UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA v. RAJAHSHUWEH RHODES, a/k/a "Skii Dot," a/k/a "skiidot.b," a/k/a "bdot," Defendant.	**SEALED INDICTMENT** 26 Cr. 474

COUNT ONE
(Racketeering Conspiracy)

The Grand Jury charges:

At all times relevant to this Indictment,

THE BRIMS ENTERPRISE

1. RAJAHSHUWEH RHODES, a/k/a "Skii Dot," a/k/a "skiidot.b," a/k/a "bdot," the defendant, and others known and unknown, were members and associates of the New York Blood Brim Army, an organization within the nationwide gang of the Bloods that operated principally in New York City, including New York, New York, but also elsewhere in the United States of America. Members and associates of the New York Blood Brim Army, including two of its subsets, the 59 Brims and the Bloodhound Brims, engaged in, among other activities, acts involving murder and robbery, access device fraud, wire fraud, mail fraud, bank fraud, and controlled substances trafficking.

2. The New York Blood Brim Army, 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 that engaged in, and the activities of which affected, interstate and foreign commerce (the "Brims" or the "Brims Enterprise"). The Brims constituted

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

3. RAJAHSHUWEH RHODES, a/k/a "Skii Dot," a/k/a "skiidot.b," a/k/a "bdot," the defendant, was a member and associate of the Brims and participated in unlawful and other activities in furtherance of the conduct of the affairs of the Brims.

PURPOSES OF THE BRIMS ENTERPRISE

4. The purposes of the Brims included the following:

a. Preserving and protecting the power and territory of the Brims through acts and threats of violence.

b. Promoting and enhancing the Brims and the reputation and activities of its members and associates.

c. Keeping victims and potential victims in fear of the Brims and its members and associates through acts and threats of violence.

d. Enriching members and associates of the Brims through, among other things, robbery, access device fraud, wire fraud, mail fraud, bank fraud, and the distribution of controlled substances, including marihuana.

e. Assisting members and associates of the Brims who committed crimes for and on behalf of the Brims, including members and associates who were imprisoned for those crimes.

MEANS AND METHODS OF THE BRIMS ENTERPRISE

5. Among the means and methods by which members and associates of the Brims conducted and participated in the conduct of the affairs of the Brims included the following:

a. Members and associates of the Brims committed, conspired, attempted, and threatened to commit acts of violence, including acts involving murder and assault, to protect and expand the criminal operations, power, and territory of the Brims, to resolve disputes within the Brims, and to challenge and retaliate against members of rival gangs and other individuals.

b. Members and associates of the Brims committed robberies of both commercial establishments, including illegal gambling locations and smoke shops, and individuals, including street robberies and home-invasion robberies.

c. Members and associates of the Brims obtained, possessed, transported, and used firearms.

d. Members and associates of the Brims committed access device fraud, wire fraud, mail fraud, and bank fraud, including through schemes involving the fraudulent use of credit cards, the fraudulent staging of car accidents involving stolen cars and faked injuries, the fraudulent deposit of stolen checks, and the fraudulent diversion of public welfare funds, in order to enrich the Brims and members and associates of the Brims.

e. Members and associates of the Brims dealt in controlled substances, including marihuana.

f. Members and associates of the Brims promoted and celebrated certain criminal activity of the Brims, including acts of violence, including through social media.

THE RACKETEERING CONSPIRACY

6. From at least in or about 2019 through at least in or about 2026, in the Southern District of New York and elsewhere, RAJAHSHUWEH RHODES, a/k/a "Skii Dot," a/k/a "skiidot.b," a/k/a "bdot," the defendant, and others known and unknown. being persons employed by and associated with the Brims, 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 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 Brims Enterprise through a pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and 1961(5), which pattern of racketeering activity consisted of:

a. multiple acts involving murder, chargeable under the following provisions of state law: New York Penal Law, Sections 125.25 (murder), 110.00 (attempt), 105.15 (conspiracy), 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, 160.10 (robbery), 105.10 (conspiracy), 110.00 (attempt), and 20.00 (aiding and abetting);

c. multiple acts indictable under Title 18, United States Code,

i. Sections 1951 and 2 (relating to interference with commerce, robbery, or extortion);

ii. Sections 1029 and 2 (relating to fraud and related activity in connection with access devices);

iii. Sections 1343 and 2 (relating to wire fraud);

iv. Sections 1341 and 2 (relating to mail fraud): and

v. Sections 1344 and 2 (relating to financial institution fraud); and

d. multiple offenses involving the distribution of controlled substances, including marihuana, in violation of laws of the United States, to wit, Title 21, United States Code, Sections 812, 841(a)(1), 841(b)(1)(C), 841(b)(1)(D), and 846, and Title 18, United States Code, Section 2.

7. It was a part of the conspiracy that RAJAHSHUWEH RHODES, a/k/a "Skii Dot," a/k/a "skiidot.b," a/k/a "bdot," the defendant, agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the Brims Enterprise.

