

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA

v.

ANTONIO CASILLAS MONTERO  
(A/K/A STONE CITY KENNEL),  
Defendant.

Criminal No. 22-cr-437-SCC

UNITED STATES' MOTION FOR DETENTION PENDING TRIAL

The Government respectfully submits that defendant Antonio Casillas Montero poses an extreme risk of flight; that he will not be able to rebut the statutory presumption that no condition or combination of conditions will reasonably assure the appearance of the defendant as required, 18 U.S.C.

§ 3142(e)(3)(E); and that the Court should therefore order him detained pending trial.

**Legal Background**

Under the Bail Reform Act, 18 U.S.C. §§ 3141 *et seq.*, federal courts can order a defendant's detention pending trial upon a determination that the defendant is either a danger to the community or a risk of flight. 18 U.S.C. § 3142(e). A court's finding that a defendant poses a risk of flight must be supported by a preponderance of the evidence. *See, e.g., United States v. Iglesias-Benitez*, 974 F.2d 1329, at \*3 (1st Cir. 1992) (unpublished); *United States v. Valentin-Rosa*, 740 F. Supp. 2d 289, 291 (D.P.R. 2010).

In evaluating whether there are conditions of release that will reasonably assure the appearance of the defendant, the Court must take into account the following: (1) the nature and circumstances of the crimes charged; (2) the weight of the evidence against the person; (3) the history and characteristics of the defendant, including the person's "character . . . [and] financial

resources”; and (4) the seriousness of the danger posed by the defendant’s release. 18 U.S.C. § 3142(g).

Evidentiary rules do not apply at detention hearings, and the Government is entitled to present evidence by way of proffer. *See* 18 U.S.C. § 3142(f)(2) (“The rules concerning admissibility of evidence in criminal trials do not apply to the presentation and consideration of information at the hearing.”); *United States v. Femia*, 983 F.2d 1046 (1st Cir. 1993) (“[Defendant’s] objection that a judicial officer may not order detention on the basis of a mere proffer of evidence by the government is simply not correct.”); *United States v. LaFontaine*, 210 F.3d 125, 130-31 (2d Cir. 2000) (“proffers are permissible both in the bail determination and bail revocation contexts”).

Where a judicial officer concludes after a hearing that “no condition or combination of conditions will reasonably assure the appearance of the person as required and the safety of any other person and the community, such judicial officer shall order the detention of the person before trial.” 18 U.S.C. § 3142(e)(1).

### **Discussion**

For the reasons set forth below, the defendant presents an extreme risk of flight. He cannot overcome the statutory presumption in favor of detention. Each of the relevant factors to be considered as to flight risk – the nature and circumstances of the offense, the strength of the evidence, and the history and characteristics of the defendant – counsel strongly in favor of detention.

- A. The nature and circumstances of the offense and the strength of the evidence favor detention.

*Pattern of criminal activity and aggression:*

Animal abuse is often associated with other criminal activity. See Charlie Robinson & Victoria Clausen, *The Link Between Animal Cruelty and Human Violence*, FBI LAW ENFORCEMENT BULLETIN (Aug. 10, 2021) (“[A]nimal cruelty has been considered an isolated issue, but recent research shows a well-documented link that it is a predictive or co-occurring crime with violence against humans (including intimate partners, children, and elders) and is associated with other types of violent offenses”).<sup>1</sup> One study found that 70% of people who committed violent crimes against animals also had records for other crimes. Compared with a control group of their neighbors, animal abusers were five times more likely to commit violent crimes against people, four times more likely to commit property crimes, and three times more likely to have a record for drug or disorderly-conduct offenses. Arnold Arluke *et al.*, *The Relationship of Animal Abuse to Violence and Other Forms of Antisocial Behavior*, 14 J. INTERPERSONAL VIOLENCE 963 (1999); see also Tia Hoffer *et al.*, VIOLENCE IN ANIMAL CRUELTY OFFENDERS, (2018); *United States v. William Berry et al.*, 09-CR-30101-MJR, 2010 WL 1882057 (S.D. Ill. May 11, 2010), *aff’d sub nom. United States v. Courtland*, 642 F.3d 545 (7th Cir. 2011) (detailing history and negative social consequences of dog fighting).

