

WARRANT TYPE: ARREST WARRANT
AWPS#: 18000198
COURT CASE NUMBER:

CASE TYPE: FELONY
REFILE INDICATOR:
DIVISION:

TO ALL AND SINGULAR SHERIFFS OF THE STATE OF FLORIDA, GREETINGS:
YOU ARE HEREBY COMMANDED TO IMMEDIATELY ARREST THE DEFENDANT AND BRING HIM OR
HER BEFORE ME, A JUDGE IN THE 11TH JUDICIAL CIRCUIT OF FLORIDA, TO BE DEALT
WITH ACCORDING TO LAW:

DEFENDANT'S NAME: PLA
LAST RONALD FIRST MIDDLE TTL

AKA(S):
STR/APT/CITY/ST/ZIP: 4757 SW 146TH AVE / / MIAMI / FL/ 331756892
DOB: 09/18/1990 RACE: W SEX: M HEIGHT: WEIGHT: HAIR: EYES:
SOC SEC #: XXX-XX-XXXX CIN #: SID #: FBI #: IDS #: 3197085
SCARS, MARKS, TATTOOS:
DRIVERS LICENSE #: STATE: FL
VEH TAG #: STATE: MAKE: MODEL: YEAR: COLOR:
COMMENTS:

PROBATION:

BEFORE ME PERSONALLY CAME HALL, SEAN G (AFFIANT) WHO, BEING DULY
SWORN, STATES THAT THE DEFENDANT ** PLA, RONALD **, DID COMMIT THE
ACTS STATED IN THE ATTACHED STATEMENT OF FACTS. BASED UPON THIS SWORN STATEMENT
OF FACTS, I FIND PROBABLE CAUSE THAT ** PLA, RONALD ** DID COMMIT
THE CRIME(S) OF:
F 2 782.071(1)(A) VEHICULAR HOMICIDE/RECKLESS MANNER

IN DADE COUNTY, FLORIDA, CONTRARY TO FLORIDA STATUTES AND AGAINST THE PEACE AND
DIGNITY OF THE STATE OF FLORIDA.
POLICE CASE #: 71601068 AGENCY: FLORIDA HIGHWAY PATROL
ASSISTANT STATE ATTORNEY: ADAMS, LAURA UNIT: 052

EXTRADITE INFORMATION

EXTRADITION CODE: 1 - FELONY - FULL EXTRADITION UNLESS OTHERWISE NOTED IN MIS FIEL
EXTRADITION MAY BE CONFIRMED WITH THE METRO-DADE POLICE DEPARTMENT, DADE COUNTY
** IN ANY EVENT, DEFENDANT WILL BE ARRESTED IF FOUND IN THE STATE OF FLORIDA **

SWORN TO BY AFFIANT HALL, SEAN G COURT ID 031- 516
SO ORDERED THIS DAY OF

March 2018

[Signature]

\$10,000⁰⁰
BOND AMOUNT

JUDGE IN THE 11TH JUDICIAL CIRCUIT IN AND FOR DADE COUNTY FLA
() FIRST APPEARANCE JUDGE MAY NOT MODIFY CONDITION OF RELEASE
(RULE 3.131(D)(1) (D))

No Drive ORDER

() TO ANSWER UNTO THE STATE OF FLORIDA ON AN INFORMATION OR INDICTMENT
FILED AGAINST HIM OR HER BY THE STATE ATTORNEY FOR THE CHARGE(S) OF:
() UPON ORDER OF A JUDGE IN THE ELEVENTH JUDICIAL CIRCUIT OF FLORIDA FOR
FAILURE TO APPEAR IN COURT TO ANSWER THE PENDING CHARGE(S) FOR THE
CHARGE(S) OF:

HARVEY RUVIN, CLERK OF THE COURT

BY

DEPUTY CLERK

DATE

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT IN AND FOR MIAMI-DADE COUNTY, FLORIDA

STATE OF FLORIDA)

COUNTY OF MIAMI-DADE)


STATEMENT OF FACTS IN SUPPORT OF ARREST WARRANT

Before me, Lourdes SIMON, a Judge of the Circuit Court of the Eleventh Judicial Circuit in and for Miami-Dade County, Florida, personally appeared Master Corporal Sean G. Hall 31-516, who being by me first duly sworn, deposes and says that he has probable cause to arrest RONALD NICHOLAS PLA for the offense of (1) count of Vehicular Homicide in violation of Florida State Statute 782.071(1) (A).

Your Affiant, Master Corporal Sean G. Hall, is a State Trooper with the Florida Highway Patrol. Your Affiant has been a State Trooper since January 08, 1990 (28 years) and has worked on approximately one thousand traffic crash scenes. Your Affiant is currently assigned to the rank of Master Corporal in the Traffic Homicide Investigative section of the Florida Highway Patrol for the past 14 years. Your Affiant has investigated over one hundred and fifty five Traffic Homicide Fatalities.

