

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
MACON DIVISION**

UNITED STATES OF AMERICA	:	INDICTMENT
	:	
v.	:	CRIMINAL NO. 5:22-CR-<u>53</u>
	:	
ZHANAY KIANA FLYNN, ANTANESHA MONE FRITZ, and LATONA MAE LAMBERT	:	VIOLATIONS:
	:	
	:	18 U.S.C. § 7(3)
	:	18 U.S.C. § 13
	:	18 U.S.C. § 2258
	:	34 U.S.C. § 20341
	:	O.C.G.A. § 16-5-70(b)
	:	O.C.G.A. § 16-5-70(c)
	:	O.C.G.A. § 16-5-23(a)(1)
	:	O.C.G.A. § 16-2-20

THE GRAND JURY CHARGES:

**COUNTS ONE THROUGH EIGHTEEN
(CRUELTY TO CHILDREN IN THE FIRST DEGREE)**

COUNT ONE

On or about January 6, 2021, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

ZHANAY KIANA FLYNN and ANTANESHA MONE FRITZ,

Defendants herein, while located on Robins Air Force Base, on land acquired for the use of the United States and under the exclusive and concurrent jurisdiction thereof, individually and as parties concerned in the commission of a crime, did commit the offense of Cruelty to Children in the First Degree, in that Defendants did maliciously cause Minor Victim 1, Minor Victim 3, and Minor Victim 8, each one a child under the age of eighteen years, cruel and excessive physical and mental pain by striking Minor Victim 8 in the face, and by causing Minor Victim 1 and Minor Victim 3 to fight with and strike and injure one another and by failing to protect said children in

violation of Sections 16-5-70(b) and 16-2-20 of the Official Code of Georgia Annotated and Title 18, United States Code, Sections 7(3) and 13.

COUNT TWO

On or about January 6, 2021, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

ZHANAY KIANA FLYNN and ANTANESHA MONE FRITZ,

Defendants herein, while located on Robins Air Force Base, on land acquired for the use of the United States and under the exclusive and concurrent jurisdiction thereof, individually and as parties concerned in the commission of a crime, and at a time other than that alleged in Count One, did commit the offense of Cruelty to Children in the First Degree, in that Defendants did maliciously cause Minor Victim 4, a child under the age of eighteen years, cruel and excessive physical and mental pain by spraying said child in the face with a cleaning liquid, in violation of Sections 16-5-70(b) and 16-2-20 of the Official Code of Georgia Annotated and Title 18, United States Code, Sections 7(3) and 13.

COUNT THREE

On or about January 7, 2021, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

ZHANAY KIANA FLYNN and ANTANESHA MONE FRITZ,

Defendants herein, while located on Robins Air Force Base, on land acquired for the use of the United States and under the exclusive and concurrent jurisdiction thereof, individually and as parties concerned in the commission of a crime, did commit the offense of Cruelty to Children in the First Degree, in that Defendants did maliciously cause Minor Victim 2, a child under the age of eighteen years, cruel and excessive physical and mental pain by seizing said child and shaking

said child and threatening to strike said child, in violation of Sections 16-5-70(b) and 16-2-20 of the Official Code of Georgia Annotated and Title 18, United States Code, Sections 7(3) and 13.

COUNT FOUR

On or about January 8, 2021, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

ZHANAY KIANA FLYNN and ANTANESHA MONE FRITZ,

Defendants herein, while located on Robins Air Force Base, on land acquired for the use of the United States and under the exclusive and concurrent jurisdiction thereof, individually and as parties concerned in the commission of a crime, did commit the offense of Cruelty to Children in the First Degree, in that Defendants did maliciously cause Minor Victim 3, a child under the age of eighteen years, cruel and excessive physical and mental pain by stepping on and applying weight to the leg of said child, in violation of Sections 16-5-70(b) and 16-2-20 of the Official Code of Georgia Annotated and Title 18, United States Code, Sections 7(3) and 13.

COUNT FIVE

On or about January 8, 2021, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

ZHANAY KIANA FLYNN and ANTANESHA MONE FRITZ,

Defendants herein, while located on Robins Air Force Base, on land acquired for the use of the United States and under the exclusive and concurrent jurisdiction thereof, individually and as parties concerned in the commission of a crime, and at a time other than that alleged in Count Four, did commit the offense of Cruelty to Children in the First Degree, in that Defendants did maliciously cause Minor Victim 1, Minor Victim 2, Minor Victim 3, Minor Victim 8, and Minor Victim 9, each one a child under the age of eighteen years, cruel and excessive physical and mental

pain by causing said children to fight with and strike and injure one another and by failing to protect said children, in violation of Sections 16-5-70(b) and 16-2-20 of the Official Code of Georgia Annotated and Title 18, United States Code, Sections 7(3) and 13.

