

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF FLORIDA
PENSACOLA DIVISION

UNITED STATES OF AMERICA

v.

SEALED
INDICTMENT

3:19cr110/RV

SHANE PATRICK SPRAGUE
DEREK JEDIDIAH GOLSON
a/k/a "DEREK JEDIDIAH MURRAY"
HALEY COOK MURPH
DAVID LEE MOSER
and
JAMES PEEK
a/k/a "TOMMY"

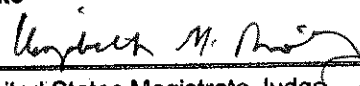
THE GRAND JURY CHARGES:

COUNT ONE

INTRODUCTION

At all times relevant to this Indictment:

1. Defendant **SHANE PATRICK SPRAGUE** was a resident of Pensacola, Florida.
2. Defendant **DEREK JEDIDIAH GOLSON, a/k/a "DEREK JEDIDIAH MURRAY,"** was a resident of Pensacola, Florida.
3. Defendant **HALEY COOK MURPH** was a resident of Milton, Florida.

Returned in open court pursuant to Rule 6(f)
9-17-19
Date

United States Magistrate Judge

4. Defendant **DAVID LEE MOSER** was a resident of Waynesboro, Tennessee.

5. Defendant **JAMES PEEK, a/k/a "TOMMY,"** was a resident of Milton, Florida.

6. An "animal fighting venture" was defined as "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).

THE CHARGE

Beginning on or about April 27, 2011, and continuing until on or about June 4, 2019, in the Northern District of Florida and elsewhere, the defendants,

**SHANE PATRICK SPRAGUE,
DEREK JEDIDIAH GOLSON,
a/k/a "DEREK JEDIDIAH MURRAY,"
HALEY COOK MURPH,
DAVID LEE MOSER,
and
JAMES PEEK,
a/k/a "TOMMY,"**

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

1. 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;

2. to possess, train, sell, purchase, 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), and Title 18, United States Code, Section 49; and

3. to use an instrumentality of interstate commerce for commercial speech for purposes of advertising an animal for use in an animal fighting venture, contrary to Title 7, United States Code, Section 2156(c), and Title 18, United States Code, Section 49.

MANNER AND MEANS OF THE CONSPIRACY

1. It was part of the conspiracy that **SHANE PATRICK SPRAGUE and DEREK JEDIDIAH GOLSON, a/k/a “DEREK JEDIDIAH MURRAY,”** created and operated “C Wood Kennels,” for the purpose of possessing, training, purchasing, selling, transporting, delivering, and receiving dogs intended for use by themselves and others in animal fighting ventures.

2. It was further a part of the conspiracy that the Defendants and others developed and maintained properties for purposes of housing and training pit bull-

type dogs intended for use by themselves and others in dog fights, and for using and storing dog fighting equipment.

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

4. It was further a part of the conspiracy that the Defendants and others acquired and maintained medical equipment, such as intravenous tubing and bags, scalpels, skin staplers, suture removers, and veterinary injectable medications, for purposes of attempting to treat dogs injured during dog fights, and to surgically remove dogs' ears prior to dog fights, without the assistance or scrutiny of a veterinarian.

5. It was further a part of the conspiracy that the Defendants and others communicated with one another by telephone, text message, 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, including in "roll" fights; the lineage or "bloodline" of certain fighting dogs; the aptitude, abilities, and fighting histories of particular fighting dogs; and drugs and equipment intended for use on fighting dogs.

6. It was further a part of the conspiracy that the Defendants and others planned to fight pit bull-type dogs in dog fights.

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

8. It was further a part of the conspiracy that the Defendants and others posted, obtained, and forwarded information about fighting dogs and their bloodlines and “pedigrees,” including from dog fighting websites.

