

NO. B-CR-77

STATE OF TENNESSEE

VS.

JACKIE MCCONNELL A  
JEFF DOCKERY (COUNTS 6-8 ONLY) B  
JOHN K. MAYS (COUNTS 9-22 ONLY) C

Indictment for

ANIMAL CRUELTY (22 Counts)

Witnesses sworn before the Grand Jury to give evidence on the indictment:

*Julie McMillan*

A TRUE BILL

*Earl Dockery*  
Foreman of the Grand Jury

*3-25-13*  
Date

WITNESSES

Summon for the State by order of  
D. Michael Dunavant, District Attorney General

S.A. Julie McMillan, USDA-OIG, 233 Cumberland Bend, Suite 118, Nashville, TN 37228  
Carolyn Cook, Humane Society of the United States, 2100 L Street NW. Washington, DC 20037

Keeper of Records, Humane Society of the United States, 2100 L Street NW. Washington, DC 20037

Dr. Rachel Cezar, USDA-APHIS Animal Care, 4700 River Road, Riverdale MD 20737

Dr. Clement A. Dussault, USDA-APHIS Animal Care, 4700 River Road, Riverdale MD 20737

Angelika Lingl, DVM, 527 Reads Lake Rd., Chattanooga TN 37415

Dr. Michael P. Rickenbach, FBI Laboratory, 2501 Investigation Parkway, Quantico VA  
22135

Herbert J. Schattenberg III, Manager, Southwest Research Institute, 6220 Culebra Rd, San  
Antonio TX 78228

Dr. Scott VanEtten, CIH – Lab Manager, EMSL Analytical, Inc., 200 Route 130 N.,  
Cinnaminson NJ 08077

John Newton, Senior Materials Scientist, EMSL Analytical, Inc., 200 Route 130 N.,  
Cinnaminson NJ 08077

Glenn Mays, c/o SA Julie McMillan, USDA-OIG 233 Cumberland Bend, Suite 118,  
Nashville TN 37228

S.A. Julie McMillan, Prosecutor

**STATE OF TENNESSEE****FAYETTE COUNTY****CIRCUIT COURT OF FAYETTE COUNTY****MARCH TERM 2013**

**THE GRAND JURORS** of Fayette County, Tennessee, duly empaneled and sworn, upon their oath, present that **JACKIE MCCONNELL**, on or about April 08, 2011, in Fayette County, Tennessee, and before the finding of this indictment, did unlawfully and knowingly torture a walking horse named "Pride's Mr. Williams" by beating "Pride's Mr. Williams" on the head with a large wooden club, in violation of T.C.A. 39-14-202, against the peace and dignity of the State of Tennessee.

**COUNT 2**

And the Grand Jurors on their oath aforesaid further present that in Fayette County on or about April 08, 2011, before the finding of this indictment, the said **JACKIE MCCONNELL**, did unlawfully and knowingly torture a walking horse named "Field Colt" by using a "hot shot" cattle prod on the nose and hind quarters of "Field Colt", in violation of T.C.A. 39-14-202, against the peace and dignity of the State of Tennessee.

**COUNT 3**

And the Grand Jurors on their oath aforesaid further present that in Fayette County on or about April 12, 2011, before the finding of this indictment, the said **JACKIE MCCONNELL**, did unlawfully and knowingly inflict pain on a walking horse named "Pride's Mr. Williams" by applying a chemical compound to the legs of "Pride's Mr. Williams" in order to make the horse sore for the purpose of training the horse to compete in horse shows, in violation of T.C.A. 39-14-202, against the peace and dignity of the State of Tennessee.

**COUNT 4**

And the Grand Jurors on their oath aforesaid further present that in Fayette County on or about April 20, 2011, before the finding of this indictment, the said **JACKIE MCCONNELL**, did unlawfully and knowingly inflict pain on a walking horse named "Mucho Bueno" by applying a chemical compound to the legs of "Mucho Bueno" in order

to make the horse sore for the purpose of training the horse to compete in horse shows, in violation of T.C.A. 39-14-202, against the peace and dignity of the State of Tennessee.

