

RETURN DATE: November 16, 2021

STATE OF CONNECTICUT <i>EX REL</i> ,	:	SUPERIOR COURT
JEREMIAH DUNN,	:	
CHIEF STATE ANIMAL CONTROL OFFICER	:	JUDICIAL DISTRICT
<i>Petitioner,</i>	:	OF HARTFORD
	:	
v.	:	AT HARTFORD
	:	
SEVEN PIT BULL DOGS	:	
AND NATHANIAL SEBASTIAN MARTINEZ,	:	
<i>Defendants and Noticed Owner.</i>	:	OCTOBER 20, 2021

VERIFIED PETITION

INTRODUCTION

1. Pursuant to Conn. Gen. Stat. § 22-329a (b), the Chief State Animal Control Officer of the Plaintiff, the State of Connecticut (hereinafter “Plaintiff” or “State”), may file a petition with the Superior Court, Judicial District of Hartford, upon issuance of a warrant by a Superior Court of the State of Connecticut finding probable cause that one or more animals are or have been neglected or cruelly treated for reasons that include but are not limited to the ownership, possession, keeping, and/or training of an animal for the purpose of engaging the exhibition of fighting for the purpose of entertainment or gain in violation of Conn. Gen. Stat. § 53-247.
2. On or about October 5, 2021, the Connecticut State Police (hereinafter “the State Police”) obtained a search and seizure warrant, as part of an investigation, for 968 Grassy Hill Road, Orange, CT (the “property”). (Affidavit of Detective Michael Grabowski, ¶ 10, Exhibit 1 [hereinafter “Grabowski Aff’t”]).
3. On or about October 5, 2021, said search and seizure warrant was executed and seven (7) live pit bull breed dogs were seized by the Chief State Animal Control Officer at the

property as part of an ongoing investigation into an alleged dog-fighting operation. (Grabowski Aff't, ¶ 13; Affidavit of Jeremiah Dunn, ¶¶ 10, 12 [hereinafter "Dunn Aff't"]).

4. The Plaintiff now commences this *in rem* action and seeks to obtain permanent ownership of said seven pit bull dogs, pursuant to the procedures outlined in Conn. Gen. Stat. §§ 22-329a (b) and (c).

THE PARTIES

5. The Plaintiff is the State of Connecticut *ex rel*, Jeremiah Dunn, Chief State Animal Control Officer, and as such, pursuant to Conn. Gen. Stat. § 22-328, is charged and authorized with the supervision and enforcement of the statutes and regulations of the State of Connecticut respecting the treatment of animals, including Chapter 435 of the General Statutes governing the treatment of dogs and other animals. The State and the Chief State Animal Control Officer are further authorized pursuant to Conn. Gen. Stat. § 22-329 to interfere and act to prevent the cruel treatment of any dog or other animal. (Dunn Aff't, ¶ 4).
6. Pursuant to Conn. Gen. Stat. § 22-329a, alleged owners of the animals subject to a Verified Petition are to be alleged as owners within the petition and named as defendants for purpose of notice only.
7. Upon information and belief, Defendant, **Nathanial Sebastian Martinez**, with a residential address of 968 Grassy Hill Road, Orange, CT, is the putative owner of some or all of the seven pit bull dogs that are the subject of this petition.

8. The Defendant, Nathaniel Sebastian Martinez, is the owner of the property at 968 Grassy Hill Road, Orange, CT, at which all of the seven pit bull dogs that are the subject of this petition were kept. (Grabowski Aff't, ¶¶ 11-13)
9. Upon inquiry by State Animal Control Officers, the Defendant, Nathaniel Sebastian Martinez, claimed he owned all seven dogs. No licenses for the dogs were recovered during the search of the property at 968 Grassy Hill Road, Orange, CT. (Dunn Aff't, ¶ 20)
10. Mr. Martinez identified the seven dogs as the following:
 - a. A black-and-white female pit bull breed dog named "Vera;"
 - b. A dark brindle female pit bull breed dog named "Angie;"
 - c. A tan brindle female pit bull breed dog named "Zebra;"
 - d. A black and white-chested male pit bull breed dog named "Sypher;"
 - e. A black and white-faced male pit bull breed dog named "Mugshot;"
 - f. A tan-and-white male pit bull breed dog named "Horris;" and
 - g. A brown and white-mustached female pit bull breed dog named "Lucy." (Dunn Aff't, ¶ 20, Exhibits 2-A through 2-G)

COUNT ONE: PETITION PURSUANT CONN. GEN. STAT. § 22-329a AS TO CUSTODY OF EIGHT PIT BULL DOGS OWNED BY THE DEFENDANTS

- 1-10. The State of Connecticut hereby incorporates paragraphs 1-10 of this Complaint.
11. Starting June 30, 2021, the Connecticut State Police Statewide Organized Crime Investigative Task Force (SOCITF) has and continues to assist the Suffolk County, New York Police Department (SCPD) on an ongoing criminal investigation into a multi-state dog fighting ring. (Grabowski Aff't, ¶ 4)

12. On or about July 31, 2021, as part of the ongoing coordinated investigation with SCPD, the State Police executed a warrant for search and seizure of a property located at 109 Britannia Street, Meriden CT, at which eight pit bull breed dogs were located and seized, along with significant evidence that said dogs were being owned, kept, possessed and/or trained for the purpose of fighting for the purpose of entertainment or gain. Said dogs are subject to a separate action in the Superior Court. *See State of Connecticut ex rel Jeremiah Dunn, Chief State Animal Control Officer v. Eight Pit Bull Dogs et al*, HHD-CV21-6146562-S. (Grabowski Aff't, ¶ 5; Dunn Aff't, ¶¶ 6-7)
13. As part its ongoing investigation, the State Police received from SCPD several videos recovered from a phone of an arrested target of the investigation. All three videos were part of an ongoing text-messaging conversation between the target and the Defendant, Nathaniel Sebastian Martinez. Such videos include the following:
 - a. A thirty-five (35) second video depicting six dogs held in six separated chain-link kennels in front of a wooden panel fence. Several dogs were chained inside of the kennels. Later investigation confirmed the location in this video to be 968 Grassy Hill Road, Orange CT;
 - b. A fifteen-second (15) video of two roosters engaged in an organized fight. One of the roosters appears to be severely injured or killed by the other during the course of the video; and
 - c. A forty-one (41) second video depicting an organized fight between two roosters inside a circular ring. Several individuals can be seen observing the fight between the two animals. One of the roosters appears to be severely injured or killed by the other during the course of the video. (Grabowski Aff't, ¶ 8)

14. On September 21, 2021, Detective Michael Grabowski, a sworn member of the Connecticut State Police and SOCITF, conducted surveillance in the area of the property. Detective Grabowski was able to verify that the location of one of the videos presented to the State Police by SCPD was 968 Grassy Hill Road. During the course of his surveillance, Detective Grabowski was able to verify by sight and sound at least two dogs located on the property. (Grabowski Aff't, ¶ 9)
15. On or about September 30, 2021, the Superior Court of Connecticut issued a warrant finding that there was probable cause that dogs located on the property were being owned, kept, possessed and/or trained for the purpose of fighting for entertainment or gain at the property and authorized the Connecticut State Police to conduct a search of said location and seize any and all evidence of dog fighting and/or the keeping of dogs for the purpose of dog fighting, including but not limited to all: cellular phones; mass data storage devices; computers; laptops; bulk cash; ledgers and/or other records of gambling activity; veterinary medications; scales or other weighing devices; any items used to break a dog's jaw from a bite; and any other evidence related to dog fighting and/or the keeping of dogs for the purpose of fighting. (Grabowski Aff't, ¶ 10, Exhibit 1)
16. The warrant also authorized that the Chief State Animal Control Officer take physical custody of any and all dogs being owned, kept, possessed and/or trained for the purpose of an exhibition of fighting for entertainment or gain at the property, pursuant to Conn. Gen. Stat. § 22-329a (b). (Grabowski Aff't, ¶ 10; Dunn Aff't ¶ 9)
17. On or about October 5, 2021, Detective Grabowski, along with officers from the Connecticut State Police, conducted a search of the property. Also present were officers of the SCPD, an officer of the Orange County Police Department, the Chief State Animal

Control Officer, State Animal Control Officers from the Connecticut Department of Agriculture, and Animal Control Officers from the Milford Animal Control Unit.

(Grabowski Aff't, ¶ 13; Dunn Aff't, ¶ 10)

18. The property is a single-family residence located on three-quarters of an acre. There is a residence, a two-car detached garage, a detached shed, and a fenced-in area in the rear southwest corner of the property. (Grabowski Aff't, ¶ 12; Dunn Aff't, ¶ 11)
19. During the course of the search of the property, the State Police discovered seven dogs housed in chain link cages in the back yard of the property. Each dog appeared to be a pit-bull breed, of varying genders and colors. The dogs did not possess identifying tags or collars. Pursuant to the warrant, the Chief State Animal Control Officer and Connecticut Department of Agriculture took control of the dogs, and following veterinary examination currently is holding them at the Milford Animal Control facility with the assistance of the Milford Animal Control Unit. (Grabowski Aff't, ¶ 13-15, Exhibits 5-A through 5-G; Dunn Aff't ¶¶ 12, 25, 27, Exhibits 2-A through 2-G)
20. The dogs were located in the fenced-in area in the southwest corner of the property. The fenced in area is extremely weeded and overgrown, and portions of the fence were broken and leaning on the dog's cages. (Grabowski Aff't, ¶ 14, Exhibits 2, 3, 4; Dunn Aff't, ¶¶ 12, 13)
21. Each dog was housed in an individual cage, all made of chain-link metal. All of the cages were exposed to the elements and lacked roofing. The cages were driven into the ground and lacked flooring. The ground around the cages were extremely muddy, wet, and unclean, containing significant amounts of solid dog waste in the cages that the dogs would be forced to walk through. There was a strong, foul odor throughout the entire

area. Several of the dogs were observed to be visibly shaking when discovered in the cages. (Grabowski Aff't, ¶¶ 15, 16, Exhibits 5-A through 5-G, 6-A through 6-C; Dunn Aff't, ¶¶ 14, 15, Exhibits 1-A through 1-G)

22. Inside each cage was a makeshift doghouse of extremely small size. Some of the houses were made of wood, others of cinder blocks and cut piping, or makeshift plastic. None of the houses were of adequate size for the dogs to allow them comfortable movement. The doghouses were the only portions of the cages protected from the elements. (Grabowski Aff't, ¶ 15, Exhibits 5-A through 5-G; Dunn Aff't, ¶ 14, 15, Exhibits 1-A through 1-G)
23. All of the dogs were discovered tethered inside their cages using thick chains. These chains were short and made of large metal links. Pursuant to Conn. Gen. Stat. § 22-350a (a), it is illegal to tether a dog to a stationary object with a tether that allows for less than eight feet of movement in any one direction. Additionally, it is illegal under that section to tether an animal without swivels inside the tether to prevent twisting and tangling. Finally, it is illegal under that section to tether an animal with tethers made of chains more than one-quarter inch thick. The tethers in which the seven pit bull breed dogs were discovered were in violation of all three of these requirements. (Grabowski Aff't, ¶ 16; Dunn Aff't, ¶¶ 17, 18)
24. Following seizure of the dogs, they were given a veterinary examination at the Animal Clinic of Milford. The dogs presented as between two and eight years of age. The dogs presented with the following medical concerns:
 - a. The dog identified as "Vera" presented with an ear infection, unclean, and with overgrown nails requiring trimming;

- b.* The dog identified as “Angie” presented in poor body condition, possibly from malnutrition, with poor hair coat condition and multiple scars and lost hair, along with overgrown nails and teeth. Angie was also noted to have given birth to several litters;
- c.* The dog identified as “Zebra” presented with an ear infection, unclean, and with overgrown nails as well as a broken claw on one of her right feet, which required bandaging and treatment for bleeding;
- d.* The dog identified as “Sypher” presented in poor body condition, possibly from malnutrition, unclean, and had dried solid waste in his fur, as well as an eye infection and overgrown nails;
- e.* The dog known as “Mugshot” presented in poor body condition, possibly due to malnutrition, was unclean and had overgrown nails, as well as scarred on his face and a notch missing from one ear possibly attributable to trauma or injury;
- f.* The dog known as “Horris” presented in poor body condition, was unclean and had overgrown nails, as well as an oral mass and a scar on the face possibly attributable to bite wound trauma; and
- g.* The dog known as “Lucy” presented in poor body condition, with dry, flaking skin and calloused lesions possibly attributable to poor housing, as well as with a heart murmur and eye inflammation with discharge. (Dunn Aff’t, ¶ 25, Exhibits 3, 4, 5, 6, 7, 8, 9)

25. In addition to the seven pit bull dogs, the State Police discovered and photographed and/or seized at the property significant amounts of paraphernalia consistent with a

facility to keep or train dogs for the purpose of dog fighting. These items included, but are not limited to, the following:

- a.* A ledger or scrapbook discovered in the master bedroom of the house on the property, detailing numerous dogs, their lineages, identifying information, and fight statistics, with over eighty dogs contained within the ledger's index; (Grabowski Aff't, ¶ 19, Exhibits 10, 11-A through 11-C, 12)
- b.* A DVD discovered in the basement of the house on the property, depicting organized rooster fighting in Torreón, Coahuila, Mexico; (Grabowski Aff't, ¶ 25, Exhibit 21)
- c.* Assorted journals and periodicals about dog breeding and fighting, including several copies of "The American Gamedog Times," a Game Dog being a term upon information and belief is in reference to the characteristics of fighting dogs or dog fighting itself. The journals included stories such as "A Story about Gamedog Dealin" and "Why I Fight Dogs"; (Grabowski Aff't, ¶¶ 20, 21, Exhibits 13, 14, 36)
- d.* Additional magazines, all focused on pit bull dogs, as well as numerous advertisements for pit bull breed dogs, including some discovered in a leather binder with the term "Back Yard Boys" written upon it; (Grabowski Aff't, ¶¶ 22, 23, Exhibits 15, 16, 17, 18-A through 18-C)
- e.* A handwritten advertisement drafted in a notebook for bred "Patterdale Terriers," which included that the dogs were "Game Bred" and "not for looks but for performance" with "all breeding planned years in advance;" (Grabowski Aff't, ¶ 30, Exhibit 27)

- f.* A number of flat leather collars known to be used for aggression and agitation training, as well as a weighted harness; (Grabowski Aff't, ¶¶ 31, 34, Exhibits 28, 29, 34)
- g.* A treadmill designed for use by dogs; (Grabowski Aff't, ¶ 18, Exhibits 9-A and 9-B)
- h.* Multiple rusted dog carriers discovered in the shed on the property, all of which were unclean and contained significant amounts of solid dog waste; (Grabowski Aff't, ¶ 17, Exhibit 7; Dunn Aff't ¶ 16)
- i.* A portable hanging scale and a portable pet scale, of the type and design known to be used for weighing-in dogs prior to dog fights; (Grabowski Aff't, ¶ 24, Exhibits 19-A and 19-B, 20-A and 20-B)
- j.* A box of veterinary supplies in the basement of the house of the property, which contained a box of tongue depressors, a 30ml vial of Lutalyse, and a container of Strongoid Paste. Lutalyse is a dinoprost injectable, designed to induce labor or assist in breeding, and is recorded on the box as for use in "cattle, swine, and mares." The recovered Strongoid Paste is a compound of pyrantel pamoate used as an anti-worming compound for horses. Lutalyse is a controlled substance only to be utilized by or on the order of a veterinarian; (Grabowski Aff't, ¶ 26, Exhibits 22, 23; Dunn Aff't, ¶ 22)
- k.* A set of veterinary needles and syringes as well as a skin stapler, all discovered on a desk in the basement of the house on the property; (Grabowski Aff't, ¶ 27, Exhibits 24-A and 24-B)
- l.* Additional veterinary supplies discovered in the basement of the house on the property in a metal container, including deworming treatments, one of which was

formulated for cattle and swine, as well as a syringe, measuring cup, and turkey baster; (Grabowski Aff't, ¶ 28, Exhibit 25)

- m.* A toolbox of veterinary supplies discovered in the shed on the property; inside of which were syringes as well as a 100ml vial of injectable Dexamethasone and a 50ml vial of Marcaine. Dexamethasone is an injection used to treat inflammation and is also used as a diuretic to dehydrate a dog and lower its body weight. Marcaine is a trade name for bupivacaine HCL, a local anesthetic and nerve-blocking agent. Both Dexamethasone and Marcaine are controlled substances that are to only be used by or on order of a veterinarian; (Grabowski Aff't, ¶ 32, Exhibits 30, 31-A and 31-B, 32-A and 32-B; Dunn Aff't, ¶ 22)
- n.* A bucket of additional veterinary supplies, located in the shed, including several measuring cups, a container of Blood Stop Powder, a benzalkonium chloride antiseptic formulated for dogs, and several pyrantel pamoate deworming agents. Blood Stop Powder is, upon information and belief, a coagulant used to heal minor injuries and lacerations on dogs; (Grabowski Aff't, ¶ 33, Exhibits 33-A and 33-B; Dunn Aff't, ¶ 22)
- o.* A handwritten list recovered in the basement detailing possible injuries and courses of treatment for dogs along with times to treat them, notably articulating a five-day treatment of “bandages” in the event of “Broken Limbs,” and a one-day treatment of “accessories” in the event of “Ugly[ness];” and (Grabowski Aff't, ¶ 29, Exhibits 26-A and 26-B; Dunn Aff't, ¶ 23)
- p.* A breeding stand recovered in the shed, which is a device designed to restrain female dogs for the purpose of forcing or inducing breeding, and preventing them from

biting or moving away from the breeding male dog. (Grabowski Aff't, ¶ 22, Exhibits 19-A, 19-B; Dunn Aff't, ¶ 24)

26. Conn. Gen. Stat. § 53-247 (c) (1) prohibits an individual from knowingly owning, possessing, keeping, or training any animal engaged in the exhibition of fighting for amusement or gain. Violation of said statute is a class D felony.
27. Conn. Gen. Stat. § 53-247 (c) (2) prohibits any individual from knowingly owning, possessing, keeping or training any animal *with the intent* that it be engaged in the exhibition of fighting for amusement or gain. Violation of said statute is a class D felony.
28. Conn. Gen. Stat. § 53-247 (c) (3) prohibits any act described in subsections (1) and (2) to take place on premises under an individual's control. Violation of said statute is a class D felony.
29. On the basis of the condition of the dogs and the various paraphernalia recovered at the property, the seven pit bull breed dogs were by a preponderance of the evidence likely kept, owned, possessed, and/or trained for the purpose of an exhibition of fighting for amusement or gain, and were likely kept, owned, possessed, and/or trained with the *intent* that they be utilized in an exhibition of fighting for amusement or gain.
30. On the basis of the various paraphernalia recovered at the property, it is likely that the property owned by the Defendant, Nathaniel Sebastian Martinez, had acts described in Conn. Gen. Stat. § 53-247 (c) (1) and (2) on said property.
31. Based upon the foregoing, the seven pit bull dogs that are the subject of this petition were neglected and/or cruelly treated in violation of Conn. Gen. Stat. §§ 22-329a (b) and (g).

