

MEG:AS/MJJ  
F.# 2017R00198

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(18 U.S.C. § 1951)

RUSLAN REIZIN and  
MARK KRIVOI,

Defendants.

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EASTERN DISTRICT OF NEW YORK, SS:

Luke B. Hardison, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

On or about and between May 22, 2017 and November 28, 2017, within the Eastern District of New York and elsewhere, the defendants RUSLAN REIZIN and MARK KRIVOI did knowingly and intentionally conspire to obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that REIZIN and KRIVOI agreed to obtain property, to wit: proceeds of a commercial business, from an individual, by extortion.

(Title 18, United States Code, Section 1951)

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"). I have been a Special Agent for approximately five years; I investigate organized crime and violent crime, among other things. These investigations are conducted both overtly and covertly. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendants' criminal history records; and from reports of other law enforcement officers involved in the investigation.

2. As set forth below, there is probable cause to believe that RUSLAN REIZIN and MARK KRIVOI have extorted a victim (the "Victim"),<sup>2</sup> and assaulted the Victim in furtherance of the extortion. During interviews with the FBI, the Victim stated that he met an individual named "Ruslan" in or around the summer of 2016.<sup>3</sup> He further stated that Ruslan owns an awning-cleaning business in Brooklyn and that, in or about 2016, the Victim began working for Ruslan on a commission basis. As discussed in more detail below, the FBI has confirmed through the Victim and through surveillance that the individual

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

<sup>2</sup> The Victim has not received any benefits, other than the extortionate money he has paid REIZIN and protection he receives during these payments.

<sup>3</sup> This and all other statements of the Victim to the FBI are set forth in substance and in part.

known to the Victim as “Ruslan” is RUSLAN REIZIN, and that REIZIN’s co-conspirator who assaulted the Victim is MARK KRIVOI.<sup>4</sup>

3. The Victim further stated that he stopped working for REIZIN in approximately the summer of 2016 and that around that same time, the Victim started his own cleaning business in New York City, including in Brooklyn, Queens, and the Bronx, which has continued to operate during REIZIN’s extortion of the Victim, albeit in a reduced capacity because of REIZIN’s threats. REIZIN appeared to have learned about the business in the spring of 2017. According to the Victim, on or about May 22, 2017, the Victim received two voicemails from REIZIN, who was using a telephone with the number 347-221-4379 assigned (the “REIZIN Phone”). Toll analysis and analysis of the Victim’s phone confirmed that the calls were placed from the REIZIN Phone to the Victim’s telephone that day. The Victim stated that he knew the voicemails were from REIZIN, in part, because he saw that the calls came from a telephone number that is saved as “Ruslan” in his phone<sup>5</sup> and in part because he recognized REIZIN’s voice.

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<sup>4</sup> Because the Victim was well acquainted with REIZIN by the time of his assault, the FBI showed the Victim a photobook in which he identified REIZIN. The Victim identified KRIVOI in a photo array as the individual who, as described below, assaulted him on or about May 22, 2017. The photo array procedure was conducted by an agent who did not know the identities of the targets of this investigation, including REIZIN and KRIVOI. Database searches revealed that a red Dodge Ram—matching the description of the automobile that the Victim stated he saw KRIVOI driving on or about May 22, 2017—is registered to KRIVOI. In addition, in or about July 2017, agents conducting physical surveillance in Brooklyn, New York observed a red Dodge Ram in the vicinity of KRIVOI’s residence.

<sup>5</sup> The FBI has confirmed, by examining the Victim’s phone, that the REIZIN Phone is saved as “Ruslan” in the Victim’s phone, and that each one of the voicemails that the Victim received came from the REIZIN Phone. Subscriber information subpoenaed for the REIZIN Phone shows that the telephone is registered to “Ruslan Reizin.”