OVERT ACTS

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:

1. Between on or about April 27, 2011, and on or about September 4, 2011, **DEREK JEDIDIAH GOLSON, a/k/a “DEREK JEDIDIAH MURRAY,”** solicited buyers of “stud” privileges for the dog “Cain,” and posted dog “pedigrees,” on the underground dog fighting website known as “Peds Online.”

2. On or about August 1, 2011, **DEREK JEDIDIAH GOLSON, a/k/a “DEREK JEDIDIAH MURRAY,”** and **JAMES PEEK, a/k/a “TOMMY,”** met and bred the dogs “Peek’s Lucky 1xW ROM” and “Golson’s Murray’s Angel” together.

3. On a date between or about October 7, 2011, and April 28, 2014, **DEREK JEDIDIAH GOLSON, a/k/a “DEREK JEDIDIAH MURRAY,”**

delivered one of the puppies from that litter, namely, "Golson's Lil Angel Eye's" [*sic*], to **SHANE PATRICK SPRAGUE**.

4. On or about October 28, 2011, **DEREK JEDIDIAH GOLSON**, a/k/a "**DEREK JEDIDIAH MURRAY**," advertised other puppies from that litter for sale on "Peds Online," based on the dogs' fighting lineage.

5. On or about December 24, 2012, **DEREK JEDIDIAH GOLSON**, a/k/a "**DEREK JEDIDIAH MURRAY**," and **SHANE PATRICK SPRAGUE**, bred dogs "Cain," owned by **SPRAGUE**, and "Kali," owned by **GOLSON**, together, both being from the bloodline of fighting dogs owned by **JAMES PEEK**, a/k/a "**TOMMY**."

6. On a date between on or about June 3, 2014, and November 20, 2014, **JAMES PEEK**, a/k/a "**TOMMY**," sold and delivered the dog "Gambit" to **DEREK JEDIDIAH GOLSON**, a/k/a "**DEREK JEDIDIAH MURRAY**."

7. On a date between or about October 22, 2015, and March 11, 2016, **SHANE PATRICK SPRAGUE** delivered the dog "Captain" to **DEREK JEDIDIAH GOLSON**, a/k/a "**DEREK JEDIDIAH MURRAY**."

8. On one or more dates between on or about January 30, 2016, and on or about December 23, 2017, **HALEY COOK MURPH** offered to and did perform veterinary and surgical procedures on dogs, including by treating dogs injured in a dog fight, and by surgically removing dogs' ears for the purpose of dog

fighting, without possessing a license to practice veterinary medicine, on behalf of **DAVID LEE MOSER, SHANE PATRICK SPRAGUE**, and “C Wood Kennels.”

9. On or about May 17, 2016, **SHANE PATRICK SPRAGUE**, utilizing an instrumentality of interstate commerce, advertised the sale of a dog based on the dog’s pedigree on “Peds Online,” and the dog’s fighting lineage.

10. On or about April 3, 2017, **SHANE PATRICK SPRAGUE**, utilizing an instrumentality of interstate commerce, advertised the sale of a dog based on the dog’s pedigree on “Peds Online,” and the dog’s fighting lineage, including on behalf of his “kennel partner,” **DEREK JEDIDIAH GOLSON, a/k/a “DEREK JEDIDIAH MURRAY.”**

11. On or about September 18, 2017, **SHANE PATRICK SPRAGUE**, utilizing an instrumentality of interstate commerce, advertised the sale of a dog based on the dog’s pedigree on “Peds Online,” and the dog’s fighting lineage, including on behalf of his “kennel partner,” **DEREK JEDIDIAH GOLSON, a/k/a “DEREK JEDIDIAH MURRAY.”**

12. On a date between on or about October 4, 2016, and on or about May 2, 2017, **HALEY COOK MURPH** took delivery of the dog “Dixie” from **SHANE PATRICK SPRAGUE** and an unindicted Co-Conspirator (hereinafter “CC”).

13. On or about October 17, 2016, **DAVID LEE MOSER** took delivery of the dog “Patch” from **SHANE PATRICK SPRAGUE** and CC.

