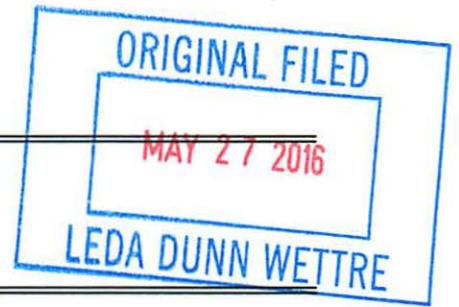


UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY



UNITED STATES OF AMERICA : Hon. Leda Dunn Wettre
v. : Mag. No. 16-8050
LYDELL HARRIS, : **CRIMINAL COMPLAINT**
a/k/a "Sin" :

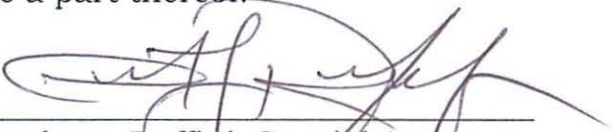
I, the undersigned complainant, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the United States Department of Agriculture, Office of Inspector General, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part thereof.


Anthony Ruffini, Special Agent
U.S. Department of Agriculture
Office of Inspector General

Sworn to before me and subscribed
in my presence, May 27, 2016 in
Newark, New Jersey

HONORABLE LEDA DUNN WETTRE
UNITED STATES MAGISTRATE JUDGE


Signature of Judicial Officer

ATTACHMENT A

From on or about April 13, 2016 through on or about May 9, 2016, in Cumberland County in the District of New Jersey, and elsewhere, defendant

LYDELL HARRIS,
a/k/a "Sin,"

knowingly possessed dogs for purposes of having the dogs participate in an animal fighting venture, namely, an event, in and affecting interstate and foreign commerce, that involved a fight conducted or to be conducted between at least two animals for purposes of sport, wagering, and entertainment, in violation of Title 7, United States Code, Section 2156 and Title 18 United States Code Section 49; and Title 18, United States Code, Section 2.

ATTACHMENT B

I, Anthony Ruffini, am a Special Agent with the United States Department of Agriculture, Office of Inspector General. I have knowledge of the facts set forth herein based on my personal participation in this investigation, my conversations with other members of law enforcement and my review of oral and written reports from other law enforcement officers, and my training and experience investigating dog fighting ventures. Where statements of others are set forth herein, including statements that were intercepted, these statements are related in substance and in part. Because Attachment B is being submitted for the limited purpose of establishing probable cause, I have not set forth each and every fact that I have learned during the course of the investigation.

I. BACKGROUND

At all times relevant to this complaint, unless otherwise indicated:

1. Defendant LYDELL HARRIS, a/k/a "Sin" ("HARRIS") was a resident of Vineland, New Jersey.

II. OVERVIEW OF DOG FIGHTING

2. Dog fighting typically involves pit bull-type dogs that are released by their owners or handlers in a controlled environment to attack each other and fight. The fight ends when one dog withdraws, when a handler "picks up" its dog and forfeits the match, or when one or both dogs die.

3. Prior to a dog fight, dog owners or handlers may enter into an agreement with their opponent, often referred to as a "match," "fight," or "show." The owners or handlers may agree upon: (1) the sex and set weight of the dogs at the time of the fight; (2) the geographic area in which the fight will occur (the exact location of which is often a secret until shortly before the fight); (3) a referee; (4) the payment of "forfeit" money that is lost if one participant pulls out of the match or if a participant's dog does not arrive at the agreed-upon weight; and (5) monetary wagers placed by the respective fighters.

4. Dogs used in animal fighting ventures are housed separately from other dogs, in pens, cages, or on chains, so that they will not hurt or kill other dogs when the handler is absent. Heavy chains are often used when restraining dogs to develop neck strength in dogs used for fighting purposes.

5. Dog fighters often take steps to house fighting dogs away from public view, such as placing them inside sheds, garages, or barns, or by erecting tall opaque fences around areas where fighting dogs are housed.

6. "Champion" or "Grand Champion" status refers to a dog who has won three or five fights, respectively.