4. Law enforcement subsequently obtained copies of these voicemail recordings.<sup>6</sup> In one voicemail, REIZIN stated the following:

Hello [reference to the Victim]. This is Ruslan. 342—sorry, 347-221-4379 [the REIZIN Phone]. Call me back. I have a big problem with you. We have a serious situation. Call me back immediately.

In the second voicemail, REIZIN stated the following:

Hello, [unintelligible]. It is best that you call me back. You already understand what this conversation is about. Better off you call me so that I don't have to set up your fucking monkey ass and then create different problems. Give me a call. We have to settle certain things, bro. 347-221-4379 [the REIZIN Phone], Ruslan.

5. Later that day, after receiving the voicemails, the Victim used his telephone to call REIZIN on the REIZIN Phone. A review of the historical tolls for the REIZIN Phone shows that it had multiple communications with the Victim's telephone on this day. I have reviewed a transcript of a recorded call between REIZIN and the Victim, during which the following exchange occurred:

REIZIN: Hello [unintelligible]

VICTIM: Yes, what's up, Ruslan?

REIZIN: Yes. I wanted to tell you that we need to meet, to chat a bit.

VICTIM: Regarding?

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<sup>6</sup> Most of REIZIN's statements quoted throughout this Affidavit were made partially in English and Russian. This and all other English translations of Russian language statements are set forth in draft form. In addition, my review of the recorded calls and meetings is based on reading the draft transcripts. Although I have also been present for and reviewed video of two meetings, I have not reviewed the audio of the meetings or the calls for content because I do not speak Russian.

REIZIN: Regarding your new job, credit card application, where you go through my accounts, open accounts [unintelligible]—

VICTIM: Wait, which ones?

REIZIN: When you leave my business you will not be doing this. This was our agreement. I explained it because I am feeding my family in the neighborhood and I have a couple of fucking crippled people like you. You cannot do what I am doing, especially in my neighborhood. We have to meet and seriously resolve the issue. Otherwise it could for real be fucking horrendous. I fucking respected you until now, until you started to steal from me in this way. If I needed to hurt you I would have done it differently. Today I just want to talk. If you don't understand it in a nice way, we will have the most serious problems. I don't want it to go that way. You are a good guy but we have to fucking sit down and talk. You fucked up, man.

VICTIM: Well, we can sit down and talk. When do you want to talk?

REIZIN: I will now finish my meeting. I don't know how many hours. Let's do it closer to five.

VICTIM: Okay.

REIZIN: I will call you. We will meet for coffee and will shoot the breeze.

VICTIM: Okay.

REIZIN: Bye.

VICTIM: Bye.

6. According to the Victim, the following occurred later that day: REIZIN called the Victim while the Victim was at a restaurant in Brooklyn and told the Victim to meet REIZIN outside the restaurant. The Victim went outside the restaurant and saw

REIZIN in a van. Another individual, later identified as MARK KRIVOI, was also present, in a red Dodge Ram (the “Dodge Ram”). REIZIN told the Victim to get inside the Dodge Ram.<sup>7</sup> REIZIN, KRIVOI and the Victim then drove in the two vehicles to a nearby location. After arriving at that location, REIZIN got out of his vehicle, grabbed the Victim and brought him to some nearby trees. KRIVOI followed them. REIZIN then brandished a knife and told the Victim that “Bratva” sent him and that the Victim had a choice of getting his ear cut or his neck cut.

7. Bratva is a Russian word that translates to “brotherhood.” A publicly accessible website that purports to be run by Bratva confirms that Bratva is an organization of motorcycle riders and states that fluency in Russian is required for membership.<sup>8</sup> During the course of this investigation, the FBI has observed riders on motorcycles in and around the Sheepshead Bay neighborhood in Brooklyn wearing vests with the word “BRATVA” printed on them. According to the Victim, REIZIN had referenced Bratva in earlier conversations to suggest that REIZIN could draw on the organization’s members to commit violent acts.

