UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

RAMEL DECKARD, DASHAWN HAMPTON, and TALIEK PAYNE,

Defendants.

24 MAG 880

SEALED COMPLAINT

Violations of 18 U.S.C. §§ 1951, 924(c)(1)(A)(ii), and 2

COUNTY OF OFFENSE: BRONX

SOUTHERN DISTRICT OF NEW YORK, ss.:

KERRI KUHL, being duly sworn, deposes and says that she is a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives ("ATF"), and charges as follows:

COUNT ONE

(Conspiracy to Commit Hobbs Act Robbery)

1. From at least on or about August 15, 2023, through at least on or about January 6, 2024, in the Southern District of New York and elsewhere, RAMEL DECKARD, DASHAWN HAMPTON, and TALIEK PAYNE, the defendants, and others known and unknown, knowingly combined, conspired, confederated, and agreed together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, DECKARD, HAMPTON, and PAYNE conspired with one another to rob individuals who participated in sex work at hotels in the Bronx, New York.

(Title 18, United States Code, Section 1951.)

COUNT TWO

(Hobbs Act Robbery)

2. On or about August 15, 2023, in the Southern District of New York and elsewhere, RAMEL DECKARD, the defendant, knowingly committed robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and thereby obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, DECKARD robbed at gunpoint an individual who was engaged in sex work at a hotel in the vicinity of Grand Concourse and East 140th Street in the Bronx, New York.

COUNT THREE

(Hobbs Act Robbery)

3. On or about September 19, 2023, in the Southern District of New York and elsewhere, RAMEL DECKARD and TALIEK PAYNE, the defendants, knowingly committed robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and thereby obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and aided and abetted the same, to wit, DECKARD and PAYNE robbed at gunpoint two individuals who were engaged in sex work at a hotel in the vicinity of East Tremont Avenue and Prospect Avenue in the Bronx, New York.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT FOUR

(Hobbs Act Robbery)

4. On or about January 6, 2024, in the Southern District of New York and elsewhere, RAMEL DECKARD and DASHAWN HAMPTON, the defendants, knowingly committed robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and thereby obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and aided and abetted the same, to wit, DECKARD and HAMPTON robbed at gunpoint an individual who was engaged in sex work at a hotel in the vicinity of East Tremont Avenue and Prospect Avenue in the Bronx, New York.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT FIVE(Firearms Use, Carrying, and Possession)

5. On or about August 15, 2023, in the Southern District of New York and elsewhere, RAMEL DECKARD, the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the Hobbs Act robbery charged in Count Two of this Complaint, knowingly used and carried a firearm, and in furtherance of such crime, possessed a firearm, which was brandished.

(Title 18, United States Code, Section 924(c)(1)(A)(i) and (ii).)

COUNT SIX (Firearms Use, Carrying, and Possession)

6. On or about September 19, 2023, in the Southern District of New York and elsewhere, RAMEL DECKARD and TALIEK PAYNE, the defendants, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the

Hobbs Act robbery charged in Count Three of this Complaint, knowingly used and carried a firearm, and in furtherance of such crime, possessed a firearm, and aided and abetted the use, carrying, and possession of a firearm, which was brandished.

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

COUNT SEVEN

(Firearms Use, Carrying, and Possession)

7. On or about January 6, 2024, in the Southern District of New York and elsewhere, RAMEL DECKARD and DASHAWN HAMPTON, the defendants, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the Hobbs Act robbery charged in Count Four of this Complaint, knowingly used and carried a firearm, and in furtherance of such crime, possessed a firearm, and aided and abetted the use, carrying, and possession of a firearm, which was brandished.

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

The bases for my knowledge and for the foregoing charges are, in part, as follows:

8. I am a Special Agent with ATF. I have been personally involved in the investigation of this matter. This affidavit is based upon my conversations with law enforcement officers, victims, witnesses, and others, my examination of documents, videos, reports and records, and my involvement in this investigation. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all of the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

August 15, 2023 Robbery ("Robbery-1")