Casillas fits this pattern. Records from the Puerto Rico Department of Justice indicate that Casillas was arrested (and later found guilty) in April and June 2007 for firearm and drug offenses:

Department of Justice History									
Defendant				Charges					
Complaint # / Incident #	Defendant Name	Birth Date	Age/Sex	Charged Crime	Disp. Crime	Disposition	Conviction	Resolution	Sentence
7 00197	CASILLAS - MONTEBO, ANTONIO	7/17/1971	30/M	1. Ley de Sustancias Controladas - conspiración.	Controlled Substances Act - Conspiracy	CULPABLE Guilty	PROBATION		2 AÑOS, 0 MESES, 0 DIAS 2 years, 0 months, 0 days
Arrest Date: 4/4/2007		Height/Weight: 5'7" / 150	SSN: [REDACTED]	2. Posesión de Armas sin Licencia - Retenimiento y uso.	Possession of Firearms without License - Retenimiento and use	CULPABLE Guilty	PROBATION		0 AÑOS, 0 MESES, 90 DIAS 0 years, 0 months, 90 days
Home Address: HUMACAO		Driver License #: [REDACTED]							

Department of Justice History									
Defendant				Charges					
Complaint # / Incident #	Defendant Name	Birth Date	Age/Sex	Charged Crime	Disp. Crime	Disposition	Conviction	Resolution	Sentence
7 00185	CASILLAS - MONTEBO, ANTONIO	7/17/1971	30/M	1. Ley de Sustancias Controladas - conspiración.	Controlled Substances Act - Conspiracy	CULPABLE Guilty	PROBATION		2 AÑOS, 0 MESES, 0 DIAS 2 years, 0 months, 0 days
Arrest Date: 6/27/2007		Height/Weight: 5'7" / 150	SSN: [REDACTED]						
Home Address: HUMACAO		Driver License #: [REDACTED]							

CERTIFIED TRANSLATION  
 I, Dennise A. Serrano, certify that this is an accurate translation of the original in Spanish to the best of my abilities. Pursuant to Local Rule 5(e)(3).  
 [Signature]

In 2021, Casillas’s adult son obtained an *ex parte* protective order against Casillas arising from numerous disagreements in which Casillas used foul language and was aggressive against his adult son. (“Plantea varias situaciones donde peticionado le profirió palabras soeces. Múltiples discusiones Peticionado con actitud agresiva”). The protective order required the eviction and disarming of Antonio Casillas.<sup>2</sup>

In addition, the Government’s investigation revealed the following videos/images recovered from accounts associated with Casillas:

<sup>1</sup> Available at <https://leb.fbi.gov/articles/featured-articles/the-link-between-animal-cruelty-and-human-violence#:~:text=One%20study%20found%20that%2016,then%20progress%20to%20harming%20animals.&text=Companion%20animals%20can%20be%20a,to%20victims%20of%20domestic%20abuse.>

<sup>2</sup> Court documents indicate that the concern was not a firearm, but the documents are unclear as to what weapon(s) Casillas possessed that were of concern.

In one video, Casillas brandishes a knife that he plunges into a pig's chest in front of a crowd and then poses, smiling, as the animal bleeds to death. Screenshots are depicted below and the video is submitted as Exhibit 1:





A colleague of Casillas, known as “Havana Danny,” shared a video with Casillas of a dog with a chain wrapped around its genitals:



Another video, taken by Casillas, showed a dog chained to a tread mill and being forced to run according to speeds chosen by Casillas. In other communications, Casillas explained that he would keep the dogs on the treadmill for up to an hour. One such video is attached as Exhibit

2. A screenshot from another video is below:



A treadmill of that same color and style was seized from Casillas' property pursuant to a federal search warrant executed on October 6, 2022:





*Animal fighting venture:*

The Government incorporates the affidavit in support of the Complaint filed at docket number 3-1.

In summary, the Government's investigation indicates that Antonio Casillas has been running Stone City Kennel with his partners (including one currently in Florida) for over 30 years, beginning around 1990. Stone City Kennel has been involved in over 150 dog fights. Stone City Kennel breeds and sells dogs for fights around the world, with its base in Humacao, Puerto Rico. Over the years, Casillas has refined his conditioning of fighting dogs, using steroids and other chemicals, including sustanol, winstrol, promobolon, and eritropoyectina. An audio recording of Casillas discussing steroid dosage ("roys") for dogs is attached as Exhibit 3. In communications heard/read by the Government, Casillas has boasted that he does not remove a losing dog from a fight.

