

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA :
 :
 v. : Criminal No. 10 -
 :
 JASON STETSER : 18 U.S.C. § 241
 :

INFORMATION

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

1. At all times relevant to this Information, the Camden Police Department (hereinafter, the “Camden PD”) was a law enforcement agency charged with protecting and serving the residents of Camden, New Jersey, as well as any individual who may visit that City.

2. In or about January 2003, defendant Jason Stetser entered the Camden County Police Academy as a recruit for the Camden PD. The Camden County Police Academy performed, among other things, basic law enforcement education and training for recruits for the Camden PD. Recruits, including defendant Jason Stetser, were instructed in areas of police procedure, New Jersey criminal statutes, search and seizure, procedures for handling evidence, the constitutions of both United States and New Jersey, and proper morals and ethics of a law enforcement officer. Defendant Jason Stetser successfully completed his training and began his service as a sworn police officer for the Camden PD on or about June 27, 2003. Defendant Jason Stetser initially was assigned to Patrol Division, Platoon #4, District #4 and assigned badge number 315. On or about July 28, 2008, defendant Jason Stetser was re-assigned to the Special Operations Division, Platoon #4 (hereinafter, “4th Platoon”).

3. At times relevant to this Information:

a. Prior to July 30, 2008, the Camden PD deployed officers primarily by responding to calls for service and performing random patrols. Tactical units also addressed high crime areas with more targeted operations. After July 30, 2008, the Camden PD redeployed officers to implement a targeted enforcement strategy employing directed patrols aimed at addressing high-crime areas within Camden as determined by mapping and statistical analysis.

b. For organizational purposes, Camden was divided into Districts and each District was divided into Sectors. Officers were organized into Platoons, with a number of Platoons responsible for each District. Regardless of the Sector to which an officer was assigned, the officer would provide assistance to other officers in other Sectors or Districts when needed.

c. Generally, a Platoon consisted of one Lieutenant, two Sergeants and approximately 11 Patrolman. Patrolman assigned to a Platoon wore police uniforms, drove marked police vehicles (sedan or van) and conducted patrols.

d. During part of this period that defendant Jason Stetser was assigned to 4th Platoon, Officers #1, #2 and #4, as well as co-conspirator Kevin Parry, also were assigned to 4th Platoon. Officer #1 was a supervising officer. Officer #4, who graduated in the same academy class as co-conspirator Kevin Parry, often was partnered with Officer #2 in their official assignments, while defendant Parry often was partnered with defendant Jason Stetser.

CONSPIRACY TO DEPRIVE OTHERS OF CIVIL RIGHTS

4. Between in or about May 2007 and on or about October 28, 2009, at Camden, in the District of New Jersey, and elsewhere, defendant

JASON STETSER,

while acting under color of the laws of the State of New Jersey, did knowingly and willfully conspire and agree with others, including Officers #1, #2 and #4, as well as co-conspirator Kevin Parry, to injure, oppress, threaten, and intimidate persons in the State of New Jersey, in the free exercise and enjoyment of rights and privileges secured by the Constitution and laws of the United States, namely the right not to be deprived of liberty without due process of law, to include the right to be free from unreasonable searches and seizures and to be free from the intentional use of unreasonable force by one acting under color of law.

Object of the Conspiracy

5. It was the object of the conspiracy for defendant Jason Stetser and his co-conspirators, including Officers #1, #2 and #4, and co-conspirator Kevin Parry, to deprive individuals of their due process rights, by the following methods and means:

- a. Planting evidence and charging individuals based upon the planted evidence;
- b. Threatening individuals with arrest based upon planted evidence, unless these individuals provided cooperation to law enforcement on other matters;
- c. Seizing property, most often drugs, and thereafter not reporting the seizure, or incorrectly reporting the seized amounts, so that the drugs could be used at a later time to plant on individuals;

- d. Adding drugs to the amounts seized during arrests in order to make the arrests appear more significant and expose the arrestees to greater penalties;
- e. Stealing drugs or money from individuals or during unlawful searches to use for personal purposes;
- f. Exchanging illegal drugs for cooperation or information;
- g. Intentionally using unreasonable force to conduct one or more other methods or means of the conspiracy; and
- h. Falsifying police reports, testifying falsely under oath or intentionally failing to testify, to conceal their actions.

Unlawful Conduct

6. It was a part of the conspiracy that on or about December 27, 2007, defendant Jason Stetser and co-conspirator Kevin Parry unlawfully searched the residence of A.R. in Camden and subsequently arrested A.R. based upon evidence obtained during an illegal warrantless search. Thereafter, defendant Jason Stetser authored a police report containing false and misleading facts and statements to conceal their unlawful actions. When subpoenaed to do so, on or about July 29, 2008, co-conspirator Kevin Parry testified falsely under oath in the Superior Court of New Jersey at a hearing in connection with the arrest of A.R. to further conceal their unlawful actions.

