

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

JAHRID DAWKINS,
KADIN WEST,
a/k/a "Kay Backends," and
MILAN WRIGHT,
a/k/a "BabyyThreat,"

Defendants.

INDICTMENT

26 Cr.

26 CRIM 0215

COUNT ONE
(Racketeering Conspiracy)

The Grand Jury charges:

THE ENTERPRISE

1. JAHRID DAWKINS, KADIN WEST, a/k/a "Kay Backends," and MILAN WRIGHT, a/k/a "BabyyThreat," the defendants, and others known and unknown, were members and associates of the MacBallers, including one of its affiliated sets, the Backends. The MacBallers were a criminal organization whose members and associates engaged in, among other things, acts involving murder, robbery, and the distribution of controlled substances. The MacBallers operated in the Bronx, New York, and elsewhere.

2. The MacBallers, including its leaders, members, and associates, constituted an "enterprise," as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact, although not a legal entity, that engaged in, and the activities of which affected, interstate and foreign commerce (the "MacBallers" or the "Enterprise"). The

Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise.

3. JAHRID DAWKINS, KADIN WEST, a/k/a "Kay Backends," and MILAN WRIGHT, a/k/a "BabyThreat," the defendants, were members and associates of the Enterprise who participated in unlawful and other activities in furtherance of the conduct of the Enterprise's affairs.

PURPOSES OF THE ENTERPRISE

4. The purposes of the Enterprise included the following:

- a. Preserving and protecting the power of the MacBallers and its members and associates through acts and threats of violence, including acts involving murder and assault.
- b. Keeping victims and potential victims in fear of the MacBallers and its members and associates through acts and threats of violence.
- c. Enriching members and associates of the MacBallers through, among other things, robberies and the distribution of controlled substances, including oxycodone and marihuana.
- d. Promoting and enhancing the MacBallers and the reputation and activities of its members and associates.

MEANS AND METHODS OF THE ENTERPRISE

5. Among the means and methods by which members and associates of the MacBallers conducted and participated in the conduct of the affairs of the Enterprise were the following:

- a. Members and associates of the MacBallers committed, conspired to commit, and attempted to commit acts of violence, including acts involving murder and assault, to protect and expand the criminal operations of the Enterprise, to resolve disputes within the

Enterprise, to retaliate against perceived disrespect to members and associates of the Enterprise, and in connection with rivalries with members of other street gangs and individuals adverse to the Enterprise.

- b. Members and associates of the MacBallers committed robberies.
- c. Members and associates of the MacBallers sold controlled substances, including oxycodone and marihuana.
- d. Members and associates of the MacBallers obtained, possessed, used, and shared firearms and ammunition.
- e. Members and associates of the MacBallers promoted and celebrated certain criminal activities of the MacBallers, including in music and on social media.

THE RACKETEERING CONSPIRACY

6. From at least in or about 2023 through at least in or about May 2026, in the Southern District of New York and elsewhere, JAHRID DAWKINS, KADIN WEST, a/k/a “Kay Backends,” and MILAN WRIGHT, a/k/a “BabyThreat,” the defendants, and others known and unknown, being persons employed by and associated with the MacBallers, an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, knowingly combined, conspired, confederated, and agreed together and with each other to violate the racketeering laws of the United States, to wit, Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the Enterprise through a pattern of racketeering activity, as defined in Title 18, United States Code, Section 1961(1) and (5), which pattern of racketeering consisted of:

- a. multiple acts involving murder, chargeable under the following provisions of state law: New York Penal Law, Sections 125.25 (murder), 105.15 (conspiracy), 110.00 (attempt), and 20.00 (aiding and abetting);

b. multiple acts involving robbery, chargeable under the following provisions of state law: New York Penal Law, Sections 160.00 and 160.05 (robbery), 105.10 (conspiracy), 110.00 (attempt), and 20.00 (aiding and abetting); and

c. multiple offenses involving the distribution of controlled substances, including oxycodone and marihuana, in violation of Title 21, United States Code, Sections 841 (distribution and possession with intent to distribute) and 846 (conspiracy), and Title 18, United States Code, Section 2 (aiding and abetting, and willfully causing).

7. It was a part of the conspiracy that JAHRID DAWKINS, KADIN WEST, a/k/a “Kay Backends,” and MILAN WRIGHT, a/k/a “BabyThreat,” the defendants, each agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the Enterprise.

NOTICE OF SPECIAL SENTENCING FACTOR

8. On or about August 7, 2025, in the Southern District of New York and elsewhere, as part of their agreement to conduct and participate in the conduct of the affairs of the Enterprise through a pattern of racketeering activity, JAHRID DAWKINS and KADIN WEST, a/k/a “Kay Backends,” the defendants, murdered Ralph Herrera, a/k/a “Chicken,” and aided and abetted the same, in the vicinity of Westchester and Morrison Avenues in the Bronx, New York, in violation of New York Penal Law, Section 125.25(1) and 20.00, in that, with intent to cause the death of another person, DAWKINS and WEST caused the death of Herrera by shooting him in the head with a firearm, and aided and abetted the same.

(Title 18, United States Code, Section 1962(d).)

COUNT TWO
(Conspiracy To Commit Murder in Aid of Racketeering)

The Grand Jury further charges:

9. At all times relevant to this Indictment, the MacBallers, as described in paragraphs 1 through 5 of Count One of this Indictment, which are repeated and incorporated by reference as though fully set forth herein, including its leaders, members, and associates, constituted an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact that engaged in, and the activities of which affected, interstate and foreign commerce. The Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise.