Your Affiant was assigned as the lead investigator in a fatal traffic crash that occurred on November 01, 2016 at approximately 1:42 P.M., on eastbound State Road #90 (also known as S.W. 8th Street) at the intersection of S.W. 137th Avenue, in Miami-Dade County, Florida. The crash involved a motor vehicle driven by Ronald Nicholas Pla, W/M, DOB 09/18/1990, Florida Driver's License Number [REDACTED] (hereinafter "the Defendant") and a marked, City of Miami Police Department police motorcycle driven by Jorge Sanchez, W/M, Date of Birth 02/09/1963 (hereinafter "the Victim"). There were other vehicles that were also involved in this crash, but the occupants of those vehicles did not sustain serious injuries. The Florida Highway Patrol Case Number assigned to this fatality is FHP716-01-068.

In the course of this investigation, your Affiant learned the following information: at approximately 1:42 P.M. on Tuesday, November 01, 2016, the Defendant was operating a white, 2013 Infiniti G37 4-door sedan, with VIN number of JN1CV6AP2DM721256. This vehicle (hereinafter "Vehicle-1") was traveling eastbound on State Road #90 toward the intersection of S.W. 137th Avenue. At that time, the Victim was on his motorcycle, either stopped or slowing to a near-stop for the red light for eastbound traffic on State Road #90 at the intersection with S.W. 137th Avenue. This is a very busy intersection, with many cars that travel through it, especially at that time of the day.

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The Defendant apparently had a [REDACTED] while he was driving the Infiniti and as a result, lost control of the vehicle. The Defendant's foot pressed down on the accelerator pedal causing it to speed up as it approached the intersection of S.W. 137th Avenue, despite the fact that there were vehicles stopped both eastbound and westbound for the red light. According to the crash data recorder, the Defendant's vehicle was traveling at 116 miles per hour at the time of this collision.

The Defendant hit the Victim's motorcycle from behind; the Victim was projected from his motorcycle and landed on the eastern portion of the intersection. The Victim's motorcycle also slid to the eastern portion of the intersection. After colliding with the Victim and his motorcycle, the Defendant's vehicle continued travelling eastbound, and he struck several other vehicles before the vehicle finally came to a stop.

The Victim was transported by fire rescue to Kendall Regional Hospital with traumatic injuries and in cardiac arrest. All advanced cardiac life support efforts were met with negative results. At 2:19 p.m., the Victim was pronounced deceased. According to the Medical Examiner's Office, the cause of death was blunt trauma from the motor vehicle collision.

The Defendant was also transported to Kendall Regional Hospital, and was treated for non-life-threatening injuries. The Defendant signed a consent for the voluntary withdrawal of his blood for testing. While at the hospital observing the Defendant, Trooper Bill Smith, noted that the Defendant apparently was having a [REDACTED]. Blood samples were collected from the Defendant while he was at the hospital at the request of law enforcement at 5:00 p.m. These samples were submitted to the University of Miami Forensic Toxicology Laboratory for analysis. According to the forensic toxicology laboratory report, the Defendant had 4.7 nanograms per milliliter of tetrahydrocannabinol (also known as THC) in his system, which is the chemical component of cannabis that causes the drug's psychological effects. Dr. Lisa Reidy, the Director of the toxicology laboratory, indicated that the amount of THC in the Defendant's system is consistent with recent ingestion of cannabis. In addition, the Defendant had [REDACTED] and [REDACTED] in his system, as well as metabolites for [REDACTED]. These three substances are consistent with the Defendant having taken [REDACTED] which is a drug used to treat [REDACTED] disorders.


Your Affiant obtained a search warrant to seize the vials of blood that were collected from the Defendant at or near the time of his admission to the hospital (approximately 2:00 p.m. on November 1, 2016). Those blood vials were also submitted to the University of Miami Forensic Toxicology Laboratory for analysis. Those vials revealed that the Defendant had 6.8 nanograms per milliliter of THC in this system, an even higher amount than what he had when his blood was drawn at the direction of law enforcement at 5:00 p.m. The "hospital blood" vials also tested positive for the presence of [REDACTED] and [REDACTED].


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It should be noted that at the time of the crash, the Defendant had an adult male passenger named Abraham Miranda in his vehicle with him. Mr. Miranda provided a sworn statement after the crash. Mr. Miranda stated that he was the right front passenger of Vehicle-1 which was being driven by Mr. Ronald Pla. Mr. Miranda also stated that he was at the residence of Mr. Pla when they decided to go to Dolphin Mall to eat a meal. Mr. Miranda further stated that he and the Defendant were traveling northbound on S.W. 147th Avenue and made a right turn onto S.W. 8th Street. Mr. Miranda then stated that they were going to make a left turn onto S.W. 137th Avenue to get to N.W. 12 Street for the location of the mall. Mr. Miranda also stated they were traveling within the center lane on State Road #90 at approximately 40 miles per hour.

