

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 19A12794
Court File No. 27-CR-19-25602

State of Minnesota,
Plaintiff,

COMPLAINT
Order of Detention

vs.

MAHAD JAMA ALI DOB: 09/23/2001

3542 Dupont Ave N
Minneapolis, MN 55412

Defendant.

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: Murder - 2nd Degree - With Intent-Not Premeditated

Minnesota Statute: 609.19.1(1), with reference to: 609.229.3(a), 609.11.5(a), 609.19.1, 609.11.9

Maximum Sentence: 40 YEARS

Offense Level: Felony

Offense Date (on or about): 10/11/2019

Control #(ICR#): 19308674

Charge Description: That on or about 10/11/2019, in Hennepin County, Minnesota, Mahad Jama Ali, caused the death of victim, a human being, with intent to effect the death of that person or another, but without premeditation, for the benefit of, at the direction of, in association with or motivated by involvement with a criminal gang, with the intent to promote, further, or assist in criminal conduct by gang members while using a firearm.

Minimum Sentence: 3 YEARS

STATEMENT OF PROBABLE CAUSE

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

On 10/11/2019, at approximately 6:25 p.m., Minneapolis police were dispatched to the area of 23rd Avenue North and Aldrich Avenue North in the City of Minneapolis, County of Hennepin, on the report of a shooting. The remarks of the call were that the caller heard 6-8 shots and there was someone on the ground. A ShotSpotter device recorded 10 actual shots from the incident at 6:23 p.m.

As police arrived in the area, dispatch aired that there was a shooting victim placed in the back of a red sedan and leaving the area eastbound on 22nd Avenue North from Aldrich. Police immediately observed a red Chevy Impala driving southbound on Lyndale Ave North, and pulled up next to the vehicle. One of the occupants indicated that, "My brother is shot."

Police initiated a traffic stop, looked inside the Impala, and noticed a male, hereinafter referred to as "victim," laying on the rear passenger side seat with blood on his face. Officers attempted to speak to the victim, but he was unresponsive. They located two bullet wounds in the victim's chest. The officers pulled him out of the vehicle and administered a chest seal. The officers could not find a pulse, and EMT's who arrived shortly thereafter pronounced the victim dead on the scene. The Medical Examiner would later find three through and through bullet wounds, including two fatal wounds to the victim's chest.

The victim's identity was confirmed, and he is known to law enforcement to have been a high ranking member of the, "Somali Outlaws," a criminal street gang.

Prior to stopping the red Impala, officers noticed a gray/silver Nissan Altima that appeared to be following the Impala. The same vehicle would later show up at Hennepin Healthcare, and the occupants were detained and identified as Harun Samatar and Awale Ali. Samatar and Ali are known by law enforcement to be documented members of the 1627 Boys, another criminal street gang that is a rival gang to the Somali Outlaws.

Both gangs are known for retaliatory and escalating violence that often manifests itself in drive-by shootings, attempted murder, and murder. They are known by law enforcement to attack each other over using the same drug dealers.

Police were informed that there was another potential shooting victim who had left the scene in a silver/gray SUV.

At the time, Minneapolis police were already at the front door of Hennepin Health Care Hospital when a gray Jeep Cherokee pulled up. A male, subsequently identified as MAHAD JAMA ALI, DOB 9/23/2001, got out of the jeep and began running towards the front door of the hospital. ALI was yelling that he had been shot. He would in fact have to receive emergency surgery for a bullet wound. Subsequent investigation into ALI would reveal that he had arrived at the scene of the shooting with Harun Samatar and Awale Ali (MOHAD ALI's uncle) in the previously mentioned gray Nissan Altima.

Police observed the Jeep MAHAD ALI had arrived in. They located several bullet fragments and spent .357 caliber shell casings inside the vehicle, as well as many holes both entering and exiting this vehicle. Three of the vehicle's windows were shot out.

While MAHAD ALI was being treated by medical staff in the ICU, an MPD officer was approached by a

female, identified as ALI's mother. She was in distraught and concerned for ALI's well-being. She told the officer that her son had, "a beef," with the victim, and identified the victim by his correct street name. She was so concerned that she claimed she had visited with the victim's parents to discuss their conflict, "awhile back."

Shortly thereafter, the same officer was approached by an identified Somali male whom the officer knew from previous encounters. This male indicated he was a friend of MAHAD ALI, and volunteered that ALI and the victim were rivals and never liked each other.

The driver of the Jeep Cherokee was identified and eventually cooperated with investigators. He is not known or suspected of any gang affiliation or involvement, and there is no known evidence that he was previously familiar with any of the parties in this shooting. He eventually admitted that on the evening of the murder, he had driven into North Minneapolis to buy some Percocet tabs from a street dealer that he knows as "Blue." He drove to the area that he usually finds Blue, which is the McDonalds at 916 W. Broadway.

Blue was there and got into this witness's Jeep in the front passenger seat. This witness purchased some Percocet tabs and Blue told him to bring him up to 23rd and Aldrich because he had another sale to do.

When they arrived at this location, this witness stated that MAHAD ALI got in the back seat directly behind him, also to buy some Percocet from Blue. This witness identified MAHAD ALI from a photograph as the individual who got into his Jeep (and the same individual he had subsequently driven to Hennepin Health Care). At some point after ALI got into the car, he opened up his door and the gunfire started. This witness did not know that anyone other than MAHAD ALI had been shot and did not actually see MAHAD shooting, but did state that he was positive all the gunfire came from behind him, Blue did not have a gun, and he never saw Blue shooting.

After the interview was done, investigators asked this witness if there was any verbal exchange between MAHAD ALI and the victim. This witness said he remembered MAHAD ALI yelling out, "opps!" Investigators are aware that, "opps," is a street term that gang members use to describe opposition or rival gang members.

On 10/12/2019, investigators were able to speak with MAHAD JAMA ALI at Hennepin Healthcare while he was recovering from his gun shot injury. ALI stated he had been in the gray Nissan Altima with his uncle, Awale Ali, and Harun Samatar. ALI stated that he had exited the Altima to fix the windshield wipers when he heard gunshots. ALI stated he did not know who shot him, but remembered a red car and an older male with a bald head. He stated that after he was shot, and he got into a car that a Mexican person was driving. He stated that the Mexican person drove him to the hospital.

Police obtained some surveillance video from private surveillance systems in the neighborhood of the shooting. Upon review, investigators observed the Jeep Cherokee arrived at the shooting location at approximately 6:02 p.m., and parked on the east side of Aldrich Avenue North just south of 22nd Street.

Approximately 18 minutes later, a red Chevy Impala occupied by the victim, and two other identified Somali Outlaws gang members, arrived at the scene. Almost simultaneously, the Nissan Altima that ALI was in drove south on Aldrich Avenue North and passed the red Impala. Approximately one minute later, MAHAD ALI approached the rear passenger side of the Jeep Cherokee and entered the Jeep. Approximately 8 seconds later, the victim can be seen getting out of the red Impala and is also walking towards the rear passenger's side of the Jeep.

When the victim approached the rear passenger door, he stood in place for approximately 3 seconds, then rapidly a few steps towards the direction of where his Impala was parked, and then fell to the ground.

The Jeep then immediately drove north on Aldrich out of camera view. The other occupants of the Impala ran up to the victim, and while one returned back to the Impala, another quickly ran between 2 houses. The red Impala then seen drove next to the victim, before driving off and coming into contact with police. Subsequent investigation would reveal that the individual who ran between the houses had actually picked up a .45 caliber hand gun laying near the victim, and dropped it between the houses. The handgun was located, and this person eventually admitted what he had done. One .45 caliber DCC was located at the scene of the shooting.

On 10/14/19, investigators returned to speak with MAHAD ALI again. ALI was advised that investigators had new evidence that contradicted what he first told investigators. In a recorded, post-Miranda interview, ALI again stated that he had gotten out of the Nissan he was in to fix the windshield wipers when he heard the gunshots. He repeated that he was with his uncle Awale Ali and Harun Samatar. Confirmatory photos of Harun Samatar and and Awale Ali 6/1/95 were shown to him and he told investigators that they were the males he had identified.

MAHAD ALI was informed that surveillance video of the incident showed that his version of events was not what actually occurred. MAHAD ALI then asked investigators to tell him what happened. They informed MAHAD ALI him that the video showed him arriving in the area and walking up to the Jeep, before getting into the back seat behind the driver. ALI was also informed that the driver of the Jeep told them that ALI was there buying Percocet. ALI admitted that he had just lied, and admitted that he did in fact get in the back seat of the Jeep to buy Percocet for Harun Samatar.

Investigators reminded ALI that the event was captured on video, and asked what happened when the victim walked up to the Jeep. ALI responded by saying, "I don't know." Investigators then informed ALI that the video showed the victim walking up to the Jeep, getting shot, then falling to the ground. When informed that the victim was dead, ALI responded by saying, "What did I do?" Investigators told him that he had shot the victim. ALI denied this and then asked how he (ALI) got shot. Investigators told him that the victim shot him.

At this point, MAHAD ALI ended the interview.

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

Marcus Benner
Sergeant
350 S 5th St
Minneapolis, MN 55415-1389
Badge: 000404

Electronically Signed:
10/15/2019 02:39 PM
Hennepin County, Minnesota

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

Prosecuting Attorney

Thad Tudor
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
10/15/2019 02:24 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: \$1,000,000.00

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: October 15, 2019.

Judicial Officer

Todd Fellman
Judge

Electronically Signed: 10/15/2019 02:47 PM

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

**COUNTY OF HENNEPIN
STATE OF MINNESOTA**

State of Minnesota

Plaintiff

vs.

Mahad Jama Ali

Defendant

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

Signature of Authorized Service Agent:

DEFENDANT FACT SHEET

Name: Mahad Jama Ali
DOB: 09/23/2001
Address: 3542 Dupont Ave N
Minneapolis, MN 55412

Alias Names/DOB:

SID: MN18A52725

Height:

Weight:

Eye Color:

Hair Color:

Gender: MALE

Race: Black

Fingerprints Required per Statute: Yes

Fingerprint match to Criminal History Record: Yes

Driver's License #:

SILS Person ID #: 870362

SILS Tracking No. 3133747

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	10/11/2019	609.19.1(1) Murder - 2nd Degree - With Intent-Not Premeditated	Felony	H2812		MN0271100	19308674
	Penalty	10/11/2019	609.19.1 Murder - 2nd Degree	Felony	H2812		MN0271100	19308674
	Modifier	10/11/2019	609.11.9 Minimum Sentences of Imprisonment - Applicable Offenses	No-Level	H2812		MN0271100	19308674
	Penalty	10/11/2019	609.229.3(a) Crime Committed for Benefit of Gang-Commit Felony	Felony	H2812		MN0271100	19308674
	Penalty	10/11/2019	609.11.5(a) Minimum Sentences of Imprisonment-Firearm Use or Possession	Felony	H2812		MN0271100	19308674