

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

UNITED STATES OF AMERICA : Hon. Steven C. Mannion  
 :  
 v. : Mag. No. 18-6258 (SCM)  
 :  
 MATTHEW TORRES : **CRIMINAL COMPLAINT**

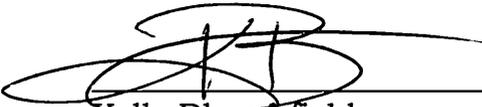
I, Kelly Blanchfield, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

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 18<sup>th</sup> day of December, 2018  
at Newark, New Jersey

HONORABLE STEVEN C. MANNION  
UNITED STATES MAGISTRATE JUDGE

  
\_\_\_\_\_  
Signature of Judicial Officer

## **ATTACHMENT A**

On or about December 7, 2017, in Passaic County, in the District of New Jersey, and elsewhere, defendant

**MATTHEW TORRES**

did knowingly and willfully conspire and agree with others 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, their right to be secure in their vehicles and their persons against unreasonable searches and seizures.

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. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. At times relevant to this complaint:
  - a. Defendant MATTHEW TORRES ("TORRES") 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 criminal complaint.
  - c. CW-1 was a police officer employed by the PPD. CW-1 has cooperated with law enforcement in the hopes of obtaining a more favorable outcome with respect to pending federal charges.
  
2. According CW-1, TORRES 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. For example, on or about December 7, 2017, TORRES and Ramos conducted a vehicle stop of Victim 1 in Paterson. According to Victim 1, Victim 1 was a passenger in the passenger seat of a vehicle driven by Victim 1's brother. TORRES and Ramos, assigned to two different police cars that day, conducted the vehicle stop and removed Victim 1 and his brother from the vehicle. TORRES and Ramos then searched the vehicle, Victim 1, and Victim 1's brother. Victim 1 advised Ramos and Torres that Victim 1 had two bags of marijuana in his pocket. Ramos told Victim 1 that "honesty goes a long way." Victim 1 also had \$3,100 in his pocket. Ramos took the \$3,100 and placed it on the backseat of the vehicle. Ramos then told Victim 1 that Ramos "doesn't worry about the weed." Ramos also told Victim 1 that Victim 1 had a potential outstanding warrant. TORRES and Ramos placed Victim 1 in one of the police cars and Victim 1's brother in the other. They told Victim 1 that Victim 1 could

be charged with distribution of marijuana and that they could not let Victim 1 go "because the camera saw it," likely referring to a City of Paterson camera located in the area.

4. According to Victim 1, Ramos then told Victim 1 that, instead of arresting Victim 1, they could take \$500, have Victim 1 sign a piece of paper, and give the paper to the narcotics division. Ramos told Victim 1 that they would confiscate \$500 and that Ramos had to call a superior officer to verify that \$500 was acceptable. Ramos asked Victim 1 for Victim 1's date of birth and social security number, placed a call, and then hung up the telephone and told Victim 1 that his superior had said "they could do it, but it'll be \$800." Ramos then took a piece of white paper that had a PPD logo on it, turned it over, wrote something on it, and told Victim 1 to sign it. Victim 1 signed it. Victim 1 does not know what was written on the paper.

5. TORRES and Ramos then released Victim 1 and Victim 1's brother without filing any charges. According to Victim 1, there was \$1,000 missing from his original \$3,100. TORRES and Ramos did not report the cash seizure to the PPD.

6. According to PPD records, there were no outstanding warrants for Victim 1.

7. According to CW-1, Ramos frequently used fake paperwork, of the sort he used with Victim 1, to trick individuals into believing that the incident was a legitimate law enforcement encounter.

8. In or about December 2018, TORRES was interviewed by the FBI. TORRES admitted that he and Ramos illegally seized cash from Victim 1 and that they shared the cash proceeds afterwards. TORRES also admitted that he and Ramos had engaged in similar criminal conduct on other occasions.