

2/15/2017

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

AT 8:30
WILLIAM T. WALSH, CLERK

UNITED STATES OF AMERICA : Hon.
: Crim. No. 17- 50 (MLC)
v. :
: 7 U.S.C. § 2156
: 18 U.S.C. § 49
LYDELL HARRIS : 18 U.S.C. § 371

INDICTMENT

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

COUNT ONE
(Conspiracy to Sponsor and Exhibit a Dog in an Animal Fighting Venture)

Relevant Individuals

1. At all times relevant to Count One of this Indictment, unless otherwise indicated:
 - a. Defendant Lydell Harris ("defendant HARRIS") was a resident of Vineland, New Jersey.
 - b. Co-conspirator-1 ("CC-1"), who is a co-conspirator not charged herein, was a resident of Washington, DC.

The Conspiracy

2. From at least on or about May 25, 2015, through on or about June 1, 2016, in Cumberland and Gloucester Counties, and in the District of New Jersey, and elsewhere, the defendant,

LYDELL HARRIS,

CC-1, and others did knowingly and intentionally conspire and agree to knowingly sponsor and exhibit a dog in an animal fighting venture, namely, an event, in and affecting interstate and foreign commerce, that involves a fight conducted or to be conducted between at least two animals for purposes of sport, wagering and entertainment, contrary to Title 7, United States Code, Section 2156(a), and did an act to effect this object of the conspiracy.

Manner and Means of the Conspiracy

3. It was part of the conspiracy that defendant HARRIS and CC-1 maintained a supply of pitbull-type dogs used for dog fights at or around each of their respective residences.

4. It was a further part of the conspiracy that defendant HARRIS, and CC-1 trained their dogs at or around each of their respective residences to be used for dog fights.

5. It was a further part of the conspiracy that defendant HARRIS, CC-1, and others communicated by telephone about matching up dogs they owned against other dogs for fights and to discuss the results of dog fights.

6. It was a further part of the conspiracy that defendant HARRIS posted information on an internet website concerning dog fights, including a dog fight between a dog he owned, named "Tee Tee," and a dog owned by CC-1.

Overt Acts

7. In furtherance of the conspiracy and to effect its unlawful object, the following overt acts, among others, were committed in the District of New Jersey and elsewhere:

a. From at least on or about October 9, 2015, through on or about June 1, 2016, defendant HARRIS possessed Tee Tee at or around his residence.

b. On or about June 1, 2016, defendant HARRIS possessed eight pitbull-type dogs, including a dog named "Death's Angel," at or around his residence.

c. On or about June 1, 2016, CC-1 possessed pitbull-type dogs at or around his residence.

d. On or about October 25, 2015, defendant HARRIS and CC-1 participated in a dog fight in which defendant HARRIS used Tee Tee for the fight against a dog owned by CC-1.

e. On or about October 26, 2015, defendant HARRIS updated a webpage containing the fighting pedigree for Tee Tee, which had previously been posted on a website known as "Peds Online," to indicate that Tee Tee had won her fight against CC-1's dog and that Tee Tee had "smoked" that dog.

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

COUNT TWO
(Possession of a Dog for Use in an Animal Fighting Venture)

8. On or about June 1, 2016, in Cumberland County, in the District of New Jersey, and elsewhere, defendant

LYDELL HARRIS

knowingly possessed a dog, named "Tee Tee," for purposes of having the dog participate in an animal fighting venture, namely, an event in and affecting interstate and foreign commerce, that involves 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(b) and Title 18, United States Code, Section 49.

COUNT THREE
(Possession of a Dog for Use in an Animal Fighting Venture)

9. On or about June 1, 2016, in Cumberland County, in the District of New Jersey, and elsewhere, defendant

LYDELL HARRIS

knowingly possessed a dog, named "Death's Angel," for purposes of having the dog participate in an animal fighting venture, namely, an event in and affecting interstate and foreign commerce, that involves 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(b) and Title 18, United States Code, Section 49.

COUNT FOUR
(Possession of a Dog for Use in an Animal Fighting Venture)

10. On or about June 1, 2016, in Cumberland County, in the District of New Jersey, and elsewhere, defendant

LYDELL HARRIS

knowingly possessed a dog (Dog No. 3) for purposes of having the dog participate in an animal fighting venture, namely, an event in and affecting interstate and foreign commerce, that involves 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(b) and Title 18, United States Code, Section 49.

COUNT FIVE
(Possession of a Dog for Use in an Animal Fighting Venture)

11. On or about June 1, 2016, in Cumberland County, in the District of New Jersey, and elsewhere, defendant

LYDELL HARRIS

knowingly possessed a dog (Dog No. 4) for purposes of having the dog participate in an animal fighting venture, namely, an event in and affecting interstate and foreign commerce, that involves 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(b) and Title 18, United States Code, Section 49.

COUNT SIX

(Possession of a Dog for Use in an Animal Fighting Venture)

12. On or about June 1, 2016, in Cumberland County, in the District of New Jersey, and elsewhere, defendant

LYDELL HARRIS

knowingly possessed a dog (Dog No. 5) for purposes of having the dog participate in an animal fighting venture, namely, an event in and affecting interstate and foreign commerce, that involves 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(b) and Title 18, United States Code, Section 49.

COUNT SEVEN
(Possession of a Dog for Use in an Animal Fighting Venture)

13. On or about June 1, 2016, in Cumberland County, in the District of New Jersey, and elsewhere, defendant

LYDELL HARRIS

knowingly possessed a dog (Dog No. 6) for purposes of having the dog participate in an animal fighting venture, namely, an event in and affecting interstate and foreign commerce, that involves 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(b) and Title 18, United States Code, Section 49.

COUNT EIGHT
(Possession of a Dog for Use in an Animal Fighting Venture)

14. On or about June 1, 2016, in Cumberland County, in the District of New Jersey, and elsewhere, defendant

LYDELL HARRIS

knowingly possessed a dog (Dog No. 7) for purposes of having the dog participate in an animal fighting venture, namely, an event in and affecting interstate and foreign commerce, that involves 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(b) and Title 18, United States Code, Section 49.

COUNT NINE
(Possession of a Dog for Use in an Animal Fighting Venture)

15. On or about June 1, 2016, in Cumberland County, in the District of New Jersey, and elsewhere, defendant

LYDELL HARRIS

knowingly possessed a dog (Dog No. 8) for purposes of having the dog participate in an animal fighting venture, namely, an event in and affecting interstate and foreign commerce, that involves 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(b) and Title 18, United States Code, Section 49.

FORFEITURE ALLEGATION

16. The allegations contained in Counts One through Nine of this Indictment are incorporated by reference as though set forth in full herein for the purpose of alleging forfeiture pursuant to Title 7, United States Code, Section 2156(f); and Title 28, United States Code, Section 2461(c).

17. As a result of committing the offenses alleged in Counts One through Nine of this Indictment, the defendant,

LYDELL HARRIS

shall forfeit to the United States, pursuant to Title 7, United States Code, Section 2156(f) and Title 28, United States Code, Section 2461(c), any and all animals involved in the commission of such offenses.

A TRUE BILL


PAUL J. FISHMAN
UNITED STATES ATTORNEY

CASE NUMBER: 17-

**United States District Court
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UNITED STATES OF AMERICA

v.

LYDELL HARRIS

INDICTMENT FOR

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