COUNT SIX

On or about January 19, 2021, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

ZHANAY KIANA FLYNN and ANTANESHA MONE FRITZ,

Defendants herein, while located on Robins Air Force Base, on land acquired for the use of the United States and under the exclusive and concurrent jurisdiction thereof, individually and as parties concerned in the commission of a crime, did commit the offense of Cruelty to Children in the First Degree, in that Defendants did maliciously cause Minor Victim 1, Minor Victim 5, Minor Victim 8, and Minor Victim 9, each one a child under the age of eighteen years, cruel and excessive physical and mental pain by causing said children to fight with and strike and injure one another and by failing to protect said children, in violation of Sections 16-5-70(b) and 16-2-20 of the Official Code of Georgia Annotated and Title 18, United States Code, Sections 7(3) and 13.

COUNT SEVEN

On or about January 19, 2021, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

ZHANAY KIANA FLYNN and ANTANESHA MONE FRITZ,

Defendants herein, while located on Robins Air Force Base, on land acquired for the use of the United States and under the exclusive and concurrent jurisdiction thereof, individually and as parties concerned in the commission of a crime, and at a time other than that alleged in Count Six, did commit the offense of Cruelty to Children in the First Degree, in that Defendants did

maliciously cause Minor Victim 1, Minor Victim 3, Minor Victim 6, and Minor Victim 9, each one a child under the age of eighteen years, cruel and excessive physical and mental pain by causing said children to fight with and strike and injure one another and by failing to protect said children, in violation of Sections 16-5-70(b) and 16-2-20 of the Official Code of Georgia Annotated and Title 18, United States Code, Sections 7(3) and 13.

COUNT EIGHT

On or about January 19, 2021, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

ZHANAY KIANA FLYNN and ANTANESHA MONE FRITZ,

Defendants herein, while located on Robins Air Force Base, on land acquired for the use of the United States and under the exclusive and concurrent jurisdiction thereof, individually and as parties concerned in the commission of a crime, and at a time other than that alleged in Counts Six and Seven, did commit the offense of Cruelty to Children in the First Degree, in that Defendants did maliciously cause Minor Victim 1, Minor Victim 3, Minor Victim 6, and Minor Victim 9, each one a child under the age of eighteen years, cruel and excessive physical and mental pain by causing said children to fight with and strike and injure one another and by failing to protect said children, in violation of Sections 16-5-70(b) and 16-2-20 of the Official Code of Georgia Annotated and Title 18, United States Code, Sections 7(3) and 13.

COUNT NINE

On or about January 19, 2021, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

ZHANAY KIANA FLYNN and ANTANESHA MONE FRITZ,

Defendants herein, while located on Robins Air Force Base, on land acquired for the use of the United States and under the exclusive and concurrent jurisdiction thereof, individually and as parties concerned in the commission of a crime, and at a time other than that alleged in Counts Six, Seven, and Eight, did commit the offense of Cruelty to Children in the First Degree, in that Defendants did maliciously cause Minor Victim 6, Minor Victim 7, and Minor Victim 9, each one a child under the age of eighteen years, cruel and excessive physical and mental pain by causing said children to fight with and strike and injure one another and by failing to protect said children, including by seizing Minor Victim 9's hand and forcing him to strike Minor Victim 6 in the face, and by seizing Minor Victim 7's hand and forcing said child to strike Minor Victim 9 in the face, in violation of Sections 16-5-70(b) and 16-2-20 of the Official Code of Georgia Annotated and Title 18, United States Code, Sections 7(3) and 13.

COUNT TEN

On or about January 22, 2021, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

ZHANAY KIANA FLYNN and ANTANESHA MONE FRITZ,

Defendants herein, while located on Robins Air Force Base, on land acquired for the use of the United States and under the exclusive and concurrent jurisdiction thereof, individually and as parties concerned in the commission of a crime, did commit the offense of Cruelty to Children in the First Degree, in that Defendants did maliciously cause Minor Victim 9, a child under the age

of eighteen years, cruel and excessive physical and mental pain by striking Minor Victim 9 in the head with a book and by failing to protect said child, in violation of Sections 16-5-70(b) and 16-2-20 of the Official Code of Georgia Annotated and Title 18, United States Code, Sections 7(3) and 13.