WHEREFORE, Petitioner respectfully requests that the Court grant the following relief pursuant to Conn. Gen. Stat. §§ 22-4c (a) (3), 22-328, 22-329, and 22-329a:

1. That, pursuant to Conn. Gen. Stat. § 22-329a (d), the Court issue an order vesting in the Connecticut Department of Agriculture the temporary care and custody of the seven pit bull dogs described in this Verified Petition pending an ownership hearing on the petition. In the alternative, that the Court issue an order to the Defendant, Nathaniel Sebastian Martinez, to show cause why the Court shall not vest in the Connecticut Department of Agriculture the temporary care and custody of the seven pit bull dogs, pursuant to Conn. Gen. Stat. § 22-329a (d). Pursuant to Conn. Gen. Stat. § 22-329a (d), a hearing on temporary care and custody shall be held not later than fourteen (14) days after issuance of an order to show cause or an order vesting temporary care and custody to the Department of Agriculture.

2. That, following issuance of an order vesting the Connecticut Department of Agriculture the temporary care and custody of the seven pit bull dogs, that pursuant to Conn. Gen. Stat. § 22-329a (f), the Defendant, Nathaniel Sebastian Martinez, relinquish ownership of any and all of the seven pit bull dogs for which he claims ownership, or post a surety or cash bond in the amount of five hundred dollars (\$500.00) for each of the seven pit bull dogs for which he claims ownership that has been placed in the temporary care of the Connecticut Department of Agriculture.

3. That the Court make a finding pursuant to Conn. Gen. Stat. §§ 22-329a (b) and (g) that the seven pit bull dogs at issue were neglected and/or were cruelly treated in violation of Conn. Gen. Stat. § 53-247.

4. That the Court vest permanent ownership and custody of the seven pit bull dogs at issue with the Connecticut Department of Agriculture pursuant to Conn. Gen. Stat. § 22-329a (g).

5. That the Court order such other and additional relief as is just and equitable to effectuate the purposes of this action.

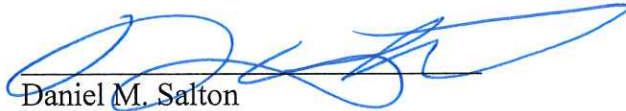
This action is brought by the State of Connecticut and therefore, it is not liable for any costs in this action.

Dated at Hartford, Connecticut this 20th day of October, 2021.

PLAINTIFF
STATE OF CONNECTICUT
EX REL, JEREMIAH DUNN
CHIEF STATE ANIMAL CONTROL OFFICER

WILLIAM TONG
ATTORNEY GENERAL

BY:



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Please enter the appearance of:
WILLIAM TONG
ATTORNEY GENERAL

By: Daniel M. Salton, Assistant Attorney General



Daniel M. Salton
Juris Number 437042
Commissioner of the Superior Court

VERIFICATION

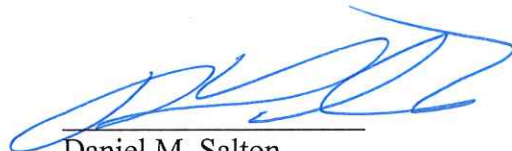
STATE OF CONNECTICUT)
) ss. Hartford
COUNTY OF HARTFORD)

Personally, appeared Jeremiah Dunn, State of Connecticut, Chief State Animal Control Officer, the subscriber, and made oath to the truth of the matters contained in the aforesaid complaint.



Jeremiah Dunn
Chief State Animal Control Officer

Sworn and subscribed to before me on this 20th day of October, 2021.



Daniel M. Salton
Commissioner of the Superior Court

Docket No.

STATE OF CONNECTICUT <i>EX REL</i> ,	:	SUPERIOR COURT
JEREMIAH DUNN,	:	
CHIEF STATE ANIMAL CONTROL OFFICER	:	JUDICIAL DISTRICT
<i>Petitioner,</i>	:	OF HARTFORD
	:	
v.	:	AT HARTFORD
	:	
SEVEN PIT BULL DOGS	:	
AND NATHANIAL SEBASTIAN MARTINEZ,	:	
<i>Defendants and Noticed Owners.</i>	:	OCTOBER 20, 2021

**AFFIDAVIT OF CHIEF STATE ANIMAL CONTROL OFFICER
JEREMIAH DUNN IN SUPPORT OF THE STATE’S PETITION**

STATE OF CONNECTICUT)
) ss. Hartford, Connecticut
 COUNTY OF HARTFORD)

I, Jeremiah Dunn, being duly sworn, depose and say:

1. I am over 18 years of age and believe in the obligation of an oath.
2. I am the Chief State Animal Control Officer for the Connecticut Department of Agriculture. I have been employed in my current position for one year and eight months. As part of my employment, I have attended and successfully completed the Connecticut Animal Control Officers certification training, presented by the Department of Agriculture. I am a certified Animal Control Officer of the State of Connecticut.
3. Prior to my employment as the Chief State Animal Control Officer, I was a sworn officer of the Clinton, Connecticut Police Department, for twenty-seven years. Prior to employment at the Clinton Police Department, I was a sworn officer of the Old Lyme, Connecticut, Police Department for nine years. I have extensive training and experience in criminal investigation.

4. As Chief State Animal Control Officer, I am charged and authorized pursuant to Conn. Gen. Stat. § 22-328 with the supervision and enforcement of the statutes and regulations of the State of Connecticut respecting the treatment of animals, including Chapter 435 of the General Statutes governing the treatment of dogs and other animals. I am further authorized pursuant to Conn. Gen. Stat. § 22-329 to interfere and act to prevent the cruel treatment of any dog or other animal in this jurisdiction.

5. On August 2, 2021, I was informed that the Connecticut State Police's State Organized Crime Investigative Task Force (the "State Police") in June, 2021, had begun to assist the Suffolk County, New York Police Department (the "SCPD") with an ongoing investigation in a multi-state dog fighting criminal organization.

6. On July 31, 2021, the State Police, pursuant to a search and seizure warrant from the Superior Court of Connecticut, executed a search of a property located at 109 Britannia Street, Meriden, CT 06450. During the course of the search of the property, the State Police discovered eight dogs, appearing to be of a pit-bull breed, kept in cages on the property, along with a significant amount of evidence in support that said dogs were being owned, kept, possessed, and/or trained for the purpose of dog fighting, in violation of Conn. Gen. Stat. § 53-247 (c).

7. On September 3, 2021, the State of Connecticut commenced an action to permanently vest ownership of said dogs into the custody of the Connecticut Department of Agriculture (the "Department"). On that same day, the Superior Court of Connecticut (*Sheriden, J.*), vested temporary custody of the eight pit bull dogs in the Department. The case name for said action, which as of this filing is still ongoing, is *State of Connecticut*

ex rel Jeremiah Dunn, Chief State Animal Control Officer v. Eight Pit Bull Dogs, et al.,
No. HHD-CV21-6146562-S.

8. As part of the ongoing investigation with the State Police and SCPD, I was informed on September 22, 2021 that the State Police believed a second property at 968 Grassy Hill Road, Orange, CT (the “property”), may contain dogs that were also being owned, kept, possessed, and/or trained for the purpose of dog fighting. As a result, the State Police requested my assistance in executing a search and seizure of the property.

9. On September 30, 2021, the State Police sought and received a search and seizure warrant from the Superior Court of Connecticut that found there was probable cause that dogs on the property were being owned, kept, possessed and/or trained for the purpose of an exhibition of fighting for the purpose of entertainment or gain, in violation of Conn. Gen. Stat. § 53-247 (c). The warrant authorized the seizure of any and all dogs found on the property and that said I, as Chief State Animal Control Officer, take physical custody of said animals.

10. On October 5, 2021, the State Police, pursuant to said warrant, executed a search of the property located at 968 Grassy Hill Road, Orange, CT. The search occurred at 10:45 am. I was present for the search, as were State Animal Control Officers Charles DellaRocco, Tanya Wescovich, and Gary Wilson from the Connecticut Department of Agriculture. Additionally present for the search were Animal Control Officers Marc Ruby and Dan Fiore of Milford Animal Control, an officer of the Orange Police Department, and officers from the SCPD.

11. The property is approximately three-quarters of an acre and consists of a green cape-style house with a two-car detached garage located to the southwest of the house. Behind the garage is a detached shed. In the southwest portion of the property, to the extreme rear of the backyard, was an area fenced with a wooden panel fence.
12. Seven pit bull breed dogs, of varying genders and coloring, were discovered inside the fenced area in the backyard. Each dog was caged separately from one another in chain-link cages.
13. The fenced area was kept in a highly overgrown state, with significant amounts of weeds and vegetation pressing into the fenced area. Portions of the wooden fence had collapsed and were leaning on some of the chain-link cages.
14. The chain-link cages were open and exposed to the elements, with no roofing present. Inside each chain-link cage were makeshift doghouses made of varying materials. Several appeared to be made from wood, while others were fashioned from cinderblocks and cut piping. All of the doghouses were improperly small for the animals within the cages, leaving them virtually no room to move while in the covered area. There was no other covering against weather inside the cages.
15. There was no flooring on the cages; instead, each cage was driven into the ground around it. Most of the ground in the area was extremely muddy and wet. There was a significant and unhealthy amount of solid dog waste in the cages, indicating they had not been cleaned in a significant period of time. The dogs would be forced to move through the solid waste while in the cages. Photographs of the cages and the makeshift doghouses are attached hereto as Exhibits 1-A through 1-G.

16. A similar amount of solid waste was discovered inside rusted dog crates located inside the shed on the property.

17. All seven dogs were tethered inside of their cages. The tethers were made from thick chains. Pursuant to Conn. Gen. Stat. § 22-350a (a), it is illegal to tether a dog to a stationary object with a tether that allows for less than eight feet of movement in any one direction. Additionally, it is illegal under that section to tether an animal without swivels inside the tether to prevent twisting and tangling. Finally, it is illegal under that section to tether an animal with tethers made of chains more than one-quarter inch thick. The tethers in which the seven pit bull breed dogs were discovered violate all three of these requirements.

18. Upon discovery, it was apparent that the dogs were being kept in conditions severely injurious to their well-being. The cages in which the dogs were kept were exposed to the elements, unclean, and had inadequate housing for the dogs; the dogs were further illegally tethered inside the cages, preventing adequate movement and putting them at risk of injury from the oversized and improperly restrictive chains.

19. Upon his return to the property, one Nathaniel Sebastian Martinez, who was identified by the State Police as the owner of the property, claimed that he owned all seven dogs. According to the Town Clerk of Orange, CT, Mr. Martinez has no licenses for any of the dogs on the property, nor was any property substantiating his claim recovered on the property.

20. Upon questioning by ACO Wescovich, Mr. Martinez provided names for all seven dogs. The seven dogs were identified and initially observed as follows:

- a.* A black and white female pit bull breed dog named “Vera” Vera is approximately four-to-five years old. She was observed to have very long toenails. A photograph of Vera is attached as Exhibit 2-A.
- b.* A dark brindle female pit bull breed dog named “Angie.” Angie is approximately eight years old. She was observed to have very long toenails and healed scars along her head and body. A photograph of Angie is attached as Exhibit 2-B.
- c.* A tan brindle female pit bull breed dog named “Zebra.” Zebra is approximately six years old. She was observed to have very long toenails. A photograph of Zebra is attached as Exhibit 2-C.
- d.* A black and white-chested male pit bull breed dog named “Sypher.” Sypher is approximately two years old. He was observed to have very long toenails. A photograph of Sypher is attached as Exhibit 2-D.
- e.* A black and white-faced male pit bull breed dog named “Mugshot.” Mugshot is approximately five years old. He was observed to have very long toenails. A photograph of Mugshot is attached as Exhibit 2-E.
- f.* A tan and white male pit bull breed dog named “Horris.” Horris is approximately eight years old. He was observed to have a large scar on his upper left side lip, measuring approximately two inches. A photograph of Horris is attached as Exhibit 2-F.

g. A brown and white-mustached female pit bull breed dog named "Lucy." Lucy is approximately five years old. A photograph of Lucy is attached as Exhibit 2-G.

21. A number of items were also seized on that property, described in the Affidavit of Detective Michael Grabowski, dated October 20, 2021. These items include, but are not limited to, items designed to build strength and stamina in dogs, such as a dog treadmill and weighted leather collars, which were discovered inside the shed on the property, as well as a scrapbook detailing breeding stock, magazines advertising and promoting dog fighting, and advertisements for fighting dogs.

22. Additionally notable is the extensive veterinary medications recovered from the property. Dexamethazone, Marcaine, and Lutalyse are all controlled substances only to be administered by or on order of a veterinarian. No paperwork authorizing their use was recovered on the property. Notably, the Lutalyse recovered on the property is only authorized for use in female cattle, swines, and mares. The Strongoid Paste recovered on the property is similarly only formulated for use on horses. There were also significant amounts of supplies aimed at healing injuries to dogs, including Blood Stop Powder, a coagulant medication designed to heal lacerations and other bleeding injuries in dogs, as well as a disposable skin stapler and a benzalkonium chloride antiseptic.

23. Of significant concern was the listing of injuries, illnesses and treatments along with treatment times recovered by the State Police. None of the recommended treatments or treatment times appear consistent with addressing the illnesses or injuries described.

24. The discovery of a breeding stand on site is of additional concern. While not illegal in Connecticut, breeding stands are highly discouraged due to them creating forced mating between dogs.

25. Subsequent to their seizure, and with the assistance of Milford ACOs Ruby and Fiore, the dogs were brought to the Animal Clinic of Milford for veterinary examination. Clinical summaries of those examinations, attached hereto as Exhibits 3 through 9, reveal the following:

a. Vera was considered in good health generally, but was diagnosed to have an ear infection and presented as unclean, with overgrown nails that required trimming. The examination summary for Vera is attached hereto as Exhibit 3.

b. Angie was diagnosed to be in poor body condition, possibly from malnutrition. She presented as having a poor hair coat condition and was noted to have multiple areas of scarring and hair loss, with highly overgrown nails and overgrown canine teeth. Notably, Angie has markers indicating she has given birth to several litters. The examination summary for Angie is attached hereto as Exhibit 4.

c. Zebra was diagnosed with an ear infection and presented as unclean, with overgrown nails that needed trimming. It was also noted that she had a broken claw on her right foot that required treatment for bleeding and bandaging. The examination summary for Zebra is attached hereto as Exhibit 5.

d. Sypher was diagnosed to be in poor body condition, possibly due to malnutrition, and highly overgrown nails. He further presented with eye

inflammation with a discharge. He presented as unclean, and had dried solid waste matter on his rear, which was possibly attributable to poor housing conditions. The examination summary for Sypher is attached hereto as Exhibit 6.

e. Mugshot was diagnosed to be in poor body condition, possibly due to malnutrition, with scars on his face. It was noted by the examiner that he had a notch missing from one ear, likely due to trauma or injury. He presented as unclean and had highly overgrown nails. The examination summary for Mugshot is attached hereto as Exhibit 7.

f. Horris was diagnosed to be in poor body condition and presented as unclean. The scar on his face was possibly due to a bite wound trauma, and the examination revealed an oral mass with dental disease and overgrown nails. The examination summary for Hours is attached hereto as Exhibit 8.

g. Lucy was diagnosed in poor condition, with dry, flaky skin and callused lesions that the examiner attributed as possibly due to poor housing. She was diagnosed with a heart murmur and eye inflammation with discharge. The examination summary for Lucy is attached hereto as Exhibit 9.

26. Taken together these examinations reveal that the conditions of all seven dogs located on the property were extremely poor, with most having medical concerns related to their unclean condition and poor nutrition and housing. Several of the animals have scarring consistent with dog fighting, and at least one has been bred repeatedly.

27. Following examination, the dogs were transported to the Milford Animal Control facility, located at 664 East Broadway, Milford CT. The dogs are being cared for by the

Milford Animal Control Unit on behalf of the Department of Agriculture, where they have received veterinary care and are receiving proper care, food, and water daily.

28. Based upon the recovered evidence and upon examination of the dogs, it appears that the dogs were owned, possessed, kept, trained and/or made to engage in dog fighting. It further appears that the property was a site for the keeping and training of dogs for the purpose of dog fighting, and that the site was actively used as a site for breeding dogs for the purpose of dog fighting.

29. Pursuant to General Statutes § 22-247 (c) (1), it is a class D felony to knowingly own, possess, keep or train any animal engaged in the exhibition of fighting for amusement or gain. Pursuant to General Statutes § 22-247 (c) (2), it is a class D felony to knowingly own, possess, keep or train any animal with the *intent* that it be engaged in the exhibition of fighting for amusement or gain. Pursuant to General Statutes § 22-247 (c) (3), it is a class D felony to permit any act described in subsections (1) or (2) to take place on premises under a person's control.

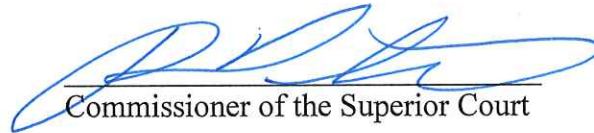
30. Based upon the evidence articulated above and upon my information and belief, there is a preponderance of evidence to support the conclusion that the seven pit bull breed dogs that are the subject to this petition were subjected to neglect and cruelty, in that they were owned, possessed, kept and trained in violation of all three subsections of General Statutes § 22-247 (c) articulated above.

I, Jeremiah Dunn, do hereby swear that the contents of the foregoing affidavit are true and accurate to the best of my knowledge and belief.



Chief Animal Control Officer Jeremiah Dunn

Subscribed and sworn to before me this 20th day of October, 2021, at Hartford, Connecticut.



