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FILED
NOV 05 2026
Honorable
Janine M. Allen, J.S.C.

STATE OF NEW JERSEY

v.

JOSHUA R. CIEMNIECKI,
KAILA M. MCNEILL,
FRANCIS CIEMNIECKI,
CYNTHIA CIEMNIECKI, and
ROBERT CIEMNIECKI,

Defendants.

LAW DIVISION - SUSSEX COUNTY
SUPERIOR COURT OF NEW JERSEY

Indictment No. 26-11-00287 I

CRIMINAL ACTION

COUNT ONE

The Grand Jurors of the State of New Jersey, for the County of Sussex, upon their oaths present that JOSHUA R. CIEMNIECKI, on or about March 16, 2026, in the Townships of Stillwater, Wantage, and Lafayette, County of Sussex, and within the jurisdiction of this Court, as the owner or a person otherwise charged with the care of a living animal or creature, knowingly, purposely or recklessly did cause bodily injury to a living animal by failing to provide the living animal with necessary care, specifically by taking possession of over 40 dogs which were held in wire cages not meant for transport, driving them throughout the County of Sussex, and abandoning said cages at various locations without providing food, water, security, or proper shelter, many being older animals, which were all subjected to extremely adverse weather conditions and predators, thereby causing death to five (5) of the dogs, contrary to the provisions of N.J.S.A. 4:22-17(c)(2) and against the peace of this State, the government and dignity of the same. (A Crime of the Third Degree)

COUNT TWO

The Grand Jurors of the State of New Jersey, for the County of Sussex, upon their oaths present that JOSHUA R. CIEMNIECKI, on or about March 16, 2026, in the Townships of Stillwater, Wantage, and Lafayette, County of Sussex, and within the jurisdiction of this Court, as the owner or a person otherwise charged with the care of a living animal or creature, knowingly, purposely or recklessly did cause bodily injury to a living animal by failing to provide the living animal with necessary care, specifically by taking possession of over 40 dogs which were held in wire cages not meant for transport, driving them throughout the County of Sussex, and abandoning said cages at various locations without providing food, water, security, or proper shelter, many being older animals, which were all subjected to extremely adverse weather conditions and predators, thereby placing them in extreme risk of serious injury and/or death, contrary to the provisions of N.J.S.A. 4:22-17(c)(2) and against the peace of this State, the government and dignity of the same. (A Crime of the Fourth Degree)

COUNT THREE

The Grand Jurors of the State of New Jersey, for the County of Sussex, upon their oaths present that KAILA M. MCNEILL, on or about March 16, 2026, in the Townships of Stillwater, Wantage, and Lafayette, County of Sussex, and within the jurisdiction of this Court, as the owner or a person otherwise charged with the care of a living animal or creature, knowingly, purposely or recklessly did cause bodily injury to a living animal by failing to provide the living animal with necessary care, specifically by taking possession of over 40 dogs which were held in wire cages not meant for transport, driving them throughout the County of Sussex, and abandoning said cages

at various locations without providing food, water, security, or proper shelter, many being older animals, which were all subjected to extremely adverse weather conditions and predators, thereby causing death to 5 of the dogs, contrary to the provisions of N.J.S.A. 4:22-17(c)(2) and against the peace of this State, the government and dignity of the same. (A Crime of the Third Degree)

COUNT FOUR

The Grand Jurors of the State of New Jersey, for the County of Sussex, upon their oaths present that KAILA M. MCNEILL, on or about March 16, 2026, in the Townships of Stillwater, Wantage, and Lafayette, County of Sussex, and within the jurisdiction of this Court, as the owner or a person otherwise charged with the care of a living animal or creature, knowingly, purposely or recklessly did cause bodily injury to a living animal by failing to provide the living animal with necessary care, specifically by taking possession of over 40 dogs which were held in wire cages not meant for transport, driving them throughout the County of Sussex, and abandoning said cages at various locations without providing food water, security, or proper shelter, many being older animals, which were all subjected to extremely adverse weather conditions and predators, thereby placing them in extreme risk of serious injury and/or death, contrary to the provisions of N.J.S.A. 4:22-17(c)(2) and against the peace of this State, the government and dignity of the same. (A Crime of the Fourth Degree)

COUNT FIVE

The Grand Jurors of the State of New Jersey, for the County of Sussex, upon their oaths present that JOSHUA R. CIEMNIECKI, KAILA M. MCNEILL, FRANCIS CIEMNIECKI, CYNTHIA CIEMNIECKI, and ROBERT CIEMNIECKI, on or about March 16, 2026, in the Counties of Sussex and Warren, with the purpose of promoting or facilitating the commission of the crime of Animal Cruelty, a third degree crime, agreed with such other person or persons that they or one or more of them would engage in conduct which constitutes such crime or an attempt or solicitation to commit such crime; or agreed to aid such other person or persons in the planning or commission of such crime or of an attempt or solicitation to commit such crime, resulting in the deaths of five (5) dogs, contrary to the provisions of N.J.S.A. 2C:5-2 and 4:22-17(c)(2) and against the peace of this State, the government and dignity of the same. (A Crime of the Third Degree)

OVERT ACTS

The Grand Jurors aforesaid, upon their oaths, do further present that in pursuance of the said conspiracy, the following OVERT ACTS, among others, were committed by each of the defendants:

1. JOSHUA R. CIEMNIECKI and ROBERT CIEMNIECKI loaded dogs into a Dodge Durango and transported those dogs to various locations in Sussex County so that they could be abandoned without providing food, water, security, or proper shelter during brutally cold and adverse weather conditions;
2. JOSHUA R. CIEMNIECKI drove the Dodge Durango to various locations throughout Sussex County, including the Townships of Stillwater, Wantage, and Lafayette, where he

abandoned dogs without providing food, water, security, or proper shelter during brutally cold and adverse weather conditions;

3. KAYLA M. MCNEILL drove the rented U-Haul van to various locations throughout Sussex County, including the Townships of Stillwater, Wantage, and Lafayette, where she abandoned dogs without providing food, water, security, or proper shelter during brutally cold and adverse weather conditions;
4. FRANCIS CIEMNIECKI paid for the rented U-Haul van which KAILA M. MCNEILL drove, and further provided gas money to KAILA M. MCNEILL for the rented U-Haul van, thereby promoting or facilitating the scheme to transport the dogs so that they could be abandoned at various locations without providing food, water, security or proper shelter during brutally cold and adverse weather conditions;
5. KAILA M. MCNEILL observed that the U-Haul rental van had windows that needed to be covered up, and enlisted CYNTHIA CIEMNIECKI to provide tape and other supplies to cover the windows in the rented U-Haul van;
6. CYNTHIA CIEMNIECKI provided tape and other supplies to KAILA M. MCNEILL so that the rented U-Haul van's windows could be covered, thereby promoting or facilitating the scheme to transport the dogs so that they could be abandoned at various locations without providing food, water, security or proper shelter during brutally cold and adverse weather conditions; and
7. CYNTHIA CIEMNIECKI directed KAILA M. MCNEILL and JOSHUA R. CIEMNIECKI to drive to various locations including Warren County, New Jersey,

Sussex County, New Jersey, and Pennsylvania to abandon dogs at those locations without providing food, water, security, or proper shelter during brutally cold and adverse weather conditions.

COUNT SIX

The Grand Jurors of the State of New Jersey, for the County of Sussex, upon their oaths present that JOSHUA R. CIEMNIECKI, KAILA M. MCNEILL, FRANCIS CIEMNIECKI, CYNTHIA CIEMNIECKI, and ROBERT CIEMNIECKI, on or about March 16, 2026, in the Counties of Sussex and Warren, with the purpose of promoting or facilitating the commission of the crime of Animal Cruelty, a fourth degree crime, agreed with other person or persons that they or one or more of them would engage in conduct which constitutes such crime or an attempt or solicitation to commit such crime; or agreed to aid such other person or persons in the planning or commission of such crime or of an attempt or solicitation to commit such crime, resulting in bodily injury to one or more dogs, contrary to the provisions of N.J.S.A. 2C:5-2 and 4:22-17(c)(2) and against the peace of this State, the government and dignity of the same. (A Crime of the Fourth Degree)

OVERT ACTS

The Grand Jurors aforesaid, upon their oaths, do further present that in pursuance of the said conspiracy, the following OVERT ACTS, among others, were committed by each of the defendants:

1. JOSHUA R. CIEMNIECKI and ROBERT CIEMNIECKI loaded dogs into a Dodge Durango to transport those dogs to various locations in Sussex County so that they could

be abandoned without providing food, water, security, or proper shelter during brutally cold and adverse weather conditions;