NOTICE OF SPECIAL SENTENCING FACTORS

8. As part of his agreement to conduct and participate in the conduct of the affairs of the Brims Enterprise through a pattern of racketeering activity, RAJAHSHUWEH RHODES, a/k/a "Skii Dot," a/k/a "skiidot.b," a/k/a "bdot," the defendant, committed the following act: on or about October 15, 2021, in the Southern District of New York and elsewhere, RHODES murdered Isaiah Levine, and aided and abetted the same, in the vicinity of Delancy Street and Suffolk Street in New York, New York, in that, (i) with intent to cause the death of another person, to wit, Isaiah Levine, RHODES caused Isaiah Levine's death, and aided and abetted the same, in violation of New York Penal Law, Sections 125.25(1) and 20.00; and (ii) under circumstances evincing a depraved indifference to human life, RHODES recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused the death of another person, to wit, Isaiah Levine, and aided and abetted the same, in violation of New York Penal Law, Sections 125.25(2) and 20.00.

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

COUNT TWO
(Murder in Aid of Racketeering – Isaiah Levine)

The Grand Jury further charges:

9. At all times relevant to this Indictment, the Brims, 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 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 Brims constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Brims Enterprise.

10. The Brims Enterprise, through its members and associates, engaged in racketeering activity, as 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), 110.00 (attempt), 105.15 (conspiracy), 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, 160.10 (robbery), 105.10 (conspiracy), 110.00 (attempt), and 20.00 (aiding and abetting);

c. multiple acts indictable under Title 18, United States Code,

i. Sections 1951 and 2 (relating to interference with commerce, robbery, or extortion);

ii. Sections 1029 and 2(relating to fraud and related activity in connection with access devices);

iii. Sections 1343 and 2 (relating to wire fraud);

iv. Sections 1341 and 2 (relating to mail fraud); and

v. Sections 1344 and 2 (relating to financial institution fraud); and

d. multiple offenses involving the distribution of controlled substances, including marihuana, in violation of laws of the United States, to wit, Title 21, United States Code, Sections 812, 841(a)(1), 841(b)(1)(C), 841(b)(1)(D), and 846, and Title 18, United States Code, Section 2.

11. On or about October 15, 2021, in the Southern District of New York and elsewhere, RAJAHSHUWEH RHODES, a/k/a "Skii Dot," a/k/a "skiidot.b," a/k/a "bdot," the defendant, and others known and unknown, for the purpose of gaining entrance to and maintaining and increasing position in the Brims, an enterprise engaged in racketeering activity, knowingly murdered and aided and abetted the murder of Isaiah Levine in the vicinity of Delancy Street and Suffolk Street in New York, New York, in violation of New York Penal Law, Sections 125.25(1) and (2) and 20.00, in that, (i) with intent to cause the death of another person, to wit, Isaiah Levine, RHODES caused Isaiah Levine's death, and aided and abetted the same, in violation of New York Penal Law, Sections 125.25(1) and 20.00; and (ii) under circumstances evincing a depraved indifference to human life, RHODES recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused the death of another person, to wit, Isaiah Levine, and aided and abetted the same, in violation of New York Penal Law, Sections 125.25(2) and 20.00.

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

COUNT THREE
(Firearm Use, Carrying, and Possession)

The Grand Jury further charges:

12. On or about October 15, 2021, in the Southern District of New York and elsewhere, RAJAHSHUWEH RHODES, a/k/a "Skii Dot," a/k/a "skiidot.b," a/k/a "bdot," 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 predicated upon a violation of New York Penal Law, Sections 125.25(1) and 20.00 and charged in Count Two of this Indictment, knowingly used and carried a firearm, and in furtherance of such crime, possessed a firearm, which was brandished and discharged, and aided and abetted the same.

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

COUNT FOUR
(Attempted Murder and Assault with a Dangerous Weapon in Aid of Racketeering – Victim-1)

The Grand Jury further charges:

13. At all times relevant to this Indictment, the Brims, 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 leadership, members, and associates, constituted an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association in fact of individuals which is engaged in, and the activities of which affected, interstate and foreign commerce. The Brims constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Brims.

14. At all times relevant to this Indictment, the Brims 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), 110.00 (attempt), 105.15 (conspiracy), 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, 160.10 (robbery), 105.10 (conspiracy), 110.00 (attempt), and 20.00 (aiding and abetting);

c. multiple acts indictable under Title 18, United States Code,

i. Sections 1951 and 2 (relating to interference with commerce, robbery, or extortion);

ii. Sections 1029 and 2 (relating to fraud and related activity in connection with access devices);

iii. Sections 1343 and 2 (relating to wire fraud);

iv. Sections 1341 and 2 (relating to mail fraud); and

v. Sections 1344 and 2 (relating to financial institution fraud); and

d. multiple offenses involving the distribution of controlled substances, including marihuana, in violation of laws of the United States, to wit, Title 21, United States Code, Sections 812, 841(a)(1), 841(b)(1)(C), 841(b)(1)(D), and 846, and Title 18, United States Code, Section 2.