Commissioner of the Superior Court

EXHIBIT 1



EXHIBIT 1-A



EXHIBIT 1-B



EXHIBIT 1-C



EXHIBIT 1-D



EXHIBIT 1-E



EXHIBIT 1-F



EXHIBIT 1-G

EXHIBIT 2



EXHIBIT 2-A: "Vera"



EXHIBIT 2-B: "Angie"



EXHIBIT 2-C: "Zebra"



EXHIBIT 2-D: "Sypher"



EXHIBIT 2-E: "Mugshot"



EXHIBIT 2-F: “Horris”



EXHIBIT 2-G: "Lucy"

EXHIBIT 3



ANIMAL CLINIC OF MILFORD
WHERE PETS ARE TREATED LIKE FAMILY!

Animal Clinic of Milford
100 Gulf St
Milford, Connecticut, 06460
Ph 203-882-8311
Email
animalclinicofmilford@gmail.com

Animal No. 115378
Printed At 10-07-2021
Printed By Michelle Holmes

CLINICAL SUMMARY

Clinical Summary for Impound# 081

Client Details

Name State of Connecticut
Animal Control
Address 450 Columbus Boulevard
Suite 702
Hartford, CT, 06103
Phone 860-819-1107
860-713-2567

Patient Details

Name Impound# 081
Species Canine (Dog)
Breed Pit Bull Mix
Age Not Set
Sex Female

Health Status

Date/Time	Weight (lb)	Temp(°F)	Heart Rate	Respiratory Rate	BCS	CRT	MM	Attitude
10-05-2021 1:52:06pm	39.80	100.0	140	60	4.0/9.0	1-2 sec	Pink	BAR

Presenting Problem

Exam

Physical Exam

10-05-2021 2:01:04pm, Charlin Pereira

Intg: dirty coat. no lesions noted

MS: No lameness appreciated, no other abnormalities appreciated

CV: No HM, no arrhythmia, Normal MM and CRT, no other abnormalities appreciated

Resp: Normal BVS, No Cough, No Sneezing, No nasal discharge, no other abnormalities appreciated

GI: No vomiting or diarrhea reported or appreciated on exam today, normal non-painful abdominal palpation, no other abnormalities appreciated

UG: Drinking normally, urinating normally, normal frequency and volume, no other abnormalities appreciated

PLN: Lymph nodes are all within normal limits, no other abnormalities appreciated

Neuro: Ambulatory on all 4 limbs, no neck pain or spinal pain, no other abnormalities appreciated

Eyes: No corneal abnormalities, no lid abnormalities, normal PLR, appears visual, no other abnormalities appreciated

Ears: erythematous AU

Oral: Normal mucus membranes, little to no calculus appreciated, not swellings, owner reports normal eating habits, no other abnormalities appreciated

Behavior: No abnormal behavior demonstrated on exam today or reported by owner

Assessments

10-05-2021 2:08:18pm, Charlin Pereira




Animal Clinic of Milford
100 Gulf St
Milford, Connecticut, 06460
203-882-8311
animalclinicofmilford@gmail.com

Otitis extern AU


 Plans

10-05-2021 2:08:22pm, Charlin Pereira

PE

 Therapeutic / Procedure

10-05-2021 2:41:24pm, Thomas Maley
Nail Trim - Routine

 Medication

Date/Time	Drug Name	Qty	Instructions	Prescribed By
10-05-2021 2:34:25pm	Animax Ointment 15ml	1	APPLY A LIBERAL AMOUNT TO EACH EAR 2XDAY FOR 14 DAYS.	Charlin Pereira

EXHIBIT 4



ANIMAL CLINIC OF MILFORD
WHERE PETS ARE TREATED LIKE FAMILY!

Animal Clinic of Milford
100 Gulf St
Milford, Connecticut, 06460
Ph 203-882-8311
Email
animalclinicofmilford@gmail.com

	CLINICAL SUMMARY
Animal No.	115379
Printed At	10-07-2021
Printed By	Michelle Holmes

Clinical Summary for Impound# 082

Client Details

Name	State of Connecticut Animal Control	Phone	860-819-1107 860-713-2567
Address	450 Columbus Boulevard Suite 702 Hartford, CT, 06103		

Patient Details

Name	Impound# 082	Age	Not Set
Species	Canine (Dog)	Sex	Female
Breed	Pit Bull Mix		

Health Status

Date/Time	Weight (lb)	Temp(°F)	Heart Rate	Respiratory Rate	BCS	CRT	Attitude
10-05-2021 2:08:18pm	37.50	99.5	136	50	3.0/9.0	1-2 sec	BAR

Presenting Problem

Exam

History

10-05-2021 2:01:32pm, Thomas Maley

Animal control

Physical Exam

10-05-2021 2:01:43pm, Thomas Maley

Intg: Skin is in generalized poor condition- multiple areas of scaring, alopecia, poor hair coat condition, grossly over grown nails

MS: No lameness appreciated, no other abnormalities appreciated

CV: No HM, no arrhythmia, Normal MM and CRT, no other abnormalities appreciated

Resp: Normal BVS, No Cough, No Sneezing, No nasal discharge, no other abnormalities appreciated

GI: No vomiting or diarrhea reported or appreciated on exam today, normal non-painful abdominal palpation, no other abnormalities appreciated

UG: Multiple mammary glands showing multiple litters

PLN: Lymph nodes are all within normal limits, no other abnormalities appreciated

Neuro: Ambulatory on all 4 limbs, no neck pain or spinal pain, no other abnormalities appreciated

Eyes: No corneal abnormalities, no lid abnormalities, normal PLR, appears visual, no other abnormalities appreciated

Ears: Normal ear canals, little to no debris or erythema of the canals, no clinical signs of discomfort reported, no other abnormalities appreciated



Animal Clinic of Milford
100 Gulf St
Milford, Connecticut, 06460
203-882-8311
animalclinicofmilford@gmail.com

Oral: enamel hyperplasia on canines, generalized dental calculus and staining

Behavior: No abnormal behavior demonstrated on exam today or reported by owner

Assessments

10-05-2021 2:04:36pm, Thomas Maley

Poor body condition- 3/9 r/o nutritional deficits

Poor hair coat condition and generally dirty- not well kept

Severely over grown nails- obviously not kept trimmed regularly

Enamel hyperplasia- r/o damage from chewing vs high fever as juvenile

Plans

10-05-2021 2:07:49pm, Thomas Maley

exam

Recheck

10-05-2021 2:07:55pm, Thomas Maley

as needed

Diagnostic Request

10-05-2021 2:42:21pm, Thomas Maley

- Ova and Parasite with Giardia

Antech Laboratories

Therapeutic / Procedure

10-05-2021 2:18:17pm, Thomas Maley

Nail Trim - Routine

EXHIBIT 5



ANIMAL CLINIC OF MILFORD
WHERE PETS ARE TREATED LIKE FAMILY!

Animal Clinic of Milford
100 Gulf St
Milford, Connecticut, 06460
Ph 203-882-8311
Email
animalclinicofmilford@gmail.com

Animal No. 115380
Printed At 10-07-2021
Printed By Michelle Holmes

CLINICAL SUMMARY

Clinical Summary for Impound# 083

Client Details

Name State of Connecticut
Animal Control
Address 450 Columbus Boulevard
Suite 702
Hartford, CT, 06103
Phone 860-819-1107
860-713-2567

Patient Details

Name Impound# 083
Species Canine (Dog)
Breed Pit Bull Mix
Age Not Set
Sex Female

Health Status

Date/Time	Weight (lb)	Heart Rate	CRT	MM	Attitude	Notes
10-05-2021 2:09:58pm	36.20	180	1-2 sec	Pink	BAR	panting

Presenting Problem

Exam

Physical Exam

10-05-2021 2:30:53pm, Charlin Pereira

Intg: dirty coat, no lesions noted, overgrown claw, broken claw of digit 3 of RF

MS: No lameness appreciated, no other abnormalities appreciated

CV: No HM, no arrhythmia, Normal MM and CRT, no other abnormalities appreciated

Resp: Normal BVS, No Cough, No Sneezing, No nasal discharge, no other abnormalities appreciated

GI: No vomiting or diarrhea reported or appreciated on exam today, normal non-painful abdominal palpation, no other abnormalities appreciated

UG: Drinking normally, urinating normally, normal frequency and volume, no other abnormalities appreciated

PLN: Lymph nodes are all within normal limits, no other abnormalities appreciated

Neuro: Ambulatory on all 4 limbs, no neck pain or spinal pain, no other abnormalities appreciated

Eyes: No corneal abnormalities, no lid abnormalities, normal PLR, appears visual, no other abnormalities appreciated

Ears: erythematous with mild brown exudate AU

Oral: 1/3 gingivitis, 2/3 dental calculus

Behavior: No abnormal behavior demonstrated on exam today or reported by owner

Assessments

10-05-2021 2:32:24pm, Charlin Pereira



Animal Clinic of Milford
100 Gulf St
Milford, Connecticut, 06460
203-882-8311
animalclinicofmilford@gmail.com

Otitis externa AU
Broken claw
PD grd ~2

Plans

10-05-2021 2:32:38pm, Charlin Pereira

NT
bandage
Animax

P friendly and high energy- could not control bleeding of claw with quikstop or silver nitrate stick- bandage applied

Therapeutic / Procedure

10-05-2021 2:35:53pm, Charlin Pereira
Bandage - Routine

10-05-2021 2:19:17pm, Thomas Maley
Nail Trim - Routine

Medication

Date/Time	Drug Name	Qty	Instructions	Prescribed By
10-05-2021 2:34:18pm	Animax Ointment 15ml	1	APPLY A LIBERAL AMOUNT TO EACH EAR 2X/DAY FOR 14 DAYS,	Charlin Pereira

EXHIBIT 6



ANIMAL CLINIC OF MILFORD
WHERE PETS ARE TREATED LIKE FAMILY!

Animal Clinic of Milford
100 Gulf St
Milford, Connecticut, 06460
Ph 203-882-8311
Email
animalclinicofmilford@gmail.com

	CLINICAL SUMMARY
Animal No.	115381
Printed At	10-07-2021
Printed By	Michelle Holmes

Clinical Summary for Impound# 084

Client Details

Name	State of Connecticut Animal Control	Phone	860-819-1107 860-713-2567
Address	450 Columbus Boulevard Suite 702 Hartford, CT, 06103		

Patient Details

Name	Impound# 084	Age	Not Set
Species	Canine (Dog)	Sex	Male
Breed	Pit Bull Mix		

Health Status

Date/Time	Weight (lb)	Temp(°F)	Heart Rate	BCS	CRT	MM	Attitude	Notes
10-05-2021 2:10:05pm	39.20	101.9	120	3.5/9.0	1-2 sec	Pink	BAR	Panting

Presenting Problem

Exam

Physical Exam

10-05-2021 2:11:30pm, Thomas Maley

Intg: Body condition below appropriate, dirty, dried fecal matter on rear hair

MS: No lameness appreciated, no other abnormalities appreciated

CV: No HM, no arrhythmia, Normal MM and CRT, no other abnormalities appreciated

Resp: Normal BVS, No Cough, No Sneezing, No nasal discharge, no other abnormalities appreciated

GI: No vomiting or diarrhea reported or appreciated on exam today, normal non-painful abdominal palpation, no other abnormalities appreciated

UG: Drinking normally, urinating normally, normal frequency and volume, no other abnormalities appreciated

PLN: Lymph nodes are all within normal limits, no other abnormalities appreciated


Neuro: Ambulatory on all 4 limbs, no neck pain or spinal pain, no other abnormalities appreciated

Eyes: Bilateral conjunctivitis, crusty eye discharge on the right eye

Ears: Normal ear canals, little to no debris or erythema of the canals, no clinical signs of discomfort reported, no other abnormalities appreciated

Oral: Normal mucus membranes, little to no calculus appreciated, not swellings, owner reports normal eating habits, no other abnormalities appreciated

Behavior: Mouthy for exam

 Assessments

10-05-2021 2:14:04pm, Thomas Maley

Poor body condition- r/o poor nutrition

nails are grossly over grown r/o poor husbandry

very dirty hair coat not kept up with appropriately r/o poor housing or poor husbandry

Fecal matter in rear end hair coat r/o poor housing conditions

 Plans

10-05-2021 2:16:15pm, Thomas Maley

exam


eye meds

nail trim

 Recheck


10-05-2021 2:16:28pm, Thomas Maley

as needed

 Therapeutic / Procedure

10-05-2021 2:18:05pm, Thomas Maley

Nail Trim - Routine

 Medication

Date/Time	Drug Name	Qty	Instructions	Prescribed By
10-05-2021 2:17:42pm	Neo/Poly/Bac Ophthalmic Ointment	1	Apply a small amount to affected eye 2-4x per day as directed by veterinarian	Thomas Maley

EXHIBIT 7



ANIMAL CLINIC OF MILFORD
WHERE PETS ARE TREATED LIKE FAMILY!

Animal Clinic of Milford
100 Gulf St
Milford, Connecticut, 06460
Ph 203-882-8311
Email
animalclinicofmilford@gmail.com

	CLINICAL SUMMARY
Animal No.	115382
Printed At	10-07-2021
Printed By	Michelle Holmes

Clinical Summary for Impound# 085

Client Details

Name	State of Connecticut Animal Control	Phone	860-819-1107 860-713-2567
Address	450 Columbus Boulevard Suite 702 Hartford, CT, 06103		

Patient Details

Name	Impound# 085	Age	Not Set
Species	Canine (Dog)	Sex	Male
Breed	Pit Bull Mix		

Health Status

Date/Time	Weight (lb)	Temp(°F)	Heart Rate	BCS	CRT	MM	Attitude	Notes
10-05-2021 2:21:17pm	33.80	103.4	140	3.5/9.0	1-2 sec	Pink	BAR	Panting

Presenting Problem

Exam

History

10-05-2021 2:21:26pm, Thomas Maley

Animal control

Physical Exam

10-05-2021 2:21:35pm, Thomas Maley

Intg: Dirty hair coat, scares on face

MS: No lameness appreciated, no other abnormalities appreciated

CV: No HM, no arrhythmia, Normal MM and CRT, no other abnormalities appreciated

Resp: Normal BVS, No Cough, No Sneezing, No nasal discharge, no other abnormalities appreciated

GI: No vomiting or diarrhea reported or appreciated on exam today, normal non-painful abdominal palpation, no other abnormalities appreciated

UG: Drinking normally, urinating normally, normal frequency and volume, no other abnormalities appreciated

PLN: Lymph nodes are all within normal limits, no other abnormalities appreciated

Neuro: Ambulatory on all 4 limbs, no neck pain or spinal pain, no other abnormalities appreciated

Eyes: No corneal abnormalities, no lid abnormalities, normal PLR, appears visual, no other abnormalities appreciated

Ears: Normal ear canals, little to no debris or erythema of the canals, no clinical signs of discomfort reported, no other abnormalities appreciated



Animal Clinic of Milford
100 Gulf St
Milford, Connecticut, 06460
203-882-8311
animalclinicofmilford@gmail.com

Oral: Moderate dental calculus and staining

Behavior: No abnormal behavior demonstrated on exam today or reported by owner

Assessments

10-05-2021 2:24:07pm, Thomas Maley

poor body condition, underweight r/o poor nutrition care

Dirty hair coat- r/o poor husbandry

Grossly over grown nails

Missing notch on the right ear tip r/o previous trauma

Plans

10-05-2021 2:25:04pm, Thomas Maley

exam

nail trim

Recheck

10-05-2021 2:25:10pm, Thomas Maley

as needed

Therapeutic / Procedure

10-05-2021 2:27:26pm, Thomas Maley

Nail Trim - Routine

EXHIBIT 8



ANIMAL CLINIC OF MILFORD
WHERE PETS ARE TREATED LIKE FAMILY!

Animal Clinic of Milford
100 Gulf St
Milford, Connecticut, 06460
Ph 203-882-8311
Email
animalclinicofmilford@gmail.com

Animal No. 115383
Printed At 10-07-2021
Printed By Michelle Holmes

CLINICAL SUMMARY

Clinical Summary for Impound# 086

Client Details

Name State of Connecticut
Animal Control
Address 450 Columbus Boulevard
Suite 702
Hartford, CT, 06103
Phone 860-819-1107
860-713-2567

Patient Details

Name Impound# 086
Species Canine (Dog)
Breed Pit Bull Mix
Age Not Set
Sex Male

Health Status

Date/Time	Weight (lb)	Temp(°F)	Heart Rate	CRT	MM	Attitude	Notes
10-05-2021 2:34:14pm	46.20	103.0	120	1-2 sec	Pink	BAR	Panting

Presenting Problem

Exam

History

10-05-2021 2:34:18pm, Thomas Maley

Animal control

Physical Exam

10-05-2021 2:34:25pm, Thomas Maley

Intg: Dirty hair coat, defect to the left lip extending ventral from the left nostril, over grown nails

MS: No lameness appreciated, no other abnormalities appreciated

CV: No HM, no arrhythmia, Normal MM and CRT, no other abnormalities appreciated

Resp: Normal BVS, No Cough, No Sneezing, No nasal discharge, no other abnormalities appreciated

GI: No vomiting or diarrhea reported or appreciated on exam today, normal non-painful abdominal palpation, no other abnormalities appreciated

UG: Drinking normally, urinating normally, normal frequency and volume, no other abnormalities appreciated

PLN: Lymph nodes are all within normal limits, no other abnormalities appreciated

Neuro: Ambulatory on all 4 limbs, no neck pain or spinal pain, no other abnormalities appreciated

Eyes: No corneal abnormalities, no lid abnormalities, normal PLR, appears visual, no other abnormalities appreciated

Ears: Normal ear canals, little to no debris or erythema of the canals, no clinical signs of discomfort reported, no other abnormalities appreciated



Animal Clinic of Milford
100 Gulf St
Milford, Connecticut, 06460
203-882-8311
animalclinicofmilford@gmail.com

Oral: Oral mass right side adjacent to tooth ~107, moderate dental calculus and staining

Behavior: No abnormal behavior demonstrated on exam today or reported by owner

Assessments

10-05-2021 2:36:37pm, Thomas Maley

Poor body condition- dirty r/o poor husbandry

Nail over grown

Oral mass and moderate dental disease

Defect in lip r/o trauma ie bite wound vs birth defect

Plans

10-05-2021 2:38:02pm, Thomas Maley

exam

nail trim

Recheck

10-05-2021 2:38:13pm, Thomas Maley

as needed

Therapeutic / Procedure

10-05-2021 2:38:20pm, Thomas Maley

Nail Trim - Routine

EXHIBIT 9



ANIMAL CLINIC OF MILFORD
WHERE PETS ARE TREATED LIKE FAMILY!

