforcement officers and Border Patrol agents to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.

- j. Failing to develop an immediate action plan, direct others to develop an immediate action plan, and communicate to others an immediate action plan to respond to a gunman in the event the gunman resumed shooting in rooms 111 and 112 of Robb Elementary School thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Rooms 111 and 112 at Robb Elementary School.

And the said Defendant did not voluntarily deliver the child or children named above to a designated emergency infant care provider under Section 262.302, Family Code.

### **COUNT III**

AND IT IS FURTHER PRESENTED that **PETE ARREDONDO** hereinafter styled the Defendant, on or about the 24<sup>th</sup> day of May, 2022, and before the presentment of this indictment, in the County and State aforesaid, as a peace officer and Police Chief of Uvalde Consolidated Independent School District, and while incident commander of an incident involving an active shooter on a school campus which was under his control, to wit: Robb Elementary School in Uvalde, Texas, by act and omission, intentionally, knowingly, recklessly and with criminal negligence placed Jordan Demetrio Olivarez, a child younger than 15 years of age, in imminent danger of bodily injury, death, physical impairment and mental impairment, by engaging in one or more of the following acts or omissions:

- a. After hearing shots being fired in a room at Robb Elementary School, failed to identify the incident as an active shooter incident, failed to respond as trained to

an active shooter incident, and instead called for SWAT thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.

- b. After hearing shots being fired in a room at Robb Elementary School and after being advised that a teacher had been shot, failed to identify the incident as an active shooter incident and failed to respond as trained to an active shooter incident, and instead called for SWAT thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- c. After being advised that a child or children were injured in a class at Robb Elementary School failed to identify the incident as an active shooter incident and failed to respond as trained to an active shooter incident and instead directed law enforcement officers to evacuate the wing before confronting the shooter thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- d. Failing to enforce an active shooter response plan developed by the Uvalde Consolidated Independent School District by evacuating students before stopping an active shooter thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- e. Failing to follow active shooter training he received by deciding and declaring to others to delay breaching a room occupied by a gunman at Robb Elementary School until classrooms were evacuated thereby delaying the response by law



enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.

- f. Deciding to negotiate and attempting to negotiate with a gunman in Rooms 111 and 112 of Robb Elementary School while the gunman was engaged in an active shooter incident thereby delaying the response by law enforcement officers to a gunman who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- g. Failing to determine if the door to classroom 111 at Robb Elementary School was locked thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- h. Failing to timely provide keys and breaching tools to enter classrooms 111 and 112 of Robb Elementary School, thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- i. Failing to follow an active shooter response policy developed by the Uvalde Consolidated Independent School District by failing to establish a command center and failing to direct others to establish a command center thereby leaving law enforcement officers and Border Patrol agents without clear information or direction regarding the active shooter incident at Robb Elementary School, thereby delaying the response by law enforcement officers and Border Patrol agents to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.

- j. Failing to develop an immediate action plan, direct others to develop an immediate action plan, and communicate to others an immediate action plan to respond to a gunman in the event the gunman resumed shooting in rooms 111 and 112 of Robb Elementary School thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Rooms 111 and 112 at Robb Elementary School.

And the said Defendant did not voluntarily deliver the child or children named above to a designated emergency infant care provider under Section 262.302, Family Code.

#### COUNT IV

AND IT IS FURTHER PRESENTED that **PETE ARREDONDO** hereinafter styled the Defendant, on or about the 24<sup>th</sup> day of May, 2022, and before the presentment of this indictment, in the County and State aforesaid, as a peace officer and Police Chief of Uvalde Consolidated Independent School District, and while incident commander of an incident involving an active shooter on a school campus which was under his control, to wit: Robb Elementary School in Uvalde, Texas, by act and omission, intentionally, knowingly, recklessly and with criminal negligence placed Jayden Carrizales, a child younger than 15 years of age, in imminent danger of bodily injury, death, physical impairment and mental impairment, by engaging in one or more of the following acts or omissions:

- a. After hearing shots being fired in a room at Robb Elementary School, failed to identify the incident as an active shooter incident, failed to respond as trained to an active shooter incident, and instead called for SWAT thereby delaying the response by law enforcement officers to an active shooter who was

hunting and shooting a child or children in Room 112 at Robb Elementary School.

