

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

TERRI LYNN OUTER,

Defendant.

COMPLAINT

Violations of 18 U.S.C. §§ 201(b)(2)(C);
371; 1791(a)(1)

COUNTY OF OFFENSES:
ORANGE

SOUTHERN DISTRICT OF NEW YORK, ss.:

RYAN LALLY, being duly sworn, deposes and says that he is a Special Agent with the Office of the Inspector General, United States Department of Justice ("DOJ-OIG"), and charges as follows:

COUNT ONE
(Bribery)

1. From at least in or about January 2024 through at least in or about August 2025, in the Southern District of New York and elsewhere, TERRI LYNN OUTER, the defendant, while OUTER was a public official, unlawfully and knowingly, directly and indirectly, corruptly demanded, sought, received, accepted, and agreed to receive and accept things of value personally and for other persons, in return for being induced to do and omit to do acts in violation of OUTER's official duty, to wit, OUTER solicited and received payments, in return for smuggling contraband intended for prisoners into Federal Correctional Institution Otisville, where she worked, in violation of her official duty not to smuggle contraband intended for prisoners into Federal Correctional Institution Otisville.

(Title 18, United States Code, Section 201(b)(2)(C).)

COUNT TWO
(Providing or Possessing Contraband in Prison)

2. From at least in or about January 2024 through at least in or about August 2025, in the Southern District of New York and elsewhere, TERRI LYNN OUTER, the defendant, in violation of a statute, rule, and order issued under a statute, knowingly provided and attempted to provide to an inmate of a prison, namely Federal Correctional Institution Otisville, prohibited objects.

3. The prohibited objects involved in the offense were marijuana, in violation of Title 18, United States Code, Sections 1791(b)(3) and 1791(d)(1)(B), and an object that threatens the order, discipline, and security of a prison, and the life, health, and safety of an individual, to wit, several pounds of loose leaf tobacco, in violation of Title 18, United States Code, Sections 1791(b)(5) and 1791(d)(1)(G).

(Title 18, United States Code, Section 1791.)

COUNT THREE

(Conspiracy to Provide or Possess Contraband in Prison)

4. From at least in or about January 2024 through at least in or about August 2025, in the Southern District of New York and elsewhere, TERRI LYNN OUTER, the defendant, together with others known and unknown, willfully and knowingly combined, conspired, and agreed together and with each other to commit an offense against the United States, to wit, providing or possessing contraband in prison, in violation of Title 18, United States Code, Section 1791(a)(1).

5. It was a part and object of the conspiracy that TERRI LYNN OUTER, the defendant, and others known and unknown, in violation of a statute, rule, and order issued under a statute, would knowingly provide and attempt to provide to inmates of a prison, namely Federal Correctional Institution Otisville, prohibited objects.

Overt Acts

6. In furtherance of the conspiracy and to effect the illegal objects thereof, TERRI LYNN OUTER, the defendant, together with others known and unknown, committed the following overt acts in the Southern District of New York, among others:

a. In or about January 2024, OUTER opened a bank account at a particular financial institution to receive funds from co-conspirators paid to her in exchange for smuggling contraband into a federal prison.

b. In or about April 2024 and July 2024, OUTER conducted online research regarding whether contraband would show up on prison scanners.

c. In or about July 2025, OUTER and a co-conspirator communicated via electronic message regarding the smuggling of contraband into a federal prison.

d. In or about July 2025, a co-conspirator sent contraband to OUTER so that OUTER would smuggle it into federal prison.

(Title 18, United States Code, Section 371.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

7. I am a Special Agent with DOJ-OIG and a former corrections officer for the Federal Bureau of Prisons ("BOP"). In those capacities, I have participated in numerous investigations related to narcotics and the smuggling of contraband into federal prisons. In addition, I have spoken with other DOJ-OIG agents and law enforcement agents and officers who personally participated in the investigation of this matter. I make this Affidavit in part on personal knowledge based on my participation in the investigation; review of reports and other documents prepared by law enforcement agents and others; review of other reports and documents; and training and experience.

