

SUPREME COURT OF THE STATE OF NEW YORK
KINGS COUNTY: CRIMINAL TERM

CRIMINAL TERM ARR/MOT
SUPREME COURT KINGS

2013 OCT 16 PM 3:36

THE PEOPLE OF THE STATE OF NEW YORK

-against-

IND. NO. 8758/2013

BASEL RAMADAN, A.K.A. ABU SALAH,
YOUSSEFF ODEH, A.K.A. ABU MAHMOUD

11-A

DEFENDANTS.

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COUNT ONE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, and Yousseff Odeh, a.k.a. Abu Mahmoud, each aiding the other and acting in concert with each other and others known and unknown to the Grand Jury, committed the crime of Conspiracy in the Second Degree in violation of Penal Law Section 105.15, committed as follows:

The defendants, from on or about and between May 24, 2013 and October 11, 2013, in Kings County, Bronx County and elsewhere within the State of New York, with intent that conduct constituting a class A felony be performed, to wit: **Murder in the Second Degree** in violation of **N.Y. Penal Law. §125.25(1)**, agreed with one or more persons, and with one another, to engage in or cause the performance of such conduct.

PREAMBLE

During the course of the above-described conspiracy it was the stated goal of defendant Ramadan and defendant Odeh to kill several individuals whom the defendants believed to be witnesses against them in the prosecution of Kings County Indictment #3592/2013, which charges the defendants with, *inter alia*, Enterprise Corruption, under P.L. §460.20(1)(a).

In order to carry out the above stated goal of the conspiracy, both defendants discussed and agreed with individuals, whose identities are known to law enforcement, that the individuals would carry out the goal of the conspiracy by intentionally causing, or recruiting other individuals to cause, the death of persons the defendants believed to be witnesses against them on behalf of the prosecution.

OVERT ACTS

In furtherance of said conspiracy and to effect the objects thereof, and during the course thereof, the following overt acts, among others, were committed:

On or about August 24, 2013, defendant Ramadan provided an individual, whose identity is known to the Grand Jury with information pertaining to the the targets of the murder conspiracy, including the name and home address for one of the murder targets, whose identity is known to the grand jury, as well as a description and place of business of another murder target, whose identity is known to the grand jury.

On or about August 24, 2013, defendant Odeh provided an individual, whose identity is known to the Grand Jury with descriptive information pertaining to the targets of the murder conspiracy, whose identities are known to the grand jury.

On or about September 17, 2013, defendant Ramadan spoke via telephone to an undercover police officer, who was posing as a prospective killer for hire. During the call, Ramadan stated in sum and substance that he has "one of those problems" and when the undercover police officer stated in sum and substance that he could "take care of it", Ramadan stated in sum and substance that he appreciates it. Ramadan further stated in sum and substance to the undercover officer that the individual, whose identity is known to the Grand Jury, may "need some help."

COUNT TWO

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the Defendants Basel Ramadan, a.k.a. Abu Salah, and Yousseff Odeh, a.k.a. Abu

Mahmoud, each aiding the other and acting in concert with each other and others known and unknown to the Grand Jury, committed the crime of committed the crime of **Criminal Solicitation in the Second Degree** in violation of **Penal Law Section 100.10**, committed as follows:

The defendants, from on or about and between May 24, 2013, and October 11, 2013, in Kings County, Bronx County and elsewhere within the State of New York, with the intent that another person engage in a class A felony, to wit: **Murder in the Second Degree** in violation of **N.Y. Penal Law. §125.25(1)**, solicited, commanded, importuned or otherwise attempted to cause such other person or persons to engage in such conduct, in that the defendants, while believing that certain persons, whose identities are known to the grand jury, intended to be witnesses against the defendants in the prosecution of charges pending against the defendants on Kings County Indictment #3592/2013, solicited, requested and importuned other individuals, whose identities are known to law enforcement, to cause the death these certain persons whom the defendants believed to be witnesses against them.

PERI ALYSE KADANOFF
Deputy Attorney General
Organized Crime Task Force

By



JONATHAN R. SENNETT
Assistant Deputy Attorney General

A TRUE BILL



GRAND JURY FOREPERSON

Dated: October 11, 2013

OCT 16 2013

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

THE PEOPLE OF THE STATE OF NEW YORK

- against -

YOUSSEFF ODEH, A/K/A ABU MAHMOUD
BASEL RAMADAN, A/K/A ABU SALAH,

Defendants.

INDICTMENT NO. 08758-2013

CONSPIRACY IN THE SECOND DEGREE – PL SECTION 105.15
All Defendants

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