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AO 91 (Rev. 11/11) Criminal Complaint

FILED ENTERED
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11:48 am, Sep 26 2023

UNITED STATES DISTRICT COURT
for the
District of Maryland

AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BY _____ Deputy

United States of America)
v.)
FREDERICK DOUGLASS MOOREFIELD, JR. a/k/a)
"GEEHAD KENNELS",)
MARIO DAMON FLYTHE a/k/a "RAZOR SHARP)
KENNELS")

1:23-mj-02494-BAH
Case No. 1:23-mj-02495-BAH

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.


On or about the date(s) of Nov. 22, 2018 - Sept. 6, 2023 in the county of Anne Arundel in the
_____ District of Maryland, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
7 U.S.C. § 2156(b), (c); 18 U.S.C. §§ 49(a), 371, and 1952	Buying, selling, delivering, possessing, training, or transporting animals for participation in an animal fighting venture; Use of postal service or other interstate instrumentality for promoting or furthering an animal fighting venture; Conspiracy to sponsor or exhibit an animal in an animal fighting venture; and Interstate and foreign travel or transportation in aid of racketeering enterprises

This criminal complaint is based on these facts:

See affidavit.

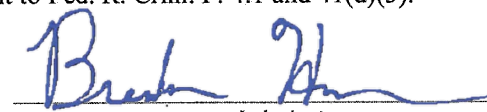
Continued on the attached sheet.


Complainant's signature

Ryan C. Daly, Special Agent
Printed name and title

Sworn to before me over the telephone and signed by me pursuant to Fed. R. Crim. P. 4.1 and 41(d)(3).

Date: September 21, 2023


Judge's signature



City and state: Baltimore, Maryland

Brendan A. Hurson, United States Magistrate Judge
Printed name and title

✓ FILED _____ ENTERED _____
LOGGED _____ RECEIVED _____
10:03 am, Sep 29 2023
AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BY _____ Deputy

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND SEARCH WARRANT

I, Ryan C. Daly, Special Agent of the Federal Bureau of Investigation (“FBI”), being duly sworn, depose and state that:

1. This Affidavit is made in support of a criminal complaint and arrest warrants for Frederick Douglass Moorefield, Jr. (“MOOREFIELD”), born in 1960, [REDACTED] Arnold, Maryland 21012 (the “Dividing Creek Premises”), and Mario Damon Flythe (“FLYTHE”), born in 1974, residing on Magnolia Road, Glen Burnie, Maryland 21061 (the “Magnolia Premises”), for violations of Title 7, United States Code, Section 2156(b) and Title 18, United States Code, Section 49(a), Buying, Selling, Delivering, Possessing, Training, or Transporting Animals for Participation in an Animal Fighting Venture; Title 7, United States Code, Section 2156(c) and Title 18, United States Code, Section 49(a), Use of Postal Service or Other Interstate Instrumentality for Promoting or Furthering an Animal Fighting Venture; Title 18, United States Code, Section 371, Conspiracy to Sponsor or Exhibit an Animal in an Animal Fighting Venture; and Title 18, United States Code, Section 1952, Interstate and Foreign Travel or Transportation in Aid of Racketeering Enterprises (collectively, the “TARGET OFFENSES”).

2. This Affidavit is also made in support of an application for a search and seizure warrant to perform a narrowly targeted search of the premises located at [REDACTED] Arnold, Maryland 21012 for evidence of violations of the TARGET OFFENSES, more fully described in Attachment A-1.

AGENT BACKGROUND

3. I am a Special Agent with the FBI and have been since 2015. As a Special Agent with the FBI, I am authorized to investigate crimes involving violations of federal law. I am currently assigned to investigate matters involving healthcare fraud and environmental offenses. As a result

of my training and experience, I am familiar with tactics and methods used by individuals who engage in environmental crimes such as dogfighting.

4. I am familiar with the facts set forth in this Affidavit based on my personal observations, my training and experience, my review of documents, and information obtained from witnesses and other law enforcement personnel participating in this investigation.

5. Because this Affidavit is being filed in support of the aforementioned criminal complaint, it contains information sufficient to meet the standard of probable cause but does not include all the information known by the Affiant and the Government related to the underlying investigation.

ELEMENTS OF THE TARGET OFFENSES

6. As set forth below, there is probable cause to believe that MOOREFIELD and FLYTHE committed violations of the TARGET OFFENSES. This section of the Affidavit is intended to summarize the elements of each of the TARGET OFFENSES. As used below and as defined by Title 7, United States Code, Section 2156(f), the term “animal fighting venture” refers to “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,” with the exception of the use of animals for hunting purposes.

7. Title 7, United States Code, Section 2156(b), Buying, Selling, Delivering, Possessing, Training, or Transporting Animals for Participation in an Animal Fighting Venture, states that “[i]t shall be unlawful for any person to knowingly sell, buy, possess, train, transport, deliver, or receive any animal for purposes of having the animal participate in an animal fighting venture.” Title 18, United States Code, Section 49(a) defines the applicable penalties for violations of Title 7, United States Code, Section 2156(b).

8. Title 7, United States Code, Section 2156(c), Use of Postal Service or Other Interstate Instrumentality for Promoting or Furthering an Animal Fighting Venture, states that “[i]t shall be unlawful for any person to knowingly use . . . any instrumentality of interstate commerce for commercial speech for purposes of advertising an animal . . . for use in an animal fighting venture, promoting, or in any other manner furthering an animal fighting venture . . .” Title 18, United States Code, Section 49(a) defines the applicable penalties for violations of Title 7, United States Code, Section 2156(c).

9. Title 18, United States Code, Section 371, Conspiracy to Sponsor or Exhibit an Animal in an Animal Fighting Venture, states that it shall be unlawful for “two or more persons” to conspire to sponsor or exhibit an animal in an animal fighting venture.

10. Title 18, United States Code, Section 1952, Interstate and Foreign Travel or Transportation in Aid of Racketeering Enterprises, makes it unlawful to “travel[] in interstate or foreign commerce or use[] the mail or any facility in interstate or foreign commerce, with intent to . . . promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on, of any unlawful activity” and then perform any of those actions. Section 1952(b) defines “unlawful activity” to include “any business enterprise involving gambling . . . offenses in violation of the laws of the State in which they are committed or of the United States.”

