

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

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Criminal No. 19-
	:	
EUDY RAMOS	:	18 U.S.C. §§ 241, 242, 1519, & 2

**INDICTMENT**

**Count 1  
(Conspiracy to Deprive Persons of Civil Rights)**

1. At all times relevant to Count 1 of this Indictment:
  - a. Defendant EUDY RAMOS (“RAMOS”) was a police officer employed by the Paterson Police Department (“PPD”) in Paterson, New Jersey.
  - b. Jonathan Bustios (“Bustios”), Matthew Torres (“Torres”), PPD Officer 1, and PPD Officer 2 also were police officers employed by the PPD.
  - c. RAMOS, Bustios, Torres, PPD Officer 1, and PPD Officer 2 were assigned to the same squad within the PPD and typically worked a shift that began at approximately 4:30 a.m. and ended at approximately 3:45 p.m. On a typical shift, each PPD officer was assigned to patrol a specific area of Paterson. Following each shift, PPD officers were required to report their activities and assignments accurately on a Patrol Activity Log, which they signed and submitted to the PPD.

2. From in or about 2016 through in or about April 2018, in Passaic County, in the District of New Jersey, and elsewhere, defendant

**EUDY RAMOS**

knowingly and willfully conspired and agreed with Jonathan Bustios, Matthew Torres, PPD Officer 1, PPD Officer 2, and others, to injure, oppress, threaten, and intimidate individuals in Paterson in the free exercise and enjoyment of the rights secured to them by the Constitution and laws of the United States, namely: (a) their right to be free from unreasonable searches and seizures by one acting under color of law; and (b) their right not to be deprived of property without due process of law by one acting under color of law.

**Goal of the Conspiracy**

3. It was the goal of the conspiracy for RAMOS, Bustios, Torres, PPD Officer 1, PPD Officer 2, and others (the “Co-Conspirators”), acting under color of law, to: (a) illegally stop and search vehicles and the occupants of those vehicles; (b) illegally stop and search individuals in buildings or on the streets of Paterson; (c) steal money from the individuals who the co-conspirators stopped and searched illegally; and (d) conceal these activities from the PPD by submitting false reports, including false Patrol Activity Logs, that omitted, or lied about, their illegal activities.

### **Manner and Means**

4. It was part of the conspiracy that:
  - a. While in uniform and on official duty as PPD officers, the Co-Conspirators illegally targeted and stopped certain occupants of vehicles who the Co-Conspirators believed carried sums of money.
  - b. The Co-Conspirators conducted vehicle stops of those individuals without any legal basis.
  - c. The Co-Conspirators searched the motor vehicles, the drivers, and the passengers, without any legal basis.
  - d. The Co-Conspirators seized cash from the vehicles' occupants and split the cash proceeds among themselves.
  - e. The Co-Conspirators illegally stopped and searched individuals in buildings and on the streets of Paterson, seized cash from those individuals, and split the cash proceeds among themselves.
  - f. The Co-Conspirators communicated via text message regarding their criminal conduct.
    - i. In some instances, they used the code word "mango" in their text messages to refer to cash. For example, on or about February 24, 2018, RAMOS sent Bustios and Torres a text message that stated, "Who's in the mood for weekend mangoes[?]," asking whether his Co-Conspirators were interested in stealing cash from individuals in Paterson that weekend.

ii. Other times, the Co-Conspirators' texts referred to plans to illegally steal cash from the occupants of vehicles in Paterson. For example, on or about February 25, 2018, RAMOS sent Bustios a text message stating: "Wanna look for a car?" and then, later in the day, wrote: "Tryna get someone in a car."

iii. On still other occasions, the Co-Conspirators texted to identify buildings in which to conduct illegal searches and seizures. For example, on or about December 7, 2017, Bustios sent a text message to RAMOS, "83 auburn back door is open," and RAMOS responded, "On my way." 83 Auburn was one of several locations that the Co-Conspirators targeted for illegal cash seizures.

g. The Co-Conspirators submitted false police reports to the PPD, including false Patrol Activity Logs, incident reports, and offense reports, that either omitted the illegal stops, searches, and cash seizures, or affirmatively lied about them.

