

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
District of Oregon

United States of America
v.
NEGASI ZUBERI
aka JUSTIN JOSHUA HYCHE

Case No.
1:23-mj - 117-CL

Defendant(s)

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 15, 2023 in the county of Klamath in the
 District of Oregon, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 1201	Interstate Kidnapping

This criminal complaint is based on these facts:

Please see attached Affidavit of FBI Travis Gluesenkamp.

Continued on the attached sheet.

S/Travis Gluesenkamp

Complainant's signature

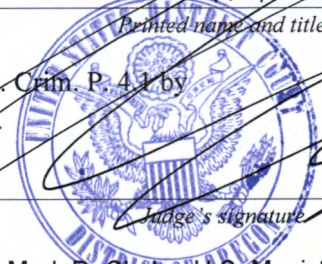
Travis Gluesenkamp, Special Agent, FBI

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
telephone at 3:55 a.m./p.m.

Date: 7/17/23

City and state: Medford, Oregon



Judge's signature

Mark D. Clarke, U.S. Magistrate Judge

Printed name and title

DISTRICT OF OREGON, ss: AFFIDAVIT OF TRAVIS R. GLUESENKAMP

Affidavit in Support of a Criminal Complaint and Arrest Warrant

I, Travis Gluesenkamp, being duly sworn, do hereby depose and state as follows:

Introduction and Agent Background

1. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI) and have been so employed since July of 2008. I am currently assigned to the FBI office in Medford, Oregon. I completed five months training at the FBI Academy in Quantico, Virginia, where I learned the skills necessary to conduct federal criminal investigations, including investigating crime scenes, interviewing witnesses and suspects, and writing reports and affidavits. I have five years of experience working domestic terrorism matters which included investigations into bombings, white powder letters, sovereign citizen extremists, and militia extremists, and I have two years' experience investigating wire fraud, identity theft, and conspiracy crimes. I have three years of experience as an Airport Liaison Agent where I handled all crimes aboard aircraft matters at the Portland International Airport. I investigated and indicted several individuals for sexual assault, sexual assault on a minor, indecent exposure, and interference with flight crew members and other violations of federal law.

2. I submit this affidavit in support of a criminal complaint and arrest warrant for Negasi Zuberi, AKA: Justin Joshua Hyché; Sakima Zuberi; and Justin Kouassi, date of birth XX/XX/1993, (hereinafter Zuberi), for interstate kidnapping, in violation of Title 18, United States Code, Section 1201. As set forth below, there is probable cause to believe, and I do believe, that Zuberi committed interstate kidnapping, in violation of Title 21, United States Code, Section 1201.

Applicable Law

4. Title 18, United States Code, Section 1201 prohibits whoever unlawfully seizes, confines, inveigles, decoys, kidnaps, abducts, or carries away and holds for ransom or reward or otherwise any person and willfully transports in interstate or foreign commerce, or travels in interstate or foreign commerce, or uses the mail or any means, facility, or instrumentality of interstate or foreign commerce in committing or in furtherance of the commission of the offense.

Statement of Probable Cause

5. On July 15, 2023, at approximately 12:01 a.m., Zuberi approached Adult Victim 1 (AV1) in the vicinity of Aurora Avenue in Seattle, Washington, and solicited AV1 to engage in prostitution. At the completion of the sexual encounter, Zuberi claimed to be an undercover police officer and showed AV1 a badge. Zuberi advised AV1 he needed to take AV1 into custody to be processed. Zuberi pointed a black and yellow taser at AV1, placed AV1 in handcuffs and leg irons, and moved her into the back seat of his vehicle. AV1 observed a firearm inside Zuberi's vehicle.

7. Zuberi transported AV1 south on Interstate 5 (I-5) from the State of Washington into the State of Oregon. When AV1 inquired why the trip was taking so long, Zuberi replied he was taking her to a substation. AV1 observed the map application on Zuberi's cell phone state that Zuberi was 2 hours and 4 minutes away from his destination. AV1 knew at that point that Zuberi was not a police officer and that she was being kidnapped.

