

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
 :
 v. : Crim. No. 23-
 :
 SOAUIB BUTCHER : Count 1
 : 18 U.S.C. §1594(c)
 : (Conspiracy to Commit Sex Trafficking
 : of a Minor)
 :
 : Count 2
 : 18 U.S.C. §§1591(a)(1), (b)(2), and (c)
 : (Sex Trafficking of a Minor)
 :
 : Count 3
 : 18 U.S.C. §2423(a)
 : (Transportation of a Minor to Engage in
 : Criminal Sexual Activity)

INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark,
charges as follows:

COUNT 1
(Conspiracy to Commit Sex Trafficking of a Minor)

The Defendant and Other Individuals

1. At all times relevant to the Indictment:
 - a. Defendant SOAUIB BUTCHER was a resident of Brooklyn, New York, and Elizabeth, New Jersey.
 - b. Co-Conspirator-1 was a resident of Elizabeth who was engaged in prostitution.
 - c. Victim-1 was a minor who had attained the age of 14 years but had not attained the age of 18 years.

The Conspiracy

2. From on or about August 14, 2019 to on or about January 16, 2020, in Union County, in the District of New Jersey and elsewhere, the defendant,

SOAUIB BUTCHER,

did knowingly and intentionally conspire with others, known and unknown, to recruit, entice, harbor, transport, provide, obtain, advertise, maintain, and solicit, by any means, in and affecting interstate commerce, Victim-1, having had a reasonable opportunity to observe Victim-1, and knowing and in reckless disregard of the fact that Victim-1 had not attained the age of 18 years, and that Victim-1 would be caused to engage in a commercial sex act, contrary to Title 18, United States Code, Sections 1591(a)(1), (b)(2), and (c).

Manner and Means of the Conspiracy

3. The goal of the conspiracy was to obtain money by having Victim-1 engage in commercial sex acts.

4. It was part of the conspiracy that:

a. BUTCHER arranged for the transportation of and transported Victim-1 from and between New Jersey and the New York with the intent that the minor victim engage in commercial sex acts.

b. Co-Conspirator-1 posted ads to escort websites, using photographs of Victim-1 in order for Victim-1 to meet with customers and engage in commercial sex acts.

c. BUTCHER and Co-Conspirator-1 scheduled Victim-1 to meet with customers and engage in commercial sex acts, sometimes more than once per day.

d. For engaging in commercial sex acts with Victim-1, customers paid BUTCHER directly or paid Victim-1, who turned over the money to BUTCHER.

e. BUTCHER, Co-Conspirator-1, and others known and unknown used vehicles, public highways, motels, telephones, and the internet to facilitate commercial sex acts with Victim-1.

f. Victim-1 lived in a series of motels with BUTCHER and Co-Conspirator-1 during the time that she was engaging in commercial sex acts. BUTCHER paid for the motels and Victim-1's food and clothing.

g. BUTCHER saw Victim-1 most days and often slept in the same motel room as Victim-1.

Overt Acts

5. In furtherance of the conspiracy, and to effect its object, BUTCHER and others known and unknown, committed the following overt acts in the District of New Jersey and elsewhere:

a. On or about August 14, 2019, BUTCHER instructed Victim-1 to run away from a group home in Bridgewater, New Jersey where Victim-1 had been living to meet BUTCHER at the New Jersey Transit train station in Somerville, New Jersey.

b. On or about August 14, 2019, BUTCHER traveled by train with Victim-1 from Somerville to Brooklyn, New York.

c. From on or about August 14, 2019 to on or about August 17, 2019, Victim-1 lived with BUTCHER in Brooklyn. During that time, BUTCHER brought Victim-1 to the rooftop of an apartment building where BUTCHER instructed Victim-1 to perform oral sex on an unknown individual in exchange for money.

d. On or about August 17, 2019, BUTCHER told Victim-1 that BUTCHER was going to bring Victim-1 to New Jersey to introduce Victim-1 to Co-Conspirator-1 so that Co-Conspirator-1 could teach Victim-1 how to engage in commercial sex acts.

e. On or about August 17, 2019, BUTCHER traveled with Victim-1 by train from Brooklyn to Elizabeth, New Jersey to meet with Co-Conspirator-1.

f. On or about August 17, 2019, Co-Conspirator-1 met with Victim-1 and taught Victim-1 how to engage in commercial sex acts.

g. Between on or about August 17, 2019 and December 22, 2019, Co-Conspirator-1 posted advertisements that featured photographs of Victim-1 to an escort website more than approximately 200 times, including approximately three times on or about December 22, 2019.

h. On or about December 24, 2019, Victim-1 ran away from BUTCHER, but BUTCHER called her repeatedly, and Victim-1 eventually returned to BUTCHER and continued to engage in commercial sex acts for him.

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

Count 2
(Sex Trafficking of a Minor)

6. The allegations set forth in Paragraphs 1 and 3 through 5 of Count 1 of this Indictment are incorporated by reference here.

7. From on or about August 14, 2019 through on or about January 16, 2020, in Union County, in the District of New Jersey and elsewhere, the defendant,

SOAUIB BUTCHER,

did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, and solicit by any means, in and affecting interstate commerce, Victim-1, having had a reasonable opportunity to observe Victim-1, and knowing and in reckless disregard of the fact that Victim-1 had not attained the age of 18 years, and that the Victim-1 would be caused to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), and (c), and Section 2.

Count 3
(Transportation of a Minor to Engage in Criminal Sexual Activity)

8. The allegations set forth in Paragraphs 1 and 3 through 5 of Count 1 of this Indictment are incorporated by reference here.

9. On or about August 17, 2020 in Union County, in the District of New Jersey and elsewhere, the defendant,

SOAUIB BUTCHER,

did knowingly transport an individual who had not attained the age of 18 years, Victim-1, in interstate commerce, with intent that Victim-1 engage in prostitution and in any sexual activity for which any person can be charged with a criminal offense.

In violation of Title 18, United States Code, Sections 2423(a) and 2.

Forfeiture Allegation
(Counts 1 and 2)

Upon conviction of one or both of the offenses in violation of 18 U.S.C. § 1591 and 1594 charged in Counts 1 and 2 of this Indictment, the defendant, SOAUIB BUTCHER, shall forfeit to the United States, pursuant to 18 U.S.C. § 1594(d), and 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), all of his right, title, and interest in any property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such offense(s); and any property, real or personal, constituting or derived from proceeds the defendant obtained, directly or indirectly, as a result of such offense(s); and all property traceable to such property.

Forfeiture Allegation
(Count 3)

Upon conviction of the offense in violation of 18 U.S.C. § 2423(a) charged in Count 3 of this Indictment, the defendant, SOAUIB BUTCHER, shall forfeit to the United States, pursuant to 18 U.S.C. § 2428, and 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), all of his right, title, and interest in any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such offense; and any property, real or personal, constituting or derived from proceeds the defendant obtained, directly or indirectly, as a result of such offense; and all property traceable to such property.

Substitute Assets Provision
(Applicable to All Forfeiture Allegations)

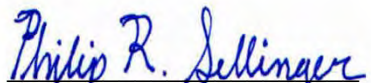
If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (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), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

A TRUE BILL

FOREPERSON


PHILIP R. SELLINGER
United States Attorney