

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

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Criminal No. 19-
	:	
MATTHEW TORRES	:	18 U.S.C. § 241
	:	18 U.S.C. § 1519

INFORMATION

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

Count 1
(Conspiracy to Deprive Persons of Civil Rights)

1. At all times relevant to Count 1 of this Information:
 - a. Defendant MATTHEW TORRES (“TORRES”) was a police officer employed by the Paterson Police Department (“PPD”) in Paterson, New Jersey.
 - b. Eudy Ramos (“Ramos”), Jonathan Bustios (“Bustios”), Daniel Pent (“Pent”), and PPD Officer 1 were police officers employed by the PPD.
 - c. TORRES, Ramos, Bustios, Pent, and PPD Officer 1 were assigned to the same squad within the PPD and typically worked a shift that began at approximately 4:30 a.m. and ended at approximately 3:45 p.m. On a typical shift, each PPD officer was assigned to patrol a specific area of Paterson. Following each shift, PPD officers were required to report their activities and assignments accurately on a Patrol Activity Log, which they signed and submitted to the PPD.

2. From in or about 2016 to in or about April 2018, in Passaic County, in the District of New Jersey, and elsewhere, defendant

MATTHEW TORRES

knowingly and willfully conspired and agreed with Eudy Ramos, Jonathan Bustios, Daniel Pent, PPD Officer 1, and others to injure, oppress, threaten, and intimidate individuals in Paterson in the free exercise and enjoyment of the rights secured to them by the Constitution and laws of the United States, namely: (a) their right to be free from unreasonable searches and seizures by one acting under color of law; and (b) their right not to be deprived of property without due process of law by one acting under color of law.

Goal of the Conspiracy

3. It was the goal of the conspiracy for TORRES, Ramos, Bustios, Pent, PPD Officer 1, and others (the “Co-Conspirators”), acting under color of law, to: (a) illegally stop and search vehicles and the occupants of those vehicles; (b) illegally stop and search individuals in buildings or on the streets of Paterson; (c) steal money from the individuals who the co-conspirators stopped and searched illegally; and (d) conceal these activities from the PPD by submitting false reports, including false Patrol Activity Logs, that omitted, or lied about, their illegal activities.

Manner and Means

4. It was part of the conspiracy that:

a. While in uniform and on official duty as PPD officers, the Co-Conspirators illegally targeted and stopped certain occupants of vehicles in Paterson who the Co-Conspirators believed carried sums of money.

- b. The Co-Conspirators conducted vehicle stops of those individuals without any legal basis.
- c. The Co-Conspirators searched the motor vehicles and the occupants, without any legal basis.
- d. The Co-Conspirators seized cash from the vehicles' occupants and split the cash proceeds among themselves.
- e. The Co-Conspirators illegally stopped and searched individuals in buildings and on the streets of Paterson, seized cash from those individuals, and split the cash proceeds among themselves.
- f. The Co-Conspirators communicated via text message regarding their criminal conduct. In some instances, they used the code word "mango" in their text messages to refer to cash. For example, on or about February 24, 2018, TORRES and Bustios received a text message from Ramos that stated, "Who's in the mood for weekend mangoes[?]," asking whether the Co-Conspirators were interested in stealing cash from individuals in Paterson that weekend.
- g. The Co-Conspirators submitted false police reports to the PPD, including false Patrol Activity Logs, incident reports, and offense reports, that either omitted the illegal stops, searches, and cash seizures, or affirmatively lied about them.
- h. The Co-Conspirators conducted these illegal activities outside of the areas of Paterson that they had been assigned to patrol.
- i. For example, on or about December 7, 2017, TORRES and Ramos, while on duty and in uniform, stopped and searched a vehicle, in Paterson,

detained the driver and the passenger of the vehicle, and stole at least \$800 from the passenger. TORRES and Ramos falsely advised the passenger that there was a warrant for the passenger's arrest, when, in fact, there was not. TORRES and Ramos were told by the passenger that the passenger had a small quantity of marijuana on him. The passenger also had approximately \$3,100 in cash. TORRES and Ramos told the passenger that they could charge the passenger with marijuana distribution, or, instead, TORRES and Ramos could confiscate \$500 and the passenger could sign a piece of paper. Ramos purportedly telephoned a superior officer and then told the passenger that, in fact, it would cost the passenger \$800, instead of \$500. Ramos handed the passenger a piece of paper to sign. TORRES and Ramos took at least \$800 from the passenger, released the passenger, and then split the stolen money between themselves. TORRES and Ramos each signed and submitted Patrol Activity Logs to the PPD for their December 7, 2017 shift. They concealed their theft of monies from the passenger by omitting any mention of the incident on their Patrol Activity Logs.

In violation of Title 18, United States Code, Section 241.

Count 2
(Falsification of a Record)

1. The allegation set forth in paragraphs 1 and 4 of Count 1 of this Information are realleged and incorporated as if set forth herein.

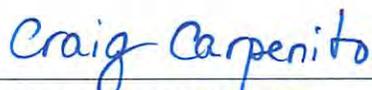
2. Conspiracy and substantive offenses involving the deprivation of civil rights, to include the right to be free from unreasonable searches and seizures, and the right not to be deprived of property without due process of law, by a person acting under color of law, contrary to Title 18, United States Code, Sections 241 and 242, are matters within the jurisdiction of the Federal Bureau of Investigation (the "FBI"), which is an agency within the United States Department of Justice.

3. On or about December 7, 2017, in Passaic County, in the District of New Jersey, and elsewhere, defendant

MATTHEW TORRES

in relation to and in contemplation of a matter within the jurisdiction of the FBI, an agency of the United States, knowingly concealed, covered up, falsified, and made a false entry in a Paterson Police Department Patrol Activity Log with the intent to impede, obstruct and influence the investigation and proper administration of such matter, that is, TORRES submitted a Patrol Activity Log that entirely omitted that he and Ramos stopped and searched a vehicle, detained the driver and passenger of the vehicle, and stole at least \$800 from the passenger of the vehicle.

In violation of Title 18, United States Code, Section 1519.



CRAIG CARPENITO
United States Attorney

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UNITED STATES OF AMERICA

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INFORMATION FOR

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