

State of Minnesota  
County of Hennepin

District Court  
4th Judicial District

Prosecutor File No. 20A06851  
Court File No. 27-CR-20-13544

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**State of Minnesota,**

Plaintiff,

vs.

**ABDULLAHI AHMED MOHAMED DOB: 04/12/1998**

3001 4th ST SE, APT. 107  
MINNEAPOLIS, MN 55414

Defendant.

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**COMPLAINT**

Warrant

The Complainant submits this complaint to the Court and states that there is probable cause to believe Defendant committed the following offense(s):

**COUNT I**

**Charge: Criminal Vehicular Homicide - Operate Motor Vehicle in Grossly Negligent Manner**

Minnesota Statute: 609.2112.1(a)(1), with reference to: 609.2112.1(a)

Maximum Sentence: 10 YEARS AND/OR \$20,000

Offense Level: Felony

Offense Date (on or about): 06/08/2020

Control #(ICR#): 20154981

Charge Description: That on or about 6/8/2020, in Hennepin County, Minnesota, ABDULLAHI AHMED MOHAMED, did by operating a motor vehicle in a grossly negligent manner, cause the death of VICTIM 1.

**COUNT II**

**Charge: Criminal Vehicular Homicide - Driver Who Causes Collision Leaves Scene**

Minnesota Statute: 609.2112.1(a)(7), with reference to: 609.2112.1(a)

Maximum Sentence: 10 YEARS AND/OR \$20,000

Offense Level: Felony

Offense Date (on or about): 06/08/2020

Control #(ICR#): 20154981

Charge Description: That on or about 6/8/2020, in Hennepin County, Minnesota, ABDULLAHI AHMED MOHAMED did, by operating a motor vehicle, cause a collision that caused the death of VICTIM 1, and ABDULLAHI AHMED MOHAMED left the scene of that collision.

**COUNT III**

**Charge: Criminal Vehicular Operation - Bodily harm - Gross Negligence**

Minnesota Statute: 609.2113.3(1), with reference to: 609.2113.3

Maximum Sentence: 1 YEAR AND/OR \$3,000

Offense Level: Gross Misdemeanor

Offense Date (on or about): 06/08/2020

Control #(ICR#): 20154981

Charge Description: That on or about 6/8/2020, in Hennepin County, Minnesota, ABDULLAHI AHMED MOHAMED did, by operating a motor vehicle in a grossly negligent manner, cause bodily harm to VICTIM 2.

#### **COUNT IV**

**Charge: Criminal Vehicular Operation - Bodily Harm - Leave scene of collision**

Minnesota Statute: 609.2113.3(7), with reference to: 609.2113.3

Maximum Sentence: 1 YEAR AND/OR \$3,000

Offense Level: Gross Misdemeanor

Offense Date (on or about): 06/08/2020

Control #(ICR#): 20154981

Charge Description: That on or about 6/8/2020, in Hennepin County, Minnesota, ABDULLAHI AHMED MOHAMED did, by operating a motor vehicle, cause a collision that caused bodily harm to VICTIM 2 and ABDULLAHI AHMED MOHAMED left the scene of that collision.

## STATEMENT OF PROBABLE CAUSE

Complainant has investigated the facts and circumstances of this offense and believes the following establishes probable cause:

On June 8, 2020 at approximately 5:20 AM, Minneapolis Police responded to the intersection of Lowry Avenue NE and Marshall Street NE in Minneapolis, Hennepin County, Minnesota on a report of a vehicle crash.

Upon arrival, officers observed a multi-vehicle crash with one vehicle, a Chevy Tahoe, described by multiple officers as "completely engulfed in flames." The driver of the Tahoe, hereafter "Victim 1," was trapped in the vehicle as it burned. Victim 1 died on the scene.

Witnesses described a silver Honda Accord, speeding on Lowry and entering the intersection after running a red light. The Accord was driven by a man later identified as ABDULLAHI AHMED MOHAMED, Defendant herein. The Accord struck Victim 1's Tahoe at a high rate of speed, and both vehicles then struck a Honda Odyssey which was stopped at the red light. The driver of the Odyssey, "Victim 2," sought medical attention for abdominal pain.

A blood trail led from the driver's door of the Accord to the rear of an adjacent building where officers detained Defendant. Defendant was visibly injured and struggling to walk and claimed that he had not been in any of the vehicles. Defendant later claimed he was a passenger in one of the vehicles.

Two men, later identified as passengers in the Accord, were also injured. Both men claimed to have no knowledge of who else was in the car, and both were in possession of more than \$3,800.00 in cash. Inside the Accord, police found an open bottle of Hennessy Cognac, a marijuana "blunt," a tightly-rolled dollar bill commonly used for "snorting" narcotics, and an unlabeled pill bottle with multiple pills inside.

Traffic video of the crash depicts Defendant running a red light and speeding into the intersection where his vehicle strikes Victim 1's Tahoe. The Tahoe was immediately set ablaze.

Defendant was arrested in Minneapolis on April 23, 2020 for Driving While Intoxicated, Careless Driving, Speeding, and Driving After Revocation. At the time of his arrest, he was observably under the influence of a controlled substance, failed field sobriety tests, admitted to having consumed drugs, and refused to submit to a lawful blood draw.