7. Dog fighters may keep multiple dogs at a time in order to maintain a stock of dogs at different weights and both sexes for dogs to be matched for a fight according to weight and sex; to selectively breed, sell, and fight dogs displaying certain traits or to otherwise advance a particular dog fighting bloodline; and to have a sufficient number of dogs to fight dogs more than two to three times a year.

8. Finding an opponent who has a dog of the same weight and sex and who is looking to fight that dog at the same time of the year is known as "calling out a weight." Dog fighters often "call out a weight," by telephone, text, or e-mail, to known dog fighters in several states to increase their odds of finding a match.

9. Once a dog fighter locates an opponent and agrees upon terms, the match is "hooked" or set up. The dog then typically undergoes a conditioning process dog handlers refer to as a "keep." This "keep" may involve treadmills to run and exercise the dogs away from public view; weight pulls to increase the dog's strength and stamina; "spring poles" and "flirt poles" to build jaw strength and increase aggression; and the administration of drugs (such as steroids), vitamins, and other medicine. Animal pelts are also common for dog fighters to use to excite and bait dogs during dog fighting training sessions.

10. Dogs matched for future fights are expected to achieve their established target weight by the scheduled match, much like in human boxing matches.

11. Dog fighters often attempt to mend the injuries of their own dogs, rather than seek veterinary attention, which might raise suspicion regarding the cause of their dogs' injuries. Dog fighters also use veterinary supplements and pharmaceuticals to enhance fighting dogs' stamina and to keep injured dogs fighting longer.

III. HARRIS'S POSSESSION OF DOGS FOR DOG FIGHTS

12. From in or around October 2015 through in or around November 2015, law enforcement officers lawfully intercepted telephone conversations occurring over a cellular telephone used by an individual ("Associate 1") (hereinafter, the "Target Facility"). As set forth in Paragraphs 13 through 22 below, the lawfully intercepted conversations included calls between defendant HARRIS and Associate 1 in which, among other things, dog fights, breeding of dogs for dog fights, and treating dogs injured during dog fights were discussed. A sample of these calls is summarized below in sum and substance. Not all intercepted conversations to or from defendant HARRIS pertaining to dog fighting are summarized herein.

13. On or about October 9, 2015, defendant HARRIS placed an outgoing call to Associate 1 over the Target Facility. During this lawfully intercepted conversation, Associate 1 and defendant HARRIS discussed the scars on dogs in their possession and the degree to which the scars were visible.

14. On or about October 9, 2015, defendant HARRIS placed an outgoing call to Associate 1 over the Target Facility. During this lawfully intercepted conversation, defendant HARRIS told Associate 1 that he was working a dog called "Tee Tee" (phonetic) to "strengthen her mouth" to hold a bite.

15. On or about October 10, 2015, defendant HARRIS placed an outgoing call to Associate 1 over the Target Facility. During this lawfully intercepted conversation, defendant HARRIS told Associate 1 that "Tee Tee" was "coming together" and that he "got two weeks" to work on getting her to hold her bite "because I want her to be real sticky." I know from this investigation and from my investigation of dog fighting activities generally that this conversation refers to training the dog to hold a bite on an opponent dog rather than letting go right away.

16. On or about October 11, 2015, defendant HARRIS received an incoming call from Associate 1 over the Target Facility. During this lawfully intercepted conversation, defendant HARRIS and Associate 1 discussed the following:

- While discussing where to keep dogs, defendant HARRIS told Associate 1 that he had a twelve-foot shed. Defendant HARRIS and Associate 1 discussed the advantages of housing dogs inside a shed as opposed to in open view. Defendant HARRIS told Associate 1 that when the "SPCA came . . . they couldn't do nothing. They couldn't do nothing with the dogs that was inside of them. . . . They can't touch them. They can't even go in to look at them. They can't get a warrant to mess with them, nothing. They can't rescue the dogs."
- Defendant HARRIS and Associate 1 also discussed a recent dog fight and defendant HARRIS stated that his dog "Big Block" could have beaten the winning dog.
- Defendant HARRIS also told Associate 1 that he uses a spring pole to train dogs, and that "Tee Tee" snaps her jaws while being baited with a hide. Defendant HARRIS further described a prior fight with "Tee Tee" in Delaware, and stated that "Tee Tee" "fight[s] like a straight ahead dog" and knows how to "fight defense."