7. It was a further part of the conspiracy that on or about May 19, 2008, defendant Jason Stetser and co-conspirators Officer #1 and Kevin Parry unlawfully searched a residence in Camden and subsequently arrested S.B. based upon evidence obtained during the illegal warrantless search. Thereafter, defendant Jason Stetser authored a police report containing false

and misleading facts and statements to conceal their unlawful actions.

8. It was a further part of the conspiracy that on or about August 30, 2008, defendant Jason Stetser and co-conspirators Officers #1, #2 and #4, and co-conspirator Kevin Parry unlawfully arrested A.C. in Camden, based upon evidence obtained from an illegal search, and stole money found during the illegal search. Thereafter, defendant Jason Stetser authored a police report containing false and misleading facts and statements to conceal their unlawful actions.

9. It was a further part of the conspiracy that on or about September 14, 2008, defendant Jason Stetser and co-conspirators Officers #1 and #2 and co-conspirator Kevin Parry unlawfully searched various residences in the Winslow Court Apartments in Camden and stole money found during those searches. Thereafter, Officer #2 authored a police report containing false and misleading facts and statements to conceal their unlawful actions.

10. It was further part of the conspiracy that on or about September 17, 2008, defendant Jason Stetser and co-conspirators Officers #1, #2 and #4 and co-conspirator Kevin Parry unlawfully arrested D.B. in Camden, based upon evidence obtained from an illegal search and planted evidence, and stole money found during the illegal search. Thereafter, Officer #2 authored a police report containing false and misleading facts and statements to conceal their unlawful actions.

11. It was a further part of the conspiracy that on or about September 17, 2008, defendant Jason Stetser and co-conspirators Officer #2 and #4 and co-conspirator Kevin Parry arrested T.R. and A.F. for suspected drug distribution. Thereafter, defendant Jason Stetser and co-conspirators Officer #2 and #4 and co-conspirator Kevin Parry added an additional quantity of

drugs to the original drugs which were not directly attributable to T.R. and A.F. or the events of September 17, 2008. Thereafter, Officer #4 authored a police report containing false and misleading facts and statements to conceal their unlawful actions.

12. It was a further part of the conspiracy that on or about December 25, 2008, defendant Jason Stetser and co-conspirator Kevin Parry arrested T.T. for suspected drug distribution activities and possession of narcotics. Thereafter, defendant Jason Stetser and co-conspirator Kevin Parry added an additional quantity of drugs to the original drugs found which were not directly attributable to T.T. or the events of December 25, 2008. Thereafter, defendant Jason Stetser authored a police report containing false and misleading facts and statements to conceal their unlawful actions.

13. It was a further part of the conspiracy that on or about January 27, 2009, defendant Jason Stetser and co-conspirators Officers #2 and #4 and co-conspirator Kevin Parry unlawfully searched a residence in Camden where R.M. was located and subsequently caused the arrest of R.M. based upon false information. Thereafter, Officer #4 authored a police report containing false and misleading facts and statements to conceal their unlawful actions.

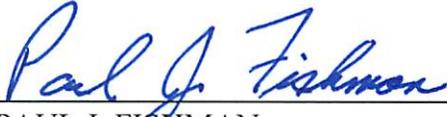
14. It was a further part of the conspiracy that on or about April 3, 2009, defendant Jason Stetser and co-conspirators Officers #2 and Kevin Parry unlawfully searched a vehicle occupied by L.M. in Camden and subsequently arrested L.M. based upon planted evidence. Thereafter, Officer #2 authored a police report containing false and misleading facts and statements to conceal their unlawful actions.

15. It was a further part of the conspiracy that on or about August 21, 2009, defendant Jason Stetser and co-conspirators Officers #2 and Kevin Parry unlawfully searched the residence

of J.M. in Camden and arrested J.M. Thereafter, Officer #2 authored a police report containing false and misleading facts and statements to conceal their unlawful actions.

16. It was a further part of the conspiracy that on or about June 25, 2008, defendant Jason Stetser and co-conspirator Kevin Parry arrested M.C. and A.W. for suspected drug distribution based upon planted evidence. Thereafter, co-conspirator Kevin Parry authored a police report containing false and misleading facts and statements to conceal their unlawful actions.

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



PAUL J. FISHMAN
United States Attorney

CASE NUMBER: 2009R00593

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