

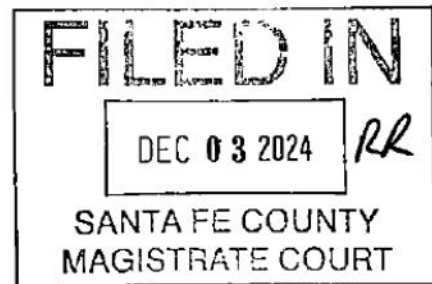
IN THE MAGISTRATE COURT  
COUNTY OF SANTA FE  
STATE OF NEW MEXICO

STATE OF NEW MEXICO,  
Plaintiff,

vs.

CARRIZALES, LEE  
DOB: 08/11/1960  
SSN: [REDACTED]  
ADD: [REDACTED]

Defendant



NO. M-49-MR-2024-00700

### STATEMENT OF PROBABLE CAUSE

The State requests the above defendant be noticed in for arraignment for the following reasons (set forth a plain, concise and definitive statement of the facts establishing probable cause):

The defendant was employed with Pacifica Senior Living, a facility located in Santa Fe, New Mexico as a personal care assistant/caregiver. The defendant completed numerous training courses on how to care for residents of a facility. Many of the training courses had signature blocks acknowledging receipt of the documents and training; the defendant signed those documents admitting she received the training. Some of the titles of the training the defendant received are: "Alzheimer's and Dementia: Tips for Better Communication," "Understanding the Different Types of Dementia," "Importance of Customer Service," and the Employee Handbook. The Resident's Bill of Rights was also a covered topic during the training program.

Pacifica Senior Living has two areas of living. One is the Assisted Living side, where the residents can care for themselves with minimal/some assistance; it is not secured allowing the residents to leave the property if those chose. The other side of Pacifica Senior Living is a Memory Care Unit. The Memory Care Unit is a secure building next to the Assisted Living side. A numerical code is required to enter or exit the building. The building is secured for the safety and protection of the Memory Care residents therefore the residents do not have access to the code. These residents are in different stages of memory loss requiring intensive, specialized care in a long-term care setting.

A video recorded on January 7, 2024, shows the defendant yelling, in an aggressive manner, in the face of A. M. while A. M. was seated in her wheelchair in the dining room area of the Memory Care Unit at Pacifica Senior Living. This is a summary of what is said by the defendant in the video, "Stop your fucking crying already. Stop it! I'm not [indecipherable] any more today. You're on your own now, I'm not dealing with you anymore." A.M. was an established resident of the Memory Care Unit at Pacifica Senior Living on January 7, 2024. A. M. has bad short term memory recall. When interviewed A.M. could not recall the incident and seemed confused.

A second video recorded on January 7, 2024, shortly after the above-mentioned video, shows the defendant yelling and cursing at E. M. in an aggressive manner, while E. M. was in the common area of the Memory Care Unit at Pacifica Senior Living. This is a summary of what is said by the defendant in the video, "Fuck you. Fuck you. That's what you said to me earlier. Don't come and tell me nothing. You're not a nice lady, go away. Going to church, what a hypocrite." E. M. was an established resident of the Memory Care Unit at Pacifica Senior Living. When interviewed E.M. stated the incident caused them to be scared of the defendant.

A review of the defendant's personnel file shows the defendant was on the clock, working, at Pacifica Senior Living on January 7, 2024; check stubs confirm the defendant was paid for working that day.

The person who recorded the incidents was interviewed and confirmed the defendant was verbally abusing the two residents on Sunday January 7, 2024, while the residents were in the Memory Care Unit at the Pacifica Senior Living facility in Santa Fe, New Mexico.

*I do solemnly declare and affirm under penalty of perjury that the matters and facts set forth in this statement are true to the best of my knowledge, information and belief.*

12/03/24  
Date

  
\_\_\_\_\_  
Jessica Carabajal, Special Agent  
Charging Officer

If Probable Cause Determination  
Required: Probable Cause Found \_\_\_;  
Not Found \_\_\_ (If not found, complaint  
dismissed & defendant released)  
Judge: \_\_\_\_\_ Date: \_\_\_\_\_

(Committee Approved Draft, District Court Criminal 10/01/91, Courts Limited Jur. 11/15/91)