

State of Minnesota,
Plaintiff,

v.

COMPLAINT- WARRANT

Abdirahman Abdulkadir Abdullahi, DOB 4/9/1992 (27)
1430 4th Ave SE
#107
Rochester, MN 55904
Defendant.

The Complainant, being duly sworn, makes complaint to the above-named Court and states that there is probable cause to believe that the Defendant committed the following offense(s):

Count: 1 Attempted Murder - 2nd Degree - With Intent-Not Premeditated, Aid and Abet
In Violation of: 609.19 subd. 1(1)
Penalty Statute: 609.19 subd. 1 - Murder - 2nd Degree
Supplemental(1): 609.11 subd. 5(a) - Minimum Sentences of Imprisonment-Firearm Use or Possession
Supplemental(2): 609.17 subd. 1 - Anticipatory Crimes-Attempts
Supplemental(3): 609.05 subd. 1 - Liability for Crimes of Another-Intentional
MOC: H2341
ICR: 19038904
Modifier: 609.17 subd. 1 - Anticipatory Crimes-Attempts
Penalty: 3- 20 years imprisonment (MSG SL 11)

On or about August 7, 2019, within the County of Olmsted, Abdirahman Abdulkadir Abdullahi did or did intentionally aid, advise, hire, counsel, or conspire with or otherwise procure the other to commit the crime, to-wit: Iman Abucar-Hagi Iman and did wrongfully, unlawfully and feloniously attempted to cause the death of a human being, to-wit: Victim, with intent to effect the death of that person or another, but without premeditation.

Count: 2 Assault-1st Degree-Great Bodily Harm, Aid and Abet
In Violation of: 609.221 subd. 1
Penalty Statute: 609.221 subd. 1 - Assault-1st Degree-Great Bodily Harm
Supplemental(1): 609.11 subd. 5(a) - Minimum Sentences of Imprisonment-Firearm Use or Possession
Supplemental(2): 609.05 subd. 1 - Liability for Crimes of Another-Intentional
MOC: A1231
ICR: 19038904
Modifier: 609.05 subd. 1 - Liability for Crimes of Another-Intentional
Penalty: 3 - 20 years in prison, a \$30,000 fine, or both

On or about August 7, 2019, within the County of Olmsted, Abdirahman Abdulkadir Abdullahi did or did intentionally aid, advise, hire, counsel, or conspire with or otherwise procure the other to commit the crime, to-wit: Iman Abucar-Hagi Iman and did wrongfully, unlawfully and feloniously assault another, to-wit: Victim, and inflict great bodily harm.

Count: 3 Assault-2nd Degree-Dangerous Weapon-Substantial Bodily Harm, Aid and Abet
In Violation of: 609.222 subd. 2
Penalty Statute: 609.222 subd. 2 - Assault-2nd Degree-Dangerous Weapon-Substantial Bodily Harm

STATEMENT OF PROBABLE CAUSE

Your complainant is a licensed peace officer employed by the Rochester Police Department. In that capacity your Complainant has reviewed the police reports relating to Abdirahman Abdulkadir Abdullahi, the above-named defendant, and the allegations contained therein. Based upon that information, your complainant believes the following to be true and correct.

On August 7, 2019, at approximately 9:41 PM, officers of the Rochester Police Department were dispatched to Meadow Park Apartments in Rochester, Olmsted County, Minnesota, on a report of a shooting. Dispatch received a call from an unidentified male screaming that there was a shooting at the last building of the complex near the garages; later confirmed to be 1430 4th Ave SE. Upon arrival, officers located Victim- a male fully identified in police reports, in front of unit #305. Victim was unresponsive, covered with blood, and appeared to have several gunshot wounds on his body. Officer Matz found that Victim had three gunshot wounds to his upper chest, a gunshot wound to the back of his head, and a gunshot wound to his left shin below the knee. Officers also located Witness- a male fully identified in police reports, next to Victim. Victim was removed from the scene for questioning.

