

# AFFIDAVIT FOR SEARCH WARRANT

Commonwealth of Virginia VA. CODE § 19.2-54

The undersigned Applicant states under oath:

1. A search is requested in relation to an offense substantially described as follows:

Virginia State Code Section 3.1-796.124.

Dog Fighting.

CONTINUED ON ATTACHED SHEET

2. The place, person or thing to be searched is described as follows:

The entire residence and curtilage located at [REDACTED], in the County of Henrico, Virginia. [REDACTED] is a tri-level, single-family dwelling, white in color with black shutters, with a red brick front porch. The numbers [REDACTED] are clearly posted above the front door of the residence.

CONTINUED ON ATTACHED SHEET

3. The things or persons to be searched for are described as follows:

Evidence related to the crime of dog fighting to include but not limited to: animals; alive, dead, unborn. Rabies inoculation records and tags, license records for animals, animal ownership records, animal care products, veterinary records, veterinary medications and supplies, dog training paraphernalia, pictures, certificates, awards, videos, DVD(s), CD(s), computer files and/or programs.

CONTINUED ON ATTACHED SHEET

(OVER)

CASE NO.

## AFFIDAVIT FOR SEARCH WARRANT

APPLICANT:

[REDACTED]  
NAME

Detective  
TITLE (IF ANY)

[REDACTED]  
ADDRESS

Richmond, Virginia 23220

Certified to Clerk of

Henrico Circuit Court  
CITY OR COUNTY

on ~~18 July 2009~~  
DATE

Magistrate TITLE [REDACTED] SIGNATURE

Delivered  in person  certified mail to Clerk of

Circuit Court  
CITY OR COUNTY

on \_\_\_\_\_  
DATE

\_\_\_\_\_  
TITLE

\_\_\_\_\_  
SIGNATURE

4. The material facts constituting probable cause that the search should be made are:  
SEE ATTACHED.

x CONTINUED ON ATTACHED SHEET

5. The object, thing or person searched for constitutes evidence of the commission of such offense.

6. x I have personal knowledge of the facts set forth in this affidavit OR

x I was advised of the facts set forth in this affidavit in whole or in part, by an informer. This informer's credibility or the reliability of the information may be determined from the following facts:

SEE ATTACHED.

The statements above are true and accurate to the best of my knowledge and belief.

x CONTINUED ON ATTACHED SHEET

Detective

TITLE OF APPLICANT

 # 

APPLICANT

Subscribed and sworn to before me this day.

7/18/09 @ 1935 hrs

DATE AND TIME



CLERK  MAGISTRATE  JUDGE

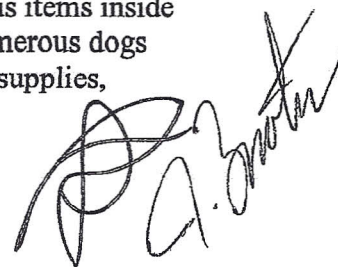
4. **The material facts constituting probable cause that the search should be made are:**

In August of 2008, the City of Richmond Police Department Narcotics Unit began an investigation into the illegal drug trafficking activities of [REDACTED]. During the course of this investigation it has been determined that [REDACTED] is a mid-level to upper-level trafficker of cocaine base (i.e. crack cocaine) in the Church Hill area of Richmond (VA). During the same time frame of the narcotics investigation, [REDACTED] was the "target" of a separate dog fighting investigation by Officers from the Richmond Animal Care and Control Unit. The investigation by Animal Control Officers revealed that [REDACTED] is involved in organized dog fighting throughout the Commonwealth of Virginia with numerous other known and unknown individual(s).

[REDACTED] is a black male born on October [REDACTED], 1969. [REDACTED] is approximately 5'8" in height and weighs approximately two hundred-fifty (250) pounds. A conducted a Computerized Criminal History Check (CCH) on [REDACTED] revealed that he has been arrested on numerous occasion(s) in and around the Richmond (VA) area. In 1990, [REDACTED] was convicted of 2<sup>nd</sup> Degree Murder and Use of a Firearm in the Commission of a Felony. In 2003, [REDACTED] was arrested and convicted for possessing marijuana. In June of 2008, [REDACTED] was arrested for possessing with the intent to distribute and simple possession of illegal narcotic(s). The 2008 narcotics charge(s) were subsequently *nolle prossed* by the Richmond Commonwealth Attorney's Office.

During the course of both investigations, investigators were able to determine that [REDACTED] is the "primary" residence of [REDACTED]. [REDACTED] resides at the residence with his fiancée ([REDACTED]) and several small children.