The Government has seen or heard multiple communications to/from Casillas in which he negotiated the sales of fighting dogs to interested buyers in mainland United States, South America, Europe and India. For example, for one interested buyer in Alabama, Casillas explained that certain dogs for sale had fought two times in the Dominican Republic and once in Mexico. According to statements by Casillas heard/read by the Government, Casillas sold a champion female dog for \$20,000. A 27-month-old dog would be sold for \$5,000.

Casillas also took his dogs to fights, including in the Dominican Republic. In one fight in March 2018 in the Dominican Republic (based on communications read/heard by the Government), Casillas explained that his dog lost and died after the dog "got hit with bleeder on nose that never stop." In January 2019, he sent an invitation to a dog fight that Stone City Kennel had organized in the Dominican Republic (with weight requirements):

A-team knl and Stone city knls invites you to the world's best international convention in honor of peluche knl.. only the best Dogmen come out and compete on April 13 , 2019 in Dominican Republic send weights get your self lock in the best event on the globe hands down.. BEST 2 THE BEST.. \*\*\*\*\*disponible/ open \*\*\*\*\*..... Male- Macho .....38.5 looking for ch or better 39.75-40 Looking for winner or ch 31.50-31.75 looking for winner 45.5038.539.5catch weight35.2532.75 winner 42 34.53844.5-453650.540 🌐 ..... Female -hembras.....373335.2530.538.541All ready hooked 1☐do VS mx2☐doVAus3☐doVSus 4☐doVSDo5☐do VS GT6☐ DOUS VS AG7☐ DO VS do8☐ EC VS DO

Figures like “39.75-40” refer to weight ranges of dog fighting contestants (between 39.75 and 40 pounds)

A video found on one of Casillas’s accounts in which a man with a Dominican accent addresses “Tony” and is weighing a dog is attached as Exhibit 8. The Government requests three days to submit an English transcription/translation of the video, though “Tony” and the images of weighing the dog provide the essential information. Snapshots are below:



In an interview in 2012 with a dog-fighting publication, Casillas explained that one Stone City Kennel dog, “Nico,” won his first fight in Puerto Rico in twelve minutes and another fight in slightly over an hour. His third fight was in Florida, where he won in 47 minutes. He beat another dog from Puerto Rico in 42 minutes, before losing in a 90-minute fight. In that same interview, Casillas explained that another Stone City Kennel dog, “Yellowbuck,” “was a hard biting dog that could change a match around with one bite.” He won his first fight in one hour and seven minutes in St. Croix. He had four more fights before dying. Casillas further explained that another Stone City Kennel dog, “Jessie James,” won his first fight in Puerto Rico in 22 minutes. His fourth fight was in St. Thomas, and the dog eventually had “six champions to his credit.”

Attached as Exhibits 4 and 5 are recordings between Casillas (“Toñito”) and a federal agent from around September 30, 2022. A transcription and translation are below:

Voices	Transcript	Translation
	[00:04:58-00:06:08]	[00:04:58-00:06:08]
Toñito	<i>Man, I did dogs for 30 years, 35 years.</i>	<i>Man, I did dogs for 30 years, 35 years.</i>
SA Plaza	Wao, por 30 años, ¡coño! Ta' bueno.	Wow, 30 years, damn! That's good.
Toñito	<i>35, 35 years, I did dogs.</i>	<i>35, 35 years, I did dogs.</i>
SA Plaza	¿35 años?	35 years?
Toñito	<i>Yes, since I... I'm 51 and I've been doing dogs since I'm 17. So... yeah...</i>	<i>Yes, since I... I'm 51 and I've been doing dogs since I'm 17. So... yeah...</i>
SA Plaza	[laughs] So, la vida completa, ¿verdad?	[laughs] So your whole life, right?
Toñito	<i>All my life, bro. And I'm kinda... It's not the same stuff, you know?</i>	<i>All my life, bro. And I'm kinda... It's not the same stuff, you know?</i>
SA Plaza	¿De verdad? Sie- Siempre... [O/V]	Really? Al- Always... [O/V]
Toñito	<i>It's not the same game.</i>	<i>It's not the same game.</i>
SA Plaza	¿Siempre vendes en Puerto Rico?	You always sell in Puerto Rico?
Toñito	<i>Bro... eh, eh, yo he ido a to's lao. Porque I travel, I travel anywhere, bro.</i>	<i>Bro... uh, uh, I've been everywhere. Because I travel, I travel anywhere, bro.</i>
SA Plaza	<i>Yeah.</i>	<i>Yeah.</i>
Toñito	<i>I go to Mexico, eh... I go... I've been in Ecuador, I've been in Perú. I've been everywhere, bro.</i>	<i>I go to Mexico, eh... I go... I've been in Ecuador, I've been in Perú. I've been everywhere, bro.</i>
SA Plaza	Wao...	Wow...
Toñito	<i>Santo Domingo. I've been in New Jersey, New York. You probably heard of Stone City, Stone City Kennels.</i>	<i>Santo Domingo. I've been in New Jersey, New York. You probably heard of Stone City, Stone City Kennels.</i>
SA Plaza	Ujúm... Seguro, seguro.	Uh-huh... Of course, of course.