Mr. Miranda further stated that as they were traveling eastbound, he heard the vehicle accelerate, and that they were going faster and faster; then he noticed that they were approaching other vehicles. Mr. Miranda stated that the Defendant was not responding to him calling him, and that the Defendant wouldn't respond, so Mr. Miranda, reached over and grabbed the steering wheel. Mr. Miranda also stated they were crossing S.W. 142nd Avenue when he began to control the car. Mr. Miranda stated that the Defendant was awake physically, but mentally was just in a stare. Mr. Miranda stated that the car began to spin and they hit several cars. Mr. Miranda further stated he was trying his best to control the car after it seemed that the Defendant's foot was stuck on the accelerator. Mr. Miranda also stated that after the collision the car came to rest on its right side. Mr. Miranda stated that the Defendant was still unresponsive when he kept trying to call his name. Mr. Miranda then stated that several people assisted them to exit the vehicle, and that after the collision they were both sitting on the shoulder and that at that time, the Defendant was still disoriented, not knowing what happened or where he was at. Mr. Miranda also stated that he thought maybe they had collided into 4-5 other vehicles. Mr. Miranda then stated he was aware that the Defendant had what he called "silent [REDACTED] where he just freezes," and that he has witnessed these [REDACTED] in the past. Mr. Miranda stated that when the Defendant wakes-up from the [REDACTED] that he is confused and disorientated afterward. Mr. Miranda also stated that prior to the trip he thought he had smelled marijuana on the Defendant when he arrived at his home, but could not confirm if the Defendant had smoked it prior to him arriving.

The Defendant was also interviewed at the hospital on the day of the crash. He was advised of his Miranda rights, and acknowledged that he understood his rights. He agreed to speak with Corporal Rudy Regis about what had happened earlier that day. In his statement, the Defendant said he and his friend Abraham were traveling east on S.W. 8th Street and were going to make a left on S.W. 137th Avenue to go to a restaurant in the Dolphin Mall to eat a meal. The Defendant also stated that prior to the crash, he was coming from the CVS Pharmacy from picking up medication for his headaches. The Defendant further stated that his doctor had called in a new prescription for his headaches. The Defendant also stated that he was traveling approximately 40 miles per hour when he remembered getting hit in the back; that he passed out, and woke-up not knowing what was happening. The Defendant further stated that the medication he had taken did not have any restrictions on driving. The Defendant also stated that

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he had taken this medication in the morning prior to the crash. Mr. Pla then stated that the medication was for [REDACTED] and that he needed to take two pills a day to prevent the [REDACTED]

On June 16, 2017, the Defendant signed a Consent for release of his medical records, and the Defendant's attorney provided the Consent form to the Office of the State Attorney. The State Attorney's Office issued a subpoena for the Defendant's medical records to the Sunrise Medical Group, which is a practice that specializes in neurology. A review of the Defendant's medical records revealed that the Defendant was in a motor vehicle accident in 2012. In that crash, the Defendant lost consciousness for a brief period of time, and after that, he developed headaches which eventually stopped. However, he began to experience [REDACTED] during which he would have a blank stare, have slurred speech and would become confused. The Defendant's family also noticed that he would have mild jerky movements on the left side of his face and in his left arm. In early June of 2014, the Defendant went to the hospital for these symptoms, and he was prescribed a medication called [REDACTED] which helps to treat [REDACTED]. The Defendant was referred to Dr. Veena Subramanian, M.D., who is a neurologist, for treatment.

According to Dr. Subramanian's records, when the defendant went to see her on July 8, 2014, the defendant reported that his symptoms of a [REDACTED] disorder first appeared approximately six (6) months prior to that date. He reported that he would have episodes "when he has a blank stare and then the speech becomes slurred and he becomes little [sic] bit confused." He reported that his family had noticed that he had "some mild jerky movements in the left side of the face and the left arm." The defendant indicated that the episodes would last only around 30 seconds, and would then resolve and he would be fine when the episode was over. During that appointment, Dr. Subramanian advised the defendant to continue on [REDACTED] but she wrote that "I have asked him not to drive until six months from the [REDACTED] in June."

The defendant returned to Dr. Subramanian on August 29, 2014 and the doctor noted at that time: "At this point, his last [REDACTED] was in June. I will see him back in December and if at that [sic] point he has not had any breakthrough [REDACTED] we can release him for driving."

