

AOC-315.1 Doc. Code: COM
Rev. 4-01 9/13/2013 11:25:55AM
Commonwealth of Kentucky
Court of Justice
RCr 2.02



Case Number:
County: CAMPBELL
Court: DISTRICT COURT
Warrant Number: E01910001690240
Generated: 9/13/2013 11:25:55AM

Criminal Complaint

COMMONWEALTH OF KENTUCKY
VS.

PLAINTIFF

Name: John P Roth JR
Address (if known): 4566 Winters LN
COLD SPRING, KY41076

DEFENDANT

Complaint

The Affiant, DAVE HALFHILL, states that during 7/29/2013 thru 8/26/2013 in CAMPBELL County, Kentucky, the above named defendant **unlawfully**: committed the offense of Cruelty to Animals 2nd Degree, a Class A Misdemeanor, Four (4) counts.

Campbell County Police received a report of emaciated horses on July 29, 2013. Officers arrived on scene and contacted the Campbell County Animal Shelter. A Veterinarian was then contacted to respond to the location to check on the horses. The Defendant, who is the owner of the horses was contacted and notified of the condition of the horses. On August 26, 2013 the Affiant received a complaint regarding the same horses being neglected Upon arriving on scene, the Affiant observed that all four horses were emaciated and there was no food bucket present The water bucket present was full of dirty water and the stalls were full of feces. The Campbell County Animal Shelter was again contacted to come to the scene and check the horses. The same employee responded, Ashley Stinson, and observed that the horses were in worse condition at this point than they had been during her last exam of them. A notice was left with the owner of the property were the horses were boarded advising of the visit and directing her to contact the animal shelter. On August 27, 2013, due to the severity of the condition of the horses a search warrant was obtained and executed. Ms. Stinson responded to the location to transport the horses. The Co-Defendant, Johnetta Burke, was on scene and advised that she was taking care of the horses the best that she could. The Co-Defendant stated that two of the horses were hers and the Defendant had given her the other two horses with the agreement that she would buy them from him. As of August 27, 2013 the Co-Defendant had not yet purchased the two horses. The Co-Defendant stated that the Defendant was paying her \$8.00 an hour to care for the horses pending the purchase. The Affiant spoke with the Defendant via phone and the Defendant stated to the Affiant that he "didn't give a shit about those horses", that they were his ex-girlfriend's horses. The Defendant also stated that he paid the Co-Defendant to take care of the horses and they are "her responsibility".

Date: September 13, 2013

Signature of Affiant:

Subscribed and sworn to before me by
September, 2013

DAVE HALFHILL

this 13th day of

My commission expires:

2

Circuit Clerk/Notary/Other individual
authorized by the Court

Asst County Clerk