Toñito	<i>Yeah, we've been around. We've been around. We've done, maybe, over 150 matches, easy. You know? But, but it's not the same no more. You know? It ain't- it ain't... [O/V]</i>	<i>Yeah, we've been around. We've been around. We've done, maybe, over 150 matches, easy. You know? But, but it's not the same no more. You know? It ain't- it ain't... [O/V]</i>
SA Plaza	No era como los tiempos de antes, ¿verdad? [O/V]	It's not like the old times, right? [O/V]
Toñito	<i>I kinda lost that love, bro. You know?</i>	<i>I kinda lost that love, bro. You know?</i>
SA Plaza	<i>Yeah, no era como los tiempos de antes, ¿verdad?</i>	<i>Yeah, it's not like the old times, right?</i>
Toñito	<i>Not like the days before [U/I] Now, now you got to jail for this shit. You know what I'm saying? So, that- that-</i>	<i>Not like the days before [U/I] Now, now you got to jail for this shit. You know what I'm saying? So, that- that-</i>

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[00:07:10-08:00:00]

[00:07:10-08:00:00]

Toñito	<i>You can check it out. Sto- Put Stone City and you're gonna check it out. Yeah, we got- we got at least- at least 15 champions.</i>	<i>You can check it out. Sto- Put Stone City and you're gonna check it out. Yeah, we got- we got at least- at least 15 champions.</i>
SA Plaza	Wao, mira que bueno.	Wow, that's great.
Toñito	<i>Three grand champions, four registered merits.</i>	<i>Three grand champions, four registered merits.</i>
SA Plaza	¿De verdad? ¿Tres?	Really? Three?
Toñito	<i>Yeah, yeah. [O/V]</i>	<i>Yeah, yeah. [O/V]</i>
SA Plaza	Ave Maria Purisima.	Sweet Mother of Jesus.
Toñito	<i>Three grand champions. We had- We had Grand Champion Luca [P/H]. We had Grand Champion Awesome Buck [P/H]. We had Grand Champion uhm, uhm, Yellow Buck [P/H]. We had, we had Champion Jesse James [P/H], that he was a four-time winner. They broke a leg in the last ones, so that's why he didn't keep going.</i>	<i>Three grand champions. We had- We had Grand Champion Luca [P/H]. We had Grand Champion Awesome Buck [P/H]. We had Grand Champion uhm, uhm, Yellow Buck [P/H]. We had, we had Champion Jesse James [P/H], that he was a four-time winner. They broke a leg in the last ones, so that's why he didn't keep going.</i>
SA Plaza	Wao...	Wow...
Toñito	<i>We had Champion Miko [P/H] that he lost to Grand Champion IBM [P/H]. Este... allá en New Jersey.</i>	<i>We had Champion Miko [P/H] that he lost to Grand Champion IBM [P/H]. Uhm... over there in New Jersey.</i>
SA Plaza	¿De verdad?	Really?

