

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA :
v. : Hon. Michael A. Hammer
PAUL ANTON WRIGHT : Mag. No. 18-4094 (MAH)
: **CRIMINAL COMPLAINT**

I, Christopher M. Prout, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the U.S. Department of Justice, Office of the Inspector General ("DOJ-OIG"), and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.



Christopher M. Prout
Special Agent
U.S. Department of Justice,
Office of the Inspector General

Sworn to before me, and subscribed in my presence
on the 12 day of April, 2018
at Newark, New Jersey

HONORABLE MICHAEL A. HAMMER
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

From in or about February 2015 to in or about December 2015, in Burlington County, in the District of New Jersey, and elsewhere, defendant

PAUL ANTON WRIGHT

being an employee of the Federal Bureau of Prisons, directly and indirectly, did corruptly demand, seek, receive, accept, and agree to receive and accept things of value personally, namely United States currency, in return for (A) being influenced in the performance of official acts; (B) being influenced to commit and aid in committing, and to collude in, and allow, a fraud, and make an opportunity for the commission of a fraud, on the United States; and (C) being induced to do and omit to do acts in violation of his official duties.

In violation of Title 18, United States Code, Sections 201(b)(2)(A), (B), and (C), and Section 2.

ATTACHMENT B

I, Christopher M. Prout, am a Special Agent with the United States Department of Justice, Office of the Inspector General. I have personally participated in this investigation and am aware of the facts contained herein based upon my own participation in this investigation, interviews and briefings with other law enforcement officers and interviews of witnesses. I also have reviewed publicly-available documents and reports, and other evidence, including telephone toll records, cell-site data, bank records, and casino records. Because this complaint is being submitted for the limited purpose of establishing probable cause, I have not set forth herein each and every fact that I know concerning this investigation. Where I refer to statements of others, those statements have been related in substance and in part, unless otherwise noted. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged. All referenced times are approximate and refer to Eastern Time.

1. At times relevant to this complaint:
 - a. Defendant PAUL ANTON WRIGHT ("WRIGHT") was a Correctional Officer at the Federal Correctional Institution Fort Dix ("FCI Fort Dix"). WRIGHT utilized a cellular telephone (the "Wright Facility"), and WRIGHT resided in Berlin, New Jersey.
 - b. The Federal Bureau of Prisons ("BOP") was an agency of the United States government within the United States Department of Justice responsible for confining federal offenders in prisons and community-based facilities. FCI Fort Dix was a low-security BOP facility for male offenders located in Burlington County, New Jersey on the Fort Dix/McGuire Air Force Base military installation.
 - c. Federal inmates housed at FCI Fort Dix were prohibited from possessing contraband in the facility. The prison's Admission and Orientation Inmate Handbook (the "handbook") specifically defined "contraband" as any item or thing not authorized or issued by the institution, not received through appropriate channels, not purchased through the commissary, or used for unauthorized purposes. The handbook notified inmates that drugs were prohibited within the prison and that it was a tobacco/smoke-free facility.
 - d. Correctional officers employed by the BOP at FCI Fort Dix were required, as part of their official duties, to ensure that

the inmates followed the established rules at the prison, including the prohibition against possessing contraband.

- e. CW-1 was an inmate at FCI Fort Dix. CW-1 has cooperated with law enforcement in the hopes of obtaining a more favorable outcome with respect to his federal sentence.
- f. Inmate 1 was an inmate at FCI Fort Dix.
- g. Individual 1 was a relative of Inmate 1. Individual 1 used a cellular telephone (the “Individual 1 Facility”).
- h. Inmate 2 was an inmate at FCI Fort Dix.
- i. CW-2 was a relative of Inmate 2’s girlfriend. CW-2 has cooperated with federal law enforcement under the terms of a non-prosecution agreement. CW-2 used a cellular telephone (the “CW-2 Facility”).

2. According to CW-1, in 2015, while CW-1 was an inmate at FCI Fort Dix, WRIGHT agreed to smuggle and did smuggle tobacco, K2,¹ suboxone,² and other contraband items to CW-1, in exchange for cash payments. As described in more detail below, WRIGHT received the cash from multiple sources, and WRIGHT delivered the contraband to Inmate 1 and Inmate 2, inside FCI Fort Dix, each of whom passed it along to CW-1.

February – September 2015

3. According to CW-1, between approximately February and September 2015, WRIGHT smuggled contraband to Inmate 1, inside FCI Fort Dix, who then passed it along to CW-1. In exchange for smuggling the contraband to Inmate 1, WRIGHT received thousands of dollars in payments from Individual 1.³

4. According to Inmate 1, WRIGHT delivered contraband, including tobacco and K2, directly to Inmate 1 inside FCI Fort Dix.

