

IN THE CIRCUIT COURT FOR THE TWELFTH JUDICIAL CIRCUIT  
IN AND FOR SARASOTA COUNTY, FLORIDA

STATE OF FLORIDA

CLERK NO: 2024CF005337NC  
DIVISION: 2

E Filed  
6-13-24

vs

**NICOLE ELIZABETH ROBERTS**  
RACE/SEX: B/F DOB: 08/26/1994

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**INFORMATION FOR:**

- 1) PRINCIPAL TO MURDER IN THE SECOND DEGREE WITH A FIREARM 782.04(2); 775.087; 777.011, FIRST PUNISHABLE BY LIFE FELONY
- 2) TAMPERING WITH EVIDENCE 918.13, THIRD DEGREE FELONY

In the Name and by Authority of the State of Florida:

Ed Brodsky, State Attorney of the Twelfth Judicial Circuit of the State of Florida, by and through his undersigned Assistant State Attorney, prosecuting for the State of Florida in the Circuit Court in and for the County of Sarasota, Florida, under oath information makes that:


**COUNT 1:** NICOLE ELIZABETH ROBERTS, on or about May 18, 2024 in SARASOTA County, Florida, did act as a principal by helping another person or persons, to-wit: DARRYL BERNARD BROOKINS, JR. with a conscious intent that the criminal act be done, and did some act or said some word which was intended to and which did incite, cause, encourage, assist or advise the other person or persons to unlawfully, by an act imminently dangerous to another and evincing a depraved mind regardless of human life, although without any premeditated design to effect the death of any particular individual, kill one TOMMIE LEE BATTIE IV, a human being, by SHOOTING HIM WITH A FIREARM, and during the commission of said offense, the defendant, as a principal, possessed a firearm, and in the commission of the offense the defendant, as a principal, did discharge a firearm and as a result of the discharge, death was inflicted upon TOMMIE LEE BATTIE IV, contrary to Section 782.04(2), 775.087 and 777.011, Florida Statutes, in such case made, and provided and against the peace and dignity of the State of Florida.

**COUNT 2:** NICOLE ELIZABETH ROBERTS, on or about May 18, 2024 in SARASOTA County, Florida, did knowingly and unlawfully, while knowing that a criminal trial or proceeding or an investigation by a duly constituted prosecuting authority, law enforcement agency, grand jury or legislative committee of this state, to wit: SARASOTA COUNTY SHERIFF'S OFFICE, was pending or about to be instituted, did alter, destroy, conceal or remove physical evidence, to wit: FIREARM, with the purpose to impair its verity or availability in such investigation, contrary to Section 918.13, Florida Statutes, in such case made, and provided and against the peace and dignity of the State of Florida.

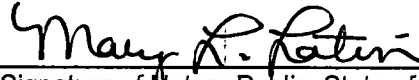
STATE OF FLORIDA  
COUNTY OF SARASOTA

Personally appeared before me, Ed Brodsky, the undersigned State Attorney of the Twelfth Judicial Circuit of the State of Florida, in and for Sarasota County, or his duly designated Assistant State Attorney, who being duly sworn, says the allegations in the foregoing information are based upon facts that have been sworn to as true, and which, if true, would constitute the offense therein charged, and that this information is filed in good faith in instituting this prosecution and that testimony was received under oath from a material witness or witnesses.

ED BRODSKY, STATE ATTORNEY  
TWELFTH JUDICIAL CIRCUIT

BY:   
KAREN FRAIVILLIG  
Assistant State Attorney  
FL Bar#: 569739  
(941) 861-4435  
E-service: saorounds@sao12.org

The foregoing instrument was acknowledged before me by means of  physical presence or  online notarization, this 13<sup>th</sup> day of June, 2024 by KAREN FRAIVILLIG who is personally known to me to be an Assistant State Attorney for the Twelfth Judicial Circuit and who did take an oath.

  
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Signature of Notary Public, State of Florida

Agency No: 2024-SSO-045115  
Arrested: 05/31/2024  
OBTS No.: 5801319709  
Booking No: 2024-005250  
Return Date: Friday, July 12, 2024  
Clerk Notes:

