

**TRUE BILL**

**IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, TENNESSEE  
19TH JUDICIAL DISTRICT**

STATE OF TENNESSEE )  
 )  
COUNTY OF MONTGOMERY )

**March Term, 2009**

**THE GRAND JURORS FOR THE STATE OF TENNESSEE**, duly elected, impaneled, sworn and charged to inquire in and for the body of the County of Montgomery, in the State aforesaid, upon their oath present:

**COUNT 1:**

That between January, 2008 and March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry and Elizabeth A. Perry** unlawfully, feloniously, intentionally and knowingly, did sexually penetrate G.P., who was more than 3 years of age and less than 13 years of age, by causing an object to be inserted into her vagina, in violation of TCA 39-13-522 and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 2**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between January, 2008 and March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry and Elizabeth A. Perry** unlawfully, feloniously, intentionally and knowingly, did sexually penetrate G.P., who was more than 3 years of age and less than 13 years of age, by causing an object to be inserted into her anus, in violation of TCA 39-13-522 and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 3**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between January, 2008 and March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry and Elizabeth A. Perry** unlawfully, feloniously, intentionally and knowingly, did sexually penetrate G.P., who was more than 3 years of age and less than 13 years of age, by causing an object to be inserted into her vagina, in violation of TCA 39-13-522 and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

FILED  
3/19 2009 3:00 A.M.  
SHERYL L. CASTLE  
CLERK OF COURT CLERK  
BY: J. Whitehead D.C.

**Count 4**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between January, 2008 and March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry and Elizabeth A. Perry** unlawfully, feloniously, intentionally and knowingly, did sexually penetrate G.P., who was more than 3 years of age and less than 13 years of age, by causing an object to be inserted into her anus, in violation of TCA 39-13-522 and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 5**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between January, 2008 and March 18, 2008, **Winnie L. Perry and Elizabeth A. Perry** unlawfully, feloniously, intentionally and knowingly, did sexually penetrate G.P., who was more than 3 years of age and less than 13 years of age, by causing an object to be inserted into her vagina, in violation of TCA 39-13-522 and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 6**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between January, 2008 and March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry and Elizabeth A. Perry** unlawfully, feloniously, intentionally and knowingly, did sexually penetrate G.P., who was more than 3 years of age and less than 13 years of age, by causing an object to be inserted into her anus, in violation of TCA 39-13-522 and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 7**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between January, 2008 and March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry and Elizabeth A. Perry** unlawfully, feloniously, intentionally and knowingly, did sexually penetrate V.P. by causing an object to be inserted into her vagina, each of said defendant's was aided or abetted by another person, to-wit; the other defendant, in violation of TCA 39-13-502(a)(3) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 8**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between January, 2008 and March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry** unlawfully, feloniously, intentionally and knowingly, did sexually penetrate V.P. by causing an object to be inserted into her vagina, each of said defendant's was aided or abetted by another person, to-wit; the other defendant, in violation of TCA 39-13-502(a)(3) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 9**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Earnest L. Perry, Winnie L. Perry and Elizabeth A. Perry**, unlawfully, feloniously, intentionally and knowingly did confine G.P. so as to substantially interfere with her liberty by tying her down to a cot with ropes, handcuffs and chains and in the course of said confinement said victim was under the age of thirteen in violation of TCA 39-13-305(a)(2) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 10**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Earnest L. Perry, Winnie L. Perry and Elizabeth A. Perry**, unlawfully, feloniously, intentionally and knowingly did confine G.P. so as to substantially interfere with her liberty by tying her down to a cot with ropes, handcuffs and chains and in the course of said confinement said victim was under the age of thirteen in violation of TCA 39-13-305(a)(2) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 11**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Earnest L. Perry, Winnie L. Perry and Elizabeth A. Perry**, unlawfully, feloniously, intentionally and knowingly did confine G.P. so as to substantially interfere with her liberty by tying her down to a cot with ropes, handcuffs and chains and in the course of said confinement said victim was under the age of thirteen, in violation of TCA 39-13-305(a)(2) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 12**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Earnest L. Perry, Windie L. Perry and Elizabeth A. Perry**, unlawfully, feloniously, intentionally and knowingly did confine V.P. so as to substantially interfere with her liberty by tying her down to a cot with ropes, handcuffs and chains and in the course of said confinement said victim suffered serious bodily injury, to wit, protracted disfigurement, in violation of TCA 39-13-305(a)(4) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 13**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Earnest L. Perry, Windie L. Perry and Elizabeth A. Perry**, unlawfully, feloniously, intentionally and knowingly did confine V.P. so as to substantially interfere with her liberty by tying her down to a cot with ropes, handcuffs and chains and in the course of said confinement said victim suffered serious bodily injury, to wit, protracted disfigurement, in violation of TCA 39-13-305(a)(4) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 14**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Earnest L. Perry, Windie L. Perry and Elizabeth A. Perry**, unlawfully, feloniously, intentionally and knowingly did confine V.P. so as to substantially interfere with her liberty by tying her down to a cot with ropes, handcuffs and chains and in the course of said confinement said victim suffered serious bodily injury, to wit, protracted disfigurement, in violation of TCA 39-13-305(a)(4) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 15**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between January 2007 and March 18, 2008 and in the State and County aforesaid, **Earnest L. Perry, Windie L. Perry and Elizabeth A. Perry**, unlawfully, feloniously, intentionally and knowingly did confine G.P. so as to substantially interfere with her liberty by placing her in dog kennel and in the course of said confinement said victim was under the age of thirteen (13), in violation of TCA 39-13-305(a)(2) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 16**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between January 2007 and March 18, 2008 and in the State and County aforesaid, **Earnest L. Perry, Windie L. Perry and Elizabeth A. Perry**, unlawfully, feloniously, intentionally and knowingly did confine G.P. so as to substantially interfere with her liberty by placing her in dog kennel and in the course of said confinement said victim was under the age of thirteen (13), in violation of TCA 39-13-305(a)(2) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL


**Count 17**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between January 2007 and March 18, 2008, and in the State and County aforesaid, **Earnest L. Perry, Windie L. Perry and Elizabeth A. Perry**, unlawfully, feloniously, intentionally and knowingly did confine G.P. so as to substantially interfere with her liberty by placing her in dog kennel and in the course of said confinement said victim was under the age of thirteen (13), in violation of TCA 39-13-305(a)(2) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 18**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between January 2007 and March 18, 2008, and in the State and County aforesaid, **Earnest L. Perry, Windie L. Perry and Elizabeth A. Perry**, unlawfully, feloniously, intentionally and knowingly did confine V.P. so as to substantially interfere with her liberty by placing her in dog kennel and in the course of said confinement said victim was under the age of thirteen (13), in violation of TCA 39-13-305(a)(2) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 19**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between January 2007 and March 18, 2008, and in the State and County aforesaid, **Earnest L. Perry, Windie L. Perry and Elizabeth A. Perry**, unlawfully, feloniously, intentionally and knowingly did confine V.P. so as to substantially interfere with her liberty by placing her in dog kennel and in the course of said confinement said victim was under the age of thirteen (13), in violation of TCA 39-13-305(a)(2) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 20**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between January 2007 and March 18, 2008, and in the State and County aforesaid, **Earnest L. Perry, Windie L. Perry and Elizabeth A. Perry**, unlawfully, feloniously, intentionally and knowingly did confine V.P. so as to substantially interfere with her liberty by placing her in dog kennel and in the course of said confinement said victim was under the age of thirteen (13), in violation of TCA 39-13-305(a)(2) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL


**Count 21**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Earnest L. Perry, Windie L. Perry and Elizabeth A. Perry**, unlawfully, feloniously, intentionally and knowingly did confine G.P. so as to substantially interfere with her liberty tying her to a chair and connecting her feet to her sister's by handcuffs and in the course of said confinement said victim was under the age of thirteen (13), in violation of TCA 39-13-305(a)(2) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 22**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Earnest L. Perry, Windie L. Perry and Elizabeth A. Perry**, unlawfully, feloniously, intentionally and knowingly did confine G.P. so as to substantially interfere with her liberty tying her to a chair and connecting her feet to her sister's by handcuffs and in the course of said confinement said victim was under the age of thirteen (13), in violation of TCA 39-13-305(a)(2) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 23**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Earnest L. Perry, Windie L. Perry and Elizabeth A. Perry**, unlawfully, feloniously, intentionally and knowingly did confine G.P. so as to substantially interfere with her liberty tying her to a chair and connecting her feet to her sister's by handcuffs and in the course of said confinement said victim was under the age of thirteen (13), in violation of TCA 39-13-305(a)(2) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 24**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Earnest L. Perry, Windie L. Perry and Elizabeth A. Perry**, unlawfully, feloniously, intentionally and knowingly did confine V.P. so as to substantially interfere with her liberty tying her to a chair and connecting her feet to her sister's by handcuffs and in the course of said confinement said victim was under the age of thirteen (13), in violation of TCA 39-13-305(a)(2) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 25**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Earnest L. Perry, Windie L. Perry and Elizabeth A. Perry**, unlawfully, feloniously, intentionally and knowingly did confine V.P. so as to substantially interfere with her liberty tying her to a chair and connecting her feet to her sister's by handcuffs and in the course of said confinement said victim was under the age of thirteen (13), in violation of TCA 39-13-305(a)(2) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 26**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Earnest L. Perry, Windie L. Perry and Elizabeth A. Perry**, unlawfully, feloniously, intentionally and knowingly did confine V.P. so as to substantially interfere with her liberty tying her to a chair and connecting her feet to her sister's by handcuffs and in the course of said confinement said victim was under the age of thirteen (13), in violation of TCA 39-13-305(a)(2) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 27**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Earnest L. Perry, Windie L. Perry and Elizabeth A. Perry**, unlawfully, feloniously, intentionally and knowingly did confine G.P. so as to substantially interfere with her liberty by barricading her in the closet and in the course of said confinement said victim was under the age of thirteen (13), in violation of TCA 39-13-305(a)(2) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 28**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Earnest L. Perry, Windie L. Perry and Elizabeth A. Perry**, unlawfully, feloniously, intentionally and knowingly did confine G.P. so as to substantially interfere with her liberty by barricading her in the closet and in the course of said confinement said victim was under the age of thirteen (13), in violation of TCA 39-13-305(a)(2) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 29**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Earnest L. Perry, Windie L. Perry and Elizabeth A. Perry** unlawfully or knowingly, other than by accidental means, did treat G.P., a child under 18 years of age, in such a manner as to inflict bodily injuries and a deadly weapon, dangerous instrumentality or controlled substance was used to accomplish the act or abuse, neglect or endangerment and said acts of abuse were especially heinous, atrocious, cruel and involved the infliction of torture to the victim by beating her with poles and belts resulting protracted disfigurement, in violation of TCA 39-15-402 and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL



**Count 30**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Earnest L. Perry, Windie L. Perry and Elizabeth A. Perry** unlawfully or knowingly, other than by accidental means, did treat V.P., a child under 18 years of age, in such a manner as to inflict bodily injuries and a deadly weapon, dangerous instrumentality or controlled substance was used to accomplish the act or abuse, neglect or endangerment and said acts of abuse were especially heinous, atrocious, cruel and involved the infliction of torture to the victim by beating her with poles and belts resulting in protracted disfigurement, in violation of TCA 39-15-402 and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 31**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Earnest L. Perry, Windie L. Perry and Elizabeth A. Perry** unlawfully or knowingly, other than by accidental means, did treat G.P, a child under 18 years of age, in such a manner as to inflict bodily injuries to wit protracted disfigurement, by striking repeatedly striking the victim with a red rubber hose, in violation of TCA 39-15-402(a)(2) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 32**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Earnest L. Perry, Windie L. Perry and Elizabeth A. Perry** unlawfully or knowingly, other than by accidental means, did treat G.P, a child under 18 years of age, in such a manner as to inflict bodily injuries to wit protracted disfigurement, by striking repeatedly striking the victim with a red rubber hose, in violation of TCA 39-15-402(a)(2) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 33**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Earnest L. Perry, Windie L. Perry and Elizabeth A. Perry**, unlawfully, knowingly, other than by accidental means, or intentionally, did neglect G.P., a child less than 18 years of age, so as to adversely affect said child's health and welfare resulting in bodily injury to said child, and said acts of neglect or endangerment were especially heinous, atrocious, cruel and involved the infliction of torture to the victim by denying her food for a period of approximately four (4) to five (5) days, in violation of TCA 39-15-402 and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 34**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Earnest L. Perry, Windie L. Perry and Elizabeth A. Perry**, unlawfully, knowingly, other than by accidental means, or intentionally, did neglect V.P., a child less than 18 years of age, so as to adversely affect said child's health and welfare resulting in bodily injury to said child, and said acts of neglect or endangerment were especially heinous, atrocious, cruel and involved the infliction of torture to the victim by denying her food for a period of approximately four (4) to five (5) days, in violation of TCA 39-15-402 and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 35**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that on or about May 2006 and March 18, 2008, and in the State and County aforesaid, **Earnest L. Perry, Windie L. Perry and Elizabeth A. Perry** unlawfully or knowingly, other than by accidental means, did treat G.P., a child under 18 years of age, in such a manner as to inflict bodily injuries by striking her with extension cords, in violation of TCA 39-15-401 and against the peace and dignity of the State of Tennessee

  
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ATTORNEY GENERAL


**Count 36**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that on or about May 2006 and March 18, 2008, and in the State and County aforesaid, **Earnest L. Perry, Windie L. Perry and Elizabeth A. Perry** unlawfully or knowingly, other than by accidental means, did treat V.P., a child under 18 years of age, in such a manner as to inflict bodily injuries by striking her with extension cords, in violation of TCA 39-15-401 and against the peace and dignity of the State of Tennessee

  
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ATTORNEY GENERAL

**Count 37**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that on or about March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry and Elizabeth A. Perry** unlawfully or knowingly, other than by accidental means, did treat G.P., a child under 18 years of age, in such a manner as to inflict bodily injuries and said acts of abuse were especially heinous, atrocious, cruel and involved the infliction of torture to the victim by attaching jumper cables to her lips, in violation of TCA 39-15-402(a)(4) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 38**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that on or about March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry and Elizabeth A. Perry** unlawfully or knowingly, other than by accidental means, did treat G.P., a child under 18 years of age, in such a manner as to inflict bodily injuries and said acts of abuse were especially heinous, atrocious, cruel and involved the infliction of torture to the victim by attaching jumper cables to her hands/fingers, in violation of TCA 39-15-402(a)(4) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 39**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry and Elizabeth A. Perry** unlawfully or knowingly, other than by accidental means, did treat G.P., a child under 18 years of age, in such a manner as to inflict bodily injuries and said acts of abuse were especially heinous, atrocious, cruel and involved the infliction of torture to the victim by attaching jumper cables to her feet/toes, in violation of TCA 39-15-402(a)(4) and against the peace and dignity of the State of Tennessee

  
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ATTORNEY GENERAL

**Count 40**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry and Elizabeth A. Perry** unlawfully or knowingly, other than by accidental means, did treat G.P., a child under 18 years of age, in such a manner as to inflict bodily injuries and said acts of abuse were especially heinous, atrocious, cruel and involved the infliction of torture to the victim by attaching jumper cables to her vagina, in violation of TCA 39-15-402(a)(4) and against the peace and dignity of the State of Tennessee

  
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ATTORNEY GENERAL

**Count 41**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry and Elizabeth A. Perry** unlawfully or knowingly, other than by accidental means, did treat V.P., a child under 18 years of age, in such a manner as to inflict bodily injuries and said acts of abuse were especially heinous, atrocious, cruel and involved the infliction of torture to the victim by attaching jumper cables to her lips, in violation of TCA 39-15-402(a)(4) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 42**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry and Elizabeth A. Perry** unlawfully or knowingly, other than by accidental means, did treat V.P., a child under 18 years of age, in such a manner as to inflict bodily injuries and said acts of abuse were especially heinous, atrocious, cruel and involved the infliction of torture to the victim by attaching jumper cables to her hands/fingers, in violation of TCA 39-15-402(a)(4) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 43**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry and Elizabeth A. Perry** unlawfully or knowingly, other than by accidental means, did treat V.P., a child under 18 years of age, in such a manner as to inflict bodily injuries and said acts of abuse were especially heinous, atrocious, cruel and involved the infliction of torture to the victim by attaching jumper cables to her feet/toes, in violation of TCA 39-15-402(a)(4) and against the peace and dignity of the State of Tennessee

  
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ATTORNEY GENERAL

**Count 44**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry and Elizabeth A. Perry** unlawfully or knowingly, other than by accidental means, did treat V.P., a child under 18 years of age, in such a manner as to inflict bodily injuries and said acts of abuse were especially heinous, atrocious, cruel and involved the infliction of torture to the victim by attaching jumper cables to her vagina, in violation of TCA 39-15-402(a)(4) and against the peace and dignity of the State of Tennessee

  
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ATTORNEY GENERAL

**Count 45**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry and Elizabeth A. Perry** unlawfully or knowingly, other than by accidental means, did treat V.P., a child under 18 years of age, in such a manner as to inflict bodily injuries and said acts of abuse were especially heinous, atrocious, cruel and involved the infliction of torture to the victim by attaching jumper cables to her tongue, in violation of TCA 39-15-402(a)(4) and against the peace and dignity of the State of Tennessee

  
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ATTORNEY GENERAL

**Count 46**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry and Elizabeth A. Perry** unlawfully or knowingly, other than by accidental means, did treat G.P., a child under 18 years of age, in such a manner as to inflict bodily injuries and said acts of abuse were especially heinous, atrocious, cruel and involved the infliction of torture to the victim by striking her all over her body, including her knees with a hammer, in violation of TCA 39-15-402(a)(4) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 47**

And the grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry and Elizabeth A. Perry** unlawfully or knowingly, other than by accidental means, did treat V.P., a child under 18 years of age, in such a manner as to inflict serious bodily injuries and a deadly weapon or dangerous instrumentality was used to accomplish the act or abuse, neglect or endangerment and said acts of abuse were especially heinous, atrocious, cruel and involved the infliction of torture to the victim by beating her thumb with a hammer resulting in protracted disfigurement, in violation of TCA 39-15-402 and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 48**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between January 2007, and January 2008 in the State and County aforesaid, **Winnie L. Perry and Elizabeth A. Perry** unlawfully or knowingly, other than by accidental means, did treat G.P., a child under 18 years of age, in such a manner as to inflict bodily injuries and said acts of abuse were especially heinous, atrocious, cruel and involved the infliction of torture to the victim by covering her entire face with duct tape and striking her with a bat, in violation of TCA 39-15-402(a)(4) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 49**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry and Elizabeth A. Perry** unlawfully or knowingly, other than by accidental means, did treat V.P., a child under 18 years of age, in such a manner as to inflict serious bodily injuries and said acts of abuse were especially heinous, atrocious, cruel and involved the infliction of torture to the victim by bending her fingers and thumb resulting in protracted disfigurement, in violation of TCA 39-15-402 and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 50**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between July 2006 and July 2007, and in the State and County aforesaid, **Winnie L. Perry and Elizabeth A. Perry** unlawfully or knowingly, other than by accidental means, did treat V.P., a child under 18 years of age, in such a manner as to inflict serious bodily injuries and said acts of abuse were especially heinous, atrocious, cruel and involved the infliction of torture to the victim by breaking her thumb resulting in protracted disfigurement, in violation of TCA 39-15-402 and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 51**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry and Elizabeth A. Perry** unlawfully or knowingly, other than by accidental means, did treat G.P., a child under 18 years of age, in such a manner as to inflict serious bodily injuries and said acts of abuse were especially heinous, atrocious, cruel and involved the infliction of torture to the victim by burning her face and neck with a curling iron resulting in scarring, in violation of TCA 39-15-402(a)(4) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 52**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry and Elizabeth A. Perry** unlawfully or knowingly, other than by accidental means, did treat V.P., a child under 18 years of age, in such a manner as to inflict serious bodily injuries and said acts of abuse were especially heinous, atrocious, cruel and involved the infliction of torture to the victim by burning her face and neck with a curling iron resulting in protracted, in violation of TCA 39-15-402(a)(4) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 53**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between January 2008 and March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry and Elizabeth A. Perry** unlawfully or knowingly, other than by accidental means, did treat G.P., a child under 18 years of age, in such a manner as to inflict serious bodily injuries, to wit protracted disfigurement to the victim, by striking her with a red rubber hose during "boot camp, in violation of TCA 39-15-402(a)(2) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 54**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between January 2008 and March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry and Elizabeth A. Perry** unlawfully or knowingly, other than by accidental means, did treat V.P., a child under 18 years of age, in such a manner as to inflict serious bodily injuries to wit protracted disfigurement to the victim, by striking her with a red rubber hose during "boot camp, in violation of TCA 39-15-402(a)(2) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL


**Count 55**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that on or about May 2006 and March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry and Elizabeth A. Perry** unlawfully or knowingly, other than by accidental means, did treat V.P., a child under 18 years of age, in such a manner as to inflict bodily injuries to wit choking the victim with their hands, in violation of TCA 39-15-401 and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL


**Count 56**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Earnest L. Perry, Winnie L. Perry** did act with the culpability required for the offense of Child Abuse in violation of TCA 39-15-401, by causing or aiding any innocent or irresponsible person to engage in conduct prohibited by the definition of the offense, to wit, did unlawfully or knowingly, other than by accidental means treat V.P., a child under 18 years of age, in such a manner as to inflict injuries by ordering other children in their home to throw the victim up in the air and permitting her to fall to the floor ("slam dunking"), in violation of TCA 39-15-401(a) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 57**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Earnest L. Perry, Winnie L. Perry**, did act with the culpability required for the offense of Child Abuse in violation of TCA 39-15-401, by causing or aiding any innocent or irresponsible person to engage in conduct prohibited by the definition of the offense, to wit, did unlawfully or knowingly, other than by accidental means treat G.P., a child under 18 years of age, in such a manner as to inflict injuries by ordering other children in their home to throw the victim up in the air and permitting her to fall to the floor ("slam dunking"), in violation of TCA 39-15-401(a) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL




**Count 58**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between January 2007 and January 2008, and in the State and County aforesaid, **Winnie L. Perry** unlawfully, knowingly, other than by accidental means, or intentionally, did neglect G.P, a child less than 18 years of age in such a manner as to inflict bodily injuries and said acts of abuse were especially heinous, atrocious, cruel and involved the infliction of torture to the victim to wit using a pair of pliers to grasp the frenulum linguae (under the tongue), in violation of TCA 39-15-402(a)(4) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 59**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry** unlawfully or knowingly, other than by accidental means, did treat V.P., a child under 18 years of age, in such a manner as to inflict bodily injuries and said acts of abuse were especially heinous, atrocious, cruel and involved the infliction of torture to the victim by placing clothes pins on her breasts/nipples, in violation of TCA 39-15-402(a)(4) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 60**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry** unlawfully or knowingly, other than by accidental means, did treat G.P., a child under 18 years of age, in such a manner as to inflict bodily injuries and a deadly weapon or dangerous instrumentality was used to accomplish the act or abuse, neglect or endangerment and said acts of abuse were especially heinous, atrocious, cruel and involved the infliction of torture to the victim by beating the victim's vagina with a hammer causing swelling and bleeding, in violation of TCA 39-15-402(a)(4) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL


**Count 61**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between January 2008 and March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry** unlawfully or knowingly, other than by accidental means, did treat G.P., a child under 18 years of age, in such a manner as to inflict bodily injuries and said acts of abuse were especially heinous, atrocious, cruel and involved the infliction of torture to the victim by forcing a broomstick down her throat, in violation of TCA 39-15-402(a)(4) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 62**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry** unlawfully or knowingly, other than by accidental means, did treat V.P., a child under 18 years of age, in such a manner as to inflict bodily injuries and said acts of abuse were especially heinous, atrocious, cruel and involved the infliction of torture to the victim by forcing a red rubber hose down her throat resulting in the victim vomiting blood, in violation of TCA 39-15-402(a)(4) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 63**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry** unlawfully or knowingly, other than by accidental means, did treat G.P., a child under 18 years of age, in such a manner as to inflict bodily injuries and a deadly weapon or dangerous instrumentality was used to accomplish the act or abuse, neglect or endangerment and said acts of abuse were especially heinous, atrocious, cruel and involved the infliction of torture to the victim by attempting to "cut off" her arm with an axe, striking her left arm, in violation of TCA 39-15-402(a)(3) and (4) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 64**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry** unlawfully or knowingly, other than by accidental means, did treat V.P., a child under 18 years of age, in such a manner as to inflict bodily injuries and said acts of abuse were especially heinous, atrocious, cruel and involved the infliction of torture to the victim by placing her in a dog kennel in a bathtub, heating water on the stove and pouring it in the tub, resulting in burns to the victim's hands and buttocks, in violation of TCA 39-15-402 and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 65**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between January 2007 and March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry** unlawfully or knowingly, other than by accidental means, did treat G.P., a child under 18 years of age, in such a manner as to inflict serious bodily injuries to wit protracted disfigurement to the victim striking her in the head with a brick, in violation of TCA 39-15-402(a)(2) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL


**Count 66**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between January 2004 and January 2005, and in the State and County aforesaid, **Winnie L. Perry** unlawfully or knowingly, other than by accidental means, did treat G.P., a child under 18 years of age in such a manner as to inflict bodily injuries, to wit protracted disfigurement to the victim by striking the victim in the head with a baseball bat resulting in a violation of TCA 39-15-402(a)(2) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 67**

And the grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry** unlawfully or knowingly, other than by accidental means, did treat G.P., a child under 18 years of age, in such a manner as to inflict bodily injuries and a deadly weapon or dangerous instrumentality was used to accomplish the act or abuse, neglect or endangerment and said acts of abuse were especially heinous, atrocious, cruel and involved the infliction of torture to the victim by cutting her lip with a butcher knife, in violation of TCA 39-15-402 and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 68**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry** unlawfully or knowingly, other than by accidental means, did treat V.P., a child under 18 years of age, in such a manner as to inflict bodily injuries and a deadly weapon or dangerous instrumentality was used to accomplish the act or abuse, neglect or endangerment and said acts of abuse were especially heinous, atrocious, cruel and involved the infliction of torture to the victim by cutting her lip with a butcher knife, in violation of TCA 39-15-402 and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL


**Count 69**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry** unlawfully or knowingly, other than by accidental means, did treat G.P, a child under 18 years of age, in such a manner as to inflict bodily injuries to wit protracted disfigurement, by striking repeatedly striking the victim with a red rubber hose, in violation of TCA 39-15-402(a)(2) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 70**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that on or about March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry** unlawfully or knowingly, other than by accidental means, did treat V.P., a child under 18 years of age, in such a manner as to inflict bodily injuries and a deadly weapon or dangerous instrumentality was used to accomplish the act or abuse, neglect or endangerment and said acts of abuse were especially heinous, atrocious, cruel and involved the infliction of torture to the victim by striking her in the head with a rolling pin, in violation of TCA 39-15-402 and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 71**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry**, unlawfully or knowingly, other than by accidental means, did treat G.P, a child under 18 years of age, in such a manner as to inflict bodily injuries and said acts of abuse were especially heinous, atrocious, cruel and involved the infliction of torture to the victim by using a staple gun on her thighs leaving scarring, in violation of TCA 39-15-402(a)(4) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 72**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that on or about March 18, 2008, and in the State and County aforesaid, **Winnie L. Perry** unlawfully or knowingly, other than by accidental means, did treat V.P., a child under 18 years of age, in such a manner as to inflict bodily injuries by striking her in the mouth with a spatula, in violation of TCA 39-15-401 and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 73**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Elizabeth A. Perry** unlawfully or knowingly, other than by accidental means, did treat G.P., a child under 18 years of age, in such a manner as to inflict bodily injuries and said acts of abuse were especially heinous, atrocious, cruel and involved the infliction of torture to the victim by throwing her up in the air and permitting her to fall to the floor ("slam dunking"), in violation of TCA 39-15-401(a) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL

**Count 74**

And the Grand Jurors aforesaid, upon their oath aforesaid, do further present and say that between May 2006 and March 18, 2008, and in the State and County aforesaid, **Elizabeth A. Perry** unlawfully or knowingly, other than by accidental means, did treat V.P., a child under 18 years of age, in such a manner as to inflict bodily injuries and said acts of abuse were especially heinous, atrocious, cruel and involved the infliction of torture to the victim, by throwing her up in the air and permitting her to fall to the floor ("slam dunking"), in violation of TCA 39-15-401(a) and against the peace and dignity of the State of Tennessee.

  
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ATTORNEY GENERAL