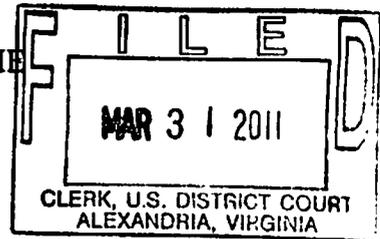


IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA



Alexandria Division

UNITED STATES OF AMERICA )  
 )  
 v. )  
 )  
 YOMADE SAHEED ABORISHADE )  
 )  
 Defendant )

Case No. 1:11MJ251

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT**

I, John Armbruster, being duly sworn, depose and state as follows:

1. I am a Special Agent with United States Department of Homeland Security, Homeland Security Investigations (HSI) and have been so employed since March 2003. From 2001 to March 2003, I was employed as a Special Agent with the U.S. Customs Service. As such, I am an "investigative or law enforcement officer" of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516(1). I have participated in numerous narcotics and money laundering investigations and search warrants resulting in the convictions of numerous drug distributors and money launders and the seizure of significant quantities of controlled substances and other evidence.
2. I have attended the twelve-week Criminal Investigator Training Program at the Federal Law Enforcement Training Center (FLETC) and the Customs Basic Enforcement School, during which I received training in detection of and laws concerning controlled

substances. I have personally investigated several cases involving controlled substances. My duties as a Special Agent with HSI include, but are not limited to, the investigation of federal laws governing the importation of controlled substances (21 U.S.C. § 952).

3. This affidavit is submitted in support of a criminal complaint for Yomade Saheed ABORISHADE for knowingly and intentionally attempting to import into the customs territory of the United States from a location outside the customs territory of the United States a mixture and substance containing 100 grams or more of heroin, a Schedule I controlled substance, in violation Title 21, United States Code, Sections 963 and Title 21, United States Code, Sections 952. This affidavit is also submitted in support of an arrest warrant for Yomade Saheed ABORISHADE.

4. The facts set forth in this affidavit are based on my personal knowledge and review of records, documents, and other physical evidence obtained during this investigation, as well as information conveyed to me by other law enforcement officials and private persons. Unless specifically indicated, all conversations and statements described in this affidavit are related in substance and in part only and are not intended to be a verbatim recitation of such statements.

5. Since this affidavit is being submitted for the limited purpose of obtaining an arrest warrant, it does not include each and every fact observed by me or known to the government. I have set forth only those facts necessary to support a finding of probable cause.

**Summary**

6. As described more fully in this affidavit, there is probable cause to believe that Yomade Saheed ABORISHADE, on or about March 25, 2011, did knowingly and intentionally attempt to import into the customs territory of the United States from a location outside the customs territory of the United States a mixture and substance containing 100 grams or more of heroin, a Schedule I controlled substance, in violation Title 21, United States Code, Sections 963 and Title 21, United States Code, Sections 952.

**Probable Cause**

7. On March 30, 2011, ABORISHADE did attempt to enter the United States after arriving at Dulles International Airport, which is in the Eastern District of Virginia in the customs territory of the United States, on board United Airlines flight #991 from Accra, Ghana. Upon examination by Customs and Border Protection (CBP) officers, ABORISHADE provided multiple and conflicting reasons for his travel. ABORISHADE was transported to Reston Hospital Center, in the Eastern District of Virginia, for further examination.

8. While at the Reston Hospital Center, ABORISHADE volunteered to have his abdominal area x-rayed. X-ray results confirmed the presence of foreign bodies in ABORISHADE's abdomen. ABORISHADE was observed by CBP officers expelling pellets from his body. As of the writing of this affidavit, ABORISHADE has expelled approximately 95 pellets weighing over one kilogram. CBP officers field tested the contents of one of the expelled pellets and it tested positive for the presence of heroin. The untested pellets appear to have the same substance.

9. Based upon the above information and my training and experience, over one kilogram of heroin is consistent with further distribution.

10. Based upon the above information and my training and experience, I have probable cause to believe that Yomade Saheed ABORISHADE, on or about March 30, 2011, did knowingly and intentionally attempt to import into the customs territory of the United States from a place outside the customs territory of the United States 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 952 and 963.

  
\_\_\_\_\_  
John Armbruster  
Special Agent  
U.S. Department of Homeland Security  
Homeland Security Investigations

Sworn to and subscribed before me this 31<sup>th</sup> day of March, 2011.

\_\_\_\_\_  
/s/  
Ivan D. Davis  
United States Magistrate Judge