#### COUNT 5

And the Grand Jurors on their oath aforesaid further present that in Fayette County on or about April 29, 2011, before the finding of this indictment, the said **JACKIE MCCONNELL**, did unlawfully and knowingly inflict pain on a walking horse named "Taj Mahal" by applying a chemical compound to the legs of "Taj Mahal" in order to make the horse sore for the purpose of training the horse to compete in horse shows, in violation of T.C.A. 39-14-202, against the peace and dignity of the State of Tennessee.

#### COUNT 6

And the Grand Jurors on their oath aforesaid further present that in Fayette County on or about March 09, 2011, before the finding of this indictment, the said **JACKIE MCCONNELL AND JEFF DOCKERY**, did unlawfully and knowingly inflict pain on a walking horse named "Master Streaker aka M.O.J. Filly" by applying a chemical compound to the legs of "Master Streaker aka M.O.J. Filly" in order to make the horse sore for the purpose of training the horse to compete in horse shows, in violation of T.C.A. 39-14-202, against the peace and dignity of the State of Tennessee.

#### COUNT 7

And the Grand Jurors on their oath aforesaid further present that in Fayette County on or about March 11, 2011, before the finding of this indictment, the said **JACKIE MCCONNELL AND JEFF DOCKERY**, did unlawfully and knowingly inflict pain on a walking horse named "Paroled In The Night" by applying a chemical compound to the legs of "Paroled In The Night" in order to make the horse sore for the purpose of training the horse to compete in horse shows, in violation of T.C.A. 39-14-202, against the peace and dignity of the State of Tennessee.

**COUNT 8**

And the Grand Jurors on their oath aforesaid further present that in Fayette County on or about March 31, 2011, before the finding of this indictment, the said **JACKIE MCCONNELL AND JEFF DOCKERY**, did unlawfully and knowingly inflict pain on a walking horse named "Paroled In The Night" by applying a chemical compound to the legs of "Paroled In The Night" in order to make the horse sore for the purpose of training the horse to compete in horse shows, in violation of T.C.A. 39-14-202, against the peace and dignity of the State of Tennessee.

**COUNT 9**

And the Grand Jurors on their oath aforesaid further present that in Fayette County on or about May 05, 2011, before the finding of this indictment, the said **JACKIE MCCONNELL AND JOHN K. MAYS**, did unlawfully and knowingly inflict pain on a walking horse named "Cash Sweep" by applying a chemical compound to the legs of "Cash Sweep" in order to make the horse sore for the purpose of training the horse to compete in horse shows, in violation of T.C.A. 39-14-202, against the peace and dignity of the State of Tennessee.

**COUNT 10**

And the Grand Jurors on their oath aforesaid further present that in Fayette County on or about May 05, 2011, before the finding of this indictment, the said **JACKIE MCCONNELL AND JOHN K. MAYS**, did unlawfully and knowingly inflict pain on a walking horse named "Pride's Mr. Williams" by applying a chemical compound to the legs of "Pride's Mr. Williams" in order to make the horse sore for the purpose of training the horse to compete in horse shows, in violation of T.C.A. 39-14-202, against the peace and dignity of the State of Tennessee.

**COUNT 11**

And the Grand Jurors on their oath aforesaid further present that in Fayette County on or about April 20, 2011, before the finding of this indictment, the said **JACKIE**

**MCCONNELL AND JOHN K. MAYS**, did unlawfully and knowingly inflict pain on a walking horse named "Paroled In The Night" by applying a chemical compound to the legs of "Paroled In The Night" in order to make the horse sore for the purpose of training the horse to compete in horse shows, in violation of T.C.A. 39-14-202, against the peace and dignity of the State of Tennessee.