PROBABLE CAUSE

11. MOOREFIELD is a 62-year-old Department of Defense employee and dogfighter. According to his Department of Defense biography page, MOOREFIELD is the Deputy Chief Information Officer for Command, Control, and Communications (C3), Office of the Secretary of Defense, Chief Information Officer. As DCIO, MOOREFIELD provides technical expertise,

oversight and broad guidance on policy, programmatic, and technical issues relating to C3 to integrate and synchronize defense-wide communications programs. He also advises on efforts to achieve and maintain information dominance for the Department of Defense. He manages efforts defining Department of Defense policies and strategies for design, architecture, interoperability standards, capability development and sustainment of critical command and control and communications for non-nuclear strategic strike, integrated missile defense, Defense and National Leadership Command Capabilities, and spectrum.

12. MOOREFIELD resides at the Dividing Creek Premises. According to real estate records of Anne Arundel County, MOOREFIELD is the owner of the Dividing Creek Premises, and he was present at the Dividing Creek Premises when agents executed search warrants there on September 6, 2023.

13. FLYTHE is a 49-year-old barber. According to FLYTHE's Maryland Department of Motor Vehicles driver's license, FLYTHE resides at the Magnolia Premises, which is approximately 10 miles from MOOREFIELD's residence in Arnold, Maryland. He was present at the Magnolia Premises when agents executed search warrants there on September 6, 2023.

I. The DMV Board

14. On August 23, 2022, a grand jury in the Eastern District of Virginia (EDVA) returned an indictment charging Derek Garcia, Michael Hilliard, Shaborn Nesbitt, Ricardo Thorne, LaRon West, Charles Williams, III, and Tarry Jeron Wilson, with conspiring with Carlos Harvey and Rodriguez Norman to engage in an animal fighting venture, in violation of 7 U.S.C. § 2156 and 18 U.S.C. §§ 49 and 371, and related substantive animal fighting charges. I am familiar with the facts that supported the return of that indictment.

15. Of the defendants charged in that indictment, Nesbitt has not yet appeared on the charges in EDVA, because he is in custody in the Eastern District of North Carolina after entering a guilty plea for unrelated drug charges there. The other defendants each entered guilty pleas, admitted to engaging in the animal fighting venture alleged in the indictment, and were subsequently sentenced for their roles in the conspiracy.

16. Pursuant to their guilty pleas, Garcia, Hilliard, Thorne, West, Williams, and Wilson each admitted that they used the secure messaging app known as “Telegram” to create and use private groups that they generally referred to as “the DMV Board” or “the Board,” where they and their associates could discuss training fighting dogs, exchange videos about dogfighting, and arrange and coordinate dogfights and associated wagers, all away from the view of law enforcement authorities. Each admitted that they and the other members of the DMV Board also used the Telegram app to compare methods of killing dogs that lost fights, as well as to circulate media reports about dogfighters who had been caught by law enforcement and discuss methods to conceal their own conduct from law enforcement.

17. Based on the facts set forth in the indictment, the DMV Board contained as many as 28 members at one time. As the prosecutions of the seven defendants named in the indictment have proceeded, I have continued to try to identify other members of the DMV Board and others associated with the conspiracy to engage in an animal fighting venture. In the course of those efforts, I have found that MOOREFIELD is associated with the conspiracy to engage in animal fighting ventures, is linked to members of the DMV Board, and that his kennel name is “Geehad.” I have found that, while using the Telegram app, MOOREFIELD and others used “Geehad” to refer to himself.

18. On June 28, 2020, Garcia posted to the DMV Board the results of five separate fights, including at least four involving dogs owned by members of the DMV Board. The dogfighters identified by Garcia in those posts as having fought included:

	<u>Kennel Name</u>	v.	<u>Kennel Name</u>
Fight 1	City Limits	v.	Dog Father
Fight 2	G-Code	v.	Geehad
Fight 3	Tha Goons	v.	Stackhouse
Fight 4	Tap Out	v.	Latino Family
Fight 5	City Limits	v.	Tap Out

“City Limits” was the kennel name used by DMV Board member Tarry Jeron “TJ” Wilson. “G-Code” and “Tha Goons” are kennel names used by other DMV Board members who have not yet been charged.

19. According to Garcia’s post to the DMV Board, the dog owned by G-Code Kennels was declared the winner of the fight on June 28, 2020, when, at the one hour and 13 minutes mark, the dog owned by “Geehad Kennels” could not move. As explained below, MOOREFIELD is “Geehad Kennels.”

II. MOOREFIELD is a Dogfighter Known as “Geehad Kennels.”

20. In April 2023, I received records from Verizon showing that, since 2004, “Frederick Moorefield” has been the subscriber for the phone number [REDACTED]-2434.

21. During the course of this investigation, the FBI and other law enforcement entities seized electronic devices and electronic accounts used by several DMV Board members. I found the number [REDACTED]-2434 as a number in the contacts lists of Harvey, West, and Williams. According to Harvey’s contact list, the number belonged to “Geehad Fred”; according to West’s contact list, the number belonged to “Fred M”; and according to Williams’s contact list, the number

belonged to “G-Hard Dog Fred.” I believe that Williams spelled the name of MOOREFIELD’s kennel “G-Hard” rather than “Geehad” because Williams heard the name before seeing it in print.¹

22. On January 15, 2019, during a consensually monitored call between a convicted dogfighter (referenced herein as “CW1”) and phone number [REDACTED]-2434, the user of [REDACTED]-2434 identified himself as “Geehad,” and CW1 addressed him as “Fred.” In the course of the call, CW1 asked Geehad/Fred whether Geehad/Fred had been in touch with “Manny.” Geehad/Fred said that he had not been in touch with Manny since “they [took] all of his joints.” In this context I know the term “joints” is referring to dogs trained for fighting. Further, based on the context of the conversation, I know that “Manny” referred to Manny Powe, whose fighting dogs were seized by investigators in July 2018. Based on my understanding of the call, I know that CW1 was speaking with MOOREFIELD.

