

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

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Criminal No. 19-
	:	
DANIEL PENT	:	18 U.S.C. § 241
	:	18 U.S.C. § 242
	:	18 U.S.C. § 1519

**INFORMATION**

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

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

1. At all times relevant to Count 1 of this Information:
  - a. Defendant DANIEL PENT (“PENT”) was a police officer employed by the Paterson Police Department (“PPD”) in Paterson, New Jersey.
  - b. Eudy Ramos (“Ramos”), Jonathan Bustios (“Bustios”), Matthew Torres (“Torres”), and Frank Toledo (“Toledo”) were police officers employed by the PPD.
  - c. PENT, Ramos, Bustios, Torres, and Toledo 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 to in or about April 2017, in Passaic County, in the District of New Jersey, and elsewhere, defendant

**DANIEL PENT**

knowingly and willfully conspired and agreed with Eudy Ramos, Jonathan Bustios, Matthew Torres, Frank Toledo, 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 PENT, Ramos, Bustios, Torres, Toledo, 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) arrest individuals in Paterson; (d) steal money from the individuals who the Co-Conspirators stopped and searched illegally and from the individuals they arrested; and (e) conceal these activities from the PPD by submitting false reports 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 in Paterson 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 and the occupants, 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 arrested individuals, seized cash from those individuals during the arrests, and split the cash proceeds among themselves.
  - g. The Co-Conspirators communicated via text message regarding their criminal conduct, and they used the code word "mango" in their text messages to refer to cash.

h. 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.

i. The Co-Conspirators conducted these illegal activities outside of the areas of Paterson that they had been assigned to patrol. For example, on or about February 1, 2017, PENT and Ramos, while on duty, in Paterson, 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. PENT told Ramos that either they should take all of the money or none of it. PENT and Ramos seized the \$10,000 from the passenger and split the proceeds between themselves.

j. The Co-Conspirators filled out Currency Seizure Reports that falsely under-reported the amount of money they had seized from individuals in Paterson. For instance, on or about May 27, 2016, PENT and Ramos arrested an individual, stole several hundred dollars in cash from the individual, and then filled out a false Seizure Report claiming that the individual only had approximately \$477. PENT and Ramos applied a forged signature of the individual to the Seizure Report to make it falsely appear as though the individual had seen and agreed to the amount on the Report.

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

**Count 2**  
**(Deprivation of Rights Under Color of Law)**

1. The allegations set forth in paragraph 1 of Count 1 of this Information are realleged and incorporated as if set forth herein.

2. PENT and other PPD officers routinely used unreasonable and excessive force in their encounters with individuals, while on official duty—for example:

a. PENT and other PPD officers regularly delivered a “running tax” to individuals they arrested. If an individual ran from them, PENT and others would “tax” the individual by striking the individual multiple times, causing bodily injury.

b. On or about January 20, 2015, PENT and Ramos received a call regarding loud music coming from a vehicle on Doremus Avenue in Paterson. PENT and Ramos approached the individual in a vehicle on Doremus Avenue in Paterson. PENT and Ramos removed the individual from the vehicle and began punching and kicking him. The individual suffered bodily injury, including eye injuries, as a result of PENT’s and Ramos’s excessive force.

3. From in or about 2015 to in or about April 2017, in Passaic County, in the District of New Jersey, and elsewhere, defendant

**DANIEL PENT,**

while acting under color of law, punched, violently struck, and caused physical

harm to individuals, willfully depriving the individuals of the right, secured and protected by the Constitution and laws of the United States, to be free from the use of unreasonable force by a law enforcement officer, resulting in bodily injury to the individuals.

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

**Count 3**  
**(Falsification of a Record)**

1. The allegations set forth in paragraphs 1 and 4 of Count 1 of this Information 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 February 1, 2017, in Passaic County, in the District of New Jersey, and elsewhere, defendant

**DANIEL PENT,**

in relation to and in contemplation of a matter within the jurisdiction of the FBI, an agency of the United States, knowingly concealed, covered up, falsified, and made a false entry in a Paterson Police Department Incident Report with the intent to impede, obstruct and influence the investigation and proper administration of such matter, that is, PENT submitted and caused to be submitted an Incident Report that entirely omitted that he and Ramos had stolen approximately \$10,000 from the passenger of a vehicle.

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

*Craig Carpenito*  
CRAIG CARPENITO  
United States Attorney

CASE NUMBER: 19-

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

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**UNITED STATES OF AMERICA**

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**DANIEL PENT**

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**INFORMATION FOR**

18 U.S.C. § 241  
18 U.S.C. § 242  
18 U.S.C. § 1519

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**CRAIG CARPENITO**

*U.S. ATTORNEY  
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