2. JOSHUA R. CIEMNIECKI drove the Dodge Durango to various locations throughout Sussex County, including the Townships of Stillwater, Wantage, and Lafayette, where he abandoned dogs without providing food, water, security, or proper shelter during brutally cold and adverse weather conditions;
3. KAYLA M. MCNEILL drove the rented U-Haul van to various locations throughout Sussex County, including the Townships of Stillwater, Wantage, and Lafayette, where she abandoned dogs without providing food, water, security, or proper shelter during brutally cold and adverse weather conditions;
4. FRANCIS CIEMNIECKI paid for the rented U-Haul van which KAILA M. MCNEILL drove, and further provided gas money to KAILA M. MCNEILL for the rented U-Haul van, thereby promoting or facilitating the scheme to transport the dogs so that they could be abandoned at various locations without providing food, water, security or proper shelter during brutally cold and adverse weather conditions;
5. KAILA M. MCNEILL observed that the U-Haul rental van had windows that needed to be covered up, and enlisted CYNTHIA CIEMNIECKI to provide tape and other supplies to cover the windows in the rented U-Haul van;
6. CYNTHIA CIEMNIECKI provided tape and other supplies to KAILA M. MCNEILL so that the rented U-Haul van's windows could be covered, thereby promoting or facilitating the scheme to transport the dogs so that they could be abandoned at various

locations without providing food, water, security or proper shelter during brutally cold and adverse weather conditions; and

7. CYNTHIA CIEMNIECKI directed KAILA M. MCNEILL and JOSHUA R. CIEMNIECKI to drive to various locations including Warren County, New Jersey, Sussex County, New Jersey, and Pennsylvania to abandon dogs at those locations without providing food, water, security, or proper shelter during brutally cold and adverse weather conditions.

COUNT SEVEN

The Grand Jurors of the State of New Jersey, for the County of Sussex, upon their oaths present that CYNTHIA CIEMNIECKI and KAILA M. MCNEILL, on or about March 16, 2026, in the Counties of Sussex and Warren, and within the jurisdiction of this Court, did conspire with one another with the purpose of promoting or facilitating the commission of the crime of Tampering with Evidence, a fourth degree crime, agreeing that KAILA M. MCNEILL would engage in conduct which constitutes such crime or an attempt or solicitation to commit such crime, by altering, destroying, concealing or removing an article, object, record, document or thing of physical substance, with purpose to impair its verity or availability in such proceeding or investigation, contrary to the provisions of N.J.S.A. 2C:5-2 and 2C:28-6(1) and against the peace of this State, the government and dignity of the same. (A Crime of the Fourth Degree)

OVERT ACTS

The Grand Jurors aforesaid, upon their oaths, do further present that in pursuance of the said conspiracy, the following OVERT ACTS were committed:

1. CYNTHIA CIEMNIECKI and KAILA M. MCNEILL both believed an official proceeding or investigation was pending or about to be instituted. Among other things, KAILA M. MCNEILL texted CYNTHIA CIEMNIECKI on March 16, 2026, in sum and substance, "M gunna go to jail."
2. KAILA M. MCNEILL texted a video to CYNTHIA CIEMNIECKI that depicted a rural road and parking area where she drove the rented U-Haul van. On the video, dogs could be heard barking inside the U-Haul van. It is unknown whether dogs were abandoned at that particular location.
3. After CYNTHIA CIEMNIECKI received the video from KAILA M. MCNEILL, CYNTHIA CIEMNIECKI texted KAILA M. MCNEILL, in sum or substance, "Delete the video."
4. KAILA M. MCNEILL deleted the video.

COUNT EIGHT

The Grand Jurors of the State of New Jersey, for the County of Sussex, upon their oaths present that KAILA M. MCNEILL, on or about March 16, 2026, in the Counties of Sussex and Warren, and within the jurisdiction of this Court, believing that an official proceeding or investigation was pending or about to be instituted, purposely altered, destroyed, concealed or removed an object, article, record, document, or other thing of physical substance, with purpose to impair its verity or availability in such proceeding or investigation, by deleting cellphone video and audio evidence of a rural road and parking area that captured the U-Haul with barking dogs

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inside, contrary to the provisions of N.J.S.A. 2C:28-6(1) and against the peace of this State, the government and dignity of the same. (A Crime of the Fourth Degree)

DANIEL M. PEREZ,
Sussex County Prosecutor

By: [redacted]
Karen A. Lodeserto
Supervising Assistant Prosecutor

A True Bill:

[redacted]
Foreperson

26-176