

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Mark Falk
v. : Mag. No. 14-3584
RALPH E. MATA, : CRIMINAL COMPLAINT
a/k/a "Ralph E. Mata, Jr." :
a/k/a "The Milk Man" :
Defendant.

I, James F. Farley, the undersigned complainant being duly sworn, state 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 with the Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHMENT B

Continued on the attached page and made a part hereof.



James F. Farley
Special Agent
Federal Bureau of Investigation

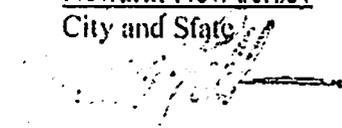
Sworn to before me and subscribed in my presence,

April 2, 2014
Date

at

Newark, New Jersey
City and State

Hon. Mark Falk
United States Magistrate Judge


Signature of Judicial Officer

ATTACHMENT A

COUNT 1

From in or about November 2011, through on or about June 1, 2013, in Bergen and Passaic Counties, in the District of New Jersey, and elsewhere, the defendant,

RALPH E. MATA,
a/k/a "Ralph E. Mata, Jr.,"
a/k/a "The Milk Man"

did knowingly and intentionally aid and abet the commission of an offense against the United States, namely a conspiracy to distribute and to possess with intent to distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1), (b)(1)(A).

In violation of Title 21, United States Code, Section 846 and Title 18, United States Code, Section 2.

COUNT 2

From in or about November 2011, through on or about June 1, 2013, in Bergen and Passaic Counties, in the District of New Jersey, and elsewhere, the defendant,

RALPH E. MATA,
a/k/a "Ralph E. Mata, Jr.,"
a/k/a "The Milk Man"

did knowingly and intentionally conspire and agree with others to distribute and to possess with intent to distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1), (b)(1)(A).

In violation of Title 21, United States Code, Section 846.

COUNT 3

From in or about November 2011, through on or about June 1, 2013, in Bergen County, in the District of New Jersey, and elsewhere, the defendant,

RALPH E. MATA,
a/k/a "Ralph E. Mata, Jr.,"
a/k/a "The Milk Man"

did knowingly engage and attempt to engage in monetary transactions in criminally derived property of a value greater than \$10,000 and was derived from specified unlawful activity, that is, the distribution of controlled substances, while in the United States.

In violation of Title 18, United States Code, Section 1957 and Section 2.

ATTACHMENT B

I, James F. Farley, am a Special Agent with the Federal Bureau of Investigation, and I am fully familiar with the facts set forth herein based on my own investigation and my conversations with other agents, and members of law enforcement and my review of their reports and of items of evidence. Where statements of others are related herein, they are related in substance and in part. Since this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation.

1. Since in or about January 2012, law enforcement has been investigating an international drug trafficking organization ("DTO") that has been distributing narcotics in New Jersey and elsewhere. The investigation has revealed that the DTO has been importing narcotics from such places as Ecuador and the Dominican Republic by secreting the narcotics inside shipping containers containing pallets of produce, including bananas. To date, law enforcement officers have seized approximately 160 kilograms of cocaine from the DTO. As part of the investigation, law enforcement officers have gathered information from numerous sources, including but not limited to confidential informants, cooperating witnesses, travel records, bank records, lawfully recorded conversations, and searches of law enforcement databases. This investigation has revealed that RALPH E. MATA has assisted members of the DTO in various ways, as set forth below. RALPH E. MATA communicated with several members of the DTO over the telephone and by meeting in person. On at least one occasion, RALPH E. MATA sent a text message to a member of the DTO, which he signed "The Milk Man."

2. Since approximately November 1992, RALPH E. MATA has been employed with the Miami-Dade Police Department in various capacities, including as a lieutenant in the Investigations Unit where he directed all investigations for the Miami Gardens police district and was responsible for implementing strategies and police methods that resulted in the identification and dismantling of two major drug gangs in the City of Miami Gardens. His professional training included courses in narcotics investigations and advanced narcotics investigations. From approximately May 2006 through March 2010, RALPH E. MATA was a lieutenant with the K-9 Unit at the Miami International Airport, where he utilized trained canines to search aircraft, facilities and vehicles. In or about March 2010, RALPH E. MATA became a lieutenant with the Professional Compliance Bureau-Internal Affairs with the Miami-Dade Police Department.