8. Throughout this Affidavit, where I assert that a statement was made, I was not the individual to whom the statement was made unless I specifically so state. Rather, information about the statement was provided by someone else to whom I have spoken or whose reports I have read and reviewed. Such statements are among many statements made by others and they are set forth in substance and in part, unless otherwise indicated. Similarly, unless otherwise indicated, information in this Affidavit resulting from surveillance does not necessarily set forth my personal observations, but may have been provided to me by other law enforcement agents who observed the events, and to whom I have spoken or whose reports I have read. Furthermore, the facts and circumstances of this investigation have been summarized for the specific purposes of this Affidavit. I have not attempted to set forth the complete factual history of this investigation or all of its details. In making this Affidavit, I rely only on the facts stated herein.

9. Based on my involvement in this investigation, review of digital messages, personal observations, conversations with other members of law enforcement, review of law enforcement reports and records, review of other reports and records, and training and experience, I understand the following, in substance and in part:

OUTER'S ROLE IN FCI OTISVILLE

a. From at least January 2024 through at least August 2025, TERRI LYNN OUTER, the defendant, was employed by Interactive Medical Specialist, Inc.—a contractor that has provided medical services to Federal Correctional Institution Otisville (“FCI Otisville”)—as a dental assistant. In her role, OUTER worked in FCI Otisville, a prison in Orange County, New York.

b. On or about September 13, 2024, in connection with her work in FCI Otisville, OUTER signed a form explaining, in substance and in part, that smuggling contraband into a federal prison can constitute a crime. Specifically, the form states, in part: “Section 1791: Whoever, in violation of a statute or a rule or order issued under a statute provides an inmate of a prison a prohibited object or attempts to do so, shall be subject to a penalty of imprisonment for not more than twenty years, a fine of not more than \$250,000 or both.” The form also states, in part “Contraband: The following items are considered contraband. They include, but are not limited to: ... Narcotics ... Drugs.”

c. On or about September 13, 2024, OUTER signed an “Authorization for Release of Information Criminal History Check” form in connection with her work in FCI Otisville. On this form, OUTER provided a specific home telephone number ending in 9585 (the “Outer Phone Number”), a mailing address of a specific P.O. Box in Montague, New Jersey (the “Outer P.O. Box”) and a physical address of a specific address on Shore Drive in Montague, New Jersey (the “Outer Physical Address”).

d. Records received from T-Mobile, the service provider for the Outer Phone Number, indicate that “Terri Outer” is the active subscriber of the Outer Phone Number, and has been the subscriber of the Outer Phone Number since at least in or about April 2005.

CONTRABAND DISCOVERED AT FCI OTISVILLE

e. Since in or about February 2024, staff at FCI Otisville have been investigating the smuggling of contraband into the prison.

f. On or about February 8, 2024, FCI Otisville staff seized approximately 7.2 ounces of contraband tobacco, as well as rolling papers, from two FCI Otisville inmates (“Inmate-1” and “Inmate-2,” respectively).

g. On or about August 1, 2025, FCI Otisville staff searched a specific supply room (the “Supply Room”) used by the Health Services Department at FCI Otisville. During that search, the FCI Otisville staff found contraband that included approximately 3.2 pounds of marijuana and 6.7 pounds of loose-leaf tobacco. The marijuana and tobacco are pictured below.



Marijuana Found in FCI Otisville Supply Room



Loose-leaf Tobacco Found in FCI Otisville Supply Room

h. Based on my review of records from FCI Otisville and conversations with FCI Otisville Staff, as of on or about August 1, 2025, two specific inmates at FCI Otisville (“Inmate-3” and “Inmate-4,” respectively) were employed in the prison’s Health Services Department as inmate orderlies. Specifically, Inmate-3 was an inmate orderly from on or about July 28, 2023 to on or about September 12, 2024 and from on or about December 20, 2024 to on or about August 6, 2025; and Inmate-4 was an inmate orderly from on or about October 4, 2024 to on or about

August 6, 2025. During their time as inmate orderlies, Inmate-3 and Inmate-4 had access to the Supply Room. I also understand that OUTER had access to the Supply Room.

i. On or about August 1, 2025, Inmate-3 and Inmate-4 were searched, and prison staff found contraband cellphones in their possession. The cellphone seized from the possession of Inmate-3 (the "Inmate-3 Phone") bore a specific call number ending in 5155 (the "Inmate-3 Phone Number").

