


MKM:KDE/LKG  
F.#2017R02274

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -


MICHAEL CRUMBLE,  
RAMELL MARKUS,  
also known as "Rah," "Dollah" and  
"Smooth," and  


Defendants.

-----X

THE GRAND JURY CHARGES:

COUNT ONE  
(Kidnaping Conspiracy)

1. In or about December 2017, within the Eastern District of New York and elsewhere, the defendants MICHAEL CRUMBLE, RAMELL MARKUS, also known as "Rah," "Dollah" and "Smooth," and  did knowingly and intentionally conspire to seize, confine, inveigle, kidnap, abduct and carry away and hold, for ransom and reward and otherwise, a person, to wit: John Doe, an individual whose identity is known to the Grand Jury, and to use one or more means, facilities and instrumentalities of interstate and foreign commerce, to wit: cellular telephones, in committing and in furtherance of the commission of the offense, contrary to Title 18, United States Code, Section 1201(a)(1).

FILED  
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U.S. DISTRICT COURT  
EASTERN DISTRICT  
OF NEW YORK

INDICTMENT

Cr. No. **CR 18 0032**

(T. 18, U.S.C., §§ 924(c)(1)(A)(i),  
924(c)(1)(A)(ii), 924(d), 981(a)(1)(C),  
1201(a)(1), 1201(c), 1951(a), 2 and  
3551 et seq.; T. 21, U.S.C., § 853(p);  
T. 28, U.S.C., § 2461(c))

ROSS, J.

MANN. M.J.

2. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendants did commit and cause to be committed, among others, the following:

Overt Acts

(a) On or about December 18, 2017, [REDACTED] in the presence of MARKUS and CRUMBLE, pointed a firearm at the head of John Doe inside a vehicle;

(b) On or about December 18, 2017, MARKUS, in the presence of CRUMBLE and [REDACTED] pistol-whipped John Doe in the head inside a vehicle;

(c) On or about December 18, 2017, CRUMBLE, MARKUS and [REDACTED] drove John Doe to a residence and forced him to enter the residence; and

(d) On or about December 18, 2017, [REDACTED] in the presence of CRUMBLE and MARKUS, burned John Doe's arms with a hot clothing iron.

(Title 18, United States Code, Sections 1201(c) and 3551 et seq.)

COUNT TWO  
(Kidnaping)

3. On or about December 18, 2017, within the Eastern District of New York and elsewhere, the defendants MICHAEL CRUMBLE, RAMELL MARKUS, also known as "Rah," "Dollah" and "Smooth," and [REDACTED] did knowingly and intentionally seize, confine, inveigle, kidnap, abduct and carry away and hold, for ransom and reward and otherwise, one or more persons, to wit: John Doe, and use

one or more means, facilities and instrumentalities of interstate and foreign commerce, to wit: cellular telephones, in committing and in furtherance of the commission of the offense.

(Title 18, United States Code, Sections 1201(a)(1), 2 and 3551 et seq.)

COUNT THREE  
(Hobbs Act Extortion Conspiracy)

4. In or about December 2017, within the Eastern District of New York and elsewhere, the defendants MICHAEL CRUMBLE, RAMELL MARKUS, also known as “Rah,” “Dollah” and “Smooth,” and [REDACTED] did knowingly and intentionally conspire to obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendants and others agreed to obtain property, to wit: narcotics and United States currency, from John Doe, with his consent, which consent was to be induced through wrongful use of actual and threatened force, violence and fear.

(Title 18, United States Code, Sections 1951(a) and 3551 et seq.)

COUNT FOUR  
(Hobbs Act Extortion)

5. In or about December 2017, within the Eastern District of New York and elsewhere, the defendants MICHAEL CRUMBLE, RAMELL MARKUS, also known as “Rah,” “Dollah” and “Smooth,” and [REDACTED] did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendants and others obtained property,

to wit: narcotics and United States currency, from John Doe, with his consent, which consent was induced through wrongful use of actual and threatened force, violence and fear.

(Title 18, United States Code, Sections 1951(a) and 3551 et seq.)

COUNT FIVE

(Using, Carrying and Possessing a Firearm)

6. On or about and between December 17, 2017 and December 18, 2017, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants MICHAEL CRUMBLE, RAMELL MARKUS, also known as "Rah," "Dollah" and "Smooth," and [REDACTED] did knowingly and intentionally use and carry one or more firearms during and in relation to one or more crimes of violence, to wit: the crimes charged in Counts One through Four, and did knowingly and intentionally possess said firearms in furtherance of such crimes of violence, one or more of which firearms were brandished.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), 924(c)(1)(A)(ii), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION  
AS TO COUNTS ONE THROUGH FOUR

7. The United States hereby gives notice to the defendants that, upon their conviction of any of the offenses charged in Counts One through Four, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offenses to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offenses.

8. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

CRIMINAL FORFEITURE ALLEGATION  
AS TO COUNT FIVE

9. The United States hereby gives notice to the defendants that, upon their conviction of the offense charged in Count Five, the government will seek forfeiture in accordance with Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), which require the forfeiture of any firearm or ammunition involved in or used in any knowing violation of Title 18, United States Code, Section 924.

10. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;


it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 924(d); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL



FOREPERSON



RICHARD P. DONOGHUE  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK



No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

---

THE UNITED STATES OF AMERICA

vs.

*MICHAEL CRUMBLE, RAMELL MARKUS, also known as "Rah,"  
"Dollah" and "Smooth," and* [REDACTED]

Defendants.

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**INDICTMENT**

(T. 18, U.S.C., §§ 924(c)(1)(A)(i), 924(c)(1)(A)(ii), 924(d),  
981(a)(1)(C), 1201(a)(1), 1201(c), 1951(a), 2 and 3551 et seq.; T. 21,  
U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

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*A true bill.*

\_\_\_\_\_  
*Foreperson*

Filed in open court this \_\_\_\_\_ day,

of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

\_\_\_\_\_  
*Clerk*

Bail, \$ \_\_\_\_\_

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Lindsay K. Gerdes, Assistant U.S. Attorney (718) 254-6155*