14. On or about November 8, 2016, **DAVID LEE MOSER** created and posted fighting dog “pedigrees” on “Peds Online,” at the request of and on behalf of, **SHANE PATRICK SPRAGUE** and “C Wood Kennels.”

15. On or about January 25, 2017, **DAVID LEE MOSER** created and posted fighting dog “pedigrees” on “Peds Online,” at the request of and on behalf of, **SHANE PATRICK SPRAGUE** and “C Wood Kennels.”

16. On or about August 22, 2017, **DAVID LEE MOSER** created and posted fighting dog “pedigrees” on “Peds Online,” at the request of and on behalf of, **SHANE PATRICK SPRAGUE** and “C Wood Kennels.”

17. On or about February 19, 2017, **SHANE PATRICK SPRAGUE** sent an internet message to **DAVID LEE MOSER**, agreeing to help prepare one of his dogs for a dog fight.

18. On a date between on or about February 21, 2017, and March 25, 2017, **DEREK JEDIDIAH GOLSON, a/k/a “DEREK JEDIDIAH MURRAY,”** delivered the dog “Batman” to **SHANE PATRICK SPRAGUE**.

19. On or about March 25, 2017, **DAVID LEE MOSER and SHANE PATRICK SPRAGUE** sent internet messages to one another, agreeing to sponsor and exhibit their dogs “Orca” and “Batman” against one another in a dog fight.

20. On or about May 1, 2017, **DEREK JEDIDIAH GOLSON, a/k/a “DEREK JEDIDIAH MURRAY,”** utilizing an instrumentality of interstate commerce, advertised the sale of a dog to a potential buyer, based on the dog’s pedigree from “Peds Online,” and the dog’s fighting lineage.

21. On or about May 2, 2017, **HALEY COOK MURPH and SHANE PATRICK SPRAGUE** sent internet messages to one another, agreeing to sponsor and exhibit their dogs “Dixie” and “Maggie” in a dog fight.

22. On or about May 27, 2017, **HALEY COOK MURPH** sent text messages to **DEREK JEDIDIAH GOLSON, a/k/a “DEREK JEDIDIAH MURRAY,”** agreeing to provide him a “bait” animal, for the purpose of having his dog “Captain” attack and/or kill the animal so that he could evaluate “Captain’s” fighting temperament.

23. On or about August 9, 2016, **HALEY COOK MURPH** and **CC** arranged for a dog to attack and to kill a “bait” animal, for the purpose of evaluating and enhancing the dog’s fighting temperament.

24. On or about December 26, 2017, **DEREK JEDIDIAH GOLSON**, a/k/a “**DEREK JEDIDIAH MURRAY**,” arranged for a dog to attack and to kill a “bait” animal, for the purpose of evaluating and enhancing the dog’s fighting temperament.

25. On or about July 11, 2017, **DEREK JEDIDIAH GOLSON**, a/k/a “**DEREK JEDIDIAH MURRAY**,” sold and delivered a dog to, and accepted a wire transfer payment from, a buyer, after advertising the sale of the dog to the buyer based on the dog’s pedigree from “Peds Online,” and the dog’s fighting lineage.

26. On or about June 15, 2017, **JAMES PEEK**, a/k/a “**TOMMY**,” sold and delivered a dog to **SHANE PATRICK SPRAGUE**.

27. On or about June 20, 2017, **SHANE PATRICK SPRAGUE** sold and delivered the same dog to a person in Montana by air cargo.

28. On or about October 15, 2017, **DAVID LEE MOSER**, **HALEY COOK MURPH**, and **SHANE PATRICK SPRAGUE** exchanged internet messages in which **MOSER** agreed to deliver, and **MURPH** and **SPRAGUE**

agreed to receive, two dogs from a litter born to **MOSER**'s dogs "Orca" and "Miss Homer."

