

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA :
 :
 v. : Criminal No. 10 -
 :
 DAN E. MORRIS : 18 U.S.C. § 241
 :

INFORMATION

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

1. At all times relevant to this Information, the Camden Police Department (hereinafter, the "Camden PD") was a law enforcement agency charged with protecting and serving the residents of Camden, New Jersey, as well as any individual who may visit Camden.
2. Defendant Dan E. Morris ("defendant Morris") was employed by the Camden PD as a Police Officer since approximately 1986 and was issued Badge Number 600. Morris held the rank of Sergeant and at various times between May 2007 and September 17, 2008 supervised co-conspirators Kevin Parry and Jason Stetser and two other officers, officers #2 and #4. On or about September 17, 2008, defendant Morris was injured on duty and ceased all active duty as a police officer. Defendant Morris retired as of January 1, 2010 on a claimed disability.

CONSPIRACY TO DEPRIVE OTHERS OF CIVIL RIGHTS

3. From in or about May 2007 to on or about September 17, 2008, at Camden, in the District of New Jersey, and elsewhere, defendant

DAN E. MORRIS,

while acting under color of the laws of the State of New Jersey, did knowingly and willfully conspire and agree with others, including co-conspirators Kevin Parry and Jason Stetser and

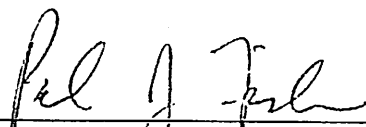
officers #2 and #4, to injure, oppress, threaten, and intimidate persons in the State of New Jersey, in the free exercise and enjoyment of rights and privileges secured by the Constitution and laws of the United States, namely the right not to be deprived of liberty and property without due process of law, to include the right to be free from unreasonable searches and seizures and to be free from the intentional use of unreasonable force by one acting under color of law.

Object of the Conspiracy

4. It was the object of the conspiracy for defendant Dan E. Morris and his co-conspirators, including Kevin Parry, Jason Stetser and officers #2 and #4, to deprive individuals of their due process rights, by the following methods and means:

- a. Conducting illegal searches of residences and personal property without warrants or valid consents;
- b. Obtaining coerced consents to search residences based on threats and undue pressure;
- c. Stealing money from individuals, including during the commission of unlawful searches, with the intent to use the stolen money for personal purposes;
- d. Intentionally using unreasonable force to conduct one or more of the other methods or means of the conspiracy; and
- e. Falsifying police reports, testifying falsely under oath and intentionally failing to testify, all to conceal their unlawful actions.

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



PAUL J. FISHMAN
United States Attorney

CASE NUMBER: _____

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INFORMATION FOR

Title 18 United States Code
Section 241

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