

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
UNITED STATES OF AMERICA :

- v. - :

ARDAE HINES, :
a/k/a "Young Money," :
a/k/a "YM," :

Defendant. :

SEALED INDICTMENT

22 Cr. 42

----- X
COUNT ONE

(Murder in Aid of Racketeering)

The Grand Jury charges:

The Enterprise

1. At all times relevant to this Indictment, ARDAE HINES, a/k/a "Young Money," a/k/a "YM," the defendant, and others known and unknown, were members and associates of the Southside Gang, ("Southside" or the "Enterprise"), a criminal organization whose members and associates engaged in, among other activities, narcotics trafficking, robbery, and acts involving murder. Southside operated principally in and around the City of Newburgh, New York.

2. At all times relevant to this Indictment, Southside, 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,

although not a legal entity, 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.

3. At all times relevant to this Indictment, the above-described Enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, acts involving murder and robbery in violation of the laws of New York State, and offenses involving drug trafficking in violation of Title 21, United States Code, Sections 812, 841, and 846.

4. Members and associates of Southside sold heroin and cocaine base, commonly known as "crack cocaine," and marijuana in and around the intersection of South Street and Chambers Street, in an area commonly referred to as "the Southside" of the City of Newburgh, New York. Southside controlled heroin, crack cocaine, and marijuana sales within this area by prohibiting and preventing non-members, outsiders, and rival narcotics dealers from travelling to or distributing drugs in the area controlled by the Enterprise.

5. Certain members and associates of Southside committed and agreed, attempted, and threatened to commit acts of violence to protect and expand their drug trafficking operation and to

protect fellow members and associates of the Enterprise. These included acts involving murder and assault, intended to protect the Enterprise's drug territory, enforce discipline amongst members of Southside, and to otherwise promote the standing and reputation of Southside.

Purposes of the Enterprise

6. The purposes of the Enterprise included the following:
 - a. Preserving and protecting the power, territory, and profits of the Enterprise through acts involving murder, assault, robbery, and other acts of violence and threats of violence.
 - b. Promoting and enhancing the Enterprise and the activities of its members and associates.
 - c. Keeping victims and potential victims in fear of the Enterprise and its members and associates through acts and threats of violence.
 - d. Providing assistance to members and associates who committed crimes for and on behalf of the gang.
 - e. Enriching the members and associates of the Enterprise through, among other things, robberies, and the distribution and sale of narcotics, including heroin, crack cocaine, and marijuana.
 - f. Protecting the Enterprise and its members and associates from detection and prosecution by law enforcement.

authorities through acts of intimidation and violence against potential witnesses to crimes committed by members of the Enterprise.

Means and Methods of the Enterprise

7. Among the means and methods employed by the members and associates in conducting and participating in the conduct of the affairs of the Enterprise were the following:

a. Members and associates of the Enterprise committed, conspired, attempted, and threatened to commit acts involving murder, assault, robbery, and other acts of violence and threats of violence against rival gang members and other individuals adverse to the Enterprise, to maintain their positions in and to advance their positions in the Enterprise, and in connection with rivalries with members of other gangs.

b. Members and associates of the Enterprise promoted and celebrated the criminal conduct of the Enterprise, namely the narcotics distribution, acts involving violence, and firearm usage, on social media websites such as Facebook.

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

d. Members and associates of the Enterprise distributed controlled substances, including heroin, crack cocaine, and marijuana.

e. Members and associates of the Enterprise

committed acts of intimidation and made threats as a means of deterring and punishing any potential witnesses to their crimes and in connection with protecting the Enterprise and its members and associates from detection and prosecution by law enforcement authorities.

8. On or about August 1, 2016, in the Southern District of New York, ARDAE HINES, a/k/a "Young Money," a/k/a "YM," the defendant, 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 Southside, and for the purpose of gaining entrance to and maintaining and increasing position in Southside, an enterprise engaged in racketeering activity, as described above, knowingly murdered and aided and abetted the murder of Deandric Little, a/k/a "Moolah," in the vicinity of the intersection of South Street and Chambers Street in the City of Newburgh, New York, in violation of New York Penal Law, Sections 125.25 and 20.00, in that, (1) with the intent to cause the death of Deandric Little, HINES caused the death of Little; and (2) under circumstances evincing a depraved indifference to human life, HINES did recklessly engage in conduct which created a grave risk of death to another person, and thereby caused the death of Little, to wit, after engaging in an altercation with Little, HINES instructed his co-conspirator to shoot Little, and in the course of and in

furtherance of that shooting caused the death of Deandric Little.

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

COUNT TWO
(Murder in Connection with a Drug Crime)

The Grand Jury further charges:

9. On or about August 1, 2016, in the Southern District of New York, while engaged in an offense punishable under Section 841(b)(1)(A) of Title 21, United States Code, namely, a conspiracy to distribute and possess with the intent to distribute controlled substances, to wit, 280 grams and more of crack cocaine and 1 kilogram and more of heroin, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 846, ARDAE HINES, a/k/a "Young Money," a/k/a "YM," the defendant, and others known and unknown, intentionally and knowingly killed and counseled, commanded, induced, procured, and caused the intentional killing of Deandric Little, in the vicinity of the intersection of South Street and Chambers Street in the City of Newburgh.

(Title 21, United States Code, Section 848(e)(1)(A); Title 18, United States Code, Section 2.)

COUNT THREE
(Firearms Offense)

The Grand Jury further charges:

10. On or about August 1, 2016, in the Southern District of New York, ARDAE HINES, a/k/a "Young Money," a/k/a "YM," the defendant, and others known and unknown, willfully and knowingly, 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 One of this Indictment, and the murder in connection with a drug crime charged in Count Two of this Indictment, did use and carry firearms, and did aid and abet the use and carry of firearms, and, in furtherance of such offense, did possess firearms and aid and abet the possession of firearms, and in the course of that offense did, through the use of a firearm, cause the death of a person, which killing is murder as defined in Title 18, United States Code, Section 1111(a), and did aid and abet the

same, to wit, HINES instructed a co-conspirator to shoot and kill Deandric Little, which caused Little's death.

(Title 18, United States Code, Sections 924(j) and 2.)



FOREPERSON

Handwritten signature of Damian Williams in cursive script.

DAMIAN WILLIAMS
United States Attorney

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Defendant.

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(18 U.S.C. §§ 1959, 924(j), and 2; 21
U.S.C. § 848.)

 DAMIAN WILLIAMS
Foreperson United States Attorney.
