
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Hon. James B. Clark, III
 : :
 : v. Magistrate. No. 23-12128
 : :
SUFYAN A. ABDULLAH : :
 : **CRIMINAL COMPLAINT**

I, Aaron Perkins, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and incorporated as a part hereof.

 /s/ Aaron Perkins
Aaron Perkins, Special Agent
Federal Bureau of Investigation

Special Agent Perkins attested to this Affidavit by telephone pursuant to F.R.C.P. 4.1(B)(2)(A) on this 18th day of July 2023.

 Hon. James B. Clark III
Hon. James B. Clark, III
United States Magistrate Judge

ATTACHMENT A

Count One
(Bank Robbery)

On or about July 8, 2023, in Union County, in the District of New Jersey, and elsewhere, the defendant,

SUFYAN A. ABDULLAH,

did, by force, violence, and intimidation, knowingly take or attempt to take from the person and presence of others, namely, employees of BANK-1, located in or around Elizabeth, New Jersey, money belonging to, and in the care, custody, control, management, and possession of BANK-1, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT TWO
(Bank Robbery)

On or about July 15, 2022, in Union County, in the District of New Jersey, and elsewhere, the defendant,

SUFYAN A. ABDULLAH,

did, by force, violence, and intimidation, knowingly take and attempt to take from the person and presence of others, namely, employees of BANK-2, located in or around Springfield, New Jersey, approximately \$1,972 in money belonging to, and in the care, custody, control, management, and possession of BANK-2, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

ATTACHMENT B

I, Aaron Perkins, am a Special Agent of the Federal Bureau of Investigation. The information contained in the complaint is based upon my personal knowledge, as well as information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of relevant facts; (b) my review of publicly available information; and (c) my review of evidence, including video surveillance, photographs, and other documents. 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 the contents of documents and the actions and statements of others are reported herein, they are reported in substance and in part, except where otherwise indicated. 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 July 8, 2023, a male dressed in an orange construction vest, a white shirt, and a white construction hat, and carrying a camouflage backpack, later identified as the defendant, SUFYAN A. ABDULLAH ("ABDULLAH"), entered a bank in Elizabeth, New Jersey ("BANK-1"). ABDULLAH handed a note to a teller ("Teller-1") which read, "I have 2 guns in my bag – if you make me nervous I will panic and there will be a mass shooting – stay calm – listen." Teller-1 asked ABDULLAH the denominations in which he would like his money and ABDULLAH, appearing nervous, turned around and immediately exited BANK-1 without answering the teller.

2. Following the robbery of BANK-1, law enforcement reviewed surveillance footage of the incident from BANK-1 as well as surveillance footage from the surrounding area. The surveillance from the surrounding area showed ABDULLAH entering a white Cadillac with distinctive rims (the "White Cadillac") after fleeing from BANK-1. In reviewing additional surveillance, law enforcement discerned the White Cadillac's registration, which shows that the White Cadillac is registered to ABDULLAH.

3. On or about July 15, 2023, a man dressed in an orange construction vest and a baseball hat, and carrying a black backpack, later identified as ABDULLAH, entered a bank in Springfield, New Jersey ("BANK-2"). ABDULLAH approached a teller ("Teller-2") Teller-2 at BANK-2 and placed an object on Teller-2's desk. ABDULLAH said that if Teller-2 did not give him money, then he would blow up the bank. Teller-2 responded that she did not have any money in her register. ABDULLAH turned to another teller ("Teller-3") and demanded that she give him money. Teller-3 gave ABDULLAH all of the cash in her register, which totaled approximately \$1,972. ABDULLAH left the object on the counter and told the employees of BANK-2 that he would blow up the bank if he saw anyone following him or heard sirens. In making that threat, ABDULLAH showed the employees of BANK-2 an application on his phone and claimed that the application was capable of detonating the purported explosive device.

4. Following ABDULLAH's flight from BANK-2, law enforcement examined the purported explosive device that he had left behind and determined that it was an imitation explosive device.

5. Following the robbery of BANK-2, law enforcement reviewed surveillance footage of the incident from BANK-2 as well as surveillance footage from the surrounding area. Surveillance from the surrounding area showed ABDULLAH arrive in a white Cadillac, which appears to be the same vehicle ABDULLAH used at Bank-1 in Elizabeth (*i.e.* the White Cadillac). ABDULLAH exited the White Cadillac wearing an orange construction vest. ABDULLAH opened the trunk, placed an item or items into a black backpack, and put on a baseball hat. ABDULLAH walked in the direction of BANK-2. Surveillance shows ABDULLAH walking back to the White Cadillac after the robbery, reentering the car, and driving away from the area.

6. BANK-1 and BANK-2 are both financial institutions insured by the Federal Deposit Insurance Corporation.

7. A search of social media reveals an individual with a username matching ABDULLAH's name and description, wearing orange construction vests and white construction hats, with the White Cadillac.