h. The Co-Conspirators conducted these illegal activities outside of the areas of Paterson that they had been assigned to monitor.

i. The Co-Conspirators deprived individuals of their civil rights, frequently beginning their shifts by illegally targeting individuals in certain buildings in Paterson and continuing their shifts by illegally targeting, stopping, and searching motor vehicles, and the individuals within, as set forth in the following examples:

**A. February 1, 2017**

i. On or about February 1, 2017, in Paterson, RAMOS and PPD Officer 2, while on duty and in uniform, stopped and searched a vehicle, detained and handcuffed the occupants of the vehicle, and recovered approximately \$10,000 from one of the passengers of the vehicle (“Victim 1”). PPD Officer 2 told RAMOS that either they should take all of the money or take none of it. They took all of it.

ii. RAMOS and PPD Officer 2 split the \$10,000 between themselves.

iii. RAMOS and PPD Officer 2 arrested the occupants of the vehicle, including Victim 1. In the incident report, RAMOS and PPD Officer 2 did not report to the PPD that they had located, and seized, \$10,000 from Victim 1.

iv. PPD Officer 2 filled out a Prisoner Property Report for Victim 1. PPD Officer 2 stated that Victim 1 had \$36 on Victim 1’s person upon arrival at the cellblock. PPD Officer 2 omitted the fact that RAMOS and PPD Officer 2 had stolen approximately \$10,000 from Victim 1.

v. On or about November 17, 2017, RAMOS texted Bustios, PPD Officer 1, and Torres: “Remember that arrest [PPD Officer 2] and I had where allegedly 10k went missing[?]” Bustios responded, “LMAO,” and “YEA.”

**B. December 1, 2017**

i. On or about December 1, 2017, RAMOS and Bustios stopped and searched an individual on a street corner in Paterson and stole approximately \$1,000 from the individual (“Victim 2”).

ii. After they stole money from Victim 2, an individual posted a video to Twitter of Victim 2 and Bustios standing on the street together.

iii. Bustios then left the scene and met RAMOS one block away, at which point they split the money they stole from Victim 2.

**C. December 7, 2017**

i. On or about December 7, 2017, in Paterson, RAMOS and Torres, while on duty and in uniform, stopped and searched a vehicle, detained the driver and passenger of the vehicle, and stole at least \$800 from the passenger of the vehicle (“Victim 3”).

ii. RAMOS and Torres falsely advised Victim 3 that there was a warrant for Victim 3’s arrest, when, in fact, there was not.

iii. RAMOS and Torres were told by Victim 3 that Victim 3 had a small quantity of marijuana on him. Victim 3 also had approximately \$3,100 in cash.

iv. RAMOS and Torres told Victim 3 that they could charge Victim 3 with marijuana distribution, or, instead, RAMOS and Torres could confiscate \$500 and Victim 3 could sign a piece of paper.

v. RAMOS purportedly telephoned a superior officer and then told Victim 3 that, in fact, it would cost Victim 3 \$800, instead of \$500. RAMOS handed Victim 3 a piece of paper to sign. RAMOS and Torres took at least \$800 from Victim 3, released Victim 3, and then split the stolen money between themselves.

vi. RAMOS and Torres signed and submitted Patrol Activity Logs to the PPD for their December 7, 2017 shift. They concealed their theft of monies from Victim 3 by omitting any mention of the incident on their Patrol Activity Logs.

**D. February 20, 2018**

i. On or about February 20, 2018, in Paterson, RAMOS and Bustios, while on duty and in uniform, stopped and searched a vehicle on Bergen Street in Paterson, detained the driver (“Victim 4”) and passenger of the vehicle, and stole a bag containing approximately \$1,800 in cash from Victim 4.

ii. RAMOS and Bustios told Victim 4 and the passenger that they would be released if they told RAMOS and Bustios about the location of a firearm. Victim 4 placed a phone call and directed another individual to place a firearm in a place designated by RAMOS and Bustios. RAMOS stayed with Victim 4 and the passenger. Bustios departed the scene, retrieved the firearm, called RAMOS, and told RAMOS to release Victim 4 and the passenger.

