

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

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Criminal No. 21-
	:	
ANGEL CHAPARRO	:	18 U.S.C. § 1519
	:	18 U.S.C. § 2

INFORMATION

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

Count 1
(Falsification of Record)

1. At all times relevant to this Information:
 - a. Defendant ANGEL CHAPARRO (“CHAPARRO”) was a Correctional Officer employed at the Essex County Correctional Facility (“ECCF”) in Newark.
 - b. Damion James and Luis Ortiz were Correctional Officers employed at ECCF.
 - c. Herman Pride and Supervisor 1 were Sergeants employed at ECCF.
 - d. Supervisor 2 was a Lieutenant employed at ECCF.
 - e. The Victim was a federal pretrial detainee housed at ECCF.
- The Victim had been charged by federal criminal complaint with conspiracy to distribute fentanyl and heroin.

2. On or about August 17, 2020:
 - a. The Victim squirted a correctional officer with a substance consisting of urine, yogurt, and milk.
 - b. Defendant CHAPARRO, Ortiz, James, Supervisor 1, and Supervisor 2 subsequently transported the Victim to a disciplinary cell. As they approached the disciplinary cell, Pride joined them.
 - c. Defendant CHAPARRO, Ortiz, James, and Pride entered the disciplinary cell with Victim 1. Supervisor 1 and Supervisor 2 stood outside of the cell and looked into it.
 - d. Inside the disciplinary cell, defendant CHAPARRO, Ortiz, and James began to conduct a strip search of Victim 1. They never completed it. During the strip search, in retaliation for the Victim's conduct, James began striking the Victim repeatedly in the chest, head, and face, causing the Victim bodily injury. Defendant CHAPARRO, Ortiz, Pride, Supervisor 1, and Supervisor 2 witnessed the assault. No one intervened to stop it. At the end of the assault, Pride stated, "that's enough."
 - e. After the assault, defendant CHAPARRO, Ortiz, Pride, James, Supervisor 1, and Supervisor 2 met in Pride's office. Defendant CHAPARRO was given a blank "Strip/Body Cavity Search Report" (the "Report") to sign, and defendant CHAPARRO signed the Report above the line "Reporting Officer." Supervisor 1 then filled out and submitted the Report with defendant CHAPARRO's signature affixed to it, and Supervisor 1 signed the Report in the

section titled "Authorizing Supervisor." Supervisor 1 was not allowed to both write the report and approve it.

f. The Report was false in at least the following ways:

(i) defendant CHAPARRO falsely signed the Report as the "Reporting Officer," when, in fact, Supervisor 1 filled out the Report after defendant CHAPARRO had signed a blank version; (ii) by signing the Report, defendant CHAPARRO falsely indicated that a strip search of Victim 1 had been completed, when, in fact, the officers never completed a strip search of Victim 1; and (iii) in the section of the report titled, "If applicable, Reason for Use of Force," Supervisor 1 wrote, "N/A," creating the false pretense that no force had been used against the Victim, when, in fact, James had assaulted the Victim, while defendant CHAPARRO, Ortiz, Pride, Supervisor 1, and Supervisor 2 watched and did not intervene.

g. During the meeting in Pride's office, Supervisor 1 instructed the officers to remain quiet about the assault of Victim 1 so that no one would find out about it.

h. None of the officers filed written reports documenting the use of physical force against the Victim.

3. Conspiracy and substantive offenses involving the deprivation of civil rights, to include the right of pretrial detainees to be free from unreasonable force by a correctional officer, 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.

4. On or about August 17, 2020, in Essex County, in the District of New Jersey, and elsewhere, defendant

ANGEL CHAPARRO,

in relation to and in contemplation of a matter within the jurisdiction of the FBI and the United States Department of Justice, knowingly concealed, covered up, falsified, and made a false entry in the Report as set forth in paragraph 2(f) of this Information with the intent to impede, obstruct and influence the investigation and proper administration of such matter.

In violation of Title 18, United States Code, Sections 1519 and 2.



RACHAEL A. HONIG
Acting United States Attorney