23. In November 2018, Anne Arundel County Animal Control responded to a report of two dead dogs in a plastic dog food bag in Annapolis, Maryland. The location where the dogs were found was approximately six miles from MOOREFIELD’s residence in Arnold, Maryland. In addition to the dogs in the bag, investigators found mail inside the bag that was addressed to MOOREFIELD at the Dividing Creek Premises. The dogs had wounds and scarring patterns that were consistent with dogfighting. I conclude from the contents of the bag that MOOREFIELD disposed of dead fighting dogs along with other pieces of his trash.

24. My colleagues at United States Department of Agriculture requested the American Society for the Prevention of Cruelty to Animals (“ASPCA”) perform a necropsy to determine the cause of death of the two dogs recovered on or around November 22, 2018. Although ASPCA

¹ Based upon my review of Williams’s phone and iCloud account, Williams included the word “dog” in the names of those of his contacts that he identified as fellow dogfighters.

was not able to definitively determine the cause of their deaths, the distribution and number of recent and healed dog bite wounds (scars) present on both dogs was consistent with organized dogfighting. Based on this information, I believe that MOOREFIELD sponsored each of these dogs in a dogfight. Furthermore, based on my training and experience, individuals who sponsor dogs for dogfighting often kill dogs that lose a fight, and as a result of these fights, I believe the dogs were killed during the fight or that MOOREFIELD killed each of them afterwards for performing poorly.

25. My conclusions regarding MOOREFIELD's involvement in dogfighting are corroborated by a dogfighter (referenced herein as "CW2") whose dog yard was raided by law enforcement authorities in 2018; CW2 subsequently pled guilty in EDVA to engaging in dogfighting and, for over a year, cooperated with investigators. Much of CW2's information was independently corroborated, and no information he provided was determined to be untrue.

26. In 2018, CW2 told the FBI that, in or around 2009, he entered a dog into a fight against one of MOOREFIELD's dogs. CW2 said that MOOREFIELD's dog won the fight. Based on records obtained from Facebook in connection with the investigation of CW2, I know that CW2 maintained a relationship with MOOREFIELD via Facebook starting in July 2014 and lasting for at least 4 years.

27. In July 2023, pursuant to search warrants, I received from Apple, Inc. records of MOOREFIELD's iCloud account and those of other dogfighters' iCloud accounts. These records contained a WhatsApp conversation between MOOREFIELD and "BIG HOMIE," who I know to be identifiable as Larry Alston (on the DMV dogfighting board, Alston was known as "Big Goon" of "tha Goons Kennel" – one of the above-referenced DMV Board members in the fights from June 28, 2020). MOOREFIELD and Alston communicated privately through WhatsApp between

January 2019 and March 2020. Most of their conversations pertained to dogfighting. For example, in February 2019, MOOREFIELD sent Alston a text that stated, “You got a 39 bitch to hook”² for “\$3000.” Based on my knowledge and experience, I know MOOREFIELD was canvassing his dogfighting associates to see if they had a 39-pound female to fight against one of MOOREFIELD’s other dogfighting associates in Pittsburgh, PA for a bet of \$3,000.

28. Furthermore, in July 2019, MOOREFIELD asked Alston, “You got anything hot to look at yo....I got two males and two hoes....40 m 40 b 35 m 35 b.” Alston replied, “35m Already on right....MDK got 1.” A month later, MOOREFIELD canvassed Alston a second time to fight some dogs when he said, “Looking to roll 40b, 35b, 35m all on and crackin.”

29. MOOREFIELD’s last WhatsApp message to Alston was in March 2020 that contained a link to a news article that featured a Columbia, South Carolina man convicted on federal dogfighting charges.

30. Apple iCloud records reflect that, in April 2022, MOOREFIELD participated in a private WhatsApp conversation with a dogfighting associate named “Rio.” On April 16, 2022, MOOREFIELD told Rio, “Good luck today” because Rio was participating in his own dogfight. MOOREFIELD followed up and said, “I have to ref one in Bmore tonight,” which I know to mean that MOOREFIELD refereed a dogfight in Baltimore.

31. In a separate, private WhatsApp conversation with Rio in May 2022, MOOREFIELD directed Rio to “Add my partner to the board Bro” in Telegram. In this conversation MOOREFIELD’s partner was “Lonzo Most Recent,” who I know to be identifiable as Alonzo Reed, a dogfighting associate of MOOREFIELD’s (I know “Lonzo” to be a nickname Reed uses).

² Based on my training and experience, a “hook” refers to a confirmed arrangement between dogfighters to fight two dogs for an agreed-upon bet.

MOOREFIELD further described Reed as his “partner that was in the box with the 43m when we went in with you.” I understand that comment to mean that MOOREFIELD and Reed sponsored a 43-pound male dog against Rio. The text message string included Rio’s characterization of the fight as when MOOREFIELD and Reed “whoop my ass.”

32. The dogfighters posted the names, photos, and lineages of their fighting dogs on an online site that tracked pedigrees of fighting dogs. That website, Pedigrees Online, can be found at www.abpt.online-pedigrees.com, and requires users to pay for an annual subscription for full access to the site. For dogs whose pedigrees are tracked on that website, entries will reflect the owner of the dog; the breeder of the dog; when the pedigree was first posted; and when it was last modified. Information for each dog often includes references to their success in dogfights (for example, “1XW” refers to a dog that has won an official dogfight) and may include information specific to that dog or its owner.

33. I looked at the Pedigrees Online website and found entries for the following dogs, among multiple others, claimed to be owned by “Geehad” and/or “Bushboy” (another nickname I know to be used by Alonzo Reed).

