

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION**

UNITED STATES OF AMERICA

v.

**JERMAINE TERRELL HADLEY
a/k/a "Tank"
LEONARD SAFFORD
and
DECARLISE CHAPMAN**

**SEALED
SUPERSEDING
INDICTMENT
4:19cr61-MW-CAS**

THE GRAND JURY CHARGES:

COUNT ONE

INTRODUCTION

At all times relevant to this Indictment:

1. An "animal fighting venture" was "any event, in or affecting interstate or foreign commerce, that involves a fight conducted or to be conducted between at least 2 animals for purposes of sport, wagering, or entertainment." Title 7, United States Code, Section 2156(g)(1).

THE CONSPIRACY

2. Beginning on or about November 1, 2014, and continuing until on or about May 15, 2019, in the Northern District of Florida, and elsewhere, the defendants,

**JERMAINE TERRELL HADLEY,
a/k/a “Tank,”
LEONARD SAFFORD,
and
DECARLISE CHAPMAN,**

(hereinafter, collectively, the “Defendants”), and others, did knowingly and intentionally conspire and agree with each other, to commit the following offenses:

- a. to sponsor and exhibit dogs in animal fighting ventures, contrary to Title 7, United States Code, Section 2156(a)(1); and
- b. to possess, train, transport, deliver, and receive dogs for purposes of having the dogs participate in animal fighting ventures, contrary to Title 7, United States Code, Section 2156(b).

OBJECTS OF THE CONSPIRACY

3. The objects of the conspiracy were for the Defendants, and others:
 - a. to sponsor and exhibit dogs in animal fighting ventures; and,
 - b. to possess, breed, train, transport, deliver, and receive dogs for the purpose of having the dogs participate in animal fighting ventures.

MANNER AND MEANS OF THE CONSPIRACY

4. It was part of the conspiracy that the Defendants and others developed and maintained properties for purposes of housing and training pit bull-type dogs for use in dogfights, for using and storing dog-fighting equipment, and to conduct dogfights.

5. It was further a part of the conspiracy that the Defendants and others housed pit bull-type dogs in and around their residences, or on properties utilized by them for purposes of housing and training pit bull-type dogs for use in dogfights, for using and storing dog-fighting equipment, and to conduct dogfights.

6. It was further a part of the conspiracy that the Defendants and others trained and conditioned pit bull-type dogs to fight in dogfights.

7. It was further a part of the conspiracy that the Defendants and others acquired and maintained medical equipment, such as veterinary injectable medications and medications for purposes of attempting to treat dogs injured during dogfights, without the assistance or scrutiny of a veterinarian.

8. It was further a part of the conspiracy that the Defendants and others communicated with one another by telephone, text message, social media platforms, and other electronic means, about: the transport, delivery, transfer, exchange, purchase, sale, breeding, training, and receipt of particular fighting dogs; their possession of, and ownership interests in, particular fighting dogs; arrangements to fight dogs and to attend dog fights, including “roll” fights; the lineage or “bloodline” of certain fighting dogs; the aptitude, abilities, and fighting histories of particular fighting dogs; evasion of law enforcement; and drugs and equipment used to try to treat wounded fighting dogs.

9. It was further a part of the conspiracy that the Defendants and others transported and delivered pit bull-type dogs for use in dog fights and used vehicles to store, transport, and deliver fighting dogs and dog fighting equipment.

10. It was further a part of the conspiracy that the Defendants and others arranged to fight pit bull-type dogs in dogfights.

11. It was further a part of the conspiracy that the Defendants and others fought pit bull-type dogs in dogfights, including “roll” fights.

12. It was further part of the conspiracy that the Defendants and others did breed pit-bull type dogs for puppies, which the Defendants made available for resale to other individuals for purposes of the puppies being trained to later participate in dogfights.

13. It was further a part of the conspiracy that the Defendants and others posted, obtained, and forwarded information about fighting dog bloodlines and pedigrees, including using social media platforms and from dog fighting websites.

