

RECEIVED

SEP 18 2018  
RA/TS/2016R00291

AT 8:30 \_\_\_\_\_ M  
WILLIAM T. WALSH, CLERK

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon. Jerome B. Simandle
	:	
v.	:	Criminal No. 18- <u>564</u>
	:	
PAUL ANTON WRIGHT	:	18 U.S.C. § 201(b)(2)
	:	18 U.S.C. § 1952(a)(3)
	:	18 U.S.C. § 1791(a)(1)
	:	18 U.S.C. § 981(a)(1)(C)
	:	28 U.S.C. § 2461(c)

**INDICTMENT**

The Grand Jury in and for the District of New Jersey, sitting at Newark,  
charges:

**COUNTS 1 and 2**  
**(Agreeing to Accept and Accepting Bribes)**

1. At all times relevant to Counts 1 and 2 of this Indictment:
  - a. Defendant PAUL ANTON WRIGHT ("WRIGHT") was a Correctional Officer at the Federal Correctional Institution Fort Dix ("FCI Fort Dix").
  - b. The Federal Bureau of Prisons ("BOP") was an agency within the United States Department of Justice that was responsible, among other things, for guarding federal inmates in prisons. FCI Fort Dix was a BOP facility for male inmates located in Burlington County, New Jersey.
  - c. Federal inmates housed at FCI Fort Dix were prohibited from possessing contraband in the facility. The FCI Fort Dix Admission and Orientation Inmate Handbook (the "handbook") 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 and tobacco were prohibited within FCI Fort Dix.

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. Inmates 1, 2, and 3 were inmates at FCI Fort Dix.

f. Individual 1 was a relative of Inmate 2.

g. Individual 2 was a relative of Inmate 3's girlfriend.

**Wright Agrees to Accept and Accepts Bribes From Individual 1**

2. From in or about February 2015 to in or about September 2015, at FCI Fort Dix, WRIGHT agreed to deliver contraband, including synthetic marijuana ("K2") and tobacco, to Inmate 2, in exchange for cash payments from Individual 1. Thereafter, WRIGHT accepted the cash payments from Individual 1, while in Philadelphia, Pennsylvania, and delivered contraband to Inmate 2 at FCI Fort Dix.

3. For instance, on or about April 21, 2015, WRIGHT traveled from New Jersey to Philadelphia, Pennsylvania, to accept a cash payment from Individual 1. WRIGHT deposited a portion of the cash payment into his bank account and used a portion of the cash payment to gamble at a casino in Atlantic City, New

Jersey. In exchange for this cash payment, WRIGHT thereafter delivered contraband to Inmate 2 at FCI Fort Dix, who passed the contraband to Inmate 1.

**Wright Agrees to Accept and Accepts Bribes From Individual 2**

4. From in or about October 2015 to in or about December 2015, at FCI Fort Dix, WRIGHT agreed to deliver contraband, including K2, suboxone, and tobacco, to Inmate 3, in exchange for cash payments from Individual 2. Thereafter, WRIGHT accepted the cash payments from Individual 2, while in the Bronx, New York, and delivered contraband to Inmate 3 at FCI Fort Dix.

5. For instance, on or about December 13, 2015, WRIGHT traveled from New Jersey to the Bronx to accept a cash payment of several thousand dollars from Individual 2. In exchange for this cash payment, WRIGHT thereafter delivered contraband to Inmate 3 at FCI Fort Dix, who passed the contraband to Inmate 1.

6. Between in or about the dates set forth below, 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, corruptly demanded, sought, received, accepted, and agreed 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 WRIGHT's official duties:

<b>Count</b>	<b>Dates of Payments</b>	<b>Type of Payment</b>	<b>Payor</b>
1	February 2015 to September 2015	Cash	Individual 1
2	October 2015 to December 2015	Cash	Individual 2

In violation of Title 18, United States Code, Section 201(b)(2) and Section

2.

**COUNTS 3 and 4**  
**(Interstate Travel to Promote and Facilitate Bribery)**

1. The allegations set forth in paragraphs 1 to 5 of Counts 1 and 2 of this Indictment are realleged and incorporated as if set forth herein.

