

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF FLORIDA
PANAMA CITY DIVISION

UNITED STATES OF AMERICA

v.

MARGO DEAL ANDERSON
JOSEPH ADAM ALBRITTON
ANTONIUS GENZARRA BARNES
and
JAMES DAVID FINCH

SEALED
SUPERSEDING
INDICTMENT
Case No.: 5:20cr28-MW

THE GRAND JURY CHARGES:

COUNT ONE

A. INTRODUCTION

At all times material to this Indictment:

1. The City of Lynn Haven was a municipality incorporated under the laws of the State of Florida. The City of Lynn Haven's Charter provided for a City Commission, consisting of a "Mayor-Commissioner," described throughout as the "Mayor," and four Commissioners. The Charter required, among other things, that the Mayor preside at all meetings of the Commission, that the Mayor was the official head of the City in certain circumstances, and the Mayor may take

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Jessica J. Lyublanovits
By: *Angela Mauer*
Deputy Clerk

command of the police and fire departments and govern the city by proclamation during the times of grave public danger or emergency and shall be the judge of what constitutes such danger or emergency. The administrative head of the city government was a City Manager, appointed by the Commission, and subject to its direction and supervision.

2. **MARGO DEAL ANDERSON** was elected as Mayor of Lynn Haven on April 21, 2015. **ANDERSON** was re-elected as Mayor of Lynn Haven on April 16, 2019. As Mayor of Lynn Haven, **ANDERSON** acted as the de facto head of the municipal government and sometimes directed the activities of the City Manager, who was responsible for the day-to-day operations and administrative functions of Lynn Haven. **ANDERSON**, as Mayor, presided over and participated in Lynn Haven Commission meetings, contributed to the agenda for all Commission meetings, and possessed one vote on the City Commission equal to each Commissioner. As the Mayor of Lynn Haven, **MARGO DEAL ANDERSON** was an agent of the City of Lynn Haven, and had a fiduciary duty to act in the best interests of Lynn Haven and its citizens.

3. **JOSEPH ADAM ALBRITTON** entered into a contract with Lynn Haven to be the City Attorney for Lynn Haven on or about October 22, 2018, effective October 15, 2018, for one year. The contract retained **ALBRITTON** to provide professional legal services and perform other related duties to the