Animal Clinic of Milford
100 Gulf St
Milford, Connecticut, 06460
Ph 203-882-8311
Email
animalclinicofmilford@gmail.com

	CLINICAL SUMMARY
Animal No.	115384
Printed At	10-07-2021
Printed By	Michelle Holmes

Clinical Summary for Impound# 087

Client Details

Name	State of Connecticut Animal Control	Phone	860-819-1107 860-713-2567
Address	450 Columbus Boulevard Suite 702 Hartford, CT, 06103		

Patient Details

Name	Impound# 087	Age	Not Set
Species	Canine (Dog)	Sex	Female
Breed	Pit Bull Mix		

Health Status

Date/Time	Weight (lb)	Temp(°F)	Heart Rate	Respiratory Rate	CRT	MM
10-05-2021 2:32:58pm	31.30	101.4	110	30	1-2 sec	Pink

Presenting Problem

Exam

Physical Exam

10-05-2021 2:46:27pm, Charlin Pereira

Intg: dirty, dry flaky skin, callous like lesions present on lateral carpal regions and caudal thighs

MS: No lameness appreciated, no other abnormalities appreciated

CV: I/VI left sided/apical systolic heart murmur

Resp: Normal BVS, No Cough, No Sneezing, No nasal discharge, no other abnormalities appreciated

GI: No vomiting or diarrhea reported or appreciated on exam today, normal non-painful abdominal palpation, no other abnormalities appreciated

UG: Drinking normally, urinating normally, normal frequency and volume, no other abnormalities appreciated

PLN: Lymph nodes are all within normal limits, no other abnormalities appreciated

Neuro: Ambulatory on all 4 limbs, no neck pain or spinal pain, no other abnormalities appreciated

Eyes: OD: conjunctival hyperemia, crusts present

Ears: Normal ear canals, little to no debris or erythema of the canals, no clinical signs of discomfort reported, no other abnormalities appreciated

Oral: 2/3 dental calculus, 1/3 gingivitis

Behavior: No abnormal behavior demonstrated on exam today or reported by owner

Assessments

10-05-2021 2:48:15pm, Charlin Pereira



Animal Clinic of Milford
100 Gulf St
Milford, Connecticut, 06460
203-882-8311
animalclinicofmilford@gmail.com

Heart murmur-r/o physiologic vs pathologic
conjunctivitis- OD
Flaky, dry skin
callous like lesions- suspect pressure sores secondary to housing
PD grd 2

📅 Plans

10-05-2021 2:48:47pm, Charlin Pereira

PE
NT
Fluorescein stain
Neopolydex

🏠 Therapeutic / Procedure

10-05-2021 2:57:56pm, Charlin Pereira

Fluorescein Stain of Cornea

Outcome

negative

💊 Medication

Date/Time	Drug Name	Qty	Instructions	Prescribed By
10-05-2021 2:53:48pm	Neo/Poly/Dex Ophthalmic Suspension	1	APPLY 1 DROP TO THE RIGHT EYE 3X/DAY FOR THE NEXT 7 DAYS	Charlin Pereira

Docket No.

STATE OF CONNECTICUT <i>EX REL</i>	:	SUPERIOR COURT
JEREMIAH DUNN,	:	
CHIEF STATE ANIMAL CONTROL OFFICER	:	JUDICIAL DISTRICT
<i>Petitioner,</i>	:	OF HARTFORD
	:	
v.	:	AT HARTFORD
	:	
SEVEN PIT BULL DOGS	:	
AND NATHANIAL SEBASTIAN MARTINEZ,	:	
<i>Defendants and Named Owners.</i>	:	OCTOBER 20, 2021

**AFFIDAVIT OF DETECTIVE MICHAEL GRABOWSKI
IN SUPPORT OF THE STATE'S PETITION**

STATE OF CONNECTICUT))
) ss. Hartford, Connecticut
 COUNTY OF HARTFORD)

I, Michael Grabowski, being duly sworn, depose and say:

1. I am over 18 years of age and believe in the obligation of an oath.
2. I am a sworn member of the Connecticut State Police, with a rank of Detective. I have been a member of the Connecticut State Police for 9 years. I currently am assigned to the Statewide Organized Crime Investigative Task Force ("SOCITF"). Prior to my assignment of SOCITF, I was assigned to the Western District Major Crime Squad and the Central District Major Crime Squad.
3. As part of my duties as with the Connecticut State Police, I have extensive experience in the investigation of violent crimes, including homicides, robberies, and serious assaults. I also have experience in the investigation of financial crimes, electronic/cyber crimes, sex crimes, and property crimes. I further have specialized

training in the acquisition and analysis of digital evidence, and significant experience in said field, and in 2018 received a Juris Doctorate from the University of Connecticut.

4. On June 30, 2021, SOCITF began assisting the Suffolk County, New York Police Department (“SCPD”) with an ongoing investigation in a multi-state dog fighting criminal organization.

5. On July 31, 2021, SOCITF sought and was issued a search and seizure warrant from the Connecticut Superior Court authorizing search of a property located at 109 Britannia Street, Meriden, CT 06450. The search of said property resulted in the seizure of eight pit bull breed dogs, as well as a significant quantity of evidence in support of said dogs being kept and trained for the purpose of dog fighting.

6. At and around the same time of the July 31, 2021 search at 109 Britannia Street, Meriden, CT, the SCPD executed a series of search and arrest warrants throughout New York. Following of one of these arrests, a cell phone belonging to the arrestee was seized by the SCPD and forensically examined by the appropriate New York authorities.

7. Detective Elizabeth Tomlin, a sworn officer and member of the SCPD, established a record of text message communications existed on the cell phone between the arrestee and one Nathaniel Sebastian Martinez, with a primary residential address of 968 Grassy Hill Road, Orange, CT 06477.

8. On August 26, 2021, Detective Tomlin contacted me and relayed the information regarding the text message communications between the arrestee and Mr. Martinez. She additionally forwarded me three videos contained within the record of text

communications between the arrestee and Mr. Martinez. The videos depicted the following:

- a. The first video, which has a duration of thirty-five (35) seconds, depicts six separate dogs contained within six different chain link outdoor kennels. There appeared to be a wooden panel fence behind said kennels. Several of the dogs were chained or leashed inside of the cages.
- b. The second video, which has a duration of fifteen (15) seconds, depicts an organized fight between two roosters. One of the roosters proceeds over the course of the video to attack and peck the second rooster to a state of serious injury and/or death.
- c. The third video, which has a duration of forty-one (41) seconds, depicts an organized and observed fight between two roosters. Several individuals can be seen in the video observing the fight. The roosters in this video appear in a circular ring apparently built for fighting, and are released from individual pens at either side of the ring to commence the fight. As with the second video, one of the roosters in this video proceeds over the course of the video to attack and peck the second rooster to a state of serious injury and/or death.

9. On September 21, 2021, I conducted surveillance of 968 Grassy Hill Road, Orange, CT, and was able to observe a wooden panel fence matching the fence depicted by the first video sent to me by Detective Tomlin. I was additionally able to observe kennels matching those kennels depicted in first video sent to me by Detective Tomlin. During the course of my surveillance, I heard the barking of at least two different dogs

and was able to observe movement by at least two dogs within the kennels located on the property.

10. On September 30, 2021, SOCITF sought and was issued a search and seizure warrant from the Connecticut Superior Court for the property at 968 Grassy Hill Road, Orange, CT, attached hereto as Exhibit 1. The warrant articulated that there was probable cause that dogs were being kept on the property in violation of Conn. Gen. Stat. § 54-247 (c), and authorized the Chief State Animal Control Officer, Jeremiah Dunn, to take into his physical custody any dogs found and seized on the property. The warrant further authorized the seizure of any and all cell phones, mass data storage devices, computers, laptops, bulk cash, ledgers and/or records of gambling activity, veterinary medications, scales and/or weighing devices, items used to break a dog's jaw from a bite, and any other evidence related to dog fighting and/or the keeping of dogs for the purpose of fighting.

11. The deed to the property at 968 Grassy Hill Road, Orange, CT (the "property"), is recorded on the Orange land records as being held by Nathaniel Martinez, in Book No. 636, pages 1068-1069.

12. The property is a single-family residence with a backyard containing a detached garage and detached shed, as well as a make-shift structure partially enclosed by a wooden panel fence. The search warrant specifically authorized search of the entire property, including all detached structures.

13. On October 5, 2021, SOCITF executed a search of the property pursuant to the issued warrant. Conducting the search were members of SOCITF and the Connecticut

State Police, including myself and Detective Michael Zella, who took photographs during the course of the search. Also present at the search was the Chief State Animal Control Officer, Jeremiah Dunn, Animal Control Officers from the Connecticut Department of Agriculture and from Milford Animal Control, Detectives from the SCPD, and a Sargent from the Orange Police Department. During the course of the search of the property, the State Police discovered seven (7) dogs, appearing to be of a pit bull breed, kept in cages on the property. Each dog was housed in an individual cage and were of varying genders and colors. The dogs were taken into the care and custody of the Chief State Animal Control Officer and the Connecticut Department of Agriculture pursuant to the warrant, with the assistance of Milford's Animal Control Officers.

14. The dogs were located inside a fenced area located in the backyard of the property, which was partially covered by vegetation. A photograph of the fenced area is attached hereto as Exhibit 2. The wooden panel fencing in said area appeared partially collapsed, with portions of the fencing laying on the dogs' cages, a photograph of which is attached hereto as Exhibit 3. The interior of the fenced area was heavily weeded and overgrown, a photograph of which is attached hereto as Exhibit 4.

15. Prior to the dogs' seizure, Detective Zella took multiple photographs of the dogs within their cages, attached hereto as Exhibits 5-A through 5-G. The cages were made of chain links, interspersed with corrugated dividers. All of the cages had no floor, and were exposed to the ground. Similarly, none of the cages had roofs, and the interiors were entirely exposed to the elements. In each cage were small makeshift doghouses. As can be observed from Exhibits 5-A through 5-G, some of the doghouses were made from

wood, others from what appears to be cut piping. All of them were extremely small. A photograph of the entire set of cages as discovered by the State Police is attached hereto as Exhibits 6-A through 6-C.

16. Upon observation of the dogs, I noted that all of the dogs were kept tethered to chains while secured inside their cages. I further noted that the kennel area was not well kept, having a strong foul odor through the entire structure. I further observed a large amount of solid dog waste on the ground inside each cage that the dogs to which the dogs would have to walk through in moving within the cage. The ground inside the kennel area was muddy and wet, and at least three of the dogs were visibly shaking.

17. What appear to be additional makeshift doghouses were discovered behind the shed located in the backyard of the property, a photograph of which is attached hereto as Exhibit 7. Inside the shed were discovered multiple rusted pet carriers, a photograph of which is attached hereto as Exhibit 8.

18. Inside the shed located in the backyard, I observed a treadmill designed for use by dogs, photographs of which are attached hereto as Exhibit 9-A and 9-B. Said treadmill was of similar design and make as two treadmills seized from 109 Britannia Street, Meriden CT.

19. Found on a shelf in the master bedroom of house on the property was a scrapbook or ledger containing photographs of dogs along with breeding lineages and owners. A photograph of the scrapbook, as recovered, is attached hereto as Exhibit 10. The index of the scrapbook, a photograph of which is attached hereto as Exhibits 11-A through 11-C, contains entries for at least 80 dogs. Close examination of an entry reveals a picture of

the named dog, its name, owners, breeding lineage, weight, and fight statistics. An example, attached hereto as Exhibit 12, depicts a dog named “Candela,” allegedly owned by “Martinez & Costas,” who was sired by a dog named “Garibaldi,” is recorded at 35 lbs. and is noted as being a “2x winner off chain.” Another depicted in Exhibit 11-C is named “Snowman,” and is recorded as being owned by “Martinez,” is recorded at 45 lbs. and is noted as having “L – 1 W – 4 off the chain.” Snowman is also recorded as having been sired by a dog named “Rufus,” with an annotation that Rufus has had seven wins. These annotations are consistent with the entirety of the book of dogs.

20. On the same shelf were recovered various issues of a magazine titled the “The American Gamedog Times,” dated February and June 1991. Photographs of these are attached hereto as Exhibits 13 and 14. Notably, the front cover of the June issue describes such articles as “A Story About Gamedog Dealin” and “Why I Fight Dogs.” Additional documentation found in this paperwork and as seen in Exhibit 14 includes multiple advertisements and prices for various pit bull dogs, including pups.

21. Additionally, as defined in Appendix 31 of *Veterinary Forensics: Animal Cruelty Investigations*, 2nd Edition (Edited by Melinda Merck, 2013), attached hereto as Exhibit 36, “Game” or “Gameness” is either used to describe the sport of dogfighting itself, or “the combined qualities of courage, aggression, and tenacity in the face of utter exhaustion and possible death.” Gameness is a trait sought to be developed in fighting dogs that allows them to continue to be eager to fight or maintain aggression despite the threat of substantial injury. Such a trait is sought for and is either bred or conditioned through extensive training into fighting dogs.

22. Additional magazines, all focused on pit bull breed dogs, as well as advertisements, were recovered, photographs of which are attached hereto as Exhibits 15 and 16.
23. A brown leather binder with the term “Back Yard Boys” written on it, a photograph of which is attached hereto as Exhibit 17, contained numerous advertisements and breeding information for dogs, some of which are addressed to Nathaniel Martinez. These documents, photographs of which are attached hereto as Exhibits 18-A through 18-C, are dated as far back as 1986 and as recent as 2009.
24. Discovered on a desk in the basement of the property was a portable electronic scale, photographs of which are attached hereto as Exhibits 19-A and 19-B. Based upon my investigative research and experience, the use of such a hanging scale is consistent with weighing dogs before commencing dog fighting activities, as frequently there are limitations on weight classes in dog fighting. Additionally, variance in the weight of dogs may affect the odds or pay-out for wagers made on such fights. A second boxed portable pet scale was discovered during the search of the basement, photographs of which is attached hereto as Exhibits 20-A and 20-B.
25. During the search of the basement, a DVD entitled “Peleas de Gallos,” a photograph of which is attached hereto as Exhibit 21. Peleas de Gallos is the Spanish term for “cockfighting.” The subtitle of the DVD translates to “killers of the city of Torreón,” referring to Torreón, a city in the state of Coahuila, Mexico.
26. Also located in the basement was a box of veterinary supplies, a photograph of which is attached as Exhibit 22. This box of supplies included a box of tongue

depressors, a 30ml vial of Lutalyse, and a container of Strongoid Paste. Lutalyse is a dinoprost injectable, designed to induce labor or assist in breeding, and is recorded on the box as for use in “cattle, swine, and mares.” Notably, the medication also articulates that such may only be used by or on the order of a licensed veterinarian. Strongoid Paste is a compound of pyrantel pamoate used as an anti-worming compound for horses, as it is recorded on the box as an “Equine Anthelmintic.” A photograph of these medications is attached hereto as Exhibit 23.

27. Located on the desk in the basement was a set of veterinary needles and syringes, as well as a disposable skin stapler, photographs of which are attached hereto as Exhibits 24-A and 24-B.

28. Located in a metal container in the basement were additional veterinary supplies, a photograph of which is attached hereto as Exhibit 25. Notably included in this bucket were several deworming treatments, one of which is formulated for cattle and swine, as well as a syringe, measuring cup, and a turkey baster.

29. Additionally found in the basement was a paper with writing seemingly tracking various animal illnesses, the amount of time for treatment, and recommended treatments, photographs of which are attached hereto as Exhibits 26-A and 26-B. Notably included on the list are “Broken Limbs” to which there is proscribed a 5 day recovery period of “Bandages.” Also on the list is the issue of “Ugly” to which is proscribed a single day recovery period of “Accessories.”

30. Found in a notebook in the basement was a handwritten advertisement for bred “Patterdale Terriers,” a photograph of which is attached hereto as Exhibit 27. Notably,

the advertisement states the dogs are "Game Bred" and "not for looks but for performance." It further notes that "all breedings are planned years in advance."

31. Located on the wall of the basement were several flat leather collars with rings, a photograph of which is attached hereto as Exhibit 28. Upon information and belief, such collars are known to be used for aggression and agitation training. An additional flat collar was recovered from the basement, a photograph of which is attached hereto as Exhibit 29.

32. A toolbox was recovered from inside the detached shed, a photograph of which is attached hereto as Exhibit 30. Discovered in the toolbox more veterinary supplies, photographs of which are attached hereto as Exhibits 31-A and 31-B. Inspection of the supplies revealed more syringes, as well as a 100ml vial of veterinary-grade injectable Dexamethasone, and a 50ml vial of Marcaine, photographs of which are attached hereto as Exhibits 32-A and 32-B. Dexamethasone is a veterinary grade injection used to treat inflammation, and is also used as a diuretic to dehydrate a dog and lower its body weight. Marcaine is a trade name for bupivacaine HCL, which is a local anesthetic and nerve-blocking agent. Both Dexamethasone and Marcaine require either use by or on order of a veterinarian.

33. Additionally found in the shed was a bucket with a number of additional veterinary supplies, photographs of which are attached hereto as Exhibits 33-A and 33-B. Notably included in this bucket is Blood Stop Powder, which upon information and belief is a coagulant used to heal minor injuries and cuts in dogs. Additionally included in the bucket were two additional pyrantel pamoate deworming treatments and a benzalkonium

chloride antiseptic formulated for dogs, as well as two syringes and several measuring cups.

34. Found near the toolbox was a weighted harness, a photograph of which is attached hereto as Exhibit 34.

35. A breeding stand was discovered inside the shed during the course of the search, photographs of which are attached hereto as Exhibits 35-A and 35-B. A breeding stand is a type of device designed to restrain female dogs for the purpose of forcing or inducing breeding, preventing them from biting or moving away from the breeding male dog.

36. No dog licenses were recovered at the property. Inside the basement area, near some United State Airways paperwork was recovered a Connecticut Department of Agriculture Small Animal Health Certificate form, dated November 13, 2004, for an animal named "Brujo." The form was issued by a veterinarian located in Bridgeport, CT. On the basis of the information provided by Mr. Martinez to Animal Control Officer Tanya Wescovich, as recounted by the Affidavit of Chief Animal Control Officer Jeremiah Dunn, dated October 20, 2021, the name "Brujo" does not match with any of the seven pit bull dogs recovered during the October 5, 2021 search. Additionally, a registration was recovered in the basement for a dog name "Mia" issued by the "Bona Fide Kennel Club, Inc." to one Nate Savage of Bridgeport Connecticut, as seen in Exhibit 19-A. On the basis of the information provided by Mr. Martinez to ACO Wescovich, the name "Mia" does not match with any of the seven pit bull dogs recovered during the October 5, 2021 search.

