

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO

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UNITED STATES OF AMERICA

v.

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

INDICTMENT

CLERK'S OFFICE USDC PR

Criminal No. 22- **437-SCG** 2022 OCT 6 PM 3:51

Violations:
18 U.S.C. § 371
7 U.S.C. §§ 2156(a)(1) & (2); (b)
18 U.S.C. § 49

(ONE COUNT)

THE GRAND JURY CHARGES:

COUNT ONE

**Conspiracy to Violate the Animal Welfare Act
(7 U.S.C. §§ 2156(a)(1) & (2); 7 U.S.C. § 2156 (b))
(18 U.S.C. §§ 49 and 371)**

Beginning at a date unknown to the Grand Jury and continuing until the date of this indictment, in the District of Puerto Rico and elsewhere, the defendant Antonio Casillas and others, did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons, known and unknown to the Grand Jury, to commit certain offenses against the United States, to wit:

Knowingly sponsor and exhibit dogs in an animal fighting venture, in and affecting interstate commerce, in violation of 7 U.S.C. § 2156(a)(1) and 18 U.S.C. § 49;

Knowingly attend an animal fighting venture, in and affecting interstate commerce, in violation of 7 U.S.C. § 2156(2)(A) and 18 U.S.C. § 49; and

Knowingly buying, selling, delivering, possessing, training, and transporting animals for participation in an animal fighting venture, in and affecting interstate commerce, in violation of 7 U.S.C. § 2156(b) and 18 U.S.C. § 49.

Objects of the Conspiracy

The objects of the conspiracy were: (1) knowingly to sponsor and exhibit dogs in an animal fighting venture, in and affecting interstate commerce, in violation of 7 U.S.C. § 2156(a)(1) and 18 U.S.C. § 49; (2) knowingly to attend an animal fighting venture, in and affecting interstate commerce, in violation of 7 U.S.C. § 2156(a)(2)(A) and 18 U.S.C. § 49; and (3) knowingly buying, selling, delivering, possessing, training, and transporting animals for participation in an animal fighting venture, in and affecting interstate commerce, in violation of 7 U.S.C. § 2156(b) and 18 U.S.C. § 49.

Matter and Means of the Conspiracy

The members of the conspiracy used various manners and means to effect the object and purpose of the conspiracy, including but not limited to:

As part of the conspiracy, the defendant and his coconspirators purchased, received, bred, trained, conditioned, transported, and delivered dogs for the purpose of entering them in animal fighting ventures.

As part of the conspiracy, the defendant and his coconspirators knowingly attended animal fighting ventures.

It was further part of the conspiracy that the defendants and their co-conspirators purchased, received, bred, trained, conditioned, transported and fought dogs for purposes of selling those dogs to be used in animal fighting ventures.

Overt Acts

For decades, Casillas and his co-conspirators (including one who has been living in Florida) have operated in Puerto Rico and elsewhere "Stone City Kennel," which breeds and fights dogs, including pit-bull type dogs, in the United States and internationally. Stone City Kennel has participated in over 150 dog fights in in Puerto Rico, Mexico, Ecuador, Peru, the Dominican Republic, New Jersey and New York.

During the course of the conspiracy, Casillas has trained dogs in Puerto Rico for animal fighting ventures. This has included chaining pit-bull type dogs to tread mills to walk or run for miles. In 2018, Casillas explained that, with respect to new dogs, “[w]e start on 5 miles n 15 min on [tread]mill.” A photo of one such dog, with possible bite-mark scars on the head, is below:



Stone City Kennel also has used steroids on its fighting dogs, including winstrol, metenolone, and sustanon.

Casillas would sometimes send his dogs outside of the United States to be conditioned for

fighting. This included sending dogs to St. Croix and Ecuador. Some of the reasons were, according to Casillas, the risk associated with conditioning the dogs in the United States and that he had friends abroad who worked the dogs well.

During the course of the conspiracy, Casillas sold pit-bull type dogs for animal fighting ventures, including a female "champion" (a dog who has won around three fights) for approximately \$20,000. Other dog sales were negotiated for prices ranging from \$1,000 to \$10,000, with shipment to the mainland United States via airplane cargo for \$200, in addition to the veterinary and kennel expenses. Casillas encouraged potential buyers to fly to Puerto Rico to pick up the dogs in his possession.

In 2020, Casillas explained that Stone City is "Me n my partner in Florida."

According to Casillas, he does not "pick up" dogs during fights, meaning that he does not remove a losing dog from a fight.

Stone City Kennel fought a dog named Miss Piggy against another dog whose owner, "Jim Comb," (according to Casillas) travelled to Puerto Rico for the fight. Stone City Kennel fought Miss Piggy in at least two other fights in Puerto Rico.

On January 27, 2018, Casillas invited a third party to his house for a dog fight the following day at 8 AM.

On or about March 21, 2018, Casillas traveled from Puerto Rico to the Dominican Republic to enter a dog that he possessed in an animal fighting venture on or about March 24, 2018 in Santo Domingo. The dog was injured during the fight and died afterwards.

On January 5, 2019, Casillas (a/k/a Stone City Kennel) promoted a dog fighting event to take place on April 13, 2019 in the Dominican Republic.