10. The Enterprise, through its leaders, members, and associates, engaged in racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1959(b)(1), namely:

a. multiple acts involving murder, chargeable under the following provisions of state law: New York Penal Law, Sections 125.25 (murder), 105.15 (conspiracy), 110.00 (attempt), and 20.00 (aiding and abetting);

b. multiple acts involving robbery, chargeable under the following provisions of state law: New York Penal Law, Sections 160.00, 160.05 (robbery), 105.10 (conspiracy), 110.00 (attempt), and 20.00 (aiding and abetting); and

c. multiple offenses involving the distribution of controlled substances, including oxycodone and marihuana, in violation of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute) and 846 (conspiracy), and Title 18, United States Code, Section 2 (aiding and abetting, and willfully causing).

11. In or around August 2025, in the Southern District of New York and elsewhere, KADIN WEST, a/k/a “Kay Backends,” and MILAN WRIGHT, a/k/a “BabyThreat,” the defendants, and others known and unknown, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the MacBallers, and for the purpose of gaining entrance to and maintaining and increasing position in the MacBallers, an enterprise engaged in racketeering activity, knowingly combined, conspired, confederated, and agreed to murder Ralph Herrera, a/k/a “Chicken,” in violation of New York Penal Law, Sections 125.25(1) and 105.15.

(Title 18, United States Code, Section 1959(a)(5).)

COUNT THREE
(Murder in Aid of Racketeering)

The Grand Jury further charges:

12. At all times relevant to this Indictment, the MacBallers, as described in paragraphs 1 through 5 of Count One of this Indictment, which are repeated and incorporated by reference as though fully set forth herein, including its leaders, members, and associates, constituted an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact that engaged in, and the activities of which affected, interstate and foreign commerce. The Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise.

13. The Enterprise, through its members and associates, engaged in racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1959(b)(1), namely:

a. multiple acts involving murder, chargeable under the following provisions of state law: New York Penal Law, Sections 125.25 (murder), 105.15 (conspiracy), 110.00 (attempt), and 20.00 (aiding and abetting);

b. multiple acts involving robbery, chargeable under the following provisions of state law: New York Penal Law, Sections 160.00, 160.05 (robbery), 105.10 (conspiracy), 110.00 (attempt), and 20.00 (aiding and abetting); and

c. multiple offenses involving the distribution of controlled substances, including oxycodone and marihuana, in violation of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute) and 846 (conspiracy), and Title 18, United States Code, Section 2 (aiding and abetting, and willfully causing).

14. On or about August 7, 2025, in the Southern District of New York and elsewhere, KADIN WEST, a/k/a “Kay Backends,” the defendant, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the MacBallers, and for the purpose of gaining entrance to and maintaining and increasing position in the MacBallers, an enterprise engaged in racketeering activity, intentionally murdered and aided and abetted the murder of Ralph Herrera, a/k/a “Chicken,” in violation of New York Penal Law, Sections 125.25(1) and 20.00, to wit, WEST aided and abetted Jahrid Dawkins, an Enterprise member, in the murder of Herrera, whom Dawkins shot in the head with a firearm and killed in the vicinity of Westchester and Morrison Avenues in the Bronx, New York.

(Title 18, United States Code, Sections 1959(a)(1) and 2.)

SPECIAL FINDINGS AS TO KADIN WEST, A/K/A "KAY BACKENDS"

15. Count Three of this Indictment is realleged and incorporated by reference as though fully set forth herein. As to Count Three of the Indictment, alleging the murder of Ralph Herrera, a/k/a "Chicken, KADIN WEST, a/k/a "Kay Backends," the defendant:

- a. was 18 years of age or older at the time of the offense;
- b. intentionally participated in an act, contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and Ralph Herrera, a/k/a "Chicken," died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C)); and,
- c. intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D)).

(Title 18, United States Code, Section 3591.)

COUNT FOUR
(Firearms Use, Carrying, and Possession)

The Grand Jury further charges:

16. On or about August 7, 2025, in the Southern District of New York and elsewhere, KADIN WEST, a/k/a "Kay Backends," 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 murder in aid of racketeering charged in Count Three of this Indictment, 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 and discharged.

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

FORFEITURE ALLEGATIONS

17. As a result of committing the offense alleged in Count One of this Indictment, JAHRID DAWKINS, KADIN WEST, a/k/a "Kay Backends," and MILAN WRIGHT, a/k/a "BabyyThreat," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1963, any and all interests the defendant acquired or maintained in violation of Title 18, United States Code, Section 1962; any and all interests in, securities of, claims against, and property or contractual rights of any kind affording a source of influence over, the enterprise named and described herein which the defendant established, operated, controlled, conducted, and participated in the conduct of, in violation of Title 18, United States Code, Section 1962; and any and all property constituting and derived from proceeds obtained, directly and indirectly, from the offense alleged in Count One of this Indictment, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

18. As a result of committing the offense alleged in Count Four of this Indictment, KADIN WEST, a/k/a "Kay Backends," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any and all firearms and ammunition involved in or used in said offense.

Substitute Assets Provision

19. If any of the above-described forfeitable property, as a result of any act or omission of JAHRID DAWKINS, KADIN WEST, a/k/a "Kay Backends," and MILAN WRIGHT, a/k/a "BabyyThreat," the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;

- 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 subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 1963(m) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 924 and 1963;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


FOREPERSON


JAY CLAYTON
United States Attorney