When the defendant returned to her again on December 8, 2014, the doctor wrote that "He seems to be doing well on the current regimen. We will continue the same and see him back in routine follow-up in around six months. He has been [REDACTED] free for six months at this point and hence I have told him that it will be okay for him to start driving, but really try to avoid it unless if absolutely needed."

Thus, based upon these medical records, it is clear that the defendant was advised on multiple occasions that he may not drive unless he is [REDACTED] free for at least six (6) months.

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Medical records from Dr. Subramanian in 2016 provide additional information about the defendant's treatment. On January 20, 2016, the defendant was seen by the doctor and she noted that he was doing "very well from a [REDACTED] standpoint. We will continue the same regimen and see him back in routine follow up in around six months." The defendant's treatment regimen including taking [REDACTED] and [REDACTED] to prevent [REDACTED]

Although the defendant was supposed to return to Dr. Subramanian within approximately six (6) months from his January 20, 2016 appointment date, he did not return to her office until September 20, 2016. At that time, he said he "stopped taking his medications [REDACTED] and [REDACTED] because he could not afford them." The defendant reported that "His mother has noticed that he has one breakthrough [REDACTED] where his arms went up 1 the air and he was drooling from his mouth." The doctor wrote that "the patient seems to have no awareness of this, and that "his brother apparently noted a few others [REDACTED] too." The doctor noted that the defendant had been off his prescribed medications for three (3) months, and that she would start him on a medication called [REDACTED]. She advised him to return in one month to see how he was doing. That was the last time the defendant saw his neurologist before the crash which killed Officer Sanchez, because although he had been told to return in one month, the defendant did not return on October 20, 2016. Rather, he did not return to see her until November 2, 2016, the day after the fatal crash.

According to Dr. Subramanian's reports, when the defendant returned to see her on November 2, 2016, he advised that after his last appointment (in September 2016) he started taking [REDACTED] and said he was doing "really well and had not had any [REDACTED]" He told the doctor that he did not know exactly how the crash happened. He told her "his friend was with him and he thought that he had a blank stare on the face right before [the crash] happened." He advised that after the crash, he was taken to the hospital and "they apparently noticed that he had another episode that looked like it could have been a [REDACTED]" Dr. Subramanian noted that it appeared that the defendant had at least two (2) breakthrough [REDACTED] the day before. She also added an additional medication for him to take, and wrote as follows: "I have also asked him to refrain from driving for at least six months, as has previously been discussed with him that he cannot drive unless he has been [REDACTED] free for 6 months and is compliant with his medications."

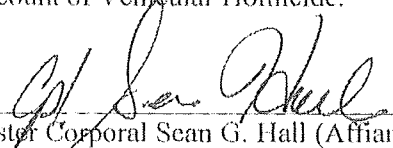
On February 1, 2018, your Affiant and Assistant State Attorney Laura Adams personally met with Dr. Subramanian to discuss the defendant's medical records. The doctor confirmed that she had been treating the defendant since 2014 and that on multiple occasions she told him he could not drive a car unless he was [REDACTED] free for at least six (6) months. She confirmed that based on the defendant's own reports, he had not been [REDACTED] free for at least six months on November 1, 2016 (the date of the crash) because as recently as September 2016, he was reportedly having break-through [REDACTED]. She confirmed that she started the defendant on a new medication regimen in September of 2016, and that she told him to return to see her in one month, but that he did not do so until the day after the crash (on November 2, 2016). She said

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that under these circumstances, in her expert medical opinion, the defendant should never have been driving on November 1, 2016 and that he was on notice of that fact.


On November 1, 2016, this defendant drove a motor vehicle, despite the fact that he knew he had a [REDACTED] disorder; and he had been told multiple times not to drive unless he had been [REDACTED]-free for at least six (6) months; that he had stopped taking medications which were prescribed for him approximately in June of 2016 and did not see his doctor until September 2016; that he had [REDACTED] as recently as September 2016; and that he started a new medication regimen in September 2016 and was told to return to his doctor in one month, but he did not do so. It was entirely foreseeable in light of the defendant's medical history and new medication regimen that he would have a [REDACTED] on November 1, 2016. The defendant's decision to drive a motor vehicle on November 1, 2016 in the afternoon in a location, which is very heavily travelled, for a non-emergency reason, showed a willful and wanton disregard for the safety of others on the roadway. Officer Jorge Sanchez was killed as a result of the defendant's reckless decision to drive under those circumstances.

WHEREFORE, for the foregoing reasons, your affiant requests that a warrant for the arrest of Ronald Nicholas Pla be issued for (1) count of Vehicular Homicide.


Master Corporal Sean G. Hall (Affiant)

WITNESS MY HAND and seal this the 2 day of March, 2018.


JUDGE OF THE CIRCUIT COURT
OF THE ELEVENTH JUDICIAL
CIRCUIT OF FLORIDA


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Judge's initials