

**AFFIDAVIT OF ASSISTANT SPECIAL AGENT-IN-CHARGE**  
**CHRISTOPHER ROBINSON**

I, Christopher Robinson, being duly sworn, depose and state as follows:

**AGENT BACKGROUND**

1. I am an Assistant Special Agent-In-Charge (ASAC) with the United States Department of Agriculture, Office of Inspector General (USDA OIG).<sup>1</sup> I have over eight years of experience as an USDA OIG ASAC supervising a multitude of criminal, civil, and administrative USDA investigations. My primary area of responsibility for those USDA investigations is the six New England states and New York. Prior to becoming an ASAC, I was a Special Agent with USDA OIG for approximately fifteen years. I am a graduate of the Criminal Investigator Training Program at the Federal Law Enforcement Training Center, and I hold a bachelor's degree in business administration.

2. I am authorized to conduct and supervise investigations relating to the programs and operations of the USDA, to make arrests, execute warrants, and carry firearms as authorized by the Agriculture and Food Act of 1981 (P.L. 97-98) and to exercise all duties and responsibilities authorized by the Inspector General Act of 1978 or incident thereto, including the authority to obtain USDA records and information, to administer oaths, and to undertake other duties as necessary in support of the mission of the USDA OIG.

3. In my current role, I conduct and supervise investigations of violations of the animal fighting prohibitions of the federal Animal Welfare Act (AWA), Title 7, United States

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<sup>1</sup> I am an “investigative or law enforcement officer” within the meaning of 18 U.S.C. § 2510(7) in that I am an officer of the United States who is empowered by law to conduct investigations and to make arrests for federal felony offenses. I also am a “federal law enforcement officer” within the meaning of Rule 41 of the Federal Rules of Criminal Procedure.

Code, Section 2156<sup>2</sup>, and Title 18, United States Code, Section 49 as a principal part of my duties.<sup>3</sup>

I have personally participated in numerous dogfighting investigations across the United States including executing multiple dogfighting-related search warrants. I have received and provided specialized training related to animal fighting and related federal and state offenses. I have personally participated in animal fighting investigations in Connecticut, Florida, Georgia, Illinois, Maryland, Massachusetts, Maine, Michigan, Missouri, New Hampshire, New York, Oregon, Rhode Island, and Virginia. Through training, investigations, and undercover contacts of persons involved in animal fighting offenses, I am familiar with the actions, traits, habits, and terminology utilized by subjects involved in dogfighting ventures.

4. The statements in this affidavit are based, in part, on information provided by other law enforcement officers and on my investigation of this matter. I have not included every fact known to me concerning this investigation because this affidavit is being submitted for the limited purpose of establishing probable cause for the issuance of the requested criminal complaint.

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<sup>2</sup> The Secretary of Agriculture is authorized to enforce the AWA, which provides that, “[t]he Secretary or any other person authorized by him shall make such investigations as the Secretary deems necessary to determine whether any person has violated or is violating any provision of this section.” 7 U.S.C. § 2156(e).

<sup>3</sup> The AWA sets general standards for humane care and treatment that must be provided for certain animals. Congress assigned the USDA with the responsibility for enforcing the AWA, which defines “animal fighting venture” as “any event, in or affecting interstate or foreign commerce, that involves a fight conducted or to be conducted between at least two animals for purposes of sport, wagering, or entertainment.” 7 U.S.C. § 2156(f)(1). It is illegal to sponsor or exhibit an animal in an animal fighting venture, 7 U.S.C. § 2156(a)(1), and to possess, train, sell, buy, transport, deliver or receive an animal for purposes of having the animal participate in an animal fighting venture. 7 U.S.C. § 2156(b). The AWA also makes it a crime to knowingly use the mail or any instrumentality of interstate commerce for commercial speech for advertising a fighting animal or promoting or furthering an animal fighting venture. 7 U.S.C. § 2156(c). These criminal offenses are felonies punishable by up to five years in prison. 7 U.S.C. § 2156(i); 18 U.S.C. § 49. Conspiring to commit these offenses is a federal felony offense. 18 U.S.C. § 371.

**PURPOSE OF AFFIDAVIT**

5. I am currently investigating Corey ELLIOTT (born 1977) of Carver, Massachusetts, and others, for conspiracy to commit an offense against the United States, in violation of Title 18, United States Code, Section 371, that is, sponsoring and exhibiting an animal in an animal fighting venture, in violation of Title 7, United States Code, Section 2156(a)(1) and Title 18 United States Code, Section 49, and, possessing, training, transporting, delivering, and receiving any animal for purposes of having the animal participate in an animal fighting venture in violation of Title 7, United States Code, Section 2156(b) and Title 18, United States Code, Section 49 (the “TARGET OFFENSE”). I submit this affidavit in support of a criminal complaint charging ELLIOTT with the TARGET OFFENSE.

**BACKGROUND ON DOGFIGHTING**<sup>4</sup>

6. In the United States, dogfighting ventures involve dogs of various breeds including pit bull-type dogs, which dogfighters prefer for their compact muscular build, short coat, and the aggression that they can display toward other dogs. A dogfight occurs when two dogs are knowingly released by their handlers in a controlled environment to attack each other and fight. The fight ends when one of the following events occurs: (a) a dog withdraws; (b) a handler “picks up” their dog and forfeits the match; (c) one dog kills the other dog; or (d) both dogs die.

