

IN THE CIRCUIT COURT FOR BLOUNT COUNTY, TENNESSEE

STATE OF TENNESSEE)

VS.)

LARRY WHEELON)
RANDALL STACY GUNTER)
AND BRANDON LUNSFORD)

NO. C-22317
(New Bill)

FILED
DEC 02 2013
TOM HATCHER
CIRCUIT COURT CLERK

CHARGE: CONSPIRACY TO COMMIT AGGRAVATED CRUELTY TO LIVESTOCK ANIMALS; AGGRAVATED CRUELTY TO LIVESTOCK ANIMALS (12 COUNTS); CRUELTY TO ANIMALS (3 COUNTS)

WITNESSES: KELLIE BACHMAN, BCSPCA

Were sworn during open Court before the Grand Jury to give evidence on the within indictment, this the 2nd day of December, 2013.

William P. Piper
Foreman of the Grand Jury
Kellie Bachman, Prosecutor

A TRUE BILL

William P. Piper
Foreman of the Grand Jury

SUMMONS FOR THE STATE:

Kellie Bachman
Dr. Bart L. Sutherland

By Order Of:

[Signature]
Attorney General

Filed: 12-2-13

COPY

TRUE BILL


CIRCUIT COURT

State of Tennessee, Blount County

shows and similar events, in violation of Tennessee Code Annotated § 39-14-202, against the peace and dignity of the State of Tennessee.

FIFTEENTH COUNT: And the Grand Jurors on their oath aforesaid further present that in Blount County, Tennessee, on or about March 27, 2013 and continuing until on or about April 18, 2013, before the finding of this indictment, the said **LARRY WHEELON, RANDALL STACY GUNTER, AND BRANDON LUNSFORD**, did intentionally or knowingly inflict burns, cuts, lacerations, or other injuries or pain, by any method, including blistering compounds, to the legs or hooves of a walking horse named "Coach Filly," in order to make them sore for any purpose including, but not limited to, competition in horse shows and similar events, in violation of Tennessee Code Annotated § 39-14-202, against the peace and dignity of the State of Tennessee.

SIXTEENTH COUNT: And the Grand Jurors on their oath aforesaid further present that in Blount County, Tennessee, on or about March 27, 2013 and continuing until on or about April 18, 2013, before the finding of this indictment, the said **LARRY WHEELON, RANDALL STACY GUNTER, AND BRANDON LUNSFORD**, did intentionally or knowingly inflict burns, cuts, lacerations, or other injuries or pain, by any method, including blistering compounds, to the legs or hooves of a walking horse named "Neyland," in order to make them sore for any purpose including, but not limited to, competition in horse shows and similar events, in violation of Tennessee Code Annotated § 39-14-202, against the peace and dignity of the State of Tennessee.


Attorney General

TRUE BILL

CIRCUIT COURT

State of Tennessee, Blount County

THE GRAND JURORS of Blount County, Tennessee, duly impaneled and sworn, upon their oath, present that on or about March 27, 2013, and continuing until or about April 18, 2013, in Blount County, Tennessee, and before the finding of this indictment, **LARRY WHEELON, RANDALL STACY GUNTER, AND BRANDON LUNSFORD**, did intentionally or knowingly agree with another that one or more of them would engage in conduct that constitutes the offenses of Aggravated Cruelty to Livestock Animals, Tennessee Code Annotated § 39-14-217, and Cruelty to Animals, Tennessee Code Annotated § 39-14-202, with each having the culpable mental state required for the commission of the offense, and with each acting for the purpose of promoting or facilitating the commission of the offense, and in furtherance of the conspiracy did engage in one or more of the following overt acts:

Did purchase, mix, and/or apply acid or other caustic substance(s) or chemical(s) to any exposed area of walking horses, in a depraved and sadistic manner, without justifiable or lawful purpose, such that the walking horses suffered serious bodily injury; and

Did purchase, mix, and/or apply compounds, including blistering compounds, to inflict burns, cuts, lacerations, or other injuries or pain, by any method, to the legs or hooves of walking horses, in order to make the walking horses sore for any purpose including, but not limited to, competition in horse shows and similar events.

Wherefore, **LARRY WHEELON, RANDALL STACY GUNTER, AND BRANDON LUNSFORD** did conspire to violate Tennessee Code Annotated § 39-14-217, Aggravated Cruelty to Livestock Animals, and did conspire to violate Tennessee Code Annotated § 39-14-202, Cruelty to Animals, in violation of Tennessee Code Annotated § 39-12-103, and against the peace and dignity of the State of Tennessee.