- b. After hearing shots being fired in a room at Robb Elementary School and after being advised that a teacher had been shot, failed to identify the incident as an active shooter incident and failed to respond as trained to an active shooter incident, and instead called for SWAT thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- c. After being advised that a child or children were injured in a class at Robb Elementary School failed to identify the incident as an active shooter incident and failed to respond as trained to an active shooter incident and instead directed law enforcement officers to evacuate the wing before confronting the shooter thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- d. Failing to enforce an active shooter response plan developed by the Uvalde Consolidated Independent School District by evacuating students before stopping an active shooter thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- e. Failing to follow active shooter training he received by deciding and declaring to others to delay breaching a room occupied by a gunman at Robb Elementary School until classrooms were evacuated thereby delaying the

response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.

- f. Deciding to negotiate and attempting to negotiate with a gunman in Rooms 111 and 112 of Robb Elementary School while the gunman was engaged in an active shooter incident thereby delaying the response by law enforcement officers to a gunman who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- g. Failing to determine if the door to classroom 111 at Robb Elementary School was locked thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- h. Failing to timely provide keys and breaching tools to enter classrooms 111 and 112 of Robb Elementary School, thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- i. Failing to follow an active shooter response policy developed by the Uvalde Consolidated Independent School District by failing to establish a command center and failing to direct others to establish a command center thereby leaving law enforcement officers and Border Patrol agents without clear information or direction regarding the active shooter incident at Robb Elementary School, thereby delaying the response by law enforcement officers and Border Patrol agents to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.

- j. Failing to develop an immediate action plan, direct others to develop an immediate action plan, and communicate to others an immediate action plan to respond to a gunman in the event the gunman resumed shooting in rooms 111 and 112 of Robb Elementary School thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Rooms 111 and 112 at Robb Elementary School.

And the said Defendant did not voluntarily deliver the child or children named above to a designated emergency infant care provider under Section 262.302, Family Code.

#### COUNT V

AND IT IS FURTHER PRESENTED that **PETE ARREDONDO** hereinafter styled the Defendant, on or about the 24<sup>th</sup> day of May, 2022, and before the presentment of this indictment, in the County and State aforesaid, as a peace officer and Police Chief of Uvalde Consolidated Independent School District, and while incident commander of an incident involving an active shooter on a school campus which was under his control, to wit: Robb Elementary School in Uvalde, Texas, by act and omission, intentionally, knowingly, recklessly and with criminal negligence placed Samuel N. Salinas, a child younger than 15 years of age, in imminent danger of bodily injury, death, physical impairment and mental impairment, by engaging in one or more of the following acts or omissions:

- a. After hearing shots being fired in a room at Robb Elementary School, failed to identify the incident as an active shooter incident, failed to respond as trained to an active shooter incident, and instead called for SWAT thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.

- b. After hearing shots being fired in a room at Robb Elementary School and after being advised that a teacher had been shot, failed to identify the incident as an active shooter incident and failed to respond as trained to an active shooter incident, and instead called for SWAT thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- c. After being advised that a child or children were injured in a class at Robb Elementary School failed to identify the incident as an active shooter incident and failed to respond as trained to an active shooter incident and instead directed law enforcement officers to evacuate the wing before confronting the shooter thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- d. Failing to enforce an active shooter response plan developed by the Uvalde Consolidated Independent School District by evacuating students before stopping an active shooter thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- e. Failing to follow active shooter training he received by deciding and declaring to others to delay breaching a room occupied by a gunman at Robb Elementary School until classrooms were evacuated thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- f. Deciding to negotiate and attempting to negotiate with a gunman in Rooms 111 and 112 of Robb Elementary School while the gunman was engaged in an active shooter incident



thereby delaying the response by law enforcement officers to a gunman who was hunting and shooting a child or children in Room 112 at Robb Elementary School.

