

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA :  
 : CR. No.  
 :  
 :  
 V. : In violation of  
 : 18 U.S.C. 894(a) (1)  
 :  
 :  
 RAYMOND L. DOUGLAS III :

INDICTMENT

The Grand Jury charges that:

INTRODUCTION

At all times material to this Indictment:

1. Defendant RAYMOND L. DOUGLAS III ("DOUGLAS") was a resident of North Providence, Rhode Island.
2. DOUGLAS operated an illegal gambling business in North Providence, Rhode Island.
3. DOUGLAS' illegal gambling business accepted illegal sports wagers over the telephone on various college and professional sports, including football, basketball and

baseball.

4. DOUGLAS' illegal gambling business used one or more "runners" to collect gambling losses from bettors and pay out gambling winnings to bettors.
5. DOUGLAS extended credit to bettors by permitting them to accrue gambling debts and later collecting the losses.
6. JOHN DOE A, unnamed herein but whose identity is known to the grand jury, was a runner for DOUGLAS' illegal gambling business.
7. JOHN DOE B, unnamed herein but whose identity is known to the grand jury, accepted bets over the telephone on behalf of DOUGLAS' illegal gambling business.
8. DOUGLAS routinely changed the telephone number bettors would use to place bets with DOUGLAS' illegal gambling business.
9. JOHN DOE C, unnamed herein but whose identity is known to the grand jury, attempted to collect gambling debts on behalf of DOUGLAS' illegal gambling business.
10. BETTOR A, unnamed herein but whose identity is known to the grand jury, placed illegal sports wagers with DOUGLAS'

illegal gambling business by calling JOHN DOE A, JOHN DOE B or DOUGLAS.

11. DOUGLAS extended credit to BETTOR A in the form of accumulated gambling debts related to illegal sports wagers.
12. BETTOR A accumulated approximately \$6,000 to \$8,000 in illegal gambling debts to DOUGLAS between the fall of 2008 and the spring of 2009.
13. BETTOR A made partial payments on illegal gambling debts to DOUGLAS through the spring of 2009.
14. Between at least April 3, 2009 and June 3, 2009, DOUGLAS sent numerous text messages to BETTOR A attempting to collect illegal gambling debts from BETTOR A.
15. On or about June 3, 2009 left a voicemail for BETTOR A in which DOUGLAS stated words to the effect of:

Yeah [BETTOR A], it's me. One more, one more time. I'm hoping you come to your senses. You call me by tomorrow, and, uh, we try to work something out I guess. Obviously you're fucking avoiding me now. So I mean, you know, I don't think you can avoid me. I know

where you live, I know where you play golf. I mean I can find you. I mean I just don't think if we're friends it should have to come down to that. Uh, you wanna call me leave me a message say that's what it comes down to if you got the balls to say it to me or uh, or what the fuck the problem is. But you have till tomorrow and then uh, I guess if you don't want to call me then it's out of my hands and then someone else will knock on your door I guess or whatever. So you'll let me know. Bye.

16. Between on or about June 3, 2009 and on or about June 11, 2009, DOUGLAS sent approximately sixteen text messages seeking to collect illegal gambling debts from BETTOR A.
17. Between on or about June 11, 2009 and on or about June 16, 2009, the precise date being unknown to the grand jury, DOUGLAS sent JOHN DOE C to the home of BETTOR A to collect illegal gambling debts. JOHN DOE C approached BETTOR A's wife while BETTOR A's children played in front of BETTOR A's residence. JOHN DOE C stated to BETTOR A's wife words to the effect of "Where is [BETTOR A]? When will he be home? Tell him I'm looking for him."
18. On or about August 3, 2009, in Providence, Rhode Island,

DOUGLAS collected \$500 of an illegal gambling debt from BETTOR A.

19. On or about August 3, 2009, DOUGLAS offered to permit BETTOR A to repay a portion of the illegal gambling debt by permitting DOUGLAS to cause damage to BETTOR A's vehicle, causing a fraudulent insurance claim to be filed to pay for repairs.
20. On or about September 3, 2009, in North Providence, Rhode Island, DOUGLAS collected \$500 of an illegal gambling debt from BETTOR A.
21. On or about September 29, 2009, in North Providence, Rhode Island, DOUGLAS collected \$500 of an illegal gambling debt from BETTOR A.

COUNT ONE  
COLLECTION OF EXTENSIONS OF CREDIT BY EXTORTIONATE MEANS  
18 U.S.C. 894

22. The allegations in paragraphs 1 through 21 are hereby realleged and incorporated as if fully set forth herein.
23. Between in or about the fall of 2008 and at least September 29, 2009, in the District of Rhode Island and elsewhere,

RAYMOND L. DOUGLAS III

knowingly participated in the use of extortionate means to collect and attempt to collect an extension of credit, to wit gambling debts purported to be owed to DOUGLAS by BETTOR A.

All in violation of Title 18, United States Code, Section 894(a)(1).

## FORFEITURE ALLEGATIONS

1. The allegations contained in Count 1 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461).
  
2. Upon conviction of the offense in violation of Title 18, United States Code, Section 894 set forth in Count 1 of this Indictment, the defendant, Raymond Douglas III, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense, including, but not limited to a sum of money equal to \$1,500 in United States currency, in that this sum represents the amount of proceeds obtained as a result of the offense alleged in Count 1 of this Indictment, for which the defendant is liable.
  
3. If any of the property described above, as a result of any act or omission of the defendant:
  - 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,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461).

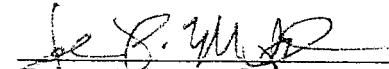
All pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

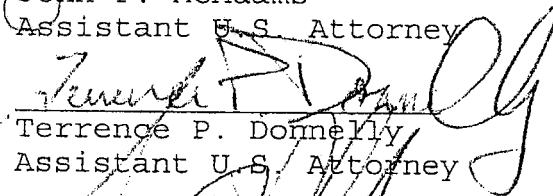
A TRUE BILL:

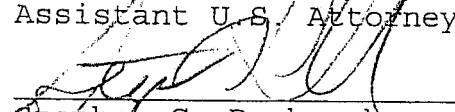
REDACTED

PETER F. NERONHA  
UNITED STATES ATTORNEY

By:

  
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Criminal Chief

Date: 9/2/10