OVERT ACTS

14. In furtherance of the conspiracy and to effect the unlawful objects thereof, the following overt acts, among others, were committed in the Northern District of Florida and elsewhere:

a. Between on or about January 6, 2019, and on or about January 30, 2019, **JERMAINE TERRELL HADLEY, a/k/a “Tank,”** provided information

via text message communications to an individual identified here as Cooperating Source #1 (or CS#1), regarding **HADLEY**'s efforts to purchase, breed, and train dogs for the purposes of engaging in dog fighting; further, that **HADLEY** provided CS#1 information from the dog fighting website "www.apbt.com" regarding online pedigree information about his fighting dogs.

b. On or about January 28, 2019, CS#1 communicated with **HADLEY** via cellular telephone, during which communications CS#1 informed **HADLEY** that CS#1 had an acquaintance (an undercover law enforcement agent (or UC), interested in purchasing a young dog for the purpose of training the dog to participate in dog fights; **HADLEY** informed CS#1 he had a dog that he would sell.

c. On or about January 30, 2019, **HADLEY** communicated information to CS#1 regarding the meeting location in the Northern District of Florida for a dogfight, and invited CS#1 to attend.

d. On or about January 30, 2019, **HADLEY** and others conducted and attended a dogfight at a location on Mount Pleasant Road, Gadsden County, Florida, in the Northern District of Florida.

e. Between on or about February 1, 2019, and on or about February 6, 2019, **HADLEY** communicated with CS#1 via voice and text message

communication using a cellular telephone number, during which communications **HADLEY** agreed to sell a pit bull-type dog to CS#1 and UC.

f. On or about February 7, 2019, **HADLEY** sold a pit bull-type dog to CS#1 and UC with the intent that the dog would be used by UC to engage in dog fighting in a transaction that occurred at a residence located at Mount Pleasant Road, Gadsden County, Florida, in the Northern District of Florida.

g. On or about February 7, 2019, **HADLEY** engaged in telephone communication with coconspirator Dennis Lamar Howard, during which he informed Howard that he (**HADLEY**) would need the “dog fighting box,” to which Howard agreed and asked that **HADLEY** inform him when he would need it.

h. On or about February 7, 2019, coconspirator Howard was observed loading dogfighting equipment from a trailer located at the residence of coconspirator Devar San Jacus Donaldson as requested by **HADLEY**, after which the equipment was transported to a location on Holmes Road in Gadsden County, Florida, in the Northern District of Florida.

i. On or about February 9, 2019, **HADLEY** conducted voice and text communications with numerous individuals, including coconspirators Sariem Shanquell McMillian and Donaldson, Howard, individuals identified here as “D.S.,” “W.H.,” “C.L.,” “B.T.,” and others, regarding plans to conduct a dog fight later that evening. During the communications, **HADLEY** discussed the time,

location, weights of dogs that would be fought, plans for equipment needed for the fights, entry fees, and forfeit money associated with the match.

j. On or about February 9, 2019, **HADLEY** and others conducted and attended a dogfight at a location on Holmes Road in Gadsden County, Florida, in the Northern District of Florida.

k. On an unknown exact date prior to on or about March 1, 2019, in the course of training a pit bull-type dog in preparation for an upcoming fight, coconspirator Bob Streets did leave the dog in a pool unattended and in so doing allowed the dog to drown.

l. On or about March 1, 2019, **HADLEY** communicated information to CS#1 regarding the meeting location for a dogfight, which was scheduled to occur on or about March 2, 2019, and invited CS#1 to attend.

m. On or about March 2, 2019, **HADLEY** engaged in telephone communications with **DECARLISE CHAPMAN**, "D.S.," and unknown individuals "Bill LNU," and "FNU/LNU #1," during which communications **HADLEY** discussed the time, location, weights of dogs that would be fought, entry fees, and forfeit money associated with the planned-for fights.

n. On or about March 2, 2019, **HADLEY**, **CHAPMAN**, coconspirator Randell Lavell Colston, and others conducted and attended a dogfight at a location on Thigpen Road in Gadsden County, Florida, in the Northern District of Florida.

o. On or about April 2, 2019, **HADLEY** engaged in telephone communication with **LEONARD SAFFORD**, and coconspirators Zanntayfey Bennett and Donaldson, during which communications **HADLEY** discussed plans with the others for a dogfight that was planned to be conducted at the residence of coconspirator Colston later that evening.

p. On or about April 2, 2019, **HADLEY, SAFFORD**, coconspirators Bennett, Donaldson, and Colston, and others conducted and attended a dogfight on Thigpen Road, in Gadsden County, Florida, in the Northern District of Florida.

q. On or about May 1, 2019, coconspirator Streets used training equipment located at property belonging to coconspirator Colston to train a pit bull-type fighting dog in preparation for dog fighting.