On June 2, 2009, at approximately 1450 hours, Richmond Police Officer(s) responded to the area of North 23<sup>rd</sup> Street and Fairfield Avenue for the report of a person shot. When officer(s) arrived on the scene, they observed a male suffering from approximately twelve (12) gunshot wounds. Shortly after this incident occurred, Richmond and Henrico County Police Investigators made contact with [REDACTED] and [REDACTED] at [REDACTED]. Investigators had received reliable information that implicated [REDACTED]'s involvement in this incident. Investigators secured the residence of [REDACTED] and detained [REDACTED] and [REDACTED]. Your affiant applied for and was granted a search warrant from a Henrico County Magistrate to search the residence for evidence of the shooting that had just occurred. During a search of the residence investigators seized two (2) firearms, ammunition, digital scales with narcotics residue, documents, over \$50,000.00 of United States Currency, and two (2) vehicles. Investigators also observed (but did not seize) numerous items inside the residence and on the curtilage to include: a dog treadmill, numerous dogs including two (2) Pit Bull type dogs, veterinary medications and supplies,



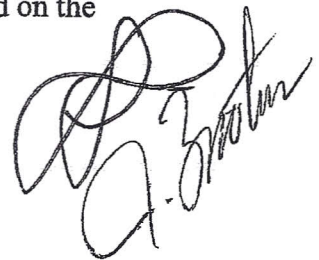
syringes, dog magazines, documents denoting dog lineage, pictures of Pit Bull type dogs, and various dog certificates listing the names of various dogs. The item(s) observed that are consistent with illegal dog fighting were not seized due to the fact that your affiant was unaware of the investigation being conducted by Animal Control Officers.

After the search of the residence was complete, [REDACTED] was arrested and charged with possession of a firearm by a convicted felon. [REDACTED] was held without bond by a Henrico County Magistrate.

On or about June 16, 2009, Richmond Animal Control Officers executed a search warrant at [REDACTED] in the City of Richmond (VA). The "target" of this search warrant was a male known as [REDACTED] aka "[REDACTED]." During a search of the residence and curtilage, officers seized numerous Pit Bull type dogs, numerous items associated with illegal dog fighting, and evidence of illegal drug trafficking activity. Officers also recovered evidence that links [REDACTED] to ownership of some of the dogs that were seized from the residence. Further, information gathered by your affiant during the narcotics investigation leads me to believe that [REDACTED] and [REDACTED] were working together to traffic illegal drugs as well as participating in illegal organized dog fighting.

On or about June 17, 2009, Richmond Animal Control Officers obtained arrest warrant(s) for [REDACTED] and [REDACTED] based on evidence recovered from the search of [REDACTED]'s residence. [REDACTED] and [REDACTED] both served with their respective warrant(s) a few days later. [REDACTED] has been held without bond since the day of his arrest and [REDACTED] has been held without bond since his arrest on June 2, 2009. Further, [REDACTED]'s firearms charge was *nolle prossed* by the Henrico County Commonwealth Attorney's Office. This charge has since been adopted by the United States Attorney's Office. [REDACTED] is currently being held on a federal detainer.

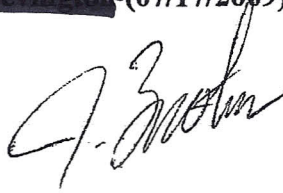
In July of 2009, your affiant was contacted by Officer [REDACTED] of Richmond Animal Control. Officer [REDACTED] had learned that your affiant was conducting a narcotics investigation on the same "target(s)" as her dog fighting investigation. On July 16, 2009, your affiant met with Officer [REDACTED] and other investigators to share information that had been gathered in both investigations. Your affiant told Officer [REDACTED] about the items related to dog fighting that were observed (and not seized) at [REDACTED] on June 2, 2009. Officer [REDACTED] informed your affiant that all of those item(s) are very valuable pieces of "evidence" in the dog fighting case against [REDACTED]. Your affiant informed Officer [REDACTED] that [REDACTED] has been incarcerated since the day of his arrest and that I believed that all the item(s) observed should still be present in the residence and on the curtilage.



On July 16, 2009, Officer [REDACTED] went to [REDACTED] in order to confirm or dispel that evidence of illegal dog fighting was still present. On the curtilage of the residence, Officer [REDACTED] observed two (2) scales used to weigh "fighting" dogs, a "boomer" ball (exercise equipment used to train "fighting" dogs), and two (2) Pit Bull type dogs attached to heavy chains.

Based on the information provided in this affidavit, I respectfully submit that evidence supporting the crime of illegal dog fighting will be recovered from inside [REDACTED] as well as the curtilage of the residence.

 # [REDACTED]  
Affiant: [REDACTED] (07/17/2009)



6. I was advised of the facts set forth in this affidavit, in whole or in part, by an informer. This informer's credibility or the reliability of the information may be determined from the following facts:

Your affiant, Detective [REDACTED] has been a City of Richmond Police Officer for approximately eight (8) years. I am currently assigned to the Special Investigations Division (SID) Narcotics Unit and have been assigned to various specialized narcotics units for approximately six (6) of these eight (8) years.

Officer [REDACTED] has worked for Richmond Animal Care and Control for several years. Officer [REDACTED] has conducted numerous investigations into illegal dog fighting. Officer [REDACTED] is a recognized expert in the evaluation of fighting dogs. Officer [REDACTED] is also a member of a statewide dog fighting taskforce. This taskforce investigates illegal dog fighting "organization(s)" throughout the Commonwealth of Virginia. Officer [REDACTED] is familiar with the ways and means used by individual(s) involved in illegal dog fighting to breed and "train" dogs to fight. Further, Officer [REDACTED] is familiar with the items and equipment that individual(s) involved in illegal dog fighting commonly possess at their "primary" residence(s), kennel(s), and any other place(s) "fighting" dogs are bred, kept, and trained.

Based on the information provided in this affidavit, I respectfully submit that evidence supporting the crime of illegal dog fighting will be recovered from inside [REDACTED] as well as the curtilage of the residence.

Affiant: [REDACTED] # [REDACTED]  
[REDACTED] (07/17/2009)