.....
Attorney General

TRUE BILL

CIRCUIT COURT

State of Tennessee, Blount County

SECOND COUNT: And the Grand Jurors on their oath aforesaid further present that in Blount County, Tennessee, on or about March 27, 2013 and continuing until on or about April 18, 2013, before the finding of this indictment, the said **LARRY WHEELON, RANDALL STACY GUNTER, AND BRANDON LUNSFORD** did, in a depraved and sadistic manner and without justifiable or lawful purpose, intentionally apply acid or other caustic substance or chemical to any exposed area of a walking horse named "Los Lobos," resulting in serious bodily injury to the animal, in violation of Tennessee Code Annotated § 39-14-217, against the peace and dignity of the State of Tennessee.

THIRD COUNT: And the Grand Jurors on their oath aforesaid further present that in Blount County, Tennessee, on or about March 27, 2013 and continuing until on or about April 18, 2013, before the finding of this indictment, the said **LARRY WHEELON, RANDALL STACY GUNTER, AND BRANDON LUNSFORD** did, in a depraved and sadistic manner and without justifiable or lawful purpose, intentionally apply acid or other caustic substance or chemical to any exposed area of a walking horse named "Country Bumpkin," resulting in serious bodily injury to the animal, in violation of Tennessee Code Annotated § 39-14-217, against the peace and dignity of the State of Tennessee.

FOURTH COUNT: And the Grand Jurors on their oath aforesaid further present that in Blount County, Tennessee, on or about March 27, 2013 and continuing until on or about April 18, 2013, before the finding of this indictment, the said **LARRY WHEELON, RANDALL STACY GUNTER, AND BRANDON LUNSFORD**, did, in a depraved and sadistic manner



Attorney General

TRUE BILL


CIRCUIT COURT

State of Tennessee, Blount County

and without justifiable or lawful purpose, intentionally apply acid or other caustic substance or chemical to any exposed area of a walking horse named "Fred/Coach's Twisted Play," resulting in serious bodily injury to the animal, in violation of Tennessee Code Annotated § 39-14-217, against the peace and dignity of the State of Tennessee.

FIFTH COUNT: And the Grand Jurors on their oath aforesaid further present that in Blount County, Tennessee, on or about March 27, 2013 and continuing until on or about April 18, 2013, before the finding of this indictment, the said **LARRY WHEELON, RANDALL STACY GUNTER, AND BRANDON LUNSFORD** did, in a depraved and sadistic manner and without justifiable or lawful purpose, intentionally apply acid or other caustic substance or chemical to any exposed area of a walking horse named "Lady Antebellum," resulting in serious bodily injury to the animal, in violation of Tennessee Code Annotated § 39-14-217, against the peace and dignity of the State of Tennessee.

SIXTH COUNT: And the Grand Jurors on their oath aforesaid further present that in Blount County, Tennessee, on or about March 27, 2013 and continuing until on or about April 18, 2013, before the finding of this indictment, the said **LARRY WHEELON, RANDALL STACY GUNTER, AND BRANDON LUNSFORD**, did, in a depraved and sadistic manner and without justifiable or lawful purpose, intentionally apply acid or other caustic substance or chemical to any exposed area of a walking horse named "Ferrell Hugh's Final Score/The Stimulus," resulting in serious bodily injury to the animal, in violation of Tennessee Code Annotated § 39-14-217, against the peace and dignity of the State of Tennessee.


Attorney General

TRUE BILL

CIRCUIT COURT

State of Tennessee, Blount County

SEVENTH COUNT: And the Grand Jurors on their oath aforesaid further present that in Blount County, Tennessee, on or about March 27, 2013 and continuing until on or about April 18, 2013, before the finding of this indictment, the said **LARRY WHEELON, RANDALL STACY GUNTER, AND BRANDON LUNSFORD**, did, in a depraved and sadistic manner and without justifiable or lawful purpose, intentionally apply acid or other caustic substance or chemical to any exposed area of a walking horse named "Night Shade/Black Night by Choice," resulting in serious bodily injury to the animal, in violation of Tennessee Code Annotated § 39-14-217, against the peace and dignity of the State of Tennessee.

