

I N D I C T M E N T

S U P R E M E C O U R T O F T H E S T A T E O F N E W Y O R K  
C O U N T Y O F Q U E E N S

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THE PEOPLE OF THE STATE OF NEW YORK

AGAINST

KEVIN RAMTAHAL - VFO  
DEFENDANT  
CR-037045-19QN  
NYSID# 12408719M

FILED:  
INDICTMENT NO. 2499/2019

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PL 120.05-4      ASSAULT IN THE SECOND DEGREE (1)  
PL 120.20        RECKLESS ENDANGERMENT IN THE SECOND DEGREE (2)  
PL 260.10-1      ENDANGERING THE WELFARE OF A CHILD (3)  
PL 120.15        MENACING IN THE THIRD DEGREE (4,8,12,16)  
PL 240.30-3      AGGRAVATED HARASSMENT IN THE SECOND DEGREE  
                  (5,9,13,17)  
PL 240.26-1      HARASSMENT IN THE SECOND DEGREE (6,10,14,18)  
PL 240.20-1      DISORDERLY CONDUCT (7,11,15,19)

A TRUE BILL

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FOREMAN

ACTING DISTRICT ATTORNEY

FIRST COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANT OF ASSAULT IN THE SECOND DEGREE COMMITTED AS  
FOLLOWS:

THE DEFENDANT, ON OR ABOUT DECEMBER 06, 2019 IN THE COUNTY OF  
QUEENS, RECKLESSLY CAUSED SERIOUS PHYSICAL INJURY TO AMARA WILKS, BY  
MEANS OF A DANGEROUS INSTRUMENT.

SECOND COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANT OF RECKLESS ENDANGERMENT IN THE SECOND DEGREE  
COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT DECEMBER 06, 2019 IN THE COUNTY OF  
QUEENS, RECKLESSLY ENGAGED IN CONDUCT WHICH CREATED A SUBSTANTIAL RISK  
OF SERIOUS PHYSICAL INJURY TO ANOTHER PERSON.

THIRD COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANT OF ENDANGERING THE WELFARE OF A CHILD COMMITTED AS  
FOLLOWS:

THE DEFENDANT, ON OR ABOUT DECEMBER 06, 2019 IN THE COUNTY OF  
QUEENS, KNOWINGLY ACTED IN A MANNER LIKELY TO BE INJURIOUS TO THE  
PHYSICAL, MENTAL OR MORAL WELFARE OF AMARA WILKS, A CHILD LESS THAN  
SEVENTEEN YEARS OLD.

FOURTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANT OF MENACING IN THE THIRD DEGREE COMMITTED AS  
FOLLOWS:

THE DEFENDANT, ON OR ABOUT DECEMBER 06, 2019 IN THE COUNTY OF  
QUEENS, BY PHYSICAL MENACE, INTENTIONALLY PLACED OR ATTEMPTED TO PLACE  
AMARA WILKS IN FEAR OF DEATH, IMMINENT SERIOUS PHYSICAL INJURY OR  
IMMINENT PHYSICAL INJURY.

FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANT OF AGGRAVATED HARASSMENT IN THE SECOND DEGREE  
COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT DECEMBER 06, 2019 IN THE COUNTY OF  
QUEENS, WITH INTENT TO HARASS, ANNOY, THREATEN OR ALARM ANOTHER PERSON,  
STRUCK, SHOVED, KICKED, OR OTHERWISE SUBJECTED AMARA WILKS TO PHYSICAL  
CONTACT, OR ATTEMPTED OR THREATENED TO DO THE SAME BECAUSE OF A BELIEF  
OR PERCEPTION REGARDING HER RACE, COLOR, NATIONAL ORIGIN, ANCESTRY,  
GENDER, RELIGION, RELIGIOUS PRACTICE, AGE OF SIXTY YEARS OLD OR MORE,  
DISABILITY OR SEXUAL ORIENTATION, REGARDLESS OF WHETHER THE BELIEF OR  
PERCEPTION WAS CORRECT.

SIXTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANT OF HARASSMENT IN THE SECOND DEGREE COMMITTED AS  
FOLLOWS:

THE DEFENDANT, ON OR ABOUT DECEMBER 06, 2019 IN THE COUNTY OF  
QUEENS, WITH THE INTENT TO HARASS, ANNOY OR ALARM AMARA WILKS, STRUCK,  
SHOVED, KICKED OR OTHERWISE SUBJECTED AMARA WILKS TO PHYSICAL CONTACT,  
OR ATTEMPTED OR THREATENED TO DO THE SAME.

SEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANT OF DISORDERLY CONDUCT COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT DECEMBER 06, 2019 IN THE COUNTY OF  
QUEENS, WITH INTENT TO CAUSE PUBLIC INCONVENIENCE, ANNOYANCE OR ALARM,  
OR RECKLESSLY CREATE A RISK THEREOF, ENGAGED IN FIGHTING OR IN  
VIOLENT, TUMULTUOUS OR THREATENING BEHAVIOR.

EIGHTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF MENACING IN THE THIRD DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT DECEMBER 06, 2019 IN THE COUNTY OF QUEENS, BY PHYSICAL MENACE, INTENTIONALLY PLACED OR ATTEMPTED TO PLACE ANOTHER PERSON, HEREINAFTER JANE DOE NUMBER ONE, IN FEAR OF DEATH, IMMINENT SERIOUS PHYSICAL INJURY OR IMMINENT PHYSICAL INJURY.

NINTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT, ACCUSES THE DEFENDANT OF AGGRAVATED HARASSMENT IN THE SECOND DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT DECEMBER 06, 2019 IN THE COUNTY OF QUEENS, WITH INTENT TO HARASS, ANNOY, THREATEN OR ALARM ANOTHER PERSON, STRUCK, SHOVED, KICKED, OR OTHERWISE SUBJECTED JANE DOE NUMBER ONE TO PHYSICAL CONTACT, OR ATTEMPTED OR THREATENED TO DO THE SAME BECAUSE OF A BELIEF OR PERCEPTION REGARDING HER RACE, COLOR, NATIONAL ORIGIN, ANCESTRY, GENDER, RELIGION, RELIGIOUS PRACTICE, AGE OF SIXTY YEARS OLD OR MORE, DISABILITY OR SEXUAL ORIENTATION, REGARDLESS OF WHETHER THE BELIEF OR PERCEPTION WAS CORRECT.

TENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANT OF HARASSMENT IN THE SECOND DEGREE COMMITTED AS  
FOLLOWS:

THE DEFENDANT, ON OR ABOUT DECEMBER 06, 2019 IN THE COUNTY OF  
QUEENS, WITH THE INTENT TO HARASS, ANNOY OR ALARM JANE DOE NUMBER ONE,  
STRUCK, SHOVED, KICKED OR OTHERWISE SUBJECTED JANE DOE NUMBER ONE TO  
PHYSICAL CONTACT, OR ATTEMPTED OR THREATENED TO DO THE SAME.

ELEVENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANT OF DISORDERLY CONDUCT COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT DECEMBER 06, 2019 IN THE COUNTY OF  
QUEENS, WITH INTENT TO CAUSE PUBLIC INCONVENIENCE, ANNOYANCE OR ALARM,  
OR RECKLESSLY CREATE A RISK THEREOF, ENGAGED IN FIGHTING OR IN  
VIOLENT, TUMULTUOUS OR THREATENING BEHAVIOR.

TWELFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANT OF MENACING IN THE THIRD DEGREE COMMITTED AS  
FOLLOWS:

THE DEFENDANT, ON OR ABOUT DECEMBER 06, 2019 IN THE COUNTY OF  
QUEENS, BY PHYSICAL MENACE, INTENTIONALLY PLACED OR ATTEMPTED TO PLACE  
ANOTHER PERSON, HEREINAFTER JANE DOE NUMBER TWO, IN FEAR OF DEATH,  
IMMINENT SERIOUS PHYSICAL INJURY OR IMMINENT PHYSICAL INJURY.

THIRTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANT OF AGGRAVATED HARASSMENT IN THE SECOND DEGREE  
COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT DECEMBER 06, 2019 IN THE COUNTY OF  
QUEENS, WITH INTENT TO HARASS, ANNOY, THREATEN OR ALARM ANOTHER PERSON,  
STRUCK, SHOVED, KICKED, OR OTHERWISE SUBJECTED JANE DOE NUMBER TWO TO  
PHYSICAL CONTACT, OR ATTEMPTED OR THREATENED TO DO THE SAME BECAUSE OF A  
BELIEF OR PERCEPTION REGARDING HER RACE, COLOR, NATIONAL ORIGIN,  
ANCESTRY, GENDER, RELIGION, RELIGIOUS PRACTICE, AGE OF SIXTY YEARS OLD  
OR MORE, DISABILITY OR SEXUAL ORIENTATION, REGARDLESS OF WHETHER THE  
BELIEF OR PERCEPTION WAS CORRECT.



FOURTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANT OF HARASSMENT IN THE SECOND DEGREE COMMITTED AS  
FOLLOWS:

THE DEFENDANT, ON OR ABOUT DECEMBER 06, 2019 IN THE COUNTY OF  
QUEENS, WITH THE INTENT TO HARASS, ANNOY OR ALARM JANE DOE NUMBER TWO,  
STRUCK, SHOVED, KICKED OR OTHERWISE SUBJECTED JANE DOE NUMBER TWO TO  
PHYSICAL CONTACT, OR ATTEMPTED OR THREATENED TO DO THE SAME.

FIFTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANT OF DISORDERLY CONDUCT COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT DECEMBER 06, 2019 IN THE COUNTY OF  
QUEENS, WITH INTENT TO CAUSE PUBLIC INCONVENIENCE, ANNOYANCE OR ALARM,  
OR RECKLESSLY CREATE A RISK THEREOF, ENGAGED IN FIGHTING OR IN  
VIOLENT, TUMULTUOUS OR THREATENING BEHAVIOR.

SIXTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANT OF MENACING IN THE THIRD DEGREE COMMITTED AS  
FOLLOWS:

THE DEFENDANT, ON OR ABOUT DECEMBER 06, 2019 IN THE COUNTY OF  
QUEENS, BY PHYSICAL MENACE, INTENTIONALLY PLACED OR ATTEMPTED TO PLACE  
ANOTHER PERSON, HEREINAFTER JANE DOE NUMBER THREE, IN FEAR OF DEATH,  
IMMINENT SERIOUS PHYSICAL INJURY OR IMMINENT PHYSICAL INJURY.

SEVENTEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANT OF AGGRAVATED HARASSMENT IN THE SECOND DEGREE  
COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT DECEMBER 06, 2019 IN THE COUNTY OF  
QUEENS, WITH INTENT TO HARASS, ANNOY, THREATEN OR ALARM ANOTHER PERSON,  
STRUCK, SHOVED, KICKED, OR OTHERWISE SUBJECTED JANE DOE NUMBER THREE  
TO PHYSICAL CONTACT, OR ATTEMPTED OR THREATENED TO DO THE SAME BECAUSE  
OF A BELIEF OR PERCEPTION REGARDING HER RACE, COLOR, NATIONAL ORIGIN,  
ANCESTRY, GENDER, RELIGION, RELIGIOUS PRACTICE, AGE OF SIXTY YEARS OLD  
OR MORE, DISABILITY OR SEXUAL ORIENTATION, REGARDLESS OF WHETHER THE  
BELIEF OR PERCEPTION WAS CORRECT.

EIGHTEENTH COUNT

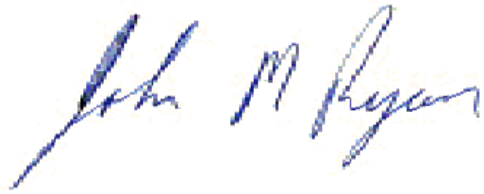
THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANT OF HARASSMENT IN THE SECOND DEGREE COMMITTED AS  
FOLLOWS:

THE DEFENDANT, ON OR ABOUT DECEMBER 06, 2019 IN THE COUNTY OF  
QUEENS, WITH THE INTENT TO HARASS, ANNOY OR ALARM JANE DOE NUMBER THREE,  
STRUCK, SHOVED, KICKED OR OTHERWISE SUBJECTED JANE DOE NUMBER THREE TO  
PHYSICAL CONTACT, OR ATTEMPTED OR THREATENED TO DO THE SAME.

NINETEENTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,  
ACCUSES THE DEFENDANT OF DISORDERLY CONDUCT COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT DECEMBER 06, 2019 IN THE COUNTY OF  
QUEENS, WITH INTENT TO CAUSE PUBLIC INCONVENIENCE, ANNOYANCE OR ALARM,  
OR RECKLESSLY CREATE A RISK THEREOF, ENGAGED IN FIGHTING OR IN  
VIOLENT, TUMULTUOUS OR THREATENING BEHAVIOR.

A handwritten signature in blue ink, reading "John M. Ryan". The signature is written in a cursive style with a prominent initial "J" and "R".

JOHN M. RYAN  
ACTING DISTRICT ATTORNEY