

State of Minnesota
County of Ramsey

District Court
2nd Judicial District

Prosecutor File No.
Court File No.

0620411013
62-CR-19-702

State of Minnesota,

Plaintiff,

vs.

ASAD MOHAMUD IBRAHIM DOB: 01/01/1988

5403 Wolf Creek Court
Arlington, TX 76018

Defendant.

COMPLAINT

Summons

Amended

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: Assault-2nd Degree-Dangerous Weapon

Minnesota Statute: 609.222.1

Maximum Sentence: 7 years or \$14,000 fine or both.

Offense Level: Felony

Offense Date (on or about): 01/25/2019

Control #(ICR#): 19017641

Charge Description: On or about January 25, 2019, in the County of Ramsey, Minnesota, the defendant, Asad Mohamud Ibrahim, did assault another with a dangerous weapon consisting of a firearm.

COUNT II

Charge: Threats of Violence-Reckless Disregard Risk

Minnesota Statute: 609.713.1

Maximum Sentence: 5 years or \$10,000 fine, or both

Offense Level: Felony

Offense Date (on or about): 01/25/2019

Control #(ICR#): 19017641

Charge Description: On or about January 25, 2019, in the County of Ramsey, Minnesota, the defendant, Asad Mohamud Ibrahim, did directly or indirectly threaten to commit a crime of violence, with purpose to cause, or in reckless disregard of the risk of causing, terror in another.

COUNT III

Charge: Dangerous Weapons-Recklessly Handle or Use

Minnesota Statute: 609.66.1(a)(1)

Maximum Sentence: 1 year or \$3,000 fine or both

Offense Level: Gross Misdemeanor

Offense Date (on or about): 01/25/2019

Control #(ICR#): 19017641

Charge Description: On or about January 25, 2019, in the County of Ramsey, Minnesota, Asad Mohamud Ibrahim did recklessly handle or use a gunso as to endanger the safety of another in a park, public housing, or school zone.

STATEMENT OF PROBABLE CAUSE

At approximately 2:50 AM on January 25, 2019, police responded to Unit B at 1139 Supornick Lane, Saint Paul, Ramsey County on a noise complaint. The 911 caller indicated that loud music was coming from the apartment and that it was an ongoing issue.

Officers Marquis and Obrestad parked their squad in front of 1139 Supornick Lane, which is located in a school, public housing, and park zone. They approached Unit B wearing their department issued uniforms. Officer Marquis could hear music coming from the residence as he stood at the door, and he noted there was a peephole in the door. Officer Marquis knocked on the door in a normal manner and looked at the window to his right to see if anyone had peeked out. **ASAD MOHAMUD IBRAHIM (DOB: 01/01/1988)** opened the door with a black handgun that held an extended magazine pointed straight out at the same height as his head as if he were going to shoot whomever had knocked on the door. Officer Marquis, fearing for his life, immediately walked backwards away from the residence. Ibrahim retreated into the apartment briefly before returning to the door. Officer Marquis then saw that Ibrahim was no longer holding the gun. Ibrahim was ordered out of the residence and taken into custody. Ibrahim told officers he had a permit to carry out of Texas.

Officers entered the residence and located a Glock 9mm handgun with an extended magazine in plain view in the living room. The handgun was confirmed as having been reported stolen out of Amarillo, Texas.

While being transported to the Law Enforcement Center, Ibrahim told officers he didn't know it was police knocking on the door because they had knocked too loudly. He claimed that in Texas that is how he will open the door when you do not know who is knocking.

Ibrahim was advised of his constitutional rights and agreed to speak to Sergeant Pinoniemi. He said he is a trucker and that his truck broke down in Illinois. He got a ride to Minnesota because the trucking firm that he works for is based out of Minnesota. He said someone banged on the door, he muted the music they were playing, and asked, "Who is it?" Nobody answered and he became suspicious and afraid. Ibrahim said he saw on Facebook that people should each other in Minnesota.

A gun was on the living room table and he picked it up with his right hand. He said he had training as a security guard so he did not have his finger on the trigger. He opened the door with his left hand looking down the guns sights. When he saw it was a police officer at the door he threw the gun to the couch. He put his hands up because he didn't want to get shot. He denied knowing the gun was stolen.

NOTICE: Pursuant to Minnesota Statute 609.49, subd. 1(a), a person charged with or convicted of a felony and released from custody, with or without bail or recognizance, who intentionally fails to appear when required after having been notified that a failure to appear for a court appearance is a criminal offense, or after having been released on an order or condition that the release personally appear when required with respect to the charge or conviction, is guilty of a crime for failure to appear and may be sentenced to not more than one-half of the maximum term of imprisonment or fine, or both, provided for the underlying crime for which the person failed to appear, but this maximum sentence shall, in no case, be less than a term of imprisonment of one year and one day or a fine of \$1,500, or both.

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

Timothy Pinoniemi
Sergeant
367 Grove St
St Paul, MN 55101
Badge: 212

Electronically Signed:
07/15/2019 07:47 AM
Ramsey County, Minnesota

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

Prosecuting Attorney

Colin Haley
345 Wabasha Street N
Suite 120
St Paul, MN 55102
(651) 266-3222

Electronically Signed:
07/11/2019 10:31 AM

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 15 W Kellogg Blvd, St Paul, MN 55102 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: \$
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: July 15, 2019.

Judicial Officer

Sophia Y. Vuelo
District Court Judge

Electronically Signed: 07/15/2019 08:46 AM

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

**COUNTY OF RAMSEY
STATE OF MINNESOTA**

State of Minnesota

Plaintiff

vs.

Asad Mohamud Ibrahim

Defendant

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

Signature of Authorized Service Agent:

DEFENDANT FACT SHEET

Name: Asad Mohamud Ibrahim
DOB: 01/01/1988
Address: 5403 Wolf Creek Court
Arlington, TX 76018

Alias Names/DOB:

SID: MN19BE0290

Height:

Weight: 0lbs.

Eye Color:

Hair Color:

Gender:

Race:

Fingerprints Required per Statute: Yes

Fingerprint match to Criminal History Record: Yes

Driver's License #:

Alcohol Concentration:

STATUTE AND OFFENSE GRID

Cnt Nbr	Statute Type	Offense Date(s)	Statute Nbrs and Descriptions	Offense Level	MOC	GOC	Controlling Agencies	Case Numbers
1	Charge	1/25/2019	609.222.1 Assault-2nd Degree-Dangerous Weapon	Felony	A2427	N	MN0620900	19017641
2	Charge	1/25/2019	609.713.1 Terroristic Threats-Reckless Disregard Risk	Felony	A9C27	N	MN0620900	19017641
3	Charge	1/25/2019	609.66.1(a)(1) Dangerous Weapons-Recklessly Handle or Use	Gross Misdemeanor	W222C		MN0620900	19017641