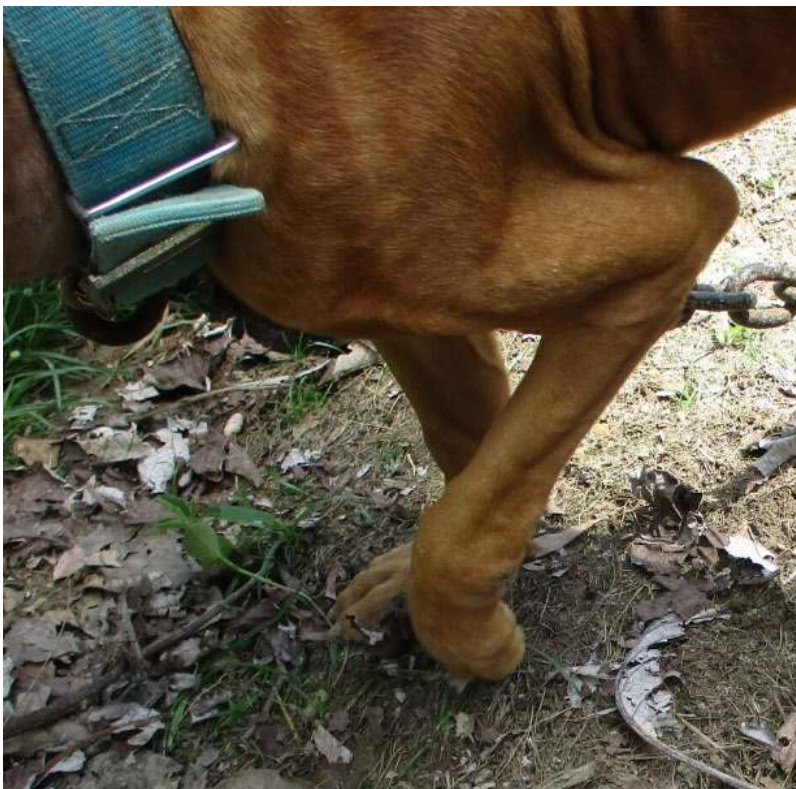
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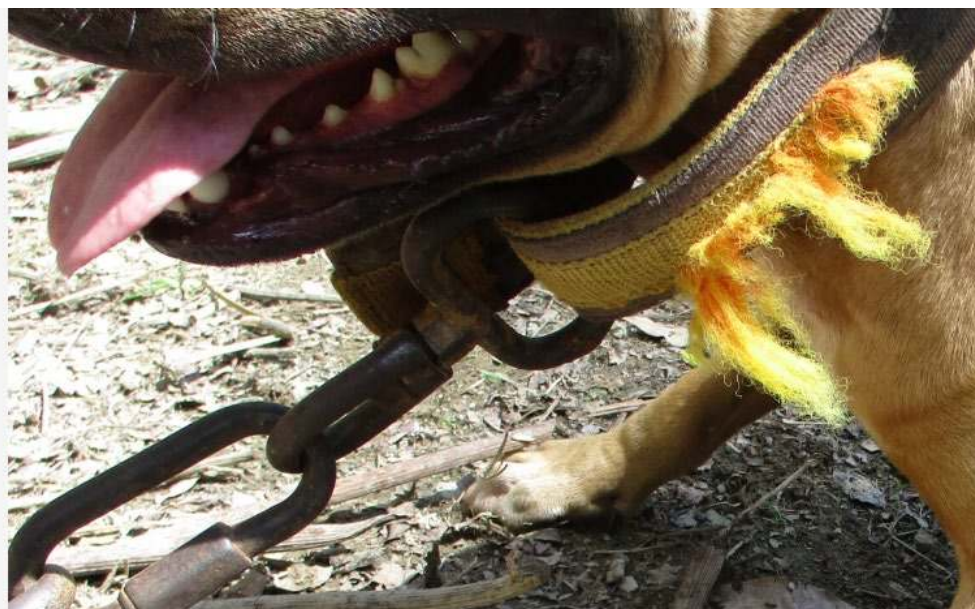
<b>Toñito</b>	<i>That was- That was a four-time winner, also.</i>	<i>That was- That was a four-time winner, also.</i>
<b>SA Plaza</b>	<i>Wao, mijo.</i>	<i>Wow, man.</i>
<b>Toñito</b>	<i>Yeah, yeah, we've been- we've been- we've done the game. You know?</i>	<i>Yeah, yeah, we've been- we've been- we've done the game. You know?</i>
<b>SA Plaza</b>	<i>Yeah.</i>	<i>Yeah.</i>
<b>Toñito</b>	<i>We've done the game. You know? It ain't like...</i>	<i>We've done the game. You know? It ain't like...</i>

On October 7, 2022, a search warrant was executed on a residence associated with Casillas. Agents found four pit bull-type dogs chained to stakes near blue barrels converted into kennels. A video of the scene is attached as Exhibit 6. Photos of the dogs are below. One of Stone City Kennel's dogs found by federal agents was limping. A preliminary analysis indicates a potentially long-term, broken bone that may require amputation. Other dogs had marks consistent with dog-fighting scars (an expert analysis is pending). Preliminary medical tests on the dogs indicate infections of heartworm, intestinal parasites, and parvovirus. Marks on the dogs' necks indicate that heavy metal chains were attached long-term around collars on their necks.