37. Following his return to the property, the State Police detained Mr. Martinez. I advised Mr. Martinez of his rights pursuant to *Miranda v. Arizona*, 384 U.S. 436 (1966), because he was not free to leave the scene and I would be asking him possibly incriminating questions. In response to my inquiry, Mr. Martinez claimed that he was the owner of all seven dogs on the property.

38. Upon request, Mr. Martinez signed a consent to search and examine evidence form so as to allow immediate forensic examination of his cell phone, which was seized pursuant to the warrant.

39. Based upon the recovered evidence, it appears that the dogs seized by the Chief State Animal Control Officer pursuant to warrant were owned, possessed, kept, and/or trained for the purpose of in dog fighting. It further appears that the property was a site for the keeping, breeding, and/or training of dogs for the purpose of dog fighting.

40. Pursuant to General Statutes § 22-247 (c) (1), it is a class D felony to knowingly own, possess, keep or train any animal engaged in the exhibition of fighting for amusement or gain. Pursuant to General Statutes § 22-247 (c) (2), it is a class D felony to knowingly own, possess, keep or train any animal with the *intent* that it be engaged in the exhibition of fighting for amusement or gain. Pursuant to General Statutes § 22-247 (c) (3), it is a class D felony to permit any act described in subsections (1) or (2) to take place on premises under a person's control.

41. Based upon the evidence articulated above and upon my information and belief, there is a preponderance of evidence to support the conclusion that the eight dogs that are the subject to this petition were subjected to neglect and cruelty, in that they were owned,

possessed, kept and/or trained in violation of all three subsections of General Statutes § 22-247 (c), articulated above.

I, Michael Grabowski, do hereby swear that the contents of the foregoing affidavit are true and accurate to the best of my knowledge and belief.



Det. Michael Grabowski

Subscribed and sworn to before me this 20th day of October, 2021, at Hartford, Connecticut.



Commissioner of the Superior Court

EXHIBIT 1

**AFFIDAVIT AND APPLICATION
SEARCH AND SEIZURE WARRANT**

JD-CR-61 Rev. 3-10
C.G.S. §§ 54-33a, 54-33c, 54-33j

STATE OF CONNECTICUT
SUPERIOR COURT

www.jud.ct.gov



Form JD-CR-52 must also be completed

Instructions To Applicant

File the application for the warrant and all affidavits upon which the warrant is based with the clerk of the court for the geographical area within which any person who may be arrested in connection with or subsequent to the execution of the search warrant would be presented, together with the return of the warrant.

Instructions To G.A. Clerk

Upon execution and return of the warrant, affidavits which are the subject of an order dispensing with the requirement of giving a copy to the owner, occupant or person within forty-eight hours shall remain in the custody of the clerk's office in a secure location apart from the remainder of the court file.

Police Case number 21-00349044

TO: A Judge of the Superior Court or a Judge Trial Referee

The undersigned, being duly sworn, complains on oath that the undersigned has probable cause to believe that certain property, to wit:

All evidence related to dog fighting and/or keeping dogs for the purposes of fighting; dogs who are determined to be neglected or subject to cruelty in violation of CGS 53-247; cellular phones; mass data storage devices; computers; laptops; bulk cash; ledgers or records of gambling activity; veterinary medications; scales or other weighing devices; dog training equipment; any item used to agitate a dog; any item used to break a dog's jaw from a bite.

Any dogs seized would be placed in the care and custody of the Connecticut Chief Animal Control Officer, with the assistance of the local animal control officer, for possible action under Chapter 435 of the General Statutes.

- is possessed, controlled, designed or intended for use or which is or has been or may be used as the means of committing the criminal offense of: _____
- was stolen or embezzled from: _____
- constitutes evidence of the following offense or that a particular person participated in the commission of the offense of:
C.G.S. 53-247 - Cruelty to animals/animals engaged in exhibition of fighting
- is in the possession, custody or control of a journalist or news organization, to wit: _____

and such person or organization has committed or is committing the following offense which is related to such property: _____

and such property constitutes contraband or an instrumentality of the criminal offense of: _____

And is within or upon a certain person, place, or thing, to wit:

968 Grassy Hill Road, Orange, CT 06477, a single family residence, including a detached shed/storage structure in the backyard and a non-permanent fenced area in the western edge of the backyard containing several chain link cages.

(This is page 1 of a 11 page Affidavit and Application.)

City/Town	Date	Signature and Title of Affiant
Derby	9/30/21	Det. [Signature] #304
Derby	9-30-21	[Signature] #1179
Jurat	Subscribed and sworn to before me on (Date) 9/30/21	Signed (Judge/Judge Trial Referee) [Signature]

And the facts establishing the grounds for issuing a Search and Seizure Warrant are the following:

1. That Affiant #1, Detective Michael Grabowski is a sworn member of the Connecticut State Police, presently assigned to the Statewide Organized Crime Investigative Task Force (SOCITF) and has over 9 years of law enforcement experience. The Affiant has previously been assigned to both the Western District Major Crime Squad and Central District Major Crime Squad. Affiant #1 has experience investigating violent crimes, including homicides, robberies, and serious assaults, as well as financial crimes, electronic/cyber crimes, sex crimes, and property crimes. Affiant #1 has specialized training and experience with the acquisition and analysis of digital evidence. The knowledge of the facts and circumstances contained hereinafter are the result of the Affiant's personal investigative efforts and observations as well as those of other law enforcement officers, acting in their official capacity, who related their findings to these Affiants.

2. That the Affiant #2, hat, the undersigned affiant, Detective Michael Zella #479 being duly sworn, does depose and state that I am a member of the Connecticut State Police Department and have been a member of said department since November 18th, 2010. I am currently assigned to the Bureau of Special Investigations - Statewide Firearms Trafficking Task Force (SFTTF.) Prior to this assignment, I was assigned to the Eastern District Major Crime Squad (EDMC) - Troop C, Troop K and Van. Before becoming a member of the Connecticut State Police, I was a sworn Police Officer for the town of Montville, CT, for two years. Prior to the date hereof and at all times mentioned herein I was acting as a member of the Connecticut State Police Department. The following set of facts and circumstances are stated from my personal knowledge and observations as well as those of other Troopers acting in their official capacity.

FACTS LEADING TO PROBABLE CAUSE TO SEARCH 968 GRASSY HILL ROAD, ORANGE, CT:

3. On 06/30/2020, the Connecticut State Police Statewide Organized Crime Investigative Task Force (SOCITF) began assisting the Suffolk County (NY) Police Department (SCPD) with an ongoing investigation in a multi-state dog fighting criminal organization.

4. SOCITF initiated a parallel investigation under CFS #21-00266191, which ultimately led a search warrant execution at 109 Britannia Street, Meriden, CT, a property owned by Jose A. Rivera (DOB: 05/21/1979), on 07/31/2021. During the course of that search warrant, a substantial amount of physical evidence was seized that indicated the premises was used for the purpose of dog fighting and/or keeping dogs for the purpose of fighting. Additionally, eight pit bull breed dogs were seized from that property. That investigation is still active.

5. Also on 07/31/2021, contemporaneous to CSP SOCITF executing a search warrant at 109 Britannia Street, Meriden, the Suffolk County Police Department (SCPD) and other New York authorities were executing a series of search warrants and arrest warrants throughout Long Island, NY.

6. In the course of executing those warrants, SCPD arrested one of their primary

(This is page 2 of a 11 page Affidavit and Application.)

City/Town	Date	Signature and Title of Affiant
Derby	9/30/21	<i>[Signature]</i> #304
Derby	9-30-21	<i>[Signature]</i> #479
Jurat	Subscribed and sworn to before me on (Date) 9/30/21	Signed (Judge/Judge Trial Referee) <i>[Signature]</i>

targets in the dog fighting ring, Jeffery Spencer. Subsequent to Spencer's arrest, his cell phone was seized and ultimately a forensic examination of it was conducted by appropriate New York authorities. The examination report contained data depicting previous communications between Spencer and a Connecticut phone number identified as 203-395-6714. Det. Elizabeth Tomlin from SCPD, assigned to the Suffolk County District Attorney's Office, utilized a law enforcement database to establish that the number was associated with Nathaniel Sebastian Martinez of 968 Grassy Hill road, Orange, CT 06477. She observed that the communications contained various videos of dogs, kennels, and roosters. On 08/26/2021, Det. Tomlin contacted me and relayed me the aforementioned information.

7. In addition to the information set forth in paragraph 6, Det. Tomlin also sent me three videos that were recovered from Spencer's phone that were contained in chats with Martinez. I observed the following when watching the videos:

Video 1: Depicted six separate dogs in six different chain link, outdoor kennels. There appeared to be a wooden panel fence immediately behind the kennels. Some of the dogs were additionally chained even while secured inside the kennel. There was a male voice narrating the video, speaking in Spanish. Det. Tomlin relayed to me that the voice sounded like Getulio Vargas Macedo (DOB: 08/04/1975) of 110 Edna Ave, Bridgeport, CT 06610. Macedo is known to both SCPD and CSP investigators as a co-conspirator in the ongoing dog fighting ring and was suspected to have had strong ties to those associated with 109 Britannia Street. Det. Tomlin would be familiar with Macedo's voice because of the investigative techniques utilized by SCPD. It cannot be confirmed that it was in fact Macedo's voice. Additionally, the video was translated by a native Spanish speaking law enforcement official and it is mentioned by the narrator that the he was going to send the video to "Henry" and the last dog is the one that "Henry" likes.

Video 2: A 15 second long video depicting two roosters engaged in a cock fight. One of the roosters appears to attack and peck the second one into a state of immobility or likely death.

Video 3: A 41 second long video depicting an organized cock fight inside of a circular ring with both roosters initially trapped inside of a pen. The pen is then lifted and both roosters engage in a cock fight. One rooster is attacked into a state of immobility or likely death. Individuals can be seen around the ring, observing the cock fight.

8. At the time of this affidavit the original source device that recorded the videos is unknown. It is only known that the videos were exchanged in a chat between Spencer and Martinez and were recovered during a forensic examination of Spencer's cell phone. This establishes that Martinez is communicating with one of SCPD's primary targets about dog fighting and cock fighting and is engaged in the exchange of media depicting such activity.

9. On 08/26/2021, Affiant #1 conducted surveillance in the area of 968 Grassy Hill Road, Orange, CT, after receiving the information from Det. Tomlin. During the course of surveillance, contact was made with the owner and occupants of the

(This is page 3 of a 11 page Affidavit and Application.)

City/Town	Date	Signature and Title of Affiant
Derby	9/30/21	Det. Elizabeth Tomlin #304
Derby	9/30/21	Det. [Signature] #437
Jurat	Subscribed and sworn to before me on (Date) 9/30/21	Signed (Judge/Judge Trial Referee) [Signature]

neighboring property, 970 Grassy Hill Road. Those witnesses stated that they often hear loud barking from multiple dogs coming from the target address. Affiant #1 was able to get a vantage point into the backyard of 968 Grassy Hill Road from the property of 970 Grassy Hill Road (with owner's permission) and did not observe any obvious kennels or equipment consistent with dog fighting. However, a portion of the property was not visible and there were two detached structures (a garage and a shed) also in the backyard that could potentially house animals.

10. On 09/21/2021, Affiant #1 again conducted surveillance in the area of 968 Grassy Hill Road. Again with the permission of the occupants, Affiant #1 walked along the property of 970 Grassy Hill Road. From a different vantage point than utilized on 08/26/2021, Affiant #1 was able to observe an enclosed, fenced structure in the southwest corner of the back yard of 968. The fence surrounding the structure was made of wooden panels. Along the exterior of the fence were disassembled chain link partitions. Affiant #1 immediately recognized these as similar to chain link partitions normally used to assemble, among other uses, a dog kennel. While still standing on the property of 970 Grassy Hill Road, Affiant #1 was able to see through some small portions of fence where the panels had gaps and observed that there were numerous crate/kennel structures inside of it. Portions of the chain link kennels could also be seen above the top of the fence. Affiant #1 heard at least two different dogs bark at separate times and was able to observe the movement of at least two dogs within those kennels. Based on the size of the kennels and the wooden fence surrounding it, it appeared that at least 5-6 kennels were contained within the fence.

11. Affiant #1 again viewed a copy of "Video 1" (see Paragraph 7 above) and recognized that the fence captured in the video (positioned immediately behind the kennels of the six dogs) is identical in style, structure, and size to the fence that I was observing in the back yard of 968 Grassy Hill. Also, the six kennels in Video 1 appear to measure very similarly in length to the kennels that were assembled inside the fenced structure of the video. The fence style is also similar to the fence that encloses the entire property of 968 Grassy Hill. There is a high degree of confidence that the kennel structure Affiant #1 observed on 09/21/2021 is the same as the kennel structure containing the six dogs sent in a video from Martinez to Spencer.

12. During the course of Suffolk County Police Department's investigation, they developed evidence that Getulio Macedo was intending to keep some of his dogs at "Nate's" house. No last name was used. Although it is unknown if Macedo was referring to Nathaniel (NATE) Martinez, it is exceedingly likely given that Martinez eventually shared a video of 6 dogs being held in a structure identified to be on his property and the voice narrating in the background was known to be similar to that of Macedo's.

13. On 09/07/2021, your affiants applied for and were granted a search warrant for historical cell site information for target phone number 203-395-6714 (used by Martinez). That warrant was served the same day and the data responsive to the warrant was produced by Sprint on 09/23/2021.

(This is page 4 of a 11 page Affidavit and Application.)

City/Town	Date	Signature and Title of Affiant
Derby	9/30/21	Det. [Signature] #304
Derby	9-30-21	[Signature] #179
Jurat	Subscribed and sworn to before me on (Date) 9/30/21	Signed (Judge/Judge Trial Referee) [Signature]

14. Upon analyzing the data, your affiants noted that between 05/01/2021 and 09/07/2021 there was a total of approximately 657 phone calls (voice and voice over IP) between Martinez and Macedo. This is further evidence linking Martinez to Macedo, contributing to the likelihood that Macedo may be keeping his dogs at Martinez's house.

15. Also, your affiants noted that between 05/01/2021 and 09/07/2021 there was a total of approximately 22 phone calls (voice and voice over IP) between Martinez and Spencer (one of SCPD's primary targets in the dog fighting ring).

16. Martinez's phone records also show a single phone call with William Ashton (DOB: 04/11/1941), another target of the Suffolk County PD investigation.

DESCRIPTION OF RESIDENCE:

17. 968 Grassy Hill Road, Orange, CT 06477, is a single family residence situated on the western side of Grassy Hill Road, between Skyview Road and Hyland Terrace. The property is surrounded to the north and the west by Grassy Hill Farm, 970 Grassy Hill Road, where Affiant #1 made his surveillance observations from. The property is listed on the Town of Orange's records as being owned by Nathaniel Martinez and Eva Carolin Kennedy. It is a Cape Cod style house and the driveway is positioned to the left of it when viewed from Grassy Hill Road. In the backyard is a detached structure, presumably a shed or barn. Near the very western edge of the backyard is a make-shift structure partially enclosed by a wooden panel fence. That fence surrounds what appears to be several chain link cages. Within those cages is where Affiant #1 observed and heard at least a couple of dogs.

JUSTIFICATION FOR SEIZURE OF DOGS CONTAINED ON THE PROPERTY:

18. Under C.G.S. 53-247(c), "Any person who knowingly (1) owns, possesses, keeps or trains an animal engaged in an exhibition of fighting for amusement or gain, (2) possesses, keeps or trains an animal with the intent that it be engaged in an exhibition of fighting for amusement or gain, (3) permits an act described in subdivision (1) or (2) of this subsection to take place at a premises under his control..." is guilty of that section.

19. In the immediate case, your affiants know that Nathaniel Martinez is keeping dogs at his house in a outdoor, make-shift kennel setting. For the following reasons, probable cause exists that those dogs are being kept in violation of C.G.S. 53-247(c):

a) The multimedia message sent from Nathaniel Martinez to Jeffrey Spencer (recovered on Spencer's phone by New York authorities) that depicted, among other things, six dogs being caged in an outdoor kennel with at least a few further chained within the kennel (referred to in this affidavit as "Video 1"). It is now known by your affiants that the kennel is located on Martinez's property for the reasons set forth *supra*.

b) That Det. Tomlin of SCPD identified the voice in Video 1 as most likely that of Getulio Vargas Macedo, a known perpetrator in the dog fighting ring and target

(This is page 5 of a 11 page Affidavit and Application.)

City/Town	Date	Signature and Title of Affiant
Derby	9/30/21	Det. William Tomlin #304
Derby	9-30-21	Det. [Signature] #479
Jurat	Subscribed and sworn to before me on (Date) 9/30/21	Signed (Judge/Judge Trial Referee) [Signature]

of the SCPD investigation.

c) That evidence exists indicating that Macedo expressed an intent to keep dogs at a "Nate's" house.

d) Extensive communication between Martinez and Macedo as described in this affidavit.

e) It is known that Macedo keeps dogs for the purposes of fighting them.

f) That Martinez, likely housing dogs for Macedo, is permitting an act described in C.G.S. 53-247(c)(1), (2) in violation of C.G.S. 53-247(c)(3).

20. Under C.G.S. 22-329a(a), "The Chief Animal Control Officer, any animal control officer or any municipal or regional animal control officer may take physical custody of any animal when such animal control officer has reasonable cause to believe that such animal is... cruelly treated in violation of section...53-247".

21. The State Animal Control Officer, under the Connecticut Department of Agriculture, and any local animal control officer necessary to provide resources will be assisting in the execution of this search warrant.

22. If such a seizure takes place during the execution of this search warrant, Nathaniel Martinez or any individual asserting him/herself as the owner of the dogs will have sufficient due process as required under 22-329a and the Office of the Attorney General will be notified.

JUSTIFICATION FOR SEIZURE OF OTHER ITEMS LISTED ON THIS SEARCH WARRANT:

23. Your affiants, based on their training and experience, know that wagers are placed on dog fights. Specific to this case, your affiants know that this dog fighting ring is extensive and organized, with participants from several states. The fights are generally pre-arranged with a known location. Specific dogs are chosen to fight and they are weighed in, much like a professional boxing match. Your affiants know that illegal gambling often involves bulk cash and some type of record keeping.

