

**SEALED**

**FILED**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA**

JAN 14 2025

BONNIE HACKLER  
Clerk, U.S. District Court

By \_\_\_\_\_  
Deputy Clerk

**UNITED STATES OF AMERICA,**

*Plaintiff,*

v.

**LESHON EUGENE JOHNSON,**

*Defendant.*

**SEALED**

Case No. **25 CR-12 JFH**

**INDICTMENT**

The Grand Jury charges that:

At all times material to this Indictment:

1. An “animal fighting venture” was “any event, in or affecting interstate or foreign commerce, that involves a fight conducted or to be conducted between at least 2 animals for the purposes of sport, wagering, or entertainment.” 7 U.S.C. § 2156(f)(1).

**BACKGROUND**

**A. Factual Background Regarding Dog Fighting**

2. In the United States, dog fighting ventures involve pit bull-type dogs, which dog fighters prefer for their compact muscular build, short coat, and the aggression that some display toward other dogs.

3. Dog fighters breed, train, and fight dogs with a goal of obtaining “Champion” or “Grand Champion” status for their dogs, which is achieved by winning three or five fights, respectively.

4. Dog fighters selectively breed, sell, and fight dogs that display particular traits.

Some of these traits are: (1) “gameness” or aggressiveness and propensity to fight other dogs; (2) willingness to continue fighting despite suffering trauma or being mortally wounded; and (3) cardiovascular endurance to continue fighting for long periods of time and through fatigue and injury. Dogs displaying these attributes are often bred with other dogs displaying similar characteristics in order to enhance the “bloodline” of these dogs for fighting purposes.

5. Dog fighters often possess multiple dogs in order to increase the prospects of owning a dog who will become a Champion or Grand Champion. Breeders and suppliers play a vital role in dog fighting ventures by maintaining those bloodlines, training fighting dogs, and replenishing inventory as dogs are mortally wounded or killed during fights.

6. Those operating dog fighting ventures often maintain “pedigrees,” books, records, ledgers, and journals relating to the possession, purchase, transportation, sale, breeding, and training of fighting dogs. The pedigree of a fighting dog shows the dog’s name, with reference to the particular dog fighting “kennel,” as well as breeding lineage going back multiple generations, with references to the number of fights won by that dog and its predecessors. Pedigrees are important in the dog fighting “industry” because they allow dog fighters to maintain information on whether a particular bloodline or breeding combination resulted in desired fighting traits.

## **B. The Defendant**

7. Defendant **LESHON EUGENE JOHNSON (“JOHNSON”)** resided in Broken Arrow, Oklahoma. **JOHNSON** ran a dog fighting operation known as “Mal Kant Kennels” in Broken Arrow, Oklahoma, and Haskell, Oklahoma. Prior to establishing “Mal Kant Kennels”, **JOHNSON** ran “Krazyside Kennels” in Oklahoma.

8. **JOHNSON** selectively bred Champion and Grand Champion fighting dogs to produce offspring with fighting traits and abilities desired by him and others.

9. One such dog was “Hogg,” advertised by **JOHNSON** to have won eight dog fights – an unusually high number of wins in the dog fighting industry.

10. **JOHNSON** would market and sell stud rights to “Hogg” and would sell the offspring of “Hogg” and other winning fighting dogs to other dog fighters looking to incorporate the Mal Kant Kennels bloodline into their own operations.

11. By trafficking these fighting dogs to other dog fighters across the country, **JOHNSON** contributed to the growth of the dog fighting industry and profited financially.

12. Search warrants executed at **JOHNSON**’s fighting dog breeding operations in Haskell, Oklahoma, and Broken Arrow, Oklahoma, resulted in the seizure of 190 pit bull-type dogs on October 17, 2024.

**COUNTS ONE THROUGH NINETEEN**

**POSSESSION OF A DOG FOR USE IN AN ANIMAL FIGHTING VENTURE  
[7 U.S.C. § 2156(b) & 18 U.S.C. §§ 49, 2)]**

13. The allegations set forth in paragraphs one through twelve of this Indictment are re-alleged and fully incorporated here by reference.