- 9. Based on my participation in the investigation of this matter, my conversations with other law enforcement officers as well as with a victim ("Victim-1"), my review of law enforcement reports and records, and my review of surveillance videos related to a robbery that occurred on or about August 15, 2023 ("Robbery-1"), I have learned the following, in substance and in part:
- a. On or about August 15, 2023, an individual reached out to Victim-1 via text message and asked to set up an appointment with Victim-1 to engage in sexual activities in exchange for payment. At that time, Victim-1 was engaged in sex work. Several months prior, Victim-1 had traveled from another state to New York State to perform this work. Victim-1 advertised her services on various online platforms. Victim-1 and the individual arranged to meet that day at a room located at a hotel in the vicinity of Grand Concourse and East 140th Street in the Bronx ("Hotel-1").
- b. On or about August 15, 2023, at approximately 1:30 p.m., an individual ("Perpetrator-1") entered Hotel-1. After entering the lobby of Hotel-1, Perpetrator-1 took the

elevator to Victim-1's hotel room. Perpetrator-1 waited outside of the hotel room until Victim-1 let him in. Still images of Perpetrator-1—who had several tattoos, including a neck tattoo—getting off of the elevator on the ninth floor of Hotel-1 and then approaching Victim-1's hotel room are pictured below:



- c. After he was inside of Victim-1's hotel room, Perpetrator-1 paid Victim-1 in cash.
- d. Subsequently, Perpetrator-1 displayed a firearm and demanded that Victim-1 go into the bathroom of the hotel room and sit in the shower. Perpetrator-1 then stole from Victim-1 two cellphones, cash, and Victim-1's learner's permit.
- e. At approximately 1:50 p.m., Perpetrator-1 exited Victim-1's hotel room and subsequently exited Hotel-1.

September 19, 2023 Robbery ("Robbery-2")

- 10. Based on my participation in the investigation of this matter, my conversations with other law enforcement officers as well as with two victims ("Victim-2" and "Victim-3"), my review of law enforcement reports and records, and my review of surveillance videos related to a robbery that occurred on or about September 19, 2023 ("Robbery-2"), I have learned the following, in substance and in part:
- a. On or about September 19, 2023, Victim-2 and Victim-3 were engaged in sex work. Another individual ("Individual-1") advertised Victim-2's and Victim-3's services on

¹ Law enforcement notes state that Victim-1 initially reported that Perpetrator-1 stole \$1,000 from her bag. However, Victim-1 later told law enforcement that Perpetrator-1 robbed her of \$920, including the cash that he had paid her.

² Victim-2 and Victim-3 initially told law enforcement that they had been robbed by a DoorDash delivery driver.

a website. Prior to September 19, 2023, Victim-2 had traveled from another state to New York State to perform this work.

- b. On or about September 19, 2023, Victim-2 and Victim-3 were at a hotel room located at East Tremont Avenue and Prospect Avenue in the Bronx, New York ("Hotel-2"). Individual-1 reached out to Victim-2 to tell her that someone would come to her hotel room later that day.
- c. Subsequently, on or about September 19, 2023, at approximately 12:26 p.m., an individual wearing a black baseball hat, a gray sweatshirt, and gray sweatpants, who, for the reasons stated below, I believe to be Perpetrator-1, entered Hotel-2. Approximately one minute later, a second individual ("Perpetrator-2"), wearing a black baseball hat, a black long-sleeved shirt, and gray sweatpants, also entered Hotel-2. Two images from surveillance video, which show Perpetrator-1 (left) and Perpetrator-2 (right), entering Hotel-2, are pictured below.



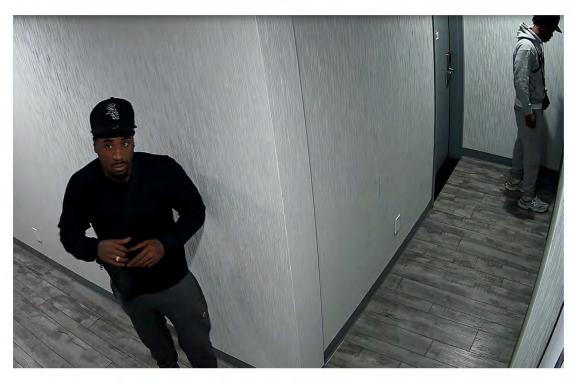


d. The security videos show that the individual who entered Hotel-2, one minute prior to Perpetrator-2, appears to be Perpetrator-1 who participated in Robbery-1. In particular, as shown below, the individual who entered Hotel-2 on or about September 19, 2023 has the same facial features, hair style, facial hair, and build as Perpetrator-1 who robbed Victim-1 on or about August 15, 2023. Additionally, both individuals are carrying a similar black bag.



Surveillance image of Perpetrator-1 from Robbery-1 (left) and surveillance image of the individual from Robbery-2 (right)

e. Once inside of Hotel-2, Perpetrator-2 and Perpetrator-1 headed toward the hotel room occupied by Victim-2 and Victim-3. Perpetrator-1 knocked on the door, while Perpetrator-2 stood back from the door. A still image of Perpetrator-1 and Perpetrator-2 waiting outside of the hotel room is pictured below.



f. After approximately 30 seconds, the door to the hotel room was opened and both Perpetrator-1 and Perpetrator-2 went inside. Inside of the hotel room, Perpetrator-1 displayed a firearm and Perpetrator-1 and Perpetrator-2 stole cash, four cellphones, and other personal items

from Victim-2 and Victim-3. Perpetrator-1 also struck Victim-2 in the face with Perpetrator-1's elbow.