Dog Name	Last Modified	First Posted
Geehad Kennels Yocum (2X)	10/14/02	8/26/02
Geehad Kennels Stand	8/20/05	8/15/02
CH Geehad Kennels Black Rascal (Meade’s Rascal)	2/4/05	10/22/02
Geehad Kennels Opal	8/22/05	6/1/03
Geehad Kennels Method Man 2XW	10/25/04	10/25/04
Geehad Kennels Monsters !!	12/24/07	12/22/07
Geehad Kennels Roscoe	6/9/08	6/9/08
Geehad & Bushboy’s Pebbles 1XW & 1OTC	2/28/21	2/27/21
Bushboy & Geehad’s Panfilo 2XW AKA Jacknife	6/14/21	3/3/21
Bushboy & Geehad’s Hazel 1XW	5/8/22	3/23/21

34. In addition to the pedigrees that I found online, I found in MOOREFIELD's iCloud account multiple screen captures for other pedigrees for fighting dogs belonging to MOOREFIELD and Reed. Specifically, I found the below pedigrees for "Bushboy & Geehad":

Dog Name	Last Modified	First Posted
Bushboy & Geehad's MoneyBag	10/9/21	10/9/21
Bushboy and Geehad's Okoye	10/9/21	10/9/21
Bushboy and Geehad's CrazyGirl	10/10/21	10/10/21
Geehad & Bushboy's Kane	3/6/21	3/6/21
Bushboy & Geehad's Roy	2/26/21	2/26/21
Bushboy and Geehad's Floyd	2/26/21	2/26/21
Bushboy and Geehad's Buster Brown	5/16/22	5/16/22
Bushboy and Geehad's Gear	5/16/22	5/16/22

35. In some of the pedigree screen captures, the sender was listed as MOOREFIELD's contact known as "Lonzo Most Recent." I know "Lonzo" to be a nickname Reed uses and that Reed used a Telegram account with the handle @bushboy43.

36. In short, these pedigrees show that "Geehad" has been involved in dogfighting since at least 2002, and, as of May 2022, was still associated with Bushboy. According to those pedigrees posted online, Geehad and Bushboy have had since 2021 at least three dogs that have, between them, won at least four fights.

37. Among the photographs stored in MOOREFIELD's iCloud account was computer artwork that displayed "Geehad Kennels" prominently along with a fierce-looking bust of a cartoon pit bull-type dog.

38. I also found in MOOREFIELD's iCloud account a photograph that featured a printout of an internet-based calendar for the month of May 2009 until early June 2009. Each day of the calendar contained a training regimen in handwritten notes. The final day, June 6, 2009, contained a note that read "Show Time." I believe this training regimen was what MOOREFIELD was

following to train one of his dogs for a dogfight, and that the fight was to be fought on June 6, 2009. Clearly visible in the photograph at the bottom, left of the calendar was “Moorefield, Fred D. CIV AFFMA/XP.” Furthermore, I believe MOOREFIELD was sending this photograph to one of his dogfighting associates for use in their own dog training.

39. Among the records from MOOREFIELD’s iCloud account that I received from Apple, I found multiple text messages, photographs, videos, and other media that contained evidence of dogfighting, and that MOOREFIELD was conducting at least some of this activity at the Dividing Creek Premises and with his vehicle.

40. The iCloud records contained a text message that MOOREFIELD sent in 2016, stating, “Frederick D. Moorefield; [REDACTED] Arnold, MD 21012.” That address is the Dividing Creek Premises.

41. As noted above, convicted DMV Board member Williams included the word “dog” for those of his contacts that he identified as fellow dogfighters. MOOREFIELD’s iCloud account reflects that MOOREFIELD similarly identified most of his dogfighting associates in his contacts list with “dogman” in the name. MOOREFIELD maintained DMV Board members and associates listed in his contacts, including Williams, West, Alston, Allen, Jackson, and Powe.³

42. In MOOREFIELD’s iCloud account, I found multiple photographs taken in or around March 2023 of what appear to be fighting dogs in cages and/or wearing weighted collars consistent with those used to train fighting dogs. The iCloud records contained metadata for the photographs, that included Global Positioning System (GPS) coordinates that resolved to the Dividing Creek Premises. I also found two photographs in which MOOREFIELD was posing with two dogs, and

³ Convicted dogfighter Manny Powe who, as noted above, was a subject of an intercepted call between MOOREFIELD and DF1 in January 2019.

the GPS coordinates for these photographs resolved to the Dividing Creek Premises as well. The first photograph was from April 2020, and was taken inside Dividing Creek Premises; it featured MOOREFIELD with a dog that I believe was a fighting dog after I observed scarring and wound patterns on its face and legs consistent with dogfighting. The second photograph was from March 2021 and appeared to be taken outside in the yard of Dividing Creek Premises; it featured MOOREFIELD with a large, brown pit bull-type dog. Accordingly, I believe MOOREFIELD took these photographs at the Dividing Creek Premises and sent them to his dogfighting associates.

43. The iCloud records included short videos taken in or around March 2023 that featured what appeared to be fighting dogs on treadmills that were filmed at the Dividing Creek Premises. One video was filmed in the unfinished portion of the lower level of the Dividing Creek Premises, and another video was filmed in the living room of the upstairs portion of the Dividing Creek Premises. In one video an unidentified individual cannot be seen but can be heard saying to the dog(s), “Good boy, Freeze. My Man. Good boy.” In the other video an unidentified individual cannot be seen but can be heard saying “(UI) man. That’s what I’m talking about, college boy. Show ‘em what you do, baby. Good boy. Goin’ put you on something, motherfucker.” Based on other audio recordings I have heard of MOOREFIELD, I believe the unidentified person in both videos is MOOREFIELD, and that MOOREFIELD was making the videos to send to his dogfighting associates.

44. I also found a photograph from March 2023 which showed approximately 15 different large bags of dog food in the back of a dark-colored vehicle. This photograph also contained GPS coordinates that resolved to an area approximately five miles from the Dividing Creek Premises. I believe MOOREFIELD had just purchased the dog food and was using his vehicle to transport the dog food back to the Dividing Creek Premises or to his other dogfighting associates. I believe

that MOOREFIELD has long used his vehicle to transport fighting dogs and dogfighting paraphernalia to and from the Dividing Creek Premises, as well as to and from fight locations.⁴

45. iCloud records reflect that, in April 2023, MOOREFIELD participated in a private text message conversation with Janet Berry, a female friend of MOOREFIELD. On April 9, 2023, MOOREFIELD sent Berry a series of messages that stated, “I’m up rockin and rollin doing the JB thang....Straitened up house....Cleaning deck....Washing dishes....Doing dogs.” A few days later on April 12, 2023, MOOREFIELD sent Berry a series of similar messages that stated, “Cool....Just ironed clothes....Dinner in air fryer....About to feed and work dogs.”