Water bowls:



**B. The characteristics of the defendant favor detention.**

***Defendant's extensive international ties favor detention***

Defendant's extensive international ties would make it easy for him to flee and live abroad. Travel records from United States Customs and Border Protection reflect that, only since 2017, the defendant has engaged in the following international travel:

- Mexico City, Mexico (March 2017)
- Santo Domingo, Dominican Republic (March 2017; July 2017; November 2017; July 2021)
- Santiago, Dominican Republic (December 2017; March 2018; October 2018; April 2019; October 2019)
- Punta Cana, Dominican Republic (January 2021)
- Cancún, Mexico (May 2021)
- Panama City, Panama (August 2017)
- Barbados (April 2019)

The investigation has also revealed an international network that defendant has used for dogfighting, which could serve for his flight from prosecution. This network is evident from Casillas' financial transactions. He is active on Western Union, sending and/or receiving money from/to the Dominican Republic, Ecuador, the Virgin Islands, and Antigua & Barbuda.

Casillas is adept at using various money-transfer businesses (despite Casillas' multiple bank accounts). In two months, he sent over \$8,000 in money transfers via Walmart, causing the employee to comment that the "client comes various times a week to send large sums of money."

Defendant has extensive ties to the Dominican Republic, where he has repeatedly traveled for dog fights. Below is a photo from one of those trips:



In communications reviewed by the Government, Defendant identified the people in the photo as “Stone city [himself on the left],” “cane valley heavy” “amin” from “Bahrain.” The man in the middle, who ran Cane Valley Kennels, was indicted on a cocaine and crack trafficking ring in 2021 and then sentenced in January 2022 to five years in prison in the Middle District of Georgia for a multi-state dogfighting operation that included Alabama, Florida and Georgia.

Defendant’s international ties are long-standing. In May 2012, at the Pan American Dock in San Juan, Puerto Rico, Antonio Casillas was searched following travel via international ferry from Santo Domingo, Dominican Republic. Federal agents found ten 50 MG ampoules of an anabolic steroid in his luggage. Stanozolol, also known as Winstrol, is an anabolic steroid. Casillas has indicated that he uses Winstrol in training dogs for fights.

In August 2019, Defendant informed an acquaintance that he wanted to leave Puerto Rico and to have his dogs in the Dominican Republic and a house in Florida.

Defendant also has professional and personal ties to Quito, Ecuador, where he has stated that he sends dogs to his friends there who “work” the dogs. He also has ties to Mexico. Below is a photo of defendant and a pit bull-type dog on one of his trips to Mexico:



Defendant also has a detailed knowledge of how to send contraband (fighting dogs) internationally, which would serve him well in fleeing from prosecution:

- In August 2020, he planned with a resident of Mexico the smuggling of a dog from San Antonio, Texas into Mexico. When informed that only United States citizens could pass the border at that time, defendant explained that he would “arrange” (“cuadrar”) that.
- In October 2019, defendant explained how to send a dog to Bogotá, Colombia through the Dominican Republic.
- In April 2020, defendant discussed logistics of sending a dog to Europe.
- In April 2020, defendant discussed logistics of sending a dog to India.
- In November 2020, defendant was invited to join a group of “dogmen” “from different states and countries who share the same goal—forming an international fraternity club, where only those in the know can join.” It is oriented around a “private website—independent of social media platforms.” The person who invited Casillas emphasized that “since I’m not located in the US—and neither [are] the servers—US laws does not apply.”