8. During the same incident, after telling the Victim that Bratva sent him, REIZIN told the Victim that he had a third option: to not work in Brooklyn anymore and to pay \$10,000 to REIZIN and to Bratva. REIZIN later “reduced” the payment to \$5,000, which REIZIN stated the Victim could pay in monthly installments to REIZIN. The Victim told REIZIN that he could not afford to pay this amount. In Russian, REIZIN then directed

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<sup>7</sup> This and all other statements of REIZIN as recalled by the Victim are set forth in part and in substance.

<sup>8</sup> Available at <http://bratvamc.com/about-the-club-english.html>.

KRIVOI—whom he had previously described as his “soldier”—to hit the Victim, which KRIVOI did multiple times. The Victim relented, telling REIZIN he would pay; KRIVOI stopped hitting the Victim. REIZIN indicated that he would harm the Victim’s family if the Victim went to the police, and that even if he is arrested, that he would make bail and come after him and his family. KRIVOI then drove the Victim away from the location in the Dodge Ram.

9. On or about June 28, 2017, during a recorded call between REIZIN and the Victim, REIZIN tried to pressure the Victim into meeting him at his preferred location: “I am on 37th and Flatlands.” In response, the Victim stated, “This time, let’s meet at some decent [unintelligible].” REIZIN persisted in pressuring the Victim to come to his preferred location:

You and I have a fucking agreement. It hurts me, it’s unpleasant for me, but an agreement is an agreement. I am just fucking training right now and I don’t feel like stopping training to run somewhere, stopping training and stopping a class to come to see you. You see, I’ll just come down and take it from you until the next month. If I told you that [unintelligible]. You don’t understand that it’s a job. [Victim], you think that if you don’t—if I have to reach you, that the only way I can do it is for you to come to me? Only that way, or what do you think, are there other ways of finding you? I don’t fucking need this, [Victim]. I made an agreement with, you, you keep your word, I keep my word. Do whatever you want with me. I am asking you seriously. [Unintelligible - recording cut out] in Brooklyn. You gave me your word that you won’t do it. You and I do not have any problems. I cannot have you, Bratva won’t allow me not to give you.

Based on my training and experience and knowledge of this investigation, I believe that in the first part of REIZIN’s response, REIZIN confirmed the terms of the agreement he had with the Victim that the Victim refrain from working in Brooklyn and pay

REIZIN money (“You and I have a fucking agreement.”). REIZIN also promised the Victim that he would not be assaulted again if the Victim follows the agreement (“nothing is going to happen to you”), and that REIZIN had other ways to reach the Victim even if the Victim did not come to meet him (“if I have to reach you, that the only way I can do it is for you to come to me?”). Later in the call, the Victim and REIZIN continued discussing the location of the meeting, finally picking the Roll-N-Roaster restaurant (“Roll-N-Roaster restaurant”), located at 2901 Emmons Avenue, in Brooklyn, New York.

10. After this call, the Victim met with REIZIN in Brooklyn to pay the \$200 monthly payment (supplied by the FBI), while the agents conducted surveillance.<sup>9</sup>

11. During the recorded meeting between REIZIN and the Victim, REIZIN reiterated his demand that the Victim not work in Brooklyn, stating, for example, “You are taking my bread away from me and my family. This is a problem. Do you understand what I mean?” Later during the conversation, REIZIN told the Victim that his stepfather will not be able to assist him: “You think this little half-faggot married your mother—he’s not going to help you, at all. Got it? When his ear is fucking cut out and he will be forced to chew it and swallow it, and they will dump his fucking shitty car in the garbage—he will be singing a very different tune.”