COUNT ELEVEN

On or about January 22, 2021, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

ZHANAY KIANA FLYNN and ANTANESHA MONE FRITZ,

Defendants herein, while located on Robins Air Force Base, on land acquired for the use of the United States and under the exclusive and concurrent jurisdiction thereof, individually and as parties concerned in the commission of a crime, and at a time other than that alleged in Count Ten, did commit the offense of Cruelty to Children in the First Degree, in that Defendants did maliciously cause Minor Victim 1, Minor Victim 5, Minor Victim 7, and Minor Victim 9, each one a child under the age of eighteen years, cruel and excessive physical and mental pain by causing said children to fight with and strike and injure one another and by failing to protect said children, including by seizing Minor Victim 5's hand and forcing Minor Victim 5 to strike Minor Victim 7, and by using Minor Victim 5's body to strike Minor Victim 7, in violation of Sections 16-5-70(b) and 16-2-20 of the Official Code of Georgia Annotated and Title 18, United States Code, Sections 7(3) and 13.

COUNT TWELVE

On or about January 25, 2021, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

ZHANAY KIANA FLYNN and ANTANESHA MONE FRITZ,

Defendants herein, while located on Robins Air Force Base, on land acquired for the use of the United States and under the exclusive and concurrent jurisdiction thereof, individually and as parties concerned in the commission of a crime, did commit the offense of Cruelty to Children in the First Degree, in that Defendants did maliciously cause Minor Victim 3 and Minor Victim 9, each one a child under the age of eighteen years, cruel and excessive physical and mental pain by causing said children to fight with and strike and injure one another and by failing to protect said children, including spraying Minor Victim 3 in the face with a cleaning liquid, in violation of Sections 16-5-70(b) and 16-2-20 of the Official Code of Georgia Annotated and Title 18, United States Code, Sections 7(3) and 13.

COUNT THIRTEEN

On or about January 25, 2021, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

ZHANAY KIANA FLYNN and ANTANESHA MONE FRITZ,

Defendants herein, while located on Robins Air Force Base, on land acquired for the use of the United States and under the exclusive and concurrent jurisdiction thereof, individually and as parties concerned in the commission of a crime, and at a time other than that alleged in Count Twelve, did commit the offense of Cruelty to Children in the First Degree, in that Defendants did maliciously cause Minor Victim 1, Minor Victim 5, and Minor Victim 13, each one a child under the age of eighteen years, cruel and excessive physical and mental pain by causing said children

to fight with and strike and injure one another and by failing to protect said children, in violation of Sections 16-5-70(b) and 16-2-20 of the Official Code of Georgia Annotated and Title 18, United States Code, Sections 7(3) and 13.

COUNT FOURTEEN

On or about January 25, 2021, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

ZHANAY KIANA FLYNN and ANTANESHA MONE FRITZ,

Defendants herein, while located on Robins Air Force Base, on land acquired for the use of the United States and under the exclusive and concurrent jurisdiction thereof, individually and as parties concerned in the commission of a crime, and at a time other than that alleged in Counts Twelve and Thirteen, did commit the offense of Cruelty to Children in the First Degree, in that Defendants did maliciously cause Minor Victim 6, a child under the age of eighteen years, cruel and excessive physical and mental pain by pulling said child's hair and seizing him forcefully, in violation of Sections 16-5-70(b) and 16-2-20 of the Official Code of Georgia Annotated and Title 18, United States Code, Sections 7(3) and 13.

COUNT FIFTEEN

On or about January 25, 2021, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

ZHANAY KIANA FLYNN and ANTANESHA MONE FRITZ,

Defendants herein, while located on Robins Air Force Base, on land acquired for the use of the United States and under the exclusive and concurrent jurisdiction thereof, did individually and as parties concerned in the commission of a crime, and at a time other than that alleged in Counts Twelve, Thirteen, and Fourteen, commit the offense of Cruelty to Children in the First Degree, in

that Defendants did maliciously cause Minor Victim 4, a child under the age of eighteen years, cruel and excessive physical and mental pain by kicking said child and causing said child to fall and strike its head forcefully against a wall, in violation of Sections 16-5-70(b) and 16-2-20 of the Official Code of Georgia Annotated and Title 18, United States Code, Sections 7(3) and 13.

COUNT SIXTEEN

On or about January 26, 2021, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

ZHANAY KIANA FLYNN and ANTANESHA MONE FRITZ,

Defendants herein, while located on Robins Air Force Base, on land acquired for the use of the United States and under the exclusive and concurrent jurisdiction thereof, did individually and as parties concerned in the commission of a crime, and at a time other than that alleged in Count Fifteen, commit the offense of Cruelty to Children in the First Degree, in that Defendants did maliciously cause Minor Victim 1, Minor Victim 3, Minor Victim 5, Minor Victim 8, and Minor Victim 9, each one a child under the age of eighteen years, cruel and excessive physical and mental pain by causing said children to fight with and strike and injure one another and by failing to protect said children, in violation of Sections 16-5-70(b) and 16-2-20 of the Official Code of Georgia Annotated and Title 18, United States Code, Sections 7(3) and 13.

COUNT SEVENTEEN

On or about January 26, 2021, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

ZHANAY KIANA FLYNN and ANTANESHA MONE FRITZ,

Defendants herein, while located on Robins Air Force Base, on land acquired for the use of the United States and under the exclusive and concurrent jurisdiction thereof, did individually and as parties concerned in the commission of a crime, and at a time other than that alleged in Counts Fifteen and Sixteen, commit the offense of Cruelty to Children in the First Degree, in that Defendants did maliciously cause Minor Victim 4, a child under the age of eighteen years, cruel and excessive physical and mental pain by spraying said child in the face with a cleaning liquid, in violation of Sections 16-5-70(b) and 16-2-20 of the Official Code of Georgia Annotated and Title 18, United States Code, Sections 7(3) and 13.

COUNT EIGHTEEN

On or about February 10, 2021, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

ZHANAY KIANA FLYNN and ANTANESHA MONE FRITZ,

Defendants herein, while located on Robins Air Force Base, on land acquired for the use of the United States and under the exclusive and concurrent jurisdiction thereof, did individually and as parties concerned in the commission of a crime, commit the offense of Cruelty to Children in the First Degree, in that Defendants did maliciously cause Minor Victim 5, Minor Victim 6, Minor Victim 7, and Minor Victim 9, each one a child under the age of eighteen years, cruel and excessive physical and mental pain, by causing said children to fight with and strike and injure one another and by failing to protect said children, including by seizing the body of Minor Victim 5 and using

said child's legs to kick Minor Victim 9, and by seizing the wrists of Minor Victim 5 and forcing said child to strike Minor Victim 7 in the head, in violation of Sections 16-5-70(b) and 16-2-20 of the Official Code of Georgia Annotated and Title 18, United States Code, Sections 7(3) and 13.

COUNTS NINETEEN THROUGH TWENTY-FOUR
(CRUELTY TO CHILDREN IN THE SECOND DEGREE)

COUNT NINETEEN

On or about January 4, 2021, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

ZHANAY KIANA FLYNN and ANTANESHA MONE FRITZ,

Defendants herein, while located on Robins Air Force Base, on land acquired for the use of the United States and under the exclusive and concurrent jurisdiction thereof, did individually and as parties concerned in the commission of a crime, commit the offense of Cruelty to Children in the Second Degree, in that Defendants did with criminal negligence cause Minor Victim 2 and Minor Victim 5, each one a child under the age of eighteen years, cruel and excessive physical and mental pain, by causing said children to fight with and strike and injure one another and by failing to protect said children, in violation of Sections 16-5-70(c) and 16-2-20 of the Official Code of Georgia Annotated and Title 18, United States Code, Sections 7(3) and 13.

COUNT TWENTY

On or about January 6, 2021, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

ZHANAY KIANA FLYNN and ANTANESHA MONE FRITZ,

Defendants herein, while located on Robins Air Force Base, on land acquired for the use of the United States and under the exclusive and concurrent jurisdiction thereof, did individually and as parties concerned in the commission of a crime, and at a time other than that alleged in Count Two,

did commit the offense of Cruelty to Children in the Second Degree, in that Defendants did with criminal negligence cause Minor Victim 4, a child under the age of eighteen years, cruel and excessive physical and mental pain, by seizing the arm of said child and hoisting said child from the ground, in violation of Sections 16-5-70(c) and 16-2-20 of the Official Code of Georgia Annotated and Title 18, United States Code, Sections 7(3) and 13.