29. On or about December 28, 2017, **DEREK JEDIDIAH GOLSON**, a/k/a "**DEREK JEDIDIAH MURRAY**," and **HALEY COOK MURPH** traveled from Pensacola, Florida, and Milton, Florida, to Steele, Alabama, where they took delivery of and transported the dog "General."

30. On or about February 23, 2018, **DEREK JEDIDIAH GOLSON**, a/k/a "**DEREK JEDIDIAH MURRAY**," and **HALEY COOK MURPH** traveled from Pensacola, Florida, and Milton, Florida, to Steele, Alabama, where they took delivery of and transported the dog "King."

31. On or about June 2, 2019, **DEREK JEDIDIAH GOLSON**, a/k/a "**DEREK JEDIDIAH MURRAY**," utilizing an instrumentality of interstate commerce, agreed to sell and deliver a dog to, and accepted a wire transfer payment from, a person who was using a phone number with an Ohio area code, after soliciting the sale of the dog to the buyer based on the dog's pedigree from "Peds Online," and the dog's fighting lineage.

32. On one or more dates between on or about May 6, 2011, and on or about July 25, 2018, **SHANE PATRICK SPRAGUE** possessed dogs for purposes of having the dogs participate in an animal fighting venture.

33. On one or more dates between on or about April 27, 2011, and on or about June 4, 2019, **DEREK JEDIDIAH GOLSON, a/k/a “DEREK JEDIDIAH MURRAY,”** possessed dogs for purposes of having the dogs participate in an animal fighting venture.

34. On one or more dates between on or about May 2, 2017, and on or about July 25, 2018, **HALEY COOK MURPH** possessed dogs for purposes of having the dogs participate in an animal fighting venture.

35. On one or more dates between on or about April 27, 2011, and on or about July 25, 2018, **JAMES PEEK, a/k/a “TOMMY,”** possessed dogs for purposes of having the dogs participate in an animal fighting venture.

36. On one or more dates between on or about October 17, 2016, and on or about June 4, 2019, **DAVID LEE MOSER** possessed dogs for purposes of having the dogs participate in an animal fighting venture.

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

COUNT TWO

A. INTRODUCTION

The allegations set forth in Count One, paragraphs one through six, of this Indictment are hereby realleged and incorporated by reference.

B. THE CHARGE

On or about July 11, 2017, **DEREK JEDIDIAH GOLSON, a/k/a “DEREK JEDIDIAH MURRAY,”** in the Northern District of Florida and elsewhere, knowingly sold and delivered a dog in interstate commerce, for purposes of having the dog participate in an animal fighting venture, in violation of Title 7, United States Code, Section 2156(b), and Title 18, United States Code, Sections 49 and 2.

COUNT THREE

A. INTRODUCTION

The allegations set forth in Count One, paragraphs one through six, of this Indictment are hereby realleged and incorporated by reference.

B. THE CHARGE

On or about December 28, 2017, **DEREK JEDIDIAH GOLSON, a/k/a “DEREK JEDIDIAH MURRAY,”** traveled from Pensacola, Florida, to Steele, Alabama, where he knowingly received and transported the dog “General” back to Pensacola, Florida, for purposes of having the dog participate in an animal fighting venture, in violation of Title 7, United States Code, Section 2156(b), and Title 18, United States Code, Sections 49 and 2.

COUNT FOUR

The allegations set forth in Count One, paragraphs one through six, of this Indictment are realleged as if fully set forth herein.

On or about February 23, 2018, **HALEY COOK MURPH** traveled from Milton, Florida, to Steele, Alabama, where she knowingly received and transported the dog “King” back to Pensacola, Florida, for purposes of having the dog participate in an animal fighting venture, in violation of Title 7, United States Code, Section 2156(b), and Title 18, United States Code, Sections 49 and 2.

COUNT FIVE

A. INTRODUCTION

The allegations set forth in Count One, paragraphs one through six, of this Indictment are hereby realleged and incorporated by reference.