7. Dogfights, commonly referred to as a “match,” “fight,” or “show,” often occur in rectangular or square enclosures with low walls. Dogfighters refer to an enclosure for dogfighting as a “pit” or “box.” Enclosures can be constructed with plywood and dimensional lumber to allow for transport and convenient assembly/disassembly of the enclosures.

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<sup>4</sup> The statements in this section are based on my training and personal experience investigating animal fighting ventures and on information provided to me by other law enforcement personnel.

8. Because of their conditioning and training, dogs used in animal fighting ventures are typically housed separately from other dogs, in pens, cages, or on chains, so that they will not hurt or kill other dogs when the handler is absent. Heavy chains, also known as logger chains, are often used when restraining dogs for the dual purposes of controlling the strong animals and developing strength for fighting.

9. Dogfighters often fight dogs with a goal of obtaining “Champion” (Ch) or “Grand Champion” (Gr Ch) status for their dogs which is achieved by winning three or five fights, respectively. Dogfighters may maintain contact with other dogfighters around the country and can generate substantial income from gambling on dogfights and from the sale and breeding of fighting dogs.

10. Dogfighters select the strongest, most capable fighting dogs and selectively breed, sell, and fight only those dogs that display particular traits. Some of the desirable traits are: (1) “gameness” or aggressiveness and propensity to fight other dogs until the death; (2) a willingness to continue fighting another dog despite traumatic and/or mortal injury; and (3) cardiovascular endurance to continue fighting for long periods of time and through fatigue and injury. Dogs displaying these attributes are often bred with other dogs displaying similar traits to enhance the bloodline of these dogs for fighting purposes. Dogfighters such as the individuals described in this affidavit often keep such dogs for the purposes of furthering animal fighting ventures.

11. Those involved in training fighting dogs commonly possess several fighting dogs at one time for several reasons. Dogfighters maintain a stock of dogs at different weights and both sexes because in dogfights, dogs are matched against other dogs to within a pound of the same weight against dogs of the same sex. Maintaining a stock of several dogs thus increases the odds of owning a dog whose weight and gender meet the requirements for a match being solicited by a

potential opponent. Dogfighters also maintain multiple dogs in order to selectively breed, sell, and fight dogs with certain traits or to otherwise advance a particular dogfighting bloodline.

12. Further, dogfighters may possess an inventory of dogs because dogs often die or are badly injured during fights. Possessing multiple dogs also increases the prospects of owning a dog who will become a “Champion” or “Grand Champion.” Dogfighters also routinely test and evaluate their dogs to determine those that exhibit aggressive behavior, including against their own dogs.

13. Dogfights typically involve consistent practices leading up to and during the fight. Fighting dog owners or handlers enter a verbal or written contract with their opponent several weeks before the dogfight. Dogfights may be organized under the guise of a “weight pulling competition” to conceal the true nature of the criminal activity and provide potential deniability if their actions are discovered by law enforcement. The owners or handlers typically agree upon: (1) the sex and set weight of the dogs to be fought; (2) the location where the fight will occur (the exact location of which is often a guarded secret until shortly before the fight); (3) a referee; (4) the payment of “forfeit” money that is lost if one participant pulls out of the match or if a participant’s dog does not meet the agreed-upon weight; and (5) monetary wagers placed by the respective fighters.

14. It can be challenging for dogfighters to find an opponent with a dog of the same weight and sex who is looking to fight that dog at the same time of year, and for a wager that is mutually agreeable to both parties. For that reason, dogfighters often rely heavily on each other and on extensive networks of contacts to find an opponent who has a dog of the same weight and sex and who is looking to fight that dog at the same time of the year. The practice is known as “calling out a weight.” Dogfighters often “call out a weight” to known dogfighters in several states,

to increase their odds of finding a match. “Calling out a weight” may be accomplished by telephone, text message, e-mail, or other electronic communication including social media platforms like Facebook.

15. Once a dogfighter locates an opponent and agrees upon terms, the match is “hooked,” or set up. The dogs then undergo a conditioning process dog handlers refer to as a “keep.” A “keep” is typically conducted for six to eight weeks before the scheduled match and involves a training program including treadmills, “slat mills,” or “carpet mills” used to run and exercise the dogs away from public view; weighted chains and pulling devices used to increase the dog’s strength and stamina; the use of devices such as “spring poles” which consist of an animal hide or other material suspended from a heavy spring, rope, or sapling that the dog can bite and hold to build jaw strength and increase aggression and “flirt poles” which are training devices used entice a dog to chase a stimulus on a string at the end of a pole; water-based training such as tethering a dog to a cable running across a pool forcing it to swim for extended periods; and the administration of drugs, vitamins, and other medicine. Dogfighters use legal and illegal drugs to increase the strength and stamina of their fighting dogs, including using anabolic steroids to build muscle mass and aggression.

16. Dogs matched for future fights are expected to achieve their established target weight by the scheduled match, much like in human boxing matches, requiring close attention to a dog’s training routine. Training can take place at a dogfighter’s “dog yard” or indoors away from public view, often in a basement.

17. Although dogs used for fighting are often housed outside in many parts of the country, as the match date approaches, a dog in a keep may be housed indoors or near the owner/handler for several reasons. One reason is to prevent the dog from becoming sick or injured

by other dogs before the match, which could cause the dog to forfeit and the owner to pay a forfeit fee. Another reason is that dogs in a keep require constant exercise and monitoring, which is easier when the dog is in close vicinity rather than off-site or outside. Dogs intended for fighting purposes are also often housed inside residences if they are injured, ill, pregnant, weaning, or if a dogfighter does not have another location to keep them or wants to keep them out of view. Fighting dogs kept in urban, suburban, or otherwise densely populated areas are housed indoors to limit visibility of their activities.

