

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

NOV 22 PM 4:34
U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL J. ZACHARIAS,

Defendant.

) INDICTMENT
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3:20 CR 679
CASE NO.

Title 18, United States Code,
Sections 1591(a)(1) and (b)(1)

JUDGE ZOUHARY

COUNT 1

(Sex Trafficking of a Minor, 18 U.S.C. § 1591(a)(1))

The Grand Jury charges:

1. From approximately 1999 to on or about July 7, 2006, in the Northern District of Ohio, Western Division, and elsewhere, Defendant MICHAEL J. ZACHARIAS, in or affecting interstate or foreign commerce, knowingly recruited, enticed, harbored, transported, provided, or obtained by any means a person, to wit: then minor teen victim "R.B.," knowing that the victim had not attained the age of 18 years and would be caused to engage in a commercial sex act, in violation of Title 18, United States Code, Section 1591(a)(1).

COUNT 2

(Sex Trafficking of an Adult by Force, Fraud, or Coercion, 18 U.S.C. §§ 1591(a)(1) and (b)(1))

The Grand Jury further charges:

2. From on or about July 8, 2006 to on or about March 10, 2010, in the Northern District of Ohio, Western Division, and elsewhere, Defendant MICHAEL J. ZACHARIAS, in or affecting interstate or foreign commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, or maintained by any means a person, to wit: adult victim "R.B.," knowing,

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and in reckless disregard of the fact, that means of force, threats of force, fraud, or coercion described in 18 U.S.C. § 1591(e)(2), or any combination of such means, would be used to cause the victim to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1).

COUNT 3

(Sex Trafficking of an Adult by Force, Fraud, or Coercion, 18 U.S.C. §§ 1591(a)(1) and (b)(1))

The Grand Jury further charges:

3. From approximately July 6, 2012 to on or about January 31, 2015, in the Northern District of Ohio, Western Division, and elsewhere, Defendant MICHAEL J. ZACHARIAS, in or affecting interstate or foreign commerce, knowingly recruited, enticed, harbored, obtained, or maintained by any means a person, to wit: adult victim "R.B.," knowing that means of force, threats of force, fraud, or coercion described in 18 U.S.C. § 1591(e)(2), or any combination of such means, would be used to cause the victim to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1).

COUNT 4

(Sex Trafficking of an Adult by Force, Fraud, or Coercion, 18 U.S.C. §§ 1591(a)(1) and (b)(1))

The Grand Jury further charges:

4. From approximately 2017 to on or about July 20, 2020, in the Northern District of Ohio, Western Division, and elsewhere, Defendant MICHAEL J. ZACHARIAS, in or affecting interstate or foreign commerce, knowingly recruited, enticed, harbored, obtained, maintained, patronized, or solicited by any means a person, to wit: adult victim "R.B.," knowing, and in reckless disregard of the fact, that means of force, threats of force, fraud, or coercion described in 18 U.S.C. § 1591(e)(2), or any combination of such means, would be used to cause the victim to

engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1).

COUNT 5

(Sex Trafficking of a Minor by Force, Fraud, or Coercion, 18 U.S.C. §§ 1591(a)(1) and (b)(1))

The Grand Jury further charges:

5. From on or about June 2, 2009 to on or about August 2010, in the Northern District of Ohio, Western Division, and elsewhere, Defendant MICHAEL J. ZACHARIAS, in or affecting interstate or foreign commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, or maintained by any means a person, to wit: minor victim "G.B." who was then approximately 15-16 years old, knowing, and in reckless disregard of the fact, that the victim had not attained the age of 18 years and would be caused to engage in a commercial sex act, by means of force, threats of force, fraud, or coercion described in subsection (e)(2), or by any combination of such means, in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1).

COUNT 6

(Sex Trafficking of a Minor by Force, Fraud, or Coercion, 18 U.S.C. §§ 1591(a)(1) and (b)(1))

The Grand Jury further charges:

6. From on or about June 2, 2010 to on or about June 1, 2011, in the Northern District of Ohio, Western Division, and elsewhere, Defendant MICHAEL J. ZACHARIAS, in or affecting interstate or foreign commerce, knowingly recruited, enticed, harbored, transported, provided, obtained or maintained by any means a person, to wit: minor victim "G.B." who was then approximately 16 years old, knowing, and in reckless disregard of the fact, that the victim had not attained the age of 18 years and would be caused to engage in a commercial sex act, by

means of force, threats of force, fraud, or coercion described in subsection (e)(2), or by any combination of such means, in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1).