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- Macho38.5 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☐oo
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In October 2019, Casillas explained to a third party (who stated that he had seen a Stone City Kennel dog in a dogfight) that he could send one of his dogs to Bogotá, Colombia through the Dominican Republic. Casillas sent a pedigree of one of the available dogs to that individual, which indicated the dog-fighting wins in its lineage.

In February 2020, Casillas offered to sell for \$5,000 a 26-month-old dog in his possession who had had test fights of five minutes, fifteen minutes, and twenty minutes.

In February 2020, Casillas told a potential purchaser in Europe that one of his winning dogs would cost \$10,000.

In February 2020, Casillas told another purchaser in Europe that he could sell one of his dogs for 4,000 euros (not including shipping). A pedigree of the Stone City Kennel dog was provided, with descriptions of dog-fighting wins. Casillas explained that a 29-month-old dog had been involved in a 20-minute fight already and that the dog's father was a "R.O.M.," which is a term used to indicate that a dog has produced dog-fighting champions.

In April 2020, Casillas told a potential purchaser in India that transportation costs for one of his dogs would be approximately \$700 for tickets to/from Puerto Rico (for the potential buyer) plus \$300 for transporting the dog. Casillas further explained that it was cheaper for the potential buyer to travel with the dog than it was to send the dog by himself. He described one dog to this potential purchaser as "[n]o killer but smart fighter."

In May through July 2020, Casillas discussed dog fighting with a third party. The third party asked Casillas if he would sell one of his dogs, and Casillas responded "Make an[] offer."

The third party offered \$5,000. Casillas responded: "Let me talk to my brother we partner on that bitch ill get back to u." He later stated: "Do u want to come for her or were u want me to send it."

In August 2020, Casillas discussed sending a dog to Austin, Texas and arranged the details for a third party to take the dog across the U.S. border into Mexico.

In August 2020, Casillas offered to sell a two-time dog-fighting winner for \$4,500 to a potential buyer in South Carolina. Casillas explained that "[r]ight now u can come to pr for \$50 buck...and take him." Casillas explained that payment could be made through Paypal.

In March 2021, Casillas was negotiating with a potential purchaser in Louisiana the sale for \$4,500 of a dog. He referred the purchaser to an online page, which indicated the dog-fighting wins in the dog's lineage.

With that same potential purchaser, Casillas explained in March 2021 that he intended to fight the dogs in the Dominican Republic. Then, in June 2021, Casillas stated that "[w]e had a lot of problem taking them out of here But we finally did." Casillas confirmed that his dogs had fought.

In June 2021, Casillas told a potential purchaser in Alabama of one of the Stone City Kennel dogs that transportation costs were as follows: "If cargo is working 200 plus vet n kennel. If u going to get a pup he can go on cabin for 100." He explained that he had dogs "ready to go" with fights in the Dominican Republic and in Mexico. Casillas further explained that his dogs must first fight before being used to breed, and "That how we been doing it for the last 30 years." In May 2020, Casillas told another potential purchaser "u can not leave this shit 30 plus year ain't enough."

In July 2021, Casillas travelled from Puerto Rico to fight Stone City Kennel dogs in the Dominican Republic on July 24. The dogs of Stone City Kennel lost.

In January 2022, Casillas stated that he had given two dogs to a friend but "both lost."

Nonetheless, he stated that Stone City Kennel “will always have some” dogs.

In July 2022, a potential purchaser communicated with Casillas that he had been “asking about getting a dog from you... You have this blood still available?” Casillas responded, “come on get one.”

On September 30, 2022, Casillas indicated to a person known to the grand jury the following:

- Casillas is part of Stone City Kennel;
- Casillas has been engaged in dog fighting for 35 years;
- Stone City Kennel has participated in over 150 dog fights;
- Casillas has participated in matches in many jurisdictions, including Mexico, Ecuador, Peru, Dominican Republic, New York, and New Jersey;
- Casillas has trained four dogs at a time to fight;
- Casillas currently has three females (one of whom will soon have a litter) and two males; and the two males can be sold for \$2,000 each.

On October 6, 2022, four pit-bull-type dogs chained near over-turned barrels were found on property associated with Casillas in Humacao, Puerto Rico.



All in violation of 18 U.S.C. §§ 49, 371 and 7 U.S.C. §§ 2156(a)(1), (2)(A) & (b).

FORFEITURE

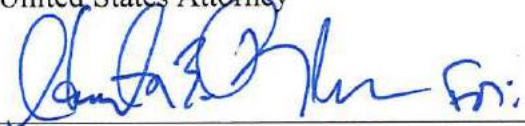
As a result of the offenses charged above, the defendants shall forfeit to the United States any animal involved in those offenses. All pursuant to 7 U.S.C. § 2156(f) and 28 U.S.C. § 2461(c).

TRUE BILL

FOR PERSON

Date: 6 OCT 2022

W. STEPHEN MULDROW
United States Attorney



Timothy Henwood
Chief, Criminal Division



Jonathan Gottfried
Assistant United States Attorney
Chief, Violent Crimes Unit