COMMUNICATIONS AND PAYMENTS BETWEEN OUTER AND OTHERS

j. Toll records for the Outer Phone Number indicate that OUTER and the Inmate-3 Phone have communicated via text messages and phone calls several dozen times since at least March 13, 2025.

k. Toll Records for the Outer Phone Number also reflect communications between OUTER and phone numbers associated with friends or relatives of current and former FCI Otisville inmates. These include, without limitation, the following:

i. Between on or about January 3, 2025 and on or about August 3, 2025, OUTER had eight contacts with a phone number associated with a specific former FCI Otisville inmate ("Former Inmate-1"). According to FCI Otisville records, Former Inmate-1 was employed in the FCI Otisville Health Services Department from on or about January 3, 2023 through on or about March 2, 2023 and from on or about July 28, 2023 through on or about October 17, 2024.¹

ii. Between on or about January 6, 2024 and on or about May 19, 2024, the Outer Phone Number had approximately 697 contacts with a specific phone number ending in 6690 (the "Individual-1 Phone Number"). According to Federal Bureau of Prisons ("BOP") records, Inmate-1 identified the Individual-1 Phone Number as belonging to his sibling.²

iii. Between on or about January 11, 2024 and on or about March 20, 2025, the Outer Phone Number had approximately 220 contacts with a specific phone number ending in 4111 (the "Individual-2 Phone Number"). According to BOP records, Inmate-1 identified the Individual-2 Phone Number as belonging to someone whom Inmate-1 considered "Other Relation."

l. In reviewing subpoena returns for the Cash App account associated with the Outer Phone Number (the "Outer Cash App Account"), I have identified at least approximately \$163,361 in transfers from individuals who appear to be associated with current and/or former FCI Otisville inmates, based on my review of BOP records, to the Outer Cash App Account. These include, without limitation, the following:

¹ Former Inmate-1 was released from BOP custody in or about October 2024.

² Based on my training, experience, and conversations with BOP staff, I understand that, while incarcerated, federal inmates identify individuals whom they expect to contact them, including the inmates' relationship to those individuals and those individuals' contact information, as a predicate to having telecommunications contact with those individuals.

i. Between in or about January 2024 and in or about October 2024, the Outer Cash App Account received approximately \$23,850 in transfers from Individual-1. As set forth above, according to BOP records, Inmate-1 has identified Individual-1 to BOP as his sibling.

ii. Between in or about April 2024 and in or about August 2024, the Outer Cash App Account received approximately \$35,380 in transfers from a Cash App account bearing the first name of Individual-2. As set forth above, according to BOP records, Inmate-1 has identified Individual-2 to BOP as "Other Relation."

iii. Between in or about September 2024 and in or about October 2024, the Outer Cash App Account received approximately \$19,300 in transfers from Individual-3. According to BOP records, Inmate-1 has identified Individual-3 to BOP as a "Friend."

iv. Between in or about December 2024 and in or about January 2025, the Outer Cash App Account received approximately \$3,200 in transfers from Individual-4. According to BOP records, Inmate-3 has identified Individual-4 to BOP as both a "Friend" and a "Spouse."

v. Between in or about March 2025 and in or about May 2025, the Outer Cash App Account received approximately \$5,600 in transfers from Individual-5. According to BOP records, Inmate-3 has identified Individual-5 to BOP as both a "Sibling" and "Other Relation."

vi. In or about March 2025, the Outer Cash App Account received approximately \$1,000 in transfers from Individual-6. According to BOP records, Inmate-3 has identified Individual-6 to BOP as a "Parent."