46. iCloud records reflect that, between May 2021 and April 2023, MOOREFIELD participated in a private WhatsApp conversation with another of MOOREFIELD’s dogfighting associates (referenced herein as “CW3”). On April 3, 2022, MOOREFIELD sent CW3 a short video clip of two dogs on two separate treadmills that was filmed in the unfinished portion of the lower level of the Dividing Creek Premises. The video was accompanied by the messages “The one on the Emill is hooked into the Philly boys called 425 kennels” and “The one on the slat is your bitch.” Based on my experience in this investigation, I know that MOOREFIELD claimed that his own dog on the electronic treadmill was scheduled to fight, in approximately eight to ten weeks, with a dog owned by Bashawn Allen, a DMV Board member from Trenton, New Jersey, who used the kennel name “425 Kennels.”

47. On April 8, 2023, MOOREFIELD told CW3 that he was “locked back in” with a dogfighter he did not name, for “36.5, \$500 forfeit, \$1500 bet, 6 weeks, May 20.” MOOREFIELD also wrote, “I’ll work him” in the same conversation. Based on my training and experience, I

⁴ As noted above, MOOREFIELD likely transported dead fighting dogs as well as live ones.

know this conversation to mean that MOOREFIELD planned to fight one of his 36.5-pound male dogs on May 20, 2023, for a bet of \$1,500.

48. Using MOOREFIELD's contact information, I discovered a Telegram account that belonged to MOOREFIELD, although he did not maintain any profile pictures. I further learned that, at the time of this writing, MOOREFIELD last accessed his Telegram account on or around September 6, 2023. After reviewing Telegram message records, I understand that MOOREFIELD accessed the Telegram app to communicate with his dogfighting associates because I located multiple Telegram accounts for his dogfighting associates with the contact numbers MOOREFIELD maintained for each of them. All of the accounts I observed had activity during the same timeframe that MOOREFIELD was last using Telegram.

49. MOOREFIELD also encouraged others to communicate on Telegram. iCloud records reflect that, in a text message to an undisclosed associate in March 2023, MOOREFIELD stated, "Use Telegram not WhatsApp because telegram is encrypted." During another private WhatsApp conversation with dogfighter "Rio" in November 2022, MOOREFIELD said, "Sent you that stuff on Telegram."

III. FLYTHE is a Dogfighter Known as "Razor Sharp Kennels."

50. On April 27, 2023, one of my FBI colleagues presented the DMV photo of MOOREFIELD to a convicted dogfighter who signed a cooperation agreement in the Western District of Virginia (referenced herein as "CW4"). CW4 identified the person in the photo as "Fred" and "Geehad" and stated "Fred" was last at his residence in 2021 to "roll" some dogs. CW4 also stated that "Fred" was affiliated with "Razor Sharp Kennels." CW4 identified "Razor Sharp Kennels" as "Mario Dogs" in his contacts list, with phone number [REDACTED]-0644, and an address of the Magnolia Premises.

51. Verizon toll records for MOOREFIELD's phone corroborate this cooperator's statement. Between April 2022 and April 2023, MOOREFIELD and FLYTHE spoke by telephone approximately 734 times (not including text messages).

52. In a search of MOOREFIELD's iCloud account, I found an exchange of messages in June 2022, through WhatsApp, with someone who appears to be a relative of MOOREFIELD. In that message, MOOREFIELD stated, "Fat Mario got a 35 f going out next month into Philly niggas" and further described Fat Mario as "my fat barber." I know FLYTHE is a barber and that, according to DMV records, [REDACTED]. Based on my experience in this investigation, I understand MOOREFIELD's message to convey that FLYTHE had a dogfight for a 35-pound female dog planned for July 2022.

53. I looked at the Pedigrees Online website and found an entry posted on January 14, 2020, and last modified on August 17, 2020, for the fighting dog "Zachariah II," claimed to be owned by "Razor Sharp Kennels."

54. Anne Arundel County Animal Control provided calls for service at the Magnolia Premises, and it has been responding to FLYTHE's residence at the Magnolia Premises since approximately 2008 for animal cruelty and dogfighting allegations. Anne Arundel County Animal Control retained the phone number [REDACTED]-0644 for FLYTHE.

55. In April 2022, when Anne Arundel County Animal Control last visited the Magnolia Premises, they observed five pit bull-type dogs, including one named Zachariah:

- a. Freight Train: A 2-year-old unaltered male pit bull mix-type breed of dog.
- b. Bandit: A 1-year-old brindle with white unaltered male pit bull mix-type breed of dog.
- c. Zachariah: A 2-year-old chocolate unaltered male pit bull mix-type breed of dog.

- d. Ace: A 2-year-old black and white unaltered male pit bull mix-type breed of dog.
- e. Achilles: A 2-year-old tan unaltered male pit bull mix-type breed of dog.

56. As of August 2023, Anne Arundel County Animal Control provided me a report that FLYTHE maintained Zachariah, Ace, and Achilles in an “active” status at the Magnolia Premises, and that FLYTHE last licensed the three dogs in April 2023 for a period of one year.

57. The iCloud records from MOOREFIELD’s account also showed conversations between MOOREFIELD and MOOREFIELD’s contact at [REDACTED]-0644, which MOOREFIELD identified as “Mario New Number Flythe.” In a text message exchange that took place in approximately March 2023, MOOREFIELD sent FLYTHE two pictures of a dog with a weighted collar on a leash along with the text, “Goes out Friday” and a day later wrote, “Won in 1:18 dead dog.” FLYTHE replied, “Awesome. We’re up next my G.” Based on my experience in this investigation, I understand MOOREFIELD’s messages to convey that MOOREFIELD’s dog won a fight that lasted one hour and 18 minutes (and killed the losing dog). Based on my experience in this investigation, I understand FLYTHE’s message to convey that the next fight on the schedule was a fight involving a dog jointly owned by MOOREFIELD and FLYTHE.

58. In another exchange from MOOREFIELD’s iCloud records, MOOREFIELD wrote to FLYTHE on or around April 8, 2023, “It’s back on. 36.5, \$500 forfeit, \$1500 bet, 6 weeks, May 20.” MOOREFIELD’s Maryland EZ Pass toll records from the evening of May 20, 2023 show a photo of MOOREFIELD’s vehicle with a person that appears to match FLYTHE’s build in the front passenger seat. When I spoke with MOOREFIELD on September 6, 2023, he confirmed that he was driving the car in that photo. Based on the message exchange and EZ Pass records, I believe that MOOREFIELD and FLYTHE sponsored a dog in a fight on May 20, 2023 and wagered \$1,500 on the outcome.

