

ATTACHMENT A

On or about March 8, 2024, in Bergen County, in the District of New Jersey and elsewhere, the defendant,

TIMOTHY ALAN BLANK,

did knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of N-phenyl-N- [1- (2-phenylethyl) -4-piperidinyl] propenamide (fentanyl), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

ATTACHMENT B

I, Adrian Vlahovic, am a Special Agent with Homeland Security Investigations (“HSI”). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and other items of evidence. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where statements of others are related herein, they are related in substance and part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. On or about March 8, 2024, law enforcement observed a 2016 black Cadillac CTS (“the Cadillac”) driving eastbound on or near Myrtle Avenue in or near Fort Lee, New Jersey. Law enforcement observed the driver of the Cadillac, later identified as Timothy Alan Blank (“BLANK”), commit various motor vehicle violations, including failing to stop at a stop sign. Law enforcement officers stopped the Cadillac at or near Sylvan Avenue in Englewood Cliffs, New Jersey.

2. Upon approaching the Cadillac during the stop, law enforcement observed an adult female (“Individual-1”) occupying the passenger-side of the Cadillac. Law enforcement also immediately noticed that both BLANK and Individual-1 appeared visibly nervous. Law enforcement then engaged both BLANK and Individual-1 in conversation, inquiring as to their reason for being in the area. BLANK and Individual-1 provided conflicting answers. Believing that the Cadillac might contain narcotics, law enforcement enlisted the assistance of a canine trained in narcotics detection. Shortly thereafter, a trained law enforcement officer walked the canine around the Cadillac. The canine indicated near the trunk area of the Cadillac.

3. Law enforcement officers then proceeded to inspect the trunk area of the Cadillac. Upon opening the trunk of the Cadillac, law enforcement observed in plain view a brown weighted CVS bag which contained five squared off bricks tightly wrapped in clean plastic, consistent with narcotics (“the Narcotics Package”). Law enforcement then proceeded to arrest both BLANK and Individual-1.

4. After being advised of and waiving his *Miranda* rights, BLANK informed agents of the following:

- a. On or about March 3, 2024, at the direction of a co-conspirator (“the Co-Conspirator”), BLANK received the Narcotics Package from an individual at or near Los Angeles International Airport (“LAX”),

located in or near Los Angeles, California.

- b. BLANK, who was aware that the Narcotics Package contained a controlled substance, then proceed to travel in the Cadillac to New Jersey, arriving on or about March 6, 2024.
- c. Upon arriving in or near Englewood Cliffs, New Jersey, BLANK waited for a telephone call from the Co-Conspirator, at which time BLANK would be provided information from the Co-Conspirator so to exchange the Narcotics Package for approximately \$195,000 in United States Currency (“USC”) with an unknown individual.
- d. After completing the narcotics transaction, BLANK would be compensated by the Co-Conspirator approximately \$8,000.00 in USC.

5. Law enforcement subsequently field-tested the Narcotics Package that was located in the trunk of the Cadillac and determined that it contained a substance containing a detectable amount of fentanyl and weighed approximately 5.7 kilograms.