vii. Between in or about March 2025 and in or about June 2025, the Outer Cash App Account received approximately \$38,500 in transfers from Individual-7. According to BOP records, Inmate-4 has identified Individual-7 to BOP as "Other Relation." In addition, these Cash App transfers from Individual-7 include "Subjects" that reference, based on my review of BOP records, Inmate-4's documented aliases.

viii. Between in or about June 2025 and in or about July 2025, the Outer Cash App Account received approximately \$4,750 in transfers from Individual-8. At least one of these Cash App transfers from Individual-8 includes a "Subject" that references, based on my review of BOP records, a documented alias of Inmate-4.

ix. In or about July 2025, the Outer Cash App Account received approximately \$6,000 in transfers from Individual-9. According to BOP records, Inmate-4 has identified Individual-9 to BOP as "Other Relation" and a "Friend."

x. Between in or about January 2025 and in or about May 2025, the Outer Cash App Account received approximately \$20,201 in transfers from Individual-10. According to BOP records, another specific FCI Otisville inmate ("Inmate-5") has identified an individual bearing Individual-10's surname to BOP as a "Friend."

m. In reviewing subpoena returns for a specific bank account ending with the numbers 6727 (the "Outer Bank Account") that was opened in the name "Terri Outer" and associated with

the Outer P.O. Box and Outer Physical Address, I have identified, without limitation, the following:

- i. In or about January 2024, the Outer Bank Account was opened.
 - ii. In or about February 2024, the Outer Bank Account received a transfer of approximately \$1,000 from Individual-1. As set forth above, according to BOP records, Inmate-1 has identified Individual-1 to BOP as his sibling.
 - iii. On or about February 7, 2024, records for the Outer Bank Account reflect a debit payment transaction of approximately \$82 at, based on its name, an apparent tobacco shop.
 - iv. On or about February 14, 2024, the Outer Bank Account was closed.
- n. In reviewing information from the Inmate-3 Phone, FCI Otisville staff identified text messages beginning on or about July 25, 2025 between the Inmate-3 Phone and the Outer Phone Number. Those messages generally included discussion about packages that would be shipped by others to the user of the phone bearing the Outer Phone Number, including, without limitation, the following:
- i. On or about July 25, 2025, at approximately 7:01 p.m. UTC, the Inmate-3 Phone asked the Outer Phone Number, in part: "What's up? I checked my side it was all together????"
 - ii. Approximately two minutes later, the Outer Phone Number texted the Inmate-3 Phone: "I will check the house. There were 2 packages which I brought both packages in broken down into 4 because of how big they were."
 - iii. A little under three hours later, at approximately 10:02 p.m. UTC, the Inmate-3 Phone texted the Outer Phone Number, in part: "They said it was 3 (1 with 8 like the one that came another with 8 then one with 7) ok check!"
 - iv. Less than a minute later, the Outer Phone Number texted the Inmate-3 Phone: "Umm there were only 2 which I broke apart into 4. But I will check."
 - v. Approximately 1 minute later, the Inmate-3 Phone texted the Outer Phone Number, in part: "Kopy."
 - vi. A little under four hours later, on or about July 26, 2025 at approximately 1:40 a.m. UTC, the Inmate-3 Phone texted the Outer Call Number, in part: "Here's the receipt so yes please check into that!" accompanied by the following picture of an apparent United States Postal Service receipt for a package:

TRACK STATUS ONLINE
Visit <https://www.usps.com/tracking>
Text and e-mail alerts available

PURCHASE DETAILS

Product	Qty	Unit Price	Price
Priority Mail® Montague, NJ 07827 Weight: 6 lb 7.60 oz Expected Delivery Date Wed 07/23/2025 Tracking #: 9505 5132 2792 5200 6985 49	1		\$14.10
Insurance Up to \$100.00 included			\$0.00
Total			\$14.10

Grand Total: \$14.10

Cash \$20.00
Change -\$5.90

TO REPORT AN ISSUE
Visit <https://email.us.usps.com>

TO FILE AN INSURANCE CLAIM
Visit <https://www.usps.com/help/claims>
If unable to file online, call 1-800-4USPS

