

IN THE CIRCUIT COURT OF THE THIRD
JUDICIAL CIRCUIT OF FLORIDA, IN AND
FOR MADISON COUNTY, FLORIDA.

STATE OF FLORIDA

AGENCY CASE NO.: 12090260

COUNTY OF MADISON

CERTIFIED A TRUE COPY
TIM SANDERS
CLERK CIRCUIT COURT
MADISON COUNTY, FLORIDA

AFFIDAVIT FOR SEARCH WARRANT

By [Signature]
Deputy Clerk

Before me, [Signature], a Judge of the above-captioned Court, personally appeared INVESTIGATOR TINA DEMOTSIS of the MADISON COUNTY SHERIFF'S OFFICE who being first duly sworn by me, deposes and says:

Your affiant has probable cause to believe and does verily believe that in and upon certain buildings and the curtilage thereof, namely, that certain premises in Madison County, Florida, occupied by or under the control of CRAIG A. GRANT and/or NANNETTE ENTRIKEN, being more particularly described and located as follows:

BEGIN AT THE INTERSECTION OF US 90 AND COUNTY ROAD (CR) 255/MAIN STREET. TURN LEFT ONTO CR 255/MAIN STREET AND TRAVEL SOUTH APPROXIMATELY .9 MILES TO SOUTHEAST 85TH AVENUE/SOUTHEAST BENCHMARK DRIVE. TURN RIGHT ONTO SE 85TH AVENUE/SE BENCHMARK DRIVE AND TRAVEL WEST APPROXIMATELY 1.2 MILES AND ARRIVE AT 711 SE 85TH AVENUE/SE BENCHMARK DRIVE, LEE, FLORIDA FOUND ON THE LEFT. THE PROPERTY TO BE SEARCHES INCLUDES 6 PARCELS OF LAND APPROXIMATELY 5 ACRES EACH, PARCEL #15-1S-10-1253-006-000, PARCEL #15-1S-10-1253-007-000, PARCEL #15-1S-10-1253-013-000, PARCEL #15-1S-10-1253-014-000, PARCEL #15-1S-10-1253-015-000, AND PARCEL #15-1S-10-1253-023-000 LOCATED IN LEE, FLORIDA. PLEASE REFER TO THE MADISON COUNTY PROPERTY APPRAISER'S MAP IN THE PACKAGE PROVIDED FOR A DETAILED LAYOUT OF THE PROPERTIES IN QUESTION. THE PARCEL LOCATED AT 711 SE BENCHMARK DRIVE IS PARTICULARLY DESCRIBED AS A TWO LEVEL WOODEN BUILDING, TAN IN COLOR, WITH A BROWN SHINGLED ROOF. THE BUILDING IS LOCATED ON THE SOUTH SIDE OF SE BENCHMARK DRIVE AND FACES TO THE NORTH. THE DOUBLE FRONT DOOR OPENS OUT TO THE NORTH AND TO THE LEFT AND RIGHT; THE DOORS ARE CONSTRUCTED OF PRESS WOOD WITH TAN WOODEN PANELING COVERING THEIR OUTSIDE SURFACES. THERE ARE 2" x 4" WOODEN PLANKS NAILED TO THE OUTSIDE SURFACE OF THE DOORS, CREATING AN X.

And there is now being kept in or on said premises and curtilage thereof, and in any out buildings or vehicles, certain property being described as follows:

1) LIVE OR UNBORN DOMESTICATED ANIMALS; 2) DECEASED ANIMALS, OR REMAINS OF DECEASED ANIMALS BOTH ABOVE AND BELOW GROUND; 3) ANY AND ALL RECORDS IN WRITTEN OR ELECTRONIC FORM PERTAINING TO THE CARE, HOUSING, FEEDING AND TREATMENT OF SAID ANIMALS; 4) ANY AND ALL RECORDS IN WRITTEN OR ELECTRONIC FORM PERTAINING TO THE SOLICITATION, RECEIPT AND/OR USE OF DONATIONS MADE TO CABOODLE RANCH, INC. OR TO CRAIG GRANT; 5) ANY AND ALL FINANCIAL DOCUMENTATION, INCLUDING BUT NOT LIMITED TO, STATEMENTS OF BANK ACCOUNTS, CREDIT OR DEBIT CARDS, CHECKS, CREDIT REPORTS, OR ANY OTHER DOCUMENTATION BEARING OR ASSOCIATED WITH THE NAME CABOODLE RANCH, INC. OR CRAIG GRANT; 6) ALL COMPUTERS, DIGITAL STORAGE DEVICES SUCH AS COMPUTER DISKS, CD ROMS, EXTERNAL DRIVES, CDs, DVDs, JUMP/THUMB DRIVES, CAMERAS, MOBILE PHONES; 7) ANY AND ALL ANIMAL OWNERSHIP RECORDS; 8) ANY AND ALL MEDICATIONS, SUBSTANCES AND SUPPLIES RELATED TO THE HOUSING, CARE, FEEDING AND TREATMENT OF THE ANIMALS CONTAINED THEREIN; 9) ANY AND ALL CAGES, BEDDING, OR OTHER ITEMS USED AS ENCLOSURES OR IN THE HOUSING OF ANIMALS CONTAINED THEREIN; 10) ANY AND ALL FOOD, FOOD RECEPTACLES AND CONTAINERS USED IN THE FEEDING OF THE ANIMALS; 11) ANY AND ALL TOOLS, INSTRUMENTS, OR OTHER ITEMS USED TO MOVE, TRANSPORT OR BURY ANIMALS; 12) FIREARMS OR OTHER INSTRUMENTS USED IN THE DESTRUCTION OR EUTHANIZATION OF ANIMALS; 13) ANY AND ALL PHYSICAL AND TRACE EVIDENCE OF THE CRIMES CURRENTLY BEING INVESTIGATED.

All of which is being kept in violation of the laws of the State of Florida, to-wit: CRUELTY TO ANIMALS, FLORIDA STATUTE 828.12; CONFINEMENT OF ANIMALS WITHOUT SUFFICIENT FOOD OR WATER, FLORIDA STATUTE 828.13; and SCHEME TO DEFRAUD, FLORIDA STATUTE 817.034.

The facts establishing your Affiants' probable cause and the grounds for this application are as follows:

An undercover representative from the organization People for the Ethical Treatment of Animals (PETA) began volunteering on September 6, 2011 at the property in question, later identified as "Caboodle Ranch" (a 501c3 cat sanctuary). Your affiant received information from this volunteer, later identified as CI 1227, reference to felines being neglected at the Caboodle Ranch under the direction of Craig Grant. According to an affidavit prepared by CI 1227, CI 1227 began volunteering at the Caboodle Ranch, Inc. on September 6, 2011 due to the advertisement as a "cat rescue sanctuary." During the hours of 10:30AM to 4:00PM the felines and their areas were documented through photography and video recordings concerning CI 1227's observations. During the time as a

volunteer, a feline named Lily (black and white) was observed with an injury to her right eye. Lily's health began to deteriorate on the 17th of September, 2011 until the demise of Lily on the 31st of January, 2012 while in the custody of Craig Grant. According to CI 1227's sworn statement, Mr. Grant denied Lily veterinary examination and care repeatedly and refused suggestions that Lily receive veterinary care as well as offers by CI 1227 to drive the cat to Madison Veterinary Clinic for treatment. CI 1227 also requested to take custody of Lily to provide her with veterinary care and was refused. See CI 1227's statement and photos attached.

On November 28, 2011, CI 1227 observed the decline in health of a brown in color tabby that Craig Grant advised on December 1, 2011 had succumbed to its injuries. It appeared the feline was denied veterinary care and Mr. Grant ignored repeated expressions of concern for the cat's dire condition. On November 28, 2011, this brown tabby was found by CI 1227 lying on a floor at the ranch. The cat was cold, unresponsive to touch, had green discharge oozing from the nose, and was breathing from the mouth. A request to transport the feline to the Madison Veterinary Clinic was expressed but Grant removed the animal, wiped a Clorox wipe cloth across the cat's nose and near or on its eyes, and refused the offer. Grant advised he had been treating the feline with Clavamox and "doxy" and ignored repeated expressions of concern.

On the 5th of November, 2011, a grey in color feline, "Grey," was observed by CI 1227 with a severely injured right eye in which decline in health began on the same date. Mr. Grant denied veterinary care for this cat for approximately two prior months. On the 12th of December, 2011, Grey's health had not improved, remaining in severe condition. This was brought to Grant's attention but the CI was advised that medication was being placed in the eye even though no prescription could be found. On December 17, 2011 Grant advised the CI to crate Grey out of plain view of visitors to the area. On December 28, 2011, Dr. Lewis of the Madison Veterinary Clinic (MVC) visited the area and advised Grant that removal of the eye was necessary due to the fact an ocular ulcer related to an upper respiratory infection had ruptured. Grey was transported to the MVC on the 29th and was later seen in a kennel with another feline back on the property on December 31, 2011. The other feline was growling and swiping at Grey's face. Grey was allowed to be removed from the kennel but was later seen outside with small insects around the sutured eye. On January 26, 2012, the sutures had been removed but Grey was still showing signs of severe condition.