- g. Failing to determine if the door to classroom 111 at Robb Elementary School was locked thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- h. Failing to timely provide keys and breaching tools to enter classrooms 111 and 112 of Robb Elementary School, thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- i. Failing to follow an active shooter response policy developed by the Uvalde Consolidated Independent School District by failing to establish a command center and failing to direct others to establish a command center thereby leaving law enforcement officers and Border Patrol agents without clear information or direction regarding the active shooter incident at Robb Elementary School, thereby delaying the response by law enforcement officers and Border Patrol agents to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- j. Failing to develop an immediate action plan, direct others to develop an immediate action plan, and communicate to others an immediate action plan to respond to a gunman in the event the gunman resumed shooting in rooms 111 and 112 of Robb Elementary School thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Rooms 111 and 112 at Robb Elementary School.

And the said Defendant did not voluntarily deliver the child or children named above to a designated emergency infant care provider under Section 262.302, Family Code.

### COUNT VI

AND IT IS FURTHER PRESENTED that **PETE ARREDONDO** hereinafter styled the Defendant, on or about the 24<sup>th</sup> day of May, 2022, and before the presentment of this indictment, in the County and State aforesaid, as a peace officer and Police Chief of Uvalde Consolidated Independent School District, and while incident commander of an incident involving an active shooter on a school campus which was under his control, to wit: Robb Elementary School in Uvalde, Texas, by act and omission, intentionally, knowingly, recklessly and with criminal negligence placed Kendall Faith Olivarez, a child younger than 15 years of age, in imminent danger of bodily injury, death, physical impairment and mental impairment, by engaging in one or more of the following acts or omissions:

- a. After hearing shots being fired in a room at Robb Elementary School, failed to identify the incident as an active shooter incident, failed to respond as trained to an active shooter incident, and instead called for SWAT thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- b. After hearing shots being fired in a room at Robb Elementary School and after being advised that a teacher had been shot, failed to identify the incident as an active shooter incident and failed to respond as trained to an active shooter incident, and instead called for SWAT thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.

- c. After being advised that a child or children were injured in a class at Robb Elementary School failed to identify the incident as an active shooter incident and failed to respond as trained to an active shooter incident and instead directed law enforcement officers to evacuate the wing before confronting the shooter thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- d. Failing to enforce an active shooter response plan developed by the Uvalde Consolidated Independent School District by evacuating students before stopping an active shooter thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- e. Failing to follow active shooter training he received by deciding and declaring to others to delay breaching a room occupied by a gunman at Robb Elementary School until classrooms were evacuated thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- f. Deciding to negotiate and attempting to negotiate with a gunman in Rooms 111 and 112 of Robb Elementary School while the gunman was engaged in an active shooter incident thereby delaying the response by law enforcement officers to a gunman who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- g. Failing to determine if the door to classroom 111 at Robb Elementary School was locked thereby delaying the response by law enforcement officers to an active

shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.

- h. Failing to timely provide keys and breaching tools to enter classrooms 111 and 112 of Robb Elementary School, thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- i. Failing to follow an active shooter response policy developed by the Uvalde Consolidated Independent School District by failing to establish a command center and failing to direct others to establish a command center thereby leaving law enforcement officers and Border Patrol agents without clear information or direction regarding the active shooter incident at Robb Elementary School, thereby delaying the response by law enforcement officers and Border Patrol agents to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- j. Failing to develop an immediate action plan, direct others to develop an immediate action plan, and communicate to others an immediate action plan to respond to a gunman in the event the gunman resumed shooting in rooms 111 and 112 of Robb Elementary School thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Rooms 111 and 112 at Robb Elementary School.

And the said Defendant did not voluntarily deliver the child or children named above to a designated emergency infant care provider under Section 262.302, Family Code.