Mata Provided Firearms to the DTO

3. In or about the end of 2011, threats were made to kill members of the DTO and their families by rival drug dealers. As a result of those threats, members of the DTO wanted to ward off the individuals who were threatening them and their families. Accordingly, members of the DTO consulted with RALPH E. MATA and asked for his assistance. During the course of meetings between members of the DTO and RALPH E. MATA, the parties discussed the best way to mitigate the threats against the DTO members. One solution that the parties contemplated entailed planting narcotics on the individuals issuing the threats. Another idea that the parties considered was hiring assassins to kill the individuals. RALPH E. MATA and members of the DTO discussed this murder plot on at least four occasions during the time frame of this conspiracy. RALPH E. MATA stated that his contacts (i.e., the assassins) would wear uniforms and badges to make it appear as though the targets of the murder plot were lawfully being pulled over by law enforcement, after which the targets would be shot and killed. In furtherance of this murder plot, RALPH E. MATA arranged for two assassins to kill the

individuals for approximately \$300,000 (\$150,000 per individual). Ultimately, the DTO decided not to move forward with the murder plot. However, because RALPH E. MATA already had traveled to New York to give the assassins a box of cigars and pay the assassins \$5,000 for their willingness to kill the individuals, RALPH E. MATA was reimbursed by the DTO for the \$5,000 payment to the assassins and also was paid for his assistance, as set forth in paragraph 13, below.

4. As a result of the various threats lodged against the members of the DTO, and for purposes of providing protection and security to the DTO members in the Dominican Republic, RALPH E. MATA purchased several firearms. RALPH E. MATA used his contacts at the Miami International Airport to transport those firearms from Miami, Florida to the Dominican Republic. In total, RALPH E. MATA provided approximately six firearms to members of the DTO in the Dominican Republic. The firearms were transported on two separate trips from Miami to the Dominican Republic between on or about October 5, 2012 and on or about January 17, 2013. Travel records confirm that RALPH E. MATA traveled from Miami to the Dominican Republic on multiple occasions during that time frame. During each of the trips, with the assistance of a colleague who was working at the Miami International airport at that time, RALPH E. MATA transported the firearms in his carry-on suitcase. Specifically, the firearms consisted of a rifle that could be broken down into three parts, several pistols, and some ammunition. RALPH E. MATA was reimbursed by a member of the DTO for the cost of these firearms and given additional money for purchasing and smuggling these firearms.

5. According to records obtained as part of the investigation, RALPH E. MATA purchased firearms on the following dates: (a) on or about June 14, 2012, RALPH E. MATA used his Miami-Dade Police Department badge, among other identification, to purchase a Sig Sauer rifle (serial # 20C002547); (b) on or about August 17, 2012, RALPH E. MATA used his Miami-Dade Police Department badge, among other identification, to purchase a Sig Sauer, nine-caliber pistol (serial # UU705595); (c) on or about October 4, 2012, RALPH E. MATA purchased three nine-caliber Glock pistols (serial # TMP706; serial # TMP707; serial # TMP708); and (d) on or about November 14, 2012, RALPH E. MATA purchased three more nine-caliber Glock pistols (serial # TVM680; serial # TVM681; serial # TVM682).

6. As part of this investigation, on or about November 6, 2013, law enforcement agents in the Dominican Republic recovered three firearms from the DTO, specifically a rifle (serial # 20C002547), a Sig Sauer nine-caliber pistol (serial # UU705595), a nine-caliber Glock pistol (serial # TMP708), and hollow-point bullets, which are expanding bullets that have a pit or hollowed out shape in its tip often intended to cause the bullet to expand upon entering a target in order to decrease penetration and maximize tissue damage and blood loss or shock. As set forth in paragraph 5 above, these three firearms were purchased by RALPH E. MATA.