**COUNT 12**

And the Grand Jurors on their oath aforesaid further present that in Fayette County on or about April 21, 2011, before the finding of this indictment, the said **JACKIE MCCONNELL AND JOHN K. MAYS**, did unlawfully and knowingly inflict pain on a walking horse named "Paroled In The Night" by applying a chemical compound to the legs of "Paroled In The Night" in order to make the horse sore for the purpose of training the horse to compete in horse shows, in violation of T.C.A. 39-14-202, against the peace and dignity of the State of Tennessee.

**COUNT 13**

And the Grand Jurors on their oath aforesaid further present that in Fayette County on or about April 27, 2011, before the finding of this indictment, the said **JACKIE MCCONNELL AND JOHN K. MAYS**, did unlawfully and knowingly inflict pain on a walking horse named "Paroled In The Night" by applying a chemical compound to the legs of "Paroled In The Night" in order to make the horse sore for the purpose of training the horse to compete in horse shows, in violation of T.C.A. 39-14-202, against the peace and dignity of the State of Tennessee.

**COUNT 14**

And the Grand Jurors on their oath aforesaid further present that in Fayette County on or about April 12, 2011, before the finding of this indictment, the said **JACKIE MCCONNELL AND JOHN K. MAYS**, did unlawfully and knowingly inflict pain on a walking horse named "Master Streaker aka M.O.J. Filly" by applying a chemical compound to the legs of "Master Streaker aka M.O.J. Filly" in order to make the horse

sore for the purpose of training the horse to compete in horse shows, in violation of T.C.A. 39-14-202, against the peace and dignity of the State of Tennessee.

#### COUNT 15

And the Grand Jurors on their oath aforesaid further present that in Fayette County on or about April 20, 2011, before the finding of this indictment, the said **JACKIE MCCONNELL AND JOHN K. MAYS**, did unlawfully and knowingly inflict pain on a walking horse named "Master Streaker aka M.O.J. Filly" by applying a chemical compound to the legs of "Master Streaker aka M.O.J. Filly" in order to make the horse sore for the purpose of training the horse to compete in horse shows, in violation of T.C.A. 39-14-202, against the peace and dignity of the State of Tennessee.

#### COUNT 16

And the Grand Jurors on their oath aforesaid further present that in Fayette County on or about April 21, 2011, before the finding of this indictment, the said **JACKIE MCCONNELL AND JOHN K. MAYS**, did unlawfully and knowingly inflict pain on a walking horse named "Master Streaker aka M.O.J. Filly" by applying a chemical compound to the legs of "Master Streaker aka M.O.J. Filly" in order to make the horse sore for the purpose of training the horse to compete in horse shows, in violation of T.C.A. 39-14-202, against the peace and dignity of the State of Tennessee.

#### COUNT 17

And the Grand Jurors on their oath aforesaid further present that in Fayette County on or about April 27, 2011, before the finding of this indictment, the said **JACKIE MCCONNELL AND JOHN K. MAYS**, did unlawfully and knowingly inflict pain on a walking horse named "Master Streaker aka M.O.J. Filly" by applying a chemical compound to the legs of "Master Streaker aka M.O.J. Filly" in order to make the horse sore for the purpose of training the horse to compete in horse shows, in violation of T.C.A. 39-14-202, against the peace and dignity of the State of Tennessee.

**COUNT 18**

And the Grand Jurors on their oath aforesaid further present that in Fayette County on or about May 04, 2011, before the finding of this indictment, the said **JACKIE MCCONNELL AND JOHN K. MAYS**, did unlawfully and knowingly inflict pain on a walking horse named "Master Streaker aka M.O.J. Filly" by applying a chemical compound to the legs of "Master Streaker aka M.O.J. Filly" in order to make the horse sore for the purpose of training the horse to compete in horse shows, in violation of T.C.A. 39-14-202, against the peace and dignity of the State of Tennessee.

**COUNT 19**

And the Grand Jurors on their oath aforesaid further present that in Fayette County on or about April 20, 2011, before the finding of this indictment, the said **JACKIE MCCONNELL AND JOHN K. MAYS**, did unlawfully and knowingly inflict pain on a walking horse named "Taj Mahal" by applying a chemical compound to the legs of "Taj Mahal" in order to make the horse sore for the purpose of training the horse to compete in horse shows, in violation of T.C.A. 39-14-202, against the peace and dignity of the State of Tennessee.