59. In their exchanges, MOOREFIELD and FLYTHE discussed the fighting weight of one of the dogs that they jointly owned. FLYTHE suggested that they seek an opponent for her at 39.5 pounds, but MOOREFIELD objected because their dog was too small at that weight; he suggested that they seek a fight for her at 40.8 pounds.

60. I found in the search of MOOREFIELD's iCloud account a photograph from March 2023 which showed approximately 15 different large bags of dog food in the back of a dark-colored vehicle. I believe MOOREFIELD had just purchased the dog food and was about to transport the dog food back to his own residence and/or to the residence of one of his dogfighting associates. I suspect that MOOREFIELD purchased dog food to support his partnership with FLYTHE in part because I found in MOOREFIELD's iCloud account a text message in which MOOREFIELD directed FLYTHE to "Send me the link to that food" approximately 10 days after MOOREFIELD took the picture of the dog food. I believe MOOREFIELD and FLYTHE experiment with different types of dog food in order to increase the performance of their fighting dogs, which ultimately increases their likelihood of winning a dogfight.

61. In April 2023, MOOREFIELD asked FLYTHE, "How did them blue gummies work," to which FLYTHE responded, "Cool but Vs are more bang I think." I believe that FLYTHE had fighting dogs at the Magnolia Premises, and that he was experimenting with different types of performance enhancing drugs to improve his and MOOREFIELD's chances of winning dogfights.

62. Records I obtained from CashApp reflect that, in September and October 2021, FLYTHE sent MOOREFIELD a total of \$850 in two separate transactions accompanied by the notes "Dog cages. 10-21-21" and "Dog houses 9-6-21."

63. I conducted surveillance at the Magnolia Premises in May and August 2023. The Magnolia Premises is located [REDACTED]

[REDACTED]. During the August 2023 surveillance, I observed two vehicles registered to FLYTHE at the Magnolia Premises and an individual matching FLYTHE's description exiting the driver side of one of the vehicles prior to entering the Magnolia Premises.

64. The Magnolia Premises is located on approximately 0.20 acres of land, and the front yard is surrounded by a chain-linked fence. Access to the backyard is protected by a wooden privacy fence with "private property" and "beware of dog" signs.

III. Searches of MOOREFIELD's and FLYTHE's Properties Showed Evidence of Dogfighting.

65. On September 1, 2023, Magistrate Judge A. David Copperthite issued warrants for the searches of MOOREFIELD's person, FLYTHE's person, MOOREFIELD's vehicle, the Dividing Creek Premises, and the Magnolia Premises.

66. On September 6, 2023, I, with a joint group of FBI agents, United States Department of Agriculture – Office of the Inspector General agents, Defense Criminal Investigative Service agents, U.S. Marshals, personnel from contractor [REDACTED], and local law enforcement officers, conducted a search at the Dividing Creek Premises beginning at approximately 6:50 a.m. A separate group of FBI agents, United States Department of Agriculture – Office of the Inspector General agents, U.S. Marshals, and personnel from contractor [REDACTED], conducted a search at the Magnolia Premises beginning at approximately 6:50 a.m. During the course of those searches, five pit bull-type dogs were found in a windowless room in the unfinished portion of the basement of the Dividing Creek Premises, and seven pit bull-type dogs were found in the back yard and basement of the Magnolia Premises.

67. The following dogs were seized from the Dividing Creek Premises (see Attachment A-2):

- a. a black, female pit bull-type dog (USM-1372);

- b. a black, female pit bull-type dog (USM-1373);
- c. a black, female pit bull-type dog (USM-1374);
- d. a tan, female pit bull-type dog (USM-1375); and
- e. a tan, male pit bull-type dog (USM-1376).

68. The following dogs were seized from the Magnolia Premises (see Attachment A-3):

- a. a black, male pit bull-type dog (USM-1377);
- b. a black, female pit bull-type dog (USM-1378);
- c. a black and white, male pit bull-type dog (USM-1379);
- d. a red, male pit bull-type dog (USM-1380);
- e. a tan and white, male pit bull-type dog (USM-1381);
- f. a black, female pit bull-type dog (USM-1382); and
- g. a red, female pit bull-type dog (USM-1383).

69. During the course of the search of the Dividing Creek Premises, agents observed evidence consistent with MOOREFIELD using the Dividing Creek Premises to breed and train dogs, including the five seized dogs, for fighting. In particular, agents observed thick-barred metal cages, some of which held the seized dogs when the search team arrived at the premises. The room holding the seized dogs contained items generally used to train dogs for fighting, including weighted collars and heavy metal chains that I understand from my training and experience are usually used to increase fighting dogs' strength during training. Agents observed an apparatus that is used for involuntarily inseminating female dogs. In the main room of the basement, agents observed dark reddish-brown stains on the walls that I believe are consistent with bloodstains from dogfights held at the location. See Attachment A-1. Agents also observed and photographed wood panels with dark stains and hair on them, which appears consistent with the panels being used for

dogfights. See id. At the time agents observed the dark stains and hair on the walls, furniture, and wood panels, collection of samples and seizure of the items was not practicable.

70. During the course of the search of the Dividing Creek Premises, agents also seized the following items commonly associated with illegal dogfighting:

- a. veterinary medicine (including Winstrol, an anabolic steroid) and veterinary tools (including syringes and a medical staple gun);
- b. a rolled-up grey carpet with dark stains, which appears consistent with blood stains derived from multiple dogfights (see Attachment A-4);
- c. a weighted vest bearing the name “Geehad Kennels” (see Attachment A-5);
- d. a “keep” training schedule⁵;
- e. MOOREFIELD’s iPhone, which contained Telegram messages consistent with his involvement in dogfighting; and
- f. a device consisting of jumper cables attached to an electrical plug (see Attachment A-6), which, based on my training and experience, is used to electrocute a dog after losing a fight.