B. THE CHARGE

On or about June 20, 2017, **SHANE PATRICK SPRAGUE**, in the Northern District of Florida and elsewhere, knowingly sold and delivered a dog by air cargo to a person in Montana, for purposes of having the dog participate in an animal fighting venture, in violation of Title 7, United States Code, Section 2156(b), and Title 18, United States Code, Sections 49 and 2.

COUNT SIX

A. INTRODUCTION

The allegations set forth in Count One, paragraphs one through six, of this Indictment are hereby realleged and incorporated by reference.

B. THE CHARGE

On or about January 17, 2018, **JAMES PEEK, a/k/a “TOMMY,”** in the Northern District of Florida and elsewhere, knowingly sold and delivered a dog for purposes of having the dog participate in an animal fighting venture, to an undercover Federal agent, in violation of Title 7, United States Code, Section 2156(b), and Title 18, United States Code, Sections 49 and 2.

COUNT SEVEN

A. INTRODUCTION

The allegations set forth in Count One, paragraphs one through six, of this Indictment are hereby realleged and incorporated by reference.

B. THE CHARGE

On or about June 2, 2019, **DEREK JEDIDIAH GOLSON, a/k/a “DEREK JEDIDIAH MURRAY,”** in the Northern District of Florida and elsewhere, knowingly used an instrumentality of interstate commerce, namely, text messages to a person in Ohio, for commercial speech for purposes of advertising an animal for use in an animal fighting venture.

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

COUNTS EIGHT THROUGH FOURTEEN

A. INTRODUCTION

The allegations set forth in in Count One, paragraphs one through six, of this Indictment are hereby realleged and incorporated by reference.

B. THE CHARGE

On or about one or more of the dates set forth below, **SHANE PATRICK SPRAGUE**, in the Northern District of Florida, and elsewhere, knowingly possessed dogs for purposes of having the dogs participate in an animal fighting venture, namely:

Count	Dog / Inventory #	Dates
8	“Jethro,” USM 2A-1	June 26, 2016, to July 25, 2018
9	“Beastie,” USM 2A-2	July 25, 2018
10	“Elvira,” USM 2A-3	July 25, 2018
11	“McGregor,” USM 2A-4	September 12, 2017, to July 25, 2018
12	“Maggie,” USM 2A-5	May 2, 2017, to July 25, 2018
13	“Cain,” USM 2LS-1	November 1, 2014, to July 25, 2018
14	“Angel” or “Golson’s Lil’ Angel Eye’s,” USM 2A-6	November 1, 2014, to July 25, 2018

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

COUNTS FIFTEEN THROUGH TWENTY-ONE

A. INTRODUCTION

The allegations set forth in Count One, paragraphs one through six, of this Indictment are hereby realleged and incorporated by reference.

B. THE CHARGE

On or about one or more of the dates set forth below, **DEREK JEDIDIAH GOLSON, a/k/a “DEREK JEDIDIAH MURRAY,”** in the Northern District of Florida and elsewhere, knowingly possessed dogs for purposes of having the dogs participate in an animal fighting venture, namely:

Count	Dog / Inventory #	Dates
15	“Amaya,” USM-1	December 18, 2018, to June 4, 2019
16	“General,” USM-2	December 28, 2017, to June 4, 2019
17	“Georgia,” USM-3	June 9, 2018, to June 4, 2019
18	“Porter,” USM-4	March 4, 2017, to June 4, 2019
19	“Kali,” USM-5	November 1, 2014, to June 4, 2019
20	“Captain,” USM-6	March 11, 2016, to June 4, 2019
21	“Rascal,” USM-7	May 9, 2019, to June 4, 2019

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

COUNTS TWENTY-TWO THROUGH TWENTY-FOUR

A. INTRODUCTION

The allegations set forth in Count One, paragraphs one through six, of this Indictment are hereby realleged and incorporated by reference.

