

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA	:	<u>SEALED</u>
	:	<u>INDICTMENT</u>
- v. -	:	
	:	18 Cr. _____
SAEED MALIK THOMAS NORRIS,	:	
a/k/a "Sparks,"	:	
	:	
Defendant.	:	
-----	x	

COUNT ONE

(Conspiracy to Commit Sex Trafficking)

The Grand Jury charges:

1. From in or about July 2016, up to and including in or about August 2016, within the Southern District of New York and elsewhere, SAEED MALIK THOMAS NORRIS, a/k/a "Sparks," the defendant, together with others known and unknown, did willfully and knowingly combine, conspire, confederate, and agree together and with each other to commit sex trafficking, in violation of Title 18, United States Code, Sections 1591(a)(1), (a)(2) and (b).

2. Victims of the defendant's sex trafficking conspiracy included minor girls who resided at a particular non-incarceratory residential treatment facility located in Westchester County, New York ("Facility-1"), which provided housing for at-risk and troubled children and adolescents on

behalf of departments of social services for certain counties in New York State. Other victims of the conspiracy were young women who had reached 18 years of age.

3. It was a part and an object of the conspiracy that SAEED MALIK THOMAS NORRIS, a/k/a "Sparks," the defendant, and others known and unknown, willfully and knowingly, in and affecting interstate and foreign commerce, would and did recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means one and more persons, and did benefit, financially and by receiving things of value, from participation in a venture that engaged in any such act, knowing and in reckless disregard of the fact that one and more such persons had not attained the age of 18 years and would be caused to engage in one and more commercial sex acts, to wit, NORRIS recruited women and minor girls to engage in prostitution at various locations in and around the New York area, including at least four minor victims, who were, at various points, residents of Facility-1.

(Title 18, United States Code, Section 1594(c).)

COUNT TWO

(Sex Trafficking)

The Grand Jury further charges:

4. The allegations in paragraph 2 of this Indictment are repeated and realleged as if fully set forth herein.

5. From in or about July 2016, up to and including in or about August 2016, within the Southern District of New York and elsewhere, SAEED MALIK THOMAS NORRIS, a/k/a "Sparks," the defendant, willfully and knowingly, in and affecting interstate and foreign commerce, did recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means one or more persons, and did benefit, financially and by receiving things of value, from participation in a venture that engaged in any such act, knowing and in reckless disregard of the fact that one or more such persons had not attained the age of 18 years and would be caused to engage in one and more commercial sex acts, to wit, NORRIS recruited a minor victim ("Victim-1"), formerly a resident of Facility-1, and caused Victim-1 to engage in at least one commercial sex act.

(Title 18, United States Code, Sections 1591(a), (b)(2), and 2.)

FORFEITURE ALLEGATIONS

6. As a result of committing the offenses alleged in Counts One through Two of this Indictment, SAEED MALIK THOMAS NORRIS, a/k/a "Sparks," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1594(d), any property, real and personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of the offenses alleged in Counts One through Two, and any property, real and personal, constituting or derived

from, any proceeds obtained, directly or indirectly, as a result of the offenses alleged in Counts One through Two, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses that the defendant personally obtained.

Substitute Asset Provision

7. 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 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 21 U.S.C. § 853(p) and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981, and 1594; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)



FOREPERSON


GEOFFREY S. BERMAN
United States Attorney

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UNITED STATES OF AMERICA

v.

SAEED MALIK THOMAS NORRIS,
a/k/a "Sparks,"

Defendant.

INDICTMENT

18 Cr. _____

(18 U.S.C. §§ 1591(a)(1), (2); (b)(2),
1594(c), and 2)

GEOFFREY S. BERMAN
United States Attorney


Foreperson