On December 15, 2011, a white in color feline "Duchess," whose left eye was severely injured was documented by the CI. On December 17, 2011, Duchess, along with several other felines, was placed in the "sick ward trailer" to hide them from visitors and administer Terramycin. On the 29th of December, Duchess was transported to the MVC because the prior owner was expected to visit her at Caboodle on the 31st to reclaim her. She was not reclaimed and had her eye removed. After the removal of the eye, Grant denied the CI's request for

assistance in veterinary care. On the 4th of February, the left eye socket appeared to have been opened, her right eye was partially closed and secreting fluid, and she was housed with other cats in a kennel.

On September 6, 2011, Mr. Grant indicated to CI 1227 that burial was one, if not the only, means by which he disposed of dead cats. After that, the CI found cat skulls in the woods near the "sick ward" as well as another on the grounds. In December, 2011 the CI found the intact remains of a cat on the grounds near the laundry room. Also in December, the CI found a skull, jaw, and longer bone sitting on the ground a short distance from one of the kennels. Another unburied skull was found in the same area. An apparent cat burial site was found near the secluded housing kennels. Garbage bags with drawstrings were found exposed in loose, disturbed dirt. Animal remains were inside at least one of the exposed garbage bags. A skull was also found in a food or water receptacle beside the kennels. A spine that was approximate size of a cat, with some apparent skin still attached was found on undisturbed ground near these same kennels. All of the garbage bags or remains were buried less than 2 feet from the earth's surface.

Madison County Animal Control Officers Jamie Willoughby and Clint Whitfield told this affiant that they made similar observations at the Caboodle Ranch on a number of occasions. See attached statements.


On January 3, 2012, Dr. Dana M. Miller, DVM, visited the Caboodle Ranch to directly observe the care provided to the animals at the facility. During the approximately four hours she spent there, Dr. Miller concluded that the majority (more than 75%) of the approximately 300 animals that she observed were clearly in need of veterinary care due to a host of untreated conditions including upper respiratory infections, eye disease, emaciation, dehydration, skin conditions, untreated wounds, and neurological abnormalities. Dr. Miller observed several cats with serious, even life threatening conditions. She also observed a recently deceased cat in an outdoor area behind the "sick ward" and a scattering of fur and feline bones, including a skull, lower limb bones, a vertebral column, scapulae and tibiae in the vicinity of an area known as the "secluded kennels." According to the report provided regarding Dr. Miller's professional observations, it is her opinion that the Caboodle Ranch continues to fail to provide an acceptable standard of care in order to ensure humane treatment of the animals in its custody. Additionally, Mr. Grant has created a situation where cats regularly become ill as a result of his failure to provide such care. Then Mr. Grant systematically fails to provide the veterinary intervention necessary to alleviate the suffering that he creates both through his actions (actively amassing large numbers of cats) and his inactions (his failure to provide necessary veterinary treatment when animals get sick). This situation, created by Mr. Grant, caused significant suffering of the cats. See attached report of Dr. Miller dated January 18, 2012.

On Caboodle's website, www.caboodleranch.org, donations are actively solicited. The website claims that "all cats have been spayed or neutered, all shots are kept up to date" and regular visits to the vet are kept up for each of the cats. CI 1227 has seen large numbers of checks written to Mr. Grant and Caboodle Ranch from people all over the country come in on a daily basis. As evidenced by the observations of Dr. Miller, CI 1227, Madison County Animal Control Officers, and your affiant, these funds are not being used for the purpose for which they are solicited.

Wherefore, your affiants pray that a search warrant be issued according to law commanding Madison County Sheriff Ben Stewart, or any of his duly constituted agents thereof, with proper and necessary assistance, to search the above described premises and curtilage thereof for the said property heretofore described, and for the seizure and safekeeping thereof, either in the daytime or the nighttime, or on Sunday, as the exigencies of the occasion may demand, in order that the evidence may be procured to be used in the prosecution of such persons unlawfully possessing or using the same in violation of the laws of the State of Florida.


INVESTIGATOR TINA DEMOTSIS, AFFIANT

SWORN TO AND SUBSCRIBED before me this 24 day of February, 2012, by INVESTIGATOR TINA DEMOTSIS, who are personally known to me/produced proper identification.


JUDGE OF THE ABOVE CAPTIONED COURT