17. On or about October 15, 2015, defendant HARRIS placed an outgoing call to Associate 1 over the Target Facility. During this lawfully intercepted conversation, defendant HARRIS told Associate 1 that "Tee Tee" will be a 34 pound dog and was "falling in right on the money . . . it's like, showtime."

18. On or about October 21, 2015, defendant HARRIS placed an outgoing call to Associate 1 over the Target Facility. During this lawfully intercepted conversation, defendant HARRIS told Associate 1 that a particular referee had been selected for the upcoming "two-card" dog fight that defendant HARRIS's dog would be participating in.

19. On or about October 26, 2015, defendant HARRIS received an incoming call from Associate 1 over the Target Facility. During this lawfully intercepted conversation, defendant HARRIS told Associate 1, "zip 'em up, zip 'em up, another one dead. . . ." and that "Tee Tee never hit a wall. . . . mouth work, chest work, she even touched a kidney once or twice." Associate 1 asked defendant HARRIS, "where she [Tee Tee] finish at?" Defendant HARRIS replied, "the throat work was impeccable. . . . every time that dog went down, she was pushing carpet in her throat, bro. I'm talking about pushing from one side of the floor to the other side, all throat. . . . she hit a bleeder from the rip."

20. On or about November 5, 2015, defendant HARRIS received an incoming call from Associate 1 over the Target Facility. During this lawfully intercepted conversation, defendant HARRIS told Associate 1 that he had arranged for his dog "Big Block" to fight another dog who had won two previous dog fights, and that he had arranged for his dog "Chapo" to fight a "first time out dog," both on the same night. Defendant HARRIS stated that he had put up a \$2,000 forfeit for the fight with "Big Block." Defendant HARRIS told Associate 1 that he also had a fight "hooked" for his dog "Ghost." HARRIS also stated to Associate 1 that he intended to make "Big Block" a Grand Champion in 2016 and that he wanted to fight "Big Block" in January, May, and July 2016. I know from this investigation and from my investigation of dog fighting activities generally that "first time out dog" refers to a dog that is being fought for the first time.

21. On or about November 13, 2015, defendant HARRIS placed an outgoing call to Associate 1 over the Target Facility. During this lawfully intercepted conversation, defendant HARRIS stated: "I got a two-time winner when the other dog was on top of her, Tee Tee was still twisting underneath, still in her throat."

22. On or about November 14, 2015, defendant HARRIS received an incoming call from Associate 1 over the Target Facility. During this lawfully intercepted conversation, defendant HARRIS stated that his dog "Vicious" had just become a "two-time winner."

23. On or about April 13, 2016, law enforcement officers conducted aerial surveillance of defendant HARRIS's residence in Vineland, New Jersey. Law enforcement officers observed two sheds, one of which was consistent with the description of the twelve-foot shed that defendant HARRIS discussed with Associate 1 during the lawfully intercepted telephone conversation over the Target Facility on or about October 11, 2015, as referenced above in Paragraph 16. The surveillance also revealed that defendant HARRIS had four individual chain-link fence dog kennels on his property – two of which were occupied by pit bull-type dogs. Law enforcement officers also observed four plastic dog houses; a hunting blind obscuring a plastic dog house; several plastic dog crates; and a pit bull-type dog chained around its neck with a heavy metal chain staked to the ground.

24. On or about May 9, 2016, law enforcement officers conducted aerial surveillance of defendant HARRIS's residence in Vineland, New Jersey. Law enforcement officers again observed multiple pit bull-type dogs housed individually on the property, including one chained around its neck with a heavy metal chain that was staked to the ground. The dog on the heavy chain appeared to be shaved on its back and sides. I know from my training and experience investigating animal fighting ventures that some dog fighters shave dogs prior to a fight.