r. On or about May 10, 2019, **HADLEY** possessed thirty-nine live and deceased pit bull-type dogs for the purposes of having the dogs participate in an animal fighting venture, and equipment used in dog fighting training and dog fighting, at multiple locations in Gadsden County, Florida in the Northern District of Florida.

s. On or about May 10, 2019, coconspirator Donaldson possessed seventeen pit bull-type dogs, several of which he shared ownership with **CHAPMAN**, for the purpose of having the dogs participate in an animal fighting

venture, and equipment used in dog fighting training and dog fighting, at a location in Gadsden County, Florida, in the Northern District of Florida.

t. On or about May 10, 2019, coconspirator Colston possessed fifteen pit bull-type dogs for the purpose of having the dogs participate in an animal fighting venture, and equipment used in dog fighting training and dog fighting, at a location in Gadsden County, Florida, in the Northern District of Florida.

u. On or about May 10, 2019, **SAFFORD** possessed ten pit bull-type dogs for the purpose of having the dogs participate in an animal fighting venture, and equipment used in dog fighting training and dog fighting, at a location in Gadsden County, Florida, in the Northern District of Florida.

v. Between on or about November 1, 2014, and continuing at least until on or about May 15, 2019, **CHAPMAN** did maintain a Facebook social media page, wherein **CHAPMAN** frequently posted photographs and pedigree or bloodline information associated with pit bull-type fighting dogs that he used in dog fights or intended to use in future fights.

w. On or about May 15, 2019, coconspirators Bennett and Streets, and others conducted and attended a dogfight at a location on Thigpen Road in Gadsden County, Florida, in the Northern District of Florida.

All in violation of Title 18, United States Code, Section 371, Title 7, United States Code, Sections 2156(a)(1) and 2156(b), and Title 18, United States Code, Section 49.

COUNT TWO

On or about February 7, 2019, in the Northern District of Florida and elsewhere, the defendant,

**JERMAINE TERRELL HADLEY,
a/k/a "Tank,"**

did knowingly transport and deliver a dog for the purpose of having the dog participate in an animal fighting venture, namely:

COUNT	DOG
2	UNNAMED DOG #1

In violation of Title 7, United States Code, Section 2156(b), and Title 18, United States Code, Sections 2 and 49.

COUNTS THREE THROUGH FORTY-ONE

On or about May 10, 2019, in the Northern District of Florida and elsewhere, the defendant,

**JERMAINE TERRELL HADLEY,
a/k/a "Tank,"**

did knowingly possess and train a dog for the purpose of having the dog participate in an animal fighting venture, namely:

COUNT	DOG
3	USM-285
4	USM-286
5	USM-287
6	USM-288
7	USM-289
8	USM-290
9	USM-291
10	USM-292
11	USM-293
12	USM-294
13	USM-295
14	USM-297
15	USM-298
16	USM-299
17	USM-300
18	USM-301
19	USM-302
20	USM-303
21	USM-304
22	USM-305
23	USM-306
24	USM-307
25	USM-308
26	USM-309
27	USM-310
28	USM-311
29	USM-312
30	USM-313
31	USM-314
32	USM-316
33	USM-317
34	USM-318
35	USM-319
36	USM-320
37	USM-321
38	USM-322

39	USM-323
40	USM-340
41	USM-367

In violation of Title 7, United States Code, Section 2156(b) and Title 18, United States Code, Section 49.

COUNTS FORTY-TWO THROUGH FIFTY-ONE

On or about May 10, 2019, in the Northern District of Florida and elsewhere, the defendant,

LEONARD SAFFORD,

did knowingly possess and train a dog for the purpose of having the dog participate in an animal fighting venture, namely:

COUNT	DOG
42	USM-274
43	USM-275
44	USM-276
45	USM-277
46	USM-278
47	USM-279
48	USM-280
49	USM-281
50	USM-282
51	USM-283

In violation of Title 7, United States Code, Section 2156(b) and Title 18,
United States Code, Section 49.

A TRUE BILL:



FOREPERSON

12/03/2019

DATE

Handwritten signature of Lawrence Keeffe in black ink.

LAWRENCE KEEFFE
United States Attorney

Handwritten signature of Eric K. Mountin in black ink.

ERIC K. MOUNTIN
Assistant United States Attorney