14. On or about October 17, 2024, in the Eastern District of Oklahoma, the defendant, **LESHON EUGENE JOHNSON**, did knowingly possess a dog for purposes of having the dog participate in an animal fighting venture, specifically the following dogs, seized from his property and placed with an outside caregiver, identified by United States Marshals Service inventory numbers (“USM” numbers):

<b>COUNT</b>	<b>DOGS</b>
One	USM # 1742 through and including USM # 1748 (“Hogg”), and USM # 1749 through and including USM # 1751
Two	USM # 1752 through and including USM # 1761

Three	USM # 1762 through and including USM # 1771
Four	USM # 1772 through and including USM # 1781
Five	USM # 1782 through and including USM # 1791
Six	USM # 1792 through and including USM # 1801
Seven	USM # 1802 through and including USM # 1811
Eight	USM # 1812 through and including USM # 1821
Nine	USM # 1822 through and including USM # 1831
Ten	USM # 1832 through and including USM # 1841
Eleven	USM # 1842 through and including USM # 1851
Twelve	USM # 1852 through and including USM # 1861
Thirteen	USM # 1862 through and including USM # 1871
Fourteen	USM # 1872 through and including USM # 1881
Fifteen	USM # 1882 through and including USM # 1891
Sixteen	USM # 1892 through and including USM # 1901
Seventeen	USM # 1902 through and including USM # 1911
Eighteen	USM # 1912 through and including USM # 1921
Nineteen	USM # 1922 through and including USM # 1931

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

**COUNT TWENTY**

**SALE, TRANSPORT, AND DELIVERY OF A DOG FOR USE IN AN ANIMAL FIGHTING VENTURE**

**[7 U.S.C. § 2156(b) & 18 U.S.C. §§ 49, 2]**

15. The allegations set forth in paragraphs one through twelve of this Indictment are

re-alleged and fully incorporated here by reference.

16. On or about January 6, 2022, in the Eastern District of Oklahoma, the defendant, **LESHON EUGENE JOHNSON**, facilitated by wire and telephone communications, did knowingly sell, transport, and deliver a dog, namely, a dog from the “War Pony / Dirty Mary” litter, to Person A, for purposes of having the dog participate in an animal fighting venture, in violation of Title 7, United States Code, Section 2156(b), and Title 18, United States Code, Sections 49 and 2.

**COUNT TWENTY-ONE**

**POSSESSION OF A DOG FOR USE IN AN ANIMAL FIGHTING VENTURE  
[7 U.S.C. § 2156(b) & 18 U.S.C. §§ 49, 2]**

17. The allegations set forth in paragraphs one through twelve of this Indictment are re-alleged and fully incorporated here by reference.

18. On or about June 3, 2023, in the Eastern District of Oklahoma, the defendant, **LESHON EUGENE JOHNSON**, did knowingly possess a dog, namely “Boot Stomper,” for purposes of having the dog participate in an animal fighting venture, in violation of Title 7, United States Code, Section 2156(b), and Title 18, United States Code, Sections 49 and 2.

**FORFEITURE ALLEGATION**  
**[7 U.S.C. § 2156(e) & 28 U.S.C. § 2461(c)]**

1. The allegations set forth in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture, pursuant to Title 7, United States Code, Section 2156(e); and Title 28, United States Code, Section 2461(c).

2. As a result of committing one or more of the offenses alleged in this Indictment, the Defendant named therein shall forfeit to the United States, pursuant to Title 7, United States Code, Section 2156(e).

Code, Section 2156(e), and Title 28, United States Code, Section 2461(c), any and all animals involved in any violation of Title 7, United States Code, Section 2156.

A TRUE BILL:

CHRISTOPHER J. WILSON  
United States Attorney



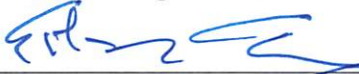
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JORDAN HOWANITZ, TN BA # 035622  
Assistant United States Attorney

Pursuant to the E-Government Act,  
the original indictment has been filed  
under seal in the Clerk's Office.

s / Foreperson  
**FOREPERSON OF THE GRAND JURY**

TODD KIM  
Assistant Attorney General  
Environment and Natural Resources Division  
United States Department of Justice



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