18. Some dogfighters are selective about who they will sell fighting dogs to because the later success of that dog in the fighting ring will reflect on the seller whose bloodline is represented by the dog. A dog that produces multiple offspring that go on to be “Champions” (*i.e.*, winning three or more dog fights) is bestowed the “Register of Merit” (ROM) title. This provides incentive to the seller to sell dogs to capable dog fighters, with the intention that the dogs will be fought successfully and increase the value of the seller’s dog and its offspring.

19. Following a match, if the dog survives, the handler will typically allow the dog several months to recover from injury, before re-assessing that dog’s fighting fitness and hooking it for the next match. It is typical for a dogfighter to match (fight) a particular dog no more than once every nine to twelve months. Thus, the active career of a successful fighting dog could span several years, during which time the dog would remain in the owner’s custody.

20. Commonly, those operating dogfighting ventures maintain pedigrees, books, records, ledgers, and journals relating to the possession, purchase, transportation, sale, breeding, and training of fighting dogs. These materials exist in both hard and electronic copy and are frequently transmitted through the Internet on websites, forum, and social media. The “pedigree” of a fighting dog shows the dog’s name, with reference to the dogfighting “kennel,” as well as

breeding lineage going back multiple generations, with references to the number of fights won by that dog and its predecessors. Pedigrees are important in the dogfighting “industry” because they allow dogfighters to maintain information on whether a particular “bloodline” or breeding combination resulted in desired fighting traits thereby increasing the value of dogs from a successful bloodline.

21. Historically, “underground” dogfighting publications similar to magazines are routinely published and distributed to readers through periodic subscriptions, which describe and report on recent fight details and past results from around the country using coded language. They also describe various “kennels” or dog breeders who raise dogs for animal fighting purposes. In addition, there are online versions of published magazines that serve the same purpose, as well as websites where dogfighters post pedigrees to demonstrate the fighting lineage of their dogs. Dogfighters also may keep detailed ledgers and journals that specifically depict how certain dogs performed during a particular fight, together with the duration and outcome of fights.

22. Dogfighters today tend to communicate with each other via text messages, Facebook, email, or website chat rooms dedicated to “game dogs.” Dogfighters routinely “hook” matches and exchange documents, expertise, photographs, or videos relating to dogfighting activities via email and other electronic means. Social media offers individuals who engage in animal fighting with the ability to communicate using text messages and audio calls, transmit and receive pictures and videos of animal fighting, and establish and widen animal fighting networks. Public and private Facebook groups dedicated to dogfighting exist. Dogfighters exchange photographs and videos of dogs, for example, to demonstrate a dog’s conformation or build, gameness, and other fighting qualities, when soliciting or advertising a dog for purposes of breeding, buying, or arranging a fight.

23. Dogfighters also post fighting dog pedigrees on the website <http://www.apbt.online-pedigrees.com>, known as “Peds Online” or “Online Peds.” Dogfighters use this as a repository for breeding information to prove and verify the lineage of their fighting dogs or opponents their dogs will be fighting against or dogs the dogfighters are considering buying or breeding with their dogs. The pedigree for each dog often contains an indicator of how many fights the dog has won, whether the dog is a “Champion” or a “Grand Champion,” the breeding history of the dog in four generations, and indicators of the number of fights that dogs in their bloodline have won. There is also a field for “Breeder” and “Owner.” Some pedigrees have pictures of the dogs. Each pedigree has a unique six-digit number that appears in the webpage internet address for that particular dog.

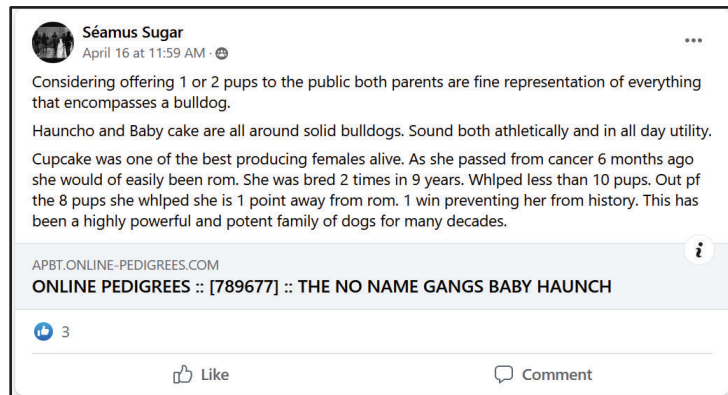
24. Dog fighters who maintain successful or high-potential fighting dogs do so for long periods of time so that they can continue to profit from those dogs from future dog fights or from selling offspring or breeding rights even after the dog retired from fighting or deceased. The more fights a dog wins, the higher that dog’s value, for either offspring, breeding, or sale to another dogfighter.

25. This criminal conduct often spans many years. For example, I am aware that agents in a separate investigation obtained evidence in a criminal investigation showing that one convicted defendant had raised a particular fighting dog named “Momba” from birth, matched her multiple times, and continued to breed her until she was nearly eleven years old, at which point she was seized as part of the investigation.