2. On or about the dates set forth below, in the District of New Jersey, and elsewhere, defendant

PAUL ANTON WRIGHT

knowingly and intentionally traveled in interstate commerce with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, namely bribery, contrary to Title 18, United States Code, Section 201(b)(2), and thereafter performed and attempted to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment and carrying on of the unlawful activity.

<b>Count</b>	<b>Approximate Date</b>	<b>Interstate Travel</b>	<b>Acts Performed Thereafter</b>
3	April 21, 2015	New Jersey to Pennsylvania, as set forth in Paragraph 3 of Counts 1 and 2	Receipt of cash payment from Individual 1 and delivery of contraband to Inmate 2, as set forth in Paragraph 3 of Counts 1 and 2
4	December 13, 2015	New Jersey to New York, as set forth in Paragraph 5 of Counts 1 and 2	Receipt of cash payment from Individual 2 and delivery of contraband to Inmate 3, as set forth in Paragraph 5 of Counts 1 and 2

In violation of Title 18, United States Code, Section 1952(a)(3) and Section

2.

**COUNT 5**  
**(Providing Contraband to an  
Inmate Inside a Correctional Facility)**

1. The allegations set forth in paragraphs 1 to 5 of Counts 1 and 2 of this Indictment are realleged and incorporated as if set forth herein.

2. Between in or about February 2015 and in or about December 2015, in the District of New Jersey, and elsewhere, defendant

PAUL ANTON WRIGHT,

in violation of a statute and rule and order issued under a statute, knowingly provided and attempted to provide to inmates at FCI Fort Dix prohibited objects, namely synthetic marijuana and suboxone, as defined in Title 18, United States Code, Section 1791(d)(1)(B).

In violation of Title 18, United States Code, Sections 1791(a)(1) and (b)(3) and Section 2.

**FORFEITURE ALLEGATION**

1. The allegations contained in Counts 1 to 4 of this Indictment are hereby realleged and incorporated by reference for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. The United States hereby gives notice to defendant PAUL ANTON WRIGHT that upon conviction of the offenses charged in Counts 1 to 4 of this Indictment, the United States will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which requires any person convicted of such offenses to forfeit any property, real or personal, constituting or derived from proceeds traceable to such offenses.

3. If any of the above-described forfeitable property, as a result of any act or omission of WRIGHT:

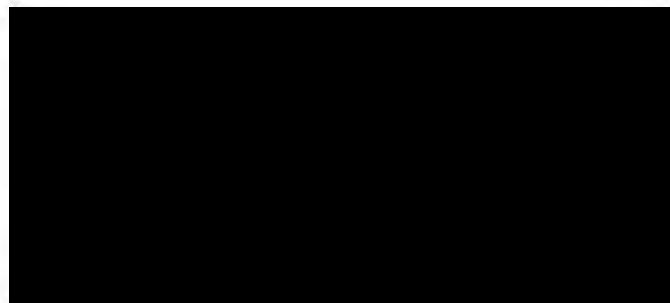
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c),

to seek forfeiture of any other property of WRIGHT up to the value of the forfeitable property described in paragraph 2 of the Forfeiture Allegation.

A TRUE BILL

*Craig Carpenito*  
\_\_\_\_\_  
CRAIG CARPENITO  
UNITED STATES ATTORNEY





**CASE NUMBER: 18- 564 (TBS)**

**United States District Court  
District of New Jersey**

**UNITED STATES OF AMERICA**

**v.**

**PAUL ANTON WRIGHT**

**INDICTMENT FOR**

- 18 U.S.C. § 201(b)(2)
- 18 U.S.C. § 1952(a)(3)
- 18 U.S.C. § 1791(a)(1)
- 18 U.S.C. § 981(a)(1)(C)
- 28 U.S.C. § 2461(c)

**A True Bill**

**U.S. ATTORNEY  
NEWARK, NEW JERSEY**

**RAHUL AGARWAL  
TAZNEEN SHAHABUDDIN  
ASSISTANT U.S. ATTORNEYS  
(973) 297-4395  
(973) 645-2813**