

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.  
 :  
 v. : Criminal No. 14-\_\_\_\_  
 :  
 STEPHON SOLOMON : 18 U.S.C. § 1951(a)

INFORMATION

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

Introduction

1. At certain times relevant to this Information:
  - a. Defendant STEPHON SOLOMON ("SOLOMON") was a Corrections Officer with the Essex County Correctional Facility ("Essex County Jail") in Newark, New Jersey.
  - b. D.D., a co-conspirator not named as a defendant herein, resided in Newark, New Jersey.
  - c. D.H., a co-conspirator not named as a defendant herein, resided in Newark, New Jersey.
  - d. Q.N., a co-conspirator not named as a defendant herein, was a federal pretrial detainee at the Essex County Jail. Q.N. had been charged by federal criminal complaint with the theft of a motor vehicle by force and the use of a firearm in furtherance of a crime of violence.

e. The Essex County Jail was a facility in New Jersey that held federal pretrial detainees by direction of, or pursuant to, a contract or agreement with the United States Attorney General.

The Conspiracy

2. From in or about September 2013 through in or about May 2014, in Essex County, in the District of New Jersey, defendant

STEPHON SOLOMON

did knowingly and intentionally conspire and agree with D.D., D.H., Q.N., and others to obstruct, delay, and affect interstate commerce by extortion under color of official right, by accepting corrupt payments that were paid and to be paid by another, with that person's consent, in exchange for SOLOMON's official action and assistance in violation of his official duties at the Essex County Correctional Facility as specific opportunities arose.

Object of the Conspiracy

3. The object of the conspiracy was for SOLOMON to receive payments in exchange for smuggling contraband, including cellular telephones and marijuana, into the Essex County Jail for distribution to inmates.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that:

a. D.D. and D.H. collected contraband, including a cellular telephone manufactured outside of New Jersey, to be smuggled

into the Essex County Jail by defendant STEPHON SOLOMON, in exchange for payment.

b. Defendant STEPHON SOLOMON received contraband, including cellular telephones and marijuana, from D.D., for delivery to Q.N. and other inmates at the Essex County Jail.

c. Defendant STEPHON SOLOMON received cash bribes from D.D. for defendant STEPHON SOLOMON's assistance in smuggling contraband into the Essex County Jail, including a cash bribe payment on or about April 17, 2014.

d. Defendant STEPHON SOLOMON smuggled the contraband into the Essex County Jail and delivered it to Q.N, including a package containing a cellular telephone on or about April 18, 2014.

e. Q.N. sold the contraband to other inmates at the Essex County Jail and accepted payments from those inmates via Western Union money transfers.

f. D.D. collected the Western Union money transfers sent on behalf of inmates at the Essex County Jail who ordered contraband from Q.N.

In violation of Title 18, United States Code, Section 1951(a).

*Paul J. Fishman/rah*

PAUL J. FISHMAN  
United States Attorney

CASE NUMBER: 14-

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INFORMATION FOR

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PAUL J. FISHMAN

*U. S. ATTORNEY*

*NEWARK, NEW JERSEY*

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