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

UNITED STATES OF AMERICA : **TO BE FILED UNDER SEAL**
:
: Hon. Michael A. Hammer
v. :
: Mag. No. 19-4434
:
JASON ARTEAGA LOAYZA, : COMPLAINT
a/k/a "JUICE" :

I, William Matelski, 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 United States Department of Justice Office of Inspector General, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.



William Matelski, Special Agent
U.S. Dept. of Justice
Office of Inspector General

Sworn to before me and subscribed in my presence,
November 4, 2019 at Newark, New Jersey

HONORABLE MICHAEL A. HAMMER
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

COUNT 1
(Conspiracy)

From in or about October 2018 to in or about April 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:

- (a) defraud the United States Bureau of Prisons ("BOP") by impeding, impairing, and disturbing the BOP's lawful and legitimate function to maintain the order, discipline, and security of federal prisons, including Federal Correctional Institution Fort Dix; and
- (b) commit an offense against the United States, specifically providing and attempting to provide prohibited objects to an inmate of Fort Dix, including tobacco and cell phone chargers, and an inmate of a prison possessing and obtaining and attempting to possess and obtain such prohibited objects, contrary to Title 18, United States Code, Sections 1791(a) and (d)(1)(F)-(G);

and did acts as set forth in the complaint to effect the objects of the conspiracy.

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

COUNT 2
(Possession of Narcotics with Intent to Distribute)

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 intent to distribute a quantity 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).

ATTACHMENT B

I, William Matelski, a Special Agent with the U.S. Department of Justice Office of Inspector General, have been personally involved in the investigation of this matter. The information contained in the complaint is based upon my personal knowledge, as well as information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of relevant facts; (b) my review of publicly available information; and (c) my review of business records and other evidence. Because this complaint is being submitted for the limited purpose of establishing probable cause, it does not include every fact that I have learned during the investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

BACKGROUND

1. At all times relevant to this Complaint, Federal Correctional Institution Fort Dix ("Fort Dix") was a low-security federal prison located in Burlington County, New Jersey.

2. Defendant JASON ARTEAGA LOAYZA, a/k/a "JUICE" ("defendant ARTEAGA") was an inmate at Fort Dix from on or about June 21, 2017 to on or about September 20, 2018. While he was a Fort Dix inmate, he was found in possession of a contraband cellphone on or about December 31, 2017. Following his release from Fort Dix, defendant ARTEAGA resided at Toler House, a halfway house in Newark, until in or about December 2018, and then moved to a residence on Garfield Avenue in Jersey City, New Jersey (the "ARTEAGA RESIDENCE").

3. Defendant ARTEAGA used several telephone numbers, including a number ending in -5962 ("ARTEAGA Phone 1") and a number ending in -7517 ("ARTEAGA Phone 2").

4. Co-Conspirator 1 ("CC-1") was an inmate at Fort Dix from on or about April 10, 2018 to on or about March 14, 2019.

5. As set forth below, there is probable cause to believe that defendant ARTEAGA conspired with others (including CC-1) to use unmanned aircrafts, or drones, to smuggle contraband into Fort Dix (the "Drone Conspiracy"). There also is probable cause to believe that defendant ARTEAGA possessed with the intent to distribute a mixture containing heroin and fentanyl.

EVIDENCE OF THE DRONE CONSPIRACY

6. On or about October 30, 2018, at approximately 1:40 a.m., a Fort Dix officer observed a drone with a fishing line attached hovering above an inmate housing unit on the west side of Fort Dix. Officers responded to the top floor of the housing unit and discovered a black trash bag directly underneath the hatch that led to the rooftop. The bolts securing the roof hatch appeared to have been removed. A Fort Dix officer observed a skid mark on the damp rooftop, consistent with drag marks from a bag. Inside the black bag were approximately 127 small bags of Bugler tobacco, approximately 10 cell phone chargers, and approximately 10 USB charging cables.

7. An officer responding to the report of the drone observed CC-1 exiting the nearby bathroom on the top floor of the housing unit. CC-1's pants were wet in the area of CC-1's knees, and CC-1's legs were cold to the touch. Two bolts, consistent with the bolts used to keep the roof access hatch secure, were found in the trash can of the bathroom. Officers also recovered a black Samsung cellphone from the area underneath the roof hatch, likely used by CC-1 to coordinate the drone drop ("CC-1 Phone").

8. Phone records show that CC-1 Phone communicated with ARTEAGA Phone 1 approximately 330 times between on or about October 24, 2018 and October 29, 2018. Their last communications were on or about October 29, 2018, hours before the drone drop.