8. During the trip, the Zuberi pulled his vehicle over and forced AV1 to perform both oral and vaginal sex. Zuberi attempted to have anal sex with AV1 but stopped after AV1 pleaded for him not to do it. AV1 was placed back in the car and Zuberi continued to travel

south.

9. At approximately 7:00 a.m. on July 15, 2023, Zuberi pulled over at a truck stop north of Klamath Falls and placed a backwards hooded sweatshirt onto AV1 to cover her face. Zuberi then drove AV1 to his residence located at 1336 North El Dorado Avenue, Klamath Falls Oregon. Zuberi moved AV1 into a makeshift cell that he had constructed in his garage. The cell was made of cinder blocks and a metal door installed in reverse so it could not be opened from the inside. AV1 was placed inside the cell and the door was locked. Zuberi claimed he had to leave to do paperwork.

10. AV1 briefly slept and awoke to the realization that she would likely die if she did not attempt to escape. AV1 repeatedly banged on the door and was able to break the door open and escape the room. Once outside of the cell, she observed the Zuberi's vehicle parked in the garage, opened the vehicle door, observed the handgun, retrieved it, and fled. AV1 sought assistance from a passing motorist who called 9-1-1.

11. AV1 was transported to Sky Lakes Medical Center for a Sexual Assault Nurse Examination. Later that day, AV1 rode with law enforcement to identify the house where she was held captive. At the residence, officers located blood on the wooden fence AV1 climbed over to escape her confinement. Law enforcement interviewed neighbors and Zuberi's wife, searched law enforcement databases, and ultimately determined Zuberi was associated with the residence. AV1's physical description of Zuberi also matched the physical description the person registered to the Zuberi's vehicle, the person described by the neighbors, and law enforcement records associated with Zuberi.

12. On or about July 16, 2023, Klamath Falls Police Department obtained a search warrant for Zuberi's residence at 1336 North El Dorado Avenue, Klamath Falls Oregon. Inside the garage of the residence, law enforcements observed the makeshift cell described by AV1:



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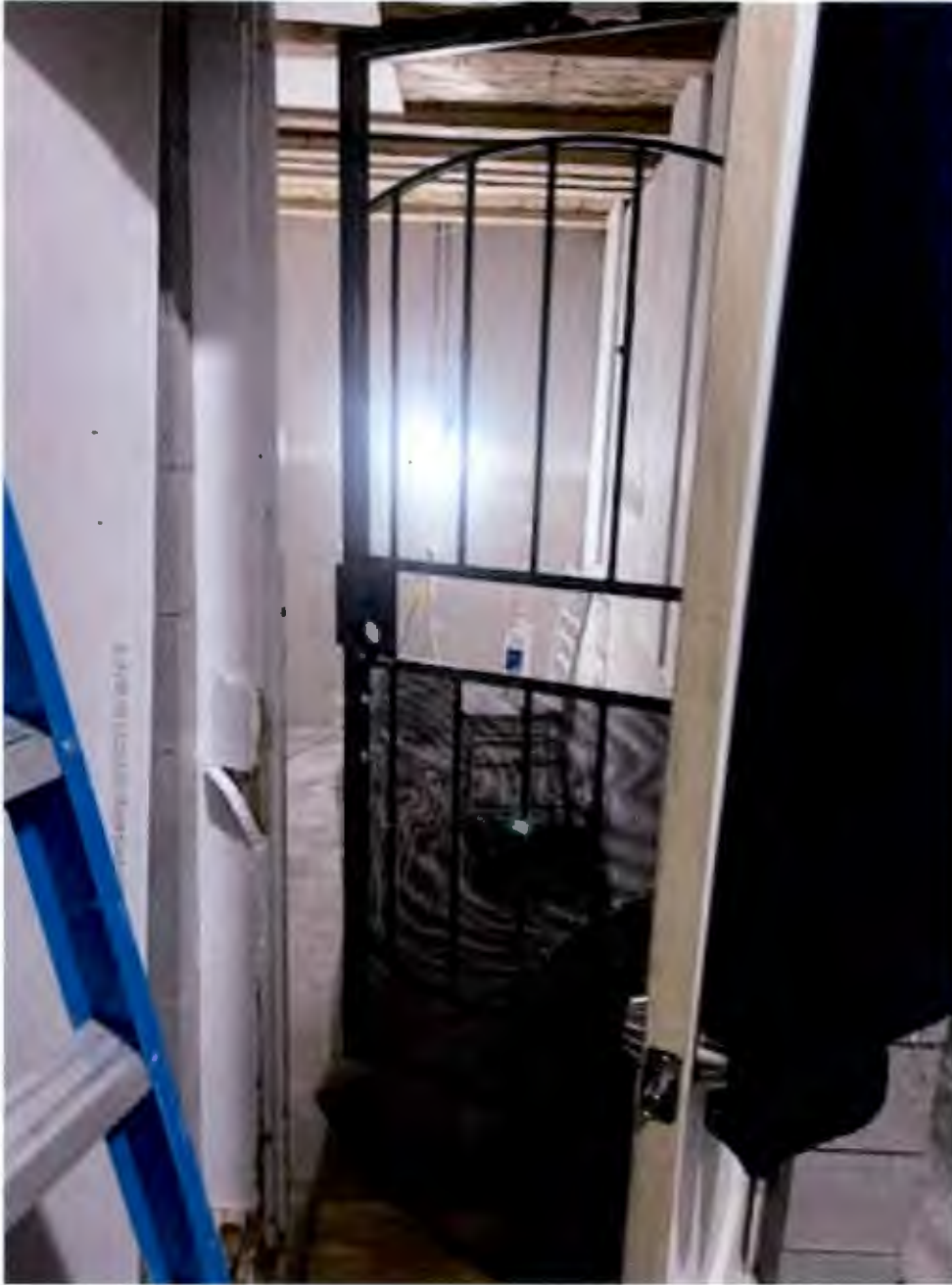
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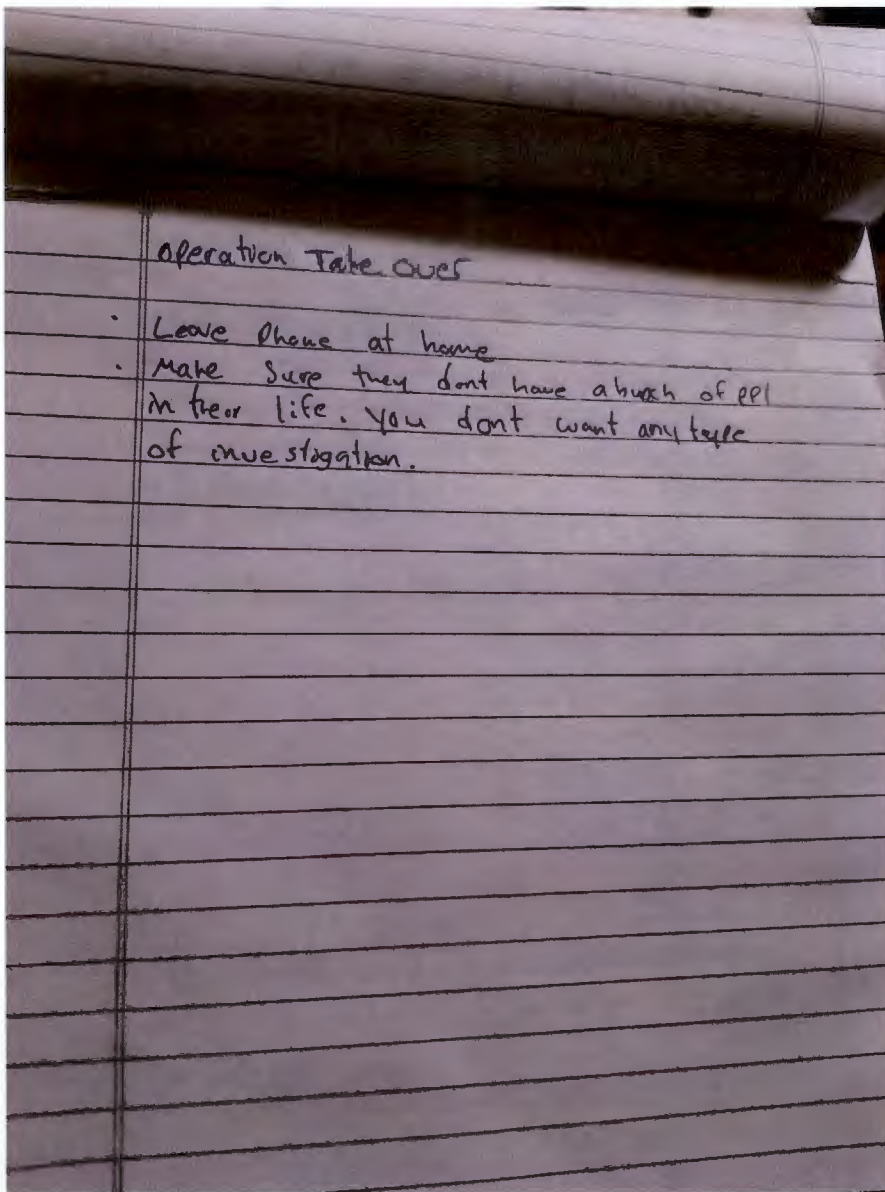


