

COUNT TWO

(Murder - First Degree)

Yusuf Ibrahim

between on or about February 4, 2013, and on or about February 5, 2013, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, knowingly or purposely did cause the death of A.K. and/or did cause serious bodily injury resulting in the death of A.K., contrary to the provisions of N.J.S.A. 2C:11-3a(1) and/or N.J.S.A. 2C:11-3a(2), and against the peace of this state, the government and dignity of the same.

COUNT THREE

(Felony Murder - First Degree)

YUSUF IBRAHIM

between on or about February 4, 2013, and on or about February 5, 2013, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, acting alone or with one or more persons did cause the death of H.T. during the commission of a robbery and/or kidnapping, contrary to the provisions of N.J.S.A. 2C:11-3a(3), and against the peace of this state, the government and dignity of the same.

COUNT FOUR

(Felony Murder - First Degree)

YUSUF IBRAHIM

between on or about February 4, 2013, and on or about February 5, 2013, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, acting alone or with one or more persons did cause the death of A.K. during the commission of a robbery and/or kidnapping, contrary to the provisions of N.J.S.A. 2C:11-3a(3), and against the peace of this state, the government and dignity of the same.

COUNT FIVE

(Robbery - First Degree)

YUSUF IBRAHIM

between on or about February 4, 2013, and on or about February 5, 2013, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, in the course of committing a theft, knowingly did inflict bodily injury upon H.T., by use of a deadly weapon, that is, a handgun, contrary to the provisions of N.J.S.A. 2C:15-1, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Robbery - First Degree)

YUSUF IBRAHIM

between on or about February 4, 2013, and on or about February 5, 2013, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, in the course of committing a theft, knowingly did inflict bodily injury upon A.K., by use of a deadly weapon, that is, a handgun, contrary to the provisions of N.J.S.A. 2C:15-1, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Kidnapping - First Degree)

YUSUF IBRAHIM

between on or about February 4, 2013, and on or about February 5, 2013, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, unlawfully did confine H.T. for a substantial period with the purpose to inflict bodily injury on or to terrorize H.T. and/or to facilitate the commission of a crime, and did fail to release the said H.T. unharmed prior to apprehension, contrary to the provisions of N.J.S.A. 2C:13-1b, and against the peace of this state, the government and dignity of the same.

COUNT EIGHT

(Kidnapping - First Degree)

YUSUF IBRAHIM

between on or about February 4, 2013, and on or about February 5, 2013, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, unlawfully did confine A.K. for a substantial period with the purpose to inflict bodily injury on or to terrorize A.K. and/or to facilitate the commission of a crime, and did fail to release the said A.K. unharmed prior to apprehension, contrary to the provisions of N.J.S.A. 2C:13-1b, and against the peace of this state, the government and dignity of the same.

COUNT NINE

(Desecrating Human Remains - Second Degree)

YUSUF IBRAHIM

between on or about February 5, 2013, and on or about February 6, 2013, at the Township of Buena Vista, in the County of Atlantic, elsewhere, and within the jurisdiction of this Court, did knowingly unlawfully conceal, desecrate, damage or destroy the human remains of H.T., contrary to the provisions of N.J.S.A. 2C:22-1a, and against the peace of this state, the government and dignity of the same.

COUNT TEN

(Desecrating Human Remains - Second Degree)

YUSUF IBRAHIM

between on or about February 5, 2013, and on or about February 6, 2013, at the Township of Buena Vista, in the County of Atlantic, elsewhere, and within the jurisdiction of this Court, did knowingly unlawfully conceal, desecrate, damage or destroy the human remains of A.K., contrary to the provisions of N.J.S.A. 2C:22-1a, and against the peace of this state, the government and dignity of the same.

COUNT ELEVEN

(Possession of a Firearm for an Unlawful Purpose - Second Degree)

YUSUF IBRAHIM

between on or about February 4, 2013, and on or about February 7, 2013, at the City of Jersey City, in the County of Hudson, elsewhere, and within the jurisdiction of this Court, did possess a certain weapon, that is, a firearm, with purpose to use it unlawfully against the person or property of another, contrary to the provisions of N.J.S.A. 2C:39-4a, and against the peace of this state, the government and dignity of the same.

COUNT TWELVE

(Unlawful Possession of a Weapon - Second Degree)

YUSUF IBRAHIM

between on or about February 4, 2013, and on or about February 7, 2013, at the City of Jersey City, in the County of Hudson, at the Township of Buena Vista, in the County of Atlantic, elsewhere, and within the jurisdiction of this Court, knowingly did possess a certain weapon, that is, a handgun, without having first obtained a permit to carry same as provided in N.J.S.A. 2C:58-4, contrary to the provisions of N.J.S.A. 2C:39-5b, and against the peace of this state, the government and dignity of the same.

COUNT THIRTEEN

(Possession of a Weapon for an Unlawful Purpose - Third Degree)

YUSUF IBRAHIM

between on or about February 5, 2013, and on or about February 6, 2013, at the Township of Buena Vista, in the County of Atlantic, elsewhere, and within the jurisdiction of this Court, did possess certain weapons, that is, a saw and/or a tire iron and/or a pair of scissors, with the purpose to use them unlawfully against the person or property of another, contrary to the provisions of N.J.S.A. 2C:39-4d, and against the peace of this state, the government and dignity of the same.

COUNT FOURTEEN

(Unlawful Possession of a Weapon - Fourth Degree)

YUSUF IBRAHIM

between on or about February 5, 2013, and on or about February 6, 2013, at the Township of Buena Vista, in the County of Atlantic, elsewhere, and within the jurisdiction of this Court, knowingly did possess certain weapons, that is, a saw and/or a tire iron and/or a pair of scissors, under circumstances not manifestly appropriate for such lawful uses as it may have, contrary to the provisions of N.J.S.A. 2C:39-5d, and against the peace of this state, the government and dignity of the same.

COUNT FIFTEEN

(Hindering Apprehension or Prosecution - Third Degree)

YUSUF IBRAHIM

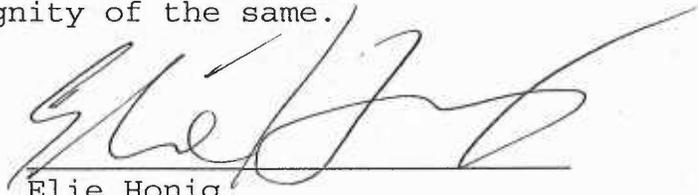
between on or about February 5, 2013 and on or about February 10, 2013, at the City of Jersey City, in the County of Hudson, at the Township of Buena Vista, in the County of Atlantic, at the City of Philadelphia, in the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, with purpose to hinder his own apprehension, prosecution, conviction or punishment, did suppress, by way or concealment or destruction, any evidence of the crime, regardless of its admissibility in evidence, which might aid in his discovery or apprehension or in the lodging of a charge against the said defendant, contrary to the provisions of N.J.S.A. 2C:29-3b, and against the peace of this state, the government and dignity of the same.

COUNT SIXTEEN

(Tampering with Physical Evidence - Fourth Degree)

YUSUF IBRAHIM

between on or about February 5, 2013 and on or about February 6, 2013, at the City of Jersey City, in the County of Hudson, at the Township of Buena Vista, in the County of Atlantic, at the City of Philadelphia, in the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, believing that an official proceeding or investigation was pending or about to be instituted, knowingly did alter, destroy or conceal an object, article record, document or other thing of physical substance, that is, a saw and/or a tire iron and/or a pair of scissors and/or a 1997 white Mercedes Benz C280 bearing New Jersey Registration N69BSV, with the purpose to impair its verity or availability in such proceeding or investigation, contrary to the provisions of N.J.S.A. 2C:28-6(1), and against the peace of this state, the government and dignity of the same.



Elie Honig
Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Dated: 4-28-14

FILED

APR 28 2014

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ651-14-1
Superior Court
Docket Number 14-04-00044-S

STATE OF NEW JERSEY)

 v.)

YUSUF IBRAHIM)

ORDER OF VENUE

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this 28th day of April, ²⁰¹⁴~~2013~~ pursuant to paragraph 8 of the State Grand Jury Act, that the County of Hudson be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Hudson for filing.

Mary C. Jacobson, A.J.S.C.
Mary C. Jacobson, A.J.S.C.