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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

AT 8:30 - 11/28/23 2:57 PM
CLERK, U.S. DISTRICT COURT - DNJ

UNITED STATES OF AMERICA	:	Hon. Karen M. Williams
	:	
v.	:	Crim. No. 23-787
	:	
TOMMY J. WATSON,	:	7 U.S.C. §§ 2156(a)(1) and (b)
a/k/a "Snakes," and	:	18 U.S.C. § 49
	:	18 U.S.C. § 371
JOHNNIE LEE NELSON, JR.,	:	18 U.S.C. § 922(g)(1)
a/k/a "Johnny"	:	18 U.S.C. § 2

SUPERSEDING INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark, charges as follows:

COUNT ONE
(Conspiracy)

At all times relevant to this Superseding Indictment, unless otherwise indicated:

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." 7 U.S.C. § 2156(f)(1).

Defendants

2. Defendant TOMMY J. WATSON, a/k/a “Snakes,” (“defendant WATSON”) was a resident of in or around Clayton, New Jersey.

3. Defendant JOHNNIE LEE NELSON, JR., a/k/a “Johnny,” (“defendant NELSON”) was a resident of in or around Bridgeton, New Jersey.

Conspiracy

4. From at least as early as on or about August 9, 2017, through at least on or about March 23, 2019, in the District of New Jersey, and elsewhere, the defendants,

**TOMMY J. WATSON,
a/k/a “Snakes,” and**

**JOHNNIE LEE NELSON, JR.,
a/k/a “Johnny,”**

(hereinafter, collectively, the “Defendants”) knowingly and intentionally conspired and agreed with each other, and others, 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 Title 18, United States Code, Section 49; and

b. to possess, train, and transport dogs for purposes of having the dogs participate in animal fighting ventures, contrary to Title 7, United States Code, Section 2156(b), and Title 18, United States Code, Section 49.

Goal of the Conspiracy

5. It was the goal of the conspiracy for the Defendants, together with each other and others, to sponsor and exhibit pit bull-type dogs in animal fighting ventures, and to possess, train, and transport pit bull-type dogs for purposes of having the dogs participate in animal fighting ventures.

Manner and Means of the Conspiracy

6. It was a part of the conspiracy that:

a. Defendant WATSON and others operated the dog fighting operation known as "From Da Bottom Kennels."

b. One or more of the Defendants and others developed and maintained properties for housing and training pit bull-type dogs for use in dog fights, and for using and storing dog fighting equipment.

c. One or more of the Defendants and others housed pit bull-type dogs in and around their residences, or properties utilized by them for such purpose.

d. One or more of the Defendants and others trained and conditioned pit bull-type dogs to fight in dog fights.

e. One or more of the Defendants and others acquired and maintained medical equipment, such as intravenous tubing and bags, skin staplers, suture removers, and veterinary injectable medications, for the purpose of attempting to treat dogs injured during dog fights, without the assistance or scrutiny of a veterinarian.

f. One or more of the Defendants and others communicated with one another by telephone, text message, an instant messaging application called Telegram Messenger, and other electronic means, about the following: dog fights; the transport, training, breeding, and killing of particular fighting dogs; the Defendants' possession of, and ownership interests in, particular fighting dogs; the lineage or bloodline of certain fighting dogs; evasion of law enforcement; and drugs and equipment used for purposes of dog fighting.

g. One or more of 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.

h. One or more of the Defendants and others arranged to fight pit bull-type dogs in dog fights and did, in fact, fight pit bull-type dogs in dog fights.

i. One or more of the Defendants and others posted, obtained, and forwarded information about fighting dog bloodlines and pedigrees, including from dog fighting websites.

j. One or more of the Defendants and others sought to enrich themselves by placing wagers on dog fights, taking steps to collect bets, collecting bets, and distributing proceeds.

k. One or more co-conspirators sought to impede law enforcement detection of dog fights they attended, so that, among other things, such fights could continue, and so the winning handlers could collect on and distribute wagers owed to them.

Overt Acts

7. In furtherance of the conspiracy and to effect the unlawful objects thereof, the Defendants, and others known and unknown, committed and caused to be committed, the following overt acts, among others, in the District of New Jersey, and elsewhere:

Overt Act 1. On or about August 9, 2017, and again on or about December 26, 2017, a person acting on behalf of “From Da Bottom Kennels” posted fighting dog pedigree or bloodline information on the dog fighting website “Peds Online,” including the fight history for several dogs owned by “From Da Bottom Kennels,” including the dog named “Bunz.”