iii. RAMOS then sent Bustios text messages that stated: “Northside. Dont cut me short bitch[.]” Bustios responded, “I gotchu.” Approximately 10 minutes later, RAMOS asked Bustios, again via text message: “Where u wanna meet,” and Bustios responded, “Somewhere with no cam” and then “Peach and plum,” to which Ramos responded, “K.”

iv. RAMOS then met Bustios at Peach and Plum Streets in Paterson, and RAMOS received from Bustios approximately half of the \$1,800 they had stolen from Victim 4.

v. RAMOS and Bustios signed and submitted Patrol Activity Logs for their February 20, 2018 shift. On the Patrol Activity Logs, RAMOS and Bustios each logged an incident on Bergen Street, but omitted any mention of stopping a motor vehicle, detaining the occupants, and stealing approximately \$1,800.

vi. RAMOS submitted the recovered firearm to the PPD. In the accompanying offense report, RAMOS concealed his theft of money from Victim 4 by falsely stating that the firearm had been recovered while conducting a property check based on a tip from a concerned citizen.

**E. March 5, 2018**

i. On or about March 5, 2018, RAMOS and Torres stopped and searched a vehicle in Paterson without legal basis.

ii. The occupants of the vehicle filmed the encounter and posted the video to Instagram. During the encounter, and as depicted in the



video, one of the occupants of the vehicle asked RAMOS his basis for conducting the vehicle stop, and RAMOS replied, "random stop."

iii. RAMOS did not locate any cash inside the vehicle and thus departed the scene without taking anything.

In violation of Title 18, United States Code, Section 241.

**Counts 2 to 6**  
**(Deprivation of Rights Under Color of Law)**

1. The allegations set forth in paragraphs 1 and 4 of Count 1 of this Indictment are realleged and incorporated as if set forth herein.

2. On or about the dates set forth below, in Passaic County, in the District of New Jersey, and elsewhere, defendant

**EUDY RAMOS,**

while acting under color of law, and acting with others, willfully deprived victims of the rights secured and protected by the Constitution and laws of the United States, namely their right to be free from unreasonable searches and seizures by one acting under color of law.

<b>COUNT</b>	<b>APPROXIMATE DATE</b>	<b>CONDUCT</b>
2	February 1, 2017	Illegally stopped a vehicle in Paterson and stole approximately \$10,000 from Victim 1
3	December 1, 2017	Illegally searched Victim 2 in Paterson and stole approximately \$1,000 from Victim 2
4	December 7, 2017	Illegally stopped a vehicle in Paterson and stole at least \$800 from Victim 3
5	February 20, 2018	Illegally stopped a vehicle in Paterson and stole approximately \$1,800 from Victim 4
6	March 5, 2018	Illegally stopped a vehicle in Paterson

In violation of Title 18, United States Code, Section 242 and Section 2.

**Counts 7 to 9**  
**(Falsification of Record)**

1. The allegations set forth in paragraphs 1 and 4 of Count 1 of this Indictment are realleged and incorporated as if set forth herein.

2. Conspiracy and substantive offenses involving the deprivation of civil rights, to include the right to be free from unreasonable searches and seizures, and the right not to be deprived of property without due process of law, by a person acting under color of law, 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.

3. On or about the dates set forth below, in Passaic County, in the District of New Jersey, and elsewhere, defendant

**EUDY RAMOS**

knowingly concealed, covered up, falsified, and made false entries in Paterson Police Department reports with the intent to impede, obstruct and influence the investigation and proper administration of matters within the jurisdiction of the United States Department of Justice and the FBI, and in relation to and contemplation of such matters, as set forth below:

<b>COUNT</b>	<b>APPROXIMATE DATE</b>	<b>CONDUCT</b>
7	February 1, 2017	RAMOS submitted and caused to be submitted an incident report and prisoner property report omitting the seizure and theft of \$10,000 from

		Victim 1
8	December 7, 2017	RAMOS submitted and caused to be submitted a Patrol Activity Log omitting the encounter with Victim 3
9	February 20, 2018	RAMOS submitted and caused to be submitted an offense report falsely stating that he and Bustios had recovered two firearms during a property check based on a tip from a concerned citizen and omitting that he and Bustios had seized and stolen money from Victim 4

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

  
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CRAIG CARPENITO  
United States Attorney