B. THE CHARGE

On or about one or more of the dates set forth below, **HALEY COOK MURPH**, in the Northern District of Florida and elsewhere, knowingly possessed dogs for purposes of having the dogs participate in an animal fighting venture, namely:

Count	Dog / Inventory #	Dates
22	“King,” USM-A-1	February 23, 2018, to July 25, 2018
23	“Minya” or Armenia,” USM-A-3	July 25, 2018
24	“Dixie,” USM-A-5	May 2, 2017, to July 25, 2018

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

COUNTS TWENTY-FIVE THROUGH FORTY-FOUR

A. INTRODUCTION

The allegations set forth in Count One, paragraphs one through six, of this Indictment are hereby realleged and incorporated by reference.

B. THE CHARGE

On or about one or more of the dates set forth below, **JAMES PEEK, a/k/a “TOMMY,”** in the Northern District of Florida and elsewhere, knowingly possessed dogs for purposes of having the dogs participate in an animal fighting venture, namely:

Count	Dog / Inventory #	Dates
25	USM 1A-1	July 25, 2018
26	USM 1A-7	July 25, 2018
27	“Harley Quinn,” USM 1A-8	March 25, 2016, to July 25, 2018
28	USM 1A-9	July 25, 2018
29	USM 1B-1	July 25, 2018
30	“Jericho Johnny,” USM 1B-2	November 1, 2014, to July 25, 2018
31	USM 1B-3	July 25, 2018
32	USM 1B-4	July 25, 2018
33	USM 1B-5	July 25, 2018
34	USM 1B-6	July 25, 2018
35	USM 1B-7	July 25, 2018
36	USM 1B-8	July 25, 2018
37	USM 1B-9	July 25, 2018
38	USM 1B-10	July 25, 2018
39	“Reba Mac,” USM 1B-11	November 1, 2014, to July 25, 2018
40	USM 1B-12	July 25, 2018
41	USM 1B-13	July 25, 2018
42	USM 1B-14	July 25, 2018
43	USM 1B-15	July 25, 2018
44	“Jack,” USM 1B-16	February 14, 2017, to July 25, 2018

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

CRIMINAL FORFEITURE

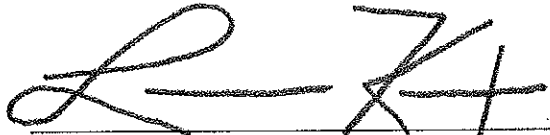
The allegations contained in Counts One through Forty-Four are hereby realleged and incorporated by reference for the purpose of alleging forfeiture to the United States pursuant to the provisions of Title 7, United States Code, Section 2156(f), in conjunction with Title 28, United States Code, Section 2461(c).

Upon conviction of the offenses in Counts One through Forty-Four of the Indictment, and pursuant to Title 7, United States Code, Section 2156(f), in conjunction with Title 28, United States Code, Section 2461(c), the defendants

**SHANE PATRICK SPRAGUE,
DEREK JEDIDIAH GOLSON,
a/k/a "DEREK JEDIDIAH MURRAY,"
HALEY COOK MURPH,
DAVID LEE MOSER,
and
JAMES PEEK,
a/k/a "TOMMY,"**

shall forfeit to the United States any animals involved in a violation of the animal fighting prohibitions of the federal Animal Welfare Act, Title 7, United States Code, Section 2156.

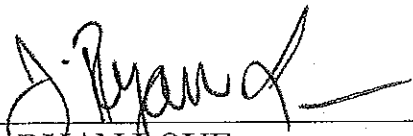
TRUE BILL:



LAWRENCE KEEFFE
United States Attorney

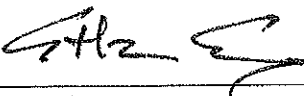
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FOREPERSON ✓



J. RYAN LOVE
Assistant United States Attorney

9-17-2019
DATE



ETHAN EDDY
Trial Attorney