Overt Act 2. From as early as on or about August 9, 2018, through on or about March 23, 2019, defendant WATSON possessed one or more fighting dogs and maintained a property at which he, defendant NELSON, and others housed those dogs.

Overt Act 3. From on or about November 30, 2018, to on or about March 21, 2019, defendant WATSON and others sent and received video messages through Telegram Messenger – including as part of the “DMV Board,” a Telegram Messenger-based dog fighting collective spanning several states – by which they transmitted videos of live-streamed dog fights, videos of training dogs for fights, solicitations to fight dogs, dog fight gambling information, and videos of the killing of underperforming fighting dogs, including by hanging.

Overt Act 4. On or about December 2, 2018, defendant WATSON, sponsored and exhibited Unnamed Dog #1 in a dog fight, against Unnamed

Dog #2, in an auto repair garage located on Center Road in Upper Deerfield Township, New Jersey (hereinafter, the "Center Road Location"), and live-streamed portions of the dog fight using Telegram Messenger.

Overt Act 5. On or about December 2, 2018, defendant WATSON sponsored and exhibited the dog "Bunz" in a dog fight against Unnamed Dog #3 in the auto repair garage at the Center Road Location, and live streamed portions of the dog fight using Telegram Messenger.

Overt Act 6. On or about January 23, 2019, defendant WATSON agreed, by text message, to fight his dog "Rambo" against a dog owned and exhibited by a person hereinafter referred to as "Co-Conspirator 1," at a dog fighting event on or about March 23, 2019.

Overt Act 7. On or about January 23, 2019, defendant WATSON and defendant NELSON, and a person hereinafter referred to as "Co-Conspirator 2," agreed by text message to undertake actions to prepare "Rambo" for the March 23, 2019, dog fight.

Overt Act 8. On or about February 23, February 24, February 26, February 27, and March 2, 2019, defendant WATSON possessed and trained the dog "Rambo" for the planned March 23, 2019, dog fight.

Overt Act 9. On or about March 13, 2019, defendant NELSON possessed and trained the dog "Rambo" for the planned March 23, 2019, dog fight.

Overt Act 10. On or about March 23, 2019, a co-conspirator transmitted the location of the dog fight that was to occur that evening to defendant WATSON by text message.

Overt Act 11. On or about March 23, 2019, defendant WATSON possessed the dog "Rambo," and transported him to the Center Road Location, for the purpose of sponsoring and exhibiting "Rambo" in a dog fight against a dog owned and exhibited by Co-Conspirator 1.

Overt Act 12. On or about March 23, 2019, defendant WATSON, and others, possessed medical and veterinary equipment for the purpose of do-it-yourself veterinary treatment of injured fighting dogs, including intravenous bags and lines, a skin stapler, and injectable blood clotting medication, most of which equipment was manufactured in interstate or international commerce, and transported these items to the Center Road Location.

Overt Act 13. On or about March 23, 2019, Unnamed Dog #4 and Unnamed Dog #5 were sponsored and exhibited in a dog fight at the Center Road Location prior to the fight scheduled between "Rambo" and a dog owned by Co-Conspirator 1.

Overt Act 14. On or about March 23, 2019, a co-conspirator placed a 911 call, falsely reporting a robbery at a business near the Center Road Location, for the purpose of attempting to divert law enforcement from the dog fight at the Center Road Location.

Overt Act 15. On or about March 23, 2019, individuals present at the Center Road Location moved Unnamed Dog #4 and Unnamed Dog #5 from the

fighting pit in the auto repair garage at the Center Road Location and placed the still-fighting dogs inside a stationary car within the garage, in an attempt to avoid law enforcement detection, as the persons fled from law enforcement officials who arrived to disrupt the dog fighting event.

All in violation of Title 18, United States Code, Section 371.

COUNTS TWO AND THREE

(Sponsoring and Exhibiting a Dog in an Animal Fighting Venture)

1. The allegations set forth in paragraphs 1 through 3, 6, and 7 of Count One of this Superseding Indictment are realleged as if fully set forth herein.