- g. After approximately ten minutes, Perpetrator-1 and Perpetrator-2 left the hotel room.
- h. Surveillance footage from a camera in the vicinity of Hotel-2 shows that Perpetrator-1 arrived at the scene of Robbery-2 in a gray Mazda SUV ("Vehicle-1") approximately six minutes before he entered Hotel-2. Perpetrator-1 parked Vehicle-1 across the street from Hotel-2. Perpetrator-1 also left the scene of Robbery-2 in Vehicle-1, approximately two minutes after he exited Victim-2 and Victim-3's hotel room.
- i. Surveillance footage from a camera in the vicinity of Hotel-2 also shows that Perpetrator-2 arrived at the scene of Robbery-2 in a white vehicle with damage to the right bumper ("Vehicle-2") approximately six minutes before he entered Hotel-2. Perpetrator-2 parked Vehicle-2 across the street from Hotel-2 and directly next to Vehicle-1. Perpetrator-2 also left the scene of Robbery-2 in Vehicle-2 approximately two minutes after he left Victim-2 and Victim-3's hotel room.
- j. Surveillance footage from a bus in the vicinity of Hotel-2 captured the license plate information of a white vehicle with damage to the right bumper on the day of Robbery-2 at approximately 12:21 p.m. The license plate appeared to be associated with New Jersey and the license plate number of the vehicle was visible as "L79REG." Based on my review of this surveillance footage as well as my review of the surveillance footage showing Perpetrator-2 exiting and entering a vehicle in the vicinity of Hotel-2 around the time of Robbery-2, I believe that the white vehicle whose license plate number was captured by the bus is Vehicle-2. I therefore believe that the license plate number of Vehicle-2 is L79REG.

January 6, 2024 Robbery ("Robbery-3")

- 11. Based on my participation in the investigation of this matter, my conversations with other law enforcement officers and with Victim-1, my review of law enforcement reports and records, and my review of surveillance videos related to a robbery that occurred on or about January 6, 2024 ("Robbery-3"), I have learned the following:
- a. On or about January 6, 2024, at approximately 11:36 a.m., an individual with a cellphone ending in 4899 ("Cellphone-1") reached out to Victim-1—the same victim who was robbed on or about August 15, 2023—via text message to schedule an appointment for the individual to receive sexual services from Victim-1 in exchange for payment. The individual and Victim-1 arranged to meet at Hotel-2 the same day.
- b. Shortly before January 6, 2024, Victim-1 again traveled from another state to New York State in order to engage in sex work in New York State. On or about January 6, 2024, Victim-1 was advertising her services online.
- c. On or about January 6, 2024 at approximately 1:33 p.m., an individual ("Perpetrator-3") entered Hotel-2. Perpetrator-3 wore a black puffer coat with a hood, a baseball hat, light colored pants, and sneakers. Approximately thirty seconds later, a second individual also

entered Hotel-2. That individual wore a grey hooded sweatshirt, a purple and black North Face jacket, and dark colored pants. Still images of Perpetrator-3 (left) and the other individual (right) entering Hotel-2 are pictured below.



d. The security videos show that the second individual who followed Perpetrator-3 into Hotel-2 appears to be Perpetrator-1 from Robbery-1. In particular, as shown below, the individual who entered Hotel-2 on or about January 6, 2024 has the same facial features, facial hair, and build as Perpetrator-1 who robbed Victim-1 on or about August 15, 2023.



Surveillance Image from Robbery-1 (left) and Surveillance Image from Robbery-3 (right)

e. Once inside of Hotel-2, Perpetrator-3 and Perpetrator-1 approached Victim-1's hotel room at approximately 1:37 p.m. Perpetrator-3 knocked on the door of the hotel room, while Perpetrator-1 stood down the hallway approximately six feet away from the door of the

room. An image of surveillance footage of the two suspects standing outside of Victim-1's hotel room is shown below:



- f. Victim-1 opened the door to let Perpetrator-3 into the room. Almost immediately upon entering the hotel room, Perpetrator-3 displayed a firearm. After a few seconds, Perpetrator-1 followed Perpetrator-3 into the hotel room.
- g. Once inside of the hotel room, Perpetrator-3 told Victim-1 to go into the bathroom and lay down in the shower.
- h. Perpetrator-1 demanded, in substance and in part, that Victim-1 tell him where her wallet was and stated, in substance and in part, that he would stomp her if she did not tell him. Around the same time, Perpetrator-1 picked up Victim-1's cellphone and demanded that Victim-1 give him the passcode to the phone. When Victim-1 did not respond, Perpetrator-3 asked, in substance and in part, whether Victim-1 wanted "to die over a passcode." Victim-1 then gave them the passcode. Perpetrator-3 subsequently used a payment application ("Application-1") account on Victim-1's cellphone to send \$300 to an account with the username "\$Neverlose80" (the "Application-1 Account").
- i. Approximately ten minutes later, Perpetrator-3 and Perpetrator-1 left the hotel room with Victim-1's cellphone. Still images of Perpetrator-3 and Perpetrator-1 leaving Hotel-2 are pictured below:



j. Victim-1 later told law enforcement, in substance and in part, that she could not clearly see either of the two people who robbed her during Robbery-3. She stated, in substance and in part, that she believed that the person who displayed the firearm during Robbery-3 was taller than the person who had robbed her during Robbery-1, but that he was shorter than six feet tall. She described the other person who had robbed her during Robbery-3, in substance and in part, as "maybe five feet, two inches." She did not identify either of the individuals who robbed her on or about January 6, 2024 as the same person who had robbed her on or about August 15, 2023.

Identification of RAMEL DECKARD as Perpetrator-1

- 12. Based on my participation in the investigation of this matter, my conversations with other law enforcement officers and the victims, and my review of reports, records, and surveillance videos, I have learned the following about the identity of Perpetrator-1:
- a. On or about January 7, 2024, the day after Robbery-3, an individual deposited the cellphone that was stolen from Victim-1 during Robbery-3 into a kiosk located in the Bronx that allows individuals to sell their cellphones in exchange for cash. The kiosk captured an image of the individual who deposited the cellphone as well as an image of the state identification document that the individual who deposited the cellphone provided. The name and photograph on the state identification document are that of RAMEL DECKARD, the defendant.
- b. Based on my review of images of the individual who deposited the cellphone into the kiosk and surveillance images of Perpetrator-1 from Robbery-1, Robbery-2, and Robbery-3, I believe that the individual who deposited the cellphone into the kiosk, *i.e.*, DECKARD, is Perpetrator-1. DECKARD and Perpetrator-1 have the same hair, build, and facial features as one another. I therefore believe that DECKARD is Perpetrator-1 who conspired with others, known and unknown, to commit Robbery-1, Robbery-2, and Robbery-3.

- 13. This belief is further supported by my review of records from law enforcement databases, my review of phone records, my review of surveillance footage, and my conversations with other law enforcement officers and Victim-1, from which I have learned the following:
- a. On or about January 23, 2024, Victim-1 was shown six photographs, which consisted of one photograph of RAMEL DECKARD, the defendant, and photographs of five other individuals. Victim-1 identified the photograph of DECKARD as that of Perpetrator-1, *i.e.*, the person that had robbed her during Robbery-1.³
- b. On or about July 20, 2023, DECKARD was arrested by the New Milford Police Department. At the time of his arrest, DECKARD was driving a grey Mazda SUV, which matches the description of Vehicle-1, the vehicle that Perpetrator-1 drove to and from Robbery-2.
- c. Phone records show that on or about the day of Robbery-1, *i.e.*, August 15, 2023, a cellphone registered in the name of "DECKARD RAMEL" sent and received approximately 20 text messages to and from Victim-1's phone number.
- d. Surveillance footage from a building located at approximately 2nd Avenue and 102nd Street in Manhattan, New York ("Building-1") shows that Perpetrator-1 entered the elevator in Building-1 on floor nine and exited through the front door of Building-1 at approximately 12:48 p.m., on August 15, 2023—*i.e.*, approximately 40 minutes before Robbery-1. Perpetrator-1 wore the same clothing that he wore during Robbery-1. A still image of Perpetrator-1 exiting Building-1 is shown below:



e. On or about August 22, 2023, an individual reported to law enforcement that RAMEL DECKARD, the defendant, had made threats to that individual's family member. The individual reported that DECKARD resided at Building-1 in an apartment on the ninth floor.

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³ Victim-1 did not identify the photograph of DECKARD as a photograph of either of the two persons who had robbed her during Robbery-2. DECKARD is, based on my review of law enforcement records, approximately 5 feet, 7 inches tall.

f. Law enforcement records show that DECKARD has tattoos on his neck and arm.