71. I spoke with MOOREFIELD during the course of the search of the Dividing Creek Premises, after advising him that he was not under arrest and was speaking with agents voluntarily. During that discussion, MOOREFIELD admitted that he uses the alias “Geehad Kennels” to identify himself. MOOREFIELD told me that FLYTHE had been at the Dividing Creek Premises to care for MOOREFIELD’s dogs during the prior weekend while MOOREFIELD was in Pittsburgh. He further stated that authorities from animal control and Anne Arundel law

⁵ I understand from my training and experience that “keep” is a term dogfighters use to refer to a training period for dogs leading up to a fight, usually lasting approximately eight weeks.

enforcement had previously visited the Dividing Creek Premises and observed dogs at the location. Following this conversation, I confirmed that MOOREFIELD did have interactions with law enforcement and animal control authorities pertaining to animal-related events. No charges were filed against MOOREFIELD at those times.

72. After seizing MOOREFIELD's iPhone, I was able to review messages sent and received from the Telegram app on that phone. Exchanges between MOOREFIELD and others showed evidence of MOOREFIELD both betting on and "hooking" dogfights. In one exchange on a group chat named "42F," MOOREFIELD exchanged messages with users identified as "HardWay" and "E Z" in the message thread. See Attachment A-7. On or around May 28, 2022, MOOREFIELD wrote, "42f, \$4k, 6-8 weeks, \$1k fit." HardWay responded, "I'll do 8 weeks I'll be back on Tuesday." MOOREFIELD clarified the timing and wrote, "You got a spot in NJ," to which HardWay responded, "Yea we have a spot." MOOREFIELD then wrote, "It's a hook." Based on my training and experience, I understand this exchange to be an agreement between MOOREFIELD and HardWay to sponsor dogs in a fight in New Jersey occurring roughly eight weeks from the time of the messages. I understand that each dogfighter agreed to wager \$4,000 on their dog winning, and the forfeit ("fit") payment for backing out of the fight would be \$1,000.

73. In a different Telegram exchange with a contact identified as "BIG GOON"⁶ in or around September 2023, MOOREFIELD wrote that he would "go in on the bet" for a dogfight he would not be attending. See Attachment A-8. The bet was arranged, and on or around September 3, 2023, BIG GOON wrote, "Yo that mutt quit 50mins," to which MOOREFIELD responded, "Fuck these dogs." BIG GOON then shared a video that appears to show a dog "quitting" a fight

⁶ As noted above, I understand "Big Goon" to be an alias for Larry Alston.

by refusing to run out and meet its opponent in the center of the “box” where the fight took place. MOOREFIELD then wrote, “I ain’t betting on nobodies dogs but mine lol.” Based on the context of this conversation, I understand that MOOREFIELD was suggesting he would only bet on his own dogs in future fights, as he believed his dogs were better trained.

74. During the course of the search of the Magnolia Premises, agents observed evidence consistent with FLYTHE using the Magnolia Premises to breed and train dogs, including the seven dogs seized from the Magnolia Premises, for fighting. Agents observed fenced-in metal cages in the back yard, and a privacy fence erected between the house and the back yard that obscured those cages from view. Agents observed dogfighting paraphernalia, including weighted collars, a treadmill, a carpet mill (a treadmill using carpeted flooring instead of a traditional belt), and other items that I understand are often used to increase fighting dogs’ strength during training.

75. During the course of the search of the Magnolia Premises, agents also seized the following items commonly associated with illegal dogfighting:

- a. paperwork regarding dog lineage;
- b. dog pedigrees; and
- c. a “Canine Athletes” business card.

76. One of my FBI colleagues also spoke with FLYTHE during the course of the search of the Magnolia Premises, after advising FLYTHE that he was not under arrest or being detained and was speaking with agents voluntarily. During that discussion, FLYTHE admitted that he uses the alias “Razor Sharp Kennels” to identify himself. FLYTHE further said he had been friends with MOOREFIELD for over ten years, and that one of the dogs seized from the Magnolia Premises was a puppy MOOREFIELD had bred and given to FLYTHE. FLYTHE admitted to

having engaged in dogfighting in the past. He also stated that he used the equipment agents observed on the premises to exercise his dogs.

CONCLUSION


Based on the foregoing facts and my training and experience, I respectfully submit that there is probable cause to believe that Frederick Douglass MOOREFIELD, Jr. and Mario Damon FLYTHE violated Title 7, United States Code, Section 2156(b) and Title 18, United States Code, Section 49(a), Buying, Selling, Delivering, Possessing, Training, or Transporting Animals for Participation in an Animal Fighting Venture; Title 7, United States Code, Section 2156(c) and Title 18, United States Code, Section 49(a), Use of Postal Service or Other Interstate Instrumentality for Promoting or Furthering an Animal Fighting Venture; Title 18, United States Code, Section 371, Conspiracy to Sponsor or Exhibit an Animal in an Animal Fighting Venture; and Title 18, United States Code, Section 1952, Interstate and Foreign Travel or Transportation in Aid of Racketeering Enterprises.

Based on the foregoing information, I have probable cause to believe that the stained walls, furniture, and wood panels observed at the Dividing Creek Premises constitute evidence of the TARGET OFFENSES and that those items are currently located at the Dividing Creek Premises. I therefore respectfully request that a search warrant be issued authorizing a search of the Dividing Creek Premises for the purpose of taking samples from those items in order to test those samples for the presence of canine DNA (as described in Attachment B).



Ryan C. Daly
Special Agent
Federal Bureau of Investigation

Affidavit submitted by email and attested to me as true and accurate by telephone consistent with Fed. R. Crim. P. 4.1 and 41(d)(3) this 21 th day of September, 2023.



The Honorable Brendan A. Hurson
United States Magistrate Judge

ATTACHMENT A-1

██████████ Arnold, MD 21012 is a single-family, split-level residence located in Anne Arundel County, in Arnold ██████████. The residence has a panel exterior and a white front door behind a storm door with a deck/patio area to the immediate right of the front door; the structure is located on approximately 0.25 acres of land with without a fence. The mailbox is located at the very end of the pipe stem with the numbers ██████████. There is a shed located in the southeast portion of property in the back yard. The exterior pictures were taken during surveillance conducted on or around May 10, 2023.

During a search executed at the premises on September 6, 2023, agents observed dark stains on the walls of the finished portion of the basement, which appeared consistent with dog blood. Agents further observed large wooden panels with similar dark stains and what appeared to be dog hair. The pictures of the basement interior and wooden panels were taken during the September 6, 2023 search.





ATTACHMENT A-2

During a search executed at [REDACTED] Arnold, MD 21012 on September 6, 2023, agents seized five pit bull-type dogs of varying age, sex, and color. The pictures below were taken during the September 6, 2023 search. These pictures show the five dogs in the conditions in which they were discovered during the course of the search.