## PROBABLE CAUSE

### *A. Summary of Investigation*

26. Beginning in 2021, the United States initiated a criminal investigation of CO-CONSPIRATOR 1 for federal offenses related to dogfighting.<sup>5</sup> Law enforcement identified two Facebook accounts associated with CO-CONSPIRATOR 1. On May 27, 2022, this Court issued search warrants for both of CO-CONSPIRATOR 1's Facebook accounts. The records produced by Facebook in response to those warrants contain evidence of both ELLIOTT as well as CO-CONSPIRATOR 1's involvement in dogfighting. For example, in April 2022, CO-CONSPIRATOR 1's Facebook account posted an announcement, "offering 1 or 2 pups to the public both parents are fine representation of everything that encompasses a bulldog." The post identifies the kennel name associated with the dog as "The No Name Gang," which I believe to be name for a partnership CO-CONSPIRATOR 1 and ELLIOTT established to possess and breed dogs for dogfighting. A screenshot of the posts appears below:




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<sup>5</sup> CO-CONSPIRATOR 1 pleaded guilty in the U.S. District Court for the District of Massachusetts to possessing animals for use in an animal fighting venture and was later sentenced to prison.

27. In June 2023, federal agents and state troopers executed the federal search warrant at CO-CONSPIRATOR 1's residence resulting in the seizure of pit bull-type dogs and substantial additional evidence of federal offenses related to dogfighting. The additional evidence of dogfighting included, among other things, digital hanging scales, 50-lbs test weight, skin staplers, forceps, intravenous solution bags with lines and needles, breeding stand, break sticks with suspected blood in marring on the surface of the implements, veterinary medicines including wound care items, suspected steroids, dogfighting literature, and dog training equipment including treadmill-like items known as a carpet mill and a slat mill.

28. Agents also seized the cellular telephone used by CO-CONSPIRATOR 1. Analysis of the device revealed multiple dogfighting videos as well as significant content related to dogfighting generally. For example, agents located extensive WhatsApp message conversations between CO-CONSPIRATOR 1 and ELLIOTT, using a WhatsApp account with a contact name of "Cory Elliot." Their conversations centered around dogfighting. Messages sent between March 2018 and June 2023, set forth in detail herein, show that ELLIOTT and CO-CONSPIRATOR 1 partnered in a dogfighting conspiracy for over five years.

29. ELLIOTT and CO-CONSPIRATOR-1 communicated constantly about dogfights, gambling, the possession, purchase, and sale of dogs for dogfighting, among other things. On multiple occasions, ELLIOTT and CO-CONSPIRATOR 1 discussed the results of specific dogfights. ELLIOTT and CO-CONSPIRATOR 1 repeatedly discussed a partnership between themselves for the purpose of possessing and breeding dogs for dogfighting. Based on the content of the messages and references to the specific kennel name, I believe ELLIOTT and CO-CONSPIRATOR 1 formed a business partnership using the kennel name of "The No Name Gang" in furtherance of their criminal conspiracy.

***B. The Dogfighting Conspiracy***

30. In March 2018, CO-CONSPIRATOR 1 identified ELLIOTT as his “partner” and discussed medication for dogs. Later in March 2018, CO-CONSPIRATOR 1 identified ELLIOTT as being on the “same team” and generally described them as close/partners with dogs, in response to ELLIOTT asking CO-CONSPIRATOR 1 for a dog. Later in March 2018, audio messages suggested ELLIOTT bought veterinary drugs for CO-CONSPIRATOR 1. After the purchase, CO-CONSPIRATOR 1 planned to pay ELLIOTT for the veterinary drugs.

31. In May 2018, CO-CONSPIRATOR 1 told ELLIOTT, “let’s try to get some rolls together” [dogs Holy Moly vs. Double]... “set up the box, let them get at it.” ELLIOTT responded, “... gunna have to bring a bag for Holy Moly.”

32. In May 2018, ELLIOTT described a plan to use his garage for dog housing and efforts made to conceal dogs housed outdoors from the view/access of the “dog officer” in a conversation with CO-CONSPIRATOR 1.

33. In June 2018, CO-CONSPIRATOR 1 stated he would give ELLIOTT a well-bred dog from a “real bad bitch” from a winning blood line to train/condition it as his first dog that ELLIOTT would train himself. CO-CONSPIRATOR 1 indicated that he would teach ELLIOTT how to do a keep, and stated “It’s your dog. Do whatever you want with it. You want to fucking shoot it, shoot it. You want to sell it, sell it...”

34. In June 2018, CO-CONSPIRATOR 1 asked ELLIOTT to bury a dog in ELLIOTT’s “back yard” to which ELLIOTT replied, “Yes of course.”

35. In July 2018, CO-CONSPIRATOR 1 asked ELLIOTT to host a “show.” CO-CONSPIRATOR 1 requested ELLIOTT purchase unscented Dove soap, a gallon of milk, and alcohol prior to coming to his house to which ELLIOTT responded with the thumbs up emoji. I

know soap and milk to be items used to clean dogs prior to a dogfight. In the following dates, ELLIOTT asked CO-CONSPIRATOR 1 if "... that bitch [dog] make it" and CO-CONSPIRATOR 1 later stated the dog is "gone."

36. In July 2018, ELLIOTT warned CO-CONSPIRATOR 1 by stating, "4 people got their yards taken today... Be careful out there."

37. In August 2018, ELLIOTT stated to CO-CONSPIRATOR 1, "[this dog] is going to be dead soon. I fucking hate this dog...then when you go out there and whack her, she screams. Like she's fucking being killed. So then I went outside with a stick and cracked the fuck out of her."