Communications Between ARTEAGA Phone 1 and CC-1 Phone on or about October 29, 2018

From	To	Approximate Time	Text or Call
CC-1 Phone	ARTEAGA Phone 1	2:42 PM	Text Message
ARTEAGA Phone 1	CC-1 Phone	5:54 PM	Text Message
ARTEAGA Phone 1	CC-1 Phone	7:15 PM	Text Message
CC-1 Phone	ARTEAGA Phone 1	7:27 PM	Text Message
ARTEAGA Phone 1	CC-1 Phone	7:28 PM	Text Message
CC-1 Phone	ARTEAGA Phone 1	7:45 PM	Text Message
CC-1 Phone	ARTEAGA Phone 1	7:46 PM	Text Message
CC-1 Phone	ARTEAGA Phone 1	7:47 PM	Text Message
CC-1 Phone	ARTEAGA Phone 1	7:48 PM	Text Message
ARTEAGA Phone 1	CC-1 Phone	7:49 PM	Text Message
ARTEAGA Phone 1	CC-1 Phone	7:49 PM	Text Message
ARTEAGA Phone 1	CC-1 Phone	7:49 PM	Text Message
ARTEAGA Phone 1	CC-1 Phone	7:52 PM	Text Message
ARTEAGA Phone 1	CC-1 Phone	8:08 PM	Text Message
CC-1 Phone	ARTEAGA Phone 1	8:09 PM	Call

From	To	Approximate Time	Text or Call
CC-1 Phone	ARTEAGA Phone 1	8:09 PM	Call
ARTEAGA Phone 1	CC-1 Phone	8:13 PM	Call
ARTEAGA Phone 1	CC-1 Phone	8:17 PM	Call
ARTEAGA Phone 1	CC-1 Phone	8:23 PM	Call

The last communication between CC-1 Phone and ARTEAGA Phone 1 was approximately five hours before the drone drop.

9. Following the October 30, 2018 drone drop, there were multiple drone sightings at Fort Dix. There were also several instances where packages of contraband were recovered inside of Fort Dix with string or fishing line attached, similar to the fishing line used to secure the package to the drone on or about October 30, 2018. In each instance where contraband was recovered, the packages contained cellphones or cellphone equipment, such as cellphone chargers and batteries. One of the suspected drone drops following the October 30, 2018 drone drop also contained Bugler tobacco. On or about November 11, 2018, at approximately 1:30 a.m., Fort Dix officers recovered a large black garbage bag on the grass between the inner and outer perimeter fences. The bag had fishing line attached to it, and contained approximately 150 packages of Bugler tobacco, a bundle of fishing line, and approximately 6 black LG phones.

10. On or about June 27, 2019, law enforcement agents searched the ARTEAGA RESIDENCE pursuant to search warrants and found evidence that defendant ARTEAGA participated in drone drops of contraband into Fort Dix. Specifically, agents recovered:

- a. Cellphone equipment in a kitchen closet including: (1) a box from Amazon Fulfilment Services addressed to defendant ARTEAGA, with a shipping date of October 29, 2018, containing approximately 14 boxes of reconditioned cellphones and chargers with the cellphones missing; (2) a bag containing approximately 20 cellphone charging cords in their original packaging; (3) a bag containing approximately 11 LG cellphones and approximately 7 empty packages of T-Mobile SIM cards; and (4) an L8 STAR mini phone, which is approximately 3 inches by 1 inch. Mini phones similar to the one recovered have been confiscated inside of Fort Dix.
- b. A Bugler tobacco box, containing approximately twelve bags of Bugler tobacco, stored in the same kitchen closet as the cellphone items. The Bugler tobacco was consistent with the

tobacco recovered from the October 30, 2018 and November 11, 2018 drone drops.

- c. Approximately 20 packets labeled Suboxone Sublingual Film, a prescription opiate that is used to treat dependence on opioid drugs. The Suboxone was found in the master bedroom, inside of a suitcase which also contained defendant ARTEAGA's driver's license and a clear plastic bag containing a white chunky substance. Contraband Suboxone has been found inside of Fort Dix.
- d. ARTEAGA Phone 1, located in the dresser of the master bedroom, and ARTEAGA Phone 2, which was in defendant ARTEAGA's pocket. Both phones were seized and searched pursuant to search warrants.

11. A search of defendant ARTEAGA's iCloud account, executed pursuant to a search warrant, revealed the following images in his photo library:

- a. Approximately four screenshots of google search results for "fort dix weather" showing the temperature, precipitation, and wind on "Mon, 12 AM," "Mon, 1 AM," "Mon, 2 AM," and "Mon, 3 AM," saved on or about Sunday, October 21, 2018.
- b. Approximately three screenshots of live video chats between defendant ARTEAGA and CC-1, saved on or about October 27, 2018, a few days before the October 30, 2018 drone drop. In the screenshots, CC-1 appears to be inside of Fort Dix and is wearing a Fort Dix prison uniform.