## **COUNT VII**

AND IT IS FURTHER PRESENTED that **PETE ARREDONDO** hereinafter styled the Defendant, on or about the 24<sup>th</sup> day of May, 2022, and before the presentment of this indictment, in the County and State aforesaid, as a peace officer and Police Chief of Uvalde Consolidated Independent School District, and while incident commander of an incident involving an active shooter on a school campus which was under his control, to wit: Robb Elementary School in Uvalde, Texas, by act and omission, intentionally, knowingly, recklessly and with criminal negligence placed Miah Cerillo, a child younger than 15 years of age, in imminent danger of bodily injury, death, physical impairment and mental impairment, by engaging in one or more of the following acts or omission:

- a. After hearing shots being fired in a room at Robb Elementary School, failed to identify the incident as an active shooter incident, failed to respond as trained to an active shooter incident, and instead called for SWAT thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- b. After hearing shots being fired in a room at Robb Elementary School and after being advised that a teacher had been shot, failed to identify the incident as an active shooter incident and failed to respond as trained to an active shooter incident, and instead called for SWAT thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- c. After being advised that a child or children were injured in a class at Robb Elementary School failed to identify the incident as an active shooter incident and failed to respond as trained to an active shooter incident and instead directed law

enforcement officers to evacuate the wing before confronting the shooter thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.

- d. Failing to enforce an active shooter response plan developed by the Uvalde Consolidated Independent School District by evacuating students before stopping an active shooter thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- e. Failing to follow active shooter training he received by deciding and declaring to others to delay breaching a room occupied by a gunman at Robb Elementary School until classrooms were evacuated thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- f. Deciding to negotiate and attempting to negotiate with a gunman in Rooms 111 and 112 of Robb Elementary School while the gunman was engaged in an active shooter incident thereby delaying the response by law enforcement officers to a gunman who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- g. Failing to determine if the door to classroom 111 at Robb Elementary School was locked thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.



- h. Failing to timely provide keys and breaching tools to enter classrooms 111 and 112 of Robb Elementary School, thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- i. Failing to follow an active shooter response policy developed by the Uvalde Consolidated Independent School District by failing to establish a command center and failing to direct others to establish a command center thereby leaving law enforcement officers and Border Patrol agents without clear information or direction regarding the active shooter incident at Robb Elementary School, thereby delaying the response by law enforcement officers and Border Patrol agents to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- j. Failing to develop an immediate action plan, direct others to develop an immediate action plan, and communicate to others an immediate action plan to respond to a gunman in the event the gunman resumed shooting in rooms 111 and 112 of Robb Elementary School thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Rooms 111 and 112 at Robb Elementary School.

And the said Defendant did not voluntarily deliver the child or children named above to a designated emergency infant care provider under Section 262.302, Family Code.

### **COUNT VIII**

AND IT IS FURTHER PRESENTED that **PETE ARREDONDO** hereinafter styled the Defendant, on or about the 24<sup>th</sup> day of May, 2022, and before the presentment of this indictment,

in the County and State aforesaid, as a peace officer and Police Chief of Uvalde Consolidated Independent School District, and while incident commander of an incident involving an active shooter on a school campus which was under his control, to wit: Robb Elementary School in Uvalde, Texas, by act and omission, intentionally, knowingly, recklessly and with criminal negligence placed A. J. Martinez, a child younger than 15 years of age, in imminent danger of bodily injury, death, physical impairment and mental impairment.

by engaging in one or more of the following acts or omissions:

- a. After hearing shots being fired in a room at Robb Elementary School, failed to identify the incident as an active shooter incident, failed to respond as trained to an active shooter incident, and instead called for SWAT thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- b. After hearing shots being fired in a room at Robb Elementary School and after being advised that a teacher had been shot, failed to identify the incident as an active shooter incident and failed to respond as trained to an active shooter incident, and instead called for SWAT thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- c. After being advised that a child or children were injured in a class at Robb Elementary School failed to identify the incident as an active shooter incident and failed to respond as trained to an active shooter incident and instead directed law enforcement officers to evacuate the wing before confronting the shooter thereby

- delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- d. Failing to enforce an active shooter response plan developed by the Uvalde Consolidated Independent School District by evacuating students before stopping an active shooter thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
  - e. Failing to follow active shooter training he received by deciding and declaring to others to delay breaching a room occupied by a gunman at Robb Elementary School until classrooms were evacuated thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
  - f. Deciding to negotiate and attempting to negotiate with a gunman in Rooms 111 and 112 of Robb Elementary School while the gunman was engaged in an active shooter incident thereby delaying the response by law enforcement officers to a gunman who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
  - g. Failing to determine if the door to classroom 111 at Robb Elementary School was locked thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
  - h. Failing to timely provide keys and breaching tools to enter classrooms 111 and 112 of Robb Elementary School, thereby delaying the response by law enforcement officers

to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.

- i. Failing to follow an active shooter response policy developed by the Uvalde Consolidated Independent School District by failing to establish a command center and failing to direct others to establish a command center thereby leaving law enforcement officers and Border Patrol agents without clear information or direction regarding the active shooter incident at Robb Elementary School, thereby delaying the response by law enforcement officers and Border Patrol agents to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- j. Failing to develop an immediate action plan, direct others to develop an immediate action plan, and communicate to others an immediate action plan to respond to a gunman in the event the gunman resumed shooting in rooms 111 and 112 of Robb Elementary School thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Rooms 111 and 112 at Robb Elementary School.

And the said Defendant did not voluntarily deliver the child or children named above to a designated emergency infant care provider under Section 262.302, Family Code.

### COUNT IX

AND IT IS FURTHER PRESENTED that **PETE ARREDONDO** hereinafter styled the Defendant, on or about the 24<sup>th</sup> day of May, 2022, and before the presentment of this indictment, in the County and State aforesaid, as a peace officer and Police Chief of Uvalde Consolidated Independent School District, and while incident commander of an incident involving an active

shooter on a school campus which was under his control, to wit: Robb Elementary School in Uvalde, Texas, by act and omission, intentionally, knowingly, recklessly and with criminal negligence placed Gilberto E. Mata, a child younger than 15 years of age, in imminent danger of bodily injury, death, physical impairment and mental impairment, by engaging in one or more of the following acts or omissions:

- a. After hearing shots being fired in a room at Robb Elementary School, failed to identify the incident as an active shooter incident, failed to respond as trained to an active shooter incident, and instead called for SWAT thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- b. After hearing shots being fired in a room at Robb Elementary School and after being advised that a teacher had been shot, failed to identify the incident as an active shooter incident and failed to respond as trained to an active shooter incident, and instead called for SWAT thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- c. After being advised that a child or children were injured in a class at Robb Elementary School failed to identify the incident as an active shooter incident and failed to respond as trained to an active shooter incident and instead directed law enforcement officers to evacuate the wing before confronting the shooter thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.

- d. Failing to enforce an active shooter response plan developed by the Uvalde Consolidated Independent School District by evacuating students before stopping an active shooter thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- e. Failing to follow active shooter training he received by deciding and declaring to others to delay breaching a room occupied by a gunman at Robb Elementary School until classrooms were evacuated thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- f. Deciding to negotiate and attempting to negotiate with a gunman in Rooms 111 and 112 of Robb Elementary School while the gunman was engaged in an active shooter incident thereby delaying the response by law enforcement officers to a gunman who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- g. Failing to determine if the door to classroom 111 at Robb Elementary School was locked thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- h. Failing to timely provide keys and breaching tools to enter classrooms 111 and 112 of Robb Elementary School, thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.



- i. Failing to follow an active shooter response policy developed by the Uvalde Consolidated Independent School District by failing to establish a command center and failing to direct others to establish a command center thereby leaving law enforcement officers and Border Patrol agents without clear information or direction regarding the active shooter incident at Robb Elementary School, thereby delaying the response by law enforcement officers and Border Patrol agents to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- j. Failing to develop an immediate action plan, direct others to develop an immediate action plan, and communicate to others an immediate action plan to respond to a gunman in the event the gunman resumed shooting in rooms 111 and 112 of Robb Elementary School thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Rooms 111 and 112 at Robb Elementary School.

