

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No.
	:	
JASON ARTEAGA-LOAYZA,	:	18 U.S.C. § 371,
a/k/a “JUICE”	:	21 U.S.C. §§ 841(a)(1) and
	:	(b)(1)(C)

INFORMATION

The defendant having waived in open court prosecution by Indictment, the Acting United States Attorney for the District of New Jersey charges:

COUNT ONE

(Conspiracy to Defraud the United States Bureau of Prisons)

BACKGROUND

1. Defendant JASON ARTEAGA-LOAYZA, a/k/a “JUICE” (“ARTEAGA-LOAYZA”) was an inmate at Federal Correctional Institution Fort Dix (“Fort Dix”) from on or about June 21, 2017 to on or about September 20, 2018. Following his release from Fort Dix, ARTEAGA-LOAYZA resided at a halfway house in Newark, New Jersey until in or about December 2018, and then moved to a residence in Jersey City, New Jersey.
2. At all times relevant to Count One of this Information:
 - a. Fort Dix was a low-security federal prison within the United States Bureau of Prisons (the “BOP”) located in Burlington County, New Jersey.
 - b. Adrian Goolcharran, a/k/a “Adrian Ahoda,” a/k/a “Adrian Ajoda,” a/k/a Adrian Ajodha” (“Goolcharran”), a resident of Union City, New Jersey, was an associate of ARTEAGA-LOAYZA.

c. Nicolo Denichilo, a resident of Jersey City, New Jersey, was an associate of Goolcharran.

d. Johansel Moronta, an inmate at Fort Dix from on or about April 10, 2018 to on or about March 14, 2019, was an associate of ARTEAGA-LOAYZA.

THE CONSPIRACY

3. From at least in or about October 2018 to in or about June 2019, in the District of New Jersey, and elsewhere, defendant

JASON ARTEAGA-LOAYZA, a/k/a "JUICE"

and others, did knowingly and intentionally combine, conspire, confederate and agree to defraud the BOP by impeding, impairing, and obstructing the BOP's lawful and legitimate function to maintain the order, discipline, and security of federal prisons, including Fort Dix.

OBJECT OF THE CONSPIRACY

4. It was the object of the conspiracy for ARTEAGA-LOAYZA and others to evade through trickery and device the BOP's security procedures in order to smuggle contraband into Fort Dix, where it was sold to inmates for a profit.

MANNER AND MEANS

5. It was part of the conspiracy that:

a. Defendant ARTEAGA-LOAYZA, Goolcharran, Denichilo, Moronta, and others used unmanned aerial vehicles, or drones, to smuggle contraband into Fort Dix. On multiple occasions from at least in or about

October 2018 to at least in or about April 2019, ARTEAGA-LOAYZA arranged for Goolcharran, with Denichilo's assistance, to fly drones over Fort Dix and drop packages containing cell phones, cell phone accessories, tobacco, weight loss supplements, eye glasses, and other materials into the prison. Several of the drone drops, including contraband dropped on or about October 30, 2018 and on or about April 16, 2019, were intercepted by BOP officials, but not all of the packages were successfully intercepted.

b. ARTEAGA-LOAYZA and his co-conspirators attempted to evade BOP officials by trickery and deception. For example, ARTEAGA-LOAYZA and his co-conspirators planned drone drops in the evening or overnight, when it was dark outside, and the drones were less likely to be seen. The lights on the drones were covered with black tape to make the drones even more difficult to detect. Goolcharran, the drone pilot, with Denichilo's assistance, flew the contraband in from concealed positions in the woods near Fort Dix. In some cases, Goolcharran dropped the contraband on the rooftop of a housing unit that Moronta accessed by subverting the lock on the hatch leading to the rooftop. When there was too much contraband for the drone to carry in one trip, Goolcharran flew multiple trips using the drone.

c. ARTEAGA-LOAYZA, after he was released from Fort Dix, coordinated the drone drops into Fort Dix with Goolcharran, Moronta, and others, including by telephone calls and text messages using, in part, cell phones at Fort Dix that were concealed from detection.

d. ARTEAGA-LOAYZA, with Moronta's assistance inside of Fort Dix, took inmate requests for specific items of contraband and oversaw the collection of payments in exchange for the contraband.

e. ARTEAGA-LOAYZA procured contraband for Fort Dix inmates and stored contraband at his residence in Jersey City through on or about June 27, 2019.

OVERT ACTS

6. In furtherance of the conspiracy and to effect its object, the following overt acts were committed in the District of New Jersey and elsewhere:

a. On or about October 21, 2018, ARTEAGA-LOAYZA received text messages from Moronta (all text messages are reproduced in their original form, without modification to spelling or typographical errors) regarding Moronta's efforts inside of Fort Dix to organize the receipt and distribution of the contraband that they were planning to smuggle into Fort Dix, to include:

Overt Act	From	To	Approximate Time	Message
i	Moronta	ARTEAGA-LOAYZA	5:21 p.m.	Text me everything that coming in there please
ii	Moronta	ARTEAGA-LOAYZA	5:21 p.m.	And ask him how many trip?

b. In the early morning hours on or about October 24, 2018, in Burlington County, New Jersey, Goolcharran flew a drone containing contraband into Fort Dix (the "October 24, 2018 drone drop").

c. In the days leading up to the October 24, 2018 drone drop, ARTEAGA-LOAYZA, Moronta, who was then an inmate at Fort Dix, and Goolcharran sent multiple text messages to coordinate the drone drop, to include:

October 23, 2018 Communications Between ARTEAGA-LOAYZA and Moronta Regarding the October 24, 2018 Drone Drop

Overt Act	From	To	Approximate Time	Message
i	Moronta	ARTEAGA-LOAYZA	4:53 p.m.	We on tonight ?
ii	Moronta	ARTEAGA-LOAYZA	4:56 p.m.	What u say ?
iii	ARTEAGA-LOAYZA	Moronta	4:56 p.m.	don't tell no one
iv	Moronta	ARTEAGA-LOAYZA	4:57 p.m.	Ok
v	Moronta	ARTEAGA-LOAYZA	4:57 p.m.	I won't

October 24, 2018 Communications Between ARTEAGA-LOAYZA, Goolcharran, and Moronta Regarding the October 24, 2018 Drone Drop

Overt Act	From	To	Approximate Time	Message/Phone Call (Approximate Length)
vi	ARTEAGA-LOAYZA	Moronta	12:35 a.m.	call me as soon as count clears
vii	Moronta	ARTEAGA-LOAYZA	12:40 a.m.	Phone Call (49 sec.)
viii	Moronta	Goolcharran	12:44 a.m.	Yo I am about to pop the door
ix	Moronta	Goolcharran	12:45 a.m.	Waiting for count to leave the other building
x	Moronta	Goolcharran	12:45 a.m.	How many trip we doing tonight
xi	Goolcharran	Moronta	12:45 a.m.	3
xii	Moronta	Goolcharran	12:55 a.m.	Ok about to open the door

d. On or about October 26, 2018, ARTEAGA-LOAYZA and Moronta text messaged each other about the distribution of contraband and collection of profits:

Overt Act	From	To	Approximate Time	Message
i	Moronta	ARTEAGA-LOAYZA	1:11 p.m.	How much are the j3
ii	Moronta	ARTEAGA-LOAYZA	1:11 p.m.	Right now in the street
iii	ARTEAGA-LOAYZA	Moronta	1:13 p.m.	Like 200
iv	ARTEAGA-LOAYZA	Moronta	1:13 p.m.	Why
v	Moronta	ARTEAGA-LOAYZA	1:22 p.m.	He saying he can pay the 10 bands
vi	Moronta	ARTEAGA-LOAYZA	1:23 p.m.	But he don't want to pay the 500 on each phone
vii	Moronta	ARTEAGA-LOAYZA	1:23 p.m.	To send in here
viii	Moronta	ARTEAGA-LOAYZA	1:23 p.m.	He will buy the phone and the baco
ix	Moronta	ARTEAGA-LOAYZA	1:23 p.m.	What u want to do
x	ARTEAGA-LOAYZA	Moronta	1:24 p.m.	Nah
xi	Moronta	ARTEAGA-LOAYZA	1:24 p.m.	Ok
xii	Moronta	ARTEAGA-LOAYZA	1:56 p.m.	Ok so I am tell him 10 phones and 100 baco he has to pay 10 bands and 500 on each phone ?
xiii	ARTEAGA-LOAYZA	Moronta	1:58 p.m.	5 Gomes
xiv	ARTEAGA-LOAYZA	Moronta	1:58 p.m.	Fones
xv	Moronta	ARTEAGA-LOAYZA	1:58 p.m.	Ok I will tell him about it
xvi	Moronta	ARTEAGA-LOAYZA	1:59 p.m.	See what he say
xvii	ARTEAGA-LOAYZA	Moronta	2:03 p.m.	K
xviii	ARTEAGA-LOAYZA	Moronta	2:03 p.m.	With the chargers