Package Receipt Sent from the Inmate-3 Phone to the Outer Phone Number

- vii. A little under a minute later, the Inmate-3 Phone texted the Outer Call Number, in part: "It had 3 in there a towel and the 2 bags of coffee!"
- viii. Approximately four minutes later, the Outer Call Number texted the Inmate-3 Phone: "Hold up, that's what just came?"
- ix. Approximately one minute later, the Inmate-3 Phone responded, in part: "Yes that's what in [sic] I'm talking about!"
- x. Approximately 15 seconds later, the Outer Call Number texted the Inmate-3 Phone: "Yes."
- xi. Approximately 15 minutes later, the Inmate-3 Phone responded, in part: "Ok yes but the numbers ain't right???"

xii. Less than a minute later, the Outer Call Number texted the Inmate-3 Phone: "I have 2 more packages."

xiii. Approximately five minutes later, the Inmate-3 Phone texted the Outer Call Number, in part: "Ok that's what I'm talking bout...so let's take care if (sic) that and I got you in addition to what he gave you!!"

OUTER'S SEARCH AND INTERNET BROWSING HISTORY

o. Based on my review of records from Google for Google accounts associated with the Outer Phone Number, OUTER's search history on Google and internet browsing history include, without limitation, the following:

i. On or about January 6, 2024, OUTER searched Google for the Individual-1 Phone Number. As set forth above, according to BOP records, Inmate-1 has identified Individual-1 to BOP as his sibling.

ii. On or about January 11, 2024, OUTER searched Google for the Individual-2 Phone Number. As set forth above, according to BOP records, Inmate-1 has identified Individual-2 to BOP as "Other Relation."

iii. On or about April 15, 2024, OUTER searched Google for the following queries: "if you wrap tobacco in foil can it be detected through the metal detector"; "if you wrap tobacco in foil can it be detected through a scanner"; and "can tobacco be detected through a prison scanner if wrapped in foil."³

iv. On or about April 19, 2024, OUTER searched Google for the following queries: "can prison scanners see through stainless steel cups"; and "can prison scanner see through cold cups."

v. On or about July 9, 2024, OUTER searched Google for the following query: "does tobacco show up on a jail scanner."

vi. On or about October 21, 2024, OUTER searched Google for Former-Inmate-1 and a known alias of Former-Inmate-1 based on BOP records, and also accessed a news article regarding Former-Inmate-1's release from federal custody.

vii. On or about August 2, 2025, *i.e.*, approximately one day after FCI Otisville staff discovered contraband including tobacco in the Supply Room, OUTER searched Google for the following query: "how to beat a lie detector."

³ Based on my training and experience with BOP and DOJ OIG, as well as my conversations with other law enforcement officers and participation in this investigation, I understand that OUTER had to go through a metal detector and have her belongings go through a scanner before entering FCI Otisville for each shift of work.

viii. On or about August 10, 2025, *i.e.*, approximately nine days after FCI Otisville staff discovered contraband including tobacco in the Supply Room, OUTER searched Google for the following query: "can you get jail time for bringing tobacco into [sic] inmates."

ix. Also on or about August 10, 2025, OUTER visited the website Quora for the following search: "How much time do you get for contributing contraband to a jail."

x. Also on or about August 10, 2025, OUTER visited webpages titled "Penalties for Smuggling Contraband Into Jails and Prisons"; and "Rules for Bringing Contraband into NY Prison."

WHEREFORE, I respectfully request that a warrant be issued for the arrest of TERRI LYNN OUTER and that she be arrested, and imprisoned or bailed, as the case may be.

Ryan Lally (by AEK, w/permission)

RYAN LALLY

Special Agent

Office of the Inspector General, U.S. Department of Justice

Sworn to me by reliable electronic means,
under Federal Rule of Criminal Procedure 4.1
this ^{15th} day of June, 2026.



THE HONORABLE ANDREW E. KRAUSE
United States Magistrate Judge
Southern District of New York