Officers conducted a preliminary investigation at the scene located directly in front of apartment #305. Officers observed blood spatter in the area, pools of blood near the location where Victim was initially found, shell casings, and three cell phones scattered around Victim. Officers canvassed the area and learned that people heard a physical commotion in the hallway followed by gun shots. A witness indicated he heard a thud which sounded like a person falling to the ground and then approximately 6 to 7 gunshots. Other individuals heard a male screaming in the hallway followed by people running down the hall away from the incident location.

Inv. Weber spoke with Witness. Witness told Inv. Weber that Victim lived in unit #307. Witness was with Victim just moments before the shooting. Witness stated he went to the bathroom and upon exiting the bathroom heard a commotion outside of the apartment. The door to the apartment was open and Witness was able to see Victim with two men on top of him. Witness identified one of the males on top of Victim as "Mazi Iman." "Mazi" is a known street name for Iman Abucar-Hagi Iman (06/19/1993). Witness saw that Iman had a pistol in his hand. Iman matched the physical characteristics of a male on apartment surveillance running into the building with a pistol in his hand. Surveillance also showed Iman with pistol in hand running alongside another male in a blue sweatshirt with his hood pulled up. Witness was going to call 911 while in #307, but heard shots being fired. Witness said everyone was gone from the area as he exited the apartment. Witness was shown surveillance of three individuals running from the apartment building and Witness again identified Iman. Victim was transported to St. Mary's Hospital with several gunshot wounds to his chest and head. Victim's condition was deemed critical and medical staff did not know if he would survive his injuries.

Victim did survive his injuries, but was paralyzed by one or more of the gunshots. On September 3, 2019, Inv. Weber met with Victim at a hospital where he was being treated. Victim was able to recall the events of the shooting. Victim told Inv. Weber that leading up the shooting he was outside his apartment complex. While outside two males approached him and "fight or flight kicked in" and he started running for his safety. Victim identified the males as "Mazi" and "Benny." Benny is a known street name for Abdirahman Abdulkadir Abdullahi (4/9/1992). Abdullahi is a known associate of Iman. Victim said that Abdullahi was wearing a blue sweatshirt. Victim said the two males chased him and he remembers tripping and going to the floor. Victim remembered being helpless on the ground and being attacked. Victim did not remember anything after that. Victim said he is acquainted with Iman and Abdullahi because they had been to his home. Victim positively identified Iman and Abdullahi as "Mazi" and "Benny."

Iman was convicted of Felony 5th Degree Controlled Substance Possession in 55-CR-18-276 which makes him ineligible to possess firearms.

Due to the severity of this offense the State believes that Abdullahi presents a significant public safety concern and a potential flight risk. Therefore, a COMPLAINT WARRANT is requested.

Complainant requests that Defendant, subject to bail or conditions of release, be:

- (1) Arrested or other lawful steps be taken to obtain Defendant's appearance in court; or
- (2) Detained, if already in custody, pending further proceedings; and that said Defendant otherwise be dealt with according to law.

COMPLAINANT'S NAME:

COMPLAINANT'S SIGNATURE:

Chris Weber

[Handwritten Signature]

Subscribed and sworn to before the undersigned this ____ day of _____, 2019.

NAME/TITLE:

SIGNATURE:

Julie Ellingson, Notary

[Handwritten Signature]




Being authorized to prosecute the offenses charged, I approve this complaint.

PROSECUTING ATTORNEY'S SIGNATURE:

Date: 9/10/19

[Handwritten Signature]

Joseph K. Rosholt 0396684
 Associate County Attorney
 Government Center
 151 4th Street SE
 Rochester, MN 55904-3710
 (507) 328-7600

Court File Number: _____

FINDING OF PROBABLE CAUSE

From the above sworn facts, and any supporting affidavits or supplemental sworn testimony, I, the Issuing Officer, have determined that probable cause exists to support, subject to bail or conditions of release where applicable, Defendant's arrest or other lawful steps to be taken to obtain Defendant's appearance in court, or Defendant's detention, if already in custody, pending further proceedings. Defendant is therefore charged with the above-stated offense(s).

SUMMONS

THEREFORE, YOU THE ABOVE-NAMED DEFENDANT, ARE HEREBY SUMMONED to appear on the _____ day of _____, 20__ at _____ before the above-named court at _____, MN to answer this complaint.

X WARRANT

To the Sheriff of the above-named county; or other person authorized to execute this warrant: I hereby order, in the name of the State of Minnesota, that the above-named Defendant be apprehended and arrested without delay and brought promptly before the above-named court (if in session), and if not, before a Judge or Judicial Officer of such court without unnecessary delay, and in any event not later than 36 hours after the arrest or as soon as such Judge or Judicial Officer is available to be dealt with according to law.

_____ *Execute in MN Only* X *Execute Nationwide* _____ *Execute in Border States*

ORDER OF DETENTION

Since the above-named Defendant is already in custody, I hereby order, subject to bail or conditions of release, that the above-named Defendant continue to be detained pending further proceedings.

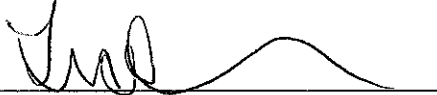
Bail:
Conditions of Release:

This complaint, duly subscribed and sworn to, is issued by the undersigned Judicial Officer this 6th day of September, 20 19.

JUDICIAL OFFICER:

SIGNATURE:

NAME: _____



TITLE: _____

Sworn testimony has been given before the Judicial Officer by the following witnesses:

COUNTY OF OLMSTED STATE OF MINNESOTA	Clerk's Signature or File Stamp:
State of Minnesota Plaintiff, vs. Abdirahman Abdulkadir Abdullahi Defendant.	RETURN OF SERVICE I hereby Certify and Return that I have served a copy of this Summons upon the Defendant(s) herein-named. Signature of Authorized Service Agent:

DEFENDANT FACT SHEET

Other DOBs:

Race/Ethnicity:

CID:

Alias Information:

Fingerprinted:

Handgun Permit:

Location of Violation:

Driver's License #:

Accident Type:

License Plate #:

BAC Status:

BAC Level:

Statute and Offense Grid

Count: 3

Ct	Statute Type	Offense Date	Statute #/Descr and Sup	Level	MOC	GOC	Rpt Ctrl Agncy	Rpt Ctrl #
1	State Statute	8/7/2019	609.19 subd. 1(1) - Attempted Murder - 2nd Degree - With Intent-Not Premeditated, Aid and Abet 609.19 subd. 1 - Murder - 2nd Degree 609.11 subd. 5(a) - Minimum Sentences of Imprisonment-Firearm Use or Possession 609.17 subd. 1 - Anticipatory Crimes-Attempts 609.05 subd. 1 - Liability for Crimes of Another-Intentional	F	H2341	Attempt	MN0550100	19038904
2	State Statute	8/7/2019	609.221 subd. 1 - Assault-1st Degree-Great Bodily Harm, Aid and Abet 609.221 subd. 1 - Assault-1st Degree-Great Bodily Harm 609.11 subd. 5(a) - Minimum Sentences of Imprisonment-Firearm Use or Possession 609.05 subd. 1 - Liability for	F	A1231	NA	MN0550100	19038904

Crimes of Another-Intentional

3	State Statute	8/7/2019	609.222 subd. 2 - Assault-2nd Degree-Dangerous Weapon-Substantial Bodily Harm, Aid and Abet 609.222 subd. 2 - Assault-2nd Degree-Dangerous Weapon-Substantial Bodily Harm 609.11 subd. 5(a) - Minimum Sentences of Imprisonment-Firearm Use or Possession 609.05 subd. 1 - Liability for Crimes of Another-Intentional	F	A2232	NA	MN0550100	19038904
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