24. The perpetrators of a dog fighting ring will train dogs to fight by increasing their stamina, speed, strength, bite strength, and aggression. For example, during the execution of the search warrant at 109 Britannia Street, Meriden, CT, on 07/31/2021, items such as dog treadmills, collars designed for aggression work, weight vests, and bite ropes were seized.

25. Because dogs sustain injuries in both the training and actual fighting, perpetrators tend to avoid formal veterinary care and will attempt to administer veterinary medications on their own. SCPD has relayed that it is known in this dog fighting ring that there is at least one source who provides veterinary medications.

26. Your affiants know that co-conspirators of a crime will communicate with each other through various means, including cellular phones and electronic messages. Therefore, cellular phones and computers are likely to contain data of evidentiary

(This is page 6 of a 11 page Affidavit and Application.)

City/Town	Date	Signature and Title of Affiant
Derby	9/30/21	Det. [Signature] #304
Derby	9-30-21	Det. [Signature] #179
Jurat	Subscribed and sworn to before me on (Date) 9/30/21	Signed (Judge/Judge Trial Referee) [Signature]

value. It is also known, as described above, that Martinez possesses videos of animal abuse and that such content can reasonably be stored on any mass storage device located within the residence.

CONCLUSION:

27. That based on the preceding information, your affiants believe there is sufficient probable cause for a search and seizure warrant for the property of 968 Grassy Hill Road, Orange, CT 06477, including the specific detached structures described in this affidavit.

28. That a search of this property is likely to contain evidence of 53-247 - Cruelty to animals/animals engaged in the exhibition of fighting.

29. That this affidavit has not been presented before any other judicial authority.

(This is page 7 of a 11 page Affidavit and Application.)

City/Town	Date	Signature and Title of Affiant
Derby	9/30/21	Det. [Signature] #304
Derby	9-30-21	Det. [Signature] #2479
Jurat	Subscribed and sworn to before me on (Date) 9/30/21	Signed (Judge/Judge Trial Referee) [Signature]

The undersigned ("X" one) has not presented this application in any other court or to any other judge or judge trial referee.
 has presented this application in another court or to another judge or judge trial referee (specify):

Wherefore the undersigned requests that a warrant may issue commanding a proper officer to search said person or to enter into or upon said place or thing, search the same, and take into custody all such property.

And to submit the property described in the foregoing affidavit and application to laboratory analysis and examination:

The evidence collected will be submitted to the DESPP Forensic Lab located at 278 Colony Street, Meriden, CT, or submitted to a qualified analyst, or investigator, who is a member of a local, state, or federal law enforcement agency for forensic analysis.

(This is page 8 of a 11 page Affidavit and Application.)

	City/Town	Date	Signature and Title of Affiant
	Derby	9/30/21	Det. [Signature] #304
	Darby	9-30-21	[Signature] #479
Jurat	Subscribed and sworn to before me on (Date) 9/30/21	Signed (Judge/Judge Trial Referee) [Signature]	

**AFFIDAVIT REQUESTING DISPENSATION WITH
REQUIREMENT OF DELIVERY
pursuant to § 54-33c, Connecticut General Statutes**

TO: A Judge of the Superior Court or a Judge Trial Referee

For the reasons set forth below, the undersigned, being duly sworn, requests that the judge / judge trial referee dispense with the requirement of C.G.S. § 54-33c that a copy of the application for the warrant and a copy of any affidavit(s) in support of the warrant be given to the owner, occupant or person named therein with forty-eight hours of the search:

- The personal safety of a confidential informant would be jeopardized by the giving of a copy of the affidavits at such time;
- The search is part of a continuing investigation which would be adversely affected by the giving of a copy of the affidavits at such time;
- The giving of such affidavits at such time would require disclosure of information or material prohibited from being disclosed by chapter 959a of the general statutes;

- In addition, it is requested that the requirement of advance service of this warrant upon the customer whose financial records are being sought, be waived pursuant to C.G.S. § 36a-43 (a);

and the specific details with regard to such reasons are as follows:

The undersigned further requests that this affidavit also be included in such nondelivery.

(This is page 9 of a 11 page Affidavit and Application.)

City/Town	Date	Signature and Title of Affiant
Derby	9/30/21	Det. [Signature] #304
Derby	9-30-21	Det. [Signature] #479
Jurat	Subscribed and sworn to before me on (Date) 9/30/21	Signed (Judge/Judge Trial Referee) [Signature]

SEARCH AND SEIZURE WARRANT

STATE OF CONNECTICUT
SUPERIOR COURT

SEARCH AND SEIZURE WARRANT

The foregoing Affidavit and Application for Search and Seizure Warrant having been presented to and been considered by the undersigned, a Judge of the Superior Court or a Judge Trial Referee, and the foregoing Affidavit having been subscribed and sworn to by the affiant(s) before me at the time it was presented, the undersigned (a) is satisfied therefrom that grounds exist for said application, and (b) finds that said affidavit established grounds and probable cause for the undersigned to issue this Search and Seizure Warrant, such probable cause being the following: From said affidavit, the undersigned finds that there is probable cause for the undersigned to believe that the property described in the foregoing affidavit and application is within or upon the person, if any, named or described in the foregoing affidavit and application, or the place or thing, if any, described in the foregoing affidavit and application, under the conditions and circumstances set forth in the foregoing affidavit and application, and that, therefore, a Search and Seizure warrant should issue for said property.

NOW THEREFORE, by Authority of the State of Connecticut, I hereby command any Police Officer of a regularly organized police department, any State Police Officer, any inspector in the Division of Criminal Justice, or any conservation officer, special conservation officer or patrol officer acting pursuant to C.G.S. § 26-6 to whom these presents shall come within ten days after the date of this warrant to enter into or upon and search the place or thing described in the foregoing affidavit and application, or search the person described in the foregoing affidavit and application or both, to wit:

968 Grassy Hill Road, Orange, CT 06477, a single family residence, including a detached shed/storage structure in the backyard and a non-permanent fenced area in the western edge of the backyard containing several chain link cages.

for the property described in the foregoing affidavit and application, to wit:

All evidence related to dog fighting and/or keeping dogs for the purposes of fighting; dogs who are determined to be neglected or subject to cruelty in violation of CGS 53-247; cellular phones; mass data storage devices; computers; laptops; bulk cash; ledgers or records of gambling activity; veterinary medications; scales or other weighing devices; dog training equipment; any item used to agitate a dog; any item used to break a dog's jaw from a bite.

Any dogs seized would be placed in the care and custody of the Connecticut Chief Animal Control Officer, with the assistance of the local animal control officer, for possible action under Chapter 435 of the General Statutes.

submit the property described in the foregoing affidavit and application to laboratory analysis and examination:

The evidence collected will be submitted to the DESPP Forensic Lab located at 278 Colony Street, Meriden, CT, or submitted to a qualified analyst, or investigator, who is a member of a local, state, or federal law enforcement agency for forensic analysis.

and upon finding said property to seize the same, take and keep it in custody until the further order of the court, and with reasonable promptness make due return of this warrant accompanied by a written inventory of all property seized.

The foregoing request that the judge or judge trial referee dispense with the requirement of C.G.S. § 54-33c that a copy of the warrant application and affidavit(s) in support of the warrant be given to the owner, occupant or person named therein and that the affidavit in support of such request also be included in such nondelivery is hereby:

GRANTED for a period of NOT TO EXCEED 2 WEEKS BEYOND DATE WARRANT IS EXECUTED 10/14/21 (14 days)

This order, or any extension thereof, dispensing with said requirement shall not limit disclosure of such application and affidavits to the attorney for a person arrested in connection with or subsequent to the execution of the search warrant unless, upon motion of the prosecuting authority within two weeks of such arraignment the court finds that the state's interest in continuing nondisclosure substantially outweighs the defendant's right to disclosure.

DENIED.

Service of this Search Warrant upon the customer whose financial records are being sought is hereby waived, pursuant to C.G.S. § 36a-43 (a).

(NOTE: AFFIANT'S OATH MUST BE TAKEN PRIOR TO JUDGE / JUDGE TRIAL REFEREE SIGNING BELOW)

(This is page 10 of a 11 page Affidavit and Application.)

Signed at <u>DELMAR</u> , Connecticut, on: <u>9/30/21</u>	Date	At (Time) <u>9:44</u>	<input checked="" type="checkbox"/> a.m.
Signed (Judge/Judge Trial Referee) <u>[Signature]</u>	Print name of Judicial Officer <u>[Signature]</u>		<input type="checkbox"/> p.m.

**RETURN FOR AND INVENTORY
PROPERTY SEIZED ON SEARCH AND SEIZURE WARRANT**

Judicial District of Ansonia-Milford			G.A. 5	At (Address of Court) 106 Elizabeth Street, Derby, CT 06418	Inventory control number
Docket number CR-			Uniform arrest number	Police case number 21-00349044	Date of seizure
					Companion case number

Then and there by virtue of and pursuant to the authority of the foregoing warrant, I searched the person, place or thing named therein, to wit:

968 Grassy Hill Road, Orange, CT 06477, a single family residence, including a detached shed/storage structure in the backyard and a non-permanent fenced area in the western edge of the backyard containing several chain link cages.

and found thereon or therein, seized, and now hold in custody, the following property:

Total Cash Seized: _____, consisting of

and I gave a copy of such warrant to _____, the owner or occupant of the dwelling, structure, motor vehicle or place designated therein, or to _____, the person named therein, on (Date) _____.

(This is page 11 of a 11 page Affidavit and Application.)

Date	Signed (Officer's signature and department)
------	---

NOTE: Form JD-CR-61, pages 1 - 11 must be supplemented by Form JD-CR-52.

EXHIBIT 2



EXHIBIT 3



EXHIBIT 4



EXHIBIT 5



EXHIBIT 5-A



EXHIBIT 5-B



EXHIBIT 5-C



EXHIBIT 5-D



EXHIBIT 5-E



EXHIBIT 5-F



EXHIBIT 5-G

EXHIBIT 6

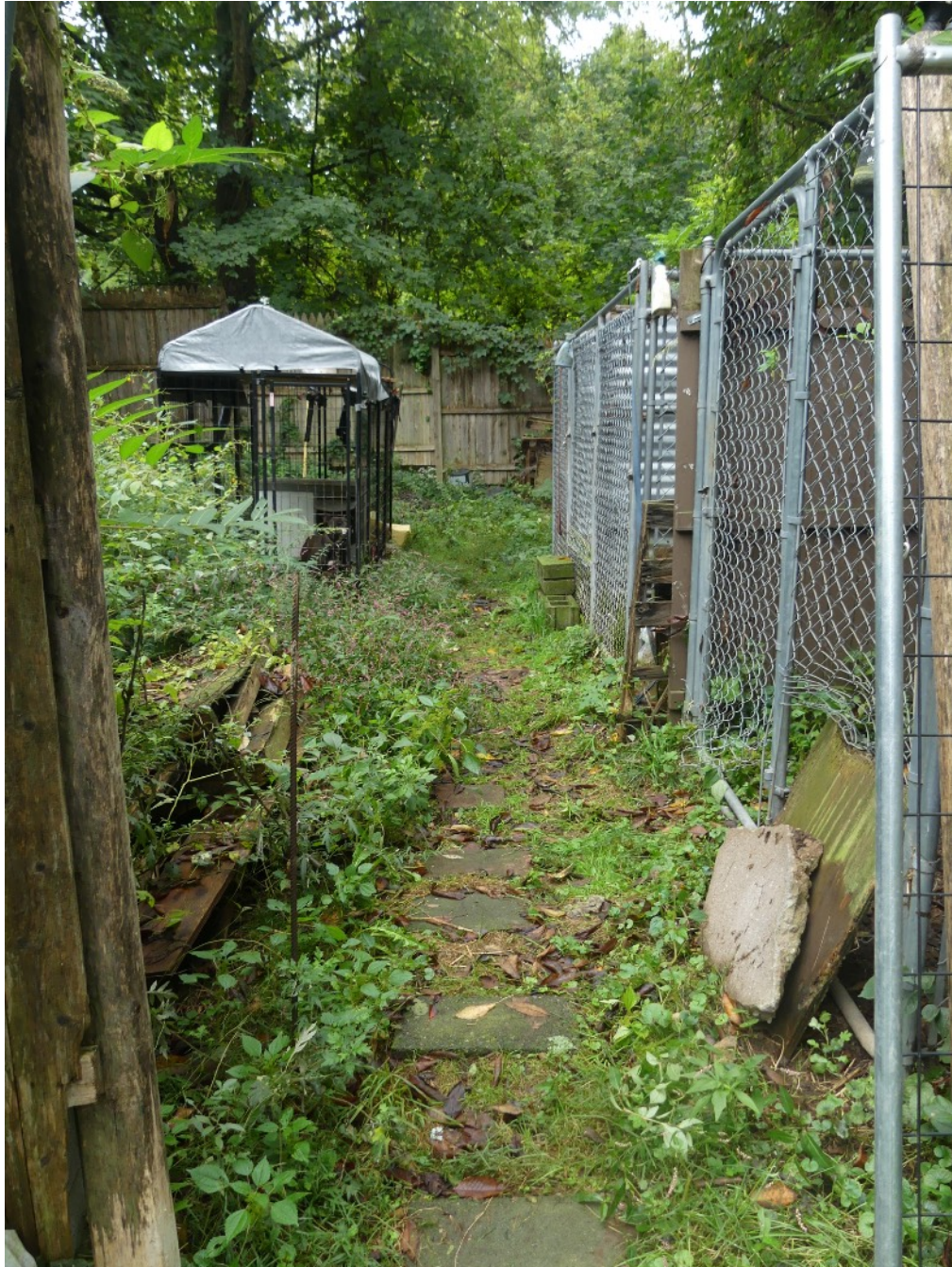


EXHIBIT 6-A



EXHIBIT 6-B



EXHIBIT 6-C

EXHIBIT 7



EXHIBIT 8



EXHIBIT 9



EXHIBIT 9-A



EXHIBIT 9-B

EXHIBIT 10

CFS# 21-00349044

1



EXHIBIT 11



EXHIBIT 11-A

Page		Page		Page	
1	Martinez "Snowman"	21	J Hall's "Nadine"		
1	Martinez + Costas "Candela"	21	Diamond Gangs "Brujo"		
1	Martinez "Skunk"	21			
2	Martinez "Lady Killer"	22	Angel's "Apache"		
2	Martinez "Butch"	22	Angel's "La tuca"		
2	Martinez "Goose"	22	Ozzie's "Betsy"		
3	Martinez "Warden"	23	Ozzie's "Padlock"		
3	Martinez "Jodie"	23	Angels "Panther II"		
3	Martinez "Savage Sammie"	23	DAVID'S "Pookie"		
4	Ken Allen "D&C Tornado"	24	DAVID'S "HOOTIE"		
4	Joe Dalys "Ch. Barrel"	24	DAVID'S "Bashful"		
4	Daly's "Gravedigger"	24	Zenya's "King James"		
5	Castillo's "OZZY"	25	Angel's "Lady Dragon"		
5	Stans "Bubba"	25	Angel's "Bruja"		
5	Dittrers "Kong"	25	Earl Thurman + Jackie		
6	Rebels "Bad Becky"	26	J. Hall "Steady Rock Paul"		
6	M.L.P. "Piranna Red"	26	Martinez's "War Daddy"		
6	Thurmond "Double Shot"	26	STONE'S "Caluja"		
7	Williams "Mookie"	27	Chavis "Ch. Jocko"		
7	Hamiltons "White"	27	Martinez's "Hellson"		
7	S.T.P. "Rotan"	27			
8	Johnson's "G.C.H. Miss Rage"	28	Angels "lil Carnage"		
8	Metro Boys "Deke"	28	Angels "Buddle"		
8	Costa "G.C.H. Onix"	28			
9	Costa's "Ch. Macho"				
9	Boromies "Bashful"				
9	Dr. T. "Ch. China"				
10	Loyd + Huck's "G.C.H. Assassin"				
10	Burton's "Santana"				
10	Thurmonds "Fireman"				
11	Martinez "Bolo"				

EXHIBIT 11-B

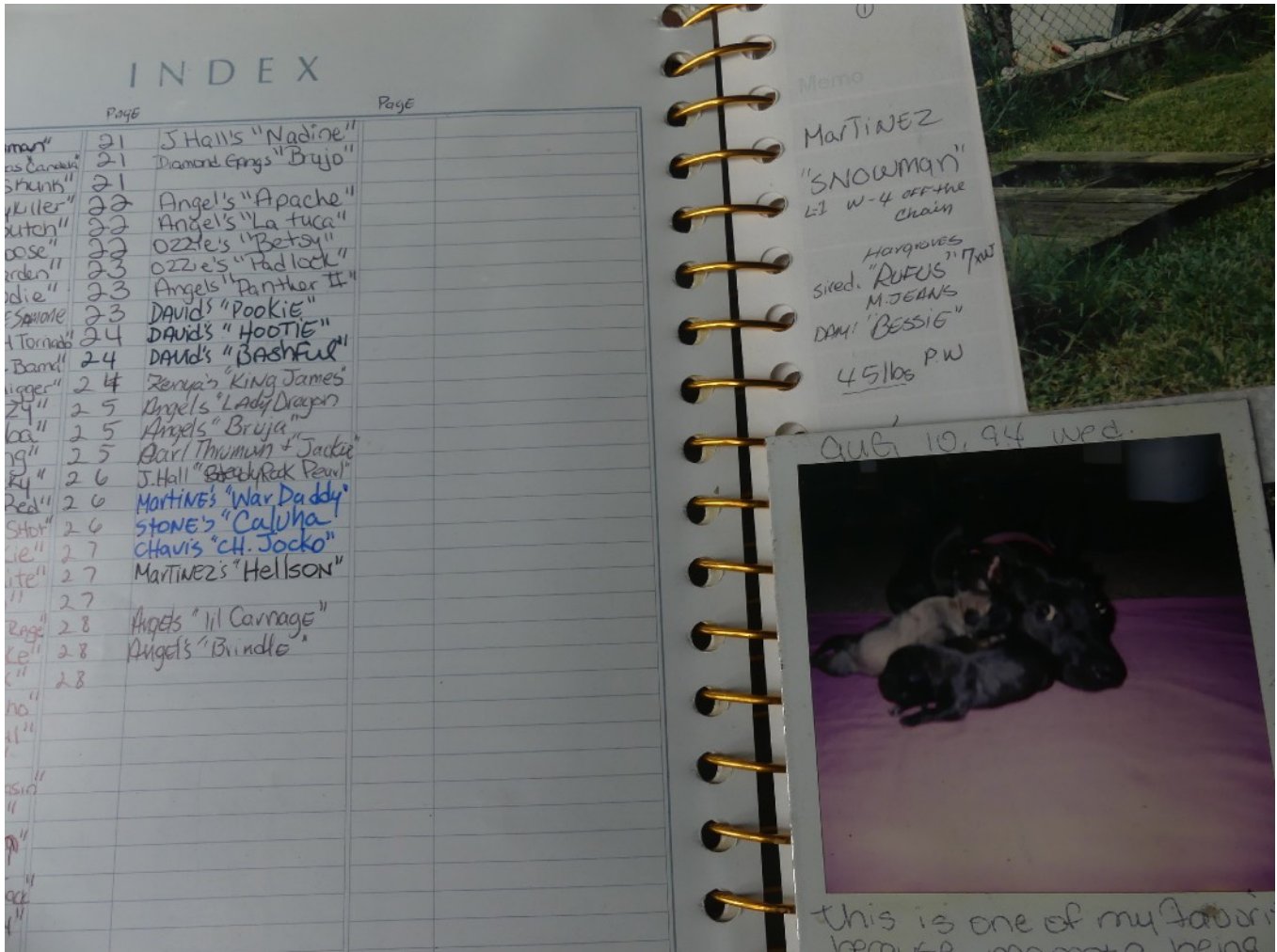


EXHIBIT 11-C

EXHIBIT 12

Memo

MARTINEZ +
castas

"Candela"

2x WINNER OFF
chain

Sired:
Garibaldi ROM.