COUNT TWENTY-ONE

On or about January 19, 2021, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

ZHANAY KIANA FLYNN and ANTANESHA MONE FRITZ,

Defendants herein, while located on Robins Air Force Base, on land acquired for the use of the United States and under the exclusive and concurrent jurisdiction thereof, did individually and as parties concerned in the commission of a crime, and at a time other than that alleged in Counts Six, Seven, Eight, and Nine, commit the offense of Cruelty to Children in the Second Degree, in that Defendants did with criminal negligence cause Minor Victim 2, Minor Victim 8, and Minor Victim 9, each one a child under the age of eighteen years, cruel and excessive physical and mental pain, by causing said children to fight with and strike and injure one another and by failing to protect said children, in violation of Sections 16-5-70(c) and 16-2-20 of the Official Code of Georgia Annotated and Title 18, United States Code, Sections 7(3) and 13.

COUNT TWENTY-TWO

On or about January 21, 2021, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

ZHANAY KIANA FLYNN and ANTANESHA MONE FRITZ,

Defendants herein, while located on Robins Air Force Base, on land acquired for the use of the United States and under the exclusive and concurrent jurisdiction thereof, did individually and as parties concerned in the commission of a crime, commit the offense of Cruelty to Children in the Second Degree, in that Defendants did with criminal negligence cause Minor Victim 1, Minor Victim 3, and Minor Victim 9, each one a child under the age of eighteen years, cruel and excessive physical and mental pain, by causing said children to fight with and strike and injure one another and by failing to protect said children, in violation of Sections 16-5-70(c) and 16-2-20 of the Official Code of Georgia Annotated and Title 18, United States Code, Sections 7(3) and 13.

COUNT TWENTY-THREE

On or about January 22, 2021, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

ZHANAY KIANA FLYNN and ANTANESHA MONE FRITZ,

Defendants herein, while located on Robins Air Force Base, on land acquired for the use of the United States and under the exclusive and concurrent jurisdiction thereof, did individually and as parties concerned in the commission of a crime, and at a time other than that alleged in Counts Ten and Eleven, commit the offense of Cruelty to Children in the Second Degree, in that Defendants did with criminal negligence cause Minor Victim 8, a child under the age of eighteen years, cruel and excessive physical and mental pain, by throwing a hard item at Minor Victim 8,

and striking said child's hand, in violation of Sections 16-5-70(c) and 16-2-20 of the Official Code of Georgia Annotated and Title 18, United States Code, Sections 7(3) and 13.

COUNT TWENTY-FOUR

On or about January 25, 2021, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

ZHANAY KIANA FLYNN and ANTANESHA MONE FRITZ,

Defendants herein, while located on Robins Air Force Base, on land acquired for the use of the United States and under the exclusive and concurrent jurisdiction thereof, did individually and as parties concerned in the commission of a crime, and at a time other than that alleged in Counts Twelve, Thirteen, Fourteen, and Fifteen, commit the offense of Cruelty to Children in the Second Degree, in that Defendants did with criminal negligence cause Minor Victim 3, a child under the age of eighteen years, cruel and excessive physical and mental pain, by pushing Minor Victim 3 to the ground and causing said child to strike its face on a hard item and by then punishing said child for crying by forcing said child into a small enclosure, in violation of Sections 16-5-70(c) and 16-2-20 of the Official Code of Georgia Annotated and Title 18, United States Code, Sections 7(3) and 13.

COUNTS TWENTY-FIVE THROUGH TWENTY-SEVEN
(SIMPLE BATTERY)

COUNT TWENTY-FIVE

On or about January 4, 2021, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

ZHANAY KIANA FLYNN and ANTANESHA MONE FRITZ,

Defendants herein, while located on Robins Air Force Base, on land acquired for the use of the United States and under the exclusive and concurrent jurisdiction thereof, did individually and as

parties concerned in the commission of a crime, commit the offense of Simple Battery, in that Defendants did intentionally make physical contact with the person of Minor Victim 10, a child under the age of eighteen years, which physical contact was of an insulting and provoking nature, to wit: defendants lifted said child's cot from the ground while said child was still sleeping on top of it, causing said child to fall onto the ground, in violation of Sections 16-5-23(a)(1) and 16-2-20 of the Official Code of Georgia Annotated and Title 18, United States Code, Sections 7(3) and 13.