12. REIZIN also stated that the \$200 payment was “obshchak”—a Russian word that roughly translates to “tribute”—to Bratva. REIZIN has identified himself as a

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<sup>9</sup> Prior to and after each recorded meeting described above, law enforcement personnel searched the Victim to confirm that he had no contraband, and that he returned without the \$200 supplied by the FBI. As described in this Affidavit, the Victim’s reliability has been established, in part, through recordings and cell-site evidence.



member of Bratva, stating, for example, that his house in New Jersey is co-owned by another member of Bratva, and, on at least one occasion, wearing a Bratva t-shirt when collecting a payment from the Victim. In addition, in 2015 and 2016 (as recently as August 2016), NYPD license plate readers show a male driving motorcycles with a Bratva jacket in Brooklyn, New York, around the vicinity of where REIZIN resides. The motorcycles are registered to REIZIN, and the license plate on at least one of them reads “RUSIK,” which I am informed is short for “Ruslan” (REIZIN’s first name) in Russian.

13. During this meeting, REIZIN stated that members of Bratva put money into Bratva’s *obshchak* regularly. REIZIN then explained some of the purposes for which Bratva uses the money:

REIZIN: This money are going to be send away—this money would go to *obshchak* [unintelligible]. You know, I didn’t fucking make any money here.

VICTIM: This money [unintelligible].

REIZIN: It’s not my money. This money goes to *obshchak* where we divide them. We do our business, whatever we need there—um, people [unintelligible] to the guys who are in trouble, to the guys who fall into disgrace. We also finance parties with this money so it happens sometime that [unintelligible] but money allocated for some penalty the money that we’re spending together for some other businesses—well, that is *obshchak*.

14. Text messages reviewed by the FBI from the Victim’s telephone show communication between the Victim and REIZIN on or about July 23, 2017. For example, in one message the Victim asked “Can I call you later?” A little over an hour later, REIZIN wrote in a text message, “I’m waiting for your phone calls” and “Why did you not call me

yet?” At the direction of agents, the Victim placed a monitored call to REIZIN to discuss arrangements for the delivery of the second installment payment.

15. The following day, on July 24, 2017, the Victim spoke with REIZIN by telephone again. During this phone call, the Victim asked to push the meeting to 8:30 (“Will 8:30 be okay?”). REIZIN responded by insisting on meeting at his house instead of the Roll-N-Roaster restaurant. The Victim stated that he would call back, at which point he discussed with the agents potentially meeting REIZIN at his residence. Because of safety concerns, the agents advised the Victim to resist doing so and insist on meeting at the restaurant. The Victim called REIZIN and stated that he would meet REIZIN at the Roll-N-Roaster restaurant, to which REIZIN responded, “No, we agreed that you would come to my house.” The Victim stated, “Ruslan, I don’t feel comfortable,” which I believe is a reference to REIZIN’s prior assault of the Victim. REIZIN, however, stated that he would only meet the Victim at his house, and implicitly threatened the Victim if the Victim did not come: “I won’t go to Roll-N-Roaster. I’m telling you we’ll have a problem. I’ll be downstairs, I’m fucking sick of it. I will not be at Roll-N-Roaster. I am downstairs. I’ll be at my house in 5 minutes. That’s it, good-bye.” The Victim and agents interpreted this statement (“we’ll have a problem”) to mean that the Victim would be assaulted again if he did not come to REIZIN’s residence. As a result, the Victim agreed to go to REIZIN’s residence.

16. On or about July 24, 2017, the Victim met with REIZIN near REIZIN’s residence in Brooklyn, while agents conducted surveillance. Following the meeting, the Victim met agents at a predetermined location and informed agents that he gave \$200 (supplied by the FBI) to REIZIN. During the brief meeting, REIZIN could be heard stating in sum and substance, “You owe me 4600? Did you calculate how it would work? 200

payments for two years.” In other words, REIZIN confirmed that after making two \$200 payments, the Victim owed \$4,600.

17. On or about August 17, 2017, the Victim called REIZIN to say that he had the \$200 monthly payment earlier than usual that month: “I put together a couple hundred. I’m thinking I could give that to you this evening.” REIZIN responded that he was in Florida and would be travelling to the Dominican Republic until August 25th, stating that, “We’ll see each other on the 26th or the 27th.” On August 26, 2017, the Victim called REIZIN and stated that he would be with his family over the weekend and preferred to meet the following week. REIZIN agreed to meet on Tuesday, suggesting, “Around 8:00 by my house, right,” which I know meant Tuesday, August 29, 2017 at 8:00 p.m.

