

UNITED STATES DISTRICT COURT  
for the  
District of New Jersey

ORIGINAL FILED  
MAR 18 2013  
WILLIAM T. WALSH, CLERK

United States of America )  
v. )  
IBN ABDULLAH, )  
a/k/a "Askia Abdullah," )  
a/k/a "Ibn," )  
a/k/a "Ib" )  
\_\_\_\_\_  
*Defendant(s)*

Case No. \_\_\_\_\_  
Mag. No. 13-5520 (KMW)

**CRIMINAL COMPLAINT**

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 10/2/12 through March 2013 in the county of Atlantic in the  
\_\_\_\_\_ District of New Jersey, the defendant(s) violated:

*Code Section*  
21 U.S.C. § 846,  
21 U.S.C. § 841(a)(1) and  
841(b)(1)(A).

*Offense Description*  
Conspiracy to distribute, and to possess with intent to distribute, 1 kilogram or  
more of a mixture or substance containing a detectable amount of heroin.  
  
For further description see Attachment A.

This criminal complaint is based on these facts:

See attached Affidavit of Probable Cause - Attachment B.

Continued on the attached sheet.



*Complainant's signature*

Special Agent Christopher Kopp, FBI

*Printed name and title*

Sworn to before me and signed in my presence.

Date: 03/18/2013



*Judge's signature*

City and state: Camden, New Jersey

Honorable Karen M. Williams, U.S.M.J.

*Printed name and title*

# CONTENTS APPROVED

UNITED STATES ATTORNEY

By:   
Patrick C. Askin, Assistant U.S. Attorney

Date: March 18, 2013

**ATTACHMENT A**

From in or about October 2, 2012 and continuing through in or about March 2013, in Atlantic County, in the District of New Jersey and elsewhere, the defendant,

**IBN ABDULLAH,  
a/k/a "Askia Abdullah,"  
a/k/a "Ibn,"  
a/k/a "Ib,"**

did knowingly and intentionally conspire and agree with others, known and unknown, to distribute and to possess with intent to distribute 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

In violation of Title 21, United States Code, Section 846.