COUNT TWENTY-SIX

On or about January 25, 2021, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

ZHANAY KIANA FLYNN and ANTANESHA MONE FRITZ,

Defendants herein, while located on Robins Air Force Base, on land acquired for the use of the United States and under the exclusive and concurrent jurisdiction thereof, did individually and as parties concerned in the commission of a crime, commit the offense of Simple Battery, in that Defendants did intentionally make physical contact with the person of Minor Victim 13, a child under the age of eighteen years, which physical contact was of an insulting and provoking nature, to wit: defendants struck a toy out of said child's hands and forced said child into a small enclosure, in violation of Sections 16-5-23(a)(1) and 16-2-20 of the Official Code of Georgia Annotated and Title 18, United States Code, Sections 7(3) and 13.

COUNT TWENTY-SEVEN

On or about February 10, 2021, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

ZHANAY KIANA FLYNN and ANTANESHA MONE FRITZ,

Defendants herein, while located on Robins Air Force Base, on land acquired for the use of the United States and under the exclusive and concurrent jurisdiction thereof, did individually and as parties concerned in the commission of a crime, commit the offense of Simple Battery, in that Defendants did intentionally make physical contact with the persons of Minor Victim 11 and Minor Victim 12, each one a child under the age of eighteen years, which physical contact was of an insulting and provoking nature, to wit: defendants sprayed each child in the head and face with a cleaning solution, in violation of Sections 16-5-23(a)(1) and 16-2-20 of the Official Code of Georgia Annotated and Title 18, United States Code, Sections 7(3) and 13.

COUNTS TWENTY-EIGHT THROUGH THIRTY
(FAILURE TO REPORT SUSPECTED CHILD ABUSE)

COUNT TWENTY-EIGHT

Beginning on or about January 4, 2021 and continuing until on or about February 10, 2021, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

ZHANAY KIANA FLYNN,

Defendant herein, while engaged in her professional activity as a child care worker and on federal land and in a federally operated facility, did not as soon as possible make a report to a designated agency when she learned of facts that gave her reason to suspect a child, to wit: Minor Victims 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, and 14, had suffered an incident of child abuse, in violation of Title 18, United States Code, Section 2258 and Title 34, United States Code Section, 20341.

COUNT TWENTY-NINE

Beginning on or about January 4 and continuing until on or about February 10, 2021, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

ANTANESHA MONE FRITZ,

Defendant herein, while engaged in her professional activity as a child care worker and on federal land and in a federally operated facility, did not as soon as possible make a report to a designated agency when she learned of facts that gave her reason to suspect a child, to wit: Minor Victims 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, and 14, had suffered an incident of child abuse, in violation of Title 18, United States Code, Section 2258 and Title 34, United States Code Section, 20341.

COUNT THIRTY

Beginning on or about January 4 and continuing until on or about February 10, 2021, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

LATONA MAE LAMBERT,

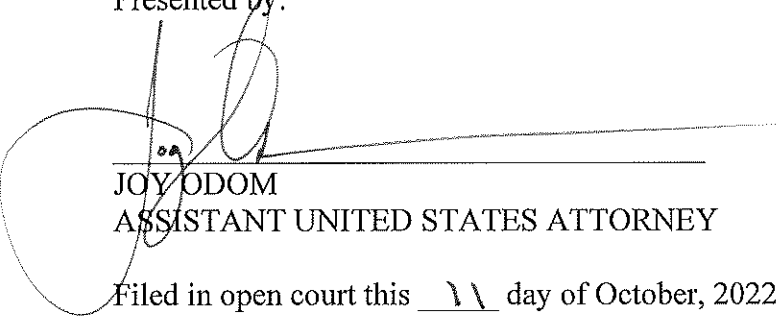
Defendant herein, while engaged in her professional activity as a child care worker and child care administrator and on federal land and in a federally operated facility, did not as soon as possible make a report to a designated agency when she learned of facts that gave her reason to suspect a child, to wit: Minor Victims 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, and 14, had suffered an incident of child abuse, in violation of Title 18, United States Code, Section 2258 and Title 34, United States Code Section, 20341.

A TRUE BILL.

s/Foreperson of the Grand Jury
FOREPERSON OF THE GRAND JURY

PETER D. LEARY
UNITED STATES ATTORNEY

Presented by:



JOY ODOM
ASSISTANT UNITED STATES ATTORNEY

Filed in open court this 11 day of October, 2022.


Deputy Clerk