**COUNT 20**

And the Grand Jurors on their oath aforesaid further present that in Fayette County on or about April 21, 2011, before the finding of this indictment, the said **JACKIE MCCONNELL AND JOHN K. MAYS**, did unlawfully and knowingly inflict pain on a walking horse named "Mucho Bueno" by applying a chemical compound to the legs of "Mucho Bueno" in order to make the horse sore for the purpose of training the horse to compete in horse shows, in violation of T.C.A. 39-14-202, against the peace and dignity of the State of Tennessee.

**COUNT 21**

And the Grand Jurors on their oath aforesaid further present that in Fayette County on or about April 27, 2011, before the finding of this indictment, the said **JACKIE MCCONNELL AND JOHN K. MAYS**, did unlawfully and knowingly inflict pain on a



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**COUNT 22**

And the Grand Jurors on their oath aforesaid further present that in Fayette County on or about April 28, 2011, before the finding of this indictment, the said **JACKIE MCCONNELL AND JOHN K. MAYS**, did unlawfully and knowingly inflict pain on a walking horse named "Mucho Bueno" by applying a chemical compound to the legs of "Mucho Bueno" in order to make the horse sore for the purpose of training the horse to compete in horse shows, in violation of T.C.A. 39-14-202, against the peace and dignity of the State of Tennessee.

  
District Attorney General

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**COUNT 18**

And the Grand Jurors on their oath aforesaid further present that in Fayette County on or about May 04, 2011, before the finding of this indictment, the said **JACKIE MCCONNELL AND JOHN K. MAYS**, did unlawfully and knowingly inflict pain on a walking horse named "Master Streaker aka M.O.J. Filly" by applying a chemical compound to the legs of "Master Streaker aka M.O.J. Filly" in order to make the horse sore for the purpose of training the horse to compete in horse shows, in violation of T.C.A. 39-14-202, against the peace and dignity of the State of Tennessee.

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And the Grand Jurors on their oath aforesaid further present that in Fayette County on or about April 20, 2011, before the finding of this indictment, the said **JACKIE MCCONNELL AND JOHN K. MAYS**, did unlawfully and knowingly inflict pain on a walking horse named "Taj Mahal" by applying a chemical compound to the legs of "Taj Mahal" in order to make the horse sore for the purpose of training the horse to compete in horse shows, in violation of T.C.A. 39-14-202, against the peace and dignity of the State of Tennessee.

**COUNT 20**

And the Grand Jurors on their oath aforesaid further present that in Fayette County on or about April 21, 2011, before the finding of this indictment, the said **JACKIE MCCONNELL AND JOHN K. MAYS**, did unlawfully and knowingly inflict pain on a walking horse named "Mucho Bueno" by applying a chemical compound to the legs of "Mucho Bueno" in order to make the horse sore for the purpose of training the horse to compete in horse shows, in violation of T.C.A. 39-14-202, against the peace and dignity of the State of Tennessee.

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And the Grand Jurors on their oath aforesaid further present that in Fayette County on or about April 27, 2011, before the finding of this indictment, the said **JACKIE MCCONNELL AND JOHN K. MAYS**, did unlawfully and knowingly inflict pain on a

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**COUNT 22**

And the Grand Jurors on their oath aforesaid further present that in Fayette County on or about April 28, 2011, before the finding of this indictment, the said **JACKIE MCCONNELL AND JOHN K. MAYS**, did unlawfully and knowingly inflict pain on a walking horse named "Mucho Bueno" by applying a chemical compound to the legs of "Mucho Bueno" in order to make the horse sore for the purpose of training the horse to compete in horse shows, in violation of T.C.A. 39-14-202, against the peace and dignity of the State of Tennessee.

  
District Attorney General