Identification of TALIEK PAYNE as Perpetrator-2

- 14. Based on my participation in the investigation of this matter, my conversations with other law enforcement officers as well as with certain of the victims, and my review of law enforcement report, records, and surveillance videos, I have learned the following:
- a. Vehicle registration records for Vehicle-2, which Perpetrator-2 drove to and from Robbery-2, show that TALIEK PAYNE, the defendant, is listed as an additional owner on the registration information for Vehicle-2.
- b. Based on my review of photographs of TALIEK PAYNE available on law enforcement databases in connection with prior arrests and my review of surveillance footage of Perpetrator-2, I believe that PAYNE is Perpetrator-2 who robbed Victim-2 and Victim-3. PAYNE and Perpetrator-2 have the same facial features, including the same eyes, nose, and mouth, as well as similar hair.



Still image of Perpetrator-3 (left) and criminal history photograph of TALIEK PAYNE (right)

- c. That belief is further supported by my review of an Instagram account that appears, based on my review of photographs on the account, to belong to PAYNE (the "PAYNE Instagram account"). Based on my review of the PAYNE Instagram account, I have observed the following, in substance and in part:
- i. On or about July 16, 2023, the PAYNE Instagram account posted an image of PAYNE next to a white car with damage to its right bumper and a partial New Jersey license plate ending in "REG." Based on the color of the car, the damage to the right bumper, and the partial license plate information, I believe that this car is Vehicle-2, which was driven by Perpetrator-2 to and from Robbery-2.

ii. On or about June 14, 2020, the PAYNE Instagram account posted an image of PAYNE with an individual who appears to be RAMEL DECKARD, the defendant. I therefore believe that PAYNE and DECKARD know one another.

Identification of DASHAWN HAMPTON as Perpetrator-3

- 15. Based on my participation in the investigation of this matter, my conversations with other law enforcement officers, as well as with certain of the victims, and my review of law enforcement reports, records, and surveillance videos, I have learned the following, in substance and in part:
- a. Application-1 records show that the Application-1 Account to which Perpetrator-3 sent \$300 from Victim-1's Application-1 account is registered in the name of and with the personal identifying information of DASHAWN HAMPTON, the defendant. Those records also show that the phone number associated with the account is Cellphone-1 that was used to contact Victim-1 prior to Robbery-3.
- b. Surveillance footage from a building located on Washington Avenue in the Bronx ("Building-2") shows that an individual with the same build and features as Perpetrator-3 exited Building-2 on the date of Robbery-3 at approximately 9:52 am. I also know, based on my conversations with another law enforcement officer, that Building-2 is listed as HAMPTON's current residence in connection with his receipt of New York State benefits.
- c. Based on my comparison of video footage and photographs of HAMPTON located on law enforcement databases in connection with a transit summons and a prior arrest with surveillance footage of Perpetrator-3, I believe that HAMPTON is Perpetrator-3, i.e., the individual who robbed Victim-1 on or about January 6, 2024. HAMPTON has the same facial features, including the same eyes, nose, and mouth, and a similar build to that of Perpetrator-3. Law enforcement records also show that HAMPTON is approximately 5 feet, 9 inches tall.



Still image of Perpetrator-3 (left) and still image from surveillance footage of HAMPTON related to a Transit Adjudication Bureau summons on or about October 9, 2023 (right)

d. I have also reviewed photographs on Instagram, which depict an individual who appears to be HAMPTON with a person who appears to be RAMEL DECKARD, the defendant. One of those images is shown directly below. I therefore believe that HAMPTON and DECKARD know one another.



e. On or about January 23, 2024, Victim-1 was shown six photographs, which consisted of one photograph of HAMPTON , and photographs of five other individuals. Victim-1 did not identify the photograph of HAMPTON or any of the other photographs that she was shown as a photograph of Perpetrator-3.⁴

⁴ As noted in paragraph 11(j), Victim-1 told law enforcement, in substance and in part, that she did not get a good look at either of the two people who robbed her during Robbery-3.

WHEREFORE, I respectfully request that warrants be issued for the arrests of RAMEL DECKARD, DASHAWN HAMPTON, and TALIEK PAYNE, the defendants, and that they be arrested, and imprisoned or bailed, as the case may be.

mifer E. Willis KERRIKUHL Signed by judge with permission from Agent Kuhl

Special Agent

Bureau of Alcohol, Tobacco, Firearms, and Explosives

Sworn to me through the transmission of this Complaint by reliable electronic means (telephone), this 29th day of February, 2024.

THE HONORABLE JENNIFER E. WILLIS

United States Magistrate Judge Southern District of New York