Mata Investigated Seizure of Narcotics Proceeds for the DTO

7. On or about January 12, 2012, law enforcement, including agents of the U.S. Drug Enforcement Administration ("DEA") seized approximately \$419,000 in narcotics proceeds from a residence used by members of the DTO located in Bergen County, New Jersey ("Bergen County Residence"). Once the money was seized, DEA left behind a receipt which documented the seizure.

8. The investigation has revealed that members of the DTO suspected that the \$419,000 had been stolen by another member of the DTO. Consequently and on behalf of the DTO, RALPH E. MATA used sources of information available to him in his capacity as a law

enforcement officer to investigate the seizure of the \$419,000 in narcotics proceeds from the Bergen County Residence. After doing so, RALPH E. MATA reported back to members of the DTO that the money had not been stolen by a member of the DTO, but rather law enforcement, specifically a DEA agent who worked in Paterson, New Jersey, had seized the \$419,000 from the Bergen County Residence.

9. The investigation revealed that, on or about January 20, 2012, approximately \$315,000 in narcotics proceeds was provided by a member of the DTO to another DTO member in New Jersey. On or about January 21, 2012, law enforcement in South Carolina conducted a traffic stop of the vehicle being driven by that DTO member. A narcotics-detecting canine subsequently inspected the car and positively alerted law enforcement to the presence of a controlled substance in the car. As a result, law enforcement searched certain bags within the vehicle and found approximately \$311,000 inside two separate bags. During the search, law enforcement also recovered a DEA-issued receipt, which documented the January 12, 2012 seizure of approximately \$419,000 from the Bergen County Residence, referenced in paragraph 7, above. RALPH E. MATA was shown the DEA-issued receipt by at least one member of the DTO, and RALPH E. MATA confirmed that the name of the DEA agent that appeared on the receipt, in fact, was employed by the DEA, and according to RALPH E. MATA's sources, the seizure of the \$419,000 was legitimate.

Mata Helped Transport Narcotics Proceeds for the DTO

10. Several months after the seizures of the \$419,000 and \$311,000, RALPH E. MATA traveled with a member of the DTO from Miami, Florida to New York, New York. The sole purpose of this trip was so that the member of the DTO could retrieve narcotics proceeds from another member of the DTO and transport those narcotics proceeds from New York to the Dominican Republic. RALPH E. MATA was aware of the trip's purpose and knew that narcotics proceeds were going to be transported from New York to the Dominican Republic. RALPH E. MATA saw the narcotics proceeds (a total of approximately \$150,000) at the hotel in New York. Travel records confirm that RALPH E. MATA traveled from Miami International Airport to LaGuardia airport in New York on or about July 15, 2012, and the following day, RALPH E. MATA and the DTO member traveled together on a commercial airline flight from John F. Kennedy airport in New York to the Dominican Republic. Although RALPH E. MATA did not personally transport the narcotics proceeds, RALPH E. MATA was given approximately \$5,000 for accompanying the DTO member during the successful transportation of the narcotics proceeds on this July 2012 trip.

11. RALPH E. MATA received additional payments for assisting the DTO with the transportation of narcotics proceeds. Specifically, RALPH E. MATA received a Submariner, stainless steel Rolex watch, valued at approximately \$10,000, by a member of the DTO. The Rolex watch was given to RALPH E. MATA because RALPH E. MATA assisted the DTO with the successful transportation of narcotics proceeds through the airport. More specifically, when the narcotics proceeds were transported from New York to the Dominican Republic, RALPH E. MATA contacted an individual at the John F. Kennedy airport to ensure that the member of the DTO who was carrying those proceeds passed through security without being stopped by law enforcement.