38. In August 2018, ELLIOTT stated he rolled a dog with another known subject from Massachusetts suspected of involvement in dogfighting. Later in August 2018, ELLIOTT stated he is "culling hard."

39. In October 2018, CO-CONSPIRATOR 1 described himself and ELLIOTT as partners and CO-CONSPIRATOR 1 indicated that CO-CONSPIRATOR 1 possessed a key to ELLIOTT's residence.

40. In January 2019, CO-CONSPIRATOR 1 told ELLIOTT they have to "roll" a dog "Little Bueler" to which ELLIOTT responded with his intent to purchase walls and carpet which I know to be materials used to construct dogfighting pits. ELLIOTT further stated he did not want another friend to see the materials.

41. In January 2019, ELLIOTT stated "I'll do whatever I have to, I want to learn how to do this" in conversation with CO-CONSPIRATOR 1 about keeps.

42. In March 2019, ELLIOTT stated “I want to ... kill this dog [a dog named “Samcro”]... I want to kill it, absolutely murder the dog” due to poor performance in training. CO-CONSPIRATOR 1 responded, “go ahead.”

43. In September 2019, ELLIOTT established a PedsOnline account and shared the username and password with CO-CONSPIRATOR 1. ELLIOTT indicated he paid for the subscription, based on my interpretation of the conversation.

44. In December 2019, ELLIOTT warned CO-CONSPIRATOR 1 of law enforcement action related to dogfighting in Louisiana by sharing a news article link. In response, CO-CONSPIRATOR 1 expressed concern to ELLIOTT about a dogfighting raid involving INDIVIDUAL-1’s kennel. In January 2020, CO-CONSPIRATOR 1 wanted to move a dog “Double” to ELLIOTT’s house in case INDIVIDUAL-1 turned out to be a “rat” and informed on CO-CONSPIRATOR 1.

45. In January 2020, ELLIOTT and CO-CONSPIRATOR 1 discussed a dogfight. Later in January 2020, ELLIOTT discussed training dogs for dogfighting with CO-CONSPIRATOR 1.

46. In April 2020, ELLIOTT stated that he wanted to roll a female dog against a dog “Double” and later stated that a dog “Sombrita” is “crippled.” Later in April 2020, ELLIOTT described “beating the shit out of” multiple dogs and “the one dog I hate in this house, like I could fucking kill dude, is Puddles. I could smash that dog’s head and go eat a bowl of fucking spaghetti right after with meatballs and it wouldn’t even bother me... it don’t matter how many times you hit her, she keeps going...”

47. In April 2020, ELLIOTT discussed pouring concrete for outdoor kennels. ELLIOTT also discussed logistics for a planned dogfight and expressed concern over certain people being present at his house.

48. In April 2020, ELLIOTT asked CO-CONSPIRATOR 1 for help to “roll” two dogs.

49. In May 2020, ELLIOTT told CO-CONSPIRATOR 1 he used the fake name of “Tom Wade” to purchase a dog for \$2,000 in New York. Later in May 2020, ELLIOTT provided advice to CO-CONSPIRATOR 1 on avoiding apparent law enforcement scrutiny by advising against dogfighting titles (such as “Ch,” “2x,” “1x”) on posted pedigrees because “that’s what they [law enforcement] look for.”

50. In July 2020, ELLIOTT discussed dogfighting with CO-CONSPIRATOR 1 including a dog that is a “one-time loser” with a “bite like a motherfucker” that preferred to target the stifle (dog knee joint) and throat of other dogs.

51. In July 2020, ELLIOTT and CO-CONSPIRATOR 1 conversed about a plan to jointly purchase a “1xwinner” (one-time winner) for “2k” (\$2,000). In July 2020, ELLIOTT discussed the logistics of organizing a dogfight using coded language.

52. In July 2020, ELLIOTT suggested the use of a brand name tool storage and transport system as a “first aid kit” when he and CO-CONSPIRATOR 1 attend “shows.” Later in 2020, CO-CONSPIRATOR 1 told ELLIOTT that “we” can “roll” at a specific location to which ELLIOTT replied by discussing which dog(s) to bring.

53. In July 2020, ELLIOTT discussed a location for rolling or fighting dogs in stating, “Maybe my dog room we just have to move everyone and cleanup after” and stated he could “put the TV on if you want to bang them,” based on my interpretation of the conversation.

54. In August 2020, ELLIOTT and CO-CONSPIRATOR 1 discussed rolling a dog against a dog owned by “Mr. Savage” from Connecticut. Later in August 2020, ELLIOTT told CO-CONSPIRATOR 1 that 25 yards of construction aggregate material was delivered to

ELLIOTT's house for kennel construction from a construction company and discussed CO-CONSPIRATOR 1 assisting with construction of the kennels.

55. In August 2020, ELLIOTT stated to CO-CONSPIRATOR 1 that he tells girlfriend(s) he possesses many dogs because he helps dog rescue organizations house dogs.

56. In November 2020, ELLIOTT discussed the disposal of dog carcasses: "I just throw them [dead dogs] into the Boston Harbor now. When I'm at work, I just put them in the trash back and heave-ho, heave-ho them into the river." Based on information obtained during the investigation, I know that ELLIOTT worked or works at Boston Children's Hospital in Boston, Massachusetts.