And the said Defendant did not voluntarily deliver the child or children named above to a designated emergency infant care provider under Section 262.302, Family Code.

### **COUNT X**

AND IT IS FURTHER PRESENTED that **PETE ARREDONDO** hereinafter styled the Defendant, on or about the 24<sup>th</sup> day of May, 2022, and before the presentment of this indictment, in the County and State aforesaid, as a peace officer and Police Chief of Uvalde Consolidated Independent School District, and while incident commander of an incident involving an active shooter on a school campus which was under his control, to wit: Robb Elementary School in Uvalde, Texas, by act and omission, intentionally, knowingly, recklessly and with criminal

negligence placed Mayah Zamora, a child younger than 15 years of age, in imminent danger of bodily injury, death, physical impairment and mental impairment, by engaging in one or more of the following acts or omissions:

- a. After hearing shots being fired in a room at Robb Elementary School, failed to identify the incident as an active shooter incident, failed to respond as trained to an active shooter incident, and instead called for SWAT thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- b. After hearing shots being fired in a room at Robb Elementary School and after being advised that a teacher had been shot, failed to identify the incident as an active shooter incident and failed to respond as trained to an active shooter incident, and instead called for SWAT thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- c. After being advised that a child or children were injured in a class at Robb Elementary School failed to identify the incident as an active shooter incident and failed to respond as trained to an active shooter incident and instead directed law enforcement officers to evacuate the wing before confronting the shooter thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- d. Failing to enforce an active shooter response plan developed by the Uvalde Consolidated Independent School District by evacuating students before stopping an active shooter thereby delaying the response by law enforcement officers to an active

shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.

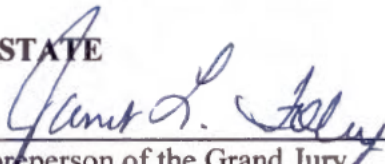
- e. Failing to follow active shooter training he received by deciding and declaring to others to delay breaching a room occupied by a gunman at Robb Elementary School until classrooms were evacuated thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- f. Deciding to negotiate and attempting to negotiate with a gunman in Rooms 111 and 112 of Robb Elementary School while the gunman was engaged in an active shooter incident thereby delaying the response by law enforcement officers to a gunman who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- g. Failing to determine if the door to classroom 111 at Robb Elementary School was locked thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- h. Failing to timely provide keys and breaching tools to enter classrooms 111 and 112 of Robb Elementary School, thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.
- i. Failing to follow an active shooter response policy developed by the Uvalde Consolidated Independent School District by failing to establish a command center and failing to direct others to establish a command center thereby leaving law

enforcement officers and Border Patrol agents without clear information or direction regarding the active shooter incident at Robb Elementary School, thereby delaying the response by law enforcement officers and Border Patrol agents to an active shooter who was hunting and shooting a child or children in Room 112 at Robb Elementary School.

- j. Failing to develop an immediate action plan, direct others to develop an immediate action plan, and communicate to others an immediate action plan to respond to a gunman in the event the gunman resumed shooting in rooms 111 and 112 of Robb Elementary School thereby delaying the response by law enforcement officers to an active shooter who was hunting and shooting a child or children in Rooms 111 and 112 at Robb Elementary School.

And the said Defendant did not voluntarily deliver the child or children named above to a designated emergency infant care provider under Section 262.302, Family Code.

**AGAINST THE PEACE AND DIGNITY OF THE STATE**

  
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Foreperson of the Grand Jury

Filed on June 26, 2024, by Christina Ovalle, Clerk of the 38<sup>th</sup> Judicial District Court, of Uvalde County, Texas at 3:03 P. M.

By: Christina J. Ovalle, District Clerk

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WITNESS: JOSE M. SANCHEZ