

FILED 02 AUG '23 12:01 USDC-ORP

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
MEDFORD DIVISION**

UNITED STATES OF AMERICA

1:23-cr-00254-MC

v.

INDICTMENT

**NEGASI ZUBERI, aka
JUSTIN JOSHUA HYCHE,**

**18 U.S.C. § 1201(a)(1)
18 U.S.C. § 2421**

Defendant.

Forfeiture Allegation

THE GRAND JURY CHARGES:

**COUNT 1
Kidnapping
(18 U.S.C. § 1201(a)(1))**

On or about July 15, 2023, in the District of Oregon and elsewhere, defendant **NEGASI ZUBERI** did unlawfully and willfully seize, confine, inveigle, decoy, kidnap, abduct, and carry away Adult Victim 1 (AV1), and hold AV1 against AV1's will, and in committing or in furtherance of the commission of the offense, did willfully transport AV1 in interstate commerce from the State of Washington to the State of Oregon;

In violation of Title 18, United States Code, Section 1201(a)(1).

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Indictment

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COUNT 2
Transportation with Intent to Engage in Sexual Activity
(18 U.S.C. § 2421)

On or about July 15, 2023, in the District of Oregon and elsewhere, defendant **NEGASI ZUBERI**, knowingly transported AV1 in interstate commerce from the State of Washington to the State of Oregon with the intent that the defendant engage in unlawful sexual activity for which he can be charged with a criminal offense;

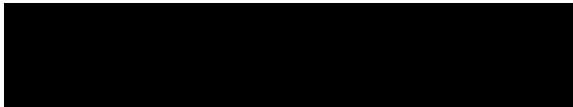
In violation of Title 18, United States Code, Section 2421.

CRIMINAL FORFEITURE ALLEGATION

Upon conviction of the offense in Counts 2 of this Indictment, defendant **NEGASI ZUBERI** shall forfeit to the United States pursuant to 18 U.S.C. § 2428, any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violation, and any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of such violation.

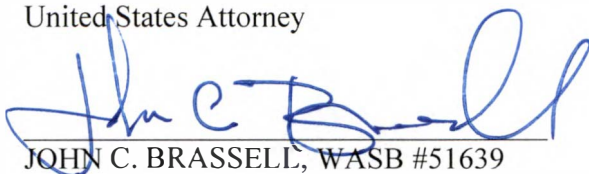
Dated: August 2, 2023

A TRUE BILL.


OFFICIAL UNG FOREPERSON

Presented by:

NATALIE K. WIGHT
United States Attorney



JOHN C. BRASSELL, WASB #51639
Assistant United States Attorney