DAM: a ch.
TUTTE Bred
Bitch.

35 lbs P.W



EXHIBIT 13

FOR MORE INFORMATION CALL:
 DOUG OR KAREN (409) 298-9350
 ROGER OR JO (409) 258-8490

SUMMER 2006

**THE AMERICAN
 GAMEDOG TIMES**
An International Magazine Dedicated to the American Gamedog
 FEBRUARY-MARCH 1991



In this issue:

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**THE AMERICAN
 GAMEDOG TIMES**
An International Magazine Dedicated to the American Gamedog
 JUNE-JULY 1991



SMIG'S CHAMPION BOOGIE MAN

In this issue:

INSIDE FRONT COVER: CHAMPION BOOGIE MAN BY HIS OWNER SMIG	A STORY ABOUT GAMEDOG DEALIN BY DON MAYFIELD.....
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A STORY ABOUT THE GREAT MAURICE CARVER BY GARY HAMMONDS..	PAGE 5
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EXHIBIT 14



EXHIBIT 15

CFS# 21-00349044

3

PUPS

\$225.00 EACH PLUS CRATE AND SHIPPING FEE

SLAT TREADMILLS

5-year all steel, 4x1000 ft. 12" wide with 40 inches running surface. Full metal frame. Price: \$200.00 plus shipping.

Leather 5-way adjustable rick and walking harnesses: \$30.00 each. Long soft padded stand cradles for a photo, full distribution and complete parts list.

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THE
DOG
PHOTO
BOOK

AMERICAN
G TIMES
To the American Gamecocks



INkennels.com



EXHIBIT 16

EXHIBIT 17



EXHIBIT 18



EXHIBIT 18-A

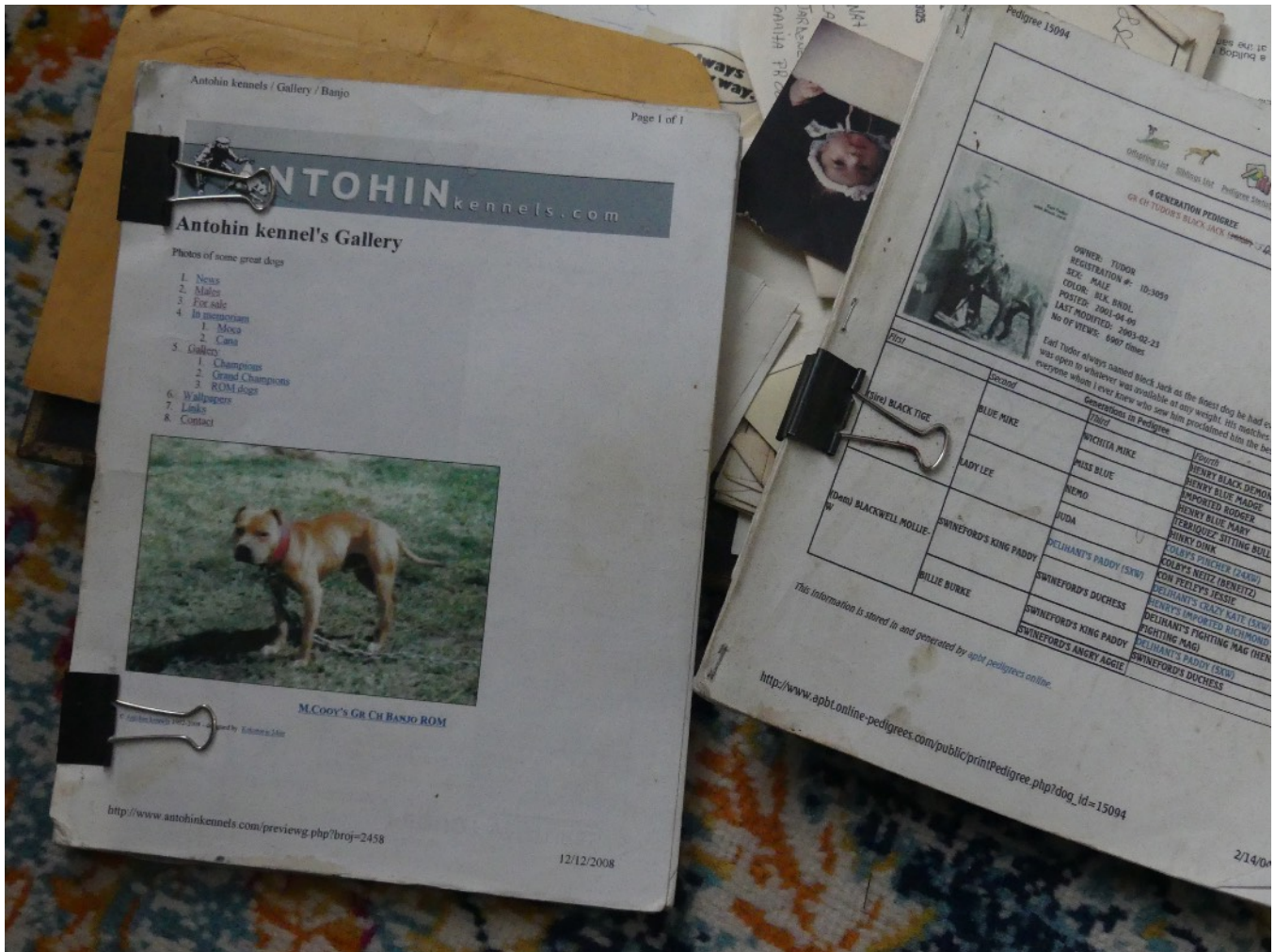


EXHIBIT 18-B

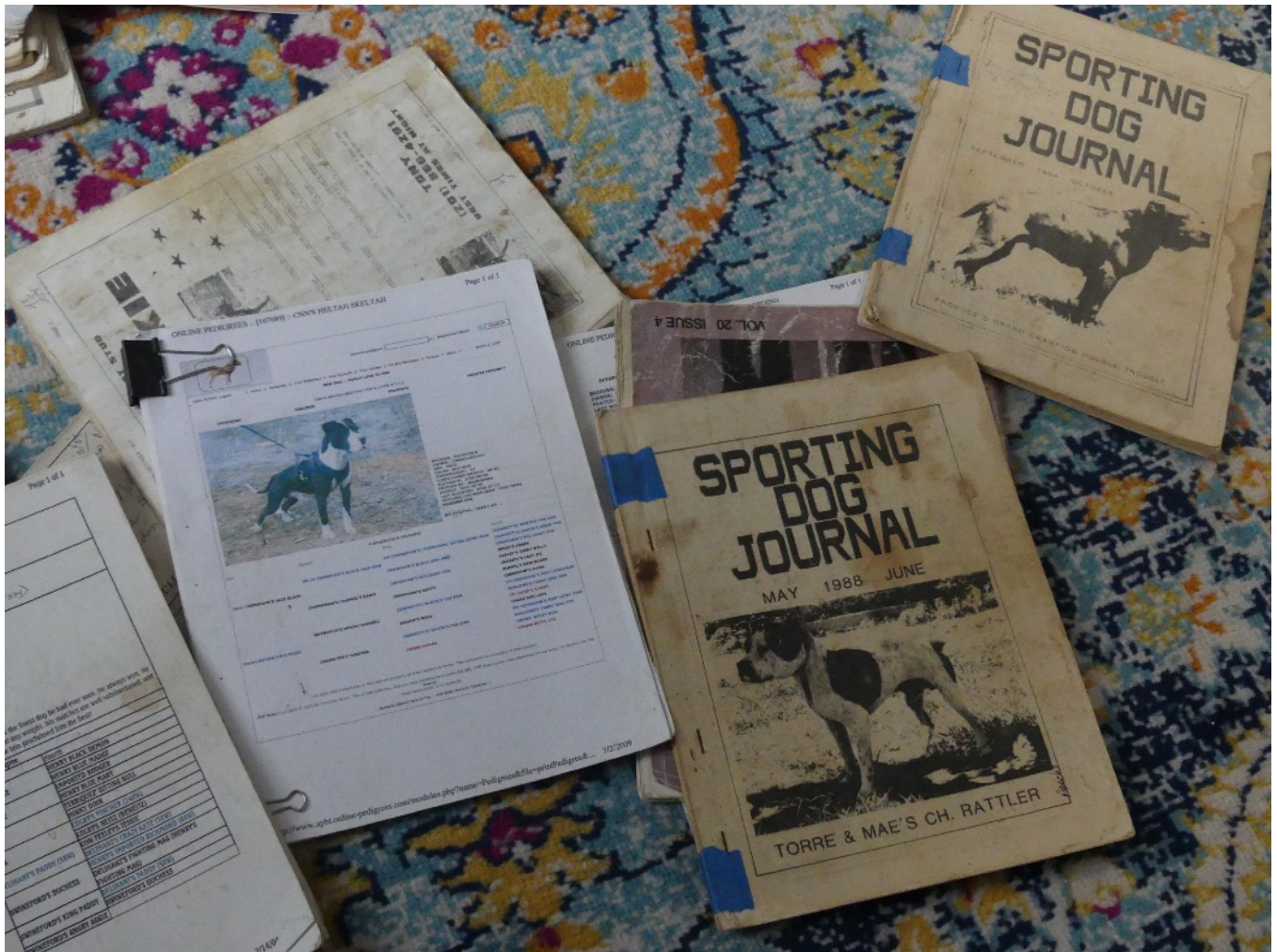


EXHIBIT 18-C

EXHIBIT 19

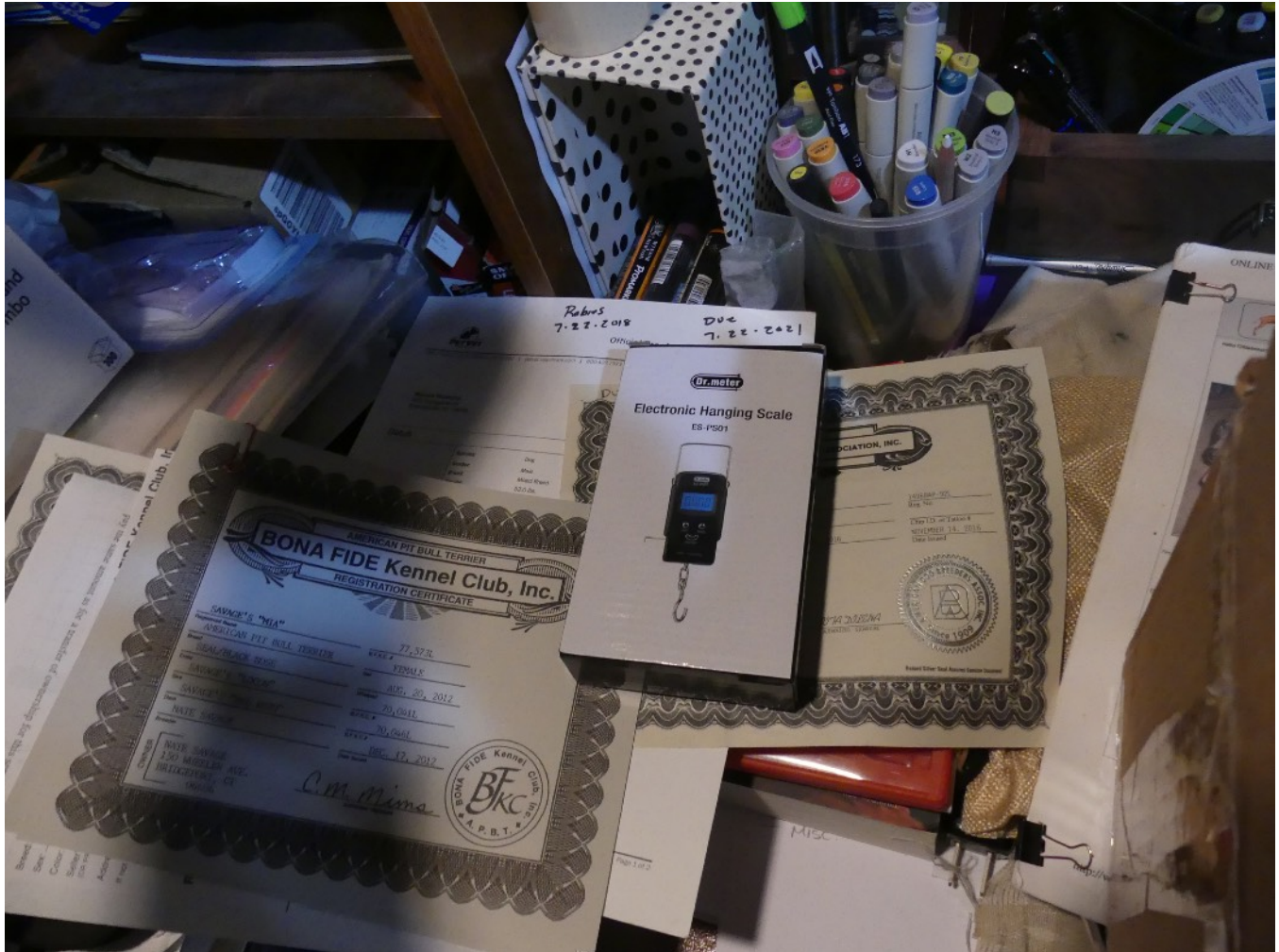


EXHIBIT 19-A

CFS# 21-00349044

5



EXHIBIT 19-B

EXHIBIT 20



EXHIBIT 20-A

W. C. Redmon Co.
Item #7475 Large Pet Scale
Quantity- 1
Made in China
PO #8348



EXHIBIT 20-B

EXHIBIT 21

CFS# Z1-00349044

146

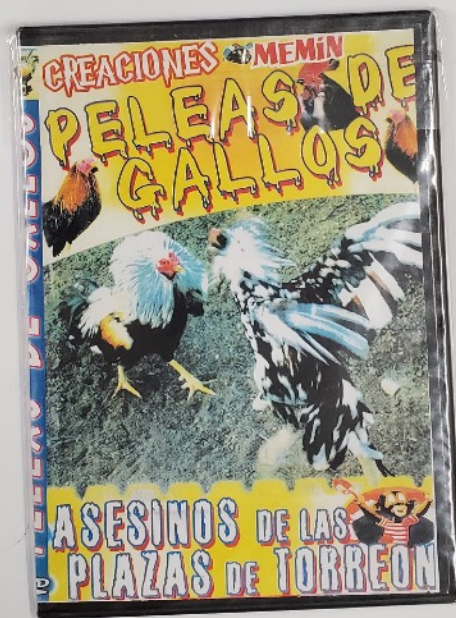


EXHIBIT 22



EXHIBIT 23

CFS# 21-00349044

Strongid Paste
(pyrantel pamoate)
Equine Anthelmintic
For animal use only

Net Weight: 20 mL (23.6 g)
NADA #123-801, Approved by FDA

7

ONE 20 mL (0.7 FL OZ) VIAL
Lutalyse[®] Injection
(clovebutol hydrochloride)
Lutalyse is a 5 mg per mL
solution of clovebutol hydrochloride.
Indications: Pre-anesthetic sedation and muscle relaxation in horses and ponies.
Contraindications: None known.
Warnings: Do not use in pregnant mares or nursing foals.
Caution: Do not use in horses with known hypersensitivity to clovebutol.
Directions: See package insert for complete directions.
Zupreva

