

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
 :
 v. : Crim. No. 17-
 :
 PEDRO CUELLAR : 18 U.S.C. § 371
 :

INFORMATION

The defendant having waived in open court prosecution by Indictment, the Acting United States Attorney for the District of New Jersey charges:

Background

1. At all times relevant to this Information, unless otherwise indicated:
 - a. Defendant PEDRO CUELLAR (hereinafter, “defendant PEDRO CUELLAR”) was a resident of Willow Springs, Illinois.
 - b. Co-conspirator Anthony Gaines, a/k/a/ “Monte” (hereinafter, “Co-conspirator Gaines”) was a resident of Vineland, New Jersey.
 - c. Co-conspirator Frank Nichols (hereinafter, “Co-conspirator Nichols”) was a resident of Millville, New Jersey.

The Conspiracy

2. From in or around October 2015, through in or around November 2015, in Gloucester County, in the District of New Jersey, and elsewhere, the defendant,

PEDRO CUELLAR,

did knowingly and intentionally conspire and agree with Co-conspirator Gaines, Co-conspirator Nichols, and others, to transport, deliver, and receive dogs for

purposes of having the dogs participate in animal fighting ventures, namely, events, in and affecting interstate and foreign commerce, that involved a fight conducted or to be conducted between at least two animals for purposes of sport, wagering and entertainment, contrary to Title 7, United States Code, Section 2156(b), and did an act to effect the object of the conspiracy.

Object of the Conspiracy

3. The object of the conspiracy was for defendant PEDRO CUELLAR, Co-conspirator Gaines, Co-conspirator Nichols, and others, to transport, deliver, and receive dogs for purposes of having the dogs participate in animal fighting ventures.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that Co-conspirator Gaines maintained a supply of pit bull-type dogs intended for use in dog fights, including dogs named “Tommy” and “Sampson,” at or around his residence in Vineland, New Jersey.

5. It was further part of the conspiracy that defendant PEDRO CUELLAR possessed, sold, and traded a supply of pit bull-type dogs intended for use in dog fights, at or around his residence in Willow Springs, Illinois.

6. It was further a part of the conspiracy that Co-conspirator Gaines and Co-conspirator Nichols transported and delivered pit bull-type dogs that were housed by Co-conspirator Gaines, at or around his residence in Vineland, New Jersey, for use in dog fights, to defendant PEDRO CUELLAR in or around Chicago, Illinois.

7. It was further a part of the conspiracy that Co-conspirator Gaines and Co-conspirator Nichols received pit bull-type dogs that were housed by defendant PEDRO CUELLAR, at or around his residence in Willow Springs, Illinois, for use in dog fights, and transported the dogs from in or around Chicago, Illinois to in or around Vineland, New Jersey.

Overt Acts

8. In furtherance of the conspiracy and to effect its unlawful object, the following overt acts, among others, were committed in the District of New Jersey and elsewhere:

a. On or about October 26, 2015, Co-conspirator Gaines asked defendant PEDRO CUELLAR if he would take pit bull-type dogs “Tommy” and “Sampson.”

b. On or about October 26, 2015, defendant PEDRO CUELLAR agreed to receive “Tommy” and “Sampson” from Co-conspirator Gaines.

c. From on or about October 30, 2015, to on or about November 1, 2015, Co-conspirator Gaines and Co-conspirator Nichols drove from in or around Vineland, New Jersey, to in or around Chicago, Illinois, to deliver “Tommy” and “Sampson” to defendant PEDRO CUELLAR.

d. On or about November 1, 2015, defendant PEDRO CUELLAR received “Tommy” and “Sampson” from Co-conspirator Gaines and Co-conspirator Nichols in or around Chicago, Illinois.

e. On or about November 1, 2015, Co-conspirator Gaines and Co-conspirator Nichols received two pit bull-type dogs from defendant PEDRO

CUELLAR in or around Chicago, Illinois, and transported the dogs to in or around Vineland, New Jersey.

All in violation of Title 18, United States Code, Section 371.


WILLIAM E. FITZPATRICK
ACTING UNITED STATES ATTORNEY

CASE NUMBER: 17-

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v.

PEDRO CUELLAR

INFORMATION FOR

18 U.S.C § 371

WILLIAM E. FITZPATRICK

ACTING UNITED STATES ATTORNEY
NEWARK, NEW JERSEY

KATHLEEN P. O'LEARY

ASSISTANT U.S. ATTORNEY
(973) 645-2841

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(Ed. 1/97)