

EAG:JRS/TH  
F. #2019R01680

**FILED 5/18/2022**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
-----X

UNITED STATES OF AMERICA

- against -

SOMORIE MOSES,  
also known as "Somorie Barfield,"  
"Sugar Bear," "Bear" and "Daddy,"

Defendant.

-----X

THE GRAND JURY CHARGES:

I N D I C T M E N T

1:22-cr-00232(CBA)(SJB)

Cr. No. \_\_\_\_\_  
(T. 18, U.S.C., §§ 1591(a)(1), 1591(b)(1),  
1591(b)(2), 1594(d), 2245 and 3551 et  
seq.; T. 21, U.S.C., § 853(p))

COUNT ONE

(Sex Trafficking – Jane Doe 1)

1. On or about and between September 1, 2003 and December 7, 2003, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant SOMORIE MOSES, also known as "Somorie Barfield," "Sugar Bear," "Bear" and "Daddy," did knowingly and intentionally recruit, entice, harbor, transport, provide and obtain by any means a person, to wit: Jane Doe 1, an individual whose identity is known to the Grand Jury, in and affecting interstate commerce, knowing that force, fraud and coercion, as described in Title 18, United States Code, Section 1591(e)(2), would be used to cause Jane Doe 1 to engage in one or more commercial sex acts, which offense was effected by force, fraud and coercion.

(Title 18, United States Code, Sections 1591(a)(1), 1591(b)(1) and 3551 et seq.)

COUNT TWO  
(Sex Trafficking – Jane Doe 2)

2. On or about and between December 19, 2003 and April 30, 2006, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant SOMORIE MOSES, also known as “Somorie Barfield,” “Sugar Bear,” “Bear” and “Daddy,” did knowingly and intentionally recruit, entice, harbor, transport, provide and obtain by any means a person, to wit: Jane Doe 2, an individual whose identity is known to the Grand Jury, in and affecting interstate and foreign commerce, knowing that (1) force, fraud and coercion, as described in Title 18, United States Code, Section 1591(e)(2), would be used to cause Jane Doe 2 to engage in one or more commercial sex acts, and (2) Jane Doe 2 had not attained the age of 18 years and would be caused to engage in one or more commercial sex acts, which offense was effected by force, fraud and coercion.

(Title 18, United States Code, Sections 1591(a)(1), 1591(b)(1), 1591(b)(2) and  
3551 et seq.)

COUNT THREE  
(Sex Trafficking – Jane Doe 3)

3. In or about and between January 2005 and January 2006, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant SOMORIE MOSES, also known as “Somorie Barfield,” “Sugar Bear,” “Bear” and “Daddy,” did knowingly and intentionally recruit, entice, harbor, transport, provide and obtain by any means a person, to wit: Jane Doe 3, an individual whose identity is known to the Grand Jury, in and affecting interstate and foreign commerce, knowing that force, fraud and coercion, as described

in Title 18, United States Code, Section 1591(e)(2), would be used to cause Jane Doe 3 to engage in one or more commercial sex acts, which offense was effected by force, fraud and coercion.

(Title 18, United States Code, Sections 1591(a)(1), 1591(b)(1) and 3551 et seq.)

COUNT FOUR

(Sex Trafficking – Jane Doe 4)

4. On or about and between June 1, 2006 and July 26, 2006, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant SOMORIE MOSES, also known as “Somorie Barfield,” “Sugar Bear,” “Bear” and “Daddy,” did knowingly and intentionally recruit, entice, harbor, transport, provide and obtain by any means a person, to wit: Jane Doe 4, an individual whose identity is known to the Grand Jury, in and affecting interstate and foreign commerce, knowing that (1) force, fraud and coercion, as described in Title 18, United States Code, Section 1591(e)(2), would be used to cause Jane Doe 4 to engage in one or more commercial sex acts, and (2) Jane Doe 4 had not attained the age of 18 years and would be caused to engage in one or more commercial sex acts, which offense was effected by force, fraud and coercion.

(Title 18, United States Code, Sections 1591(a)(1), 1591(b)(1), 1591(b)(2) and 3551 et seq.)

COUNT FIVE

(Sex Trafficking – Jane Doe 5)

5. On or about and between July 27, 2006 and November 30, 2006, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant SOMORIE MOSES, also known as “Somorie Barfield,” “Sugar Bear,” “Bear” and “Daddy,” did knowingly and intentionally recruit, entice, harbor, transport, provide and obtain by any means a person, to wit: Jane Doe 5, an individual whose identity is known to the Grand

Jury, in and affecting interstate and foreign commerce, knowing that force, fraud and coercion, as described in Title 18, United States Code, Section 1591(e)(2), would be used to cause Jane Doe 5 to engage in one or more commercial sex acts, which offense was effected by force, fraud and coercion.

(Title 18, United States Code, Sections 1591(a)(1), 1591(b)(1) and 3551 et seq.)

COUNT SIX  
(Sex Trafficking – Jane Doe 2)

6. On or about July 15, 2010, within the Eastern District of New York and elsewhere, the defendant SOMORIE MOSES, also known as “Somorie Barfield,” “Sugar Bear,” “Bear” and “Daddy,” did knowingly and intentionally recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, to wit: Jane Doe 2, in and affecting interstate and foreign commerce, knowing and in reckless disregard of the fact that means of force, threats of force, fraud and coercion, as described in Title 18, United States Code, Section 1591(e)(2), and a combination of such means would be used to cause Jane Doe 2 to engage in one or more commercial sex acts, which offense was effected by means of force, threats of force, fraud and coercion, and a combination of such means.

(Title 18, United States Code, Sections 1591(a)(1), 1591(b)(1) and 3551 et seq.)

COUNT SEVEN  
(Sex Trafficking – Jane Doe 6)

7. In or about 2011, within the Eastern District of New York and elsewhere, the defendant SOMORIE MOSES, also known as “Somorie Barfield,” “Sugar Bear,” “Bear” and “Daddy,” did knowingly and intentionally recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, to wit: Jane Doe 6, an individual whose identity is known to the Grand Jury, in and affecting interstate and foreign commerce, knowing and in reckless disregard



of the fact that means of force, threats of force, fraud and coercion, as described in Title 18, United States Code, Section 1591(e)(2), and a combination of such means would be used to cause Jane Doe 6 to engage in one or more commercial sex acts, which offense was effected by means of force, threats of force, fraud and coercion, and a combination of such means.

(Title 18, United States Code, Sections 1591(a)(1), 1591(b)(1) and 3551 et seq.)

COUNT EIGHT  
(Sex Trafficking – Jane Doe 7)

8. On or about and between August 1, 2011 and January 11, 2012, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant SOMORIE MOSES, also known as “Somorie Barfield,” “Sugar Bear,” “Bear” and “Daddy,” did knowingly and intentionally recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, to wit: Jane Doe 7, an individual whose identity is known to the Grand Jury, in and affecting interstate and foreign commerce, knowing and in reckless disregard of the fact that means of force, threats of force, fraud and coercion, as described in Title 18, United States Code, Section 1591(e)(2), and a combination of such means would be used to cause Jane Doe 7 to engage in one or more commercial sex acts, which offense was effected by means of force, threats of force, fraud and coercion, and a combination of such means.

(Title 18, United States Code, Sections 1591(a)(1), 1591(b)(1) and 3551 et seq.)

COUNT NINE  
(Sex Trafficking – Leondra Foster)

9. On or about and between March 1, 2016 and January 13, 2017, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant SOMORIE MOSES, also known as “Somorie Barfield,” “Sugar Bear,” “Bear” and “Daddy,” did knowingly and intentionally recruit, entice, harbor, transport, provide, obtain and

maintain by any means a person, to wit: Leondra Foster, in and affecting interstate and foreign commerce, knowing and in reckless disregard of the fact that means of force, threats of force, fraud and coercion, as described in Title 18, United States Code, Section 1591(e)(2), and a combination of such means would be used to cause Foster to engage in one or more commercial sex acts, which offense was effected by means of force, threats of force, fraud and coercion, and a combination of such means.

(Title 18, United States Code, Sections 1591(a)(1), 1591(b)(1) and 3551 et seq.)

COUNT TEN

(Murder of Leondra Foster in the Course of Sex Trafficking)

10. On or about and between January 12, 2017 and January 13, 2017, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant SOMORIE MOSES, also known as “Somorie Barfield,” “Sugar Bear,” “Bear” and “Daddy,” in the course of a violation of Title 18, United States Code, Section 1591, to wit: the crime charged in Count Nine, did knowingly and intentionally murder an individual, in that the defendant, with malice aforethought, did unlawfully kill Leondra Foster.

(Title 18, United States Code, Sections 2245 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION  
AS TO COUNTS ONE THROUGH NINE

11. The United States hereby gives notice to the defendant that, upon his conviction of any of the offenses charged in Counts One through Nine, the government will seek forfeiture in accordance with Title 18, United States Code, Section 1594(d), of (a) any property, real or personal, that was involved in, used or intended to be used to commit or to facilitate the commission of such offenses, and any property traceable to such property; and (b) any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offenses, or any property traceable to such property.

12. If any of the above-described forfeitable property, 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;

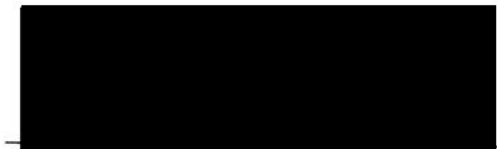
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 1594(d); Title 21, United States Code, Section 853(p))

A TRUE BILL



FOREPERSON



BREON PEACE /  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

F.#: 2019R01680  
FORM DBD-34  
JUN. 85

No.

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**UNITED STATES DISTRICT COURT**

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

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THE UNITED STATES OF AMERICA

vs.

SOMORIE MOSES, ALSO KNOWN AS "SOMORIE BARFIELD,"  
"SUGAR BEAR," "BEAR" AND "DADDY,"

Defendant.

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**INDICTMENT**

(T. 18, U.S.C., §§ 1591(a)(1), 1591(b)(1), 1591(b)(2), 1594(d), 2245 and 3551 et  
seq.; T. 21, U.S.C., § 8 [REDACTED])

[REDACTED]

[REDACTED]

Foreperson

Filed in open court this \_\_\_\_\_ day,

of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

-----  
Clerk

Bail, \$ \_\_\_\_\_

Jonathan Siegel and Tanya Hajjar, Assistant U.S. Attorneys (718) 254-6293/6109