

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

UNITED STATES OF AMERICA

v.

LOUIS LUYTEN, and
PAUL ROBINSON

CRIMINAL COMPLAINT

Mag. No. 09-3536

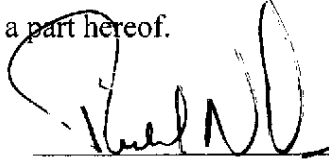
I, Richard N. Orr, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent of the Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.



RICHARD N. ORR, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
March 7, 2009, in the District of New Jersey



HON. MARK FALK
United States Magistrate Judge

ATTACHMENT A

From in or around May 2008 through the present, in Atlantic County, in the District of New Jersey, and elsewhere, the defendants

LOUIS LUYTEN, and
PAUL ROBINSON

did knowingly and intentionally conspire and agree with each other and with others to distribute and possess with the intent to distribute:

- a. five kilograms or more of cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);
- b. a quantity of methamphetamine, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); and
- c. a quantity of oxycodone, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

All in violation of Title 21, United States Code, Section 846.

ATTACHMENT B

I, Richard N. Orr, a Special Agent with the Federal Bureau of Investigation, having conducted an investigation into the information described below, have knowledge of the following facts:

1. During the course of this investigation, an undercover federal law enforcement officer ("UC1") has posed as an individual involved in a variety of illegal activities, including drug distribution, selling stolen and contraband cigarettes, and counterfeit goods. Further, a second undercover law enforcement officer ("UC2") has posed as a drug distributor with ties to international Colombian drug traffickers.
2. On July 14, 2008, UC1 purchased a large amount of suspected ecstasy from two known co-conspirators (CC1 and CC2) of defendants LOUIS LUYTEN and PAUL ROBINSON. On August 18-19, 2008, UC1 purchased a large amount of what UC1 believed was ecstasy from CC1 and CC2. This ecstasy was actually a different Schedule I controlled substance, namely methamphetamine hydrochloride.
3. On February 5, 2009, UC1 and UC2 met with CC1 and ROBINSON at an apartment in Atlantic City. The meeting was recorded on a Closed Circuit Television ("CCTV") system and audio. ROBINSON stated that he had transported CC2 and drugs, including ecstasy, Oxycontin (a brand name for the Schedule II prescription painkiller oxycodone), and marijuana from Canada into the United States on a twin engine Aztec.
4. ROBINSON also stated that he, LUYTEN and two other pilots had smuggled drugs into the United States in the past and wanted to work for Colombian drug importers associated with UC1 and UC2.
5. On or about February 25th, 2009, UE1 and UCE2 met with CC1, ROBINSON, LUYTEN, Mike LNU, and two UCEs from Miami at an apartment in Atlantic City. The meeting was recorded on a Closed Circuit Television ("CCTV") system and audio. During this meeting, Mike told the UCEs that he had been one of the pilots who flew the ecstasy from Canada to the United States in August, 2008. During this meeting ROBINSON and LUYTON negotiated with the UCEs to deliver ten kilos of cocaine from an airport from Florida to an airport in New Jersey. ROBINSON and LUYTEN agreed to transport the cocaine for a flat fee of \$15,000.00.
6. On or about March 5, 2009, LUYTEN and ROBINSON met with UC2 at Lantana airport in Florida. UC2 gave LUYTEN and ROBINSON ten kilogram packages represented to be cocaine. The packages contained a whitish substance resembling cocaine. LUYTEN and ROBINSON were asked to deliver the sham cocaine to UC1 at Ocean City Airport in Ocean City, NJ.

7. LUYTEN and ROBINSON placed the ten kilogram packages into their Piper Apache and took off. Later that day they landed at Ocean City Airport and delivered the ten kilograms to UC1. UCI paid LUYTEN and ROBINSON \$15,000.
8. Since the delivery on March 5th, UC1 has had meetings and telephone conversations with ROBINSON and LUYTEN. ROBINSON and LUYTEN have agreed to fly to an airport in New Jersey on March 14th, 2009 to pick up a load of 50-100 kilograms of cocaine which they would then fly to an airport in Canada.