

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

UNITED STATES OF AMERICA : Hon.
 :
 v. : Crim. No. 24-
 :
 LORENZO BOWDEN : 18 U.S.C. § 1512(k)

I N F O R M A T I O N

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

(Conspiracy to Obstruct Justice)

1. At all times relevant to this Information, unless otherwise stated:
 - a. Defendant LORENZO BOWDEN was a Correctional Officer employed at the Passaic County Jail (“PCJ”) in Paterson, New Jersey.
 - b. Jose Gonzalez and Donald Vinales, each a co-conspirator not charged in this Information, were Sergeants employed at the PCJ.
 - c. Officer-1, Officer-2, and Officer-3 were Correctional Officers employed at the PCJ. Officer-4 was a Sergeant employed at the PCJ.
 - d. Victim-1 was a pretrial detainee housed at the PCJ.
 - e. The Passaic County Sheriff’s Office Use of Force policies and procedures pertaining to institutional operations, including at the PCJ, was effective May 10, 2010 and revised on May 11, 2018. It specified, among other things, that: (i) “[u]se of force as punishment” is “prohibited”; (ii) that if inmates are subjected to use of force, “[t]he officer(s) shall as soon as practical, transport the inmate to the Medical Department to be assessed, and treated by

medical staff”; and (iii) that “[f]ollowing the use of physical force, written reports shall be prepared and completed before the completion of the tour of duty by the custody staff members involved.” According to PCJ training records, BOWDEN, Gonzalez, and Vinales all were trained on the “Use of Force” policy during their employment at the PCJ.

f. PCJ had video surveillance cameras throughout the facility, though certain areas were not captured by the cameras. PCJ Correctional Officers and inmates referred to those non-covered areas as “blind spots.”

The Assault

2. On or about January 22, 2021, while in a pretrial detention cell, Victim-1 splashed a mixture containing urine onto Officer-1, among other officers.

3. The following day, on or about January 23, 2021, BOWDEN Gonzalez, Vinales, Officer-2, and Officer-4 escorted Victim-1 from Victim-1’s cell to the PCJ’s medical unit.

4. Video surveillance footage of the route between Victim-1’s cell and the PCJ’s medical unit revealed that BOWDEN, Gonzalez, Vinales, Officer-2, and Officer-4 escorted Victim-1, who was handcuffed, through a blind spot. Video surveillance footage further revealed that the walk through that blind spot lasted for approximately 20 seconds.

5. After Victim-1 met with medical staff in the medical unit for approximately one minute, BOWDEN, Gonzalez, Vinales, Officer-2, and Officer-4 escorted Victim-1, who was handcuffed, back to Victim-1’s cell area.

6. Video surveillance footage of the walk from the medical unit to Victim-1's cell area revealed that the group traveled through the same blind spot. This time, as revealed by video surveillance footage, the walk lasted approximately 75 seconds, approximately 55 seconds longer than the previous walk through the blind spot.

7. During that time in the blind spot, Gonzalez and Vinales assaulted Victim-1. Gonzalez knocked Victim-1 to the ground. Once down, Gonzalez and Vinales struck Victim-1, causing injury. As Gonzalez and Vinales assaulted Victim-1, BOWDEN, Officer-2, and Officer-4 watched and took no action to intervene.

8. BOWDEN understood that Gonzalez and Vinales had violated the "Use of Force" Policy by assaulting Victim-1 as punishment for Victim-1 a mixture containing urine onto Officer-1, among other officers. BOWDEN also violated the "Use of Force" Policy by failing to transport Victim-1 to the Medical Department for treatment after Victim-1 was assaulted by Gonzalez and Vinales.

9. The day after the assault, on or about January 24, 2021, Victim-1 was taken to a local hospital, which documented injuries from the assault.

10. In or around late March 2022, federal law enforcement officers served subpoenas on behalf of a federal grand jury that was investigating the assault.

The Conspiracy to Obstruct Justice

11. From in or around at least January 2021 through in or around October 2022, in the District of New Jersey and elsewhere, the defendant,

LORENZO BOWDEN,

knowingly and willfully conspired and agreed to knowingly and corruptly persuade, attempt to corruptly persuade, and engage in misleading conduct toward another person, with intent to hinder, delay, and prevent the communication to a federal law enforcement officer of information relating to the commission and possible commission of a federal offense, contrary to Title 18, United States Code, Section 1512(b)(3).

Goal of the Conspiracy

12. The goal of the conspiracy was for BOWDEN and his co-conspirators to omit material information and provide false and misleading information to federal investigators that were investigating violations of Victim-1's civil rights.

Overt Acts

13. In furtherance of the conspiracy, and to accomplish its unlawful object, members of the conspiracy committed, and caused to be committed, the following overt acts, among others, within the District of New Jersey:

a. After becoming aware of the grand jury subpoenas regarding the assault, on or about April 18, 2022, BOWDEN initiated a group text message chain (the "Group Text Chain") to Gonzalez, Vinales, and others, in which he scheduled a meeting to discuss, in substance and in part, the federal investigation.

b. On or about April 20, 2022, BOWDEN, Gonzalez, Vinales, Officer-2, Officer-3, and Officer-4 met outside of a gym in Wayne, New Jersey to discuss the federal investigation. During that meeting, some of those who were

present stated, in substance and part, that everyone should keep their mouths shut and should say that nothing had happened to Victim-1 (referring to the assault).

c. On or about October 18, 2022, BOWDEN was interviewed (the “October 18th Interview”) by federal law enforcement officers regarding the January 23, 2021 assault of Victim-1. BOWDEN was advised multiple times that lying to federal law enforcement officers was a federal crime. During that interview, BOWDEN falsely stated multiple times that he and other PCJ employees, specifically Gonzalez, Vinales, Officer-2, Officer-3, and Officer-4, did not meet with each other and did not have any group communications with each other after the grand jury subpoenas were served in late March 2022 in connection with the investigation.

In violation of Title 18, United States Code, Section 1512(k).

A handwritten signature in blue ink that reads "Philip R. Sellinger" with a stylized flourish at the end.

PHILIP R. SELLINGER
United States Attorney

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INFORMATION FOR

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