12. A few days before the October 30, 2018 drone drop, on or about October 27, 2018, Jersey City police officers responded to a report of an unknown male inside of the common area of the ARTEAGA RESIDENCE. When officers responded, they discovered a man with multiple plastic bags containing numerous AT&T cell phones. The individual stated that he came to the address to meet Juice. Although defendant ARTEAGA was still residing at Toler House, records show that he obtained a pass to leave on October 27, 2018.

13. A search of ARTEAGA Phone 2 revealed communications with a contact saved as "Adogfy" in which defendant ARTEAGA and Adogfy appear to coordinate drone drops on Fort Dix. For example, on or about April 15, 2019, ARTEAGA Phone 2 and Adogfy had the following exchange:

April 15, 2019 Communications Between ARTEAGA Phone 2 and Adogfy¹

From	To	Approximate Time	Message
Adogfy	ARTEAGA Phone 2	3:17 AM	Yooo
ARTEAGA Phone 2	Adogfy	5:47 AM	Was gud
Adogfy	ARTEAGA Phone 2	1:04 PM	Yoo
ARTEAGA Phone 2	Adogfy	1:21 PM	Was gud bro
Adogfy	ARTEAGA Phone 2	1:23 PM	Same shyt
Adogfy	ARTEAGA Phone 2	1:24 PM	Hit me when you can

ARTEAGA Phone 2 then called Adogfy at or about 1:24 p.m. The next morning, at or about 6:50 a.m., a package of contraband was found in Fort Dix with a cord attached to it. The package contained approximately 84 packets of Hydroxycut drink mix, approximately 9 vacuum sealed bags of tobacco, approximately 3 Samsung cellphone batteries, approximately 2 pairs of reading glasses, and approximately 1 L8 Star cellphone.

14. On or about April 22, 2019, ARTEAGA Phone 2 sent a message to Adogfy: "U got the pics send them to me." In response, Adogfy sent ARTEAGA Phone 2 a photo that appeared to be an aerial shot of Fort Dix. Approximately 2 minutes later, ARTEAGA Phone 2 responded with the same photo, marked with two yellow lines, and a message, "Behind the buildind [sic] where the yellow is the long yellow line is a fence." Approximately one minute later, Adogfy sent ARTEAGA Phone 2 another aerial photo that appeared to be Fort Dix, which contained orange target marks over several housing units. Approximately eight minutes later, ARTEAGA Phone 2 responded with the same photo, marked with a black dot behind a particular housing unit, and a message stating, "Black dot." Based on this exchange, it is likely that defendant ARTEAGA and Adogfy were discussing where to fly the drone and drop contraband packages.

15. On or about April 26, 2019, ARTEAGA Phone 2 sent a message to Adogfy asking, "U think that u cud do something 2m." Adogfy responded, "2m too windy 20mph." Based on these communications, there is probable cause to believe that defendant ARTEAGA was trying to arrange a drone drop with Adogfy for the next day.

¹ All messages herein are reproduced as they appear in the phone.

16. There also is evidence that defendant ARTEAGA received payments from people connected with Fort Dix inmates. Records from a mobile payment service that allows users to transfer funds electronically show two such cash transfers to defendant ARTEAGA. On or about October 26, 2018, defendant ARTEAGA received a \$900 payment from an individual who has sent money to and had telephone calls with an inmate who has been at Fort Dix since in or about September 2017. On or about November 24, 2018, defendant ARTEAGA received a \$1,700 payment from an individual who was listed in BOP records as the nephew of an inmate who was at Fort Dix from in or about July 2017 to in or about March 2019.

EVIDENCE OF POSSESSION WITH INTENT TO DISTRIBUTE NARCOTICS

17. On or about June 27, 2019, law enforcement agents searching the ARTEAGA RESIDENCE recovered a clear plastic bag containing a white chunky substance. The plastic bag was in a piece of luggage that also contained defendant ARTEAGA's driver's license and was located in the master bedroom. Agents also recovered a black scale with white powder residue from a closet of the master bedroom, and approximately forty-three empty small clear plastic bags from a dresser drawer in the master bedroom.

18. Laboratory testing revealed that the plastic bag in the luggage contained approximately 21.203 grams of a substance containing heroin and fentanyl.

19. There is probable cause to believe that the master bedroom was defendant ARTEAGA's bedroom. When agents first entered the ARTEAGA RESIDENCE, defendant ARTEAGA stated that "the baby" was sleeping in defendant ARTEAGA's bedroom. Agents then observed a young child asleep in the master bedroom. In addition to containing the suitcase with his driver's license, the master bedroom also contained a gold medallion identified as belonging to defendant ARTEAGA by a woman at the ARTEAGA RESIDENCE. There were two closets in the bedroom, one of which contained mostly women's clothes and shoes, and one of which contained mostly men's clothes and shoes. ARTEAGA Phone 1, which was found in the dresser in the master bedroom, was named in the phone settings "Jason's iPhone."