¹ K2, also known as “Spice,” has psychological effects similar to those resulting from marijuana, including paranoia, panic attacks, and giddiness. K2 can cause increased heart rate and elevate blood pressure, and appears to be stored in the body for long periods of time.

² Suboxone is a Schedule III narcotic. It is a prescription medication used to treat opioid addiction.

³ Individual 1 told law enforcement that Individual 1 “knew nothing” about the scheme set forth in this Complaint.

5. Bank records, Western Union records, cell phone records, and casino records corroborate that WRIGHT received payments from Individual 1. For example:

a. On February 19, 2015, there was a \$2,500 cash withdrawal from Individual 1's bank account. On February 19, 2015, there were three phone calls between the Wright Facility and the Individual 1 Facility. On February 20, 2015, in Cherry Hill, New Jersey, there was a \$2,500 deposit into WRIGHT's bank account.

b. On April 20, 2015, there were three phone calls between the Wright Facility and the Individual 1 Facility, including one call that lasted 7 and a half minutes. On April 21, 2015, there was a \$4,000 cash withdrawal from Individual 1's bank account. On that same day, there were 17 text messages and 4 phone calls between the Wright Facility and the Individual 1 Facility. Also on April 21, 2015, according to E-Z pass records, WRIGHT took the Ben Franklin Bridge between Camden, New Jersey and Philadelphia, Pennsylvania, leaving him in the vicinity of Individual 1's home. On that same day, there were \$2,000 in cash deposits into WRIGHT's bank accounts, and between April 21 and 22, 2015, WRIGHT's cash buy-in (meaning, cash that WRIGHT used to buy casino chips) at the Borgata Casino in Atlantic City was \$1,200, according to Borgata records.

c. On June 24, 2015, there was a \$2,081 cash withdrawal from Individual 1's bank account. On June 24, 2015, there were approximately 4 text messages and 2 phone calls between the Wright Facility and the Individual 1 Facility. Between June 24 and 25, 2015, WRIGHT's cash buy-in at the Borgata in Atlantic City was \$2,250, according to Borgata records.

October – December 2015

6. According to CW-1, between October and December 2015, WRIGHT smuggled contraband to Inmate 2, inside FCI Fort Dix, who then passed it along to CW-1. In exchange for smuggling the contraband to Inmate 2, WRIGHT received payments from CW-2.

7. According to Inmate 2, WRIGHT delivered packages of contraband containing K2 and suboxone directly to Inmate 2 inside FCI Fort Dix, and Inmate 2 passed those packages of contraband along to CW-1. And, according to Inmate 2, WRIGHT received cash payments from CW-2 during meetings in the Bronx, New York, in exchange for delivering the packages of contraband.

8. According to CW-2, Inmate 2 asked CW-2 to deliver contraband and cash to a correctional officer. According to CW-2, an individual driving a silver or gray Volvo or Volkswagen met CW-2 in the Bronx, New York, at night,

on multiple occasions in the Fall and Winter of 2015. On each occasion, CW-2 gave this individual cash, between \$5,000 and \$7,000, and contraband, such as K2, to be delivered to Inmate 2. According to E-Z pass records and photos, WRIGHT drove a silver Volkswagen sedan, a vehicle similar to the one identified by CW-2.

9. Additionally, cell phone records confirm that WRIGHT was in the vicinity of CW-2's home, in the Bronx, on three separate occasions during this time period:

a. On October 11, 2015, there were five calls between the Wright Facility and the CW-2 Facility. According to cell-site records, WRIGHT was in the Bronx in the vicinity of CW-2's residence during certain of those calls.

b. On November 8, 2015, there were five calls between the Wright Facility and the CW-2 Facility. According to cell-site records, WRIGHT was in the Bronx in the vicinity of CW-2's residence during certain of those calls.

c. On December 13, 2015, there were six calls between the Wright Facility and the CW-2 Facility. According to cell-site records, WRIGHT was in the Bronx in the vicinity of CW-2's residence during certain of those calls.

10. On April 12, 2018, law enforcement agents interviewed WRIGHT. WRIGHT admitted to having received cash payments from Individual 1, in Philadelphia, and from CW-2, in the Bronx, all in 2015. WRIGHT admitted to having deposited the cash payments into his bank accounts and to having used the cash payments to fund his gambling activities in Atlantic City. In exchange for the cash payments, WRIGHT admitted to having smuggled contraband, including tobacco, to inmates at FCI Fort Dix. WRIGHT denied having delivered K2 and suboxone to FCI Fort Dix inmates.