57. In November 2020, ELLIOTT and CO-CONSPIRATOR 1 discussed the progress of ELLIOTT's trip in a rented van to Arkansas to obtain and transport four dogs back to ELLIOTT's residence. CO-CONSPIRATOR 1 and others constructed dog houses at ELLIOTT's residence to house the dogs from Arkansas. CO-CONSPIRATOR 1 sent ELLIOTT a picture of a completed doghouse and kennel at the SUBJECT PREMISES as appears below:



58. In December 2020, ELLIOTT and CO-CONSPIRATOR 1 discussed a dogfight with a “two-time winner” planned to occur in Maryland. ELLIOTT indicated that he planned to attend the dogfight; CO-CONSPIRATOR 1 did not plan to attend. CO-CONSPIRATOR 1 described one dog in saying “bitch can bite... I rolled her after that,” then “she killed her in 11 minutes.” ELLIOTT stated he would bet \$250 himself and \$250 for CO-CONSPIRATOR 1 on the dogfight. Based on later comments, I believe the discussed dogfight was canceled as result of a dog failing to meet the agreed upon weight, but another dogfight occurred that night.

59. In January 2021, ELLIOTT stated that he possessed 12 dogs at his house. Later in January 2021, ELLIOTT discussed a dogfight in stating “... that buckskin male was fucking killing

that red rednose – was in the throat, had him buried in the corner, and you know, hitting his throat and upper chest...”

60. In January 2023, ELLIOTT discussed culling dogs stating, “once I get settled in... we’ll go balls to the wall, we’ll just run everyone, who’s gonna make it - makes it, you know, we’ll dig a hole in the yard and fucking drop ‘em, you know, it’ll be good fertilizer.”

61. In January 2023, ELLIOTT told CO-CONSPIRATOR 1 he had the possibility of dating a woman employed by or associated with “PAWS New England” to which CO-CONSPIRATOR 1 cautioned ELLIOTT, “next thing you know, you would wake up to the MSPCA [Massachusetts Society for the Protection of Cruelty to Animals] surrounding your house.”

62. In January 2023, ELLIOTT stated “you sure you don’t want anything before I just hang them down stairs” in a discussion with CO-CONSPIRATOR 1 on breeding and culling. Later in January 2023, ELLIOTT described dogs, seemingly at his residence, as “killers” in conversation with CO-CONSPIRATOR 1. Later in January 2023, CO-CONSPIRATOR 1 sent ELLIOTT a video of a dogfight.

63. Based on the WhatsApp conversation between ELLIOTT and CO-CONSPIRATOR 1, I believe a dogfight occurred at ELLIOTT’s residence on Saturday, February 11, 2023. On February 3, 2023, ELLIOTT and CO-CONSPIRATOR 1 discussed plans for an event at “7:30” on “Saturday” after which ELLIOTT stated “Bring a shovel” which I believe could be a reference to burying deceased fighting dog(s).

64. On February 10, 2023, ELLIOTT planned for CO-CONSPIRATOR 1 to assist him and construct the “box” which I believe to mean a dogfighting pit. Later on February 10, 2023, CO-CONSPIRATOR 1 discussed which dogs he intended to bring. On the morning of February

11, 2023, ELLIOTT confirmed the time of the event with CO-CONSPIRATOR 1 who later discussed dogs and dog weights with ELLIOTT.

65. On February 11, 2023 at 6:38 p.m., ELLIOTT stated he will be home and instructed CO-CONSPIRATOR 1 to “head over” to which CO-CONSPIRATOR 1 replied “Ok bud I’ll leave here in 15.” Later on February 11, 2023 at 10:53 p.m., ELLIOTT reflected on the event, telling CO-CONSPIRATOR 1 that a male dog was “hitting that money spot”... “doesn’t have a scratch on him, but he’s a champ” which I believe to be describing the dogfight and confirming the status of the male dog as a champion (three-time winner). On the following day on February 12, 2023, ELLIOTT inquired as to the status of a dog in the possession of CO-CONSPIRATOR 1. In response, CO-CONSPIRATOR 1 stated, “Hes good. Just sore at ankle... He got bit good on his foot.”

66. On February 18, 2023, ELLIOTT suggested to CO-CONSPIRATOR 1 “let’s bang these guys” in an apparent discussion of fighting dogs and further stated, “It’s been awhile since we have seen a fatality like in mortal combat,” to which CO-CONSPIRATOR 1 stated, “Big head [dog] last 1.” ELLIOTT and CO-CONSPIRATOR 1 subsequently discussed a dog which displayed “killer instinct.”

67. On February 20, 2023, ELLIOTT stated to CO-CONSPIRATOR 1, “have him bring that dog, we just kill that dog, just kill it, man” about killing a dog for an unknown reason.

68. On February 24, 2023, CO-CONSPIRATOR 1 told ELLIOTT about the dogfighting prowess of certain dogs and provided gruesome details on dogs eating other dogs.

69. On February 28, 2023, ELLIOTT told CO-CONSPIRATOR 1, “*We* [emphasis added] going to have a good yard [of dogs] we got all the pieces” and then CO-CONSPIRATOR

1 told ELLIOTT, ““... *we* [emphasis added] have a two-time winner, a one-time winner, and a one-timer winner.”

70. On March 2, 2023, CO-CONSPIRATOR 1 sent ELLIOTT a video of himself wearing a white t-shirt and blue overalls fighting a dog in a dogfight between “Hannah” and “Holy Moley.”

71. On March 4, 2023, ELLIOTT asked CO-CONSPIRATOR 1 about a dog to which CO-CONSPIRATOR 1 replied “... she’s a killing machine... Killed everything she touched.”

72. On March 9, 2023, ELLIOTT and CO-CONSPIRATOR 1 discussed training dogs for dogfighting, based on interpretation of the conversation. ELLIOTT stated, “We should let some one kill it putt bbq sauce on its neck so they learn where to hit” which I believe means training a dog to bite a specific area on the body of another dog. Later on March 9, 2023, ELLIOTT discussed “starting” dogs and suggests they’ll fight when they get “hit.”

73. On March 13, 2023, CO-CONSPIRATOR 1 told ELLIOTT that an animal control officer came to the CO-CONSPIRATOR 1’s PREMISES. CO-CONSPIRATOR 1 indicated he feared his dogs would be siezed and stated, “I need my yard [of dogs] empty asap.” ELLIOTT and CO-CONSPIRATOR 1 confirmed they are a “team” and hatched a plot to move the dogs to another dogfighter’s house out of state. ELLIOTT indicated CO-CONSPIRATOR 1 could enter his house, using his key, to pickup crates to allow for the dogs to be transported. ELLIOTT stated he sent \$1,200 to CO-CONSPIRATOR 1’s wife/partner for “truck and wood and whate ever else” which I believe to be supplies to house dogs and \$500 to another dogfighter out of state via Cash App to prepare for the arrival of the dogs.

74. On March 14, 2023, ELLIOTT told CO-CONSPIRATOR 1: “drop ‘em in the fucking Boston Harbor again, fuck it, so something else can eat them.”

75. On March 17, 2023, ELLIOTT told CO-CONSPIRATOR 1, “If you get in trouble I’m fucked.”

76. On March 23, 2023, CO-CONSPIRATOR 1 cautioned ELLIOTT about disclosing information about dogfighting to girlfriend(s) to avoid scrutiny into their possession of dogs in saying “Just be careful exposing her to anything ate up” which I believe to mean dogs injured in dogfighting ventures. ELLIOTT responded, “Yup.” Later on March 23, 2023, ELLIOTT stated his plans to have 12-13 dogs between CO-CONSPIRATOR 1 and himself.

77. On March 25, 2023, CO-CONSPIRATOR 1 and ELLIOTT discussed the results of a dogfight.

78. On April 13, 2023, ELLIOTT told CO-CONSPIRATOR 1, “let’s get ready to roll these bastards... if that dude Rob wants to come he’s got to have that dog shut up, dude, I just can’t have that dog, that dog was super loud that night, you know, especially the weather is getting nice, people will have their windows open.” Later on April 13, 2023, CO-CONSPIRATOR 1 told ELLIOTT, “be careful, I don’t know if we can even roll, you know, your new MSPCA [Massachusetts Society for the Protection of Animal] wife is gunna get mad if we roll the dogs, bro, you got to be careful having banged up stuff [injured dogs] around the house.”

79. On May 1, 2023, ELLIOTT discussed with CO-CONSPIRATOR 1 a litter of puppies from an unintended breeding with a solution of “dig a hole, put ‘em in it.”

80. On May 7, 2023, ELLIOTT told CO-CONSPIRATOR 1 his plans to invite another dogfighter and CO-CONSPIRATOR 1 over next Saturday night to “bring over that male” which I believe may be an event to train or fight dogs at ELLIOTT’s residence.

81. On May 16, 2023, ELLIOTT told CO-CONSPIRATOR 1 about a disturbance he heard overnight in the area of his kennels likely at ELLIOTT’s residence and later stated “next

door is missing their dog.” Later ELLIOTT reported the neighbor’s dog was found deceased and “the face was mangled ... nose was torn off .. the whole face was fucking destroyed.” ELLIOTT stated that he believed his dog “Boo” may have caused the death of the neighbor’s dog during an unintended fight between dogs.

82. On May 16, 2023, CO-CONSPIRATOR 1 discussed the dogfighting activity of “Coach” who possesses two dogs that won in under 20 minutes “in the throat finishing killing motherfuckers” in a dogfight for \$10,000. ELLIOTT offered to pay \$1,500 and CO-CONSPIRATOR 1 will pay \$1,000 “so *we* [emphasis added] own the dog.” CO-CONSPIRATOR 1 further stated the dog “bit the shit out of him [likely another dog].”

83. On May 17, 2023, CO-CONSPIRATOR 1 told ELLIOTT, “*We* [emphasis added] are hooked at 38. 1k. 8 weeks. Get u the date...” which I believe means CO-CONSPIRATOR 1 and ELLIOTT agreed to fight a 38 lbs. dog against another 38 lbs. dog in 8 weeks for a \$1,000 wager.

84. On May 29, 2023, CO-CONSPIRATOR 1 urged ELLIOTT to use caution with sharing information on their activities with his girlfriend. CO-CONSPIRATOR 1 told ELLIOTT, “... if she is involved in [animal] rescue, you know, if she finds out anything about you, you’re going, dude, you know, you’re going, there’s no doubt about it, you’re in trouble... once she finds out, you’re done.”

