

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

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UNITED STATES OF AMERICA : INFORMATION  
 :  
 v. :  
 :  
 ARMANDO J. PEREZ : 3:20cr\_\_\_\_\_

**COUNT ONE**  
**(Conspiracy to Commit Wire Fraud)**

The United States Attorney charges:

1. From at least in or about March 2018, up to and including at least in or about December 2018, in the District of Connecticut and elsewhere, ARMANDO J. PEREZ, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other, and with others known and unknown, to commit offenses against the United States, to wit, wire fraud, in violation of Title 18, United States Code, Section 1343.

2. It was a part and object of the conspiracy that ARMANDO J. PEREZ, the defendant, and others known and unknown, knowingly and with the intent to defraud, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce writings, signs,

signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343, to wit, then-Acting Bridgeport Police Department ("BPD") Chief PEREZ and others known and unknown agreed to (i) embezzle confidential information from the City of Bridgeport ("the City") relating to the open and competitive examination required by the City's Charter to select the new permanent police chief, (ii) deceive the City into ranking PEREZ as one of the top three candidates, and ultimately awarding the permanent police chief position and resulting contract to PEREZ under false and fraudulent pretenses, and (iii) deprive the City of its right to control the use of its assets, by depriving the City of financially valuable information relevant to its decision on how to allocate the permanent police chief position and the resulting employment contract.

#### Overt Acts

3. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed and caused to be committed in the District of Connecticut and elsewhere:

a. On or about June 11, 2018, ARMANDO J. PEREZ, the defendant, submitted via interstate email a résumé and cover letter to apply for the permanent police chief position, which were

substantially prepared for PEREZ by two BPD officers working under his control ("Officer-1" and "Officer-2," respectively).

b. In or around June 2018, PEREZ directed Officer-1 and Officer-2 to assist in preparing PEREZ's written responses for both a questionnaire and two essay questions required of all candidates for the police chief position ("the Written Exam" portion of the examination), using a confidential scoring guide PEREZ obtained from a co-conspirator ("CC-1") and notwithstanding the specific instruction that PEREZ was to complete the Written Exam "yourself."

c. On or about June 25, 2018, PEREZ submitted via interstate email his completed Written Exam, including the written questionnaire and essays substantially prepared by Officer-1 and Officer-2, representing the work to be his own.

d. On or about July 20, 2018, having been invited to participate in a telephonic oral exam (the "Oral Exam") and having been provided by CC-1 with draft questions for the Oral Exam via email, PEREZ directed Officer-1 to access PEREZ's City email account and print the draft Oral Exam questions.

e. In or around July 2018, PEREZ having qualified to proceed to the telephonic exam component of the examination (the "Oral Exam") instructed Officer-1 to draft answers that PEREZ could use in his Oral Exam based on confidential information, namely the expected Oral Exam questions, PEREZ had received from CC-1.

f. On or about July 30, 2018, and after having placed Officer-1 on administrative leave for an unrelated matter, PEREZ visited Officer-1 at home and requested Officer-1 "sneak in" to the BPD headquarters to retrieve the draft answers to the draft Oral Exam questions that Officer-1 had prepared for PEREZ.

g. On or about August 9, 2018, PEREZ participated in the Oral Exam via interstate telephone call and with the benefit of having the confidential examination questions PEREZ had previously been provided by CC-1.

h. On or about October 15, 2018, shortly in advance of the last stage of the examination process, an October 19, 2018 panel interview conducted by five independent panelists, CC-1 sent a text message to PEREZ reading "Call me regarding sgt exam," and PEREZ then used his cellphone to call CC-1.

(Title 18, United States Code, Section 371.)

**COUNT TWO**

**(False Statements)**

The United States Attorney further charges:

4. On or about May 1, 2020, ARMANDO J. PEREZ, the defendant, willfully and knowingly did make materially false, fictitious, and fraudulent statements and representations in a matter being investigated by law enforcement based in the District of Connecticut and within the jurisdiction of the executive branch of the Government of the United States, to wit, PEREZ falsely

stated to special agents of the Federal Bureau of Investigation ("FBI") that (i) he had told Officer-1 not to sneak into BPD headquarters to retrieve confidential materials that were important in the police chief selection process, and (ii) he had only seen Officer-1 twice since Officer-1's departure from service, omitting the meeting at which PEREZ first requested that Officer-1 sneak into BPD headquarters.

(Title 18, United States Code, Section 1001(a)(2).)

  
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AUDREY STRAUSS  
ACTING UNITED STATES ATTORNEY  
SOUTHERN DISTRICT OF NEW YORK  
Acting Under Authority Conferred  
by 28 U.S.C. § 515