Mata Proposed Narcotics Distribution Routes

12. Between approximately July 2012 and April 2013, in an effort to further the narcotics conspiracy and to ingratiate himself with members of the DTO, RALPH E. MATA suggested that the DTO use the following methods to distribute narcotics: (a) utilize the ports around Miami, Florida to import cocaine because there were specific time periods when the United States Coast Guard conducted training modules – information which RALPH E. MATA could obtain in his capacity as a law enforcement officer and provide to members of the DTO – thereby making detection by law enforcement of any cocaine-laden vessels less likely; and (b) RALPH E. MATA offered to personally transport cocaine from Florida to New Jersey. Additionally, RALPH E. MATA offered to follow the narcotics shipments from Miami, Florida to New Jersey to ensure that the cocaine shipments arrived safely in New Jersey. RALPH E. MATA further suggested that he could help transport the cocaine shipments while accompanied by a former narcotics-detecting canine, so that if RALPH E. MATA was stopped by law enforcement while en route to New Jersey, RALPH E. MATA would show his Miami-Dade Police Department badge and explain that he was traveling with the narcotics-detecting canine for a training course.

Mata Deposited Narcotics Proceeds

13. In March 2013, RALPH E. MATA traveled from Miami to New York/New Jersey for the sole purpose of retrieving \$60,000 in narcotics proceeds from members of the DTO. Of that \$60,000, \$40,000 constituted payment to RALPH E. MATA because RALPH E. MATA assisted the DTO by meeting with the assassins (even though the murder plot was never carried out) and by assisting at least one other member of the DTO with the transportation of narcotics proceeds through the Miami International Airport and elsewhere. RALPH E. MATA was instructed to hold on to the remaining \$20,000 on behalf of the DTO. The investigation revealed that the following day, RALPH E. MATA went to Fort Lee, New Jersey to deposit some of these proceeds at three separate banks, including a Bank of America branch location and a J.P. Morgan Chase bank branch location. Immediately after RALPH E. MATA made the various bank deposits, RALPH E. MATA traveled to the LaGuardia Airport in New York.

14. According to bank records obtained during this investigation, the following deposits were made on March 29, 2013 in Fort Lee, New Jersey: (a) a \$10,000 cash deposit into a Bank of America account held in the name of Ralph E. Mata; and (b) a \$10,000 cash deposit into a J.P. Morgan Chase account held in the name of Ralph E. Mata, Jr. and an individual whose initials are C.A.V. Surveillance photographs taken from the J.P. Morgan Chase branch location in Fort Lee, New Jersey depict RALPH E. MATA handing a large stack of cash to the bank teller on March 29, 2013 at approximately 11:17 a.m. and holding another large wad of cash at approximately 11:21 a.m.

15. Travel records confirm that RALPH E. MATA flew from Miami International Airport to LaGuardia Airport on March 28, 2013 on American Airlines flight 1858 and returned to Miami International Airport from LaGuardia Airport the following day onboard American Airlines flight 1073, which departed New York at approximately 1:45 p.m.

16. Additionally, a drug and money ledger was seized as part of this investigation. On one of the pages of the drug/money ledger, the name “Mata” appears next to the number “60”. Information gathered over the course of the investigation has revealed that this entry in the ledger signifies that RALPH E. MATA was provided \$60,000 in narcotics proceeds.

Mata Provided the DTO with Sensitive Law Enforcement Information

17. On or about April 26, 2013, several members of the DTO were arrested in New Jersey following the seizure of approximately 160 kilograms of cocaine (net weight). As word of the seizure and arrests spread that day, members of the DTO shared the information with others, including RALPH E. MATA. More specifically, on or about April 26, 2013, RALPH E. MATA told another member of the DTO that he would try to find out what happened. Later that same day, RALPH E. MATA reported back to the same DTO member that he could not find anything about the arrest. Further, RALPH E. MATA told this individual that there was no reason for that individual to be concerned. Law enforcement officers believe that RALPH E. MATA reached this conclusion after gathering information from sources available to him in his capacity as a law enforcement officer with the Miami-Dade Police Department. More specifically, according to records obtained as part of this investigation, on or about April 26, 2013, an employee at the Miami Beach Police Department ran a records check, which would have confirmed whether there were any arrest warrants lodged against this particular member of the DTO.

18. Additionally, the investigation revealed that the following day RALPH E. MATA received an email which contained a copy of a business card that was left at the residence of a DTO member after that home was searched. The business card belonged to a Special Agent with the U.S. Department of Homeland Security, Immigration and Customs Enforcement, which the agent had left at the residence following the search.