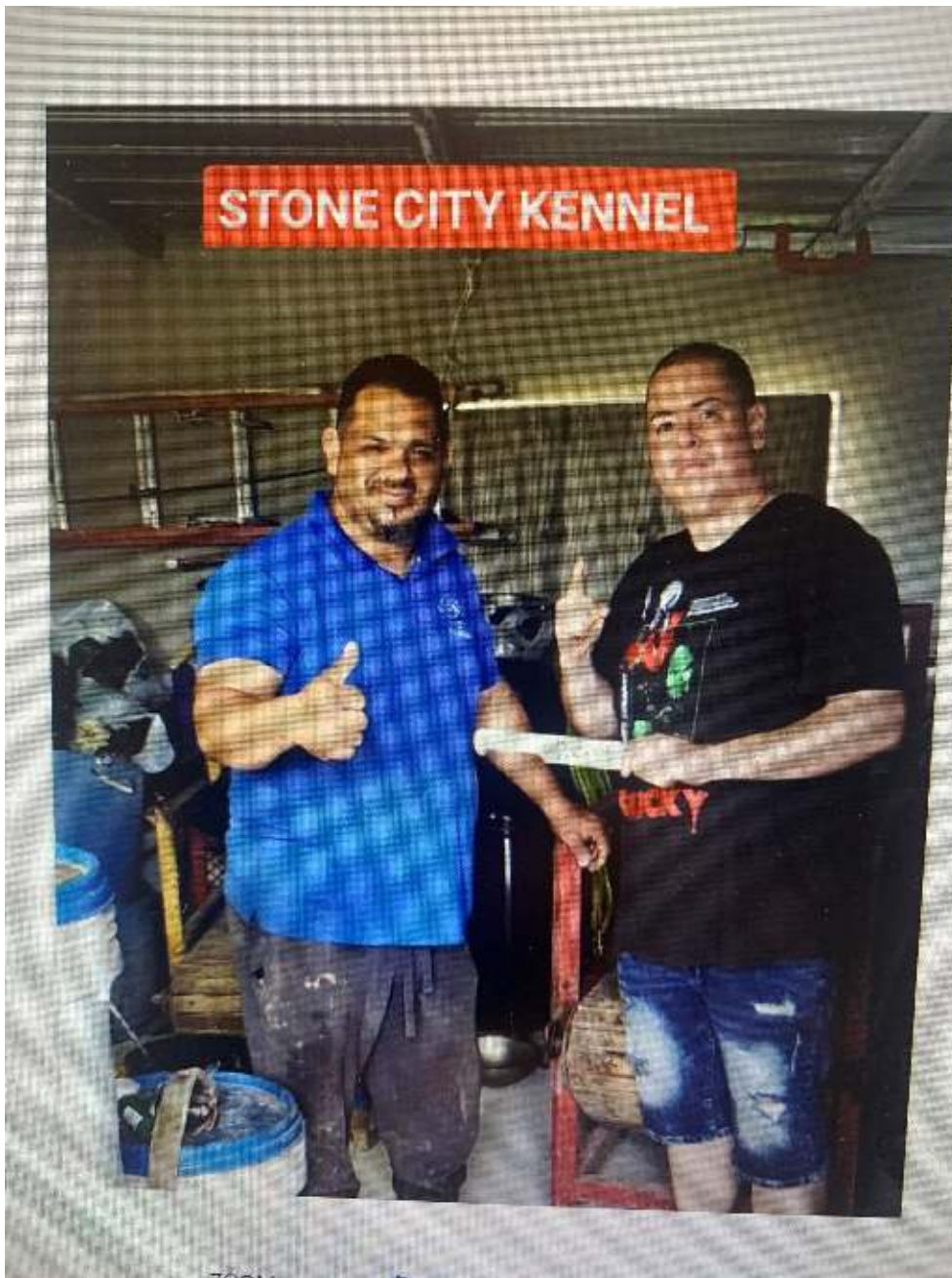
**Defendant’s fan base could facilitate flight**

Stone City Kennel has a devoted following that could facilitate Casillas’s flight, as evidenced by the following:

- In an interview in a dog-fighting magazine over ten years ago, Stone City Kennel was described as “a household name.”
- On January 9, 2022, Casillas received the following messages from Jamie Hodge in the British territory of Anguilla: “Your [*sic*] a Caribbean legend made us proud with your stock”
- The below photo from around 2020 shows Casillas with a fan who lives in Puerto Rico. The fan is holding a “break stick,” which is used to break the grip of a dog who has bitten into the flesh of another dog during a fight. Famous dog fighters may sign break sticks for their



dogfighting fans. This stick reads: “Tony SCK.” “SCK” is an abbreviation used for “Stone City Kennel.”