18. On or about August 29, 2017, after a telephone conversation between the Victim and REIZIN, the two arranged to meet in Brooklyn, New York that day, outside of REIZIN’s residence for the Victim to make his third installment payment. Law enforcement conducted surveillance of the meeting and recorded a video of the conversation between the two men.

19. During the recorded meeting, REIZIN told the Victim the following, in sum and substance: “This fucking shit is really serious. Remember we had an agreement and you had a question for me? Basically it was, ‘How would I know? If I would give you this five – you won’t be going after me?’ That was a question, right? I’ve told you that I will not going to do that, but with one condition – you are not going to fucking work in Brooklyn.” Based on my training and experience and familiarity with this investigation, I believe that REIZIN was confirming the extortionate terms of his arrangement with the Victim, which provided that the Victim would not be assaulted again, so long as he

continued to pay Bratva, through REIZIN, and did not operate his cleaning business in Brooklyn.<sup>10</sup> During this conversation, REIZIN stated that the Victim would “have a problem” if he works in Brooklyn, and that if the Victim has any clients there, “transfer them to me and I will fucking give you 50 percent from work.” During this meeting, REIZIN can be seen and heard counting the installment payment.

20. On or about September 28, 2017, the Victim made a fourth installment payment to REIZIN. At approximately 7:25 p.m., the Victim sent REIZIN a text message, “I’m on my way back. Will be downstairs [sic] your house at 8.” REIZIN responded with a text message stating, “Call me when you [sic] downstairs and I will come down.” I have reviewed a screenshot of both messages from the Victim’s telephone and saw that they were sent from the REIZIN Phone, which is saved under “Ruslan” in the Victim’s phone. In addition, REIZIN and the Victim had a brief conversation over the telephone, in which REIZIN confirmed, “I’m downstairs.”

21. The Victim met with REIZIN while law enforcement conducted surveillance. According to the Victim, REIZIN wore a shirt with the name “Bratva” on it. During the recorded meeting, after the Victim paid another \$200 (supplied by the FBI), REIZIN emphasized again to the Victim that he could not work in Williamsburg or Brooklyn more generally, and that he would “fuck up” the Victim if the Victim broke this rule. REIZIN asked the Victim to walk with him to show the Victim REIZIN’s new vehicle, but

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<sup>10</sup> According to the Victim, the Victim uses an automobile, which I am informed was assembled outside the state of New York. Among the tools he has used, the Victim has used a Dewalt pressure washer and Werner ladder, both of which I am also informed are manufactured outside of New York state. The Victim explained that he usually purchases his supplies from Home Depot.

the Victim stated he did not feel safe. REIZIN told the Victim that if REIZIN wanted to hurt him, the Victim would not see REIZIN coming. At the end of the meeting, REIZIN entered a gray Lexus vehicle that was parked in the vicinity of this location.

22. On or about November 1, 2017, the Victim made a fifth installment payment under the same procedure. During the meeting, REIZIN told the Victim that REIZIN would be seeing the Victim twice in November, which the Victim understood meant that the Victim had to make two payments, one toward the end of November. Towards the end of the meeting, REIZIN confirmed the agreement (that the Victim would not work in Brooklyn) again by stating, “Do we understand each other about working in Brooklyn?”

WHEREFORE, your deponent respectfully requests that the defendants  
RUSLAN REIZIN and MARK KRIVOI, be dealt with according to law.

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Luke B. Hardison  
Special Agent  
Federal Bureau of Investigation

Sworn to before me this  
29 day of November, 2017

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THE HONORABLE ROANNE L. MANN  
CHIEF UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK