

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
HARRISONBURG DIVISION

UNITED STATES OF AMERICA :
 :
 v. : Case No. 5:21-CR-15
 :
 ABDALLAH AMER ALI :

STATEMENT OF FACTS

The following statement of facts is incorporated by reference as part of the plea agreement in Case No. 5:21-CR-15 between the United States and the defendant, Abdallah Amer Ali. This statement of facts briefly summarizes the facts and circumstances surrounding the defendant’s criminal conduct in this case. It does not contain all of the information obtained during the investigation and applicable to an accurate Presentence Investigation Report and Sentencing Guidelines Calculation. It is not protected by proffer agreement or any other agreement, and shall be wholly admissible at trial notwithstanding any rules or statutes to the contrary.

Abdallah Ali hereby agrees and stipulates that the following information is true and accurate:

1. On October 22, 2019, in Harrisonburg, Virginia, Abdallah Ali arranged through SnapChat to sell and distribute one or more pills to A.R; the pills were called “percs,” and Mr. Ali knew they contained a controlled substance. Afterward, A.R. advised Mr. Ali on Snapchat that he (A.R.) planned to take all of the pills, which Mr. Ali advised him not to do. Subsequent testing indicated that A.R. ingested a

substance containing N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, or fentanyl, a Schedule II controlled substance.

2. Two days later, on October 24, 2022, Mr. Ali acknowledged in a conversation on Snapchat that he sold A.R. “percs” on October 22, 2022.

3. Testing of “perc” residue from Mr. Ali’s own prior use of “percs” as well as “percs” acquired through subsequent controlled distributions with a cooperating, confidential informants revealed that the Mr. Ali’s “percs” contained N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, or fentanyl.

I agree that this is a correct statement of the facts the United States would have proven had this matter gone to trial.

Date: 6/1/22

Abdallah Amer Ali
Abdallah Amer Ali

Date: 6/2/22

Jonathan Jones
Jonathan Jones
Assistant United States Attorney

Date: 6/1/22

Gene Hart
Gene Hart
Counsel for Defendant