ATTACHMENT A-3

During a search executed at the Magnolia Premises on September 6, 2023, agents seized seven pit bull-type dogs of varying age, sex, and color. The pictures below were taken during the September 6, 2023 search. These pictures show the seven dogs in the conditions in which they were discovered during the course of the search.





ATTACHMENT A-4

During a search executed at [REDACTED] Arnold, MD 21012 on September 6, 2023, agents seized a section of grey carpet with several dark stains on it. The stains were consistent with bloodstains from multiple dogfights. The picture below was taken during the September 6, 2023 search. The picture reflects the condition of the carpet after it was retrieved from the shed on the premises and unfolded.



ATTACHMENT A-5

During a search executed at [REDACTED] Arnold, MD 21012 on September 6, 2023, agents seized a weighted vest of a size that would fit a dog's body. The patch on the vest reads "Geehad Kennels." The picture below was taken during the September 6, 2023 search.



ATTACHMENT A-6

During a search executed at [REDACTED] Arnold, MD 21012 on September 6, 2023, agents seized a device consisting of jumper cables attached to an electrical plug. Substances that appear consistent with dog hair and blood were found on the ends of the jumper cables. The picture below was taken during the September 6, 2023 search.



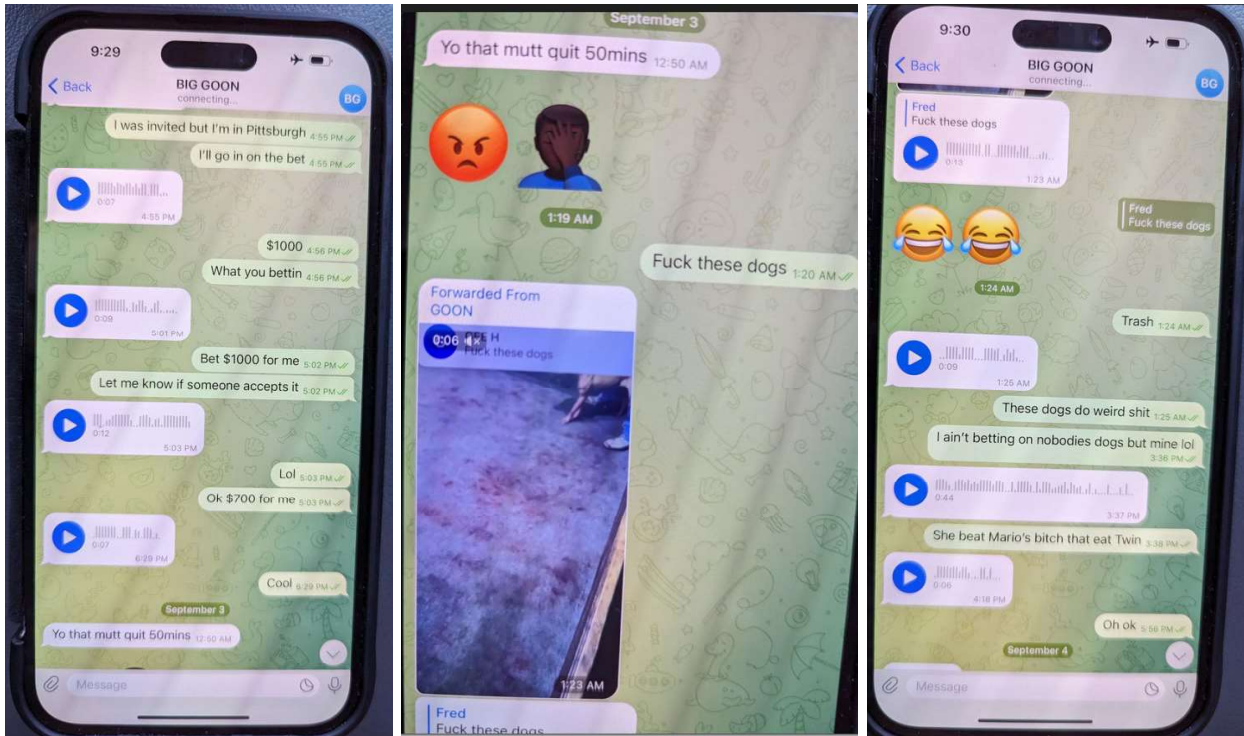
ATTACHMENT A-7

During a search executed at [REDACTED] Arnold, MD 21012 on September 6, 2023, agents seized an iPhone from a dresser in Frederick Douglass Moorefield Jr.'s bedroom. The Telegram messaging application was installed on the phone and contained, among other conversations, a May 2022 exchange in a group chat labeled "42F" between Moorefield and users identified in the chat as "HardWay" and "E Z." The messages from HardWay and E Z appear on the left side of the exchange in white speech bubbles, and the messages from Moorefield appear on the right in light green speech bubbles.



ATTACHMENT A-8

During a search executed at [REDACTED] Arnold, MD 21012 on September 6, 2023, agents seized an iPhone from a dresser in Frederick Douglass Moorefield Jr.'s bedroom. The Telegram messaging application was installed on the phone and contained, among other conversations, a September 2023 exchange between Moorefield and a contact named "BIG GOON." The pictures of the iPhone below show the conversation as it appears on that device and were taken on or around September 15, 2023. The messages from BIG GOON appear on the left side of the exchange in white speech bubbles, and the messages from Moorefield appear on the right in light green speech bubbles.



ATTACHMENT B

ITEMS TO BE SEIZED

I. ITEMS TO BE SEIZED

1. Records or information related to the fruits, instrumentalities, and evidence of violations of 7 U.S.C. § 2156 (unlawful animal fighting venture), from January 2015 to the present, including:

- A. Samples taken of dark stains on the walls of the basement of the premises located at [REDACTED] Arnold, Maryland 21012; and
- B. Samples taken of dark stains and hair on wooden panels found on the premises located at [REDACTED] Arnold, Maryland 21012.

II. GOVERNMENT PROCEDURES FOR WARRANT EXECUTION

1. On behalf of the government, qualified personnel will retrieve samples of the material identified above to be tested for the presence of canine blood, hair, and/or other bodily fluids.