

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No.
	:	
ANTHONY GAINES,	:	7 U.S.C. § 2156(b)
a/k/a "Monte"	:	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:

Count One

(Conspiracy to Transport, Deliver, Buy, Sell, Possess, and Receive a Dog for Purposes of Having the Dog Participate in an Animal Fighting Venture)

Background

1. At all times relevant to this Information, unless otherwise indicated:
 - a. Defendant ANTHONY GAINES, a/k/a "Monte," was a resident of Vineland, New Jersey.
 - b. Co-conspirator Justin Love (hereinafter, "Co-conspirator Love") was a resident of Glassboro, New Jersey.
 - c. Co-conspirator Robert Arellano (hereinafter, "Co-conspirator Arellano") was a resident of Albuquerque, New Mexico.

2. From on or about December 16, 2014, through in or around November 2015, in Gloucester, Cumberland, and Essex Counties, in the District of New Jersey, and elsewhere, the defendant,

ANTHONY GAINES,
a/k/a "Monte,"

did knowingly and intentionally conspire and agree with Co-conspirator Love, Co-conspirator Arellano, and others, to transport, deliver, buy, sell, possess, and receive a dog for purposes of having the dog participate in an animal fighting venture, namely, an event, in and affecting interstate and foreign commerce, that involved a fight conducted or to be conducted between at least 2 animals for purposes of sport, wagering and entertainment, contrary to Title 7, United States Code, Section 2156(b).

Object of the Conspiracy

3. The object of the conspiracy was for defendant ANTHONY GAINES, Co-conspirator Love, Co-conspirator Arellano, and others, to transport, buy, sell, possess, deliver, and receive a dog for purposes of having the dog participate in an animal fighting venture.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that defendant ANTHONY GAINES, Co-conspirator Love, Co-conspirator Arellano, and others, fought pit-bull type dogs in dog fights, including "rolls," which were fights staged between dogs for the purpose of determining the dogs' propensity for fighting.

5. It was further part of the conspiracy that Co-conspirator Arellano maintained a supply of pit-bull type dogs for use in dog fights at or around his residence in Albuquerque, New Mexico.

6. It was further part of the conspiracy that defendant ANTHONY GAINES and Co-conspirator Arellano communicated about exhibiting dogs they owned in dog fights.

7. It was further part of the conspiracy that Co-conspirator Arellano bred, sold, and shipped pit-bull type dogs from fighting dog bloodlines to customers interstate, knowing that the dogs would be used in dog fights.

8. It was further part of the conspiracy that Co-conspirator Arellano sold and shipped interstate pit-bull type dogs for use in dog fights, including a dog later named "Vida" by defendant ANTHONY GAINES, to defendant ANTHONY GAINES and Co-conspirator Love.

Overt Acts

9. 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 December 16, 2014, defendant ANTHONY GAINES purchased from Co-conspirator Arellano a pit-bull type dog whom defendant ANTHONY GAINES later named "Vida," for purposes of using "Vida" in dog fights.

b. On or about December 16, 2014, Co-conspirator Robert Arellano sold "Vida" to defendant ANTHONY GAINES, knowing that the dog would be used in dog fights.

c. On or about December 16, 2014, Co-conspirator Robert Arellano shipped two pit-bull type dogs, one of whom was "Vida," via air cargo from Albuquerque, New Mexico, to defendant ANTHONY GAINES and Co-conspirator Love, at Newark Liberty International Airport.

d. From on or about December 16, 2014, to on or about November 17, 2015, defendant ANTHONY GAINES housed "Vida," for use in dog fights at or around his residence in Vineland, New Jersey.

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

Count Two
**(Conspiracy to Transport, Deliver, Possess, and Receive a Dog for
Purposes of Having the Dog Participate in an Animal Fighting Venture)**

1. The allegations set forth in Paragraphs 1, and 3 through 9, of Count One is hereby realleged as if fully set forth herein:

2. At all times relevant to this Count of the Information:

a. Co-conspirator Frank Nichols (hereinafter, "Co-conspirator Frank Nichols") was a resident of Millville, New Jersey.

b. Co-conspirator Dajwan Ware (hereinafter, "Co-conspirator Dajwan Ware") was a resident of Fort Wayne, Indiana.