***C. Video Evidence of ELLIOTT at a Dogfight***

85. On April 26, 2023, the District of Maine granted a search warrant for the Google Account of INDIVIDUAL-2 suspected to be involved in dogfighting.<sup>6</sup>

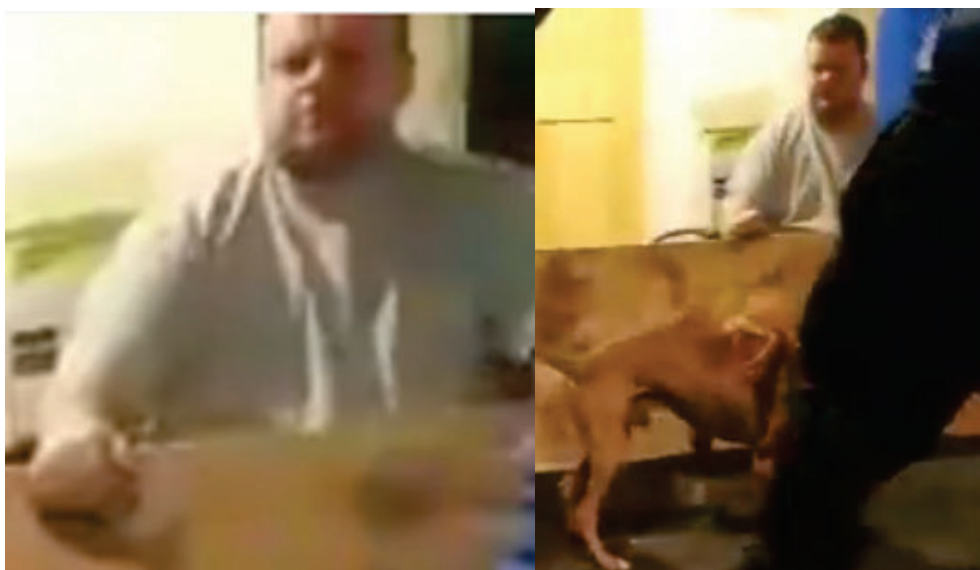
86. In my review of the Google Account, I observed a significant amount of content—in the form of photographs and videos depicting dogs fighting in apparent dogfighting events, dogs fighting in apparent training contents (“bumps” or “rolls”), and dogs with gruesome injuries including a dog eating the face of another dog.

87. Pertinent here, I also located a one-minute-and-six-second video of a dogfight with metadata for multiple dates in 2023.<sup>7</sup> During the video, a person I believe to be ELLIOTT based on my review of his driver’s license picture and personal interaction with him appears to be sitting at the dogfighting pit watching the dogfight. Screenshots from the video appear below as well as ELLIOTT’s Massachusetts RMV photo:

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<sup>6</sup> In June 2023, federal agents and state troopers executed a federal search warrant at INDIVIDUAL-2’s residence. Pursuant to the warrant, agents seized 16 pit bull-type dogs and dogfighting paraphernalia including a weighted collar, two treadmills, break sticks, and papers regarding frozen canine sperm constituting evidence of federal offenses related to dogfighting.

<sup>7</sup> At this time, I am not certain when the video was taken.





***D. Federal Search Warrant at CO-CONSPIRATOR-1's Residence***

88. In June 2023, federal agents and state troopers executed a federal search warrant at CO-CONSPIRATOR 1's residence resulting in the seizure of pit bull-type dogs and substantial additional evidence of federal offenses related to dogfighting. The additional evidence of dogfighting included, among other things, digital hanging scales, 50-lbs test weight, skin staplers, forceps, intravenous solution bags with lines and needles, breeding stand, break sticks with suspected blood in marring on the surface of the implements, veterinary medicines including wound care items, suspected steroids, dogfighting literature, and dog training equipment including treadmill-like items known as a carpet mill and a slat mill.

**2025 Aerial Surveillance of ELLIOTT's Residence**

89. On April 14, 2025, a law enforcement helicopter conducted aerial surveillance of ELLIOTT's residence. Surveillance documented an apparent dog within an enclosure behind the

garage, pictured below:



90. In the rear of ELLIOTT's residence, surveillance documented a kennel with approximately five structures that appeared to be doghouses based on the size, shape, and proximity to the dogs. Within the enclosure, at least three pit bull-type dogs appeared to be on the roof of dog houses. The pit bull-type dogs documented at the ELLIOTT residence by surveillance were the appropriate breed, size, and color of dogs possessed for the purpose of dogfighting. The pit bull-type dogs documented at the ELLIOTT residence by surveillance were housed in a manner consistent with dogs kept for the purpose of dogfighting by segregating the dogs in a way that prevents physical contact between dogs and enclosing the kennels with a stockade privacy fence to limit the visibility of the dogs. The aerial surveillance images below show the kennels in the rear of the ELLIOTT residence:



**Federal Search Warrant at ELLIOTT's Residence**

91. On June 25, 2025, agents executed a federal search warrant at ELLIOTT'S residence in Carver, Massachusetts. Four pit bull-type dogs were seized from the outdoor kennel area at the back of the property. Three of the seized dogs had scarring on their muzzles, legs, heads, and ears consistent with dog fighting. Dog pedigrees, dog harnesses, leashes, syringes, veterinary medications (including injectable de-wormer) were seized. The agents also found two ring apparatuses attached to the basement rafters and a treadmill with dog hair inside the ELLIOTT residence.

**CONCLUSION**

92. Based on the foregoing, probable cause exists to show that from on or about March 2018, through on or about June 2023, in the District of Massachusetts and elsewhere, ELLIOTT conspired with CO-CONSPIRATOR 1 and with others known and unknown to commit the TARGET OFFENSE.

I declare that the foregoing is true and correct.

*Christopher Robinson* <sup>DLC</sup>  
ASAC Christopher Robinson  
Office of Inspector General  
U.S. Department of Agriculture

Sworn via telephone in accordance with Federal Rule of Criminal Procedure 4.1

on April 13, 2026.

  
HONORABLE DONALD L. CABELL  
Chief United States Magistrate Judge