McKESSON

Standard Tongue Depressors

NON-STERILE | SINGLE USE | LATEX-FREE

6" 500
INS CM PER BOX

MFR #
24-202

EXHIBIT 24



EXHIBIT 24-A

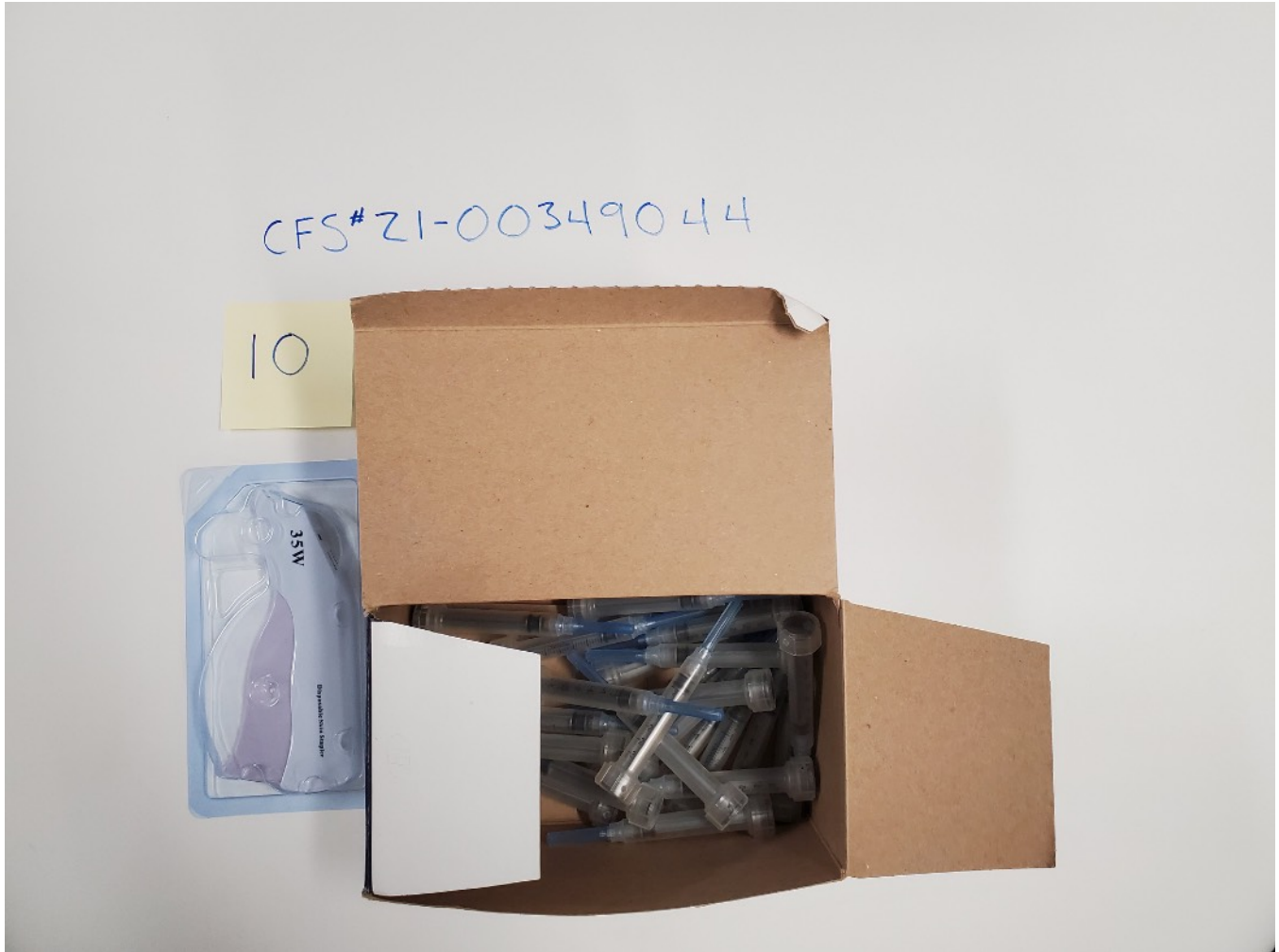


EXHIBIT 24-B

EXHIBIT 25



EXHIBIT 26

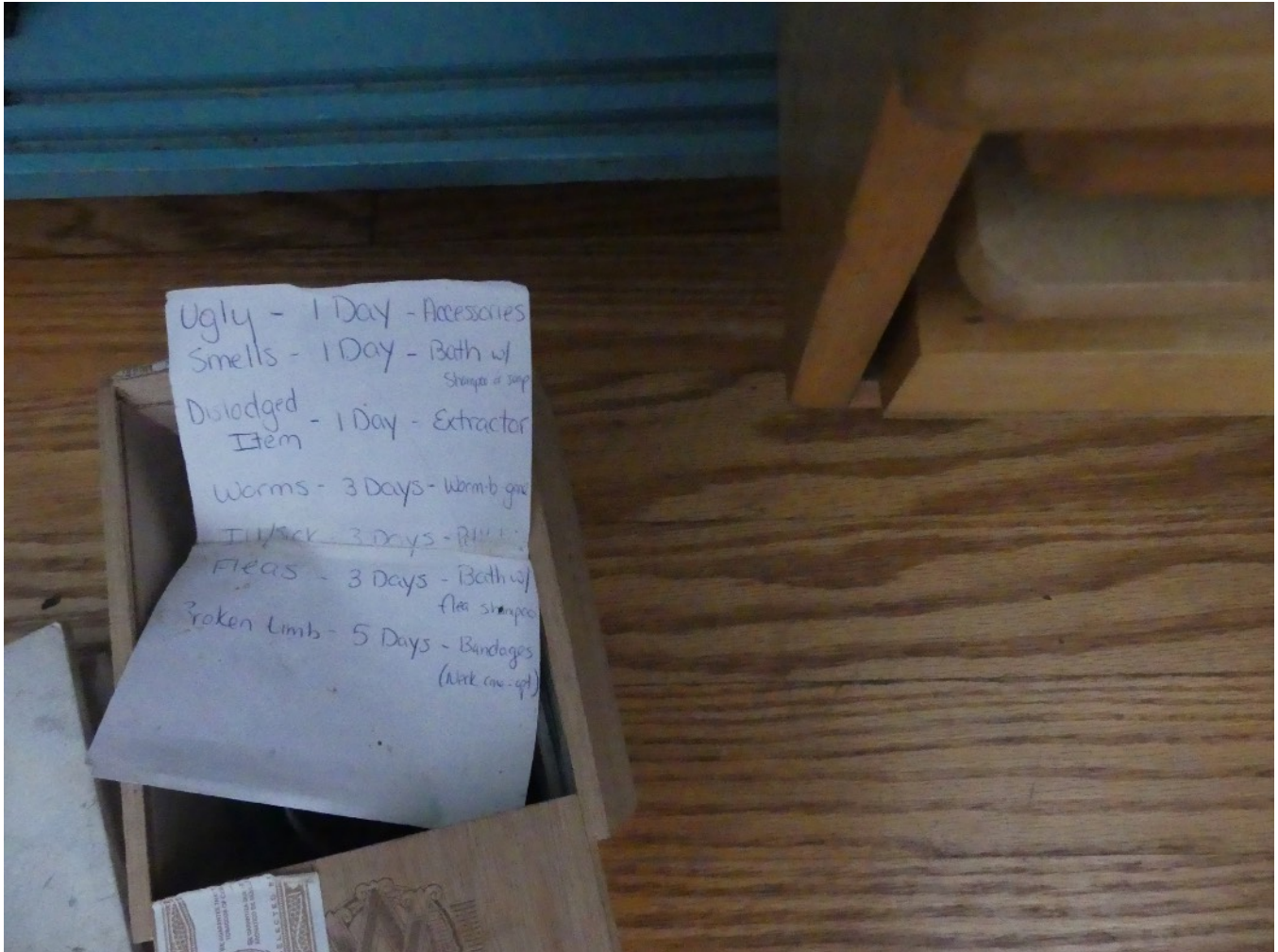


EXHIBIT 26-A

CFS# 21-00349044

8

Smells - 1 Day - Accessories
Dislodged Item - 1 Day - Bath w/ Shampoo or soap
Worms - 3 Days - Extractor
Ill/Sick - 3 Days - PH 4.4
Fleas - 3 Days - Bath w/ flea shampoo
Broken Limb - 5 Days - Bandages (with cast)

2: CKNGZ
8: CKNGZ
11: 2 PLZ
②

EXHIBIT 26-B

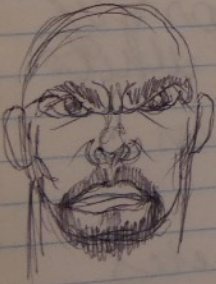
EXHIBIT 27

S* S* K
Studs "sstk"

Patterdale Terriers
game Bred
NOT FOR LOOKS
BUT FOR PERFORMANCE

All pups from proven stock.
price: a matter of conscience

All breedings are planned
years in advance.



My dogs are linebred
from the best of
each litter

EXHIBIT 28



EXHIBIT 29

CFS# 21-00349044

12



EXHIBIT 30



EXHIBIT 31



EXHIBIT 31-A



EXHIBIT 31-B

EXHIBIT 32



EXHIBIT 32-A

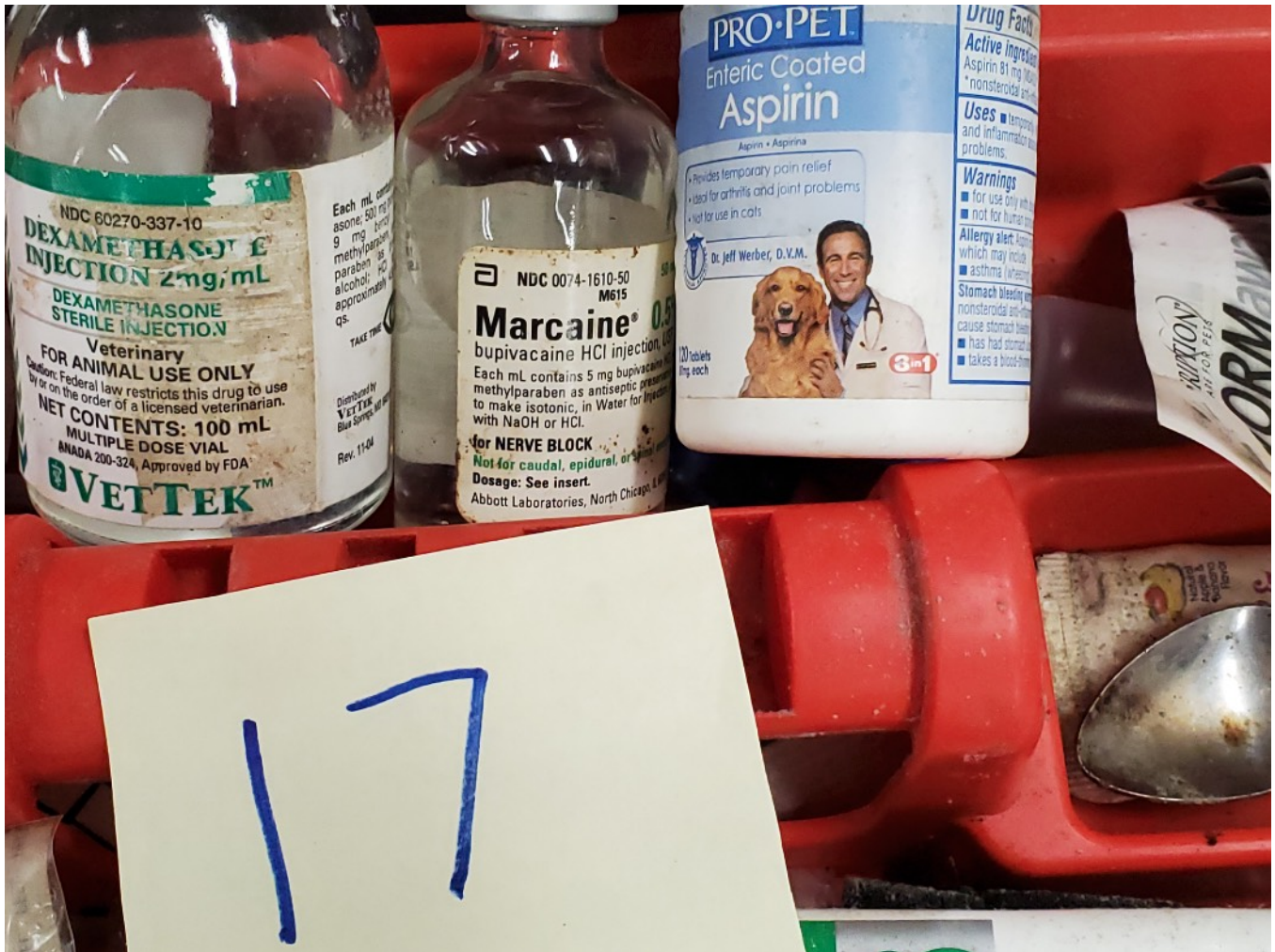


EXHIBIT 32-B

EXHIBIT 33



EXHIBIT 33-A

CFS# Z1-00349044



EXHIBIT 33-B

EXHIBIT 34



EXHIBIT 35



EXHIBIT 35-A

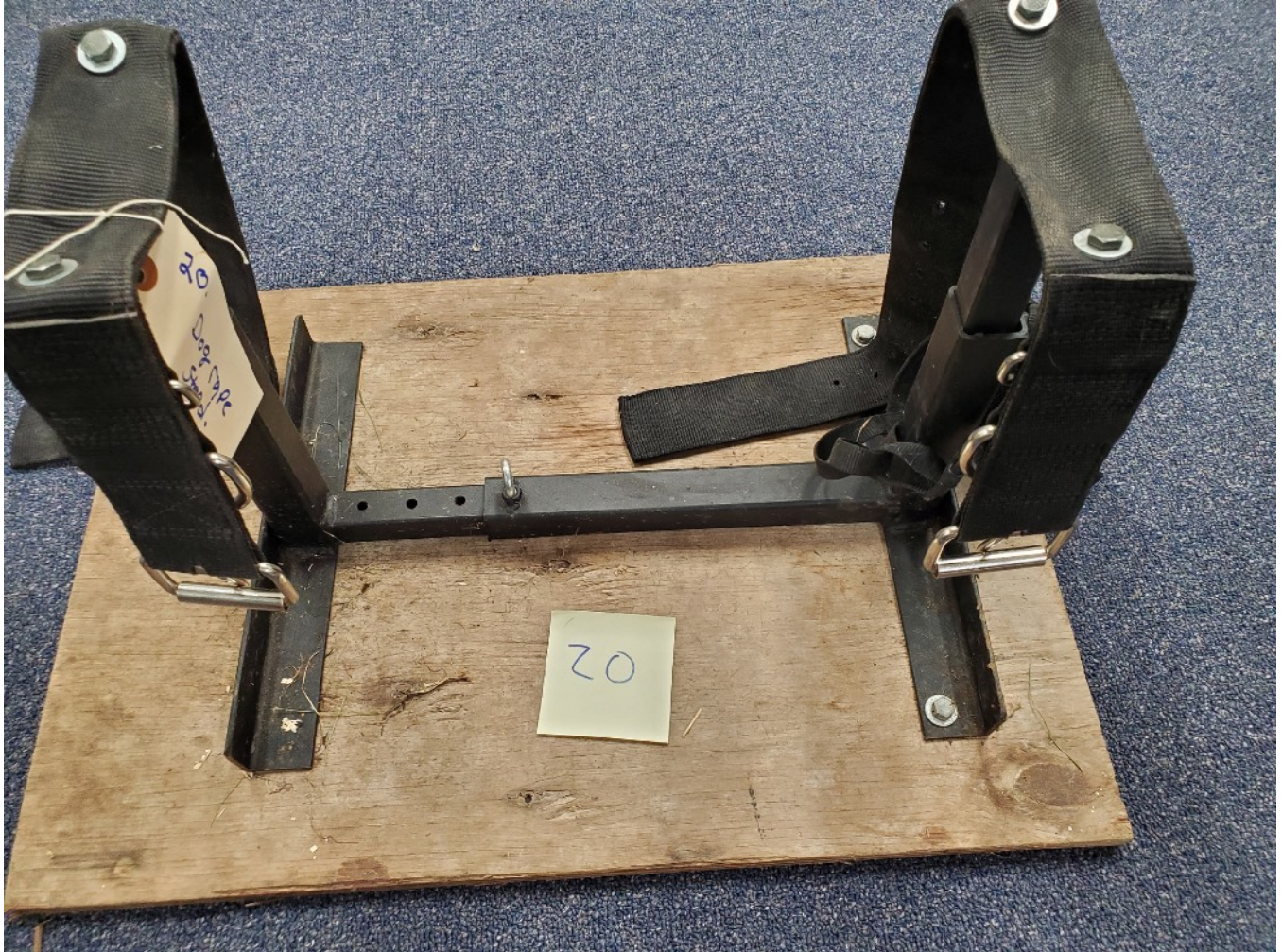


EXHIBIT 35-B

EXHIBIT 36

Veterinary Forensics: Animal Cruelty Investigations

Second Edition

Melinda D. Merck, DVM

Editor

 **WILEY-BLACKWELL**

A John Wiley & Sons, Inc., Publication

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Companion Website

The book is accompanied by a companion website, accessible at

www.wiley.com/go/vetforensics

The website includes forms and checklists to download and use in forensics investigations.

Appendix 31

Dogfighting Terminology

Break stick (breaking stick, bite stick): a wedge-shaped stick used to “break” the hold of a pit bull

Catchweight: a heavyweight, any dog over 52 pounds pit weight

Catmill (Jenny): a conditioning device consisting of one or more spokes projecting from a rotating central shaft in the ground. A dog is harnessed to one spoke or other fixture in front of the dog so that the dog will run in circles, attempting to catch the lure. Weights are frequently attached to ancillary spokes or a drag may be added to increase resistance

Chain weight: the regular weight of a dog kept on the yard

Champion: rank conferred by various pit dog publications on dogs that have won three contract matches

Cur: any dog that is not game; that shows signs and/or gives up or stops; cries, tail between the legs; may initially rear up and soon curr out

Curr out: to quit or give up

Down-dog: the dog receiving the most punishment during a match, usually down on the carpet

Fanged: when a dog inadvertently pierces his or her own lip with a canine tooth while attempting a bite hold on an opponent

Fast-mouthed: in combat, a dog that makes numerous bite holds in rapid succession

Flirtpole: an exercise device consisting of a pole, often bamboo, with a lure (often animal hide) attached; the dog chases the lure, which is guided by the trainer holding the pole

Game (Gameness): 1. The sport of dog-fighting; 2. The combined qualities of courage, aggression, and tenacity in the face of utter exhaustion and possible death.

Game test: to determine a dog’s gameness by rolling until completely exhausted, then having the dog prove gameness by scratching to a fresh dog

Grand Champion: rank that can be conferred on a dog who has won five contract matches without any losses

Handle: the act of handling a dog and lifting him or her away from the opponent

Keep: A rigorous diet and exercise program designed to prepare and condition a dog for a contract match, usually four to six weeks prior to the fight; except for exercise periods, a dog in keep is usually isolated from other dogs

Match: a contracted dogfight

Match dog: a dog that is used or intended for use in a contracted match

Pick-up: occurs when a handler concedes a match by picking up his dog

Pit: arena where fights are conducted; a typical pit is constructed of plywood walls measuring 24 to 36 inches high and approximately 14 to 20 feet square, although concrete, sheets of metal, and bales of hay have been used to construct a pit; the floor of the pit is usually covered with carpet or canvas to allow increased traction; many pits are designed to be disassembled so as to be portable

Pit weight (match weight): when a dog is brought down from his usual weight and is ready to match