

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No.
	:	
ADRIAN GOOLCHARRAN, a/k/a	:	18 U.S.C. § 371
“ADRIAN AHODA,” a/k/a “ADRIAN	:	
AJODA”	:	

INFORMATION

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

BACKGROUND

1. At all times relevant to this Information:
 - a. Defendant ADRIAN GOOLCHARRAN, a/k/a “ADRIAN AHODA,” a/k/a “ADRIAN AJODA” (“GOOLCHARRAN”) was a resident of Union City, New Jersey.
 - b. Nicolo Denichilo, a resident of Jersey City, New Jersey, was an associate of GOOLCHARRAN.
 - 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 an associate of GOOLCHARRAN.

THE CONSPIRACY

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

ADRIAN GOOLCHARRAN,
a/k/a “ADRIAN AHODA,”
a/k/a “ADRIAN AJODA,”

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 GOOLCHARRAN 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 GOOLCHARRAN, Denichilo, 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 July 2018 to in or about March 2020, GOOLCHARRAN, with Denichilo's assistance, flew drones over Fort Dix FCI and dropped packages of contraband into Fort Dix FCI. The contraband included marijuana, testosterone cypionate (an anabolic steroid), saw blades, a hand tool with tool bits, tobacco, cell phones, cell phone chargers and accessories, and other materials. Several of the drone drops, including contraband dropped on or about July 26, 2018, October 30, 2018, November 11, 2018, November 15, 2018, April 16, 2019, June 23, 2019, September 26, 2019, October 1, 2019, March 12, 2020, and in or about November 2019, were intercepted or recovered by BOP officials, but not all of the packages were successfully intercepted or recovered.

b. GOOLCHARRAN and his co-conspirators attempted to evade BOP officials by trickery and deception. For example, GOOLCHARRAN and his 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. GOOLCHARRAN, with Denichilo's assistance, 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. When there was too much contraband for the drone to carry in one trip, GOOLCHARRAN flew multiple trips using the drone.

c. GOOLCHARRAN planned and coordinated the drone drops into Fort Dix FCI with Arteaga-Loayza, Moronta, and others, 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 July 26, 2018, in Burlington County, New Jersey, GOOLCHARRAN used a drone to deliver multiple packages of contraband into Fort Dix FCI. The contraband included approximately 27 cell phones, 10 cell phone batteries, 30 cell phone chargers, 105 packages of tobacco, 35 syringes, 2 vials of testosterone cypionate (a Schedule III controlled substance), 15 twenty-count sleeves of what appeared to be clenbuterol pills, 2 vials labeled 250 mg. testosterone enanthate, 4 vials labeled 100 mg. trenbolone acetate, 14 vials of sterile water, 2 packages of matches, and a box of Just For Men hair color.

b. In the early morning hours on or about October 24, 2018, in Burlington County, New Jersey, GOOLCHARRAN flew a drone containing contraband into Fort Dix FCI (the “October 24, 2018 drone drop”).

c. In the days leading up to the October 24, 2018 drone drop, GOOLCHARRAN, Arteaga-Loayza, and Moronta, who was then an inmate at Fort Dix, sent multiple text messages to coordinate the drone drop.

d. In the early morning hours on or about October 30, 2018, in Burlington County, New Jersey, Goolcharran used a drone to drop a package containing approximately 127 bags of Bugler tobacco, 10 cell phone chargers, and 10 USB charging cables, into Fort Dix FCI (the “October 30, 2018 drone drop”).

e. On or about October 30, 2018, Moronta went to the rooftop area of the housing unit in Fort Dix FCI where GOOLCHARRAN was dropping the package to receive the contraband.

f. On or about October 30, 2018, GOOLCHARRAN, Arteaga-Loayza, and Moronta exchanged text messages to coordinate the October 30, 2018 drone drop.

g. On or about April 22, 2019, GOOLCHARRAN and Arteaga-Loayza exchanged text messages about where in Fort Dix FCI to drop the contraband.

h. On or about April 26, 2019, GOOLCHARRAN and Arteaga-Loayza exchanged text messages about a potential drone drop.

i. In the early morning hours on or about September 26, 2019, in Burlington County, New Jersey, GOOLCHARRAN used a drone to drop a package of contraband into Fort Dix FCI. The contraband included approximately 34 cell phones, 2 cell phone chargers, 40 Subscriber Identity Module (“SIM”) cards, 2 white metal saw blades, 1 contact lens case, 1 bottle of contact lens solution, and 2 pairs of contact lenses.

j. During the evening hours on or about October 1, 2019, in Burlington County, New Jersey, GOOLCHARRAN used a drone to drop a package of contraband into Fort Dix FCI. The contraband included approximately 32 cell phones, 32 SIM cards, 2 cell phone chargers, 1 Husky hand tool with 2 tool bits, 2 pairs of contact lenses, 1 contact lens case, and 1 bottle of contact lens solution.

k. In or about November 2019, in Burlington County, New Jersey, GOOLCHARRAN used a drone to drop a package of contraband into Fort Dix FCI. The contraband included approximately 26 cell phones, 21 phone chargers, 30 SIM cards, 3 vacuum sealed bags of loose tobacco, and 1 bag containing approximately 2.6 ounces of marijuana.

l. During the evening hours on or about March 12, 2020, in Burlington County, New Jersey, GOOLCHARRAN, with assistance from Denichilo, used a drone to drop a package of contraband into Fort Dix FCI. The contraband included approximately 34 cell phones, 9 chargers, 51 SIM cards, multiple earbuds, and 3 Secure Digital cards.

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



PHILIP R. SELLINGER
United States Attorney