EIGHTH COUNT: And the Grand Jurors on their oath aforesaid further present that in Blount County, Tennessee, on or about March 27, 2013 and continuing until on or about April 18, 2013, before the finding of this indictment, the said **LARRY WHEELON, RANDALL STACY GUNTER, AND BRANDON LUNSFORD**, did, in a depraved and sadistic manner and without justifiable or lawful purpose, intentionally apply acid or other caustic substance or chemical to any exposed area of a walking horse named "In My Pocket," resulting in serious bodily injury to the animal, in violation of Tennessee Code Annotated § 39-14-217, against the peace and dignity of the State of Tennessee.

NINTH COUNT: And the Grand Jurors on their oath aforesaid further present that in Blount County, Tennessee, on or about March 27, 2013 and continuing until on or about April 18, 2013, before the finding of this indictment, the said **LARRY WHEELON, RANDALL STACY GUNTER, AND BRANDON LUNSFORD**, did, in a depraved and sadistic manner and without justifiable or lawful purpose, intentionally apply acid or other caustic substance or



Attorney General

TRUE BILL

CIRCUIT COURT

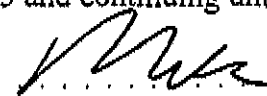
State of Tennessee, Blount County

chemical to any exposed area of a walking horse named "She's Just Sweepin'/She's a Sweeper," resulting in serious bodily injury to the animal, in violation of Tennessee Code Annotated § 39-14-217, against the peace and dignity of the State of Tennessee.

TENTH COUNT: And the Grand Jurors on their oath aforesaid further present that in Blount County, Tennessee, on or about March 27, 2013 and continuing until on or about April 18, 2013, before the finding of this indictment, the said **LARRY WHEELON, RANDALL STACY GUNTER, AND BRANDON LUNSFORD**, did, in a depraved and sadistic manner and without justifiable or lawful purpose, intentionally apply acid or other caustic substance or chemical to any exposed area of a walking horse named "Sweepover," resulting in serious bodily injury to the animal, in violation of Tennessee Code Annotated § 39-14-217, against the peace and dignity of the State of Tennessee.

ELEVENTH COUNT: And the Grand Jurors on their oath aforesaid further present that in Blount County, Tennessee, on or about March 27, 2013 and continuing until on or about April 18, 2013, before the finding of this indictment, the said **LARRY WHEELON, RANDALL STACY GUNTER, AND BRANDON LUNSFORD**, did, in a depraved and sadistic manner and without justifiable or lawful purpose, intentionally apply acid or other caustic substance or chemical to any exposed area of a walking horse named "Shades of Cash/Greg," resulting in serious bodily injury to the animal, in violation of Tennessee Code Annotated § 39-14-217, against the peace and dignity of the State of Tennessee.

TWELFTH COUNT: And the Grand Jurors on their oath aforesaid further present that in Blount County, Tennessee, on or about March 27, 2013 and continuing until on or about April


Attorney General

TRUE BILL


CIRCUIT COURT

State of Tennessee, Blount County

18, 2013, before the finding of this indictment, the said **LARRY WHEELON, RANDALL STACY GUNTER, AND BRANDON LUNSFORD**, did, in a depraved and sadistic manner and without justifiable or lawful purpose, intentionally apply acid or other caustic substance or chemical to any exposed area of a walking horse named "Sweepstakes Pzazz," resulting in serious bodily injury to the animal, in violation of Tennessee Code Annotated § 39-14-217, against the peace and dignity of the State of Tennessee.

THIRTEENTH COUNT: And the Grand Jurors on their oath aforesaid further present that in Blount County, Tennessee, on or about March 27, 2013 and continuing until on or about April 18, 2013, before the finding of this indictment, the said **LARRY WHEELON, RANDALL STACY GUNTER, AND BRANDON LUNSFORD**, did, in a depraved and sadistic manner and without justifiable or lawful purpose, intentionally apply acid or other caustic substance or chemical to any exposed area of a walking horse named "Sweepstakes Mare/Sweep Sister," resulting in serious bodily injury to the animal, in violation of Tennessee Code Annotated § 39-14-217, against the peace and dignity of the State of Tennessee.

FOURTEENTH COUNT: And the Grand Jurors on their oath aforesaid further present that in Blount County, Tennessee, on or about March 27, 2013 and continuing until on or about April 18, 2013, before the finding of this indictment, the said **LARRY WHEELON, RANDALL STACY GUNTER, AND BRANDON LUNSFORD**, did intentionally or knowingly inflict burns, cuts, lacerations, or other injuries or pain, by any method, including blistering compounds, to the legs or hooves of a walking horse named "Sweeping Up the Cash," in order to make them sore for any purpose including, but not limited to, competition in horse


Attorney General