2. On or about December 2, 2018, in Cumberland County, in the District of New Jersey, and elsewhere, the defendant,

**TOMMY J. WATSON,
a/k/a "Snakes,"**

knowingly sponsored and exhibited dogs in animal fighting ventures, namely:

Count	Dog
Two	UNNAMED DOG #1
Three	"BUNZ"

In violation of Title 7, United States Code, Section 2156(a)(1), Title 18, United States Code, Section 49, and Title 18, United States Code, Section 2.

COUNT FOUR

(Possessing and Training a Dog for Use in an Animal Fighting Venture)

1. The allegations set forth in paragraphs 1 through 3, 6, and 7 of Count One of this Superseding Indictment are realleged as if fully set forth herein.

2. On or about February 23, 2019, through on or about March 2, 2019, in or around Gloucester, Bridgeton, and Salem Counties, in the District of New Jersey, and elsewhere, the defendant,

**TOMMY J. WATSON,
a/k/a "Snakes,"**

knowingly possessed and trained the dog "Rambo" for purposes of having the dog participate in an animal fighting venture.

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

COUNT FIVE

(Possessing and Training a Dog for Use in an Animal Fighting Venture)

1. The allegations set forth in paragraphs 1 through 3, 6, and 7 of Count One of this Superseding Indictment are realleged as if fully set forth herein.

2. On or about March 13, 2019, in or around Gloucester, Bridgeton, and Salem Counties, in the District of New Jersey, and elsewhere, the defendant,

**JOHNNIE LEE NELSON, JR.,
a/k/a "Johnny,"**

knowingly possessed and trained the dog "Rambo" for purposes of having the dog participate in an animal fighting venture.

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

COUNT SIX

(Possessing and Transporting a Dog for Use in an Animal Fighting Venture)

1. The allegations set forth in paragraphs 1 through 3, 6, and 7 of Count One of this Superseding Indictment are realleged as if fully set forth herein.

2. On or about March 23, 2019, in Cumberland County, in the District of New Jersey, and elsewhere, the defendant,

**TOMMY J. WATSON,
a/k/a "Snakes,"**

knowingly possessed and transported the dog "Rambo" for purposes of having the dog participate in an animal fighting venture.

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

COUNT SEVEN

(Possession of Ammunition by a Convicted Felon)

On or about March 23, 2019, in Cumberland County, in the District of New Jersey, and elsewhere, the defendant,

**TOMMY J. WATSON,
a/k/a "Snakes,"**

knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year in the Superior Court of New Jersey, Cumberland County, did knowingly possess ammunition, namely, five .38 caliber rounds of ammunition, and the ammunition was in and affecting commerce.

In violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION

As a result of committing the offense in violation of 18 U.S.C. § 922(g)(1), as charged in Count Seven of this Superseding Indictment, the defendant,

**TOMMY J. WATSON,
a/k/a "Snakes,"**

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any ammunition involved in or used in the commission of such offense, including, but not limited to, five rounds of .38 caliber ammunition, all of which were previously seized on or about March 25, 2019.

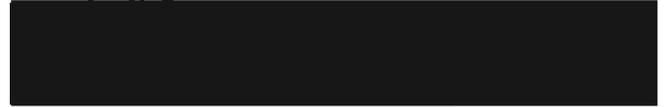
Substitute Assets Provision

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

A TRUE BILL



FOREPERSON

Philip R. Sellinger
PHILIP R. SELLINGER
UNITED STATES ATTORNEY

TODD KIM
ASSISTANT ATTORNEY GENERAL
U.S. DEPARTMENT OF JUSTICE
ENVIRONMENT AND NATURAL RESOURCES DIVISION

CASE NUMBER: _____

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

**TOMMY J. WATSON, a/k/a "SNAKES," and
JOHNNIE LEE NELSON, JR., a/k/a "JOHNNY"**

SUPERSEDING INDICTMENT FOR

**7 U.S.C. §§ 2156(a)(1) and (b)
18 U.S.C. § 49
18 U.S.C. § 371
18 U.S.C. § 922(g)(1)
18 U.S.C. § 2**

Foreperson

**PHILIP R. SELLINGER
UNITED STATES ATTORNEY
FOR THE DISTRICT OF NEW JERSEY**

**KATHLEEN P. O'LEARY
ASSISTANT U.S. ATTORNEY
NEWARK, NEW JERSEY
973-645-2841**
