

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Criminal No. 15 -
v.	:	
	:	
	:	18 U.S.C. § 2
RALPH E. MATA,	:	18 U.S.C. § 1957
	:	21 U.S.C. § 846
a/k/a "Ralph E. Mata, Jr.,"	:	
	:	<u>INFORMATION</u>
a/k/a "The Milk Man"	:	

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

**COUNT 1**

**(AIDING AND ABETTING A NARCOTICS CONSPIRACY)**

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 five 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**

**(NARCOTICS CONSPIRACY)**

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 five 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) and (b)(1)(A).

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

**COUNT 3**

**(MONEY LAUNDERING)**

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.

**FORFEITURE ALLEGATION AS TO COUNTS ONE AND TWO**

3. The allegations set forth in Counts One and Two of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853.

4. Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Section 846, the defendant,

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

shall forfeit to the United States of America any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation, and any property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Counts One and Two of this Information. The property to be forfeited includes, but is not limited to, one Rolex Submariner Stainless Steel Men's Watch.

**FORFEITURE ALLEGATION AS TO COUNT THREE**

7. The allegations contained in Count Three of this Information are hereby realleged and incorporated by reference for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 982(a)(1).

8. As the result of committing the money laundering offense in violation of 18 U.S.C. § 1957 alleged in Count Three of this Information, the defendant,

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

shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), all property, real and personal, involved in the money laundering conspiracy offense, and all property traceable to such property.

**Substitute Assets Provision**

9. If any of the property described in the forfeiture allegations as to Counts One, Two, and Three, above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled, pursuant to 21 U.S.C. § 853(p), to forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.



PAUL J. FISHMAN  
United States Attorney

CASE NUMBER: \_\_\_\_\_

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

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**UNITED STATES OF AMERICA**

v.

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

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**INFORMATION**

18 U.S.C. §§ 2, 1957  
21 U.S.C. § 846

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**PAUL J. FISHMAN**  
*UNITED STATES ATTORNEY, NEWARK, NEW JERSEY*

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JOSE R. ALMONTE**  
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