COUNT 7

(Sex Trafficking of an Adult by Force, Fraud, or Coercion, 18 U.S.C. §§ 1591(a)(1) and (b)(1))

The Grand Jury further charges:

7. From on or about June 2, 2012 to on or about June 1, 2013, in the Northern District of Ohio, Western Division, and elsewhere, Defendant MICHAEL J. ZACHARIAS, in or affecting interstate or foreign commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, or maintained by any means a person, to wit: victim "G.B." who was then approximately 18 years old, knowing, and in reckless disregard of the fact, that means of force, threats of force, fraud, or coercion described in 18 U.S.C. § 1591(e)(2), or any combination of such means, would be used to cause the victim to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1).

COUNT 8

(Sex Trafficking of an Adult by Force, Fraud, or Coercion, 18 U.S.C. §§ 1591(a)(1) and (b)(1))

The Grand Jury further charges:

8. From approximately January 2011 to on or about April 30, 2015, in the Northern District of Ohio, Western Division, and elsewhere, Defendant MICHAEL J. ZACHARIAS, in or affecting interstate or foreign commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, or maintained by any means a person, to wit: adult victim "G.D.," knowing, and in reckless disregard of the fact, that means of force, threats of force, fraud, or coercion described in 18 U.S.C. § 1591(e)(2), or any combination of such means, would be used to cause

the victim to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1).

COUNT 9

(Sex Trafficking of an Adult by Force, Fraud, or Coercion, 18 U.S.C. §§ 1591(a)(1) and (b)(1))

The Grand Jury further charges:

9. From approximately June 2015 to on or about January 11, 2020, in the Northern District of Ohio, Western Division, and elsewhere, Defendant MICHAEL J. ZACHARIAS, in or affecting interstate or foreign commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, maintained, patronized, or solicited by any means a person, to wit: adult victim "G.D.," knowing, and in reckless disregard of the fact, that means of force, threats of force, fraud, or coercion described in 18 U.S.C. § 1591(e)(2), or any combination of such means, would be used to cause the victim to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1).

COUNT 10

(Sex Trafficking of an Adult by Force, Fraud, or Coercion, 18 U.S.C. §§ 1591(a)(1) and (b)(1))

The Grand Jury further charges:

10. From approximately 1999 to on or about December 31, 2001, in the Northern District of Ohio, Western Division, and elsewhere, Defendant MICHAEL J. ZACHARIAS, in or affecting interstate or foreign commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, or maintained by any means a person, to wit: adult victim "T.W.," knowing that means of force, threats of force, fraud, or coercion described in 18 U.S.C. § 1591(e)(2), or any combination of such means, would be used to cause the victim to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1).

FORFEITURE SPECIFICATION

The Grand Jury further charges:

11. The allegations of Counts 1 through 10, inclusive, are hereby re-alleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 1594(d). As a result of the foregoing offenses, Defendant MICHAEL J. ZACHARIAS, shall forfeit to the United States: (i) all property, real and personal, that was involved in, used - or intended to be used - to commit or to facilitate the commission of the offenses, and all property traceable to such property; and, (ii) all property, real and personal, constituting - or derived from - any proceeds that the defendant obtained, directly or indirectly, as a result of the offenses, and all property traceable to such property; including, but not limited to, the following:

- a) Apple iPhone XR, serial # DX5C39PNKXKN;
- b) Dell Inspiron laptop, serial # 3FJZ142;
- c) Apple iPad Pro, grey in color, IMEI 355450071451551;
- d) Samsung cell phone, IMEI 990004508931429; and
- e) Floppy disks, SD cards, VHS tapes, and thumb drives, with (a) - (e) all having been seized on or about August 18, 2020, from Defendant's residence located on Greendale Avenue in Findlay, Ohio.

- f) Seagate Barracuda 7200.12 external hard drive, serial # 9VYB3DLV; and
- g) My Passport external hard drive, serial # WXE1A597PHFJ, which were both seized on or about August 18, 2020 from Defendant's office at St. Catherine's Parish, 750 Bright Rd, Findlay, Ohio.

- h) Fantom Drive Green, serial # SD9169533;
- i) Lenovo laptop, serial # LR-VFA9; and
- j) CNT computer tower, serial # 106724653, all three of which were identified as Defendant's and located on or about August 18, 2020 at St. Catherine's Parish, 750 Bright Rd, Findlay, Ohio.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.