Defendant's support may include at least one veterinarian in Puerto Rico. Veterinarian paperwork is generally required to ship dogs out of Puerto Rico. In several conversations, Casillas refers to obtaining paperwork from a veterinarian for shipments of dogs that he is selling. In 2021, Casillas explained to someone whose dog was badly injured that Casillas could obtain Cephalexin 500 (an antibiotic) from "my vet" and ship it. In 2018, a veterinarian in Puerto Rico contacted Casillas to tell him to get out of dog fighting because someone had been arrested for it.

**Defendant's unexplained sources of wealth, which could facilitate flight, favor detention**

In addition, the defendant appears to have access to significant financial resources that would enable his flight from prosecution. Below are photos of a residence of defendant, which is located in Humacao:











A video of the property, which seems to have been taken by Casillas or someone associated with him, shows the extent of the residence, as well as what appear to be several dogs chained on the property. (Exhibit 7)

In May of 2019, Casillas communicated that he was considering selling the house for almost half a million dollars. In the end, he did not. Instead, he has recently been renting certain parts of the property for limited periods of time on Airbnb. According to the pretrial report, Casillas is renting out the house for \$10,000/month.

According to the Puerto Rico Department of Transportation, Casillas and his wife have eight cars registered to themselves. His residence has a carport for numerous vehicles:



In addition, records indicate that Casillas and his wife have a timeshare in Florida via Westgate Resorts.

What is the source of the wealth that finances a mansion with a private movie theater, numerous cars, a timeshare and at least 14 international trips since 2017? Allegedly, the primary legal source of Casillas's income is a pizza shop, Stone City Pizza, in Humacao that is cash only (no credit cards accepted). Below is a photo of the pizzeria:





A preliminary financial analysis indicates that the business's annual, reported net income since 2017 (the starting year of the government's analysis) has been less than \$30,000. There are significant discrepancies between the tax returns and bank accounts.

What about the illegal sources of Casilla's income? According to the Government's investigation, Casillas would sell a champion female dog for \$20,000. Puppies would be sold for \$1,200. A 27-month-old dog would be sold for \$5,000. A single champion could have as many as 29 offspring. Costs were not high, as evidenced by the conditions in which the dogs were found on Casillas's property.

Moreover, there is evidence that Casillas has access to Stone City Kennel dogs that were not yet seized by the Government. In a recorded conversation on around September 30, 2022, Casillas said that he had several dogs with a friend, including one that would soon give birth.

Given the prices of Stoney City Kennel dogs, these animals could be worth tens of thousands of dollars.

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Home confinement with electronic monitoring would be inadequate to mitigate the high risk that the defendant would flee, as he could easily remove a monitoring device. The Dominican Republic—a favorite and frequent destination of Casillas—is a boat-ride away. At best, home confinement with electronic monitoring would merely reduce his head start should he decide to flee. *See United States v. Zarger*, No. 00 Cr. 773, 2000 WL 1134364, at \*1 (E.D.N.Y. Aug. 4, 2000) (Gleeson, J.) (rejecting defendant’s application for bail in part because home detention with electronic monitoring “at best . . . limits a fleeing defendant’s head start”).

### **Conclusion**

The defendant is an extreme risk of flight because of ample financial resources and unexplained sources of wealth.

He has an extensive international network, which includes people adept at avoiding the laws.

He has knowingly violated the law for decades, which suggests that he would not comply with conditions imposed by the Court.

He is charged with a conspiracy; and his cohorts remain free (including one who has been living in Florida) and could facilitate his escape.

Finally, defendant is currently facing a maximum sentence of five years for one count. However, based on the search warrant executed on his property on October 6, several, additional charges are possible (one charge for each of the four dogs found on his property). Each of those

charges would carry its own five-year sentence. If found guilty of five counts, defendant would be facing a statutory maximum of 25 years, creating further incentives for him to flee.

There are no conditions of bail that would assure his presence in court proceedings in this case. Accordingly, any application for bail should be denied.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this October 11, 2022.

W. Stephen Muldrow

United States Attorney

/s/ Jonathan Gottfried

Jonathan Gottfried, G-02510

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

s/ Jonathan Gottfried

Jonathan Gottfried

Assistant United States Attorney