

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

: Hon. Steven C. Mannion

v.

: Mag. No. 19-6065 (SCM)

DANIEL PENT

: **CRIMINAL COMPLAINT**

I, Kelly Blanchfield, 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 ("FBI"), and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.



Kelly Blanchfield
Special Agent
Federal Bureau of Investigation

Sworn to before me, and subscribed in my presence
on the 25th day of March, 2019
at Newark, New Jersey



Signature of Judicial Officer

HONORABLE STEVEN C. MANNION
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

On or about February 1, 2017, in Passaic County, in the District of New Jersey, and elsewhere, defendant

DANIEL PENT

did knowingly and willfully conspire and agree with others, including Eudy Ramos, to injure, oppress, threaten, and intimidate Victim 1 and others 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.

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

ATTACHMENT B

I, Kelly Blanchfield, am a Special Agent with the Federal Bureau of Investigation. I am aware of the facts contained herein based upon interviews and briefings with other law enforcement officers and interviews of witnesses. I also have reviewed or been briefed regarding other evidence, including Internal Affairs complaints and text message communications. Because this complaint is being submitted for the limited purpose of establishing probable cause, I have not set forth herein each and every fact that I know or that has been told to me concerning this investigation. Unless specifically indicated, any statements herein attributed to individuals are set forth in substance and in part.

1. At times relevant to this Complaint:

- a. Defendant DANIEL PENT ("PENT") was a police officer employed by the Paterson Police Department ("PPD") in Paterson, New Jersey.
- b. Eudy Ramos was a police officer employed by the PPD. Ramos has been charged in a separate indictment with, among other things, conspiracy to deprive persons of civil rights, Crim. No. 19-198 (KSH).
- c. CW-1 and CW-2 were police officers employed by the PPD. CW-1 and CW-2 have interviewed with, and provided information to, law enforcement, in the hopes of obtaining a more favorable outcome with respect to pending federal charges.

2. According to CW-1, PENT and other PPD officers, including Ramos and CW-1: (a) stopped and searched vehicles and the drivers and passengers of those vehicles, without legal basis; and (b) stole money from the drivers and passengers of those vehicles.

3. According to CW-1, PENT and other PPD officers, including Ramos and CW-1, also illegally stopped and search individuals in buildings and on the streets of Paterson and stole money from those individuals.

4. For example, on or about February 1, 2017, in Paterson, PENT and Ramos, while on duty, stopped and searched a vehicle, detained and handcuffed the occupants of the vehicle, and recovered approximately \$10,000 from one of the occupants of the vehicle ("Victim 1"). According to Victim 1, PENT and Ramos stopped the vehicle and ordered the occupants out of the vehicle. Victim 1 was in the front passenger seat, and there also was an additional passenger in the backseat. Victim 1 was carrying approximately

\$10,000 in cash in a plastic bag.

5. According to Victim 1, PENT and Ramos told Victim 1 that they were not going to charge Victim 1 with a crime. However, according to Victim 1, PENT and Ramos told Victim 1 that they were going to take Victim 1's \$10,000 and that if Victim 1 tried to claim the \$10,000, then Victim 1 would be criminally charged with attempting to purchase heroin. Victim 1 then witnessed PENT and Ramos whispering to each other, and Victim 1 saw Ramos put the \$10,000 into his jacket pocket.

6. According to Victim 1, other PPD officers arrived on scene, including one officer who appeared to be a supervising officer. This officer spoke to PENT and Ramos, and then Ramos handcuffed Victim 1. Victim 1 was taken to PPD headquarters and charged with loitering in a drug area. Victim 1 was released that same day. Before leaving PPD headquarters, Victim 1 asked the police officer at the property window about the \$10,000, and the police officer told Victim 1 that no one had turned anything in. Victim 1 filed a report with the PPD Internal Affairs Department. According to Victim 1, PENT and Ramos did not act like police officers; instead, they treated the situation like a robbery.

7. PENT filled out, signed, and submitted to the PPD a Prisoner Property Report for Victim 1. PENT wrote on the Prisoner Property Report that Victim 1 had approximately \$36 upon arrival at cellblock. PENT did not report that he and Ramos had taken \$10,000 from Victim 1.

8. PENT and Ramos submitted a PPD incident report pertaining to the arrest of Victim 1. In the incident report, PENT and Ramos did not report that they had located, and seized, \$10,000 from Victim 1.

9. According to CW-1, after the encounter with Victim 1, Ramos told CW-1 that he and PENT had taken the \$10,000 from Victim 1. Ramos told CW-1 that, during the encounter with Victim 1, PENT told Ramos that either they should take all of the money or they should take none of it. PENT and Ramos agreed to take all of it.

10. According to CW-2, after the encounter with Victim 1, Ramos told CW-2 that he and PENT had taken \$10,000 from Victim 1. Ramos told CW-2 that PENT had told him to "tag it all or take it all."