

RECEIVED*By ShaniquaSmith at 8:20 pm, Nov 15, 2022*

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Esther Salas
	:	
v.	:	Crim. No. 21-925
	:	
ANDREA TORRES,	:	8 U.S.C. § 1324(a)(1)(A)(v)(I)
REGINA JOHNSON, and	:	
PHILIP TORRES	:	

SUPERSEDING INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark,
charges as follows:

COUNT ONE
(Conspiracy to Harbor Certain Aliens)

THE CONSPIRACY

1. At all times relevant to Count One of this Superseding Indictment:
 - a. Defendant ANDREA TORRES was a resident of New Jersey.
 - b. Defendant REGINA JOHNSON was a resident of New Jersey.
 - c. Defendant PHILIP TORRES was a resident of New Jersey and the son of defendant ANDREA TORRES.
 - d. Non-Citizen-1 was a citizen of a foreign country seeking permanent residence in the United States.
 - e. Spouse-1 was a U.S. citizen ("U.S. Spouse-1").

2. From in or around September 2016 through in or around July 2019, in Essex County, in the District of New Jersey, and elsewhere, defendants,

**ANDREA TORRES,
REGINA JOHNSON, and
PHILIP TORRES,**

conspired with each other and others to encourage and induce one or more aliens to come to, enter, and reside in the United States, knowing and in reckless disregard of the fact that such coming to, entry, and residence in the United States was or would have been in violation of the law, and did so for the purpose of commercial advantage and private financial gain, contrary to Title 8, United States Code, Section 1324(a)(1)(A)(iv).

OBJECT OF THE CONSPIRACY

3. It was the object of the conspiracy for defendants ANDREA TORRES, REGINA JOHNSON, and PHILIP TORRES to attain commercial advantage and private financial gain by arranging sham or fraudulent marriages between non-citizens and U.S. citizens to allow the non-citizens to obtain legal residency in the United States, knowing that the non-citizens were not otherwise permitted to legally remain in the United States.

MANNER AND MEANS OF THE CONSPIRACY

4. It was part of the conspiracy that the defendants:

a. Charged the non-citizens a substantial fee for the service of arranging the sham or fraudulent marriages;

b. Recruited and caused money to be paid to U.S. citizens in order to induce them to enter into the sham marriages that the defendants arranged for the non-citizens;

c. Assisted the non-citizens and U.S. citizens in obtaining marriage licenses that were procured on the basis of fraudulent misrepresentations;

d. Arranged for fake wedding ceremonies, many of which were officiated by defendant PHILIP TORRES, to make the sham marriages appear legitimate;

e. Advised the non-citizens and their fake spouses about various ways to create the appearance of a valid union and cohabitation; and

f. Helped the non-citizens to complete and submit false federal forms required to initiate and process the non-citizens' applications for legal permanent residence status.

OVERT ACTS

5. In furtherance of the conspiracy and to achieve its objective, the defendants engaged in the following actions, among others:

a. In or around September 2016, defendant ANDREA TORRES introduced Non-Citizen-1 to U.S. Spouse-1. Non-Citizen-1 thereafter obtained a marriage license in the State of New York and married U.S. Spouse-1 on September 6, 2016. Defendant PHILIP TORRES officiated the wedding, which he knew was a sham.

b. The day after the fraudulent marriage, defendant ANDREA TORRES attended the fake couple's post-wedding party, during which Non-Citizen-1

paid defendant ANDREA TORRES approximately \$8,000 for her services in arranging the fraudulent marriage.

c. In or around June 2018, defendant ANDREA TORRES assisted Non-Citizen-1 with completing a Form I-130 petition (Petition for Alien Relative), but the petition was ultimately not filed because Non-Citizen-1 began cooperating with law enforcement.

d. In or around October 2018, defendant REGINA JOHNSON assisted an undercover law enforcement officer (the "UC"), posing as a non-citizen, with obtaining a fraudulent marriage license. Specifically, defendant REGINA JOHNSON accompanied the UC and a fake spouse who was a U.S. citizen to a government office in Plainfield, New Jersey on or about October 30, 2018, where the UC applied for a marriage license.

e. On or about October 30, 2018, defendant REGINA JOHNSON accepted approximately \$600 from the UC as payment to cover the cost of a fake wedding ceremony.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I) and 1324(a)(1)(B)(i).

COUNT TWO
(Conspiracy to Harbor Certain Aliens)

6. The allegations in Paragraph 1(a) and (c) of Count One is realleged and incorporated herein as if set out in full.

7. At all times relevant to Count Two of this Superseding Indictment:

a. Non-Citizen-2 was a citizen of a foreign country seeking permanent residence in the United States.

b. Spouse-2 was a U.S. citizen ("U.S. Spouse-2").

8. From in or around March 2021 through in or around June 2021, in Essex County, in the District of New Jersey, and elsewhere, defendants,

**ANDREA TORRES and
PHILIP TORRES,**

conspired with each other and others to encourage and induce one or more aliens to come to, enter, and reside in the United States, knowing and in reckless disregard of the fact that such coming to, entry, and residence in the United States was or would have been in violation of the law, and did so for the purpose of commercial advantage and private financial gain, contrary to Title 8, United States Code, Section 1324(a)(1)(A)(iv).

OBJECT OF THE CONSPIRACY

9. It was the object of the conspiracy for defendants ANDREA TORRES and PHILIP TORRES to attain commercial advantage and private financial gain by arranging sham or fraudulent marriages between non-citizens and U.S. citizens to allow the non-citizens to obtain legal residency in the United States, knowing that the non-citizens were not otherwise permitted to legally remain in the United States.

MANNER AND MEANS OF THE CONSPIRACY

10. It was part of the conspiracy that defendants ANDREA TORRES and PHILIP TORRES:

- a. Charged the non-citizens a substantial fee for the service of arranging the sham or fraudulent marriages;
- b. Recruited and caused money to be paid to U.S. citizens in order to induce them to enter into the sham marriages that the defendants arranged for the non-citizens;
- c. Assisted the non-citizens and U.S. citizens in obtaining marriage licenses that were procured on the basis of fraudulent misrepresentations;
- d. Arranged for fake wedding ceremonies, one or more of which were officiated by defendant PHILIP TORRES, to make the sham marriages appear legitimate;
- e. Advised the non-citizens and their fake spouses about various ways to create the appearance of a valid union and cohabitation; and
- f. Helped the non-citizens to complete and submit false federal forms required to initiate and process the non-citizens' applications for legal permanent residence status.

OVERT ACTS

11. In furtherance of the conspiracy and to achieve its objective, defendants ANDREA TORRES and PHILIP TORRES and others engaged in the following actions, among others:

a. In or around March 2021, another co-conspirator introduced U.S. Spouse-2, who was in need of money, to defendant ANDREA TORRES. Defendant ANDREA TORRES told U.S. Spouse-2 that U.S. Spouse-2 could make money by entering into a sham marriage with a non-citizen.

b. On or about April 15, 2021, U.S. Spouse-2 married Non-Citizen-2. According to U.S. Spouse-2, the wedding ceremony took place at Non-Citizen-2's residence in Newark, New Jersey. U.S. Spouse-2 further stated that defendant ANDREA TORRES and defendant PHILIP TORRES, whom U.S. Spouse-2 knew as defendant ANDREA TORRES's son, transported U.S. Spouse-2 from her home to the ceremony, which they also attended.

c. In total, defendant ANDREA TORRES paid U.S. Spouse-2 between approximately \$2,000 and \$3,000 in multiple payments. Defendants ANDREA TORRES and PHILIP TORRES met U.S. Spouse-2 at a location in Neptune, New Jersey on various occasions to give U.S. Spouse-2 cash payments.

d. In or around June 2021, the United States Customs and Immigration Services received a Form I-130 (Petition for Alien Relative) on behalf of Non-Citizen-2. A sample signature provided by U.S. Spouse-2 provided to law enforcement did not match the signature purported to be the signature of U.S. Spouse-2 on Form I-130.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I) and 1324(a)(1)(B)(i).



Philip R. Sellinger

PHILIP R. SELLINGER
United States Attorney

CASE NUMBER: 21-925

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

**ANDREA TORRES,
REGINA JOHNSON, and
PHILIP TORRES**

**SUPERSEDING INDICTMENT
FOR**

8 U.S.C. § 1324(a)(1)(A)(v)(I)

A True Bill.

Foreperson

PHILIP R. SELLINGER
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FOR THE DISTRICT OF NEW JERSEY

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