3. From in or around October 2015, through in or around November 2015, in Cumberland and Gloucester Counties, in the District of New Jersey, and elsewhere, the defendant,

ANTHONY GAINES,
a/k/a "Monte,"

did knowingly and intentionally conspire and agree with Co-conspirator Frank Nichols and Co-conspirator Dajwan Ware, and others, to transport, deliver, possess, and receive a dog for purposes of having the dog participate in an animal fighting venture, namely, an event, in and affecting interstate and foreign commerce, that involved a fight conducted or to be conducted between at least 2 animals for purposes of sport, wagering and entertainment, contrary to Title 7, United States Code, Section 2156(b).

Object of the Conspiracy

4. The object of the conspiracy was for defendant ANTHONY GAINES, Co-conspirator Frank Nichols, Co-conspirator Dajwan Ware, and others, to

transport, deliver, possess, and receive a dog for purposes of having the dog participate in an animal fighting venture.

Manner and Means of the Conspiracy

5. It was part of the conspiracy that defendant ANTHONY GAINES, Co-conspirator Frank Nichols, Co-conspirator Dajwan Ware, and others, fought pit-bull type dogs in dog fights, including “rolls,” which were fights staged between dogs for the purpose of determining the dogs’ propensity for fighting.

6. It was further part of the conspiracy that defendant ANTHONY GAINES maintained pit-bull type dogs for use in dog fights, including a dog named “Bubbles,” at or around his residence, in Vineland, New Jersey.

7. It was further part of the conspiracy that defendant ANTHONY GAINES and Co-conspirator Dajwan Ware discussed exhibiting “Bubbles,” and other dogs they owned, in dog fights.

8. It was further part of the conspiracy that defendant ANTHONY GAINES and Co-conspirator Frank Nichols transported and delivered “Bubbles,” from in or around Vineland, New Jersey, to Co-conspirator Dajwan Ware at or around his residence in Fort Wayne, Indiana.

9. It was further part of the conspiracy that defendant ANTHONY GAINES and Co-conspirator Dajwan Ware communicated about training “Bubbles” for dog fighting while “Bubbles” was in Co-conspirator Dajwan Ware’s custody and control.

Overt Acts

10. 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 7, 2015, defendant ANTHONY GAINES and Co-conspirator Dajwan Ware discussed engaging “Bubbles” in a dog fight against the dog of an individual located in or around Chicago, Illinois.

b. On or about October 10, 2015, defendant ANTHONY GAINES and Co-conspirator Frank Nichols discussed engaging “Bubbles,” and a dog owned or possessed by Co-conspirator Frank Nichols, in a “two-card” dog fight involving the individual referenced in Paragraph 10a.

c. On or about October 27, 2015, defendant ANTHONY GAINES asked Co-conspirator Frank Nichols if Co-conspirator Frank Nichols would help transport and deliver “Bubbles” to Co-conspirator Dajwan Ware in or around Co-conspirator Dajwan Ware’s residence in Fort Wayne, Indiana, and Co-conspirator Frank Nichols agreed to do so.

d. Between on or about October 30, 2015, and on or about October 31, 2015, defendant ANTHONY GAINES and Co-conspirator Frank Nichols drove to in or around Co-conspirator Dajwan Ware’s residence in Fort Wayne, Indiana, to deliver “Bubbles” to Co-conspirator Dajwan Ware.

e. On or about October 31, 2015, Co-conspirator Dajwan Ware received “Bubbles” from Co-conspirator Frank Nichols and defendant ANTHONY

GAINES in or around Co-conspirator Dajwan Ware's residence in Fort Wayne, Indiana.

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

Count Three
**(Possession of a Dog for Purposes of Having the Dog
Participate in An Animal Fighting Venture)**

1. The allegations set forth in Paragraphs 1, and 3 through 9, of Count One are hereby realleged as if fully set forth herein:

2. From on or about October 1, 2015, through on or about November 17, 2015, in Gloucester County, in the District of New Jersey, and elsewhere, the defendant,

ANTHONY GAINES,
a/k/a "Monte,"

knowingly possessed a dog, namely "Vida," for purposes of having the dog participate in an animal fighting venture, namely, an event, in and affecting interstate commerce, that involved a fight conducted and to be conducted between at least 2 animals for purposes of sport, wagering, and entertainment.

In violation of Title 7, United States Code, Section 2156(b), and Title 18, United States Code, Section 49.


WILLIAM E. FITZPATRICK
ACTING UNITED STATES ATTORNEY

CASE NUMBER: 17-

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

**ANTHONY GAINES,
a/k/a "Monte"**

INFORMATION FOR

7 U.S.C. §§ 2156(b)
18 U.S.C § 371

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