Overt Act	From	To	Approximate Time	Message
xix	ARTEAGA-LOAYZA	Moronta	2:03 p.m.	And well even give him an ounce of weed tell him

e. In the early morning hours on or about October 30, 2018, in Burlington County, New Jersey, Goolcharran used a drone to drop a package containing approximately 127 bags of Bugler tobacco, approximately 10 cell phone chargers, and approximately 10 USB charging cables into Fort Dix (the “October 30, 2018 drone drop”).

f. On or about October 30, 2018, Moronta went to the rooftop area of the housing unit in Fort Dix where Goolcharran was dropping the package to receive the contraband.

g. On or about October 30, 2018, ARTEAGA-LOAYZA, Moronta, and Goolcharran had the following communications to coordinate the October 30, 2018 drone drop:

Overt Act	From	To	Approximate Time	Message
i	Moronta	Goolcharran	12:07 a.m.	Ok I am seeing who getting here
ii	Moronta	Goolcharran	12:07 a.m.	U in the area
iii	Goolcharran	Moronta	12:07 a.m.	Yea
iv	Moronta	Goolcharran	12:07 a.m.	Ok
v	ARTEAGA-LOAYZA	Moronta	12:28 a.m.	they switched?
vi	Moronta	ARTEAGA-LOAYZA	12:28 a.m.	Yes it bad
vii	ARTEAGA-LOAYZA	Moronta	12:28 a.m.	who
viii	Moronta	ARTEAGA-LOAYZA	12:30 a.m.	Idk wait
ix	Goolcharran	Moronta	12:36 a.m.	How we lookin

Overt Act	From	To	Approximate Time	Message
x	Moronta	Goolcharran	12:42 a.m.	It ok
xi	Moronta	ARTEAGA-LOAYZA	12:57 a.m.	It to trip
xii	Moronta	ARTEAGA-LOAYZA	12:57 a.m.	Two trip

h. On or about April 22, 2019, ARTEAGA-LOAYZA and Goolcharran text messaged each other about where in Fort Dix to drop the contraband as described below:

Overt Act	From	To	Approximate Time	Message
i	ARTEAGA-LOAYZA	Goolcharran	11:49 a.m.	U got the pics send them to me.
ii	Goolcharran	ARTEAGA-LOAYZA	11:50 a.m.	[Sending an aerial photo of Fort Dix]
iii	ARTEAGA-LOAYZA	Goolcharran	11:52 a.m.	[Responding with the same photo of Fort Dix marked with a long yellow line and a short yellow line]
iv	ARTEAGA-LOAYZA	Goolcharran	11:53 a.m.	Behind the building where the yellow is the long yellow line is a fence.
v	Goolcharran	ARTEAGA-LOAYZA	11:53 a.m.	[Sending another aerial photo of Fort Dix with orange target marks over several housing units]
vi	ARTEAGA-LOAYZA	Goolcharran	12:01 p.m.	[Responding with the same photo marked with a black dot behind a particular housing unit]
vii	ARTEAGA-LOAYZA	Goolcharran	12:01 p.m.	Black dot

i. On or about April 26, 2019, ARTEAGA-LOAYZA and Goolcharran text messaged each other about a potential drone drop as described below:

Overt Act	From	To	Approximate Time	Message
i	ARTEAGA-LOAYZA	Goolcharran	11:05 a.m.	U think that u cud do something 2m
ii	Goolcharran	ARTEAGA-LOAYZA	11:06 a.m.	2m too windy 20mph

In violation of Title 18, United States Code, Section 371.

COUNT TWO

(Possession of Narcotics With Intent to Distribute)

1. Paragraph 1 of Count 1 of this Information is repeated and realleged as if fully set forth herein.
2. On or about June 27, 2019, in the District of New Jersey and elsewhere, defendant

JASON ARTEAGA-LOAYZA, a/k/a "JUICE,"

did knowingly and intentionally possess with the intent to distribute approximately 21 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl (N-phenyl-N-[1-(2- phenylethyl)-4-piperidinyl] Propanamide), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).



RACHAEL A. HONIG
Acting United States Attorney

CASE NUMBER: _____

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UNITED STATES OF AMERICA

v.

JASON ARTEAGA-LOAYZA

**INFORMATION FOR
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21 U.S.C. §§ 841(a)(1)
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