

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
 :
 v. : Crim. No.
 :
 NICOLO DENICHILO : 18 U.S.C. § 371
 :
 :

INFORMATION

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

(Conspiracy to Defraud the United States Bureau of Prisons)

BACKGROUND

1. At all times relevant to Count One of this Information:
 - a. Defendant NICOLO DENICHILO (“DENICHILO”) was a resident of Jersey City, New Jersey.
 - b. Adrian Goolcharran, a/k/a “Adrian Ahoda,” a/k/a “Adrian Ajoda,” a resident of Union City, New Jersey, was an associate of DENICHILO.
 - c. Fort Dix Federal Correctional Institution (“Fort Dix FCI”) was a low-security federal prison within the United States Bureau of Prisons (the “BOP”) located in Burlington County, New Jersey.
 - 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 GOOLCHARRAN.
 - e. Jason Arteaga-Loayza, a/k/a “Juice” (“Arteaga-Loayza”) was an inmate at Fort Dix FCI from on or about June 21, 2017 to on or about

September 20, 2018. Following his release from Fort Dix FCI, 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. Arteaga-Loayza was also an associate of GOOLCHARRAN.

THE CONSPIRACY

2. From at least in or about November 2018 to on or about March 12, 2020, in the District of New Jersey, and elsewhere, defendant

NICOLO DENICHILO

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 FCI.

OBJECT OF THE CONSPIRACY

3. It was the object of the conspiracy for DENICHILO, Goolcharran, Arteaga-Loayza, Moronta, and others to evade through trickery and device the BOP's security procedures in order to smuggle contraband into Fort Dix FCI, where it was sold to inmates for a profit.

MANNER AND MEANS

4. It was part of the conspiracy that:

a. Defendant DENICHILO, Goolcharran, Arteaga-Loayza, Moronta, and others used unmanned aerial vehicles, or drones, to smuggle contraband into Fort Dix FCI. On multiple occasions from at least in or about November 2018 to in or about March 2020, DENICHILO assisted Goolcharran

with flying drones over Fort Dix FCI and dropping packages of contraband into Fort Dix FCI. The contraband included tobacco, cell phones, cell phone chargers and accessories, and other materials. Several of the drone drops, including contraband dropped on or about November 15, 2018, and on or about March 12, 2020, were intercepted or recovered by BOP officials, but not all of the packages were successfully intercepted or recovered.

b. DENICHILO, Goolcharran, and their co-conspirators attempted to evade BOP officials by trickery and deception. For example, DENICHILO, Goolcharran, and their 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. With DENICHILO's assistance, Goolcharran flew the contraband in from concealed positions in the woods near Fort Dix FCI. In some cases, Goolcharran dropped the contraband on the rooftop of a Fort Dix FCI housing unit that Moronta accessed by subverting the lock on the hatch leading to the rooftop.

c. DENICHILO, Goolcharran, and their co-conspirators coordinated the drone drops into Fort Dix FCI, including by telephone calls and text messages using, in part, contraband cell phones within Fort Dix FCI that were concealed from detection.

OVERT ACTS

5. 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. In the early morning hours on or about November 15, 2018, in Burlington County, New Jersey, DENICHILO and Goolcharran used a drone to deliver a package containing contraband, including approximately 168 pre-packed bags of tobacco and two cell phones, into Fort Dix FCI.

b. During the evening hours on or about March 12, 2020, in Burlington County, New Jersey, DENICHILO and Goolcharran flew a drone from a concealed position in the woods near Fort Dix FCI and used the drone to drop another package of contraband into Fort Dix FCI. The contraband included approximately 34 cell phones, 9 chargers, 51 SIM cards, multiple earbuds, and 3 SD cards.

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


PHILIP R. SELLINGER
United States Attorney