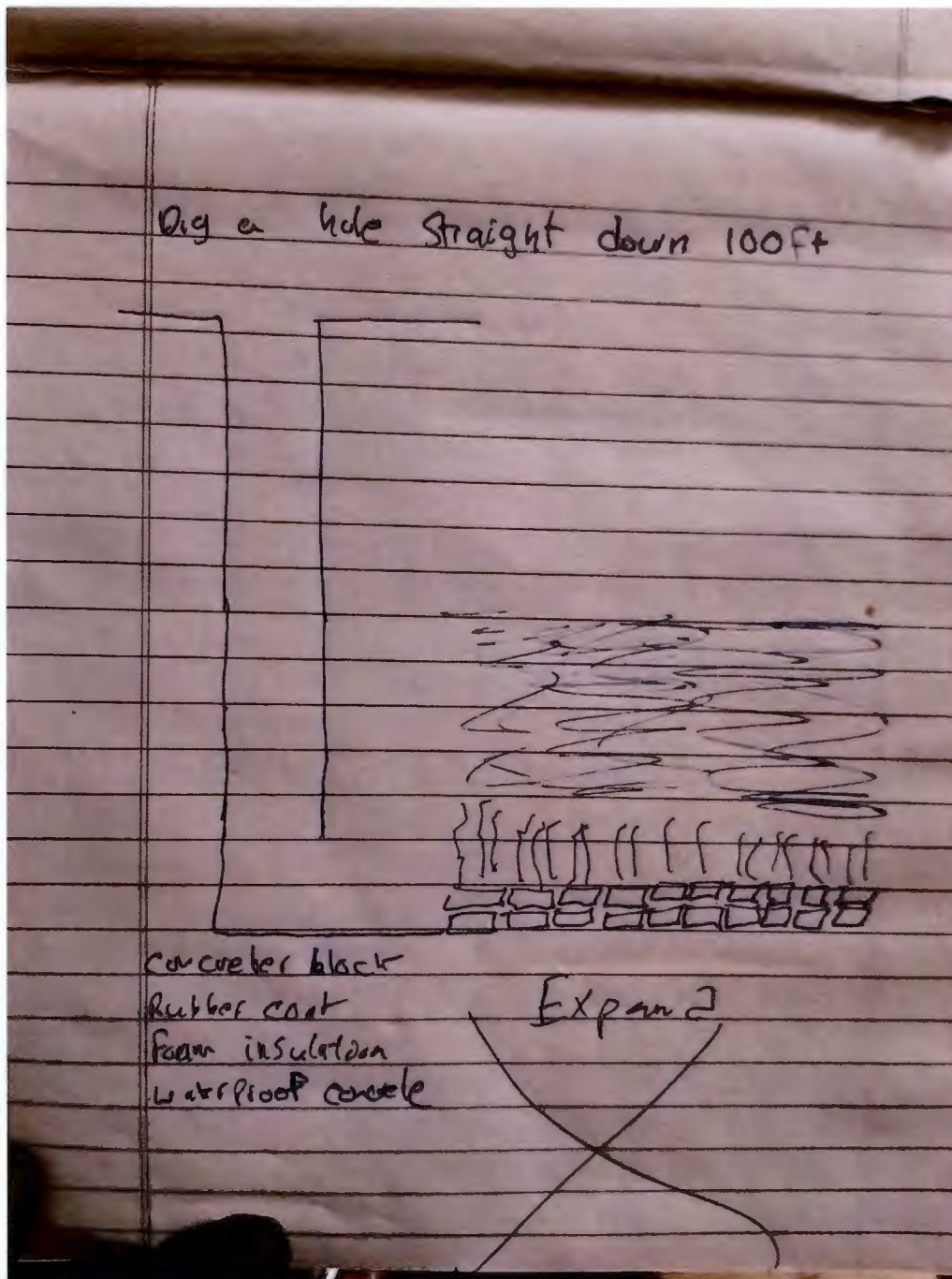
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12. AVI's purse was located next to the makeshift cell in the garage. Inside Zuberi's residence law enforcement also recovered a firearm box matching the serial number, make, and model of the firearm AVI retrieved from Zuberi's vehicle when she escaped, and documents, writings, mail, and bank statements identifying the residence as being occupied by Zuberi. Law enforcement also recovered the handwritten notes shown below:





13. On or about July 16, 2023, law enforcement obtained cell phone data for the cellphones belonging to AV1 and Zuberi. GPS location data from those phones showed AV1

and Zuberi in Seattle, Washington on July 15, 2023, and then traveling from Seattle, Washington to Klamath Falls, Oregon later that day.

14. The afternoon of July 16, 2023, two Nevada State Patrol officers located Zuberi in a Walmart parking lot on the south side of Reno, Nevada. Law enforcement observed Zuberi holding one of his children in the front seat of his vehicle. Zuberi's wife was outside the vehicle speaking to him. When Zuberi was contacted by law enforcement, he refused to exit the vehicle and cut himself with a sharp object causing him to bleed profusely. He also attempted to destroy his phone. Zuberi eventually agreed to exit the vehicle and was taken into custody. The child was unharmed.

Conclusion

15. Negasi Zuberi, AKA: Justin Joshua Hyché; Sakima Zuberi; and Justin Kouassi, date of birth XX/XX/1993, (hereinafter Zuberi), for interstate kidnapping, in violation of Title 18, United States Code, Section 1201. I therefore request that the Court issue a criminal complaint and arrest warrant for Negasi Zuberi.

16. Prior to being submitted to the Court, this affidavit, the accompanying complaint and the arrest warrant were all reviewed by Assistant United States Attorney (AUSA) John Brassell, and AUSA Brassell advised me that in his opinion the affidavit and complaint are legally and factually sufficient to establish probable cause to support the issuance of the requested criminal complaint and arrest warrant.

Request for Sealing

17. It is respectfully requested that the Court issue an order sealing, until further order of the Court, all papers submitted in support of the requested criminal complaint and arrest

warrant. I believe that sealing these documents is necessary because the information to be seized is relevant to an ongoing investigation, and any disclosure of the information at this time may endanger the life or physical safety of an individual, cause flight from prosecution, cause destruction of or tampering with evidence, cause intimidation of potential witnesses, or otherwise seriously jeopardize an investigation. Premature disclosure of the affidavit, the criminal complaint, and the arrest warrant may adversely affect the integrity of the investigation.

S/Travis R. Gluesenkamp

Travis R. Gluesenkamp
Special Agent, FBI

Sworn in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone at 3:55
a.m/p.m. on 7/17/23.

MARK D. CLARKE
United States Magistrate Judge