

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.  
 :  
 v. : Criminal No. 16-  
 :  
 KAREN ADRIANZEN : 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:

Introduction

1. At all times relevant to this Information:
  - a. Defendant KAREN ADRIANZEN resided in North Bergen, New Jersey.
  - b. Jason Perez, a co-conspirator not named as a defendant herein, was a federal pretrial detainee at the Essex County Correctional Facility (the "Essex County Jail") in Newark, New Jersey.
  - c. The Essex County Jail was a facility in Newark, New Jersey that held federal pretrial detainees by direction of, and pursuant to, a contract or agreement with the United States Attorney General. Essex County Jail corrections officers who guarded these detainees acted for and on behalf of the United States and the United States Department of Justice in these official functions.

### The Conspiracy

2. From in or about September 2013 to in or about May 2014, in Essex County, in the District of New Jersey, defendant

KAREN ADRIANZEN

did knowingly and intentionally conspire and agree with others to commit an offense against the United States, namely bribery, by directly and indirectly corruptly giving, offering, and promising things of value, that is, money, to public officials, namely Essex County Jail corrections officers who guarded federal pretrial detainees, with intent to influence official acts and to induce such public officials to do and omit to do acts in violation of their official duties, contrary to Title 18, United States Code, Sections 201(b)(1)(A) and (C).

### Object of the Conspiracy

3. The object of the conspiracy was for defendant KAREN ADRIANZEN and others to give, offer, and promise payments to Essex County Jail corrections officers, and individuals acting at the direction of corrections officers, in exchange for the corrections officers and others smuggling contraband, including cellular telephones and marijuana, to inmate Jason Perez at the Essex County Jail.

### Manner and Means of the Conspiracy

4. It was part of the conspiracy that:

a. Defendant KAREN ADRIANZEN retrieved contraband, including marijuana and cellular telephones manufactured outside of New Jersey, to be smuggled into the Essex County Jail by corrections officers, in exchange for payment.

b. Defendant KAREN ADRIANZEN delivered the contraband, along with cash payments, to the corrections officers, or to individuals acting at the direction of the corrections officers.

c. The corrections officers, or individuals acting at the direction of the corrections officers, received the contraband and the cash payments from defendant KAREN ADRIANZEN.

d. The corrections officers delivered the contraband to Jason Perez inside the Essex County Jail.

e. Jason Perez sold the contraband to other inmates in the Essex County Jail and accepted payments from those inmates via Western Union money transfers.

f. Defendant KAREN ADRIANZEN and others collected the Western Union money transfers sent on behalf of inmates at the Essex County Jail who ordered contraband from Jason Perez.

#### Overt Acts

5. In furtherance of the conspiracy and in order to effect the object thereof, defendant KAREN ADRIANZEN and her co-conspirators committed and caused to be committed the following overt acts, among others, in the District of New Jersey and elsewhere:

a. In or about November 2013, in North Bergen, New Jersey, defendant KAREN ADRIANZEN delivered contraband, including marijuana, and a cash bribe, to an individual acting at the direction of an Essex County Jail corrections officer.

b. In or about December 2013, in Secaucus, New Jersey, defendant KAREN ADRIANZEN delivered contraband, including a cellular telephone, and a cash bribe, to an Essex County Jail corrections officer.

c. The corrections officer subsequently delivered the contraband to Jason Perez inside the Essex County Jail.

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

Paul J. Fishman/rah  
PAUL J. FISHMAN  
United States Attorney

CASE NUMBER: 16-

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United States District Court  
District of New Jersey

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UNITED STATES OF AMERICA

v.

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INFORMATION FOR

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**PAUL J. FISHMAN**

*U.S. ATTORNEY*

*NEWARK, NEW JERSEY*

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**RAHUL AGARWAL**

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