15. On or about October 15, 2021, in the Southern District of New York and elsewhere, RAJAHSHUWEH RHODES, a/k/a "Skii Dot," a/k/a "skiidot.b," a/k/a "bdot," the defendant, and others known and unknown, for the purpose of gaining entrance to and maintaining and increasing position in the Brims, an enterprise engaged in racketeering activity, knowingly attempted to murder an individual and assaulted an individual with a dangerous weapon, and aided and abetted the same, to wit, RHODES shot an individual ("Victim-1") in the vicinity of Delancy Street and

Suffolk Street in New York, New York, striking Victim-1's leg, in violation of New York Penal Law, Sections 120.05(2), 120.14(1), 125.25(1), 110.00, and 20.00.

(Title 18, United States Code, Sections 1959(a)(3), (a)(5), and 2.)

COUNT FIVE
(Firearm Use, Carrying, and Possession)

The Grand Jury further charges:

16. On or about October 15, 2021, in the Southern District of New York and elsewhere, RAJAHSHUWEH RHODES, a/k/a "Skii Dot," a/k/a "skiidot.b," a/k/a "bdot," 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 Attempted Murder in Aid of Racketeering and Assault with a Dangerous Weapon in Aid of Racketeering charged in Count Four of this Indictment, knowingly used and carried a firearm, and in furtherance of such crime, possessed a firearm, which was brandished and discharged, and aided and abetted the same.

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

COUNT SIX
(Conspiracy to Distribute Controlled Substances)

The Grand Jury further charges:

17. From at least in or about 2021 through at least in or about 2024, in the Southern District of New York and elsewhere, RAJAHSHUWEH RHODES, a/k/a "Skii Dot," a/k/a "skiidot.b," a/k/a "bdot," the defendant, and others known and unknown, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to violate the controlled-substance laws of the United States.

18. It was a part and an object of the conspiracy that RAJAHSHUWEH RHODES, the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

19. The controlled substance involved in the offense was less than 50 kilograms of marihuana, in violation of Title 21, United States Code, Section 841(b)(1)(D).

(Title 21, United States Code, Section 846.)

COUNT SEVEN
(Firearm Use, Carrying, and Possession)

The Grand Jury further charges:

20. From at least on or about 2021 through at least in or about 2024, in the Southern District of New York and elsewhere, RAJAHSHUWEH RHODES, a/k/a "Skii Dot," a/k/a "skiidot.b," a/k/a "bdot," the defendant, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the drug trafficking crime charged in Count Six of this Indictment, knowingly used and carried firearms, and in furtherance of such crime, possessed firearms, and aided and abetted the same.

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

SPECIAL FINDINGS REGARDING THE MURDER OF ISAIAH LEVINE

21. Count Two of this Indictment is re-alleged and incorporated by reference as though fully set forth herein. As to Count Two, alleging the murder of Isaiah Levine on or about October 15, 2021, RAJAHSHUWEH RHODES, a/k/a "Skii Dot," a/k/a "skiidot.b," a/k/a "bdot," the defendant:

a. was 18 years of age and older at the time of the offense;

b. intentionally killed Isaiah Levine (Title 18, United States Code, Section 3591(a)(2)(A));

c. intentionally inflicted serious bodily injury that resulted in the death of Isaiah Levine (Title 18, United States Code, Section 3591(a)(2)(B));

d. intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and Isaiah Levine died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C));

e. 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 Isaiah Levine died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D));

f. in the commission of the offense knowingly created a grave risk of death to one and more persons in addition to the victim of the offense (Title 18, United States Code, Section 3592(c)(5)); and

g. committed the offense after substantial planning and premeditation to cause the death of Isaiah Levine (Title 18, United States Code, Section 3592(c)(9)).

(Title 18, United States Code, Sections 3591 and 3592.)

FORFEITURE ALLEGATIONS

22. As a result of committing the offense alleged in Count One of this Indictment, RAJAHSHUWEH RHODES, a/k/a "Skii Dot," a/k/a "skiidot.b," a/k/a "bdot," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1963, any and all interests the defendants 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 defendants 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.

23. As a result of committing the offenses alleged in Counts Three, Five, and Seven of this Indictment, RAJAHSHUWEH RHODES, 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 offenses.

24. As a result of committing the offense alleged in Count Six of this Indictment, RAJAHSHUWEH RHODES, the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, 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.

Substitute Assets Provision

25. If any of the above-described forfeitable property, as a result of any act or omission of RAJAHSHUWEH RHODES, a/k/a "Skii Dot," a/k/a "skiidot.b," a/k/a "bdot," the defendant:

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

[redacted]
FOREPERSON
10/8/2026

James M. McDonald
JAMES M. MCDONALD
United States Attorney