Defendant's criminal history since 2016 includes multiple convictions for false information to police, driving after revocation, speeding, and failing to stop for a traffic control device.

Defendant is not in custody. Due to the substantial danger to public safety represented by Defendant's recent conduct, the State requests this case issue as a warrant.

The State will seek an aggravated sentence based upon particular cruelty to the victim, fleeing the scene of a vehicle engulfed in flames while the victim is trapped inside, lying to police, Defendant's revoked driver's license, and speeding.

## SIGNATURES AND APPROVALS

Complainant requests that Defendant, subject to bail or conditions of release, be:  
(1) arrested or that 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 declares under penalty of perjury that everything stated in this document is true and correct. Minn. Stat. § 358.116; Minn. R. Crim. P. 2.01, subds. 1, 2.

**Complainant**

John E. Engle  
Sergeant  
350 S 5th St  
Minneapolis, MN 55415-1389  
Badge: 1803

Electronically Signed:  
06/09/2020 01:27 PM  
Hennepin County, Minnesota

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

**Prosecuting Attorney**

Paige L Starkey  
300 S 6th St  
Minneapolis, MN 55487  
(612) 348-5550

Electronically Signed:  
06/09/2020 01:19 PM

**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 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 DEFENDANT, ARE SUMMONED to appear on \_\_\_\_\_, \_\_\_\_\_ at \_\_\_\_\_ AM/PM before the above-named court at the address listed on the attached court summons to answer this complaint.

IF YOU FAIL TO APPEAR in response to this SUMMONS, a WARRANT FOR YOUR ARREST shall be issued.

**WARRANT**

To the Sheriff of the above-named county; or other person authorized to execute this warrant: I order, in the name of the State of Minnesota, that the Defendant be apprehended and arrested without delay and brought promptly before the 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*                       *Execute Nationwide*                       *Execute in Border States*

**ORDER OF DETENTION**

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

Bail: \$300,000.00  
Conditions of Release:

This complaint, duly subscribed and sworn to or signed under penalty of perjury, is issued by the undersigned Judicial Officer as of the following date: June 9, 2020.

**Judicial Officer**                      Luis Bartolomei                      Electronically Signed: 06/09/2020 01:45 PM  
District Court Judge

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

**COUNTY OF HENNEPIN  
STATE OF MINNESOTA**

**State of Minnesota**

Plaintiff

vs.

**ABDULLAHI AHMED MOHAMED**

Defendant

*LAW ENFORCEMENT OFFICER RETURN OF SERVICE  
I hereby Certify and Return that I have served a copy of this Warrant  
upon the Defendant herein named.*

Signature of Authorized Service Agent:

## DEFENDANT FACT SHEET

**Name:** ABDULLAHI AHMED MOHAMED  
**DOB:** 04/12/1998  
**Address:** 3001 4th ST SE, APT. 107  
MINNEAPOLIS, MN 55414

**Alias Names/DOB:**  
**SID:**  
**Height:**  
**Weight:**  
**Eye Color:**  
**Hair Color:**  
**Gender:** MALE  
**Race:** Black  
**Fingerprints Required per Statute:** Yes  
**Fingerprint match to Criminal History Record:** No  
**Driver's License #:**  
**SILS Person ID #:** 862584  
**SILS Tracking No.** 3175189  
**Alcohol Concentration:**

## STATUTE AND OFFENSE GRID

<b>Cnt Nbr</b>	<b>Statute Type</b>	<b>Offense Date(s)</b>	<b>Statute Nbrs and Descriptions</b>	<b>Offense Level</b>	<b>MOC</b>	<b>GOC</b>	<b>Controlling Agencies</b>	<b>Case Numbers</b>
1	Charge	6/8/2020	609.2112.1(a)(1) Criminal Vehicular Homicide - Operate Motor Vehicle in Grossly Negligent Manner	Felony	J1A11		MN0271100	20154981
	Penalty	6/8/2020	609.2112.1(a) Criminal Vehicular Homicide - Penalty	Felony	J1A11		MN0271100	20154981
2	Charge	6/8/2020	609.2112.1(a)(7) Criminal Vehicular Homicide - Driver Who Causes Collision Leaves Scene	Felony	J1311		MN0271100	20154981
	Penalty	6/8/2020	609.2112.1(a) Criminal Vehicular Homicide - Penalty	Felony	J1311		MN0271100	20154981
3	Charge	6/8/2020	609.2113.3(1) Criminal Vehicular Operation - Bodily harm - Gross Negligence	Gross Misdemeanor	J2A01		MN0271100	20154981
	Penalty	6/8/2020	609.2113.3 Criminal Vehicular Operation - Bodily Harm - Penalty	Gross Misdemeanor	J2A01		MN0271100	20154981
4	Charge	6/8/2020	609.2113.3(7) Criminal Vehicular Operation - Bodily Harm - Leave scene of collision	Gross Misdemeanor	J2301		MN0271100	20154981
	Penalty	6/8/2020	609.2113.3 Criminal Vehicular Operation - Bodily Harm - Penalty	Gross Misdemeanor	J2301		MN0271100	20154981